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U S NAVY RESPONSES TO U S EPA REGION I COMMENTS ON DRAFT FINAL SAMPLING  
AND ANALYSIS PLAN DATA GAP INVESTIGATION FOR THE FORMER TANK FARM SITE  
23 FORMER TANK FARM NSB NEW LONDON CT  
12/17/2014  
U S NAVY

**NAVY RESPONSES TO EPA COMMENTS DATED DECEMBER 10, 2014  
DRAFT FINAL SAMPLING AND ANALYSIS PLAN - DATA GAP INVESTIGATION FOR THE FORMER  
TANK FARM (SITE 23) AT NAVAL SUBMARINE BASE – NEW LONDON (Dated November 2014)  
GROTON, CONNECTICUT**

**Initial Issue: December 17, 2014**

<b>NOTE:</b> A global edit to the SAP will be completed which replaces Elizabeth Middleton with Nicole Cowand	
General Comment	<p><b>Comment:</b> 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.</p> <p>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</p> <p><b>Response:</b> The specific comments below address the general comments</p>
p. I, Ex. Smy., ¶4	<p><b>Comment:</b> 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> <p><b>Response:</b> Agreed, the text will be revised to be consistent with Section 10.2.2. Tank NN-02 was removed in 1999 and replaced with OT10-3, which was subsequently removed in 2006.</p>
p. 10-4, §10.1, ¶2	<p><b>Comment:</b> 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.</p> <p>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> <p><b>Response:</b> Agreed, this paragraph will be revised to be consistent with the Executive Summary and Section 10.2.2.</p>

p. 11-1, §11.2, ¶1	<p><b>Comment:</b> Add a fourth bullet: “Determine the need for an ecological screening evaluation based surface soil contaminant concentrations.”</p> <p><b>Response:</b> Agreed, the following bullet will be added: Determine the need for an ecological screening evaluation based on surface soil contaminant concentrations.</p>
p. 11-2, §11.2	<p><b>Comment:</b> The fourth bullet, PSQ4, needs to remain as: “Do target analyte concentrations in surface soil support previous assumptions of no ecological risk?”</p> <p><b>Response:</b> Agreed, the fourth bullet PSQ4 will be reinserted as: Do target analyte concentrations in surface soil and site setting support previous assumptions of no ecological risk?</p>
p. 11-4, §11.5, ¶1	<p><b>Comment:</b> The reference to Section 10.3 should be changed to Section 11.2. Please correct.</p> <p><b>Response:</b> Agreed, the reference will be corrected to Section 11.2</p>
p. 11-4, §11.5, ¶2	<p><b>Comment:</b> Please revise the decision rules to include the following (or similar requirements):</p> <ul style="list-style-type: none"> <li>• If the PALs are not exceeded for surface or subsurface soil, then No Further Action under CERCLA will be recommended.</li> <li>• If the PALs are exceeded for surface or subsurface soil, then the HHRA assessment will be updated.</li> <li>• If the PALs are exceeded for surface soil, then an ecological risk screening will be conducted.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p><b>Response:</b> Agreed, the decision rules will be revised to include the five bullets as follows:</p> <ul style="list-style-type: none"> <li>• If the PALs are not exceeded for surface or subsurface soil, then No Further Action under CERCLA will be recommended.</li> <li>• If the PALs are exceeded for surface or subsurface soil <u>and the results are not considered to be a background condition</u>, then the HHRA assessment will be updated.</li> <li>• If the PALs are exceeded for surface soil <u>and the results are not considered to be a background condition</u>, then an ecological risk screening will be conducted.</li> <li>• 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.</li> <li>• 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</li> </ul>

	required.
p. 18-1, WS #18	<p><b>Comment:</b> 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> <p><b>Response:</b> Agreed, the sample depth for surface soil samples will be modified to 0-1 foot in WS #18.</p>
p. 18-2, §18	<p><b>Comment:</b> 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> <p><b>Response:</b> Per Worksheet 12, only one field duplicate and one MS/MSD are required for every 20 field samples. The OT-4 and OT-10 areas are in close proximity, the soil types are expected to be the same, and the samples for OT-4 and OT-10 (total of 20 between the two areas) are expected to be collected in a single sample event / batch. Therefore, no change to this table is necessary.</p>
p. 21-1, §21	<p><b>Comment:</b> Please indicate "YES" that SOP-3-07 is modified for this project as noted in the comments column.</p> <p><b>Response:</b> Agreed, "YES" will be indicated in the column for SOP 3-07</p>
p. 23-1, §23	<p><b>Comment:</b> Please include CA-615 for aqueous mercury</p> <p><b>Response:</b> Agreed, CA-615 for aqueous mercury will be included</p>
p. 28-12, §28	<p><b>Comment:</b> Please include CA-615 for aqueous mercury</p> <p><b>Response:</b> Agreed, CA-615 for aqueous mercury will be included</p>
p. 30-1, §30	<p><b>Comment:</b> Please list the analytical SOPs for aqueous and solid mercury samples</p> <p><b>Response:</b> Agreed, the SOPs for aqueous and solid mercury will be included</p>