



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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N00129.AR.000899
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November 6, 2001

Mark Evans, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Comments on First Five-year Review Report for CERCLA Sites, Revision 1 for the Naval Submarine Base New London in Groton, CT

Dear Mr. Evans:

EPA reviewed the *First Five-Year Review Report for CERCLA Sites at Naval Submarine Base-New London Groton, Connecticut* dated October 2001. The technical review focused on adherence to the guidance document, *Comprehensive Five-Year Review Guidance*, EPA 540-R-01-007, dated June 2001. The document was also reviewed to assess appropriate revisions in response to earlier EPA comments and the discussion at the August 8, 2001 meeting. Detailed comments are provided in Attachment A.

The Five-year review report is generally consistent with recent EPA guidance, *Comprehensive Five-Year Review Guidance*, June 2001. However, EPA believes that the evaluation of whether completed remedial actions attain ARARs must be enhanced. I trust that these revisions can be made in time to meet the December 9, 2001 deadline.

I look forward to working with you and the Connecticut Department of Environmental Protection to complete all necessary remedial action at the base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT
Dick Conant, NSBNL, Groton, CT
David Peterson, USEPA, Boston, MA
Jennifer Stump, Gannett Fleming, Harrisburg, PA

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ATTACHMENT A

<u>Page</u>	<u>Comment</u>
§1.3, p. 1-7	The community involvement discussion in this section does not indicate that a 'notice of availability' will be posted in a local newspaper. A copy of this notice should be included with the final version of the Five-Year Review Report.
§2.7, p. 2-6	The revised five-year review document recommends that Site 1 CBU drum storage area be eliminated from the five-year review process in the future. If this recommendation is implemented, the Navy should discuss the CBU drum storage area as part of the Area A Landfill background information in the second five-year review document. No revision to the current first five-year review document is needed to address this issue.
Table 4-2	In response to an earlier EPA comment, this table of chemical specific ARARs for site 3 Area A Downstream was included in the document. The discussion of ARAR attainment must be enhanced in order to be consistent with the recent guidance. For example, the statement "this requirement is no longer applicable" in reference to the federal water quality criteria should be changed to "the remedy attains water quality criteria in the wetland surface water." Also, the portion of the table evaluating the CT soil remediation standards should indicate that the groundwater aquifer is expected to meet the standards for the groundwater classification after completion of the groundwater OU activities.
Table 4-3	The location specific ARARs table does not evaluate attainment of federal wetland requirements. EPA's earlier comment requested that there be a discussion of whether the wetland restoration is successfully meeting federal and state wetland requirements.
§13.1, p. 13-1	The Draft Removal Action Report for Over Bank Disposal Area Northeast dated August 2001 is not listed in the event chronology. This report should be added to the chronology.
Table 25-1	The wording of the deficiency for site 9 (OT-5) needs clarification. A post removal action report was completed in 1994. Is the intent of the statement that a removal action occurred and a NFA ROD for the soil OU is recommended? A NFA ROD is also recommended for Sites 16 and 18, but these sites are not listed in Table 25-1. Please clarify and revise the table as appropriate.
Appendix B	The response to EPA comments indicated that page 5 of the Area A Landfill Checklist would be updated as follows: " <i>Perimeter fencing, but gates left open and military personnel can access site. Signs posted at entrances limiting access to authorized users and instructing no one to dig at the site because of the presence of a cap.</i> " This addition to the checklist is not apparent in Appendix B. This information can be added to Appendix B in the final version of the report.