



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



April 18, 1994

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

Re: Procedures for Disposal of Investigation-Derived Wastes

Dear Mr. Miu:

Staff of the Permitting, Enforcement, and Remediation Division (PERD) of the Connecticut Department of Environmental Protection (CTDEP) have reviewed the letter regarding procedures for disposal of investigation-derived wastes at the NLON SUBBASE dated March 28, 1994. The letter was prepared by Halliburton NUS Corporation on behalf of North Division Naval Facilities Engineering Command. Listed below are staff comments pertaining to the letter:

Comments

1. Pumping Test Water pg.3, paragraph 1

It is required that groundwater samples be tested for certain metals in addition to the target compound list (TCL) volatile and semi-volatile compounds prior to disposal to the base sewer system. This issue was discussed with and acknowledged by Matt Cochran of Halliburton NUS in a telephone conversation on April 8, 1994. The Town of Groton POTW and the permitting section of the CTDEP PERD have been apprised of this issue by Halliburton NUS.

2. Well Development and Purge Water pg. 3, paragraph 3

The Halliburton NUS proposal to discharge monitor well purge water to the ground is not in conformance with state Applicable, Relevant and Appropriate Requirements (ARARs) / To-Be-Considered Values (TBCs) including; The Connecticut Water Quality Standards (WQS), Section 22a-430 of the Connecticut General Statutes, and the April, 1993 Proposal For The Connecticut Clean Up Standard Regulations. The Connecticut WQS as adopted January, 1992, indicate that the State's goal in GB/GA areas is to restore the groundwater to drinking water quality. Therefore, the disposal of contaminated or potentially contaminated monitor well purge waters to the ground at this site is not acceptable to CTDEP.

Discharges of chemical constituents are subject to the standards of Section 19-13-B102 of Connecticut Public Health Code, advisories of the Department of Health Services (DOHS) and primary and secondary Standards of the Federal Safe Drinking Water Act.

Rec'd April 25, 94.

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An allowable discharge of the monitor well purge waters may be to the base sanitary sewer system and would require compliance with the CTDEP emergency discharge authorization regulations. A copy of these regulations is attached; please contact Don Gonyea of the CTDEP Water Management Bureau/PERD for further information at (203) 566-5903.

3. Drill Cuttings pg. 4

Disposal of drill cuttings either on or off-site are subject to Sections 22a-209-7 (o), (r), (u) of the Regulations of Connecticut State Agencies (RCSA). A copy of these regulations is attached.

4. Discharge Permits

Further information on the discharge of investigation derived wastes (water) is discussed in the attached memo from Gary Leavitt of the CTDEP Water Management Bureau/PERD.

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

Sincerely,



Mark Leone, Environmental Analyst
Bureau of Water Management
Permitting, Enforcement, & Remediation Division

MRL: mrl

ATTACHMENTS

cc: Matt Cochran, Halliburton NUS
Christine Williams, EPA Region 1

STATE OF CONNECTICUT
INTERDEPARTMENTAL MESSAGE
BUREAU OF WATER MANAGEMENT

TO: Marc Leone, Environmental Analyst II April 7, 1994
DEP/Water Management Bureau, 79 Elm Street, Hartford, CT 06106-5127

FROM: Gary Leavitt, Senior Sanitary Engineer Ext. 2238
DEP/Water Management Bureau, 79 Elm Street, Hartford, CT 06106-5127

SUBJECT: Letter 3/28/94 Halliburton to Dave Miu, Navy

Halliburton has recommended, in their letter, disposal methods for wastewaters generated by pump tests to be conducted at subbase NLON.

Halliburton has applied for a Temporary Authorization for wastewaters generated by:

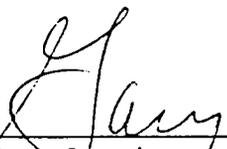
- 1) 72 hour pump test
- 2) steam clean of equipment
- 3) development and purge of sample wells

We are processing this request and have asked for additional sampling to be submitted to cover other constituents that may exist in the contaminated waters.

Halliburton has indicated that additional purge and development waters will be generated June '94 as a result of additional sampling at the site. The proposal for this water to be dumped on the ground is not permissible. This water should be disposed of as indicated above.

As a result of this contractors request for discharge over several months and pursuant to my letter to Atlantic Environmental, we should set up a meeting to discuss the timing and duration of proposed discharges. The Temporary Authorization that will be issued is only good for 30 days and we may not be able to continuously renew this instrument to cover discharges of this sort. It is expected that an application for an individual permit for discharges that will be generated on site, as a result of all activities, can be filed at this time by the Navy.

If you have any questions on the above please contact me at Ext. 2238.



Gary Leavitt