



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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NSB NEW LONDON
5090.3a

September 24, 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: Final Remedial Action Work Plan for the Soil and Sediment Removal at Operable Unit 7
- Area A Weapons Center (Site 20) at the Naval Submarine Base - New London

Dear Mr. Evans:

EPA reviewed the *Final 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 September 14, 2001. The review focused on compliance with EPA comments, adherence to the Record of Decision dated June 2000, EPA work plan guidance, and generally accepted practice. Most of EPA's earlier general and specific comments have been adequately addressed in the Final Work Plan, with two exceptions: 1) the locations of the stockpiles were not identified except to state that they will be located adjacent to the excavations [see specific comment], and 2) the apparent formatting error in Table 2-5 was not corrected. I have also faxed you a copy of a map depicting recommended sampling stations in the drainage ditches. Detailed comments are provided in Attachment A.

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.

Sincerely,


Kymberlee 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

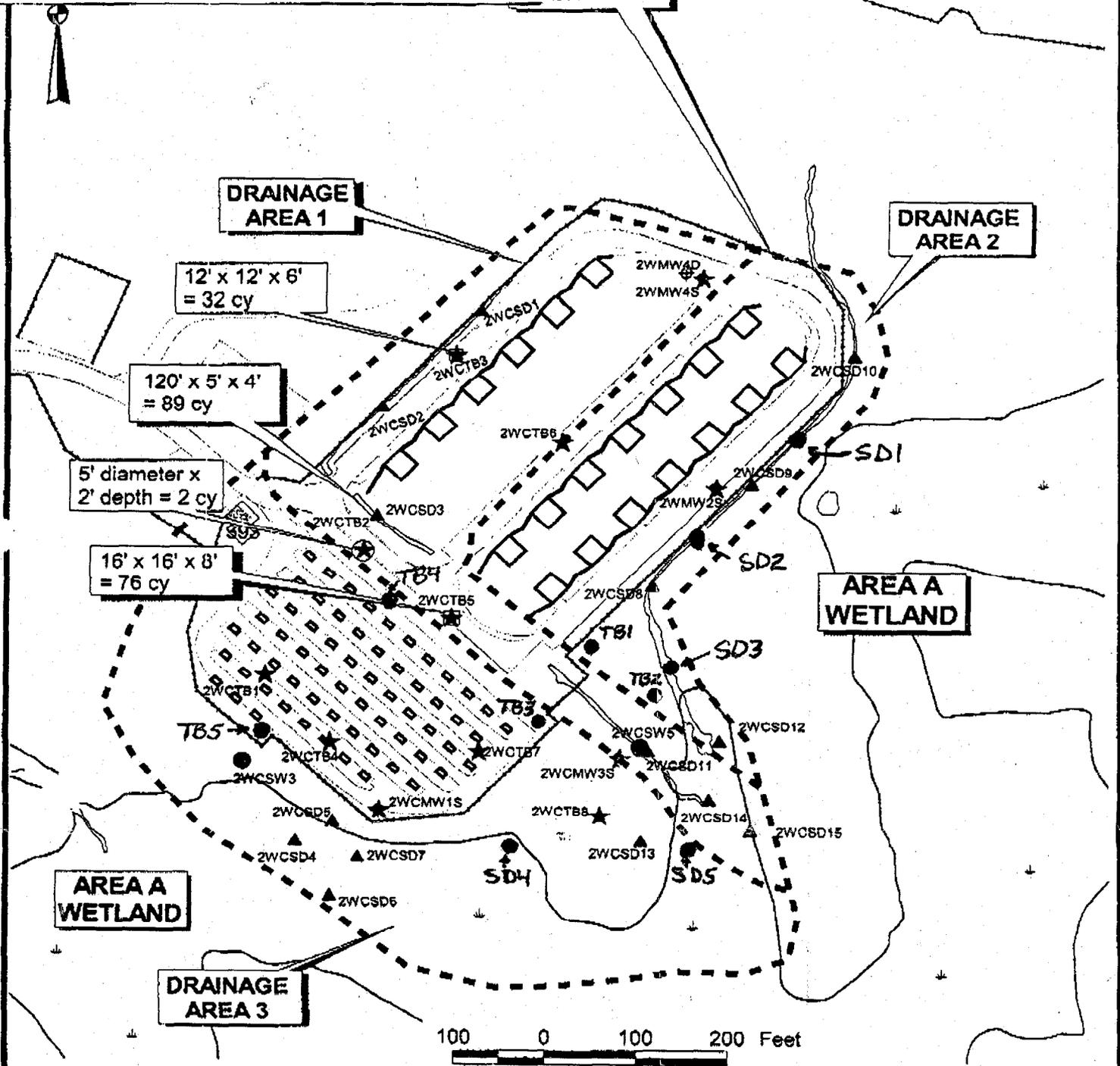
<u>Page</u>	<u>Comment</u>
p. 7, §2.3.4, ¶2	Please clarify that each composite sample collected from the stockpiles of presumed-clean material will be made up of one base sample plus one additional sample for each 25 cubic yards in the stockpile (a minimum of two subsamples per stockpile). The compositing protocol for contaminated material must satisfy the off-site facility's requirements. Material may not be returned to the site unless sampled as indicated for the presumed-clean material.
p. 7, §2.3.4, ¶6	This paragraph mistakenly references 2WCTB2 twice. It appears that the reference should be to 2WCTB3 and 2WCSD3. Both of these excavations will apparently intersect the drainage ditch, but excavations at 2WCTB2 and 2WCTB5 apparently will not. Please revise and correct as appropriate.
p. 9, §2.4.2, ¶2	The reference to 40 CFR §761.61 is not appropriate for the collection of confirmation samples at this site. Please review the reference and either delete it or clarify how it applies to this project.
p. 12, Table 2-1	<p>This table lists only two samples for waste characterization. However, since presumed-clean materials will be stockpiled separately from contaminated materials and soil will be stockpiled separately from sediment, there could be four stockpiles of material. Furthermore, the work plan states that stockpiles of excavated material will be located adjacent to the excavations. With four excavations, this could result in eight stockpiles, although only six are likely based on the sample data.</p> <p>Presumed-clean soil and sediment, if any, will need to be stockpiled and sampled separately if the materials are to be returned to the site. However, if separate stockpiles of clean soil are maintained, as proposed in the work plan, it will not be possible to allow a single composite sample to represent both stockpiles. If one stockpile exceeds cleanup goals while the other meets the goals such that the composite sample also meets the goals, contaminated soil would be returned to one of the excavations. Therefore, each stockpile of clean material must be sampled separately.</p> <p>For contaminated materials, it is possible, depending on off-site disposal requirements, to stockpile and/or sample soil and sediment together. However, even if that is done, it appears that at least 120 cubic yards of contaminated material will be excavated (disregarding swell) and;</p>

therefore, at least two waste characterization samples will be required for materials destined for off-site disposal in addition to the samples required for clean materials.

Please edit the work plan to provide the correct number of waste characterization samples. Also, please edit the work plan to identify the proposed locations for the material stockpiles unless there truly will be multiple stockpiles each located adjacent to an excavation.

Post-it® Fax Note	7671	Date	9/24/01	# of pages	1
From	KYMBERLEE Keckler	From	MARK EVANS		
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**AREA A
EAPONS
CENTER**



**DRAINAGE
AREA 1**

**DRAINAGE
AREA 2**

**AREA A
WETLAND**

**AREA A
WETLAND**

**DRAINAGE
AREA 3**

100 0 100 200 Feet

- LEGEND:**
- ▲ Sediment sample
 - ★ Soil sample
 - Surface water sample
 - ⊕ Existing monitoring well
 - ▣ Building
 - ⬇ Wetland
 - ⚡ Bunker Fence
 - Pavement
 - ~ Drainage ditch
 - Excavation limit

FIGURE 4-2
**AREAS OF PROPOSED SELECTIVE
 EXCAVATION FOR ALTERNATIVE 3b
 (RESIDENTIAL LAND USE SCENARIO)**
**SITE 20 - AREA A WEAPONS CENTER
 NAVAL SUBMARINE BASE
 NEW LONDON, CONNECTICUT**



Note: Excavation limits not to scale. cy = cubic yard.