# U S NAVY RESPONSE TO U S EPA REGION I COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN DATA GAP INVESTIGATION FOR THE FORMER TANK FARM SITE 23 NSB NEW LONDON CT

11/4/2014

U S NAVY

**NAVY RESPONSES TO EPA COMMENTS DATED OCTOBER 30, 2014 ON THE DRAFT SAMPLING AND ANALYSIS PLAN - DATA GAP INVESTIGATION FOR THE FORMER TANK FARM (SITE 23) AT NAVAL SUBMARINE BASE – NEW LONDON (Dated July 2014) GROTON, CONNECTICUT**

**Initial Issue: November 4, 2014**

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| p. 11-2, §11.2 | **Comment:** 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.<br><br>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.<br><br>**Response:** Agreed, no changes to SAP necessary |
| p. 11-3, §11.3 | **Comment:** Third bullet: Please refer to EPA's comment above on page 11-2, §11.2<br><br>**Response:** Agreed, no changes to SAP necessary |
| p. 11-4, §11.5 | **Comment:** Please refer to EPA's comment above on page 11-2, §11.2.<br><br>**Response:** Agreed, no changes to SAP necessary |
| p. 14-3, §14, ¶5 | **8/25/14 EPA Comment:** Please revise the fourth sentence to refer to project quantitation limit goals rather than project action limits (PALs).<br><br>**10/15/14 Navy Response:** The sentence will be revised to the following: "The laboratory will strive to meet the screening criteria specified in Worksheet #15 and will perform the chemical analyses following the laboratory-specific SOPs identified in Worksheet #23."<br><br>**10/30/14 EPA Comment:** 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 |

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| | satisfy most ecological screening criteria.<br><br>**Navy Response:** The sentence will be revised to the following: "The laboratory will strive to meet the Limit of Quantitation specified in Worksheet #15 and will perform the chemical analyses following the laboratory-specific SOPs identified in Worksheet #23." |
| Figure 17-1 (updated) | **Comment:** 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.<br><br>**Response:** Agreed, a revised figure is attached. |