



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 1

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July 23, 2001

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

Re: Remedial Action Work Plan for the Soil and Sediment Removal At Operable Unit 7 -  
Area A Weapons Center

Dear Mr. Evans:

EPA reviewed the *Remedial Action Work Plan For Soil and Sediment Removal At Operable Unit 7 - Area A Weapons Center (Site 20), Naval Submarine Base - New London, Groton, Connecticut*, dated June 28, 2001. EPA's review focused on consistency with the Record of Decision dated June 2000, EPA work plan guidance, and generally accepted practice. Detailed comments are included in Attachment A.

The Work Plan should identify asphalt-batching facilities that will potentially be used for treatment of the contaminated soil and sediment. Prior sampling at the site can be used to select appropriate facilities. Alternatively, the work plan should state that appropriate asphalt-batching facilities will not be available in Connecticut at the time of excavation (expected to be September 2001) and that landfill disposal will be required. Because of the relatively short duration of this project, pre-mobilization activities should include the procurement of the services of an asphalt-batching facility or landfill. If landfill disposal is selected instead, EPA expects to receive justification for it and convincing documentation that asphalt-batching is unavailable.

The pre-construction submittals must also include: a sampling and analysis plan for the confirmation and waste characterization samples that will be collected as part of the required scope of work; and an erosion control plan. If separate documents will not be submitted for these plans, then these plans should be incorporated into the next revision of this work plan.

The Record of Decision (ROD) requires that confirmation sampling also be conducted in Drainage Areas 2 and 3 to confirm that constituents of concern are not present at concentrations above the cleanup levels in these areas. The work plan does not discuss this requirement and should. Since the ROD did not specify the number of samples nor the sample locations, the sampling and analysis plan should propose a sampling regimen for these two areas. The

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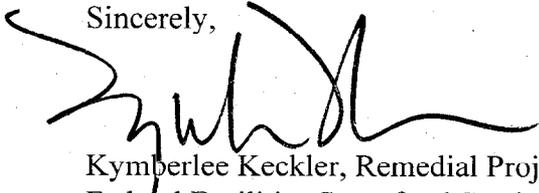
proposed sampling regimen will be reviewed by EPA so that we will agree on the number and location of samples before mobilization for the remedial action.

The work plan should provide a schedule for completion of the remedial action, including pre-mobilization activities. Milestone activities and associated dates should be presented.

While I understand the Navy's desire to control costs, the remedial action cannot be considered complete until all soils and sediments exceeding the PRGs have been removed. Otherwise, it will be difficult to make a protectiveness finding in the five year review. EPA may therefore not be able to concur that all necessary remedial action has been completed onsite.

I look forward to working with you and the Connecticut Department of Environmental Protection to complete the Remedial Action at the Area A Weapons Center. Please do not hesitate to contact me at (617) 918-1385 should you have any questions or wish to arrange a meeting.

Sincerely,



Kimberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT  
Dick Conant, NSBNL, Groton, CT  
Jennifer Stump, Gannett Fleming, Harrisburg, PA

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 1, §1.2	The text in the second paragraph should clarify that the volume of soil and sediment to be excavated includes both contaminated and non-contaminated soil and sediment. Therefore, the volume of soil and sediment requiring treatment or off-site disposal will likely be less than the volumes presented.
p. 4, §2.0	The scope of work for this project requires the excavation of soil from four localized areas at the site. A survey will be required to properly identify these excavation locations. Please add a bullet to the main activities list in this section that includes the required survey. Also, please indicate in the work plan what reference data is available to the surveyors to allow them to relocate the prior sample locations.
p. 4, §2.0	The third bullet states that samples will be analyzed for inorganics (in conformance with the requirements of the ROD). However, the previous paragraph states that the constituents of concern at the site are PAHs and arsenic. Please clarify in a sampling and analysis plan which inorganics will be analytes for this project.
p. 4, §2.1.1	This section describes pre-construction submittals to be made. Please add a sampling and analysis plan submittal and an erosion control plan submittal. If these plans will not be submitted as separate documents, then they should be incorporated into the next revision of this work plan. The erosion control plan should show the location of proposed erosion control structures, the proposed locations for soil and sediment stockpiles, indicate how the stockpiles will be protected from precipitation and runoff, describe the contingency plan for by-passing runoff around the excavated drainage ditch, provide a sketch of the proposed restoration design for the excavated drainage ditch, and describe maintenance procedures and schedules for the erosion control structures.
p. 5, §2.1.2	The work plan should identify the submittals or reports expected to be submitted for this project. In addition to the monthly reports and the project closeout report, one or more technical reports presenting the results of confirmation and waste characterization sampling will be required. It is expected that the turn-around time for the confirmation analyses and submittal of the analytical results to EPA and the CTDEP will be expedited so that agreement about the adequacy of the excavations can be reached before backfilling the excavations.
p. 6, §2.3.3, ¶1	The discussion in this paragraph, including the four bullets, is not clearly consistent with Figure 1-2. As written, the work plan text is ambiguous as to the scope of the excavations required. The text needs to be edited to indicate that, as a minimum, excavation in accordance with the information in Figure 1-2 will be required,

although all the material excavated is not expected to be contaminated. The text should then clarify, using the existing four bullets in the text, at what depths contamination is expected at each location.

p. 6, §2.3.3, ¶2 The text should be edited to state that for all excavations, excavated material presumed to have COC concentrations less than the cleanup levels will be segregated from material presumed to be contaminated at greater than the cleanup levels. Also, it is expected that soil will be segregated from sediment. The ROD and the four bullets in the first paragraph of Section 2.3.3, page 6, indicate the depths at each location that are presumed to be contaminated at greater than the cleanup levels. Clearly, the confirmation sampling required for the “presumed clean material” will be different from the waste characterization sampling required for the “presumed contaminated material.”

p. 6, §2.3.3, ¶6 This paragraph discusses the drainage swale. The second sentence states that the storm sewer passes along the southern border of the site. In fact, the storm sewer passes along the southern border of Drainage Area #1, not the site. Please correct the description. Also, it appears that this paragraph is incomplete. Two sentences of fact are presented without any apparent reason. Please review this paragraph to see if further discussion related to the excavated swale has been inadvertently omitted.

p. 7, §2.3.5, ¶1 Please indicate the expected resolution (accuracy) for the GPS data to be collected as described in the referenced text.

p. 7, §2.3.5, ¶2 Please add that an as-built drawing of the restored drainage swale will be included in the monthly reports and the project closeout report.

p. 7, §4.0, ¶1 Please clarify which Scope of Work is referenced in this sentence. The Remedial Action Work Plan and associated documents (SAP, HASP, erosion control plan) should identify all activities required to complete the remediation.

Table 2-5 For the sediment portion of the table, there is an apparent formatting error that has resulted in dibenz(a,h)anthracene being presented twice - once without cleanup level data and once with cleanup level data. Please correct the error.

Table 2-5 The last page of the document, labeled page 4 of 5, presents a portion of some costing information. What is the purpose of this page? Are there additional pages that should also be included? This page does not appear to be a part of Table 2-5. Please correct as appropriate.