



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

N00129.AR.000088
NSB NEW LONDON
5090.3a

October 8, 1992

Deborah Stockdale, RPM
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Dear Ms. Stockdale:

Per the recent telephone conversation between yourself and Carol Keating, EPA has reviewed the Draft Final Plan of Action for Berth 16/Former Incinerator and Pier 33 (July 1992) and has identified the following deficiencies. In addition, a conference call has been scheduled for Thursday, October 8th from 1 - 2 p.m. to discuss the items listed below. The conference call number is (202) 260-3641.

GENERAL COMMENT

1. Based on EPA's experiences, it is not uncommon to find dioxins and/or furans at the locations where the combustion of chlorinated organic compounds have occurred. As stated on page 10 in Volume I of the Plan of Action, all non-salvageable materials generated by base operations at NSBNL were incinerated. The incineration of waste materials generated at the base, in conjunction with the other types of activities that took place in this area, would suggest the possible presence of dioxins, furans or similar compounds at the base.

In order to confirm or deny the presence of these combustion by-products, the Navy should collect soil and groundwater samples to be analyzed for dioxins, furans and other chemically-related compounds.

SPECIFIC COMMENTS

Berth 16/Former Incinerator

1. Section 4.1.4 - Hydraulic Conductivity -

As noted on page 3 of EPA's February 14, 1992 comment letter on the draft Plan of Action, monitoring wells should be tested for hydraulic conductivity utilizing pump or slug testing. Most of the hydraulic conductivity testing performed to date has not yielded sufficiently useful data and it is common practice to perform a slug test of a new well, not only to evaluate subsurface conditions but to verify the integrity of the monitoring well.



Therefore, the Navy should perform hydraulic conductivity testing during this Step I investigation.

2. The Navy has proposed to use three criteria for the collection of soil samples for VOC analysis. These criteria include: the collection of samples at the highest HNu readings; in areas of visible contamination; and lacking organic vapors or visible contamination, the sample will be collected randomly.

The Navy should use a geologic characteristic (e.g., change in stratigraphy or grain sizes) as the fourth sample collection criteria before resorting to a randomly collected sample.

3. The Navy states on page 2 of the Response to Comments that the Plan of Action has been revised to include sampling of storm drain sediments. The Plan of Action describes the collection of sediment samples from two catch basins which will then be used to determine the locations of areas contributing to contaminated surface runoff. The Plan of Action does not specify how these sample results will be used to determine the source area(s).

The Navy should specify the procedures for determining these areas.

4. If free product/separate phase contamination is encountered during the course of field activities, then a sample should be collected for petroleum fingerprinting or other chemical analysis. In addition, the Navy should immediately implement steps to stabilize the migration of this material (e.g. installation of extraction/scavenger wells).

Pier 33

5. Since the presence of widespread inorganic contamination is suspected at this base, it will be very difficult to exclude this site from further investigation if insufficient data is gathered during the Step I investigation.

Therefore, the Navy should expand the scope of the field screening efforts to include the analysis of samples for inorganic contamination.

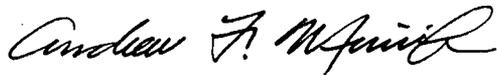
6. The Navy has proposed the collection of sediment samples from the two catch basins near Pier 33. In addition to this effort, the Navy should collect and analyze soil/sediment samples from the area(s) suspected of contributing to contaminated surface water runoff.

By taking this approach, the Navy will be able to compare the results of the two analyses and determine, if contamination is detected in the source area(s) and catch basin sediments, the probable source of the contamination.

You should submit a brief description of the changes that the Navy will be making to the Plan of Action for Pier 33 and Berth 16/Former Incinerator in response to these comments. This description, which should be no more than one or two pages in length, should be sent to EPA. In addition, a response to these comments should not prohibit the immediate initiation of the field activities.

If there are any questions with these comments, you should feel free to call me at (617) 573-9614.

Sincerely,



Andrew F. Miniuks, Geologist
Federal Facilities Superfund Section

cc. Carol Keating, EPA
William Mansfield, NSBNL
Dale Weiss, TRC