



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



March 9, 1994

Mr. David Miu  
NORTHNAVFACENGCOM, code 1823/DM  
10 Industrial Way  
Mail Stop 82  
Lester, PA 19113-2090

Re: Briefing Document Proposed Interim Remedial Actions

Dear Mr. Miu:

Staff of the Permitting, Enforcement, and Remediation Division of the Connecticut Department of Environmental Protection Agency (CTDEP) have reviewed the Briefing Document entitled Proposed Remedial Actions Naval Submarine Base-New London Groton, Connecticut dated May, 1993. The briefing document was prepared by Atlantic Environmental Services, Inc. on behalf of North Division Naval Facilities Engineering Command. The following comments address CTDEP concerns in regard to items found in the briefing document:

**G neral Comments**

**1. Concept**

The general concepts of the Interim Remedial Action (IRA) program as summarized in the briefing document appear to be reasonable. The CTDEP reserves the right for further comment upon the Work Plan Interim Designs, the Focused Feasibility Studies and the Treatability Studies, none of which have been received by this Department as of this writing.

**2. ARARs/TBC**

The greatest concern to the CTDEP is that Connecticut State statutes and regulations are correctly identified, specified in work plans, and complied with. A copy of draft soil and groundwater clean-up standard regulations is attached to these comments for your perusal. The CTDEP requests that these draft regulations be utilized in planning the remedial objectives for the operable units listed in this briefing document and other sites within the Naval Submarine Base.

**3. Test Methods/Results**

Throughout the briefing document soil sample and monitor well analyses results were not always assigned numeric values. They were sometimes reported only as exceeding "Applicable or Relevant and Appropriate Requirements" (ARARs) and

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"To-Be-Considered" (TBC) values. In the future, please indicate both the ARAR/TBC value and the specific sample analyses results. Presumably, results were reported in this manner because this document is only a summary. Please be advised that the Extraction Procedure Toxicity Characteristic (EPTC) or "EP-Tox" has been superseded by the Toxicity Characteristic Leaching Procedure (TCLP) per 40 CFR Part 261 et al., effective September 25, 1990.

#### **Specific Comments**

##### Page 11, paragraph two

Please correct gravel deposited by "gravel meltwater" to deposition by glacial meltwater.

##### Page 36, paragraph five

Please correct "the hydraulic upgradient" to hydraulic gradient.

##### Page 41, paragraph two

It is noted that the DDT concentration was above the TBC value. Please indicate the TBC value used to make this determination and provide the numeric concentration of DDT in the referred sample.

##### Page 43, paragraph two

It is our understanding that additional data will be collected prior to the implementation of the Interim Remedial Actions (IRA). The CTDEP reserves final comment on the IRA until this data has been provided.

##### Page 45, Chemical Specific ARARs/TBC

The CTDEP requests that a soil clean-up guideline of 0.015 ppm based on TCLP for Lead be utilized per the State's Water Quality Standards (WQS), adopted pursuant to section 22a-426 of the Connecticut General Statutes. The fact that the WQS have been consistently utilized as ARARs at Federal Superfund sites throughout Connecticut has been documented in a CTDEP letter dated May 12, 1993 from Adam Sullivan to Deborah Stockdale (the former Navy Remedial Project Manager). In addition, CTDEP requests that a clean-up guideline of 0.01 ppm based on TCLP, for Selenium be considered a TBC value per the Draft Proposed Groundwater Protection Criteria (for) Inorganic Compounds, December, 1993. The CTDEP recognizes that these regulations have yet to be adopted and

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are not currently enforceable. However, compliance with these standards is consistent with CTDEP's goal of removing sources of pollution, eliminating risks to human health, and restoring water quality within the State of Connecticut.

Page 48, Chemical Specific ARARs/TBC

Please amend the ARAR/TBC for Lead as described in the preceding paragraph.

If you have any questions in regard to these comments please do not hesitate to call me or Christine Lacas at (203) 566-5486.

Sincerely,



Mark Leone, Environmental Analyst  
Water Management Bureau / PERD  
Connecticut Department of Environmental Protection

MRL: mrl

ATTACHMENTS

cc: Barry Giroux, Atlantic Environmental Services, Inc.  
Paul Marchessault, EPA Region 1