



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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December 18, 1991

Adrienne P. Townsel
Environmental Restoration Branch
Naval Facilities Engineering Command
US Naval Base, Bldg. 77 Low
Philadelphia, PA 19112-5094

Re: Addendum No. 1 Plan of Action for Pier 33 and Berth 16,
Reference 5090, Ser 1431/1423/AT

Dear Ms. Townsel:

The report entitled "Addendum No. 1 Plan of Action Pier 33 and Berth 16, Installation Restoration Study, Naval Submarine Base - New London Groton, Connecticut", has been reviewed by staff from the Site Remediation and Closure Division (SRCD) of the Waste Management Bureau. The report, dated October, 1991, was prepared by Atlantic Environmental Services on behalf of the Department of the Navy. The following comments are based on a review of the report:

- 1) Page 3, Section 2.1 - Section 2.1 of the report notes that sulfuric acid was stored in above-ground storage tanks located in building 175. These tanks were connected to the piers by underground pipes. It is not stated in the text whether the acid trench (depicted in Figure 2-1) housed the underground pipes. In addition, if documented spillages or leakages occurred within this system, construction details of the trench would become important for this investigation.
- 2) Page 3, Section 2.2 - The Site Plan for Berth 16 (Figure 2-2) depicts the former location of the dumpster washing area and former incinerator. Section 2.2 should explain in greater detail activities associated with the incinerator. More specifically, what types of material were brought here to be incinerated and the fate of the incinerator ash.
- 3) Page 6, Section 2.2 - It is noted that Building 173 was formerly serviced by a septic tank. Indicate if the tank was connected to a leachfield or pumped out on a periodic basis. Figure 2-2 should depict the leachfield if it existed.

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- 4) Page 17, Table 4-4 - This table delineates the media and type of analysis that will be performed for each sample location at Pier 33. The following items should be revised: 1) it is unclear why TCLP metals and grain size analysis is proposed for groundwater at sample locations labeled 19GW2, 19GW3 and 19GW4; 2) footnote #2 should reference table 4-3, not table 4-1; 3) although listed under the column labeled "Sample Location", no sampling is proposed for test boring 19TB4; 4) it may be advantageous to obtain a shallow soil sample underlying the acid trench to determine the impact that this system may have had on the site (see comment #1).
- 5) Page 18, Section 4.2.2 - The multi-media inspection performed in April of 1991 found oil-stained concrete pads and leaking transformers containing PCBs within buildings 173 and 157. Unless an adequate determination was made from a prior investigation, the proposed investigation for this site should incorporate provisions to address any potential impact these conditions may have had on soils and groundwater.
- 6) Page 18, Section 4.2.2 - A description of the soil gas survey methodology for Berth 16 is presented in Section 4.1.2, not section 4.1 as indicated.
- 7) Page 20, Table 4-5 - This table contains inconsistencies for Berth 16 that are similar to those addressed in comment #4 for Pier 33. The table should be revised as necessary.
- 8) Page 25, Figure 7-1 - The soil gas survey, as proposed under Section 4.1.2, is not depicted in the Preliminary Project Schedule. In addition, the schedule indicates that hydraulic conductivity tests will be performed. However, Section 4.1.4 notes that hydraulic conductivity will be estimated based on grain size analysis, published data, and from previous studies. The schedule should be revised as necessary.

If you have any question regarding these comments, please contact me at (203) 566-5486.

Sincerely,



Paul Jameson
Environmental Analyst
Site Remediation & Closure Division
Waste Management Bureau