

December 14, 1992

Mr. Andrew F. Miniuks
Geologist
United States Environmental
Protection Agency
Federal Facilities Superfund Section
Region I
J.F.K. Federal Building (HAN-CAN1)
Boston, MA 02203

RE: Naval Submarine Base - New London
Groton, Connecticut
Pier 33 and Berth 16/Former Incinerator Work Plan
Atlantic Project No.: 1256-15-01

Dear Mr. Miniuks:

On behalf of the Navy, Atlantic has prepared this letter in response to your comments dated October 8, 1992. These responses reflect our discussions during a phone conference on October 8, 1992 between USEPA, CTDEP, Navy and Atlantic.

GENERAL COMMENT

1. The Navy agrees to perform testing for dioxins/dibenzofurans in six soil samples; one each from sample locations 20TB5, 20TB6, 20TB7, 20MW5, 20MW6 and 20MW7. The sample selected at each location will be a sample containing ash, if any is present. If no ash is evident, the sample will be a composite of the 0- to 4-foot interval below grade. These six sample locations are located in the area of the former incinerator and dumpster washing area.

SPECIFIC COMMENTS

Berth 16/Former Incinerator

1. It was agreed that hydraulic conductivity testing will not be conducted as part of this Step I investigation as the overall goal of this investigation is

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to determine whether contaminants are present at levels of concern. Should Step II investigations be necessary, the Navy agrees to perform hydraulic conductivity testing if this data is necessary to determine the rate of contaminant migration or to evaluate remedial alternatives for contaminated ground water.

2. The Navy agrees to using a geologic characteristic (e.g., change in stratigraphy or grain size) as the fourth sample collection criterion before resorting to a randomly collected sample. This fourth criterion would involve selecting samples located at intervals where contaminants might accumulate, such as at the top of a fine-grained layer overlain by a coarse sand and gravel layer.
3. It was agreed that additional surface soil sampling will not be necessary to determine the source of any contaminants that may be in storm drain sediments. At this site, all upgradient areas are paved.
4. The Navy agrees that, if free product is encountered during the course of field activities, a sample will be collected for petroleum fingerprinting and steps will be taken to immediately stabilize the migration of free product.

Pier 33

1. The need for field screening was discussed. It was agreed that it was not necessary as part of this Step I investigation because one boring will be sampled and analyzed continuously to bedrock, the 0- to 4-foot composite samples cover the entire unsaturated thickness, and a deeper sample will be collected at each location.
2. It was agreed that additional surface soil sampling will not be necessary to determine the source of any contamination that may be in storm drain sediments. At this site, upgradient areas are paved except for a small grassed area near Building 175, at which a surface soil sample is already proposed to be taken.

The Navy and Atlantic are presently working on the contract to implement this work plan as modified by the above responses so that field activities will not be delayed. Should you have

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any questions, please feel free to contact Deborah Stockdale at (215) 595-0567 or me at (203) 537-0751.

Sincerely,

ATLANTIC ENVIRONMENTAL
SERVICES, INC.



Barry L. Giroux, P.E.
Project Manager



Paul Burgess, P.E.
Principal

BG/PB:sr

cc: D. Stockdale - NORDIV
B. Mansfield - NSB-NLON

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