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LETTER AND U S EPA REGION I COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN
DATA GAP INVESTIGATION FOR THE FORMER TANK FARM SITE 23 FORMER TANK
FARM NSB NEW LONDON CT
12/10/2014
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

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

December 10, 2014

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

Re: Draft Final Sampling and Analysis Plan - Data Gap Investigation - Site 23 – Former Tank Farm

Dear Ms. Middleton:

Thank you for the opportunity to review the *Draft Final Sampling and Analysis Plan (SAP) for Site 23 – Former Tank Farm* at the Naval Submarine Base New London, Groton, CT, dated November 2014. 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 Goals of the Study and Information Inputs to Resolve the Problem (Sections 11.2 and 11.3, respectively) should explicitly describe the plans for ecological evaluation of the new data. EPA expects that a screening-level ecological risk assessment (SLERA) and possibly a Step 3A per Navy guidance to be completed. The current soil data are insufficient to determine the extent of impacted soil in the vicinity of OT-4 and OT-10. If the sampling reveals contaminated surficial soil, EPA expects the Navy to screen these contaminants against ecological benchmarks in a SLERA. If the SLERA suggests that contaminants pose a potential ecological risk under current or reasonably foreseeable future scenarios, EPA agrees that a Step 3A may be used to refine the assessment. The SASE currently states that the need for an ecological risk evaluation will be evaluated based surface soil results and EPA ecological risk guidance. Please expand Sections 11.2 and 11.3 to explain how that determination will be made.

EPA reviewed the project reporting limits and has determined that they are sufficiently protective for use in the ecological assessment, even though they were not selected based on this criterion. The contaminant concentrations that pose a potential future ecological risk would have to be sufficiently higher than the human health or ecological screening values.

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,

Kymerlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

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

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. I, Ex. Smy., ¶4	The text states that NN-02/OT10-3 and NN-03 were closed under CTDEEP UST Guidance in 2006. Section 10.2.2, page 10-6 states that NN-02, the 10,000-gallon tank, was removed in 1999 and replaced with OT10-3, the 3,000-gallon tank. NN-02 could not have been removed in 2006. Please correct the text.
p. 10-4, §10.1, ¶2	NN-03 and OT10-3, were closed under the CTDEEP UST Closure Guidance, not RCRA as noted in the Executive Summary. Also NN-02 was closed in 1999, not 2006. Please correct. The OT-10 closure documents state that the oil-water separator was disposed off Site. Therefore, the third sentence that states that the oil-water separator remains in service is not correct. Section 10.2.2 also states that the oil water separator no longer remains and that the dump pad is now a closed system providing secondary containment. Please correct the text accordingly.
p. 11-1, §11.2, ¶1	Add a fourth bullet: “Determine the need for an ecological screening evaluation based surface soil contaminant concentrations.”
p. 11-2, §11.2	The fourth bullet, PSQ4, needs to remain as: “Do target analyte concentrations in surface soil support previous assumptions of no ecological risk?”
p. 11-4, §11.5, ¶1	The reference to Section 10.3 should be changed to Section 11.2. Please correct.
p. 11-4, §11.5, ¶2	Please revise the decision rules to include the following (or similar requirements): <ul style="list-style-type: none">• If the PALs are not exceeded for surface or subsurface soil, then No Further Action under CERCLA will be recommended.• If the PALs are exceeded for surface or subsurface soil, then the HHRA assessment will be updated.• If the PALs are exceeded for surface soil, then an ecological risk screening will be conducted.• If the results of the updated HHRA indicate that Site 23 does not present an unacceptable risk for human health and the ecological risk screening does not result in unacceptable ecological risk, then No Further Action under CERCLA will be recommended.• If the results of the updated HHRA indicate that Site 23 presents an unacceptable risk for human health or the ecological risk screening identifies an unacceptable ecological risk, then follow-up action will be required.
p. 18-1, WS #18	This table indicates surface soil samples will be collected from the zero to two-

foot interval. Throughout the text the surface sample interval is zero to one foot. Please correct as appropriate.

- p. 18-2, §18 In the table, please clarify that two field duplicate and MS/MSD samples are required - one from OT-4 and one from OT-10.
- p. 21-1, §21 Please indicate “YES” that SOP-3-07 is modified for this project as noted in the comments column.
- p. 23-1, §23 Please include CA-615 for aqueous mercury.
- p. 28-12, §28 Please include CA-615 for aqueous mercury.
- p. 30-1, §30 Please list the analytical SOPs for aqueous and solid mercury samples.