

REVISED FINAL

**RESPONSES TO EPA's JULY 31, 2006, AUGUST 8, 2006, OCTOBER 18, 2006, AND  
OCTOBER 30, 2006 COMMENTS AND REBUTTALS ON THE  
DRAFT SECOND FIVE-YEAR REVIEW FOR CERCLA SITES  
NAVAL SUBMARINE BASE-NEW LONDON, GROTON, CONNECTICUT**

**DECEMBER 12, 2006**

**GENERAL COMMENTS – July 31, 2006 Cover Letter**

**General Comment 1:**

EPA disagrees with the protectiveness statement on page vi of the Second Five Year Review primarily because there are several outstanding remedial actions that are not yet complete. EPA recommends that a "Protectiveness deferred" statement (pursuant to Section 4.5.1 of the guidance) be incorporated into the protectiveness statement for the remedies at OU2, OU4, OU9, OU11, and OU12 until further information is obtained. In accordance with EPA guidance, please describe the actions that will be taken and the time frame to complete them.

**Response:**

Agree with clarification. The Protectiveness Statement on page vi will be changed to the following:

"Remedial actions to address immediate or potential future threats from exposure to soil and sediment have been implemented at Sites 1, 2 (Area A Landfill), 3, 4, 6, 7, 8, 9, 14, 15, and 20 at NSB-NLON. The remedial actions that were completed at Sites 1 (OU1), 3 (OU3), 4 (OU10); 7 (OU8), 9, 14 (OU8), 15 (OU6), and 20 (OU7) are protective of human health and the environment. The remedial actions taken at Sites 2 (OU1), 6 (OU2), and 8 (OU5) are currently protective of human health and the environment because the landfill cap systems that were installed provide barriers to the waste stored in the landfills which eliminate direct contact and minimize infiltration of precipitation through the waste and contaminant migration to the underlying groundwater. In order for these remedies to be protective in the long-term, groundwater monitoring, operation and maintenance, and land use controls must be maintained at the sites. Groundwater monitoring programs are ongoing at the sites to monitor contaminant trends and confirm the protectiveness of the soil remedial actions completed at the sites. An operations and maintenance program has been implemented by the Navy at these sites. The Navy has also instituted an IR Site Use Restriction Instruction that restricts ground surface disturbance of soils and any subsurface disturbance of soils and/or groundwater at IR sites.

Final remedies have not been selected for the groundwater at Sites 2 (Area A Landfill) (Part of OU9) and 8 (OU5); therefore, a protectiveness determination cannot be made at this time. Groundwater monitoring is currently being

waterSupply/lakepond/publications.htm#factsheets). Shoots are sent upward through the soil from these rhizomes, and the aggressive growth habit of this plant could damage the landfill cap, causing infiltration of water through the cap. The nearby presence of a robust source of wind-blown seed also threatens the success of the Area A Downstream wetland restoration. A variety of control methods are available for *Phragmites*, and these control technologies should be employed to control *Phragmites* in the Area A landfill, Area A Downstream, and the Area A Wetland.

**Response:**

Agree. The Navy intends to improve management of *Phragmites* at the Area A Landfill (Site 2) and Area A Downstream (Site 3) under the Operations and Maintenance (ECC) and Natural Resources (Environmental Department at NSB-NLON) programs. Control activities will be conducted annually under the Operations and Maintenance program, while activities will be conducted more frequently under the Natural Resources program as *Phragmites* growth issues are identified during routine inspections. The Navy, with the assistance of the regulators, will continue to evaluate the most effective ways to manage *Phragmites* growth.

The Navy agrees that the *Phragmites* in the Area A Wetland will continue to provide a source of seeds to the surrounding sites, but the *Phragmites* currently provide a natural vegetative cover over the dredge spoils in the wetland that prevents erosion and potential contaminant migration. Therefore, the Navy does not intend to control *Phragmites* growth in the Area A Wetland.

The following changes will be made to the text of the Five-Year Review to make it clear that *Phragmites* growth is an issue that needs to be addressed:

p. 2-20, Section 2.5.4, second bullet:

“Sediment, debris, and vegetation (*Phragmites*) clog portions of the drainage channels (i.e., A, B, C, and D). The affected portions of the channels are shown on Figure 2-1. If the sediment and debris are not removed, it may result in surface water overtopping the channels and flowing across the cap system. Continued *Phragmites* growth may result in the root system penetrating the cap because the roots can penetrate up to two meters.”

Table 2-5, Line 1:

“O&M of cap system [vegetation (*Phragmites*, trees, etc.), sediment, and asphalt cracks]”

included in the discussion and evaluation for the 5-year review. It's a routine practice to look at this pathway now at 5-year review at all sites. EPA assumed that using this draft guidance to qualitatively discuss this pathway will not result in any change of the risk conclusions because there is neither a complete pathway nor high levels of VOCs. However, it should be evaluated in the 5-year review as a change in guidance.

**Response to EPA Rebuttal**

Rebuttal noted. A reference to the guidance will be added.

**Additional EPA Rebuttal on October 18, 2006**

Please list the following new risk guidances and explain that these new standards will be used in future 5-year reviews and remedy selections:

- Guidelines for Carcinogen Risk Assessment, EPA/630/P-03/001F, March 2005
- Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-03/003F, March 2005

**Response to Additional EPA Rebuttal**

Rebuttal noted. References to the two additional guidance will be added as requested.

**Specific Comment 2: p. 2-6, §2.3.1**

Please correct the first sentence in the fourth bullet on the page to read "... promote runoff and prevent run-on."

**Response:**

Agree. The requested text change will be made.

**Specific Comment 3: p. 2-22, §2.6**

In the last sentence in the first paragraph of the second bullet, please correct the section reference from 2.5.3 to 2.5.4.

**Response:**

Agree. The requested section reference will be changed to 2.5.4.

(CMAA) control for Area A Landfill, please append it to the Five Year Review Report.

**Response to EPA Rebuttal**

The new procedure will be included in the revised SOPA (ADMIN) New London Instruction 5090.18B. The Navy issued a draft version of the revised instruction for regulator review in mid-October 2006 and subsequent versions in November 2006. It is likely that the final version of the instruction will be available prior to issuing the final Second Five-Year Review Report. The EPA will be provided with a final version of the instruction when it is available.

**Specific Comment 6: Table 2-3**

This table presents groundwater monitoring criteria and should therefore apparently be titled OU9 rather than OU1. Please correct as appropriate (*see also* the Table of Contents for this section).

**Response:**

Disagree. Table 2-3 summarizes the Action Specific ARARs for the soil OU (OU1). These were taken directly from the ROD. No changes are required.

**EPA Rebuttal During November 2, 2006 Technical Meeting and November 29, 2006 Conference Call:**

The comment should have referred to Table 2-4.

The Federal AWQCs should be removed from Table 2-4.

**Response to EPA's Rebuttals**

Agree. OU1 will be changed to OU9 in the title of Table 2-4. The Table of Contents will also be updated.

Based on discussions during the November 29, 2006 conference call, it was agreed that Connecticut WQs are applicable criteria for sites at Naval Submarine Base - New London, but not the federal AWQCs. Therefore, Federal AWQCs will be removed from Table 2-4. Footnote 2 will also be removed from the table and the remaining footnotes will be renumbered as appropriate.

**Specific Comment 7: Table 2-4**

Please correct the values in the columns for federal AWQC using the values listed on

(open and unprotected), suggests that the current protectiveness of the remedy is in jeopardy because groundwater can be impacted by discharges into the unprotected wells. Please change N to Y for current protectiveness because of the current condition of several monitoring wells.

**Response:**

Agree. The “N” will be changed to “Y” for current protectiveness because of the current condition of several monitoring wells. Once the wells are either properly abandoned or improved, the protectiveness could be changed back to Y.

**Specific Comment 9: p. 2-25, §2.7**

Please add the following bullet:

“All badly damaged monitoring wells should be repaired or abandoned without delay so the current protectiveness of the remedy cannot be questioned. Based on the October 2005 inspection and the April 2006 five-year inspection, those wells include § 2LMW17D, 2LMW18D, 2LMW8D or 8S (to be verified), and 2LMW20D. For the record, note also that 4MW1S, which is a stick-up well, is leaning but based on information provided by the sampling contractor, the well is still functional.”

**Response:**

Agree with qualification. The third bullet on p. 2-25, §2.7 will be changed to the following:

“...appropriate. Develop and implement a well abandonment program to eliminate wells that are no longer required for the monitoring program. The wells that should be abandoned at Site 2 include 2LMW8S, 2LMW18S, 2LMW18D, 2LMW20D, and 2LMW34DS.”

The wells listed above were taken from the October 2005 inspection report and the April 2006 five-year review site inspection.

**Specific Comment 10: p. 4-9, §4.4**

In the second bullet, as stated in the first five-year review report, a minor depression does exist 50-60 feet southwest of Building 491. This depression was photo-documented by EPA during the October 2005 inspection. This depression is located along the line of the large crack that was repaired at this same location. Please edit the report accordingly.

In the third bullet, EPA photographs of 6MW11D taken October 2005 and April 2006 do

**Specific Comment 12: p. 4-17, §4.5.4**

Regarding the bullet at the top of the page: For the record, equipment and material adjacent to Building 491 was moved during a previous annual inspection of the Site and no evidence of well 6MW4S was found. This well has apparently been abandoned. The Navy should review the construction records to determine whether the abandonment was documented but overlooked.

Please add another bullet noting that well 6MW7S is located in a depression and water periodically covers the well. This well should be abandoned if it is no longer used in the monitoring program.

**Response:**

The Phase I RI, Phase II RI, and the Time-Critical Removal Action Report were reviewed. Monitoring well 6MW4S was sampled only once during the Phase I RI. The well falls outside the limits of the soil removal action, but inside the limits of the cap that was installed after the removal action was completed. It is likely that the well was abandoned during the removal action and cap installation but no records are available to document the abandonment. The Navy will consider the well as abandoned into the future.

A well abandonment program will be developed for NSB-NLON. Monitoring well 6MW7S will be added to the monitoring well list included in the program.

**Specific Comment 13: p. 4-19, §4.6**

Regarding the second last bullet, previous discussion of the future DRMO uses in this report indicated that a possible future use of the DRMO was as a parking lot for the Yacht Club. Please edit this bullet to address this.

**Response:**

Agree. The last sentence in the bullet will be changed to the following:

“The land use of the DRMO may change in the future to a parking lot for a Yacht Club. The change in site conditions should not effect exposure pathways (i.e., there are no new contaminants, sources, or direct routes of exposure).”

**Specific Comment 14: Table 4-2**

At several locations in this table the text states that the requirement is no longer applicable because the remedy has been constructed. However, if wells are to be abandoned, it may be premature to state that the requirements are no longer

RESPONSES TO EPA's JULY 31, 2006, AUGUST 8, 2006, OCTOBER 18, 2006, AND  
OCTOBER 30, 2006 COMMENTS AND REBUTTALS ON THE  
DRAFT SECOND FIVE-YEAR REVIEW FOR CERCLA SITES  
NAVAL SUBMARINE BASE-NEW LONDON, GROTON, CONNECTICUT

DECEMBER 12, 2006

**GENERAL COMMENTS – July 31, 2006 Cover Letter**

**General Comment 1:**

EPA disagrees with the protectiveness statement on page vi of the Second Five Year Review primarily because there are several outstanding remedial actions that are not yet complete. EPA recommends that a "Protectiveness deferred" statement (pursuant to Section 4.5.1 of the guidance) be incorporated into the protectiveness statement for the remedies at OU2, OU4, OU9, OU11, and OU12 until further information is obtained. In accordance with EPA guidance, please describe the actions that will be taken and the time frame to complete them.

**Response:**

Agree with clarification. The Protectiveness Statement on page vi will be changed to the following:

"Remedial actions to address immediate or potential future threats from exposure to soil and sediment have been implemented at Sites 1, 2 (Area A Landfill), 3, 4, 6, 7, 8, 9, 14, 15, and 20 at NSB-NLON. The remedial actions that were completed at Sites 1 (OU1), 3 (OU3), 4 (OU10), 7 (OU8), 9, 14 (OU8), 15 (OU6), and 20 (OU7) are protective of human health and the environment. The remedial actions taken at Sites 2 (OU1), 6 (OU2), and 8 (OU5) are currently protective of human health and the environment because the landfill cap systems that were installed provide barriers to the waste stored in the landfills which eliminate direct contact and minimize infiltration of precipitation through the waste and contaminant migration to the underlying groundwater. In order for these remedies to be protective in the long-term, groundwater monitoring, operation and maintenance, and land use controls must be maintained at the sites. Groundwater monitoring programs are ongoing at the sites to monitor contaminant trends and confirm the protectiveness of the soil remedial actions completed at the sites. An operations and maintenance program has been implemented by the Navy at these sites. The Navy has also instituted an IR Site Use Restriction Instruction that restricts ground surface disturbance of soils and any subsurface disturbance of soils and/or groundwater at IR sites.

Final remedies have not been selected for the groundwater at Sites 2 (Area A Landfill) (Part of OU9) and 8 (OU5); therefore, a protectiveness determination cannot be made at this time. Groundwater monitoring is currently being

conducted to monitor contaminant trends and confirm the protectiveness of the soil remedial actions completed at the sites. Final remedies will be selected for the groundwater when sufficient data has been collected under the monitoring programs.

The selected remedy of groundwater monitoring and land use controls is currently being implemented for the groundwater at Sites 3 and 7 (Part of OU9). The remedy is expected to be protective of human health and the environment when concentrations decrease to below the remedial goals by natural processes, and in the interim, exposure to the contaminated groundwater is being restricted with land use controls to minimize unacceptable risks.

The Navy is continuing CERCLA investigations at Sites 10, 11, 13, 17, 19, 21, 24, and 25. All of the media at these sites are included in OU4. A time-critical removal action was completed at Site 17 to address lead-contaminated soil underneath and adjacent to the building. The action involved excavation and on-site solidification of most of the contaminated soil; however, some contaminated soil was left untreated because of access issues. A protectiveness determination for these sites cannot be made until final remedies are selected and implemented. It is expected that remedies for these sites will be selected and construction begun prior to the completion of the Third Five-Year Review.

The Navy is also continuing CERCLA investigations at Sites 2 (Area A Wetland) (OU12) and Site 23 (Part of OU9). A protectiveness determination for these sites cannot be made until final remedies are selected and implemented. It is expected that remedies for these sites will be selected and construction begun prior to the completion of the Third Five-Year Review.

Investigations found that no contamination was present in the soil at Sites 16 and 18 (OU11) or the groundwater at Sites 14, 15, 18, and 20 (Part of OU9) that would result in immediate or potential future threats and NFA RODs were subsequently prepared for these sites. The selected remedies are protective of human health and the environment.”

OU11 includes Sites 16 and 18. No Further Action Records of Decision were prepared for the media at these sites. Therefore, no additional data is required for the sites and a protectiveness deferred statement is not required.

### **General Comment 2:**

EPA remains concerned about the extensive *Phragmites* growth at the Area A Landfill. The dense stand of the Common Reed *Phragmites australis* could jeopardize integrity of the landfill cap and the Navy must better manage the maintenance of the cap. The Common Reed spreads by sending rhizomes deep below the soil surface, and rhizome depths of over two meters have been documented (see <http://www.mass.gov/dcr/>

waterSupply/lakepond/publications.htm#factsheets). Shoots are sent upward through the soil from these rhizomes, and the aggressive growth habit of this plant could damage the landfill cap, causing infiltration of water through the cap. The nearby presence of a robust source of wind-blown seed also threatens the success of the Area A Downstream wetland restoration. A variety of control methods are available for *Phragmites*, and these control technologies should be employed to control *Phragmites* in the Area A landfill, Area A Downstream, and the Area A Wetland.

**Response:**

Agree. The Navy intends to improve management of *Phragmites* at the Area A Landfill (Site 2) and Area A Downstream (Site 3) under the Operations and Maintenance (ECC) and Natural Resources (Environmental Department at NSB-NLON) programs. Control activities will be conducted annually under the Operations and Maintenance program, while activities will be conducted more frequently under the Natural Resources program as *Phragmites* growth issues are identified during routine inspections. The Navy, with the assistance of the regulators, will continue to evaluate the most effective ways to manage *Phragmites* growth.

The Navy agrees that the *Phragmites* in the Area A Wetland will continue to provide a source of seeds to the surrounding sites, but the *Phragmites* currently provide a natural vegetative cover over the dredge spoils in the wetland that prevents erosion and potential contaminant migration. Therefore, the Navy does not intend to control *Phragmites* growth in the Area A Wetland.

The following changes will be made to the text of the Five-Year Review to make it clear that *Phragmites* growth is an issue that needs to be addressed:

p. 2-20, Section 2.5.4, second bullet:

“Sediment, debris, and vegetation (*Phragmites*) clog portions of the drainage channels (i.e., A, B, C, and D). The affected portions of the channels are shown on Figure 2-1. If the sediment and debris are not removed, it may result in surface water overtopping the channels and flowing across the cap system. Continued *Phragmites* growth may result in the root system penetrating the cap because the roots can penetrate up to two meters.”

Table 2-5, Line 1:

“O&M of cap system [vegetation (*Phragmites*, trees, etc.), sediment, and asphalt cracks]”

**General Comment 3:**

A universal correction is required for the date of the Final Operation and Maintenance Plan. The report is dated January 2006 but erroneously listed throughout the report as June 2006.

**Response:**

Agree. It was anticipated that the Final O&M Manual would be updated and issued by June 2006; however, the revisions were not made in time and the manual was not issued in June 2006. All references to the Final O&M Manual will be changed to January 2006.

**SPECIFIC COMMENTS – July 31, 2006 Attachment A and EPA Rebuttals****Specific Comment 1: p. 1-8**

Please include EPA's Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (October 2002) in the list of the new guidance documents from EPA. Compliance with this draft guidance will not impact the conclusions of the original human health risk assessments because of the lack of exposure pathway and lack of high levels of volatile organic compounds at the site.

**Response:**

Agree with clarification. A reference to the guidance will be added to the second sentence in the second paragraph on p. 1-8. However, because the guidance is draft, its appropriateness for use at NSB-NLON under the IR Program will be evaluated by the Navy as additional risk evaluations are required. Connecticut's Remediation Standard Regulations Volatilization Criteria (March 2003) will also need to be considered and a reference to the new criteria will be added to the third paragraph on p. 1-8.

**EPA Rebuttal on September 25, 2006**

The 2002 Draft Vapor Intrusion Guidance has been used at other Superfund sites in New England such as Durham Meadows, Nyanza, & Raymark to make decisions. Many RODs have been written and finalized based on this draft guidance. There are a few national workgroups working on different issues of the draft guidance to finalize it and provide policy in the interim. The draft guidance cited by EPA is the only document as of now to evaluate the vapor intrusion pathway.

EPA made the comment to ensure that this pathway was not ignored and

included in the discussion and evaluation for the 5-year review. It's a routine practice to look at this pathway now at 5-year review at all sites. EPA assumed that using this draft guidance to qualitatively discuss this pathway will not result in any change of the risk conclusions because there is neither a complete pathway nor high levels of VOCs. However, it should be evaluated in the 5-year review as a change in guidance.

**Response to EPA Rebuttal**

Rebuttal noted. A reference to the guidance will be added.

**Additional EPA Rebuttal on October 18, 2006**

Please list the following new risk guidances and explain that these new standards will be used in future 5-year reviews and remedy selections:

- Guidelines for Carcinogen Risk Assessment, EPA/630/P-03/001F, March 2005
- Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-03/003F, March 2005

**Response to Additional EPA Rebuttal**

Rebuttal noted. References to the two additional guidance will be added as requested.

**Specific Comment 2: p. 2-6, §2.3.1**

Please correct the first sentence in the fourth bullet on the page to read "... promote runoff and prevent run-on."

**Response:**

Agree. The requested text change will be made.

**Specific Comment 3: p. 2-22, §2.6**

In the last sentence in the first paragraph of the second bullet, please correct the section reference from 2.5.3 to 2.5.4.

**Response:**

Agree. The requested section reference will be changed to 2.5.4.

**Specific Comment 4: p. 2-23, §2.4**

In the discussion in the second bullet regarding optimization, caution should be used in further reducing the frequency of monitoring since the majority of the analytes have already been eliminated and the number of monitoring locations has been significantly reduced. Any decision to further reduce the frequency should be supported with appropriate rationale and demonstrate that seasonal variations do not need to be considered.

**Response:**

Agree with qualification. The groundwater monitoring program at the Area A Landfill has been ongoing for the past 6 years. The Navy, in consultation with the EPA and CTDEP, has optimized the program based on the monitoring results, which have not shown any significant seasonal variations. The EPA and CTDEP will be consulted by the Navy about future recommendations for optimization.

**Specific Comment 5: p. 2-25, §2.6**

In the discussion in the fourth bullet regarding equipment storage, the Navy should also implement a permit program for storage to better control what and how material is stored at the Site. The program implemented should include periodic inspections by Base personnel with inspector sign-off to establish responsibility for conducting proper inspections. EPA is willing to consider other recommendations for how to cease the mismanagement of the Area A Landfill.

**Response:**

Agree with qualification. The Navy has improved equipment storage at the Area A Landfill by restricting access to the site. The Command Masters at Arms (CMAA) at NSB-NLON took over access control for the landfill 6 months ago. The gates to the landfill are now locked at all times except for when requests are made to the CMAA.

The Navy will continue to evaluate and improve equipment storage at the site. The Environmental Department at NSB-NLON will include new text in the forthcoming SOPA that addresses equipment storage at Area A Landfill. The EPA will be provided with an opportunity to review and provide input on additional text.

**EPA Rebuttal on October 5, 2006**

If there is a written procedure outlining the new Command Masters at Arms

(CMAA) control for Area A Landfill, please append it to the Five Year Review Report.

### **Response to EPA Rebuttal**

The new procedure will be included in the revised SOPA (ADMIN) New London Instruction 5090.18B. The Navy issued a draft version of the revised instruction for regulator review in mid-October 2006 and subsequent versions in November 2006. It is likely that the final version of the instruction will be available prior to issuing the final Second Five-Year Review Report. The EPA will be provided with a final version of the instruction when it is available.

### **Specific Comment 6: Table 2-3**

This table presents groundwater monitoring criteria and should therefore apparently be titled OU9 rather than OU1. Please correct as appropriate (*see also* the Table of Contents for this section).

#### **Response:**

Disagree. Table 2-3 summarizes the Action Specific ARARs for the soil OU (OU1). These were taken directly from the ROD. No changes are required.

#### **EPA Rebuttal During November 2, 2006 Technical Meeting and November 29, 2006 Conference Call:**

The comment should have referred to Table 2-4.

The Federal AWQCs should be removed from Table 2-4.

#### **Response to EPA's Rebuttals**

Agree. OU1 will be changed to OU9 in the title of Table 2-4. The Table of Contents will also be updated.

Based on discussions during the November 29, 2006 conference call, it was agreed that Connecticut WQs are applicable criteria for sites at Naval Submarine Base - New London, but not the federal AWQCs. Therefore, Federal AWQCs will be removed from Table 2-4. Footnote 2 will also be removed from the table and the remaining footnotes will be renumbered as appropriate.

### **Specific Comment 7: Table 2-4**

Please correct the values in the columns for federal AWQC using the values listed on

EPA's website: <http://www.epa.gov/waterscience/criteria/wqcriteria.html>. Any text revisions need to reflect the correct criteria in this table.

**Response:**

Disagree. The values provided in this table were taken directly from the Final O&M Manual issued by the Navy in January 2006. Changes will be made to the federal AWQCs the next time the O&M Manual is updated. For consistency, no changes will be made to the Second Five-Year Review.

**EPA Rebuttal on October 18, 2006**

EPA takes issue with the response to specific comment 7. The responsibility to update ARARs (in this case the federal AWQCs) is through the five-year review. Therefore any changes to federally-promulgated standards should be incorporated throughout this document. Identify in the "Recommendations and Required Actions" column of the ARARs tables that the O&M Manual will be updated to incorporate new AWQC values."

For all ARARs Tables in each chapter a column needs to be included for the ARARs status as either "Applicable" or "Relevant and Appropriate" for promulgated statutes or regulations or "To be Considered" for guidance.

**Response to EPA Rebuttal**

New federal AWQCs will be added to Table 2-4 for comparison purposes. The main purpose of this table was to present criteria that are currently being used.

Table 2-5 will be updated to include a recommendation to incorporate new federal AWQCs the next time the O&M Manual is updated.

The requested column will be added to Tables 2-1, 2-2, 2-3, 3-3, 3-4, 3-5, 3-6, 3-7, 4-1, 4-2, 4-3, 5-3, 5-4, 5-5, 6-1, 6-2, 6-3 which contain ARARs for Sites 2, 3, 6, 7, and 8, respectively.

**Additional Response to EPA Rebuttal**

See the response provided for Specific Comment 6. Federal AWQCs will be removed from Table 2-4.

A recommendation to incorporate new AWQCs will not be added to Table 2-5.

**Specific Comment 8: Table 2-5**

The lack of maintenance of monitoring wells, given the current condition of several wells

(open and unprotected), suggests that the current protectiveness of the remedy is in jeopardy because groundwater can be impacted by discharges into the unprotected wells. Please change N to Y for current protectiveness because of the current condition of several monitoring wells.

**Response:**

Agree. The “N” will be changed to “Y” for current protectiveness because of the current condition of several monitoring wells. Once the wells are either properly abandoned or improved, the protectiveness could be changed back to Y.

**Specific Comment 9: p. 2-25, §2.7**

Please add the following bullet:

“All badly damaged monitoring wells should be repaired or abandoned without delay so the current protectiveness of the remedy cannot be questioned. Based on the October 2005 inspection and the April 2006 five-year inspection, those wells include § 2LMW17D, 2LMW18D, 2LMW8D or 8S (to be verified), and 2LMW20D. For the record, note also that 4MW1S, which is a stick-up well, is leaning but based on information provided by the sampling contractor, the well is still functional.”

**Response:**

Agree with qualification. The third bullet on p. 2-25, §2.7 will be changed to the following:

“...appropriate. Develop and implement a well abandonment program to eliminate wells that are no longer required for the monitoring program. The wells that should be abandoned at Site 2 include 2LMW8S, 2LMW18S, 2LMW18D, 2LMW20D, and 2LMW34DS.”

The wells listed above were taken from the October 2005 inspection report and the April 2006 five-year review site inspection.

**Specific Comment 10: p. 4-9, §4.4**

In the second bullet, as stated in the first five-year review report, a minor depression does exist 50-60 feet southwest of Building 491. This depression was photo-documented by EPA during the October 2005 inspection. This depression is located along the line of the large crack that was repaired at this same location. Please edit the report accordingly.

In the third bullet, EPA photographs of 6MW11D taken October 2005 and April 2006 do

not show that the cold patch has been installed as stated in the text. There is no evidence of the cold patch in these photographs. The minor depression still exists. Please correct as appropriate.

**Response:**

Agree with qualification. The second bullet will be changed to the following:

“No documentation is available that indicates any action was taken to repair the area of settlement found during the first five-year review approximately 50 feet southwest of Building 491. The depression is located along the line of the large crack that was repaired at this same location.”

Disagree. The well was repaired and the depression was filled in July 2005 as part of the corrective actions for the deficiencies identified by ECC in the 2004 Inspection Report.

**EPA Rebuttal on October 5, 2006**

EPA agrees that the well was repaired and a concrete pad was constructed around the well. However, EPA's photographs of October 2005 and April 2006 indicate that a depression still exists adjacent to the pad such that water was ponding adjacent to and onto the new concrete pad. There is no evidence of a cold patch repair at the 6MW11D well location.

**Response to EPA Rebuttal**

A picture of the 6MW11D well location is provided in Appendix B of the Second Five-Year Review Report on p. B-14. This picture was taken on April 4, 2006 during the site inspection. From the picture there is no evidence of a depression or ponded water adjacent to the well. The Navy will continue to monitor depressions in the area of well 6MW11D and address any significant depression through the O&M program.

**Specific Comment 11: p. 4-14, §4.5.2.2**

Please correct the last paragraph that discusses the installation of the cold asphalt patch adjacent to 6MW11D (see comment for page 4-9).

**Response:**

Disagree. See the response provided for Specific Comment 10.

**Specific Comment 12: p. 4-17, §4.5.4**

Regarding the bullet at the top of the page: For the record, equipment and material adjacent to Building 491 was moved during a previous annual inspection of the Site and no evidence of well 6MW4S was found. This well has apparently been abandoned. The Navy should review the construction records to determine whether the abandonment was documented but overlooked.

Please add another bullet noting that well 6MW7S is located in a depression and water periodically covers the well. This well should be abandoned if it is no longer used in the monitoring program.

**Response:**

The Phase I RI, Phase II RI, and the Time-Critical Removal Action Report were reviewed. Monitoring well 6MW4S was sampled only once during the Phase I RI. The well falls outside the limits of the soil removal action, but inside the limits of the cap that was installed after the removal action was completed. It is likely that the well was abandoned during the removal action and cap installation but no records are available to document the abandonment. The Navy will consider the well as abandoned into the future.

A well abandonment program will be developed for NSB-NLON. Monitoring well 6MW7S will be added to the monitoring well list included in the program.

**Specific Comment 13: p. 4-19, §4.6**

Regarding the second last bullet, previous discussion of the future DRMO uses in this report indicated that a possible future use of the DRMO was as a parking lot for the Yacht Club. Please edit this bullet to address this.

**Response:**

Agree. The last sentence in the bullet will be changed to the following:

“The land use of the DRMO may change in the future to a parking lot for a Yacht Club. The change in site conditions should not effect exposure pathways (i.e., there are no new contaminants, sources, or direct routes of exposure).”

**Specific Comment 14: Table 4-2**

At several locations in this table the text states that the requirement is no longer applicable because the remedy has been constructed. However, if wells are to be abandoned, it may be premature to state that the requirements are no longer

applicable. Please review these statements and if appropriate, qualify them regarding the well abandonment activities.

**Response:**

Agree. The Current Status/Applicability column of Table 4-2 will be qualified regarding well abandonment activities.

**Additional Response:**

Tables 4-1, 4-2, and 4-3 will be updated to be consistent with the new ARARs tables provided in the final ROD for Site 6/OU2 (December 2006).

See the response provided for Specific Comment 6. Federal AWQCs will be removed from Table 4-5 and the text and table footnotes will be revised accordingly.

**Specific Comment 15: Table 4-6**

There is concern regarding the classification for future protectiveness as it relates to the monitoring wells. In their present condition the classification is acceptable. However, if the wells are not inspected annually and maintained in good condition, they could jeopardize the protectiveness of the remedy.

**Response:**

Agree with clarification. The future column for the third and fourth deficiencies in the table will be changed from N to Y. It should be noted that the Navy has an active O&M program and routinely maintains the monitoring wells.

**Specific Comment 16: Figure 4-1**

Please edit the figure to better describe the areas impacted by the ponding of water. The area along the jersey barriers actually extends north past Building 491 - it is over 200 feet long and between 3 and 10 feet wide. The water ponding on the southern boundary of the cap is actually north of well 6MW2S. Please edit this figure accordingly.

**Response:**

Agree. Figure 4-1 will be modified to more accurately depict the areas impacted by the ponding water.

**Specific Comment 17: p. 5-1, §5.0**

The title of this section should also include a reference to OU9 because groundwater at this Site is included in OU9.

**Response:**

Agree. The title will be changed to the following:

**“5.0 SITE 7 – TORPEDO SHOPS (OU8 AND OU9)”**

**Specific Comment 18: p. 5-14, §5.5.4**

At the top of the page, please clarify if these wells were installed before the May 2006 sampling event. If not, then ARARs related to well drilling activities are pertinent until the wells are installed (see Table 5-6).

**Response:**

Disagree. The monitoring wells included in the Site 7 groundwater monitoring program were installed in May 2006. These wells were sampled during the May 2006 Round 1 sampling event. No changes are required for Table 5-6.

**Specific Comment 19: Tables 5-6**

ARARs related to well installation are applicable if all the wells have not yet been installed (see comment above). Please clarify.

**Response:**

Disagree. See response to Specific Comment 18.

**Specific Comment 20: p. 6-20, §6.5.4**

In the second bullet, please note that the sprinkler system is required to maintain a healthy grass cover that will minimize the infiltration of precipitation and prevent desiccation of the soil. It should be fixed, maintained, and used.

Regarding the third bullet, the October 2005 inspection also noted that 8MW1S was missing one bolt (broken box) and 8MW4 was missing both bolts (broken box).

**Response:**

Agree. The Nautilus Museum was notified about the sprinkler system and it will be repaired.

Agree with clarification. The items noted in the comment for wells 8MW1S and 8MW4 were noted on the 2005 Inspection Checklist completed by ECC and provided in Appendix A of the Second Five-Year Review Report. The items will be added under Subsection 2005 on p. 6-19. These items were not identified during the site inspection conducted in April 2006 and will therefore not be added to Section 6.5.4 on p. 6-20.

**Specific Comment 21: Section 6.6**

Significant PCE contamination has been shown to migrate on site from an upgradient, off-base source and CTDEP is addressing the source area. Please expand the discussion regarding how and when this work will be conducted. Please also discuss whether there will be any evaluation of the contamination on site to determine risks caused by exposure to PCE at the site.

**Response:**

Agree with clarification. The Navy requested additional information from the CTDEP regarding the actions taken at the former dry cleaners, but they have not provided the information. An additional request will be made to the CTDEP.

The risks to museum employees associated with exposure to vapors in indoor air from the PCE in groundwater were evaluated by the Navy during the Phase II RI. Both quantitative and qualitative evaluations were completed during the RI. Three rounds of air samples were collected from inside of the museum and were used to complete the evaluations. The quantitative risk evaluation found that the noncarcinogenic risks were below and the carcinogenic risks were within EPA's target risk range. The qualitative assessment, which included comparisons of air concentrations to Time-Weighted Averages and Short-Term Exposure Limits, found that none of the air concentrations exceeded the criteria. Therefore, the RI concluded that the museum employees were not at increased risk due to the PCE present in the site groundwater. The Navy will consider additional risk evaluations, as appropriate, during the completion of the Feasibility Study and ROD for the groundwater at the Goss Cove Landfill.

**EPA Rebuttal on September 27, 2006**

During the September 26, 2006 conference call, the EPA requested additional time to provide acceptance of the response to Specific Comment 21 because of the need to have a risk assessment specialist review the response. EPA Region

l's risk assessor, Chau Vu, subsequently reviewed the response and indicated that the Navy's response was adequate in an e-mail on September 27, 2006 to the EPA Remedial Project Manager, Kymberlee Keckler.

**Additional Response**

The CTDEP provided a copy of a September 7, 2005 report, prepared by TRC, that summarized the results of the April and July 2005 Quarterly Groundwater Monitoring Events and Post-Remediation Soil Quality Evaluation at the former Fusconi Cleaners and Tailors, Inc. A summary of this report will be incorporated into the Second Five-Year Review.

**Specific Comment 22: p. 6-21, §6.5.4**

Please rewrite the second bullet to read:

"The hazardous material storage cabinets in the northern storage area are not kept locked. To prevent unauthorized use or accidents, they should be locked when not being used."

**Response:**

Agree. The second bullet will be changed to the suggested text.

**Specific Comment 23: p. 6-24, §6.8**

Please add a bullet that reads:

"Repair damaged road boxes found at wells 8MW1 and 8MW4 during the October 2005 inspection unless these wells will be abandoned soon."

Please add a bullet that reads:

"Extend well 8MW10S to the ground surface or install a replacement well."

**Response:**

Agree. The statement regarding wells 8MW1 and 8MW4 will be added to Section 6.8.

Agree. The statement regarding well 8MW10S will be added to Section 6.8.

**Specific Comment 24: Figure 6-2**

The round identification for well 8MW10S has been cut off. Please correct this figure.

**Response:**

Agree. The tag box will be shifted to the left so that the round identification will be visible.

**Specific Comment 25: Table 23**

Please edit the to incorporate the additional recommendations identified in these comments.

**Response:**

Agree with clarification. It was assumed that the comment was referring to Table 23-1. The following changes were made to the table:

- Milestone dates were added to the table.
- See Response to Specific Comment 27. The requested additional text will be included in Table 23-1 for Site 2 – Area A Landfill.

**Specific Comment 26: App. C.1, p. 2**

In item #4, the reason for not doing maintenance in the deployed parking area is not acceptable. This area was accessed by the annual inspection team in October 2005 and numerous significant issues impacting the cap were identified. Maintenance and repair of the deployed parking area cap needs to be a priority at Area A together with abandonment of open monitoring wells.

**Response:**

Agree. The Navy and its O&M contractor (ECC) will coordinate access to the Deployed Parking Area to improve maintenance in the area. As stated in Specific Comment 12, the Navy will develop and implement a well abandonment program in Fiscal Year 2007.

**Specific Comment 27: App. C.1, p. 3**

In item #4, the Navy should implement a storage permit and inspection program to control and manage storage at Area A.

Item #5 indicates there are no settlement records. Any landfill cap should be periodically monitored for settlement, so if no such program currently exists for Area A, it should be implemented as a recommendation of this five-year review. A benchmark monument elevation needs to be established and elevations of features on the landfill, such as vent pipes, need to be periodically shot to monitor settlement. Please incorporate this into the recommendations for Area A landfill.

**Response:**

Agree with clarification. Please see the response provided for Specific Comment 5.

Disagree. Settlement monuments are not standard features for landfill caps. Settlement monuments were not identified as a requirement by EPA during the design, time of construction, or development of the O&M program for the landfill cap. The Navy will continue to conduct annual visual surveys for significant settlement (differential, sink holes, etc.) during the O&M inspections. If the visual surveys identify significant settlement and repairs are required to the cap system, a licensed surveyor will complete surveying of the impacted areas.

**EPA Rebuttal on October 5, 2006**

The 5 year review process provides a legitimate forum for evaluating the post capping care of the landfill and can lead to revision of the O&M manual. Please refer to OSWER document 9355.3-18FS, EPA/540/F-95/009, PB95-963412, August 1995 entitled "Presumptive Remedies: CERCLA Landfill Caps RI/FS Data Collection Guide" for a discussion of the importance of settlement monitoring for landfill caps. Although settlement monuments may not have been included in the original design, settlement monitoring is an important element of landfill maintenance. EPA recommends that a baseline survey be conducted for reference in assessing future settlement at the landfill. This measure will be protective of the cap liner as settlement could potentially damage the liner and compromise the cap. Because this landfill is located adjacent to wetlands, it is particularly susceptible to settlement problems. In the short term, please revise Table 23-1. Add the following recommendation to the "O&M of cap system" column: "evaluate settlement monitoring to supplement visual surveys."

**Response to EPA Rebuttal**

The Navy reviewed the referenced guidance (EPA/540/F-95/009) and reviewed site information for the three landfills (Area A, DRMO, and Goss Cove) that exist at NSB-NLON, Groton, Connecticut. Of the three landfills, the Area A Landfill is the only landfill with potential settlement and slope stability issues because of the dredge spoil material that underlies the waste and cap. A post-construction topographical survey was conducted after the cap was installed at this site and it is available for comparison if additional settlement monitoring is required in the

future. The requested additional text will only be included in Table 23-1 for Site 2 – Area A Landfill.

The following text summarizes available information regarding settlement and slope stability for the Area A Landfill at NSB-NLON:

Settlement - The guidance referenced by the EPA refers to the RI/FS stage of data collection to identify data pertinent to landfill cap design, including information to calculate settlement. It does not specifically state that settlement surveys are a requirement for landfills during post construction monitoring.

Information was gathered for Area A Landfill during the RI/FS stage and used during the design stage to evaluate settlement. It was determined at that time that settlement would be minimal and damage was not expected. In addition, because the dredge spoil thickness is thought to increase gradually across the landfill from south to north, localized settlement is not expected.

Settlement analysis of the Area A Landfill was performed by Atlantic Environmental Services, Inc. (Atlantic) and presented in Design Analysis: Basis of Design and Calculations, Area A Landfill Cap (June 1994). ASTM laboratory consolidation tests were performed on two undisturbed samples of dredge spoil. Using laboratory test results and the calculated load of the new cap, the calculated maximum settlement was 1.5 inches in 15 years, with a differential settlement of 0.84 inches.

Settlement was further evaluated by Brown & Root Environmental (B&RE) in the Revised Design Analysis Report for Area "A" Landfill (December 1996). This detailed settlement analysis evaluated elastic settlement of the landfill material before and after placement of the cap, and long-term consolidation of the dredge spoil material as a result of placement of structural fill, the final cover system, and lowering of the groundwater table. For a conservative analysis, the groundwater elevation was assumed to drop to the elevation of standing water in the wetland. The settlement analysis determined an increase in slope from 3.3% before cap construction to 3.5% after construction.

A study of the cross sections included in the Revised Design Analysis Report (B&RE, 1995) indicates that the dredge spoil thickness increases gradually beneath the landfill, with the thickest layer of spoil along the wetland (north). The surface slope of the landfill is graded to drain towards the wetland; therefore, the differential settlement of the dredge spoil layer, although minimal, will improve surface drainage.

Slope Stability - The EPA also mentioned slope stability issues at Area A Landfill (i.e., slope stability of the western edge of the Area A Landfill) as justification for settlement surveys during a conference call on September 26, 2006. The western edge of the landfill is a dike that was constructed by the Navy to retain

dredge spoils from the Thames River. The Area A Landfill design reports were reviewed to determine whether slope stability had been addressed.

Slope stability analyses were presented in Section 5 and Appendix F of the Groundwater/Leachate Modeling Study Report for Area A Landfill Remedial Design (B&RE, October 1996) and in Section 3 and Appendix C of the Revised Design Analysis Report for Area "A" Landfill, (B&RE, December 1996). Dredge spoil strengths were based on triaxial tests and blow counts. Literature values were used for other soil and aggregate strength values and geosynthetic interface shear values.

Subsurface conditions were based on numerous boring logs, and several cross-sections were drawn to determine the critical section. Analyses were performed for short-term (total stress) and long-term (effective stress) conditions at both the critical section and the crane test pad area. Flood conditions were also evaluated for the critical section, and both finite and infinite analyses were performed on the proposed cap.

The Groundwater/Leachate Modeling Study Report includes drawings of seven cross sections which were considered for analysis. All seven cross sections were along the northern wetland face of the landfill. It was assessed early on that the western end of the landfill (dike) was not the critical section, and was not considered further. The cap as it was constructed includes a toe buttress constructed of gabion baskets below the riprap that is on the sideslope. The toe buttress was added to the cap design to eliminate small surficial sloughs in areas with low safety factors identified in the analysis of the wetland-side toe of the landfill.

Drawings included in the Groundwater/Leachate Modeling Study Report were also reviewed to determine information regarding the dike along the western boundary of the landfill. The review showed that at the upper surface of dredge spoil, the dike is 55 feet wide. The dike was first constructed and dredge spoil was placed behind the dike in both the wetland and (future) landfill areas. Later, material was landfilled along southern edge of the spoil, creating the Area A Landfill. The dike slopes are 2H:1V downstream and 1.5H:1V upstream, with a narrow crest. The construction procedures of the dike are unknown.

In summary, the stability of the northern slope (wetland side) of Area A Landfill was analyzed for several stress conditions and found to be acceptable; however, the western slope of Area A Landfill was not thoroughly analyzed.

#### **Additional EPA Rebuttal on October 18, 2006**

With regard to specific comment 27 (Appendix C.1, page 3), EPA accepts the Navy's agreement to modify Table 23-1 for the Area A Landfill. We understand that the table will recommend evaluation of settlement at the Area A landfill via a

survey that will compare the updated survey elevations with elevations collected for the post-construction survey of the landfill. No resolution was offered regarding the timing for the updated survey or what criteria would be used to determine when it would be done. EPA expects that local settlement issues will continue to be evaluated as required by the O&M Manual and, based on the analyses offered in the response, requests that a comprehensive topographic survey be completed, for comparison to the post-construction survey, before the next five-year review. That would approximately correspond with the timeline evaluated by Atlantic (15 years) to provide a check on the accuracy of the settlement predictions.

### **Response to Additional EPA Rebuttal**

The Navy will consider completing a topographic survey of the Area A Landfill surface prior to completing the Third Five-Year Review for NSB-NLON. The results of the survey would be compared to the post-construction survey completed in 1997 by SAI Surveying Company to determine any potential areas of significant settlement.

### **Specific Comment 28: App. C.1, p. 5**

Regarding item #C1, guidance already exists in the SOPA regarding surface disruption, subsurface excavation, and dewatering work. However, EPA would welcome stronger and more specific language. The Navy needs to create a permit program for storage control to the SOPA, with inspections to enforce the program. Please edit the text accordingly.

### **Response:**

Agree with clarification. Please see the response provided to Specific Comment 5 for additional storage control information at the Area A Landfill.

The NSB-NLON Environmental Department is in the process of updating the SOPA and the EPA's comments will be considered during its update. It is anticipated that a draft version of the SOPA will be available in mid-October 2006 for review and comment and that it will be finalized in November 2006.

No change is required to the Five-Year Review Site Inspection Checklist provided in Appendix C.1.

### **Additional Response:**

See response to Specific Comment 5 regarding the update of the SOPA.

**Specific Comment 29: App. C.1, p. 6**

Regarding item #2, the deployed parking area gate is locked as it should be. However, the Navy needs to be proactive in getting access to make the necessary repairs. The inspection team got access in October 2005 to conduct the annual inspection and found several significant problems.

Regarding item #4, holes may not fully penetrate the asphalt but there are several cracks that fully penetrate the asphalt. Please note this in the text.

Regarding item #7, this form indicates no bulges. However, the text describing the annual inspections indicates that bulges have been identified. Please correct this form accordingly.

**Response:**

Agree. See response to Specific Comment 6. Maintenance of the Deployed Parking Area will be improved.

Agree. The third bullet on p. 2-21 will be changed to the following:

“Longitudinal cracks continue to form in the asphalt. Several of the cracks fully penetrate the asphalt. Many of the cracks haven been sealed, but if the new cracks are not sealed, ....”

Agree. As noted on p. 2-19 under the 2005 Inspection Report, bulges have been identified in the asphalt surface in the Deployed Parking Area. Item 7 will be changed to indicate bulges are evident in this area.

**Specific Comment 30: App. C.1, p. 8**

Regarding item #12, EPA observed at the annual inspections that the phragmites have grown through the asphalt pavement in several areas. Please divulge the severity of this problem by editing the text with this information.

**Response:**

Agree. Item 2 will be changed to indicate that phragmites growth is significant in some of the channels and it penetrates the asphalt in several places.

**Specific Comment 31: App. C.1, p. 8**

Regarding item #J, several other wells are severely damaged and need to be abandoned. Please refer to earlier comments and edit this form accordingly.

**Response:**

Agree. According to the response to Specific Comment 9, monitoring wells 2LMW8S, 2LMW18S, 2LMW18D, 2LMW20D, and 2LMW34DS are damaged and should be abandoned. This information will be incorporated into Item J.

**Specific Comment 32: App. C.1, p. 9**

Regarding item #B, the description provided is not adequate. The Navy has fallen behind in its responsibility to maintain the cap and needs to make a more concerted effort to catch up. Once that point has been reached, then more routine maintenance can be performed to avoid falling behind again.

Regarding item #C, without the asphalt cap the landfill does not meet EPA guidance that recommends long-term minimization of infiltration. Also as more infiltration reaches the liner, more infiltration will also pass through the liner to the waste material and increase the potential for leaching. Infiltration also increases the potential for frost damage to the asphalt as well as to the cap layers beneath the asphalt and infiltration can cause erosion and washout that creates voids and associated settlement issues. Please delete the dismissive language used regarding the asphalt layer. Further regarding item #C, the issue with vegetation in the channels is not just sedimentation and the vegetation itself, which are problematic if they cause precipitation to run onto the cap, but damage to the asphalt in the channels by phragmites growing through the asphalt and rooting beneath it. Please edit the text to reflect these issues and provide a more balanced discussion of the facts.

**Response:**

Agree. The text in Item B will be changed to the following:

“Limited O&M has been completed at the site since the cap was constructed. Cracks in the pavement have been sealed and sediment and vegetation have been removed from the channels, culverts, and riprap; however, these are recurring problems and the frequency of O&M must increase. In addition, some identified deficiencies have not been corrected by the O&M program. Some monitoring wells...”

Disagree with clarification. The Navy and EPA have previously discussed the asphalt issue at the Area A Landfill during development of the O&M Manual. The drainage layer, GCL, and 40 mil LDPE provide the infiltration barrier for the landfill cap and not the asphalt. It is important that the Navy maintain the asphalt over the cap to allow vehicles and equipment to be moved around without damaging any of the underlying cap components. It should also be noted that the drainage channels on the southern side of the cap (Channels A and B)

where vegetation are a concern are underlaid by clay and not the typical cap components and waste. Based on this information, the Navy recommends the following changes to the text in Item C:

“...results in damage to the asphalt requiring repair. The asphalt surface should continue to be maintained to allow vehicles and equipment to be moved around without damaging any of the underlying cap components. Phragmites growth in the drainage channels should be managed aggressively since these invasive plants have significant root structures that could damage underlying material and their presence in the channels causes impediments to flow. Overall O&M of the cap system needs to be improved.”

**Specific Comment 33: App. C.2, p. 3**

Item #6, indicates there are no settlement records. Any landfill cap should be periodically monitored for settlement, so if no such program currently exists for the DRMO, it should be implemented going forward as a recommendation of this five-year review. A benchmark monument elevation needs to be established and elevations of features on the landfill, such as monitoring well, need to be periodically shot to monitor settlement. Please incorporate this into the recommendations for the DRMO landfill.

**Response:**

Disagree. See response to Specific Comment 27.

**Specific Comment 34: App. C.2, p. 7**

Item #D should be checked as applicable.

**Response:**

Agree. A check will be placed in the applicable box under Item D.

**Specific Comment 35: App. C.3, p. 3**

Item #6, indicates there are no settlement records. Any landfill cap should be periodically monitored for settlement, so if no such program currently exists for the Goss Cove landfill, it should be implemented going forward as a recommendation of this five-year review. Also, differential settlement was a concern during the design of the landfill cap especially differential settlement between the culvert and the catch basin drains. A benchmark monument elevation needs to be established and elevations of features on the landfill, such as monitoring wells and catch basins, need to be

periodically shot to monitor settlement. Please incorporate this into the recommendations for the Goss Cove landfill.

**Response:**

Disagree. See response to Specific Comment 27.

**Specific Comment 36: App. C.3, p. 5**

Regarding item #C1, guidance already exists in the SOPA regarding surface disruption, subsurface excavation, and dewatering work. EPA would welcome stronger and more specific language.

**Response:**

Please see responses provided for Specific Comments 5 and 28.

**Specific Comment 37: App. C.3, p. 7**

Regarding item #D3, there are other wells missing bolts because their road box is damaged, including wells 8MW1, 8MW5S, and 8MW4. These should be identified here.

**Response:**

Agree. The second sentence will be changed to the following:

“...internally. 8MW1, 8MW4, and 8MW5S are missing bolts. 8MW10S buried...”

**Specific Comment 38: App. C.3, p. 8**

Regarding item #I2, the sprinkler system is required to maintain a healthy grass cover to minimize infiltration and to prevent desiccation of the soil. The sprinkler system should be repaired and used. If the system is used while broken, then it could soak certain areas and cause infiltration through the soil cover.

**Response:**

Agree. Please see response to Specific Comment 20. The text will be changed to the following:

“Sprinkler system is exposed and damaged. Use of sprinkler system while it is

damaged would add significant infiltration into the asphalt/grass cover. The Nautilus Museum was notified about the problem and it has been or will be corrected. Use of the sprinkler system will maintain a healthy grass cover.”

**Specific Comment 39: App. C.3, p. 8**

Regarding item #J, other wells also need maintenance including wells 8MW1, 8MW5S, and 8MW4. These should also be identified here.

**Response:**

Agree. The sentence provided under the remarks section in Item J will be changed to the following:

“Monitoring wells 8MW1, 8MW4, 8MW5S, 8MW9S, and 8MW10S required maintenance.”

**ADDITIONAL COMMENTS – AUGUST 8, 2006 E-MAIL**

**Additional Comment 1:**

Summary Form, Review Status section of the form – can you explain the purpose of the “highlight” and “Policy Type (name)” boxes? Please reference the 2001 5-yr review guidance, page E-17 for the contents of the “Type of Review” box and what should be in it.

**Response:**

Agree with clarification. The template for the summary form in the Second Five-Year Review was the summary form included in the First Five-Year Review. The First Five-Year Review was prepared when EPA’s guidance was in draft form. The form in the Second Five-Year Review will be updated to match p. E-17 of EPA’s guidance. The Navy requests input from the EPA on which one of the six review types should be selected. The Navy believes the category should be “NPL – Statutory” but this category is not listed.

**EPA Input during September 26, 2006 Conference Call**

The review type should be “Post SARA.”

**Response to Input**

The “Post SARA” category will be identified in the form.

**Additional Comment 2:**

All issues identified in the first 5-yr review that weren't resolved and carried over to the second review should have milestone dates to indicate when the issue will be completed/resolved in the recommendation section.

**Response:**

Agree. Milestone dates (fiscal year and quarter) will be added to Table 23-1; however, these dates should be considered tentative goals because funding and contractual constraints may limit the Navy's ability to meet some of the dates.

**Additional Comment 3:**

Additionally, any new issues identified in the second review should include milestone dates in the recommendation section for when they'll be resolved. Typically, the milestone dates for correcting the issue(s) (carried over and new) is before the completion of the next 5-year review.

**Response:**

Agree. Please see response for Additional Comment 2.

**Additional Comment 4:**

Most of the sites evaluated indicate whether interviews were conducted. Since some don't, for consistency you should indicate if interviews were conducted as part of the site evaluation and if they weren't why not.

**Response:**

Informal interviews were conducted as part of the site inspection process for those sites with active issues. Interviews were not conducted for Sites 9, 15, 16, 18, and 23. Subsections will be added to Sections 7, 12, 13, 15, 20 to indicate that informal interviews were not conducted for these 5 sites because there were no active issues to discuss.

**Additional Comment 5:**

Please reference the 2001 5yr review guidance – In the draft there are a number of sites (e.g., Site 22 – Lower Subbase – Pier 33 (OU4)) where a remedial action has not

taken place. For those sites that do not have a ROD (remedial action) we typically say that protectiveness can not be determined.

**Response:**

Agree. A deferred protectiveness statement will be added for those sites where a remedial action has not taken place and a No Further Action ROD is not already in place (i.e., Sites 10, 11, 13, 17, 19, 21, 22, 24, and 25).

**Additional Comment 6:**

Also, unless the site is construction complete we typically do not require a site-wide protectiveness statement.

**Response:**

Additional clarification is required from EPA. The EPA's comment is not specific regarding a particular section; however, it is assumed that the comment is referring to Section 23. The site-wide protectiveness statement was provided to summarize the issues at all of the sites at NSB-NLON. The Navy believed this statement was useful because of the large number of sites included in the review. A similar statement was provided in the First Five-Year Review. Further discussion is required with the EPA on this issue.

**EPA Input during September 26, 2006 Conference Call**

EPA Region I accepts the response.

**Response to Input**

The site-wide protectiveness statement will remain in Section 23.

**ADDITIONAL COMMENTS – OCTOBER 18, 2006 E-MAIL**

**Additional Comment 1: p. v**

Recommendations and Required Actions: For each paragraph that discusses institutional controls add: "Continued enforcement of the New London Instruction #5090.B and at least yearly monitoring of Institutional Control compliance with the monitoring reports incorporated into future 5-year reviews."

**Response:**

Agree. The requested text, with the following changes, will be added to paragraphs regarding Sites 2, 3, 6, 7, and 8.

“...Instruction #5090.B and performance of Institutional Control compliance monitoring at least yearly with the...”

**Additional Response:**

The reference for the instruction will be changed to #5090.18C. This reference is for the new instruction issued in December 2006.

**Additional Comment 2: p. 1-7, ¶2**

Has the notice of the Second Five-Year Review report and the draft been provided to the community? If so, please update this paragraph.

**Response:**

A public notice for the Second Five-Year Review has not been issued to the public yet. It is anticipated that the notice will be issued once the draft final version of the Second Five-Year Review report is issued in December 2006 and placed in the Public Repositories. The text will be changed in the final version of the report to document the date when the notice was issued.

**Additional Comment 3: p. 1-8, ¶2**

Please mention that the 2005 EPA risk guidances will be used in future 5-year reviews.

**Response:**

Agree. The paragraph will be edited to say: “...Since the human health risk assessments were prepared USEPA has issued new guidance documents (USEPA, 2001b; 2002a; 2002b; 2004a; 2004b; 2005b; and 2005c). The new guidance documents do not impact the conclusions of the original human health risk assessments. Future HHRAs and 5-year reviews will consider the most recent USEPA guidance.”

In addition, the following will be added to the reference list:

USEPA, 2005b. Guidelines for Carcinogenic Risk Assessments. Risk Assessment Forum, EPA/630/P-03/001F, Washington, DC, March.

USEPA, 2005c. Supplement Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens. Risk Assessment Forum, EPA/630/R-03/003F, Washington, DC, March.

**Additional Comment 4: p. 1-9, ¶3**

Discuss the change in the arsenic MCL level and the manganese risk level.

**Response:**

The following sentence will be added to p. 1-9, ¶3:

“However, the MCL for arsenic changed from 50 µg/L to 10 µg/L in January 2000 and EPA Region I issued new guidance for evaluating risks associated with manganese in November 1996. USEPA revised the oral reference dose for manganese in the IRIS database in May 1995. In November 1996 USEPA Region I issued guidance for evaluating exposures to manganese in soil and groundwater using the revised IRIS oral reference dose. The USEPA Region I guidance for manganese has been used in all human health risk assessments prepared for NSB-NLON since November 1996. “

**Additional Comment 5: p. 2-19, §2.5.3**

Change the fourth sentence as follows: ~~"the ARARs were either addressed during construction or selection of the remedy and are no longer applicable, or have not been amended...."~~ All of the "construction-related" ARARs are still applicable to required O&M of the remedy and should be retained. This change needs to be made to the "ARAR and Site-Specific Action Level Changes" in each chapter and to the ARARs Tables in each chapter.

**Response:**

Agree. The suggested text change will be made to the "ARAR and Site-Specific Action Level Changes" subsection in each applicable chapter and to the ARARs tables in each applicable chapter.

**Additional Comment 6: p. 2-22**

Should the last sentence under the second bullet refer to Section 2.5.2?

**Response:**

Agree with clarification. This issue was previously raised by the EPA in Specific

Comment 3. The last sentence under the second bullet should refer to Section 2.5.4. This change will be made.

**Additional Comment 7: p. 2-24, first -**

If these contaminants are present in the landfill they should continue to be monitored to ensure that they are not released owing to remedy failure (although they may need to be sampled less often).

**Response:**

Disagree. The Navy, EPA, and CTDEP agreed to the changes to the monitoring program listed on page 2-24 of the Five-Year Review Report. These recommendations were provided in the Year 2 Groundwater Monitoring Report and implemented during Round 11 (September 2002). The changes were made based on the results of the monitoring program that showed these contaminants were not present in groundwater at concentrations in excess of the criteria.

The text will be changed to read:

“Pesticides and PCBs were eliminated from the monitoring program in the new plan because these contaminants were not detected during the first 10 rounds of monitoring. VOCs were eliminated from the monitoring program because the monitoring data showed that these contaminants were not detected or not present at significant concentrations. “

**Additional Comment 8: p. 2-24**

Add another dashed item explaining the changes to the arsenic MCL and manganese risk level.

**Response:**

Disagree. The Groundwater Monitoring Plan for Area A Landfill considered background concentrations, CTDEP SWPCs, federal AWQCs, and CTDEP WQCs to select monitoring criterion for arsenic. The MCLs are not being used as monitoring criteria. Manganese is not being monitoring for groundwater or surface water at this site. No changes will be made in response to this comment.

**Additional Comment 9: p. 2-25, §2.7**

Add two new bullets "At least yearly monitoring of Institutional Control compliance with the monitoring reports incorporated into future 5-year reviews" and "Amend O&M

Manual with new AWQC values." Make this change to every Chapter where there is either ICs or where AWQCs are used for monitoring.

**Response:**

Agree. These two bullets will be added to the Recommendations and Follow-Up Actions sections in Chapters 2, 3, 4, 5, and 6 for Sites 2, 3, 6, 7, and 8, respectively.

**Additional Response:**

See the response provided for Specific Comment 6. Federal AWQCs will be removed as criteria and the O&M Manual does not need to be amended to include the new AWQCs. However, the O&M Manual does need to be amended to remove the AWQCs as criteria. An appropriate note will be added.

**Additional Comment 10: Table 2-1**

CT Water Pollution Control, Current Status: Change the last sentence to: ~~"this requirement is no longer applicable~~ these requirements are applicable to future operation and maintenance of the remedy." Make this change to every Chemical-specific ARAR Table for each chapter that cites these standards.

**Response:**

Agree. This change will be made to Table 2-1. This is the only chemical-specific ARAR table that cites this regulation. The regulation is presented in action-specific ARAR tables for other sites.

**Additional Comment 11: Table 2-1**

CT Water Quality Standards: Move to the Action-specific Table since these standards are currently used for monitoring, not cleanup. Make this change to every Chemical-specific ARAR Table for each chapter that cites these standards.

**Response:**

Disagree. The ARAR tables presented in the Second Five-Year Review Report are the ARARs tables from the RODs for each site or OU. The Navy will make editorial changes to the tables, but not changes to the ARARs. The Navy's decision is based on the National Contingency Plan and EPA Five-Year Review Guidance which states that remedy selection decisions contained in RODs will not be reopened unless a new or modified requirement call into question the protectiveness of the selected remedy. The Five-Year Review Guidance further

states: "Therefore, although ARARs generally are "frozen" at the time of ROD signature, in conducting a five-year review, you should determine the effect of a newly promulgated or modified standard..."

**EPA October 30, 2006 Rebuttal:**

ARARs tables can be edited during the 5-year review process to address inconsistencies between RODs at a site (see EPA comments on the Brunswick NAS 5-year review). In this case the comment is not changing the ROD requirement but merely moving the citation for the standard from the chemical-specific to action-specific table. This is consistent with other Navy groundwater monitoring remedies.

**Response to EPA Rebuttal:**

ARARs tables were discussed during the November 29, 2006 conference call. The Navy and EPA agreed during the call that the Site 6 ARAR tables would be updated to be consistent with the final ROD and that the Sites 2 and 8 ARAR tables would remain unchanged, with the exception of minor editorial changes, in the Second Five-Year Review.

**Additional Comment 12: Table 2-2**

For every Location-specific Standard change the last sentence in the Current Status to:  ~~, this requirement is no longer applicable~~ these requirements are applicable to future operation and maintenance of the remedy." Make this change to every Location-specific ARAR Table for each chapter that cites these standards.

**Response:**

Agree. This change will be made.

**Additional Comment 13: Table 2-3**

For every Action-specific Standard where used the statement is used in "Current Status" (including RCRA and CWA) change to:  ~~, this requirement is no longer applicable~~ these requirements are applicable to future operation and maintenance of the remedy." Make this change to every Action-specific ARAR Table for each chapter that cites these standards.

**Response:**

Agree. This change will be made.

**Additional Comment 14: Table 2-3**

Regarding Federal and State air ARARs, even though the remedy used passive gas management, would these standards still be applicable for O&M of the remedy? If so change the "Current Status" text to reflect this in every Action-specific ARAR Table of each chapter where they are cited.

**Response:**

Federal and State air monitoring emissions levels are no longer applicable because it was agreed by EPA and CTDEP in the Area A Landfill ROD and O&M Manual that the passive gas vents would not be sampled. No change will be made.

**Additional Comment 15: p. 3-11, ¶2**

There should be an ESD to add the capping component to the remedy. Currently, there are no ICs or ARARs that address capping waste in place.

**Response:**

Agree. The Navy will contact the EPA to discuss the development of an Explanation of Significant Difference (ESD) for Site 3. Table 3-8 will be added and the Site 3 ESD will be identified as a deficiency.

**Additional Comment 16: p. 3-19, §3.5.1**

There is no discussion of ARARs that address the capped wastes left at Stream 4. There is also no discussion of Institutional Controls needed for the capped wastes left at Stream 4.

**Response:**

Agree. See Response to Additional Comment 15. Additional ARARs tables will be developed as part of preparation of the ESD. They will be added to the Third Five-Year Review Report.

New London Instruction 5090.18B is currently being updated and it will include a discussion of land use controls for waste left at Stream 4. The final version of the instruction will not be available prior to issuing the final Second Five-Year Review Report. Therefore, this issue will be identified as a deficiency in Table 3-8.

**Additional Response:**

The Navy is currently completing Instruction 5090.18.C. It is expected that the instruction will be finalized prior to issuing the final Second Five-Year Review Report.

**Additional Comment 17: p. 3-19, §3.5.3.2**

Discuss changes to the arsenic MCL and manganese risk level.

**Response:**

Disagree. Arsenic is not a groundwater COC for this site, and manganese is not a COC for any media at the site. Therefore, the changes are not applicable to this site. No changes will be made in response to this comment.

**Additional Comment 18: p. 3-19, §3.5.3.2**

Add a new fourth sentence: "At least yearly monitoring of Institutional Control compliance with the monitoring reports incorporated into future 5-year reviews."

**Response:**

Agree. The change will be made.

**Additional Comment 19: p. 3-20, bullet 2**

O&M will also be required for the capped waste left at Stream 4.

**Response:**

Agree. The following paragraph will be added:

"No O&M of the encapsulated soil at Stream 4 has been done to date. O&M activities need to be initiated at the site and continued into the future."

**Additional Comment 20: p. 3-21, bullet 1**

The capped waste left at Stream 4 is included in the New London Instruction.

**Response:**

Agree. See Response to Specific Comment 16. The following sentence will be added:

“...5090.18B. A small amount of contaminated soil was encapsulated at Stream 4 within Site 3. Controls on this area will be added to the instruction. Some areas of Site 3...

**Additional Response:**

All references to 5090.18B in the draft Second Five-Year Review Report will be changed to 5090.18C, the latest version of the SOPA.

**Additional Comment 21: p. 3-21, bullet 4**

Discuss the changes to the arsenic MCL and manganese risk level.

**Response:**

Disagree. See Response to Specific Comment 17.

**Additional Comment 22: p. 3-21, bullet 5**

Discuss incorporation of new EPA Cancer Risk Guidances into future 5-year reviews.

**Response:**

See response to Additional Comment 3. The purpose of the assessment on page 3-21 is to address the protectiveness of the remedy. This bullet will be changed to read:

- **“Changes in Risk Assessment Methods:** Since the human health risk assessments were prepared USEPA has issued new guidance documents, as discussed in Section 1.4. The new guidance documents do not impact the conclusions of the original human health risk assessments. As discussed in Section 1.4, ecological risk assessment methodology has not changed significantly over the past 5 years.”

**Additional Comment 23: p. 3-24, §3.8**

Add two new bullets "At least yearly monitoring of Institutional Control compliance with the monitoring reports incorporated into future 5-year reviews" and "Issue an ESD that

addresses the CERCLA requirements for the capped wastes at Stream 4."

**Response:**

Agree. See Response to Additional Comment 15. The requested bullets will be added to Section 3.8.

**Additional Comment 24: Chapter 3**

Previous comments for the Chapter 2 Tables apply to these ARARs tables.

**Response:**

Agree with qualification. See Responses to Comments on Chapter 2 ARAR tables.

**Additional Response:**

Disagree with qualification. See the response to Additional Comment 11.

**Additional Comment 25: Table 3-4**

Since wastes were capped in place and will require long term O&M all of the Location-specific ARARs are still applicable. Remove the text from the "Current Status" column which states that standards are no longer applicable.

**Response:**

Agree. The following sentence will be added to the table:

"Because waste was capped in place at Stream 4, these requirements are applicable to the future operation and maintenance of the remedy."

**Additional Comment 26: Table 3-5**

The ROD ARARs Tables include no mention of capping. Capping ARARs will need to be added through an ESD.

**Response:**

Agree. See Response to Specific Comment 16.

**Additional Comment 27: Table 3-5**

Since wastes were capped in place, remove the last sentence in the "Current Status" that says that standards are no longer applicable.

**Response:**

Agree. The following sentence will be added to the table:

"Because waste was capped in place at Stream 4, these requirements are applicable to the future operation and maintenance of the remedy."

**Additional Comment 28: Table 3-5**

Connecticut Hazardous Waste Management: Capping of wastes needs to be addressed in an ESD. Since wastes are left in place, the regulations are likely still applicable.

**Response:**

Agree. See Response to Additional Comment 16.

**Additional Comment 29: Table 3-5**

Since wastes were capped in place and require O&M, all of the Action-specific ARARs are still applicable.

**Response:**

Agree. See Response to Additional Comment 27.

**Additional Comment 30: Table 3-7**

Connecticut Hazardous Waste Standards: These standards are still applicable since new wells could be installed as part of O&M.

**Response:**

Agree. The following sentence will be added: "This requirement is applicable during future well installation activities."

**Additional Comment 31: p. 4-20, §4.8**

Add two new bullets "At least yearly monitoring of Institutional Control compliance with the monitoring reports incorporated into future 5-year reviews" and "Amend O&M Manual with new AWQC values." Make this change to every Chapter where there is either ICs or where AWQCs are used for monitoring.

**Response:**

Agree. This change will be made in Chapters 2, 4 and 6.

**Additional Response:**

The Navy and EPA discussed this comment during the November 29, 2006 conference call. It was agreed that the AWQC bullets would not be added to Chapters 2, 4, or 6.

**Additional Comment 32: Table 4-1**

Cite the same Chemical-specific ARARs and TBCs as in Chapters 2 and 6.

**Response:**

Disagree. Table 4-1 ARARs and TBCs were taken from the DRMO Interim ROD. No change will be made.

**EPA October 30, 2006 Rebuttal:**

Note that this change will be made to the final ROD to make this site consistent with the other cap remedies at the base.

**Response to EPA Rebuttal:**

The Navy and EPA discussed this comment during the November 29, 2006 conference call. It was agreed that the ARARs tables from the final Site 6/OU2 ROD would be incorporated into the Second Five-Year Review and that no changes, with the exception of minor editorial changes, are required to the ARARs tables for Sites 2 and 8 in Sections 2 or 6.

**Additional Comment 33: Table 4-2**

Since wastes were capped in place, long-term O&M all of the Location-specific ARARs is still applicable. Remove the text from the "Current Status" column that states that standards are no longer applicable.

**Response:**

Agree. This change will be made. In addition, the following sentence will be added: "This regulation was addressed during cap construction and well installation. The requirement is applicable to future operations and maintenance of the remedy."

**Additional Comment 34: Table 4-3**

Since wastes were capped in place and require O&M, all of the Action-specific ARARs are still applicable.

**Response:**

Agree. See the Response to Additional Comment 33.

**Additional Comment 35: pp. 5-7 & 5-8**

All of the bullets describing the remedial action should be modified to reflect that these actions have been taken.

**Response:**

Disagree. Subsection 5.3.1 discusses remedy selection. The actions listed are in the future tense to present the selected remedy for soil. Subsection 5.3.2 on p.5-10 discusses remedy implementation. As stated on page 5-10, documentation for the soil remedial action is currently being prepared and was not available at the time this report was prepared. No change will be made.

**Additional Comment 36: p. 5-16, §5.8**

Add the following new bullet: "At least yearly monitoring of Institutional Control compliance with the monitoring reports incorporated into future 5-year reviews."

**Response:**

Agree. This change will be made.

**Additional Comment 37: Table 5-6**

Connecticut Hazardous Waste Standards: These standards are still applicable since new wells could be installed in the future as part of O&M.

**Response:**

Agree. Text that states that these standards are not applicable will be removed. In addition, the following sentence will be added: "These requirements are applicable during future well installation activities."

**Additional Comment 38: p. 6-19, §6.5.3**

Modify the fourth sentence as follows: "the ARARs ~~were either addressed during construction or selection of the remedy and are no longer applicable, or have not been amended...~~" All of the "construction-related" ARARs are still applicable to required O&M of the remedy and should be retained. This change needs to be made to the "ARAR and Site-Specific Action Level Changes" in each chapter and to the ARARs Tables in each chapter.

**Response:**

Agree. The changes will be made. See previous relevant Responses to Additional Comments.

**Additional Comment 39: p. 6-24, §6.8**

Add two new bullets "At least yearly monitoring of Institutional Control compliance with the monitoring reports incorporated into future 5-year reviews." and "Amend O&M Manual with new AWQC values." Make this change to every Chapter where there is either ICs or where AWQCs are used for monitoring.

**Response:**

Agree. This change will be made.

**Additional Response:**

The Navy and EPA discussed this comment during the November 29, 2006 conference call. It was agreed that the AWQC bullets would not be added to Chapters 2, 4, or 6.

**Additional Comment 40: Table 6-2**

Since wastes were capped in place and will require long-term O&M, all of the Location-specific ARARs are still applicable. Remove the text from the "Current Status" column that states that standards are no longer applicable.

**Response:**

Agree. Comments that the requirements are no longer applicable will be replaced with the following sentence: "This regulation was addressed during cap construction. The requirement is applicable to future operations and maintenance of the remedy."

**Additional Comment 41: Table 6-3**

Since wastes were capped in place and require O&M, all of the Action-specific ARARs are still applicable.

**Response:**

Agree. Comments that the requirements are no longer applicable will be replaced with the following sentence: "This regulation was addressed during cap construction. The requirement is applicable to future operations and maintenance of the remedy."

**Additional Comment 42: p. 23-1, §23.2**

Add the following: "Conduct at least yearly monitoring of Institutional Control compliance with the monitoring reports incorporated into future 5-year reviews."

**Response:**

Agree with qualification. The following sentence will be added to the third bullet on p. 23-2:

"Also, verify that at least yearly monitoring of Institutional Control compliance has been conducted."

**Additional Comment 43: Table 23-1**

For each site where ICs are required, add "Initiate at least yearly monitoring of Institutional Control compliance".

**Response:**

Agree. This recommendation will be added to the table for Sites 2, 3, 6, 7, and 8.