

STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF WATER PROTECTION AND LAND REUSE  
REMEDIATION DIVISION



June 30, 2010

Via U.S. Mail and e-mail

Mr. James Gravette  
Remedial Project Manger (Code OPTE3-1)  
Environmental  
Naval Facilities Engineering Command Mid-Atlantic  
Bldg. Z-144  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

RE: Draft Record of Decision, Site 2B, Sediment at Area A Wetland, Naval Submarine Base New London, Groton, Connecticut

Dear Mr. Gravette:

The Remediation Division of the Bureau of Water Protection and Land Reuse has received and reviewed the report entitled "Record of decision Site 2B- Area A Wetland, Naval Submarine Base- New London, Groton, Connecticut" dated June 2010. TetraTech NUS, Inc. prepared the document on behalf of the Navy. The report describes the remedy proposed by the Navy to address contaminated sediments in the Area A Wetland (Site 2B). The Navy proposes to excavate approximately 3,240 cubic yards of sediment, dispose of that sediment off- site, to restore the wetlands, and to put in place land use controls to prevent potential future residential use of the site.

#### General Comments

1) Preferred Remedy

The DEP supports the proposed remedy and will issue a separate letter of concurrence addressed to both the Navy and EPA. DEP particularly appreciates the fact that the Navy has also elected to address the Phragmites that currently dominates the Area A Wetland. DEP is pleased to be able to work cooperatively with the Navy and EPA on this project.

#### Specific Comments

1) Page 3 Section 1.5 Statutory Determinations

The last sentence of the last paragraph should be re- written to indicate that 5 year reviews will be required because human health risks potentially remain at the site. It is not the use of LUCs that trigger the 5- year review requirement.

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2) Page 8 Section 2.2 Site History and Enforcement Activities

In Table 2.1, a number of phrases are highlighted in bold blue print in the Activities column. The highlighted phrases include "41 soil and sediment, 2 surface water and 7 groundwater samples", among others. The significance of the bold blue type is unclear as these terms are not defined in a glossary, and do not work as hyperlinks in the accompanying CD.

3) Page 10 Section 2.3 Community Participation

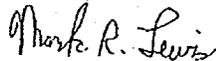
The first sentence of the paragraph captioned "Responsiveness Summary" is confusing. The sentence suggests that the announcement of the signing of a ROD might be made in a technical report or document, rather than through a newspaper announcement and press release. DEP believes the sentence intended to say that prior to announcing the selection of a remedy, feasibility studies or other relevant technical documents would be updated to reflect any updated information on human health risks. Please clarify.

4) Table E.1 ARARs

Please revise the Synopsis of Requirement for the State's Remediation Standard Regulations. The last sentence should state that the groundwater remediation standards are based on the GB classification of groundwater at the site. The Citation column for the Remediation Standards should also list appendices C, D, and E of the Remediation Standard Regulations, in addition to Appendices A and B. Appendices C to E are the numerical groundwater protection, surface water protection, and volatilization criteria for groundwater.

Please contact me at (860) 424-3768 if you have any questions.

Sincerely,



Mark R. Lewis  
Environmental Analyst 3  
Remediation Division  
Bureau of Water Protection and Land Reuse

cc: Ms. Kymberlee Keckler, U.S. Environmental Protection Agency, Region 1  
Federal Facilities Superfund Section, 5 Post Office Square, Suite 100,  
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Mr. Richard Conant, Naval Submarine Base New London, Environmental Department,  
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Mr. Corey E. Rich, P.E., Tetra Tech NUS, Inc., 661 Anderson Dr., Pittsburg, PA 15220-2745