



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

September 28, 1993

David Mui
Environmental Restoration Branch
Naval Facilities Engineering Command
U.S. Department of the Navy
10 Industrial Way
Mail Stop 82
Lester, PA 19113-2090

Re: Review of Building 31 Field Verification Sampling Plan

Dear Mr. Mui:

This office is in receipt of the response to EPA comments dated September 9, 1993 of the document entitled "Field Verification Sampling Plan for Building 31 Naval Submarine Base New London, Groton, Connecticut" dated July 1993 and prepared by Halliburton NUS Corporation.

Upon review of the responses, this office finds that with the following exception, the comments have been adequately addressed.

Page 2-2, §2.2, ¶1 While it is recognized that adjustments may be made to the 400 square foot sampling grid, it is not clear that the zone outside the building will be sampled. Since this area was potentially subjected to different operational conditions, it is imperative that suitable samples be collected even though the zones may be less than the grid spacing.

Although composite samples may provide representative contaminant levels for the bulk of the material, they will not detect areas of local high concentrations and may result in non-representative results due to mixing of relatively clean soil with contaminated soil. A grab sample should be collected for discrete analysis from visibly stained areas where present in order to correlate contaminant levels found through composite sampling.

It is not clear how sampling from the top 12 inches of the excavation side wall will facilitate evaluation of the effectiveness of the removal action as a whole.

Rec'd 10-06-93



If you have any questions concerning the above comment, please do not hesitate to contact me at (617) 573-5793.

Sincerely yours,

Paul N. Marchessault

Paul N. Marchessault, Remedial Project Manager
Federal Facilities Superfund Section

cc: Mark Krivansky, NORTHDIV
William Mansfield, SUBASE-NLON
Adam Sullivan, CT DEP
Jean-Luc Glorieux, Halliburton
Dale Weiss, TRC