



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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April 26, 2004

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: Basewide Groundwater Operable Unit Remedial Investigation Update/Feasibility Study Report

Dear Mr. Evans:

EPA reviewed the *Basewide Groundwater Operable Unit Remedial Investigation Update/Feasibility Study Report* for Naval Submarine Base New London, Groton, Connecticut, dated March 2004. The review checked for revision of the October 2003 draft document in accordance with the February 19, 2004 Navy response to EPA comments and discussions during the February 3, February 26, and March 5, 2004 conference calls. Detailed comments are provided in Attachment A.

I look forward to working with you and the Connecticut Department of Environmental Protection to protect the groundwater resources of the Naval Submarine 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
Melissa Griffin, NSBNL, Groton, CT
David Peterson, USEPA, Boston, MA
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ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. ES-16, §ES-4.1	Throughout this section there are no ARARs for sites with only petroleum contamination. Instead, the Navy can discuss State-mandated standards - ARARs are standards that are enforceable under CERCLA. So replace the term "ARARs" throughout this chapter for petroleum contaminated soils.
p. ES-19, §ES-4.1.5	If the NCP analysis is going to be retained, explain that the State has determined that using the NCP format for the analysis meets State standards for analysis. Also, state that compliance with cleanup standards is enforceable by the State, not under CERCLA. (See previous comment about not using the term "ARARs.")
p. ES-29, ¶1	In the last sentence, concerning the lack of any location-specific ARARs, was a map of the federal/state coastal zone consulted to determine whether the Sites are not within the coastal zone? (In some states the coastal zone may include the entire town that borders the coastal waterway). Also, if the Navy is saying that its actions are affecting the Thames River (see under the Endangered Species Act), then the work is affecting the coastal zone. Please revise for internal consistency.
p. ES-40, ¶7	In the third sentence, regarding no location-specific ARARs, see previous comment about the federal/state coastal zone standards.
Table 4-1	CWA AWQCs are "Relevant and appropriate" not "To be considered." Promulgated regulations cannot be TBCs.
Table 4-2	Was a map of the federal/state coastal zone consulted to determine whether the Sites are within the coastal zone? (In some areas the coastal zone includes the entire town that borders the coastal waterway). Also, if the Navy is saying that its actions are affecting the Thames River (see under the Endangered Species Act), then the work is affecting the coastal zone.
Table 4-3	RCRA transportation standards are not ARARs.
Chapter 5.0	There are no ARARs for sites with only petroleum contamination. Instead, the Navy can discuss State-mandated standards. ARARs are standards that are enforceable under CERCLA. Replace the term "ARARs" throughout this chapter for petroleum contaminated soils.

- p. 5-12, §5.2.5 If the NCP analysis is going to be retained, explain that the State has determined that using the NCP format for the analysis meets State standards for analysis. Also, state that compliance with cleanup standards is enforceable by the State, not under CERCLA. (See previous comment about not using the term “ARARs.”)
- p. 5-39, ¶1 In the last sentence, regarding no location-specific ARARs, see previous comment about the federal/state coastal zone standards.
- Tables 5-5 to 5-8 In title change “ARARs and TBCs” to “Standards.”
- Tables 5-9 to 5-11 If federal/state coastal zone is present, add Location-specific Tables.
- p. 6-21, ¶3 In the last sentence, there may be location-specific ARARs if in the coastal zone or if work might effect endangered species in the Thames River (see previous discussion). There are action specific ARARs for monitoring (see pages 5-38 to 39 - ARARs for GW2). Also, if the institutional controls include standards for construction worker, then those standards are action-specific ARARs. The standard for the permeable cover is also action-specific.
- p. 6-22, ¶6 In the second sentence, there may be location-specific ARARs if in the coastal zone or if work might affect endangered species in the Thames River (see previous discussion).
- p. 6-38, ¶1 In the last sentence, there may be location-specific ARARs if in the coastal zone or if work might affect endangered species in the Thames River (see previous discussion).
- p. 6-40, ¶3 In the last sentence, there may be location-specific ARARs if in the coastal zone or if work might affect endangered species in the Thames River (see previous discussion).
- p. 6-45, ¶3 In the third sentence, there may be location-specific ARARs if in the coastal zone or if work might affect endangered species in the Thames River (see previous discussion).
- Tables 6-6 and 6-10 Add Location-specific tables if coastal zone and/or state endangered species are applicable.
- Table 6-13 Section 402 of the Clean Water Act applies if the treated water were discharged into a waterbody, so change the Evaluation/Action to be Take text accordingly. Water going to a POTW is covered under Section 403.