



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



May 31, 1994

Mr. David Miu  
NORTNAVFACENGCOM, Code 1823/DM  
10 Industrial Way  
MAIL STOP 82  
LESTER, PA

RE: Preliminary Comments on Draft Focused Feasibility Studies

Dear Mr. Miu:

Staff of the Permitting, Enforcement, and Remediation, Division (PERD) of the Connecticut Department of Environmental Protection (CTDEP) have reviewed the Draft Focused Feasibility Studies (FFS) for the Area A Landfill, Spent Acid Storage & Disposal Area, DRMO, and the Area A Downstream/OBDA at the Naval Submarine Base- New London, Connecticut (NSB-NLON). These documents were prepared by Atlantic Environmental Services, Inc. (Atlantic) on behalf of Northern Naval Facilities Engineering Command (NORTHDIV).

Preliminary staff comments pertaining to these studies are listed below per your request. An extension to June 16, 1994 is requested for additional comments.

**General Comments**

On May 6, 1994 representatives from EPA Region 1, NORTHDIV, and Atlantic, met with CTDEP to discuss the referenced documents and State of Connecticut Regulations for conducting work at the four areas of contamination selected by the Navy for accelerated remedial action this year.

While CTDEP staff found the proposed interim remedial actions for the four areas of contamination to be reasonable in general, they had several concerns. The "hot spot" removal at these four areas and subsequent capping of the DRMO and the Area A Landfill will lessen risks to human health from contact with contaminated soils and provide some protection to the environment.

CTDEP is concerned that these interim actions only partially address source removal. They do not address the impacts of any remaining saturated wastes that may affect ground water quality, surface water quality, wetlands and the Thames River.

It was mentioned both in the FFS and the most recent Technical Review Committee (TRC) meeting that a ground water investigation is to be conducted at these sites. CTDEP requests that the schedule for completion of this investigation and any plans for

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implementation of a ground water remediation program be provided to them for review.

Soil clean up standards for PCBs, an acknowledged long standing disagreement between NORTHDIV and CTDEP, was discussed. The NORTHDIV's proposal of "hot spot" removal to the EPA- TSCA level of 10 ppm for PCBs at the DRMO, while leaving an average of 2 ppm beneath the cap, is being considered by the CTDEP PCBs Program. CTDEP's position on this matter will be addressed in the additional comments to be forwarded at a later date.

A target level for the remediation of soils contaminated with lead at the DRMO, of 500 ppm, was proposed by EPA as a compromise between the 1000 ppm target level proposed by NORTHDIV and the TCLP result of 0.015 ppm requested by CTDEP. This compromise remains acceptable to the CTDEP.

We understand that Atlantic is evaluating this option and that NORTHDIV has requested additional time, to estimate the incremental increase in excavation and disposal costs incurred when utilizing the more stringent clean up level. When Atlantic and NORTHDIV have made a decision on this issue, please notify us.

Since the groundwater contamination has not yet been fully characterized at this site, it is understood that further remedial actions may be warranted.

Target levels for removal of soils and sediments contaminated with DDT and its degradation products were discussed. The CTDEP will rely upon the expertise provided by EPA on this issue.

Specific comments are in the process of being compiled in an effort to meet the June 16, 1994 extension date requested.

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

Sincerely,



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

MRL:mrl

CC: Christine Williams, EPA Region 1  
Barry Giroux, Atlantic Environmental Services, Inc.