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U S EPA REGION I RESPONSE TO FOLLOW UP COMMENTS ON DRAFT SAMPLING AND
ANALYSIS PLAN DATA GAP INVESTIGATION FOR THE FORMER TANK FARM SITE 23
NSB NEW LONDON CT
10/30/2014
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

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

October 30, 2014

Ms. Elizabeth Middleton
Remedial Project Manager
Environmental Restoration
NAVFAC MIDLANT OPNEEV
Bldg. Z-144
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Responses to EPA's Comments on the Draft Sampling and Analysis Plan for the Data Gap Investigation - Site 23 – Former Tank Farm

Dear Ms. Middleton:

Thank you for the opportunity to review the Navy's October 15, 2014 responses to EPA's August 25, 2014 comments on the *Draft Sampling and Analysis Plan (SAP) for Site 23 – Former Tank Farm* dated July 2014. The SAP presents the sampling design/rationale and the 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.

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

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachments

cc: Kenneth Feathers, CTDEEP, Hartford, CT
Tracey McKenzie, NSBNL, Groton, CT

ATTACHMENT A

Page

Comment

p. 11-2, §11.2

While I agree that the existing Site with closely-mown grass and the current industrial and recreational use is a lower quality ecological habitat (and if maintained this way in perpetuity would result in minimal ecological exposure), EPA does not agree that the pathway is incomplete. As discussed previously, if the Navy establishes land use controls to guarantee the current Site use and condition or the equivalent in perpetuity, then no ecological risk screening will be required. If Navy is not able to do this and contamination is detected in the proposed surface soil sampling at concentrations exceeding previously detected values, a separate ecological screening evaluation incorporating the new data is required and can be appended to the SASE report. As stated on our monthly RPM call, EPA believes that a screening-level ecological risk assessment using insectivorous birds and/or mammals would be appropriate. A Step 3A refinement might also be considered should any contaminants fail initial screening. Consistent with other sites, EPA expects to be consulted whenever a Step 3A refinement is proposed to be used. This approach has been used at other Navy sites and is in keeping with Navy policy. EPA has accepted this approach provided the initial screening and any refinement steps are justified and supported.

In the interest of moving this site forward, the SAP can be implemented using the current project action limits (PALs) because, based on experience at other sites, it is unlikely that the analytical methods would change if the SAP were revised to incorporate ecological risk-based PALs. In the unlikely event that this results in a reporting limit above an ecological benchmark, EPA proposes that this be dealt with as an uncertainty in the ecological assessment.

p. 11-3, §11.3

Third bullet: Please refer to EPA's comment above on page 11-2, §11.2

p. 11-4, §11.5

Please refer to EPA's comment above on page 11-2, §11.2.

p. 14-3, §14, ¶5

The laboratory's goals are not screening criteria. Revise the fourth sentence to refer to the laboratory's Limits of Quantitation rather than screening criteria. The Limits of Quantitation, which reflect the laboratory's expectations subject to the restrictions identified in the SAP, are expected to satisfy most ecological screening criteria.

Figure 17-1 (updated) Because much of the soil east of the concrete loading pad was excavated and backfilled with non-site soil during removal of the oil-water separator, wet well, and 3,000-gallon waste oil tank (*see* OT10 UST Closure Reports), soil sampling in that area is not appropriate. The proposed locations SB-1, SB-4, and SB-5 need to be relocated. Also, because the former 30,000-gallon tank (NN-03) was closed in place, this will need to be accounted for in selecting sampling locations there (and at OT10-3). Limited excavation around the 30,000-gallon tank was conducted during closure to access piping

for removal and to collect sidewall samples. Eight samples were collected, two from each side, one from each end, and two beneath the tank. The attached figure presents an alternative sampling plan for the OT10 area (locations shown in light blue). Locations were selected to target waste oil holding tanks (potential overflow), transfer pipe and unloading pad (potential leaks and spills), and 30,000-gallon tank (potential overflow and spills). If other information to select more appropriate sample locations exists, please provide it and the associated rationale.