



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO

5090
Ser 1789/1823/DS

JAN 28 1993

Andrew Miniuks
U.S. Environmental Protection Agency
Region I
JFK Federal Building
Boston, MA 02203-2211

RE: TIME CRITICAL REMOVAL ACTION AT BUILDING 31, NAVAL SUBMARINE
BASE NEW LONDON

Dear Mr. Miniuks:

Building 31, located in the lower SUBASE, is used as a hazardous materials storage building and is listed in the Federal Facilities Agreement as a study area for future investigation. The SUBASE was in the process of replacing the building's concrete foundation to comply with RCRA regulations in late November 1992 when a yellow discoloration was discovered underneath on the concrete slab. Soil samples were taken at depths of 18 inches and 60 inches and elevated lead levels were found. Lead levels ranged from 0.1 to 400 ppm (TCLP). The Navy believes the contamination stems from operations during the 1940's when the building was used as a battery shop.

No groundwater samples were taken, so it is not known if the lead contamination present in the soil has migrated to the water table. The water table is approximately six feet below the soil surface.

The Navy is pursuing this project as a time critical removal action, with the removal action to be initiated within six months. Excavation of the hot spots and capping are the remedial options that are being considered to eliminate the source of the contamination.

Additional samples will be taken to obtain sufficient data to define the extent of lead and related battery contaminated soils and groundwater at Building 31. Attached is a draft copy of the proposed sampling plan for your information. The data will be used to prepare an Action Memorandum and other supporting documentation for a time critical removal action.



A time critical removal action is justified in this situation for the following reasons: a) Samples taken have shown that there has been a release into the environment of a hazardous substance. b) Personnel working in the area could be exposed to the lead through inhalation or dermal contact. c) There is also the potential that groundwater is, or will be, contaminated from the migrating lead. d) This building is located on the waterfront in a flood plain. Adverse weather conditions could cause flooding and a release of the contaminated soil. e) Any contaminants in the groundwater would flow into the Thames River possibly causing a threat to aquatic life in the river and its ecosystem. In summary, actual or threatened releases of contaminants from this site, if not addressed by implementing a time critical removal action, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

If you have any questions regarding this project, please contact Deborah Stockdale at (215)595-0567.

Sincerely,

Deborah Stockdale

DEBORAH STOCKDALE, P.E.
Remedial Project Manager
By the direction of the Commanding Officer

Attachment

cc. William Mansfield, NSBNL
Paul Jameson, CTDEP

Internal copy to (w/o attach):

C1/CD

Code 18

Code 182

Code 1823

Code 1823/DS