

Bernhardt, Aaron

From: Keckler.Kymerlee@epamail.epa.gov
Sent: Wednesday, May 19, 2010 4:39 PM
To: james.gravette@navy.mil; richard.conant@navy.mil; Rich, Corey; mark.lewis@po.state.ct.us; Bernhardt, Aaron
Cc: rtfinlayson@gfnet.com; Peterson.David@epamail.epa.gov
Subject: Fw: Comments of the Area A Wetlands FS tables
Attachments: NLONAreaAWetlanddrafffinalFSTables.dpcmts.doc

As discussed earlier. Let me know if you have any questions.

Kymerlee Keckler, Chemical Engineer
Federal Facilities Superfund Section
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code: OSRR07-3
Boston, MA 02109-3912

Telephone: 617.918.1385

Facsimile: 617.918.0385

E-mail: keckler.kymerlee@epa.gov

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From: David Peterson/R1/USEPA/US
To: Kymerlee Keckler/R1/USEPA/US@EPA
Date: 05/19/2010 04:18 PM
Subject: Comments of the Area A Wetlands FS tables

These include the changes discussed in the call today.

Table ES-1, p. 1 – For Overall Protection of Human Health, Alternative 3 add at the end of the text: “Within excavation areas all contaminated sediment will be removed down to the subsurface dredge spoil layer and replaced with clean material. The remediated areas will be restored with native vegetation and invasive species will be controlled.”

For Compliance with ARARs, Alternative 2 insert “the cover is maintained and monitored and” before “adequate mitigation” and add a new last sentence: “The proposed remedy will include a TSCA risk-based finding that the proposed cover over PCB contaminated sediment exceeding the PRG of of 532 µg/kg will not pose an unreasonable risk of injury to health or the environment.”

For Compliance with ARARs, Alternative 3 remove “and floodplain resources” and add at the end “and the proposed remedy will include a finding that the PCB cleanup level of 532 µg/kg under TSCA risk-based standards will not pose an unreasonable risk of injury to health or the environment.”

For Long-Term Effectiveness, Alternative 3 add at the end: “and off-site disposal.”

For Implementability, Alternative 3 insert “(including dewatering, water treatment, and possibly solidification)” after “material processing.”

Table 9-1, p. 2 –

Connecticut Remediation Standard Regulations	CGS 22a-133k; RCSA 22a-133k-1 through 3 (Appendices A & B)	Relevant and Appropriate for sediment standards; Applicable for groundwater standards.	These regulations establish Direct Exposure Criteria (DECs) and Pollutant Mobility Criteria (PMCs) for contaminated soil based on either industrial or residential use of the site. The regulations also establish remediation standards for groundwater. Requirements are based on groundwater in the area being classified by the state as GB.	These regulations were used to assess potential human health risks from contaminated media. Soil standards were used to assess potential risks from contaminated sediment.
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Table 9-2, p. 1 – Fish and Wildlife Coordination Act, Synopsis replace “action to be taken” with “coordination with federal and state fish and wildlife resource agencies.”

Clean Water Act, Section 404, Requirement – Replace “CWA” with “Clean Water Act, Section 404.” Change the Citation to: “33 USC 1344; Section 404(b)(1); 40 CFR Part 230, 231 and 33 CFR Parts 320-323 and 332.”

Fish and Wildlife Coordination Act, Synopsis replace “action to be taken” with “coordination with federal and state fish and wildlife resource agencies.” Change the Evaluation text to: “The United States Fish and Wildlife Service (USFWS) and appropriate Connecticut departments would be consulted on how to minimize impacts of the sediment cover alternative and associated compensatory wetland mitigation on any fish and wildlife resources that may be dependent on Area A Wetland.

Clean Water Act, Section 404, Requirement – Replace “CWA” with “Clean Water Act, Section 404.” Change the Citation to: “33 USC 1344; Section 404(b)(1); 40 CFR Part 230, 231 and 33 CFR Parts 320-323 and 332.” Change the Evaluation text to: “The covering of contaminated sediments and associated compensatory wetlands mitigation, along with long-term monitoring activities, will meet the requirements of these standards.”

Table 11-3, p. 3 - CT Inland Wetlands and Watercourses, Evaluation – Replace “watercourse” with “wetland.”

Table 11-4, p. 2

Connecticut Remediation Standard Regulations	CGS 22a-133k; RCSA 22a-133k-1 through 3 (Appendices A & B)	Relevant and Appropriate for sediment standards; Applicable for groundwater standards.	These regulations establish Direct Exposure Criteria (DECs) and Pollutant Mobility Criteria (PMCs) for contaminated soil based on either industrial or residential use of the site. The regulations also establish remediation standards for groundwater. Requirements are based on groundwater in the area being classified by the state as GB.	The sediment excavation remedy and LUCs will address any contaminant risks posed at the Site.
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Fish and Wildlife Coordination Act, Synopsis replace “action to be taken” with “coordination with federal and state fish and wildlife resource agencies.” Change the Evaluation text to: “The United States Fish and Wildlife Service (USFWS) and appropriate Connecticut departments would be consulted on how to minimize impacts from the excavation alternative on any fish and wildlife resources that may be dependent on Area A Wetland.

Clean Water Act, Section 404, Requirement – Replace “CWA” with “Clean Water Act, Section 404.” Change the Citation to: “33 USC 1344; Section 404(b)(1); 40 CFR Part 230, 231 and 33 CFR Parts 320-323 and 332.” Change the Evaluation text to: “The excavation and off-site disposal of contaminated sediments will meet the requirements of these standards. The Navy has determine that this alternative is the least

damaging practicable alternative to protect wetland resources from Site contamination”

CT Inland Wetlands and Watercourses, Evaluation – Replace “watercourse” with “wetland.”

Table 11-4, p. 4 – TSCA, Evaluation – Change the text to: “The proposed remedy will include a finding that the excavation remedy’s PCB cleanup level of 532 µg/kg under TSCA risk-based standards will not pose an unreasonable risk of injury to health or the environment.”

Table 12-1 – Make the same changes as noted for Table ES-1, above.