



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO

5090.
Ser 1784/1823/DS
January, 25, 1993

Andrew Miniuks
USEPA, Region I
Federal Facilities Superfund Section
J.F. Kennedy Federal Building
Boston, MA 02203-2211

RE: DRAFT WORK PLAN FUEL FARM UST REMEDIAL INVESTIGATION,
SUBASE NEW LONDON, SEPTEMBER 1992

Dear Mr. Miniuks:

The Navy has reviewed the comments which were forwarded in your letter of December 4, 1992. Attached is our Response to Comments. Only those comments which we discussed during our conference call with you on January 13, 1993 are addressed. Any comments not addressed in this response were accepted for incorporation into the revised work plan.

If you have any questions regarding this response, please call Debby Stockdale or Brian Helland at (215)595-0567.

Sincerely,

Deborah Stockdale

DEBORAH STOCKDALE, P.E.
Remedial Project Manager
By the direction of the Commanding Officer

Copy to: William Mansfield, NSBNL
Paul Jameson, CTDEP



U.S. EPA - REGION I
U.S. NAVY - NSB NEW LONDON, CT
FUEL FARM UST REMEDIAL INVESTIGATION WORK PLAN
COMMENTS AND RESPONSES

GENERAL COMMENTS

2. The Navy should perform a ground penetrating radar survey in this area to determine the depths of the drainage pipes and the location of possible unknown pipes.

Response: Due to the lack of accurate as-built drawings of the abandoned fuel lines, a ground penetrating radar survey will be included.

4. Provide a summary of all previous sampling data in the revised Work Plan.

Response: An abbreviated summary of previous sampling data will be provided in the revised Work Plan.

6. A conceptual site model should be developed in the Work Plan. The model should address groundwater elevation changes caused by the tidal influences of the Thames River, develop a preliminary understanding of groundwater flow directions, and postulate source areas and contaminant migration pathways.

Response: Based upon available data, a conceptual site model will be developed for the revised Work Plan.

12. Modify the Work Plan to incorporate the results of the fuel line testing before sampling tasks begin to determine the integrity of the lines and possible source locations.

The drainage systems should be investigated as a source area, since it is not water tight and has historically contained contaminants.

Response: The fuel line testing mentioned in the Work Plan was inconclusive due to difficulties in isolating sections of the pipelines. Incorporation of the results would not be beneficial.

The revised Work Plan will adequately address potential contamination from the drainage systems.

14. A visual inspection of the interior of the fuel tanks should be performed prior to any sampling to determine which underdrain system is in use for each tank.

Response: Existing drawings of the tanks provide adequate information regarding existing underdrain systems. NSB New London personnel indicate that all underdrain systems employ French drains. Pop-up valves are not indicated by available drawings.

15. Hydraulic fluid was recovered on five separate occasions in 1990 at the outfall pipe at Goss Cove. Therefore, hydraulic fluid should be one of the primary constituents at this site.

Response: Hydraulic fluid has not been stored in the fuel farm. Reports of hydraulic fluid are attributed to spills directly into the waters of Goss Cove from the USS Nautilus and other ships nearby.

17. The Work Plan should state the procedures to be followed if an unknown underground pipe is breached during RI field investigations.

Response: The revised Work Plan will incorporate general emergency spill response procedures, to include all likely spill scenarios.

19. The Work Plan states that the present "drainage system appears to have been installed with perforated metal corrugated pipe (PMCP) to depress the water table by allowing groundwater to collect and discharge into Goss Cove." Also stated is the fact the underground tanks are being decommissioned and that a new drainage system has been designed to replace the old system. Modify the Work Plan to incorporate any possible changes in the groundwater table, and the effects on migration pathways, as this may change the focus of any future RI work.

Response: The existing 12-inch diameter drainage system will be replaced in the same location with a 24-inch diameter system as part of the decommissioning of OT-4, OT-7, OT-9 and OT-9. It is not possible at this time to make quantitative estimates of the effect on the groundwater table.

SPECIFIC COMMENTS

4. Describe the tank decommissioning procedures which were used for tanks OT-4/OT-5 and OT-6. If soil sampling was conducted during any of these procedures, provide the sampling and analytical results.

If these tanks are still in the ground, describe the actions the Navy plans on taking to comply with the current standards regulating the decommissioning of Underground Storage Tanks (USTs).

Response: OT-6 is the only tank at the tank farm that has been decommissioned. It was demolished and backfilled many years ago. No records of the project are available.

OT-5 is scheduled for closure in Spring 1993. The project will consist of emptying/cleaning of the tank, removal of soil on top of the tank, demolition of the top of the tank, and backfill with clean fill. Soil sampling will be limited to that which is required to determine disposal requirements for excavated soils. Project plans and specification were forwarded to EPA Region I on 14 September 1992.

OT-4, OT-7, OT-8 and OT-9 are scheduled for closure in Summer/Fall 1993. Decommissioning procedures will be similar to those for OT-5, but will include removal of connected pipelines. Soil sampling is planned along the pipelines connected to the tanks. The existing 12-inch diameter drainage system will be replaced in the same location with a 24-inch diameter system as part of this project.

8. Provide the results from the hydraulic testing of the existing fuel lines that extend from the pier to the UST farm. The draft Work Plan indicated that the lines were scheduled to be tested by a contractor in late June/early July 1992.

Response: The fuel line testing mentioned in the Work Plan was inconclusive due to difficulties in isolating sections of the pipelines. Incorporation of the results would not be beneficial.

9. Describe the proposed procedures that the Navy would use to notify EPA if one or more TCL/TAL analyte is detected during the Underground Storage Tank Sampling as specified in Task 2.

Response: Copies of all project documentation will be forwarded to EPA upon publication. Notification procedures will not be addressed in the revised work plan.

16. The Navy has proposed to test "selected" oily samples from Tanks OT-5 and OT-6 for the presence of PCBs. Since PCBs are a known contaminant in this area, all soil samples gathered from the area adjacent to Tank OT-5 should be analyzed for PCBs.

Provide the proposed criteria that would be used to determine if the soil samples taken from other areas would be submitted for PCB analysis.

Response: All soil samples adjacent to OT-5 will be submitted for PCB analysis. Samples at other locations which appear to contain oil will also be submitted for PCB analysis.

18. The Navy should implement an expanded soil sampling in this area (i.e., ERM 25-28, the oil wastewater containment tank, oil/water separator and OT-10 the waste oil storage tank) prior to the placement of any monitoring wells or conducting hydropunch activities.

Response: Field screening of the upper two feet of soil will be conducted with a field GC to aid in selection of final monitoring well and hydropunch locations.

22. The Navy repeatedly describes the analytical results of previous investigations and analyses in qualitative terms. This type of information is not very useful. The final draft workplan should include a complete description of the analytical results from all previous investigations in this area. This information could include the analytical method used for each of the media, the detection limits achieved during the analyses, the list of analytes and the concentration of each of the analytes.

Response: An abbreviated summary of previous sampling data will be provided in the revised Work Plan.

29. The Navy has indicated that more than 2 feet of floating oil has been found in Well MW-7. If this is an accurate statement, then the Navy should immediately implement steps to stabilize the migration of this material (e.g. installation of extraction/scavenger wells).

Response: Contacts with personnel at NSB New London failed to confirm the report of free product in monitoring well MW-7. This will be confirmed during field activities.

42. Modify the work plan to include the preparation of a map of the study area. This map would visually describe the distribution of contaminants, with contours of the chemical concentrations and the areal. The vertical extent of contamination should be demonstrated through cross-sections.

Response: Data on plumes within the Fuel Farm are limited. The existing site plan will be modified to include the plume from the NEX Service Station and notation of any additional "hits".