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NSB NEW LONDON
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT SAMPLING AND
ANALYSIS PLAN FOR ZONE 4 SEDIMENT PRE DESIGN INVESTIGATION NSB NEW
LONDON CT
09/26/2011
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

September 26, 2011

Mr. Dominic O'Connor
Remedial Project Manger
Environmental Restoration
NAVFAC MIDLANT OPNEEV
Bldg. Z-144
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Sampling and Analysis Plan for the Pre-Design Investigation for Zone 4 Sediment

Dear Mr. O'Connor:

Thank you for the opportunity to review the *Draft Sampling and Analysis Plan for Pre-Design Investigation for Zone 4 Sediment* at the Naval Submarine Base dated August 2011 (SAP). The SAP presents the sampling design and rationale and the analytical and data assessment requirements for the project in accordance with the requirements of the *Uniform Federal Policy for Quality Assurance Plans* and *EPA Guidance for Quality Assurance Project Plans*. Detailed comments are provided in Attachment A.

The area at the southern end of the former Pier 1 had contamination in the four to six foot depth interval in sample TRP1-SD-005 that exceeded the cleanup goals and disposition of this area was postponed to the Feasibility Study (FS). (It was not included in the Lower Subbase FS.) No other samples have been collected in the vicinity of TRP1-SD-005 so the magnitude and extent of contamination (horizontally and vertically) is not defined near this sample. Please how this area will be evaluated if not done during the sampling event associated with this SAP.

The Building 79 waste oil pit discharged beneath the pier adjacent to the Thames River presumably accounting for some of the contamination in the Zone 4 sediment. No sampling has been conducted in the sand/sediment beneath the pier in the vicinity of the discharge to determine whether a continuing source exists. In conjunction with the sampling associated with this SAP, samples should be collected beneath the pier before a remedy is selected for Zone 4 sediment to determine if a continuing source exists that would interfere with the permanence of the Zone 4 sediment remedy.

The PDI proposes sample locations that in part step out from locations with cleanup goal exceedances. Secondary samples outward of the proposed perimeter samples have not been included in this sampling event. If the proposed outer perimeter samples are contaminated, a supplemental sampling round will be required to characterize the extent of contamination. This requirement is confirmed by the decision rule in Section 5.4.

I look forward to working with you and the CTDEEP to protect the environs of the Naval Submarine Base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymerlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEEP, Hartford, CT
Tracey McKenzie, NSBNL, Groton, CT

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 9, §2.0	Please add a line item to notify the EPA at least 48 hours before commencement of field activities and 24 hours before a change in schedule so that oversight can be scheduled.
p. 10, §2.0	Please edit the procedure for “SAP Changes in the Field” by adding notification to EPA before implementing the change.
p. 45, §5.3	a) The first full sentence states that the Quay Wall is the eastern boundary of the possible extent of contaminated Zone 4 sediment. This statement may not be correct because the discharge line from Building 79 terminated behind the Quay Wall so contaminated sediment may still exist behind the Quay Wall. b) Regarding the second full sentence, for proper context, please clarify why Pier 6 constitutes a northern boundary for Zone 4 sediment.
p. 59	Please correct the analytical method for aqueous mercury to 7470A in Table 8-2.
p. 61	Please adjust the number of samples Table 8-3 to address EPA’s comments herein.
Figure 4-6	The magenta contour line for this figure denotes a 0-1 foot excavation. The same contour line on Figure 5-1 denotes a 0-2 foot excavation. Please correct.
Figure 5-1	a) Is the dredge boundary for Pier 6 relevant for this figure? Should it be included? b) Please clarify on this figure and elsewhere in the SAP what impact the maintenance dredging had on the dredge buffer area. Was sediment removed from this area? c) EPA recommends the following additions to the proposed sample locations: <ul style="list-style-type: none">• There is no shallow sediment sample bounding the offshore direction at TRZ4-SD-018 so this sample location should be yellow/blue so that five sample intervals are analyzed.• A yellow/blue sample location is needed halfway between TRZ4-SD-0007 and 0008 in the dredge buffer to fill this data gap. (Deep samples are required because the 4-6 foot sample at TRZ4-SD-0008 had an ERM-Q of 1.1, borderline acceptable.)• A yellow/blue sample location is needed equidistant from TRZ4-SD-0003, 0005, and 0006 to characterize this area because the two off-shore samples had exceedances in the 4-6 foot interval that were increasing with depth and the sample closer to shore barely passed in the 4-6 foot interval with an ERM-Q of 1.1.
	d) For TRZ4-SD-0003, the ERM-Q for the 0-1 foot interval should be pink.

e) Please add the 0-2 foot contour around sample Z4-42.

f) Although EPA recognizes that contours will be redrawn after new data are collected, please note that TRZ4-SD-006 should be within the four to six foot contour and Z4-S1 is outside all contours but the shallow sample failed.

Appendix C Please confirm whether Mitkem is also accredited and certified for PCB congeners via 8082A. It was not specifically identified in the accreditation list.