



**STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



**BUREAU OF WATER MANAGEMENT
PERMITTING, ENFORCEMENT & REMEDIATION DIVISION
FEDERAL REMEDIATION PROGRAM**

July 11, 1997

Mr. Mark Evans
U.S. Department of the Navy
Northern Division, Naval Facilities Engineering Command, Code 1823
10 Industrial Way, Mail Stop 82
Lester, PA 19113-2090

Re: State Comments Regarding Proposed Plan for Site 15- Spent Acid Storage and Disposal Area, Naval Submarine Base New London, Groton, Connecticut

Dear Mr. Evans:

The Department has received and reviewed the Proposed Plan for the Spent Acid Storage and Disposal Area (SASDA) at the Naval Submarine Base New London in Groton.

The preferred alternative being presented by the Navy in the Proposed Plan for the SASDA is no further remedial action. When this alternative was first being considered, the Department could not agree that no further action was necessary because the results of confirmation soil samples collected by the Navy from the limits of the excavation in January 1995 greatly exceeded Connecticut's Pollutant Mobility Criterion (PMC) for lead in soil. These samples were analyzed using the Toxicity Characteristic Leachate Procedure (TCLP), which is a very aggressive leaching procedure. The State's Remediation Standard Regulations (RSRs) allow the use of either the TCLP or the Synthetic Precipitation Leachate Procedure (SPLP), which is a leaching procedure designed to simulate infiltration of acid rain, to evaluate compliance with the PMC. DEP offered to conduct additional sampling and analysis using the SPLP to try to resolve this dispute.

Additional soil samples collected by DEP in June 1997 were analyzed using the SPLP to determine whether the removal action conducted by the Navy in January 1995 removed all soil with the potential to leach lead at levels in excess of the PMC. The attached sample results indicate that soil remaining at the SASDA does not leach lead in excess of the PMC for an area with a GB ground water classification *when the SPLP is used*. Since compliance with the State's RSRs has now been demonstrated, CT DEP can support the Navy's determination that no further remedial action is warranted at the SASDA.

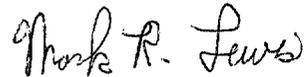
(Printed on Recycled Paper)

79 Elm Street • Hartford, CT 06106 - 5127
An Equal Opportunity Employer

Spent Acid Storage and Disposal Area Proposed Plan
State of Connecticut Comments
July 11, 1997
Page 2 of 2

If you have any questions regarding this letter, please contact me at (860) 424-3768.

Sincerely,



Mark R. Lewis
Senior Environmental Analyst
Federal Remediation Program
Permitting, Enforcement & Remediation Division
Bureau of Water Management

cc: Kymberlee Keckler, US EPA New England, Federal Facilities Section
Andy Stackpole, NSBNL Environmental Department
Jack Looney, CT Attorney General's Office

**Summary of Results of Soil Sampling Program
Naval Submarine Base New London
Spent Acid Storage and Disposal Area**

Connecticut Department of Environmental Protection

Report Date July 11, 1997

SPLP Lead

Boring Number	Depth Interval Sampled, feet below grade	Results (mg/l)	Sample Collection Date, Time	GB Pollutant Mobility Criteria (mg/l)
SB-1	4'-6'	0.02	6/9/97 10:30	0.05
SB-3	4'-6'	ND<0.01	6/9/97 13:55	0.05
SB-3	6'-8'	0.01	6/9/97 14:05	0.05
SB-3	8'-10'	0.03	6/9/97 14:15	0.05
SB-4	4'-6'	ND<0.01	6/18/97 12:00	0.05
SB-5	4'-6'	0.01	6/18/97 11:40	0.05
SB-6	4'-6'	0.03	6/9/97 11:50	0.05
SB-7	4'-6'	0.04	6/9/97 11:30	0.05
SB-8	4'-6'	ND<0.01	6/9/97 10:45	0.05
SB-9	4'-6'	0.03	6/9/97 11:15	0.05
SB-10	4'-6'	0.05	6/9/97 12:15	0.05
SB-12	4'-6'	0.01	6/9/97 12:40	0.05
SB-13	4'-6'	ND<0.01	6/18/97 11:20	0.05
SB-14	4'-6'	ND<0.01	6/18/97 11:00	0.05
SB-15	4'-6'	0.02	6/9/97 13:40	0.05
SB-16	4'-6'	0.03	6/9/97 13:30	0.05

Extraction Method: Synthetic Precipitation Leachate Procedure (EPA SW 846 Method 1312)

Analytical Method: Direct Aspiration Flame AA (EPA SW 846 Method 7420)

Analysis by: State of Connecticut
Department of Public Health
Bureau of Laboratory Services