



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

April 18, 1994

David Miu, RPM
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

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To	From
Dept./Agency	Phone #
Fax #	Fax #

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

RE: EPA's Comments on the Halliburton NUS Corporation letter
Dated March 28, 1994

Dear Mr. Miu:

The purpose of this letter is to transmit EPA's comments on the subject letter concerning Investigation-Derived Waste (IDW) disposal at the Naval Submarine Base - New London, Groton, Connecticut.

The referenced letter recommends disposal practices that are consistent with the objectives presented in EPA guidance document "Management of Investigation-Derived Wastes During Site Inspections", dated May 1991. The Navy should be aware that state regulations may be more stringent than federal and any final disposal decisions should be consistent with state regulations.

Discharge of pumping test water, decontamination water and well development and purge water into the base sewer system is one of the above referenced guidance document's recommended disposal methods provided that the discharge is in conformance with the POTW's discharge permit and that the discharge in conformance with the sewer discharge permit. This permit can be an amendment to the sewer discharge permit application on file now at the EPA and must be "in hand" prior to conducting the pump test. As the approval usually takes some time to secure, you should have been coordinating with Mr. Richard "Skip" Hull, Water Division EPA, at (617) 565-4881 who is working to develop other pre-treatment permits for New London. He can advise you as to the analysis and contaminate levels that will be required to be met prior to disposal.

Any containerized IDW must, at a minimum, be accumulated in accordance with State and Federal container management requirements for hazardous waste (i.e., drums in good condition, closed containers, etc.,) promulgated under the Resource



Rec'd April 26, 94.

Conservation and Recovery Act (RCRA). This method of storage is a protective measure until a proper hazardous waste determination is conducted on the IDW to determine whether any additional RCRA requirements may apply.

The drill cuttings to be spread onto the ground at the Area A Landfill need to be characterized within a sufficient time period prior to the capping of the Landfill. The actual spreading of the cuttings must be timed to correspond with the construction of the cap to minimize the potential exposure due to volatilization of contaminants.

If you have any questions regarding these comments, you should feel free to call me at (617) 573-5736.

Sincerely,



Christine Williams, RPM
Federal Facilities Superfund Section

cc. Mark Leone, CT DEP
Skip Hull, EPA/Water w/enclosure
Ken Rota, EPA/RCRA w/enclosure
Mary Sanderson, EPA w/enclosure