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LETTER REGARDING THE TRANSMITTAL OF FINAL FEASIBILITY STUDY REPORT FOR OPERABLE UNIT 4 (OU 4) AND RESPONSES TO U S EPA REGION I COMMENTS ON REVISED DRAFT FINAL VERSION NSB NEW LONDON CT
12/17/2010
TETRA TECH NUS

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PITT-12-10-030

December 17, 2010

Project Number 112G02630

NAVFAC MID-ATLANTIC, Northeast IPT
Attn: Mr. Jim Gravette (Code OPTE3-1)
Bldg Z-144
9742 Maryland Avenue
Norfolk, Virginia 23511-3095

Reference: CLEAN Contract No. N62470-08-D-1001
Contract Task Order WE57

Subject: Final Lower Subase (Operable Unit 4) Feasibility Study
Naval Submarine Base-New London, Groton, Connecticut

Dear Mr. Gravette:

Please find enclosed two hard copies and two electronic copies (CDs) of the subject document for your records. Copies of the document were also distributed to the other members of the Naval Submarine Base – New London team per the distribution list provided below for their records.

The report includes the following information:

- Volume I – Sections 1 and 2
- Volume II – Sections 3, 4, and 5
- Volume III – Appendices A through B.4
- Volume IV – Appendices B.5 through E

Comments received from the Environmental Protection Agency (EPA) were addressed during preparation of the final Lower Subase Feasibility Study (FS) in accordance with the following response-to-comment document:

- Responses to EPA's August 25, 2010 Comments, October 7, 2010 Rebuttals, and November 10, 2010 Clarifications, Revised Draft Final Lower Subase Feasibility Study (Revision 4) – Final issued on November 12, 2010.

The Connecticut Department of Environmental Protection (CTDEP) acknowledged their acceptance of the Revised Draft Final Lower Subase FS (July, 2010) in two emails sent on August 11, 2010; therefore, no additional revisions were necessary.

As discussed during the December 14, 2010 New London production meeting, an FS Addendum is currently being prepared with the data collected under the Lower Subase Soil and Groundwater Pre-Design Investigations to augment this final Lower Subase FS. It is expected that the draft FS Addendum will be submitted to the New London Team in January/February 2011. The information provided in both the Lower Subase FS and FS Addendum will be used to support selection of remedial alternatives in the Proposed Plan and Record of Decision.

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TETRA TECH

If you have any questions regarding the enclosed document, please contact me at (412) 921-8984.

Sincerely,

Corey A. Rich, P.E.
New London Base Coordinator/Project Manager

CAR/clm

Enclosure(s)

c: Ms. Kymberlee Keckler, EPA Region 1 (4 copies/4 CDs)
Mr. Mark Lewis, CTDEP (1 copy/1 CD)
Mr. Ken Finkelstein, NOAA (1 CD)
Mr. Ken Munney, USF&W (1 CD)
Mr. Richard Conant, NSB-NLON (1 copy/3 CDs)
Mr. Val Jurka, NAVFAC Atlantic (1 CD)
Mr. Peter Golonka, Gannett Fleming (2 copies/2 CDs)
Mr. Garth Glenn, Tetra Tech-Norfolk (letter only)
Mr. Glenn Wagner, Tetra Tech-PITT (1 copy/1 CD)
Ms. Nina Balsamo, Tetra Tech-PITT (1 copy/1 CD)
CTO WE57 – File Copy (1 copy/1 CD)

RESPONSES TO EPA's AUGUST 25, 2010 COMMENTS, OCTOBER 7, 2010 REBUTTALS, AND NOVEMBER 10, 2010 CLARIFICATIONS
REVISED DRAFT FINAL (REVISION 4) LOWER SUBASE FEASIBILITY STUDY
NSB-NLON, GROTON, CONNECTICUT

Dates Issued: September 16, 2010 (Revision 1); November 4, 2010 (Revision 2); November 12, 2010 (Revision 3)

GENERAL COMMENTS

General Comment (GC) 1:

According to the Human Health Risk Assessment, Zones 2, 3, 5, 6 do not have any excess CERCLA risk. Consequently, there are no RAOs, ARARs, or TBCs for these zones, and discussion of CERCLA in the context of these zones is not appropriate. Remedial alternatives for these zones should be developed only to address state cleanup standards. Navy did this for Zone 6 but not for Zones 2, 3, and 5. EPA understands that the HHRA retained lead as a COC for Zone 3 even though lead modeling indicated there are no excess risks from lead on the basis that some elevated lead concentrations were detected.

Response: Agree with clarification. The carcinogenic risks for Zones 2, 3, and 5 that were estimated in the current human health risk assessment (HHRA) are within EPA's risk range ($1x10^{-6}$ to $1x10^{-4}$), but at levels that a risk manager may request further evaluation in an FS. The Navy elected to retain the CERCLA evaluation process for these zones until the results of the ongoing Lower Subase Soil Pre-Design Investigation (PDI) are available. The New London Team agreed that the PDI data would be evaluated after the completion of the Lower Subase FS, but prior to the Operable Unit (OU) 4 ROD, in a Soil PDI Completion Report. It is possible that the results of the Soil PDI will change the HHRA results; therefore, making significant changes (e.g., removing RAOs, ARARs, and TBCs) to the FS at this point is unwarranted. The HHRA will be revisited in the Soil PDI Completion Report and the results will be used to determine the appropriate regulatory program to use to further evaluate the zones.

Further explanation is necessary for lead-contaminated soil at Zone 3. A Time-Critical Removal Action was previously completed at that site. Lead-contaminated soil in a portion of this site was remediated through solidification and replacement at the site. The current HHRA only considered lead data for samples collected outside of the treated areas. Because the HHRA did not consider the treated soil, which originally had the highest lead concentrations, there is uncertainty associated with the risk posed by the site. Lead was retained as a COC because of this uncertainty.

It should also be noted that even though Zone 6 is currently considered a petroleum-only site, the site's status will also be re-evaluated after the completion of the Soil PDI and the final HHRA.

EPA 10/7/10 Rebuttal: DP1 - Rather than include a substantial amount of information that currently is not relevant to evaluating a CERCLA remedy, wouldn't the record be clearer and the document significantly shorter to take all of the information out? The draft text could always be reused for an amended FS if the PDI identified contaminant levels that posed a CERCLA risk.

At the very least the text for each Zone should identify that presently, no CERCLA risk has been identified and that no action under CERCLA is required for the Zone.

Response to Rebuttal: Agree with clarification. The Navy is aware of the uncertainty regarding CERCLA risks associated with the soil at Zones 2, 3, and 5 and the groundwater at Zones 1, 4, and 7. Soil and groundwater PDIs were completed to collect the additional data required to address these uncertainties. Instead of making substantial changes to the Lower Subase FS, the Navy intends to finalize the FS and then prepare an FS Addendum that incorporates and evaluates the PDI data. The addendum will include updated zone-specific risk assessments, volume estimates, and cost estimates for all zones. In addition, revised alternative analyses will be completed if the CERCLA risk assumptions used as the basis for the Lower Subase FS are no longer appropriate.

The FS addendum will be finalized prior to completion of the OU4 PRAP and ROD and it will provide the documentation required for the Administrative Record. To document this approach, the following text will be added to the appropriate sections of the Lower Subase FS:

Section 4.3 (Zone 2), p. 4-28:

"Even though there is uncertainty regarding Zone 2 soil presenting a CERCLA risk, the Navy has opted to develop and evaluate soil alternatives following the CERCLA process. Additional data will be collected during a Soil PDI that will be used to address the uncertainty regarding the risk and the appropriateness of the CERCLA evaluation process for Zone 2 soil. The new data and updated evaluation will be captured in an addendum to this FS.

The following soil remedial alternatives have been developed for Zone 2 of the Lower Subase:"

Section 4.4 (Zone 3), p. 4-53:

"Even though there is uncertainty regarding Zone 3 soil presenting a CERCLA risk, the Navy has opted to develop and evaluate soil alternatives following the CERCLA process. Additional data will be collected during a Soil PDI that will be used to address the uncertainty regarding the risk and the appropriateness of the CERCLA evaluation process for Zone 3 soil. The new data and updated evaluation will be captured in an addendum to this FS.

The following soil remedial alternatives have been developed for Zone 3 of the Lower Subase:"

Section 4.6 (Zone 5), p. 4-109:

"Even though there is uncertainty regarding Zone 5 soil presenting a CERCLA risk, the Navy has opted to develop and evaluate soil alternatives following the CERCLA process. Additional data will be collected during a Soil PDI that will be used to address the uncertainty regarding the risk and the appropriateness of the CERCLA evaluation process for Zone 5 soil. The new data and updated evaluation will be captured in an addendum to this FS.

The following soil remedial alternatives have been developed for Zone 5 of the Lower Subase:"

Section 4.9 (Zone 1), p. 4-174:

"Even though there is uncertainty regarding Zone 1 groundwater presenting a CERCLA risk, the Navy has opted to develop and evaluate groundwater alternatives following the CERCLA process. Additional data will be collected during a Groundwater PDI that will be used to address the uncertainty regarding the risk and the appropriateness of the CERCLA evaluation process for Zone 1 groundwater. The new data and updated evaluation will be captured in an addendum to this FS.

The following alternatives have been developed for groundwater remediation at Zone 1:"

Section 4.10 (Zone 4), p. 4-196:

"Even though there is uncertainty regarding Zone 4 groundwater presenting a CERCLA risk, the Navy has opted to develop and evaluate groundwater alternatives following the CERCLA process. Additional data will be collected during a Groundwater PDI that will be used to address the uncertainty regarding the risk and the appropriateness of the CERCLA evaluation process for Zone 4 groundwater. The new data and updated evaluation will be captured in an addendum to this FS.

The following alternatives have been developed for groundwater remediation at Zone 4:"

Section 4.11 (Zone 7), p. 4-219:

"Even though there is uncertainty regarding Zone 7 groundwater presenting a CERCLA risk, the Navy has opted to develop and evaluate groundwater alternatives following the CERCLA process. Additional data will be collected during a Groundwater PDI that will be used to address the uncertainty regarding the risk and the appropriateness of the CERCLA evaluation process for Zone 7 groundwater. The new data and updated evaluation will be captured in an addendum to this FS.

The following alternatives have been developed for groundwater remediation at Zone 7:"

GC2:

Regarding the tables in Section 1, the April 2009 Regional Screening Level (RSL) values have been retained, although a revised RSL table dated May 2010 has been issued. Although most of the values have not changed with the table revision, the values for chromium have changed significantly. The screening value used throughout the Section 1 tables for chromium VI in soil is 23 mg/Kg based on an HQ=0.1 whereas the new value for chromium VI for soil is 0.29 mg/Kg based on carcinogenic risk. Similarly, the screening value for chromium VI in groundwater used throughout the Section 1 tables is 11 µg/L based on an HQ=0.1 whereas the new value is 0.043µg/L based on carcinogenic risk. However, background for total chromium at the base in surface soil is 19.3 mg/Kg, although a background value for chromium VI was not identified. While the chromium concentration detected at the site may contain little to no chromium VI, the speciation that will be conducted for the soil PDI will verify whether any reconsideration of chromium VI as a contaminant of concern for the Lower Subase is necessary.

Response: Comment noted. The tables presented in Section 1 of the FS are from the approved final HHRA documented in Appendix A of the FS. The resolution from the April 2, 2010 meeting was that the HHRA presented in the FS would not be revised to address the chromium issue at this time. It was decided that additional soil samples would be collected in Zones 4 and 7 during the Soil PDI and analyzed for chromium speciation [Cr (III) and Cr (VI)]. The HHRA will then be revised using the PDI results and the most current risk screening levels (RSLs) and the results documented in the Soil PDI Completion Report. All of this information will be subsequently captured in the OU4 ROD. No changes are required to the current FS.

GC3:

The resolution from the April 6, 2010 meeting was that the appropriate ORNL RSL for chromium would be incorporated into the risk assessment based on the speciation determined during the soil PDI sampling.

Response: See Response to GC2. No changes are required to the current FS.

GC4:

In the Section 5 Comparative ARARs Tables, make the changes specified in Attachment A for the Chapter 2 and 4 ARARs tables.

Response: Agree with clarification. Section 5 Comparative ARAR Tables will be revised to be consistent with final resolution to comments on Chapters 2 and 4 ARAR Tables.

GC5:

In the Section 5 Comparative Assessment of Alternatives Tables, make the changes specified in Attachment A for the ES Tables and in the comments to the Section 5 text.

Response: Agree with clarification. Section 5 Comparative Assessment of Alternatives Tables will be revised to be consistent with final resolution to comments on the ES Tables and comments on Section 5 text.

SPECIFIC COMMENTS

Specific Comment (SC) 1: p. ES-1, §E.1

In the first paragraph, at the end of the second sentence add: “, 42 U.S.C. §§9601 *et seq.*”

> **Response:** Disagree. The citation of the CERCLA laws is not necessary for introductory text of an Executive Summary.

SC2: p. ES-2, last ¶

In the last sentence remove “until” before “to February…”

> **Response:** Agree. This correction will be made.

SC3: p. ES-3, §E.3

In the second sentence replace “formal” with “CERCLA” and in the third sentence remove “informal” and add at the end of the sentence: “ in accordance with State standards.”

> **Response:** Agree. The corrections will be made.

SC4: p. ES-4, ¶8

In the second sentence insert “via groundwater” after “migration to surface water.”

> **Response:** Agree. This correction will be made.

SC5: p. ES-4, ¶9

In the first sentence insert “hypothetical future residents and” after “Prevent exposure of…”

> **Response:** Disagree. The current text is identical to the January 2010 version of the FS. The RAO is accurate.
>
> **EPA 10/7/10 Rebuttal:** DP2 **-** Should the RAO be changed to include “hypothetical future residents” since it is the basis for requiring an IC against residential use of the site?
>
> **Response to Rebuttal:** Agree with clarification. Hypothetical future residents will be added as requested. However, it should be noted that hypothetical future residents were not identified as receptors of concern for groundwater and were not evaluated in the human health risk assessment. The groundwater is brackish and classified as GB by the State of Connecticut and cannot be used without treatment.

SC6: p. ES-5, ¶6

In the third sentence replace “informal” with “State-compliant.”

> **Response:** Agree. This correction will be made.

SC7: p. ES-5, ¶7

Should “hypothetical future residents and” be inserted after “Prevent…?”

Response: Disagree. This paragraph discusses LNAPL which the EPA has indicated is not their concern. The current text is identical to the January 2010 version. The RAO is accurate.

EPA 10/7/10 Rebuttal: DP3 - Although the LNAPL is not a CERCLA remedy, the proposed alternatives do include ICs to prevent residential use based in part on the presence of LNAPL.

Response to Rebuttal: Agree. Hypothetical future residents will be added as requested.

SC8: p. ES-9, bullet 1

Under a No action alternative you don't eliminate controls that already exist (such as an existing asphalt cover). Any controls that currently are in place are not part of the CERCLA remedy and therefore can be changed or eliminated at the discretion of the Navy (independent of CERCLA).

Response: Agree. The paragraph will be replaced with the following paragraph, which uses text similar to Comment SC65 (below):

"The No Action alternatives are required by CERCLA as baselines for comparison to other alternatives and would not include any new environmental action and any existing administrative or engineering environmental controls would not be an enforceable part of a CERCLA remedy. The only action for these alternatives would be the performance of CERCLA-mandated five-year reviews to periodically evaluate site status. A No Action alternative cannot be chosen because contamination remains on site."

SC9: p. ES-9, bullet 2

Replace the third sentence with: "As long as the property is owned by the Navy, these LUCs would be implemented as part of NSB-NLON's Standard Operating Procedures Administration (SOPA) Instruction 5090.25. If the property is transferred the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

Response: Agree with clarification. The subject sentence will be replaced with the following:

"As long as the property is owned by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC Remedial Design (RD) that will be prepared by the Navy as the LUC component of the remedy. If the property is transferred out of federal ownership, the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

Additional comment: Given the proposed text revision, the text should also discuss how LUCs would be maintained in the event of a transfer from the Navy to another federal agency.

Response to Additional Comment: The subject replacement text will be revised as follows:

"As long as the property is owned by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC Remedial Design (RD) that will be prepared by the Navy as the LUC component of the remedy. If the property is transferred out of federal ownership, the LUCs would be converted into deed restrictions, which would comply with State recording standards. If the property is transferred to another federal agency, the Navy would ensure the federal agency taking over the property was formally made aware of the (1) environmental status of the installation, to include all LUCs, and (2) the requirement imposed in the ROD and described in the LUC RD to keep such LUCs in place until such time as they are no longer required. Monitoring of compliance with LUCs will occur at least yearly."

SC10: p. ES-10, ¶1

Add a new second sentence: "LUC would be implemented and monitored in the manner described under the

LUCs (Engineering and Institutional Controls) and Monitoring alternatives."

Response: Disagree. This section is intended to be a very brief description of the alternatives. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP4 **-** Unclear why the sentence cannot be added since LUCs are a significant component of most of the alternatives.

Response to Rebuttal: Agree. The requested sentence will be added.

SC11: p. ES-10, ¶2

Add a new ninth sentence: "LUC would be implemented and monitored in the manner described under the LUCs (Engineering and Institutional Controls) and Monitoring alternatives."

Response: Disagree. This section is intended to be a very brief description of the alternatives. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP5 **-** See comment dp4.

Response to Rebuttal: Agree. The requested sentence will be added.

SC12: p. ES-11, bullet 1

Add a new tenth sentence: "LUC would be implemented and monitored in the manner described under the LUCs (Engineering and Institutional Controls) and Monitoring alternatives."

Response: Disagree. This section is intended to be a very brief description of the alternatives. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP6 **-** See comment dp4.

Response to Rebuttal: Agree. The requested sentence will be added.

SC13: p. ES-11, ¶3

Modify the sentence to state: "The following five types of groundwater alternatives were developed for Zones 1, 4, and 7 (groundwater cleanup standards only need to be met beyond the compliance boundary for each Zone):"

Response: Agree. This correction will be made.

SC14: p. ES-11, bullet 3

In the third sentence, the estimates for the MNA periods for the alternatives should be for CERCLA contaminants only (it can be noted if it will take longer to meet State TPH standards).

Modify the fourth sentence to: "LUCs would be similar to those proposed for soil and would reinforce the state-issued GB classification by controlling access to and use of groundwater (as long as the property is owned by the Navy) through NSB-NLON SOPA Instruction 5090.25. If the property is transferred the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

Response:

(a) Agree. This correction will be made.

(b) Agree with clarification. The subject sentence will be replaced with the following:

"As long as the property is owned by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC RD that will be prepared by the Navy as the LUC component of the remedy. If the property is transferred out of federal ownership, the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

Additional comment: Given the proposed text revision, the text should also discuss how LUCs would be maintained in the event of a transfer from the Navy to another federal agency.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC9.

SC15: p. ES-12, bullet 1

In the last sentence remove ", with the difference that monitoring would only be performed for 5 years." Monitoring would be required as long a CERCLA contamination above unrestricted risk levels is present within each Zone.

Response: Disagree. The current text is identical to the January 2010 version. For these alternatives, RAOs are expected to be met within 1 year, so a monitoring period of only 5 years was assumed.

EPA 10/7/10 Rebuttal:

DP7 - If groundwater will be treated so that compliance standards are met beyond the compliance zone then IC for groundwater will need to be long term. If all groundwater in the zone will be treated to meet groundwater standards that the Navy's interpretation is correct (but the ROA only requires meeting the cleanup standards beyond the compliance zone). To the extent soil contamination exceeding CERCLA risk standards is left in place – groundwater monitoring will be required as a component of the soil remedy.

KK1 - Please qualify that monitoring is expected to be required based on the effectiveness of the treatment.

Response to Rebuttal: Agree with clarification. As stated in the original response, RAOs are expected to be met within 1 year so a monitoring period of 5 years was assumed. The subject text will be updated to clarify the issue as follows:

"LUCs and monitoring would be identical to those for Alternatives GW 1.2, GW-4.2, and GW-7.2, with the exception that monitoring was assumed to only be required for 5 years. The actual duration of monitoring will be dependent on the effectiveness of the treatment."

SC16: p. ES-13, bullet 3

Modify the last sentence: "As long as access to the capped area is controlled by the Navy, these LUCs would be implemented as part of NSB-NLON's Standard Operating Procedures Administration (SOPA) Instruction 5090.25, in coordination with the State, which owns the subtidal area. If the adjacent shoreline property is transferred such that the Navy no longer controls access to the capped area, the LUCs would be converted into land use restrictions, which would comply with State standards. Monitoring of compliance with LUCs will occur at least yearly."

Response: Agree with clarification. The subject sentence will be replaced with the following:

"As long as the property is owned by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC RD that will be prepared by the Navy as the LUC component of the remedy. If

the property is transferred out of federal ownership, the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

EPA 10/7/10 Rebuttal: DP8 - The important issue to note is that the Navy does not own the subtidal land to be capped, the State does, so the Navy can control access as long as it controls the adjacent base, but it needs to coordinate the placement of land use restrictions with the State on the State property. EPA recommends the following paragraph:

"As long as access to the capped area is controlled by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC RD that will be prepared by the Navy as the LUC component of the remedy, in coordination with the State, which owns the subtidal area. If the adjacent shoreline property is transferred such that the Navy no longer controls access to the capped area, the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

Response to Rebuttal:

Agree with clarification. The following paragraph will be incorporated as appropriate into the Lower Subase FS for sediment alternatives.

"As long as access to the capped area is controlled by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC RD that will be prepared by the Navy as the LUC component of the remedy, in coordination with the State, which owns the subtidal area. If the adjacent shoreline property is transferred such that the Federal government no longer controls access to the capped area, the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

Additional comment: Given the proposed text revision, the text should also discuss how LUCs would be maintained in the event of a transfer from the Navy to another federal agency.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC9.

SC17: Table ES-3, p. 1

For the Reduction of Toxicity, Mobility, or Volume through Treatment criterion, the text for all of the alternative except S.1-3 should be "Does not meet this criterion." Remove all of the other text ("natural processes," excavation, off-site disposal and off-site treatment do not meet this criterion). For S.1-5 remove any reference to LNAPL (not CERCLA waste, so not evaluated under the NCP criteria).

Response: Disagree. The text in the table is clear on what is treated and what is disposed. The LNAPL reference is included because it would be removed coincidentally in this alternative.

EPA 10/7/10 Rebuttal:

DP9 - The Table addresses how each alternative meets or doesn't meet the NCP criterion, which strictly addresses only treatment alternatives. "Natural Processes," excavation, and off-site disposal are not treatment and do not satisfy CERCLA's preference for remedies that treat contamination.

KK2 - Toxicity and volume are not reduced by off-site disposal. Further qualification of the disposition of the waste is required if the Navy wanted to retain language similar to that used.

Response to Rebuttal: Agree with clarification. The clarifying text will be removed and replaced with "There is no treatment."

SC18: Table ES-3, p. 2

Short-term effectiveness: Remove the added yellow text for S.1-1 and S.1-2. Rather than stating one alternative has greater risks than another, identify what risks are present under each alternative.

Implementability: Identify the implementabilty issues with each alternative rather than just saying one is easier to implement than another (they each have different implementability issues, so it is not directly comparable).

Please make these same changes to Tables ES-4 through ES-9.

Response:

(a) Disagree. The text was provided as sample text in the final (June 11, 2010) RTC document. The purpose of the revision was to change "natural attenuation" to "natural processes", and to change "would" to "might". Otherwise, the text is the same as the January 2010 version. Per the response to SCA 19 of the June 11, 2010 final RTC document, the table is intended to be a summary comparative table of the extent to which the various remedial alternatives for a given environmental medium in a given zone do or do not comply with the seven CERCLA evaluation criteria. Explanation of how or why the indicated degree of compliance would or would not be achieved is not in the scope of these tables and can be found instead in the text of Sections 4.0 and 5.0. Therefore, no changes will be made.

(b) Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. Per the response to SCA 19 of the June 11, 2010 final RTC document, the table is intended to be a summary comparative table of the extent to which the various remedial alternatives for a given environmental medium in a given zone do or do not comply with the seven CERCLA evaluation criteria. Explanation of how or why the indicated degree of compliance would or would not be achieved is not in the scope of these tables and can be found instead in the text of Sections 4.0 and 5.0. Therefore, no change will be made.

(c) Disagree, per the preceding responses, no other changes are required to the tables.

EPA 10/7/10 Rebuttal:

DP10 - (a) This argues against the Navy's position in that the Table should state whether the alternative meets the criterion or not, rather than stating that one alternative does a better job of meeting the criterion or another. There's no context for stating why one alternative is considered more effective.

(b) DP11 - See comment dp10.

Response to Rebuttal:

(a) Agree. The subject text (highlighted in yellow under the short-term effectiveness criteria evaluation) will be removed from the table.

(b) Agree. Specific implementability issues will be detailed in the table.

SC19: Table ES-10, p. 1

Alternative GW-1.2 is not protective because of the long time required to meet groundwater standards through MNA.

For the Treatment Criterion, change the text for Alternative GW-1.1, GW-1.2, and GW-1.4 to: "Does not meet this criterion." MNA and extraction with off-site disposal does not meet this criterion. In the first

sentence of the text for GW-1.5, change “by extraction and off-site disposal” to “by on-site treatment.”

Response:

(a) Disagree with clarification. While the long period of time for MNA affects the protectiveness and effectiveness of the alternative, per the final (June 11, 2010) Response to SCA 117, LUCs and long-term monitoring components will be protective and effective. Therefore, the phrase “somewhat protective” was used in the revised draft final FS. No changes are proposed.

(b) Disagree with comments on GW-1.1 and GW-1.2, because the text is clear on what is treated. Agree with Comments on GW-1.4 and GW-1.5. The text for GW-1.4 and GW-1.5 will be corrected.

EPA 10/7/10 Rebuttal:

DP12 – (a) Unless an MNA alternative meets the standards under the MNA guidance (achieves cleanup standards within a reasonable time period compared to active remedial alternatives) the alternative is not protective.

KK3 – (a) The response is not acceptable. The resolution at the April 6, 2010 meeting was that GW-1.2 would be considered unprotective and ineffective, as stated by Navy in their May 11, 2010 response (SCA 23) and retained in the June 11, 2010 response document. EPA therefore expects these tables to reflect that decision. If the Navy wants to add qualifying language similar to that in their responses, it must retain it as unprotective and ineffective. This requirement needs to be carried through the rest of the FS.

DP13 (b) **-** These alternatives do not include active treatment so they don’t meet the criterion.

Response to Rebuttal:

(a) Agree with clarification. The Navy agrees that the NA component of the groundwater alternatives would be unprotective and ineffective because of the long time to reach CTDEP PRGs. However, based on the current groundwater dataset, the LUCs and long-term monitoring components of these alternatives would be protective and effective since there do not appear to be any CERCLA risks. With some uncertainties in the groundwater dataset, a groundwater PDI is underway to confirm this CERCLA determination.

Therefore, as stated in GC 1, instead of making substantial changes to the Lower Subase FS by revising these groundwater alternatives to exclude the NA component at this time, the Navy intends to finalize the FS, complete the groundwater PDI, and then prepare an FS Addendum that incorporates and evaluates the PDI data. The FS Addendum will reflect the fact that NA has been excluded from the groundwater alternatives.

Additional comment: **OK, since if the PDI determines there is no CERCLA risk there won't be any alternatives and if there is a CERCLA risk, MNA will be removed (an alternative with LUCs and long-term monitoring would only be retained if contaminated groundwater that poses a CERCLA risk remains solely within the compliance zone for a waste management area, otherwise only an alternative involving treatment would be compliant).**

Response to Additional Comment: Additional comment is acknowledged.

(b) Agree. The phrase “There is no treatment” will be included for Alternatives GW-1.1 and 1.2 under the treatment criterion evaluation.

SC20: Table ES-10, p. 2

Short-term effectiveness: Rather than stating one alternative has greater risks than another, identify what risks are present under each alternative.

Implementability: Identify the implementabilty issues with each alternative rather than stating one is easier to implement than another (they each have different implementability issues, so it is not directly comparable).

Same comments as for ES-11.

Response:

(a) Disagree. This issue was not previously identified by EPA and a change was not required per the June 11, 2010 final RTC document. The current text is identical to the text included in the January 2010 version of the FS. Per the response to SCA 19 of the June 11, 2010 final RTC document, the table is intended to be a summary comparative table of the extent to which the various remedial alternatives for a given environmental medium in a given zone do or do not comply with the seven CERCLA evaluation criteria. Explanation of how or why the indicated degree of compliance would or would not be achieved is not in the scope of these tables and can be found instead in the text of Sections 4.0 and 5.0. Therefore, no change will be made.

(b) Disagree. This issue was not previously identified by EPA and a change was not required per the June 11, 2010 final RTC document. The current text is identical to the text included in the January 2010 version of the FS. Per the response to SCA 19 of the June 11, 2010 final RTC document, the table is intended to be a summary comparative table of the extent to which the various remedial alternatives for a given environmental medium in a given zone do or do not comply with the seven CERCLA evaluation criteria. Explanation of how or why the indicated degree of compliance would or would not be achieved is not in the scope of these tables and can be found instead in the text of Sections 4.0 and 5.0. Therefore, no change will be made.

(c) Disagree, per the preceding responses, no other changes to the tables are required.

EPA 10/7/10 Rebuttal:

DP14 – (a) The Table, as written doesn't state whether or not each alternative meets or doesn't meet the criterion. As previously, state that one alternative is more effective than another has little meaning if there no context as to why.

DP15 – (b) The Table, as written doesn't state whether or not each alternative meets or doesn't meet the criterion. As previously, state that one alternative is more implementable than another has little meaning if there no context as to why.

Response to Rebuttal:

(a) Agree. The relevant factors that impact the short-term effectiveness compared to the other alternatives will be noted.

(b) Agree. The relevant factors that impact the implementability compared to the other alternatives will be noted.

SC21: Table ES-12, p, 1

For the Treatment Criterion, the text for Alternative GW-3.1, GW-3.2, and GW-4.4 should be: "Does not meet this criterion." MNA and extraction with off-site disposal does not meet this criterion. In the first sentence of the text for GW-3.5, change "by extraction and off-site disposal" to "by on-site treatment."

Response: Clarification – this comment should refer to Alternatives GW-7.1, -7.2, -7.4, and 7.5. Disagree with comments on GW-7.1 and GW-7.2, because the text is clear on what is treated. Agree with Comment on GW-7.4 and GW-7.5. The text for GW-7.4 and GW-7.5 will be corrected.

EPA 10/7/10 Rebuttal: DP16 **-** These alternatives do not include active treatment so they don't meet the criterion.

Response to Rebuttal: Agree. The phrase "There is not treatment" will be incorporated into Table ES-12 for Alternatives GW-7.1 and GW-7.2.

SC22: Table ES-12, p. 2

Short-term effectiveness: Rather than stating one alternative has greater risks than another, identify what risks are present under each alternative.

Implementability: Identify the implementabilty issues with each alternative rather than stating one is easier to implement than another (they each have different implementability issues, so it is not directly comparable).

Response:

(a) Disagree. See the response to SC20(a).

(b) Disagree. See the response to SC20(b).

EPA 10/7/10 Rebuttal:

DP17 – (a) See previous EPA response.

DP18 – (b) See previous EPA response.

Response to Rebuttal:

(a) Agree. See response to rebuttal for SC20(a).

(b) Agree. See Response to Rebuttal for SC20(b).

SC23: Table E3-13, p. 1

Unless an alternative includes on-site treatment (direct treatment of dredged sediment, treatment of dewatering liquids), the text for the Treatment criterion should be: "Does not meet the criterion." Capping, off-site disposal, off-site treatment, or dredging should not be discussed under this criterion.

Short-term effectiveness: Rather than stating one alternative has greater risks than another, identify what risks are present under each alternative.

Implementability: Identify the implementabilty issues with each alternative instead of stating that one is easier to implement than another (they each have different implementability issues, so it is not directly comparable).

Response:

(a) Disagree. This issue was not previously identified by EPA and a change was not required per the June 11, 2010 final RTC document. The current text is identical to the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. Therefore, no change will be made.

(b) Disagree. See the response to SC20(a).

(c) Disagree. See the response to SC20(b).

EPA 10/7/10 Rebuttal:

DP19 – (a) It is irrelevant whether there was a previous comment. The text needs to properly identify whether the alternative meets the criterion or not. See previous comments concerning compliance with the Treatment criterion.

DP20 **-** (b) See previous EPA response.

DP21 - (c) See previous EPA response.

KK4 **-** Toxicity and volume are not reduced by capping and off-site disposal. Further qualification of the disposition of the waste is required if the Navy wants to retain language similar to that used.

Response to Rebuttal:

(a) Alternatives SD-3 and SD-6 include on-site treatment of dewatering fluids. The description of this treatment will be retained in the Treatment criterion evaluation for these alternatives. The text for the Treatment criterion for Alternatives SD-4 and SD-7 will be changed to the following: "There is no treatment" Neither alternative includes active on-site treatment.

(b) Agree. See response to rebuttal for SC20(a).

(c) Agree. See response to rebuttal for SC20(a).

SC24: Table ES-2

Please add a footnote to clarify what *Dredge* and *Pre-dredge* mean as the Navy response (SCA 18) indicated.

Response: Agree. The change should have been made per the Response to SCA 18 provided in the final (June 11, 2010) RTC document. A footnote will be added to Table ES-2 to indicate that "Dredge" refers to the volume of sediment to be removed for alternatives where all contaminated sediment would be removed (Alternatives SD-6 and SD-7) and "Pre-Dredge" refers to the volume of sediment to be removed prior to capping (Alternatives SD-3 and SD-4).

SC25: Table ES-10

The resolution at the April 6, 2010 meeting was that GW-1.2 would be considered unprotective and ineffective, as stated in the May 11, 2010 response (SCA 23). Please edit GW-1.2 accordingly here and in subsequent sections.

Response: Disagree with clarification. See the response provided for SC19a.

EPA 10/7/10 Rebuttal: DP22 - See previous EPA response concerning the requirements for an MNA alternative to be protective.

KK5 - See EPA's rebuttal comment on SC19a.

Response to Rebuttal: See the Response to Rebuttal for SC19(a).

SC26: Table ES-11

The resolution at the April 6, 2010 meeting was that GW-4.2 would be considered unprotective and ineffective, as stated in the May 11, 2010 response (SCA 23 and 24; there is no GW-2.2). Please edit GW-4.2 accordingly here and in subsequent sections.

Response: Disagree with clarification. See the response provided for SC19a.

EPA 10/7/10 Rebuttal: DP23 - See previous EPA response concerning the requirements for an MNA alternative to be protective.

KK6 **-** See EPA's rebuttal comment on SC19a.

Response to Rebuttal: See the Response to Rebuttal for SC19(a).

SC27: p. 1-81, ¶1

Change the last sentence to: "Concentrations of individual and total Aroclors were greater than the 1,000 µg/kg Toxic Substances Control Act (TSCA) regulation risk-based threshold." [Note: The rest of the sentence is removed since the level discussed relates to sediment PCB levels requiring disposal in a TSCA disposal facility, not a limit on the jurisdiction of TSCA. If there is a human health or ecological risk from PCB, TSCA applies.]

Response: Agree with clarification. See the Response to SCA36 in the final (June 11, 2010) RTC document. The disposal threshold is also important to the FS. The subject sentence will be changed as follows:

"Concentrations of individual and total Aroclors were greater than the 1,000 µg/kg Toxic Substances Control Act (TSCA) regulation risk-based threshold; therefore, TSCA applies. However, the concentrations were less than the 50,000 µg/kg criterion that would require disposal of the sediment as a PCB waste in a TSCA landfill."

SC28: p. 1-81, §1.2.9.3

In the last sentence of the first paragraph, the text has not been edited per the Navy's response. It should read: "… which is the concentration at which the sediment would require disposal in a TSCA landfill as a PCB waste."

Response: This comment directly conflicts with SC27. See Response to SC27. The text provided in the Response to SC27 will be incorporated into the FS.

SC29: p. 1-82, ¶4

See previous comment regarding PCB levels and TSCA.

Response: Agree with clarification. See the Response to SC27. The subject sentence will be changed as follows:

"Concentrations of individual and total Aroclors were greater than the 1,000 µg/kg Toxic Substances Control Act (TSCA) regulation risk-based threshold; therefore, TSCA applies. However, the concentrations were less than the 50,000 µg/kg criterion that would require disposal of the sediment as a PCB waste in a TSCA landfill."

SC30: Table 1-3

a) This table uses the April 2009 Regional Screening Levels. While most of the values have not changed with the issuance of the May 2010 RSL table, it is noted that the new value for chromium VI is 0.29 mg/Kg based on carcinogenic risk, whereas the value in this table is 23 mg/Kg based on an HQ=0.1. One sample result for chromium exceeded the May 2010 value.

b) Please make the superscripts for the chromium RSL more legible (*i.e.,* notes 10 and 11).

Response:

(a) Disagree. See Response to GC2.

(b) Agree. The superscripts will be made to be more legible.

SC31: Tables 1-39, 1-53

Footnote 1 refers to residential criteria but has been used in the tables for construction worker and full-time employee. Please review other tables for similar corrections.

Response: The footnotes will be revised to indicate industrial screening criteria are presented for the construction worker and full-time employee.

SC32: Figure 1-4

This figure incorrectly identifies 13MW20 and 13MW21.

Response: Agree. Well label 13MW21/13TB17 will be changed to 13MW20/13TB17 and well label /13TB15 will be changed to 13MW21/13TB15.

SC33: Figure 1-11

The extent increased to the north and decreased on the south and it now has deleted sample locations south of Pier 15. Please correct.

Response: Agree. Figure 1-11 will be corrected so that the legend does not cover a portion of Zone 7.

SC34: p. 2-1, §2.1

a) The last sentence in the first paragraph states that surface and subsurface soil have been retained as media of CERCLA concern for all zones because of potential unacceptable human risk. However, the HHRA found no unacceptable risk for soil in Zones 2, 3, 5, and 6.

b) Similarly, in the second paragraph groundwater is said to be retained as a CERCLA medium of concern for Zone 1, 4, and 7 even though there was no human health or environmental risk identified in the risk assessment based on potential migration to surface water concerns (*i.e.,* state criteria).

Response:

(a) Disagree. See Response to GC1.

(b) Disagree. See Response to GC1.

EPA 10/7/10 Rebuttal:

DP24 - (a) See previous EPA response.

DP25 - (b) See previous EPA response.

Response to Rebuttal:

(a) See Response to Rebuttal for GC1.

(b) See Response to Rebuttal for GC1.

SC35: p. 2-2, §2.2

In the fourth sentence replace "formal" with "CERCLA" and in the fifth sentence remove "informal" and add at the end of the sentence: "in accordance with State standards."

Response: Agree. These corrections will be made.

SC36: p. 2-3, ¶6

Insert "hypothetical future residents and" after "Prevent exposure of…"

Response: Disagree. See Response to SC5. The current text is identical to the January 2010 version of the FS. The RAO is accurate.

EPA 10/7/10 Rebuttal: DP26 – See previous EPA response.

Response to Rebuttal: Agree. See Response to Rebuttal for SC5.

SC37: p. 2-4, ¶2

In the third sentence replace "informal" with "State-compliant."

Response: Agree. This correction will be made.

SC38: p. 2-4, ¶3

Should "hypothetical future residents and" be inserted after "Prevent…"?

Response: Disagree. See Response to SC5. The current text is identical to the January 2010 version of the FS. The RAO is accurate.

EPA 10/7/10 Rebuttal: DP27 - See previous EPA response.

Response to Rebuttal: Agree. See Response to Rebuttal for SC7.

SC39: p. 2-6, §2.2.3.1

The new text added as the second last paragraph states that ARARs and TBCs are not defined for non-CERCLA regulated contamination (including LNAPL). This is in accordance with our agreement for dealing with non-CERCLA contamination. However, in Section 2.2.3.2, page 2-9, titled *Chemical-Specific ARARs and TBCs,* Section 22a-133k-2(f) and addresses LNAPL, is discussed. This discussion should be in a separate section for non-CERCLA state regulatory criteria.

Response: Agree with clarification. The references to LNAPL will be deleted from the first four paragraphs in the "Federal" subsection of Section 2.2.3.1. (These should have been deleted in the July version of the FS.) However, the discussions in the "State" subsection sufficiently cover LNAPL, and no additional description is needed.

SC40: p. 2-13

Reinstate text about the CT Tidal Wetlands and Watercourses (only the freshwater wetlands regulations were supposed to be removed).

Response: Agree. The CT Tidal Wetlands and Watercourses discussion will be reinstated.

SC41: p. 2-15, ¶3

In the first sentence replace "ELUR" with "land use restriction."

> **Response:** Agree with clarification. The proposed text uses "land use restriction" which is not consistent the term "LUC" which is used in the rest of the document. Instead, the introductory clause of the subject sentence will be revised to the following:
>
> "If a LUC is in place in paved areas…"

SC42: p. 2-20, ¶2

In the first sentence remove "TPH."

> **Response:** Agree. This correction will be made.

SC43: p. 2-20, §2.2.5.2

In the first sentence under Zone 4, delete TPH.

> **Response:** Agree. This comment appears to be a duplicate of SC42. "TPH" only appears once on page 2-20.

SC44: p. 2-22, ¶2

Add at the end of the last sentence: "and meet risk-based standards under TSCA."

> **Response:** Agree. This correction will be made.

SC45: p. 2-26, ¶2

Add a new third sentence: "Also includes stormwater requirements for construction projects that disturb over one acre."

> **Response:** Agree. This correction will be made.

SC46: p. 2-26, ¶3

Replace the last sentence with: "These standards would be applicable to the evaluation of risk and implementation of remedial measures associated with PCB-contaminated sediment."

> **Response:** Agree. This correction will be made.

SC47: p. 2-27, ¶4

Delete this paragraph because TSCA was discussed on the previous page.

> **Response:** Agree. This correction will be made.

SC48: p. 2-27, ¶7

Add a last sentence: "Contaminated media will be tested before disposal to determine if it meets hazardous waste criteria."

> **Response:** Agree. This correction will be made.

SC49: p. 2-28, ¶1

Add a last sentence: "Any contaminated media that, after testing, is determined to meet hazardous waste criteria will be managed in compliance with these standards."

Response: Agree. This correction will be made.

SC50: p. 2-28, ¶2

In the second sentence remove "permitting, operator certification."

Response: Disagree. These items are covered in this set of regulations. No change will be made.

EPA 10/7/10 Rebuttal: DP28 - Remove this text since standards for permitting and operator certification are administrative regulatory standards that aren't substantive ARARs (so aren't discussed in this section which is limited to discussing ARARs.

Response to Rebuttal: Agree. The requested text change will be made.

SC51: p. 2-28, ¶3

In the last sentence change "and for monitor" to "and for monitoring."

Response: Agree. This correction will be made.

SC52: Table 2-1, p. 2

Add to the Remediation Regulations, Action to be Taken text: "Any cover system over contamination being left in place will be established, monitored and maintained in compliance with these standards."

State Remediation standards for LNAPL are not ARARs.

Response:

(a) Agree. The requested change will be made.

(b) Agree. The citation that refers to the LNAPL will be deleted.

SC53: Table 2-1, p. 3

State Water Quality Standards are action-specific, not chemical-specific ARARs.

Response: Disagree. As per the Response to SCA 68 in the final (June 11, 2010) RTC document, it was agreed to leave the WQS in the chemical-specific category. They were used to develop alternative Surface Water Protection Criteria (SWPC) which were subsequently were used as PRGs.

EPA 10/7/10 Rebuttal: DP29 **-** The alternatives do not propose to treat surface waters to meet the standard so they aren't chemical-specific standards. They are action-specific because they are being used to monitor surface water to identify is contamination is migrating from the Site.

Response to Rebuttal: Agree with clarification. Connecticut WQSs are currently included in both chemical-specific (Table 2-1) and action-specific (Table 2-5) ARAR tables. The WQSs were used in the development of groundwater criteria (SWPC) which are considered PRGs; however, to address EPA's comment the WQSs will only be retained as action-specific ARARs. WQSs will be deleted from Table 2-1 and other chemical-specific ARAR tables in Section 4.

SC54: Table 2-2

List each ARARs' Status as "Applicable" not "Potentially Applicable."

Response: Agree. These corrections will be made.

SC55: Table 2-5, p. 1

Change the TSCA, Evaluation/Action to be Taken text to: "These standards would be applicable to the evaluation of risk and implementation of remedial measures associated with PCB-contaminated sediment. The Navy will seek public comment in the Proposed Plan about the finding that the proposed remedy for PCB contamination at the Site will not pose an unreasonable risk of injury to health or the environment. An EPA finding that the remedy meets these standards will be included in the Record of Decision."

Response: Agree. This correction will be made.

SC56: Table 2-5, p. 4

Remove the "Release Response and Corrective Action for UST Systems Containing Petroleum or Hazardous Substances" since these are standards for LNAPL.

Remove the Hazardous Waste Facility Siting and Solid Waste ARAR because any cover system used at the Site for soil will be regulated under the CT Remediation Regulations and sediment will be capped under EPA Sediment Guidance standards.

Response:

(a) Agree. But, the Release Response regulation information was added per Response to comment SCA 75a of the March 2010 comments.

(b) Disagree. The Hazardous Waste Facility Siting information was moved here per the Response to SCA 75b in the final (June 11, 2010) RTC document. The Solid Waste regulation was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. Therefore, no change will be made.

EPA 10/7/10 Rebuttal:

DP30 - (a) The regulation could be cited if CERCLA contamination about risk levels was co-mingled with the LNAPL. Since, based on this version of the FS, that is not the case, then there are no ARARs for the LNAPL.

DP31 - (b) These statutes should not be cited because they aren't being used as the standards for the cover (the CT Remediation Standards are). If the Navy wants to change which regulations will apply to the design, construction, and long-term maintenance/monitoring of the cover system then either the hazardous waste or solid waste standard could be considered.

Response to Rebuttal:

(a) Agree. The subject text will be removed from Table 2-5.

(b) Agree. The subject text will be removed from Table 2-5.

SC57: Table 2-1

The inclusion of the citation for LNAPL, 22a-449(d)-106(f) is not consistent with the text on page 2-6, Section 2.2.3.1 that identifies LNAPL as a non-CERCLA contaminant. There are no ARARs for LNAPL, just state criteria.

> **Response:** This comment appears to be a duplicate of SC52, Comment (b). See Response to SC52.

SC58: Table 2-3

The units listed for groundwater PRGs should be changed to micrograms per liter.

> **Response:** Agree. This correction will be made.

SC59: Figures 2-1, 2-3, & 2-7

The Legend identifies the green dots as "No PMC Exceedances." The Navy said they would be identified as "No COC Exceedances." Other figures use the "No COC Exceedances" identifier for green dots. Please correct.

> **Response:** Agree. The Legend on Figures 2-1, 2-3, and 2-7 will be changed to identify the green dots as "No COC Exceedances".

SC60: Figure 2-9

Please correct the Legend to identify DEC Industrial/Commercial Exceedances, not Residential Exceedances.

> **Response:** Agree. The Legend in Figure 2-9 will be corrected to identify the white tag as a DEC Industrial/Commercial Exceedance.

SC61: Figure 2-21

The color coding in the Legend for the dots was not used. There are no pink or green dots.

> **Response:** Agree. Pink and green color coding of dots shown in the Legend was not used on the figure. Pink and green dots and boxes will be deleted from the Legend and yellow dots will be identified as Sediment Sample Locations.

SC62: p. 3-26, last ¶

Add a new last sentence: "In the event of property transfer and with confirmation that contaminated media remains at the sites, an environmental land use restriction (ELUR) pursuant to state law would be recorded to limit the use of media."

> **Response:** Agree. This correction will be made.

SC63: p. 3-49, §3.8.2.1

Modify this section in accordance with the comment made on page ES-13: "As long as access to the capped area is controlled by the Navy, LUCs would be implemented as part of NSB-NLON's Standard Operating Procedures Administration (SOPA) Instruction 5090.25, in coordination with the State, which owns the subtidal area. If the adjacent shoreline property is transferred so that the Navy no longer controls access to the capped area, the LUCs would be converted into land use restrictions, which would comply with State standards. Monitoring of compliance with LUCs will occur at least yearly."

Response: Agree with clarification. The subject sentence will be replaced with the following:

"As long as the property is owned by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC RD that will be prepared by the Navy as the LUC component of the remedy. If the property is transferred out of federal ownership, the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

EPA 10/7/10 Rebuttal: DP (not numbered) – The EPA requested that the text be changed to the following: "As long as access to the capped area is controlled by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC RD that will be prepared by the Navy as the LUC component of the remedy, in coordination with the State, which owns the subtidal area. If the adjacent shoreline property is transferred so that the Navy no longer controls access to the capped area, the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

Response to Rebuttal: Agree with clarification. The text will be changed as follows:

"As long as access to the capped area is controlled by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC RD that will be prepared by the Navy as the LUC component of the remedy, in coordination with the State, which owns the subtidal area. If the adjacent shoreline property is transferred so that the Federal government no longer controls access to the capped area, the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

Additional comment: Given the proposed text revision, the text should also discuss how LUCs would be maintained in the event of a transfer from the Navy to another federal agency.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC9.

SC64: p. 4-7, ¶4

In the first sentence remove "and location-."

Response: Agree. This correction will be made.

SC65: p. 4-7, §4.2.1.1

Replace the paragraph with: "No Action would not include any action under CERCLA and any existing administrative or engineering environmental controls would not be an enforceable part of a CERCLA remedy. This alternative is required under CERCLA to establish a basis for comparison with other alternatives. The only activity under this alternative would be the performance of five-year reviews. This alternative cannot be chosen because waste remains on site."

Response: Agree. This correction will be made with the exception of the word "waste" which will be replaced with "contamination."

SC66: p. 4-8, ¶2

Remove the second and third sentences.

Response: Disagree. The second sentence was revised per the Response to SCA 20 in the final (June 11, 2010) RTC document by changing "attenuation" to "processes". The text was not otherwise an issue and was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is nearly identical to the text included in the

January 2010 version of the FS. Regarding the third sentence, the "Reduction" criterion includes a discussion of residuals. Therefore, no changes will be made.

EPA 10/7/10 Rebuttal: DP32 - The only relevant analysis under this criterion is whether there is active treatment. So remove the second and third sentences because they don't pertain to the criterion.

Response to Rebuttal: Agree. The sentences will be deleted.

SC67: p. 4-10, ¶3

In the first sentence, remove "(pending CTDEP approval of the adequacy of the engineering controls)."

Response: Disagree. This text was included because CTDEP has yet to provide approval on the approach.

EPA 10/7/10 Rebuttal: DP33 - The text was removed because under CERCLA the State doesn't approve the selection of remedial standards, they are consulted as to how the State interprets its regulations.

Response to Rebuttal: Agree with clarification. The New London team agreed that CTDEP should provide concurrence on the adequacy of the Engineered Controls prior to proceeding with selection of soil remedial alternatives. Additional information was collected during the Soil PDI to evaluate the adequacy of the controls. This information will be incorporated into the Soil PDI Completion Report. The text will be changed to indicate "concurrence" instead of "approval" regarding the adequacy of the engineering controls.

SC68: p. 4-11, ¶1

Remove the second and third sentences.

Response: Disagree. The second sentence was revised per the Response to SCA 20 in the final (June 11, 2010) RTC document by changing "attenuation" to "processes". The text was not otherwise an issue and was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is nearly identical to the text included in the January 2010 version of the FS. Regarding the third sentence, the "Reduction" criterion includes a discussion of residuals. Therefore, no changes will be made.

EPA 10/7/10 Rebuttal: DP34 - The only relevant analysis under this criterion is whether there is active treatment. So remove the second and third sentences because they don't pertain to the criterion.

Response to Rebuttal: Agree. The sentences will be removed.

SC69: p. 4-11, ¶3

In the third sentence, remove "(pending CTDEP approval of the adequacy of the engineering controls)."

Remove the last sentence.

Response:

(First Comment) Disagree. This text was included because CTDEP has yet to provide approval on the approach.

(Second Comment) Disagree. The sentence was revised per the Response to SCA 20 in the final (June 11, 2010) RTC document by changing "attenuation" to "processes". The text was not

otherwise an issue and was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is nearly identical to the text included in the January 2010 version of the FS. Therefore, no change will be made.

EPA 10/7/10 Rebuttal:

DP35 – First Comment - The text was removed because under CERCLA the State doesn't approve the selection of remedial standards, they are consulted as to how the State interprets its regulations.

DP36 – Second Comment - This is not a natural attenuation alternative and there is no documentation in the record as to whether cleanup standards will ever be met by "natural processes."

Response to Rebuttal:

First Comment – Agree with clarification. See Response to Rebuttal for SC67.

Second Comment – Agree. The sentence will be removed.

SC70: p. 4-11, ¶5

Discuss the implementability of getting a deed restriction if the property were transferred from Navy control.

Response: Disagree. The current text is identical to the January 2010 version of the FS and a change was not required per the final (June 11, 2010) RTC document. Considering that New London is an active base, property transfer is unlikely in the foreseeable future. Procedures related to property transfer will be detailed in the LUC RD. Therefore, no changes will be made.

Revised Response: Agree. The implementability of getting a deed restriction will be discussed by adding the following: "Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws."

Additional comment: Given the proposed text revision, the text should also discuss any implementability issues with maintaining LUCs in the event of a transfer from the Navy to another federal agency.

Response to Additional Comment: The subject replacement text will be revised as follows:

"Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws. If the property is transferred to another federal agency, Navy would ensure the federal agency taking over the property was formally made aware of the (1) environmental status of the installation, to include all LUCs, and (2) the requirement imposed in the ROD and described in the LUC RD to keep such LUCs in place until such time as they are no longer required."

SC71: p. 4-14, ¶5

In the first sentence, remove "(pending CTDEP approval of the adequacy of the engineering controls)."

Response: Disagree. This text was included because CTDEP has yet to provide approval on the approach.

EPA 10/7/10 Rebuttal: DP37 - The text was removed because under CERCLA the State doesn't approve the selection of remedial standards, they are consulted as to how the State interprets its regulations.

Response to Rebuttal: Agree with clarification. See Response to Rebuttal for SC67.

SC72: p. 4-15, ¶4

In the fourth sentence, remove "(pending CTDEP approval of the adequacy of the engineering controls)."

Response: Disagree. This text was included because CTDEP has yet to provide approval on the approach.

EPA 10/7/10 Rebuttal: DP38 - The text was removed because under CERCLA the State doesn't approve the selection of remedial standards, they are consulted as to how the State interprets its regulations.

Response to Rebuttal: Agree with clarification. See Response to Rebuttal for SC67.

SC73: p. 4-16, ¶2

In this paragraph also discuss the implementability of getting a deed restriction if the property were transferred from Navy control.

Response: Disagree. The current text is identical to the January 2010 version of the FS and a change was not required per the final (June 11, 2010) RTC document. Considering that New London is an active base, property transfer is unlikely in the foreseeable future. Procedures related to property transfer will be detailed in the LUC RD. Therefore, no changes will be made.

Revised Response: Agree. The implementability of getting a deed restriction will be discussed by adding the following: "Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws."

Additional comment: Given the proposed text revision, the text should also discuss any implementability issues with maintaining LUCs in the event of a transfer from the Navy to another federal agency.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC70.

SC74: p. 4-19, ¶3

In the first sentence, remove "(pending CTDEP approval of the adequacy of the engineering controls)."

Response: Disagree. This text was included because CTDEP has yet to provide approval on the approach.

EPA 10/7/10 Rebuttal: DP39 **-** The text was removed because under CERCLA the State doesn't approve the selection of remedial standards, they are consulted as to how the State interprets its regulations.

Response to Rebuttal: Agree with clarification. See Response to Rebuttal for SC67.

SC75: p. 4-19, ¶5

Remove the second and third paragraph.

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is essentially the same as the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP40 **-** The only relevant analysis under this criterion is whether there is active treatment. So remove the second and third sentences because they don't pertain to the criterion.

Response to Rebuttal: Agree. The second and third sentences will be deleted.

SC76: p. 4-20, ¶2

In the fourth sentence, remove "(pending CTDEP approval of the adequacy of the engineering controls)."

Response: Disagree. This text was included because CTDEP has yet to provide approval on the approach.

EPA 10/7/10 Rebuttal: DP41 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Agree with clarification. See Response to Rebuttal for SC67.

SC77: p. 4-21, ¶1

Discuss the implementability of getting a deed restriction if the property were transferred from Navy control.

Response: Disagree. The current text is identical to the January 2010 version and a change was not required per the final (June 11, 2010) RTC document. Considering that New London is an active base, property transfer is unlikely in the foreseeable future. Procedures related to property transfer will be detailed in the LUC RD. Therefore, no changes will be made.

Revised Response: Agree. The implementability of getting a deed restriction will be discussed by adding the following: "Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws."

Additional comment: Given the proposed text revision, the text should also discuss any implementability issues with maintaining LUCs in the event of a transfer from the Navy to another federal agency.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC70.

SC78: p. 4-22, ¶4

Remove this paragraph since LNAPL is addressed in section 4.13.

Response: Disagree. The LNAPL can be addressed either by this soil alternative or by an LN alternative. If an LN alternative was implemented first, then the subject portion of this excavation alternative would not apply. On the other hand, if the excavation was implemented first, then the LN alternative would not be needed.

EPA 10/7/10 Rebuttal: DP42 - Note that since LNAPL does not contain CERCLA contaminants the actions to address LNAPL are not evaluated under the NCP criteria.

Response to Rebuttal: Disagree. Neither of the alternatives in Section 4.13 include excavation as a technology to remove LNAPL. The LNAPL encountered during implementation of Alternative S.1.5 must be identified and managed appropriately. If Alternative S.1.5 is completed, there would be no need to conduct other LNAPL alternatives included in Section 4.13. Therefore, it is appropriate to include this paragraph.

Additional comment: As discussed between EPA and the Navy if the excavation of LNAPL contaminated soil is comingled with the soil contaminated with CERCLA contaminants, then the entire operation can be analyzed under the NCP criterion as long as there are no additional costs/volumes/procedures needed to address the LNAPL contaminated soil. If the LNAPL contaminated soil can be segregated from the CERCLA contaminated soil, then the costs/volumes/procedures associated with address the LNAPL contaminated soil should not be included in the NCP analysis.

Response to Additional Comment: As described in the FS, the LNAPL is within the volume of soil to be excavated as part of Alternative S-1.5. Removal of the LNAPL will be coincidental and unavoidable, and the LNAPL would be removed and disposed of separately. The text will be revised to show the capital cost, net present worth of the O&M costs, and net present worth for the alternative that excludes the LNAPL component and another set of costs that includes the LNAPL component. Therefore, the CERCLA costs will be presented separately from the non-CERCLA costs.

SC79: p. 4-24, ¶5

Remove this paragraph since LNAPL is addressed in section 4.13.

Response: Disagree. The LNAPL can be addressed either by this soil alternative or by an LN alternative. If an LN alternative was implemented first, then the subject portion of this excavation alternative would not apply. On the other hand, if the excavation was implemented first, then the LN alternative would not be needed.

EPA 10/7/10 Rebuttal: DP43 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Disagree. See Response to Rebuttal for SC78.

Additional Comment: See Additional Comment to SC78.

Response to Additional Comment: See the Response to Additional Comment for SC78.

SC80: p. 4-26, ¶3

Replace this paragraph with: "Alternative S-1.5 would not address CERCLA risks by reducing the toxicity, mobility, and volume of PAHs, lead, and mercury in soil through treatment, except through the treatment of water generated from the dewatering process prior to discharge to the Thames River."

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is essentially the same as the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP44 **-** See previous EPA comments concerning what can be evaluated under the Treatment criterion and retain EPA's language.

Response to Rebuttal: Agree. The paragraph will be replaced with the suggested sentence.

SC81: p. 4-26, ¶4

Remove the paragraph (can be discussed in Section 4.13).

Response: Disagree. The LNAPL can be addressed either by this soil alternative or by an LN alternative. If an LN alternative was implemented first, then the subject portion of this excavation alternative would not apply. On the other hand, if the excavation was implemented first, then the LN alternative would not be needed.

EPA 10/7/10 Rebuttal: DP45 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Disagree. See Response to Rebuttal for SC78.

Additional Comment: See Additional Comment for SC78.

Response to Additional Comment: See the Response to Additional Comment for SC78.

SC82: p. 4-27, ¶4

Replace "NPDES permit" with "federal and State water discharge regulations."

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. The current text conveys essentially the same information as the proposed text. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP46 - There is no NPDES permit for a CERCLA remedy so use the proper terminology that identifies the waster discharge regulations rather than the permit.

Response to Rebuttal: Agree. The requested text change will be made.

SC83: p. 4-28, ¶1

Remove "and incineration of LNAPL" (can be discussed in Section 4.13). Remove the cost of treating the LNAPL off-site from the Alternative's cost estimate (should be CERCLA costs only).

Response:

(a) Disagree. The LNAPL can be addressed either by this soil alternative or by an LN alternative. If an LN alternative was implemented first, then the subject portion of this excavation alternative would not apply. On the other hand, if the excavation was implemented first, then the LN alternative would not be needed.

(b) Disagree. As with other off-site treatment costs in the other alternatives (per the response to comment SCA 8 of the final (June 11, 2010) RTC document), the cost of the LNAPL treatment immediately follows the cost tabulation on page 4-28. The cost estimates for each alternative will not be changed. However, the FS reader can subtract the LNAPL cost component from the capital cost for the alternative.

EPA 10/7/10 Rebuttal:

DP47 - (a) Any actions to address LNAPL are not included in the NCP criteria evaluation, since it is no CERCLA contamination.

DP48 - (b) The cost is only the cost of implementing the CERCLA components of the remedy. Since

the LNAPL is not a CERCLA waste its treatment is not to be included in the CERCLA cost calculation (it can be mentioned as a non-CERCLA cost).

Response to Rebuttal:

(a) Disagree. See Response to Rebuttal to SC78.

Additional Comment: See Additional Comment to SC78.

Response to Additional Comment: See the Response to Additional Comment for SC78.

(b) Disagree. Because the LNAPL will be addressed by the alternative, inclusion of the costs associated with its treatment are appropriate. Exclusion of the costs would bias any cost comparisons.

Additional Comment: See Additional Comment to SC78.

Response to Additional Comment: See the Response to Additional Comment for SC78.

Make the changes from the Zone 1 Alternatives text (§ 4.2), noted above, to the text describing the alternatives for all of the other Zones with CERCLA soil contamination.

Comments that pertain to the capping alternative for Zone 2 apply to every other zone where a capping alternative is presented.

Response: Revisions to other alternatives will be made as needed pending the resolution of the responses to the comments.

EPA 10/7/10 Rebuttal: DP49 - See previous EPA comments about these matters above.

Response to Rebuttal: Rebuttal noted. Appropriate changes will be made to other alternatives.

SC84: p. 4-28, §4.3

a) Please supplement the first sentence for the Zone 2 discussion to indicate that there is no CERCLA excess risk for Zone 2. Therefore, there are no CERCLA-required remedial alternatives. All of the alternatives presented for Zone 2 address only state cleanup standards.

b) For all discussion for Zone 2, delete all references to CERCLA requirements, NCP, PRGs, RAOs, ARARs, and TBCs.

Response:

(a) Disagree. See Response to GC1.

(b) Disagree. See Response to GC1.

EPA 10/7/10 Rebuttal:

DP50 - (a) See previous EPA comments about this matter above.

DP51 - (b) See previous EPA comments about this matter above.

KK7 - The response is not correct because a separate LNAPL cost component has not been provided to subtract. The cost component provided on page 4-28 includes both the treatment of highly contaminated soil and incineration of LNAPL as a single cost. Please clarify whether the cost refers to soil contaminated only with TPH (*i.e.,* thereby making the entire cost component non-

CERCLA).

Response to Rebuttal: (a) Disagree. See Response to Rebuttal for GC1.

(b) Disagree. See Response to Rebuttal for GC1.

KK7 - See Response to Rebuttal for SC83(b).

Additional Comment: See Additional Comment to SC78.

Response to Additional Comment: See the Response to Additional Comment for SC78.

SC85: p. 4-36, ¶4

In the first sentence remove "(pending CTDEP approval of the adequacy of the engineering controls)."

Response: Disagree. This text was included because CTDEP has yet to provide approval on the approach.

EPA 10/7/10 Rebuttal: DP52 **-** See previous EPA comments about this matter above.

Response to Rebuttal: See Response to Rebuttal for SC67.

SC86: p. 4-37, ¶1

Change the paragraph to: "Alternative S-2.3 would not address CERCLA risks by reducing the toxicity, mobility, and volume of lead in soil through treatment."

Remove the second paragraph.

Response:

(a) Disagree. Although the paragraph was revised based on the responses provided in the final (June 11, 2010) RTC document, the basic content of the paragraph is the same as the January 2010 version of the FS. The text is clear on what is treated and what is disposed. Therefore, no change will be made.

(b) Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is the same as the text included in the January 2010 version of the FS. The "Reduction" criterion includes a discussion of residuals. Therefore, no change will be made.

EPA 10/7/10 Rebuttal:

DP53 – (a) See previous EPA comments about this matter above.

DP54 – (b) See previous EPA comments about this matter above.

Response to Rebuttal:

(a) Agree. The first paragraph will be changed as requested.

(b) Agree. The second paragraph will be deleted.

SC87: p. 4-37, ¶4

In the fourth sentence, remove "(pending CTDEP approval of the adequacy of the engineering controls)."

Response: Disagree. This text was included because CTDEP has yet to provide approval on the approach.

EPA 10/7/10 Rebuttal: DP55 - See previous EPA comments about this matter above.

Response to Rebuttal: See Response to Rebuttal for SC67.

SC88: p. 4-38, ¶2

Discuss the implementability of getting a deed restriction if the property were transferred from Navy control.

Response: Disagree. The current text is identical to the January 2010 version and a change was not required per the final (June 11, 2010) RTC document. Considering that New London is an active base, property transfer is unlikely in the foreseeable future. Procedures related to property transfer will be detailed in the LUC RD. Therefore, no changes will be made.

Revised Response: Agree. The implementability of getting a deed restriction will be discussed by adding the following: "Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws."

Check to make sure that these changes don't need to be made elsewhere in the Section 4.

Response: Revisions to other alternatives will be made as needed pending the resolution of the responses to the comments.

EPA 10/7/10 Rebuttal: DP56 - See previous EPA comments about this matter above.

Response to Rebuttal: Comment noted. Changes will be made as appropriate to Section 4 per the final response to comment document.

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: [This Additional Comment appears to apply to SC88, above.] The subject replacement text will be revised per the Response to Additional Comment for SC70. (The response to SC77 is the same as that for SC70, so the earlier citation is noted in the Response to the Additional Comment.)

SC89: p. 4-38, ¶3

In the first sentence, remove "and TPH."

Response: Please clarify. Neither "and TPH" or "TPH" appear on page 4-38. ("TPH" appears on page 4-27 and next on page 4-48.) No change to be made.

Apply comments to all of the groundwater alternatives:

Response: Revisions to other alternatives will be made as needed pending the resolution of the responses to the comments.

SC90: p. 4-53, §4.4

a) Please supplement the first sentence of the Zone 3 discussion to indicate that there is no CERCLA excess risk for Zone 3. Therefore, there are no CERCLA-required remedial alternatives. All of the alternatives

presented for Zone 3 address only state cleanup standards.

b) For all discussion for Zone 3, delete all references to CERCLA requirements, NCP, RAOs, PRGs, ARARs, and TBCs.

Response:

(a) Disagree. See Response to GC1.

(b) Disagree. See Response to GC1.

EPA 10/7/10 Rebuttal:

DP57 - (a) See previous EPA comments about this matter above.

DP58 - (b) See previous EPA comments about this matter above.

Response to Rebuttal:

(a) Disagree. See Response to Rebuttal for GC1.

(b) Disagree. See Response to Rebuttal for GC1.

SC91: p. 4-83, §4.5.2.2

Please delete the last paragraph that refers to removing soil containing TPH. This alternative does not remove soil; it is a LUC and monitoring alternative.

Response: Agree. This correction will be made.

SC92: p. 4-109, §4.6

a) Please supplement the first sentence of the Zone 5 discussion to indicate that there is no CERCLA excess risk for Zone 5. Therefore, there are no CERCLA-required remedial alternatives. All of the alternatives presented for Zone 5 address only state cleanup standards.

b) For all discussion for Zone 5, delete all references to CERCLA requirements, NCP, RAOs, PRGs, ARARs, and TBCs.

Response:

(a) Disagree. See Response to GC1.

(b) Disagree. See Response to GC1.

EPA 10/7/10 Rebuttal:

DP59 **-** See previous EPA comments about this matter above.

DP60 - See previous EPA comments about this matter above.

Response to Rebuttal:

(a) Disagree. See Response to Rebuttal for GC1.

(b) Disagree. See Response to Rebuttal for GC1.

SC93: p. 4-124, §4.6.5.1

In the partial paragraph at the top of the page, please delete the reference to CERCLA risks because there are no excess risks for Zone 5. Make the same deletion on p. 4-127 in the second full paragraph.

Response:

(a) Disagree. See Response to GC1.

(b) Disagree. See Response to GC1.

EPA 10/7/10 Rebuttal:

DP61 - See previous EPA comments about this matter above.

DP62 - See previous EPA comments about this matter above.

Response to Rebuttal:

(a) Disagree. See Response to Rebuttal for GC1.

(b) Disagree. See Response to Rebuttal for GC1.

SC94: p. 4-129, §4.7

Please supplement the first sentence of the Zone 6 discussion to indicate that there is no CERCLA excess risk for Zone 6. Therefore, there are no CERCLA-required remedial alternatives. All of the alternatives presented for Zone 6 are intended to address only state cleanup standards. The text already deleted references to CERCLA requirements, RAOs, PRGs, ARARs, and TBCs.

Response: Agree with clarification. A sentence will be added to indicate that there are no CERCLA risks at the site and remediation addresses State Cleanup standards. However, new data may change this conclusion.

SC95: p. 4-174, §4.9.1.1

Replace this paragraph with: "No Action would not include any action under CERCLA and any existing administrative or engineering environmental controls would not be an enforceable part of a CERCLA remedy. This alternative is required under CERCLA to establish a basis for comparison with other alternatives. The only activity under this alternative would be the performance of five-year reviews. This alternative cannot be chosen because waste remains on site."

Response: Agree. This correction will be made with the exception of the word "waste" which will be replaced with "contamination."

SC96: p. 4-175, ¶5

Remove all but the first sentence of this paragraph.

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is essentially identical to the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. The "Reduction" criterion includes a discussion of residuals. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP63 - See previous EPA comments about this matter above.

Response to Rebuttal: Agree. Only the first sentence of the paragraph will be retained.

SC97: p. 4-177, ¶1

Replace the last sentence with: "It is estimated that monitored natural attenuation will achieve groundwater cleanup standards outside of the compliance boundary for the waste management area within the Zone in 219 years."

Response: Disagree. The current last sentence was added per RTC for SCA 116 in the final (June 11, 2010 RTC document. The information in the suggested text in the comment is already included in the "Short-Term Effectiveness" subsection. No changes are proposed.

EPA 10/7/10 Rebuttal: DP64 **-** Retain EPA's sentence. The only discussion of MNA that is relevant is how long it will take for MNA to achieve cleanup levels based on EPA guidance.

Response to Rebuttal: Agree with clarification. The points of groundwater contamination identified in the FS generally fall within the compliance boundary for the waste management area. The waste management areas for each zone are defined by the extent of soil contamination and these areas are identified on the appropriate Section 4 figures. The following sentence will be incorporated: "It is estimated that natural attenuation will achieve the cleanup standards within the compliance boundary of the Zone in 219 years.

SC98: p. 4-178, ¶2

Add a new second sentence: "However, if a soil alternative is chosen that leave contamination in place, long-term monitoring will be required to assess whether soil contamination is migrating to groundwater."

Response: Disagree. Where appropriate, groundwater monitoring is already included as a component in the soil alternatives. (Also, it is not clear where the suggested sentence is to be added.)

EPA 10/7/10 Rebuttal: DP65 - The point of the comment is that even if groundwater standards are eventually met, if the remedy includes leaving soil contamination exceeding CERCLA risk standards in place, then long-term groundwater monitoring will be required.

Response to Rebuttal: Comment noted. The current soil alternatives include groundwater monitoring components that address the comment. No changes are required to the referenced text which addresses groundwater alternatives.

SC99: p. 4-178, §4.9.2.2

The description of the protectiveness for this alternative (GW-1.2) was not edited as agreed in SCA23.

Response: Disagree with clarification. See the Response for SC19a.

EPA 10/7/10 Rebuttal:

DP66 **-** See previous EPA comments about this matter above.

KK8 - See EPA's rebuttal comment on SC19a.

Response to Rebuttal: See Response to Rebuttal for SC19a.

SC100: p. 4-179, ¶3

Change the paragraph to: "Alternative GW-1.2 would not reduce the toxicity, mobility, and volume of groundwater COCs or TPH through treatment."

Remove the second paragraph.

Response: (Both Comments) Disagree. The TPH was split from the CERCLA contaminants discussion, as generally requested in previous comments. In addition, the last two sentences of the subject paragraph were not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is essentially the same as the text included in the January 2010 version of the FS. The text is clear on what is treated. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP67 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Agree. The requested changes will be made.

SC101: p. 4-179, ¶6

In the first sentence, replace "upon implementation" with "upon achieving groundwater cleanup standards beyond the compliance boundary for the waste management area within the Zone."

Response: Disagree. In the Response to SCA 117 in the final (June 11, 2010) RTC document, it was agreed that the reference to the compliance boundary in the subject comment would be added to Groundwater RAO No. 2 and that the phrase "upon completion would still be retained in the subject text. No changes are proposed.

EPA 10/7/10 Rebuttal: DP68 **-** So the Navy's position is that the RAO is met as soon as the LUCs are implemented?

KK9 - The text discusses the time periods required to achieve PRGs but does not indicate whether the groundwater outside the compliance boundary exceeds the PRGs. Also, the compliance boundary has not been identified in the FS. If PRGs are currently exceeded outside the compliance boundary then the groundwater RAOs will not be achieved upon implementation. Please clarify.

Response to Rebuttal: Agree with clarification. See Responses to Rebuttals for GC1, SC19(a), and SC97.

SC102: p. 4-180, ¶3

Discuss the implementability of getting a deed restriction if the property were transferred from Navy control.

Response: Disagree. See the Response to SC70.

Revised Response: Agree. The implementability of getting a deed restriction will be discussed by adding the following: "Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws."

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC70. (The response to SC77 is the same as that for SC70, so the earlier citation is noted in the Response to the Additional Comment.)

SC103: p. 4-185, ¶2

Discuss the implementability of getting a deed restriction if the property were transferred from Navy control.

Response: Disagree. See the Response to SC70.

Revised Response: Agree. The implementability of getting a deed restriction will be discussed by adding the following: "Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws."

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC70. (The response to SC77 is the same as that for SC70, so the earlier citation is noted in the Response to the Additional Comment.)

SC104: p. 4-188, ¶3

Replace the three paragraphs in this section with: "Alternative GW-1.4 would not reduce the toxicity, mobility, and volume of groundwater COCs or TPH through treatment."

Response: Disagree. The TPH was split from the CERCLA contaminants discussion, as generally requested in previous comments. In addition, the content of the last two paragraphs of the subject section were not previously identified by EPA, and a change was not required per the final (June 11, 2010) RTC document. The current text is essentially the same as the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP69 **-** See previous EPA comments about this matter above.

Response to Rebuttal: The clarifying text will be removed and replaced with the requested sentence.

SC105: p. 4-189, ¶4

Revise the first three sentences to: "The administrative requirements of Alternative GW-1.4 would be significant [unclear why?]. The discharge and disposal of the untreated extracted groundwater to the Town of Groton POTW would have to be negotiated." In this paragraph also discuss the implementability of getting a deed restriction if the property were transferred from Navy control.

Response:

(a) Agree with clarification. The "significant requirements" refers to the Base permitting and POTW negotiations. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. However, the second sentence will be revised to refer NSB New London construction permits. A similar revision will be made for Alternatives GW-4.4 and GW-7.4.

(b) Disagree. See the Response to SC70.

EPA 10/7/10 Rebuttal: DP70 **-** There are no on-base permits for the CERCLA remedy. Regarding the POTW, the water to be discharged needs to meet pre-treatment standards, so it is unclear what 'negotiations" are needed. Neither of the issues cited should interfere with the implementation of the remedy.

Response to Rebuttal: Disagree with clarification. The facility has a dig permit procedure that must be completed for all intrusive activities and the subject alternative includes installation of a

groundwater extraction system. The substantive requirements of any permits required for this effort (construction within the Thames River floodplain) and the Navy's dig permit process would need to be met under CERCLA. Based on space limitations in the Lower Subase, locating and installing a groundwater extraction system could present significant implementability issues.

The current alternative assumes that the extracted groundwater would be directly discharged (no treatment) to the POTW. The Navy would need to negotiate with the POTW regarding the volume, treatment standards, and cost. Any of these issues could pose significant implementability issues for this alternative.

Additional Comment: Remove "significant," since as a qualitative term it is unclear whether the implementability issues are so great that the alternative could not be carried out or merely that there are additional implementability issues that may take more time and planning to address in comparison with the other alternatives.

Response to Additional Comment: Agree. The sentence "The administrative requirements of Alternative GW-1.4 would be significant." will be replaced with "The administrative requirements of Alternative GW-1.4 would be somewhat difficult."

Revised Response for (b): Agree. The implementability of getting a deed restriction will be discussed by adding the following: "Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws."

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC70. (The response to SC77 is the same as that for SC70, so the earlier citation is noted in the Response to the Additional Comment.)

SC106: p. 4-195, ¶2

Remove the third through fifth sentences.

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is essentially the same as the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. The "Reduction" criterion includes a discussion of residuals. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP71 **-** See previous EPA comments about this matter (what is relevant to the Treatment Criterion) above.

Response to Rebuttal: The subject text will be removed.

SC107: p. 4-196, ¶2

Revise the first three sentences to: "The administrative requirements of Alternative GW-1.4 would be significant. The substantive requirements of federal and State water discharge regulations would have to be met for discharge of treated groundwater to the Thames River." Discuss the implementability of getting a deed restriction if the property were transferred from Navy control.

Response: Agree with clarification. See the Response to SC105.

EPA 10/7/10 Rebuttal:

DP72 **-** See previous EPA comments about this matter above.

KK10 **-** For the second sentence, please clarify that the Base itself requires the permits, if that is the intent, because CERCLA only requires that the substantive requirements be met.

Response to Rebuttal: Agree with clarification. Alternative GW-1.5 versus Alternative GW-1.4 is discussed on p. 4-196. The alternative includes both construction and operation of the treatment facility within the Thames River floodplain and discharge of treated water to the Thames River. The substantive requirements of any permits required for this effort and the Navy's dig permit process would need to be met under CERCLA. The text will be revised appropriately.

Additional Comment: See Additional Comment to SC106.

Response to Additional Comment: [This Additional Comment appears to refer to SC105(a).] Agree. The sentence "The administrative requirements of Alternative GW-1.4 would be significant." will be replaced with "The administrative requirements of Alternative GW-1.4 would be somewhat difficult."

Revised Response (to last sentence of comment): Agree. The implementability of getting a deed restriction will be discussed by adding the following: "Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws."

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC70. (The response to SC77 is the same as that for SC70, so the earlier citation is noted in the Response to the Additional Comment.)

Apply to all sediment alternatives:

Response: Revisions to other alternatives will be made as needed pending the resolution of the responses to the comments.

SC108: p. 4-238, §4.12.1.1

Replace the paragraph with: "No Action would not include any action under CERCLA and any existing administrative or engineering environmental controls would not be an enforceable part of a CERCLA remedy. This alternative is required under CERCLA to establish a basis for comparison with other alternatives. The only activity under this alternative would be the performance of five-year reviews. This alternative cannot be chosen because waste remains on site."

Response: Agree. This correction will be made with the exception of the word "waste" which will be replaced with "contamination."

SC109: p. 4-238, ¶5

In the first sentence remove: "or location-."

Response: Agree. This correction will be made.

SC110: p. 4-243, ¶2

In the last sentence, change "transported to an off-site wastewater disposal facility" to "treated by an on-site treatment system before being discharged to the Thames River."

Response: Agree. This correction will be made.

SC111: p. 4-244, ¶6

Incorporate the comment made on page ES-13: "As long as access to the capped area is controlled by the Navy, LUCs would be implemented as part of NSB-NLON's Standard Operating Procedures Administration (SOPA) Instruction 5090.25, in coordination with the State, which owns the subtidal area. If the adjacent shoreline property is transferred so that the Navy no longer controls access to the capped area, the LUCs would be converted into land use restrictions, which would comply with State standards."

Response: Agree with clarification. The subject sentence will be replaced with "As long as the property is owned by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC RD that will be prepared by the Navy as the LUC component of the remedy. If the property is transferred out of federal ownership, the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

EPA 10/7/10 Rebuttal: DP (not numbered) – EPA requested that the text be changed to the following: "As long as access to the capped area is controlled by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC RD that will be prepared by the Navy as the LUC component of the remedy, in coordination with the State, which owns the subtidal area. If the property is transferred out of federal ownership, the LUCs would be converted into deed restrictions, which would comply with State recording standards. Monitoring of compliance with LUCs will occur at least yearly."

Response to Rebuttal: Agree. The requested text change will be made.

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: The subject replacement text will be revised as follows:

"As long as access to the capped area is controlled by the Navy, these LUCs would be implemented in accordance with a post-ROD LUC RD that will be prepared by the Navy as the LUC component of the remedy, in coordination with the State, which owns the subtidal area. If the property is transferred out of federal ownership, the LUCs would be converted into deed restrictions, which would comply with State recording standards. If the property is transferred to another federal agency, the Navy would ensure the federal agency taking over the property was formally made aware of the (1) environmental status of the installation, to include all LUCs, and (2) the requirement imposed in the ROD and described in the LUC RD to keep such LUCs in place until such time as they are no longer required. Monitoring of compliance with LUCs will occur at least yearly."

SC112: p. 4-245, ¶4

At the end of the fourth sentence add: "or any other human disturbance."

Response: Agree. This correction will be made.

SC113: p. 4-246, ¶2

Replace the entire paragraph with: "Although the dredging and capping components of Alternative SD-3 will not reduce toxicity, mobility, and volume of contaminants through treatment, the treatment of the COCs

contained in sediment dewatering fluid through on-site treatment with liquid-phase GAC adsorption will partially meet this criterion. An estimated 246,000 gallons of contaminated dewatering fluid would be treated in this manner before discharge to the Thames River."

Response: Agree with clarification. The proposed text will be used to replace only the first three sentences of the subject paragraph. The balance of the current paragraph will be retained, consistent with similar discussions of this criterion elsewhere in the FS. This latter issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. Although there were changes made to the text, the content of the current text is very similar to the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed.

EPA 10/7/10 Rebuttal: DP73 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Agree. The requested text change will be made.

SC114: p. 4-246, ¶3

In the first sentence insert "physical" before "risks" and remove "from exposure to contaminated sediment." [the sediment doesn't pose a human health risk]

Response: Disagree. The subject section is Short-Term Effectiveness, which also considers remediation worker exposure. There may not be human health risk based on the HHRA and assumptions and exposure scenarios in the HHRA, but those scenarios may not be applicable to remediation exposure scenarios. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP74 **-** Unclear how the sediment could be contaminated enough to pose a risk to workers exposed to it for a short period of time, but no exceed CERCLA risk standards. Is this different then the Area A Wetland where the same comment was made and the Navy removed the reference to risks to workers from exposure to sediment contamination?

Response to Rebuttal: Disagree. The text is accurate. Exposure to contaminated sediment was not evaluated in the Human Health Risk Assessment. Potential risks associated with worker exposure to contaminated sediment would be further evaluated during development of the Health and Safety Plan for the project if it was selected and implemented.

SC115: p. 4-247, ¶3

Regarding the fourth sentence – why is dredging restricted from October to January? CERCLA remedies are not subject to permits and may operate throughout the year as long as they can be implemented to minimize impacts to aquatic resources.

Response: Disagree. Regardless of the reason for the restriction, whether by permit or regulation, the technical issues for the restriction must be followed. Dredging during different periods may be performed, but additional procedures would need to be developed and implemented. Because there is no immediate threat, this additional effort is not needed and the dredging can be performed during the normal time period.

This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP75 **-** Doe the Navy disagree the dredging does not need to be restricted to between October and January? There is no permit the applies to the CERCLA remedy and there is no regulation (ARAR) that creates an approved dredging period.

Response to Rebuttal: Agree with clarification. The subject sentence will be changed to indicate that it would be preferred by CTDEP if the dredging was performed in the October to January timeframe, but dredging can also be done during other times of the year if the appropriate procedures are followed.

SC116: p. 4-247, ¶4

In the second sentence replace "an NPDES permit" with "federal and State water discharge regulations." Regarding LUCs, discuss coordination with the State regarding implementing LUCs on state-owned subtidal lands and provisions that will need to be made to establish LUCs if the Navy transfers ownership of the adjacent shore-line property.

Response:

(a) Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. The existing text conveys essentially the same information as the proposed text. Therefore, no change will be made.

(b) Disagree. The current text is identical to the January 2010 version and a change was not required per the final (June 11, 2010) RTC document. Considering that New London is an active base, property transfer is unlikely in the foreseeable future. Procedures related to property transfer will be detailed in the LUC RD. Therefore, no changes will be made.

EPA 10/7/10 Rebuttal:

(a) DP76 - See previous EPA comments about this matter above.

(b) DP77 **-** The text needs to discuss the fact that the State, not the Navy owns the area to be restricted and the Navy only can control access to the restricted area by its ownership of the adjacent shoreline. To implement a restriction on the State property requires coordination with the State.

Response to Rebuttal:

(a) Agree. The text change will be made.

(b) Agree. Text similar to that included in the Rebuttal for SC111 will be incorporated into this section.

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC111.

SC117: p. 4-248, §4.12.3.1

Regarding Component 3 – Alternative SD-3 has on-site treatment and disposal, while SD-4 has off-site disposal. In the second sentence of the last paragraph, insert "off-site" before "wastewater treatment facility."

Response: Agree. This correction will be made.

SC118: p. 4-249, ¶4

At the end of the fifth sentence, add: "or any other human disturbance."

Response: Agree. This correction will be made.

SC119: p. 4-250, ¶2

End the paragraph after "through treatment" in the first sentence.

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is essentially the same as the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. The "Reduction" criterion includes a discussion of residuals. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP78 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Agree. The additional text will be deleted from the paragraph.

SC120: p. 4-250, ¶3

In the first sentence, remove "from exposure to contaminated sediment."

Response: Disagree. See Response to SC114. No changes are proposed.

EPA 10/7/10 Rebuttal: DP79 - See previous EPA comments about this matter above.

Response to Rebuttal: Disagree. See Response to Rebuttal for SC114.

SC121: p. 4-251, ¶1

Regarding the fourth sentence, see previous comment about dredging windows.

Response: Disagree. See Response to SC115. No changes are proposed.

EPA 10/7/10 Rebuttal: DP80 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Agree. See Response to Rebuttal for SC115. The sentence will be revised.

SC122: p. 4-251, ¶2

Regarding LUCs, discuss coordination with the State regarding implementing LUCs on state-owned subtidal lands and provisions that will need to be made to establish LUCs if the Navy transfers ownership of the adjacent shore-line property.

Response: Disagree. The current text is identical to the January 2010 version of the FS and a change was not required per the final (June 11, 2010) RTC document. Considering that New London is an active base, property transfer is unlikely in the foreseeable future. Procedures related to property transfer will be detailed in the LUC RD. Therefore, no changes will be made.

EPA 10/7/10 Rebuttal: DP81 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Agree. Text similar to that included in the Rebuttal for SC111 will be incorporated into this section.

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC111.

SC123: p. 4-253, ¶3

In the third sentence, replace "capping" with "backfill."

Response: Agree. This correction will be made.

SC124: p. 4-255, ¶6

Replace the paragraph with: "Although the dredging component of Alternative SD-6 will not reduce toxicity, mobility, and volume of contaminants through treatment, the treatment of the COCs contained in sediment dewatering fluid through on-site treatment with liquid-phase GAC adsorption will partially meet this criterion. An estimated 471,000 gallons of contaminated dewatering fluid would be treated in this manner before discharge to the Thames River."

Response: Disagree. See Response to SC113. No changes are proposed.

EPA 10/7/10 Rebuttal: DP82 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Agree. The paragraph will be replaced with the requested paragraph.

SC125: p. 4-256, ¶2

In the first sentence, insert "physical" before "risks" and remove "from exposure to contaminated sediment."

Response: Disagree. See Response to SC114. No changes are proposed.

EPA 10/7/10 Rebuttal: DP83 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Disagree. See Response to SC114.

SC126: p. 4-256, ¶5

Regarding the fourth sentence, see previous comment about dredging windows.

Response: Disagree. See Response to SC115. No changes are proposed.

EPA 10/7/10 Rebuttal: DP84 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Agree. See Response to Rebuttal for SC115. The sentence will be revised.

SC127: p. 4-257, ¶1

In the fourth sentence, replace "an NPDES permit" with "federal and State water discharge regulations."

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) final RTC document. The current text is identical to the text included in the January 2010 version of the FS. The existing text conveys essentially the same information as the proposed text. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP85 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Agree. The requested change will be made.

SC128: p. 4-257, ¶6

Change the first sentence to: "Off-site disposal of dewatered sediment and dewatering fluid would be

identical to that described for Component 4 of Alternative SD-3."

Response: Partially agree. The phrase "and dewatering fluid" will be added. The reference to SD-6 does not need to be changed.

EPA 10/7/10 Rebuttal: DP86 - SD-6 ha on-site disposal. Actually SD-4 has off-site disposal of both sediment and dewatering fluid which is comparable to SD-7.

Response to Rebuttal: Agree with clarification. Alternatives SD-6 and SD-7 both include dredging and off-site disposal of dewatered sediment and both include similar sediment volumes. The paragraph will be revised as follows:

"Off-site disposal of dewatered sediment would be identical to that described for Component 4 of Alternative SD-6.

Similar to Component 3 of SD-4, dewatering fluid would be characterized prior to disposal by collecting one sample for every 5,000 gallons to be disposed …"

SC129: p. 4-258, ¶6

Replace the paragraph with: "Alternative SD-7 does not reduce the toxicity, mobility, and volume of sediment COCs through treatment."

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The text is clear on what is treated and what is disposed. The current text is essentially the same as the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. The "Reduction" criterion includes a discussion of residuals. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP87 - See previous EPA comments about this matter above.

Response to Rebuttal: Agree. The requested change will be made.

SC130: p. 4-259, ¶1

In the first sentence, insert "physical" before "risks" and remove "from exposure to contaminated sediment."

Response: Disagree. See Response to SC114. No changes are proposed.

EPA 10/7/10 Rebuttal: DP88 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Disagree. See Response to Rebuttal for SC114.

SC131: p. 4-259, ¶4

Regarding the fourth sentence, see previous comment about dredging windows.

Response: Disagree. See Response to SC115. No changes are proposed.

EPA 10/7/10 Rebuttal: DP89 - See previous EPA comments about this matter above.

Response to Rebuttal: Agree. See Response to Rebuttal for SC115.

SC132: Tables §4

Please edit the ARARs tables as necessary to address other comments and for compliance with the previous comment resolution agreements.

Response:

(a) Agree. Revisions to the ARAR tables will be made as needed pending the resolution of the responses to the comments.

(b) The second part of this comment does not identify specific instances where previously agreed to comment resolutions were not followed. Please identify which comments need to be addressed.

EPA 10/7/10 Rebuttal: DP90 - See previous EPA comments about this matter above.

Response to Rebuttal: Rebuttal noted. Appropriate changes to the ARAR tables will be made as needed pending resolution of the responses to the rebuttals and comments.

SC133: Table 4-1, p. 1

In the second sentence under Cancer Slope and Guidelines for Carcinogen Risk Assessment, Evaluation, insert "carcinogenic" before "risks."

In the second sentence under Reference Dose, Evaluation, insert "non-carcinogenic" before "risks."

In the second sentence under the Early Life Exposure guidance, Evaluation, change "unacceptable risks" to "unacceptable carcinogenic risks to children."

Response: (All Comments) Agree. These corrections will be made.

SC134: Table 4-2, p. 2

In the second sentence under the Early Life Exposure guidance, Evaluation, add to the end of the sentence "to children."

Under CT Remediation Regulations, Evaluation, replace the last sentence with: "The cover system will established, monitored and maintained in compliance with these standards."

Response:

(a) Agree. This correction will be made.

(b) Agree. This correction will be made.

SC135: Table 4-3

For all of the listed ARARs, in the Evaluation text in addition to monitoring activities add "and establishment and long-term maintenance of the cover system."

Response: Agree. This correction will be made. In general, the phrase "monitoring activities" will be replaced with monitoring activities and establishment and long-term maintenance of the cover system."

SC136: Table 4-4

For all of the listed ARARs, in the Evaluation text in addition to monitoring activities add "and establishment and long-term maintenance of the cover system."

For Federal Action-specific ARARs add:

CWA, Section 402, National Pollution Discharge Elimination System (NPDES)	USC 1342; 40 CFR 122 through 125	Applicable	These standards govern point source discharges of pollutants to surface water. Includes stormwater requirements for construction projects that disturb over one acre.	The stormwater standards under these regulations will be met during any establishment or maintenance of the cover system.
Clean Air Act (CAA), National Emissions Standards for Hazardous Air Pollutants (NESHAPs)	42 USC §12(b)(1); 40 CFR Part 61	Applicable	The regulations establish emissions standards for 189 hazardous air pollutants. Standards set for dust control and other release sources.	Activities during the establishment or maintenance of the cover system that would generate dust and air pollutants would comply with these regulations.

Response:

(a) Agree. This correction will be made. In general, the phrase "monitoring activities" will be replaced with monitoring activities and establishment and long-term maintenance of the cover system."

(b) Disagree. This table applies to alternatives with LUCs and monitoring only and no active remediation, so the types of activities covered by the proposed ARARs are unlikely to occur. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP91 - Add these ARARs as they pertain to the establishment and maintenance of the covers over contaminated material, During maintenance operations that disturb the cover the applicable stormwater and air quality standards must be met.

Response to Rebuttal: Agree with clarification. The activities described in the proposed ARARs would not be required as part of initial implementation of the remedy, but may be necessary during Operation and Maintenance of the remedy. The requested ARARs will be incorporated into the table.

SC137: Table 4-7, p. 1

Under the NPDES, Status, remove "Potentially."

Add the CT Underground Injection Control Regulations from Table 2-5, p. 4.

Response:

(a) Agree. This correction will be made.

(b) Agree. Although this ARAR was not included in the January 2010 version of the FS, it appears that the regulation should be included as an ARAR for the subsurface in-situ activities. The change will be made.

SC138: Table 4-7, p. 2

For the Air and Water Pollution Control, Evaluation, remove the last sentence.

Response: Agree. This correction will be made.

SC139: Table 4-10, p. 1

For the two federal ARARs, Status, remove "Potentially."

Response: Agree. This correction will be made.

SC140: Table 4-10, p. 2

For the Air Control, Evaluation, remove the last sentence.

Response: Agree. This correction will be made.

SC141: Table 4-13, p. 1

Change the NPDES Synopsis to: "These standards govern point source discharges of pollutants to surface water. Includes stormwater requirements for construction projects that disturb over one acre."

Under Evaluation, add a new last sentence: "Remedial measures taken will meet the stormwater standards under these regulations."

For the CAA, Status, remove "Potentially." Under Action to be Taken, remove the last sentence.

Response: Agree. These corrections will be made.

SC142: Table 4-13, p. 2

Under CT Air Regulation, Evaluation, remove the last sentence.

Response: Agree. This correction will be made.

SC143: Table 4-14, p. 3

Under CT Remediation Regulations, Evaluation, add new third and fourth sentences: "The cap will constructed, monitored and maintained in compliance with these standards. Compliance with LUCs will also meet these standards."

Response: Agree. These corrections will be made.

SC144: Table 4-19, p. 2

Remove the last sentence under CT Air Regulation, Evaluation.

Response: Agree. This correction will be made.

SC145: Table 4-20, p. 2

In the first sentence under CT Remediation Regulations, Evaluation, remove "immediately" and remove the last sentence.

Response: Agree. These corrections will be made.

SC146: Table 4-21

Change all of the ARARs Evaluation text to "Would not comply." Natural Attenuation would not occur in a

reasonable enough period to meet any of these standards.

The Location-specific ARARs Table is missing. It should be the same ARARs as the groundwater monitoring requirements for the soil alternatives.

Response:

(a) Disagree. Although it is agreed that the long period of time for natural attenuation makes the alternative ineffective, the time element is not part of the evaluation of the compliance with ARARs criterion.

(b) Disagree. There was no Location-Specific ARAR table in the January 2010 version of the FS either. This table was excluded because there are no Location-Specific ARARs.

EPA 10/7/10 Rebuttal:

DP92 – (a) If the MNA does not meet EPA MNA standards identified in the guidance its not in compliance.

DP93 - (b) The entire area where the groundwater remedy will be implemented is in the Coastal Zone, so federal and State location-specific standards apply. Work may also be done in the 100-year flood zone for the River.

Response to Rebuttal:

(a) Agree. See the response to the rebuttal for SC19(a).

(b) Agree. Even though there are no CERCLA risks from groundwater, a location-specific ARAR table will be added to the FS for consistency.

Additional Comment: If the PDI shows that there is no CERCLA risk from groundwater the FS Amendment would not identify any groundwater ARARs.

Response to Additional Comment: Comment is acknowledged.

SC147: Table 4-22

Under Federal Natural Attenuation Guidance, Evaluation, the text should state "Would not comply" and identify how long MNA would take to achieve groundwater standards in each zone.

Need to add CT Water Quality Standards

Response:

(a) Agree. These corrections will be made.

(b**)** Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The CTDEP RSRs which cover groundwater quality criteria are already included in the Chemical-Specific ARAR Table (Table 4-21).

EPA 10/7/10 Rebuttal: DP94 **-** The water quality standards should be added as action-specific monitoring standards.

Response to Rebuttal: Agree. Although it is unlikely that they would be used during implementation of the alternative, the water quality standards will be added to the table.

SC148: Table 4-29, p. 3

In the first sentence under CT Remediation Regulations, Evaluation, remove "eventually."

Response: Agree. This correction will be made.

SC149: Table 4-30, p. 1

Add the Federal Fish and Wildlife Coordination Act and the CT Endangered Species Act since the Alternatives include discharges into the Thames River.

Response: Agree. These ARARs will be added to the Table 4-30.

SC150: Table 4-31, p. 2

Remove the last sentence under NPDES, Evaluation.

Response: Agree. This correction will be made.

SC151: Tables 4-32 & 4-33

Include any eco-risk guidances used to develop the alternatives in the Chemical-Specific ARARs tables.

Response: The following information will be added to Tables 4-32 and 4-33, respectively. A generalized version of this TBC will also be added to Table 2-1.

For Table 4-32:

Requirement	Citation	Status	Synopsis of Requirement	Evaluation of Alternative Compliance with ARAR
Effect Range Median-Quotient (ERM-Q)	Long, Edward, et al, 1995. Incidence of Adverse Biological Effects Within Ranges of Chemical Concentrations in Marine and Estuarine Sediments, and Long and Morgan, 1991. Potential for Biological Effects of Sediment-Sorbed Contaminants Tested in the National Status and Trends Program.	TBC	Provide guidance values for identifying potential risk to ecological receptors exposed to contaminated sediments. The citations provide the ER-M values which were then used in conjunction with site-specific toxicity test data to develop the PRGs.	Would not comply. The document would be used to develop standards used for evaluating risk to aquatic ecological receptors exposed to contaminated sediment. Guidance was used to establish sediment PRGs. The No Action alternative would not meet these standards because risks identified would not be addressed.

For Table 4-33:

Requirement	Citation	Status	Synopsis of Requirement	Evaluation of Alternative Compliance with ARAR
Effect Range Median-Quotient (ERM-Q)	Long, Edward, et al, 1995. Incidence of Adverse Biological Effects Within Ranges of Chemical Concentrations in Marine and Estuarine Sediments, and Long and Morgan, 1991. Potential for Biological Effects of Sediment-Sorbed Contaminants Tested in the National Status and Trends Program.	TBC	Provide guidance values for identifying potential risk to ecological receptors exposed to contaminated sediments. The citations provide the ER-M values which were then used in conjunction with site-specific toxicity test data to develop the PRGs.	Would comply. The document would be used to develop standards used for evaluating risk to aquatic ecological receptors exposed to contaminated sediment. Guidance was used to establish sediment PRGs. Alternatives SD-3, SD-4, SD-6, and SD-7 would meet the standards because potential risk to aquatic ecological receptors to contaminated sediment would be addressed through capping or dredging and off-site disposal of contaminated sediment.

SC152: Table 4-35, p. 1

Under TSCA, Synopsis, add a last sentence: "Written approval for the proposed risk-based clean up will be obtained from the Office of Site Remediation and Restoration, EPA Region 1.

Under Evaluation, add at the end of the text: "The Navy will seek public comment in the Proposed Plan as to whether the finding that the proposed remedy for PCB contamination at the Site will not pose an unreasonable risk of injury to health or the environment. An EPA finding that the remedy meets these standards will be included in the Record of Decision."

Response:

(a) Agree. This correction will be made.

(b) Agree. This correction will be made.

SC153: Table 4-35, p. 2

Remove the second sentence under Solid Waste, Synopsis. Remove the last sentence under Evaluation.

Response:

(a) Disagree. There is only one sentence in the Synopsis.

(b) Agree. This correction will be made.

EPA 10/7/10 Rebuttal: DP95 **-** Comment should have been in regards to "Status." The Solid Waste regulations are not the standards relevant to contamination left in place – instead it had been agreed that the CT Remediation Regulations would be the applicable ARAR.

Response to Rebuttal: Agree. The second sentence under Solid Waste, Status will be removed.

SC154: Figure 4-35

The depth of excavation specified in this figure and as required by the water elevations and as indicated on Figure 4-34 do not match. EPA does not request a change for the FS. Presumably the volumes used for the FS calculations are based on Figure 4-34 and these volumes will be revisited for the design.

Response: Agree with clarification. The information provided on Figure 4-34 was used to determined the volumes. Figure 4-35 is intended to provide a general cross section. The volumes will be revisited during the design. No change will be made to Figure 4-34.

SC155: Figure 4-39

Since this figure depicts dredging alternatives, please correct the title.

Response: Agree. The title for Figure 4-39 will be corrected to indicate that it is for a dredging alternative.

Section 5 – Apply Comments previously made to the Executive Summary section and Section 4.

Response: Other revisions will be made as needed pending the resolution of the responses to the comments.

EPA 10/7/10 Rebuttal: DP96 - See previous EPA comments about this matter above.

Response to Rebuttal: Rebuttal noted. Appropriate changes will be made to Section 5 that are consistent with the Executive Summary and Section 4.

SC156: p. 5-2, ¶4

In the second sentence, remove "(pending CTDEP approval of the adequacy of the engineering controls)."

Response: Disagree. This text was included because CTDEP has yet to provide approval on the approach.

EPA 10/7/10 Rebuttal: DP97 - See previous EPA comments about this matter above.

Response to Rebuttal: Agree with clarification. See Response to Rebuttal to SC67.

SC157: p. 5-3, ¶4&6

Remove the second sentence.

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. Although there were changes made to the text, the content of the current text is very similar to the text included in the January 2010 version of the FS. In the fourth paragraph, the text reflects a change per the final (June 11, 2010) RTC document (see SC18a). In sixth paragraph, the text is clear on what is treated and what is disposed. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP98 - See previous EPA comments about this matter above.

Response to Rebuttal: Agree. Information that does not describe specific treatment information will be removed from paragraphs 4 and 6.

SC158: p. 5-3, ¶7

Remove everything except the first sentence.

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. Although there were changes made to the text, the content of the current text is very similar to the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP99 - See previous EPA comments about this matter above.

Response to Rebuttal: Agree. Information that does not describe specific treatment information will be removed from paragraph 7.

SC159: p. 5-4, ¶5

Remove the fourth sentence. In the sixth sentence remove "(pending CTDEP approval of the adequacy of the engineering controls)."

Response:

(a) Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. Although there were changes made to the text, the content of the current text is very similar to the text included in the January 2010 version of the FS. The text reflects a change per the final (June 11, 2010) RTC document (see SC18a).

(b) Disagree. This text was included because CTDEP has yet to provide approval on the approach.

EPA 10/7/10 Rebuttal:

(a) DP100 - See previous EPA comments about this matter above.

(b) DP101 - See previous EPA comments about this matter above.

Response to Rebuttal:

(a) Agree. The sentence will be removed.

(b) Agree with clarification. See Response to Rebuttal to SC67.

SC160: p. 5-5, ¶3

In the third sentence, replace "an NPDES permit" with "federal and State water discharge regulations." In this paragraph, discuss the implementability of getting a deed restriction if the property were transferred from Navy control.

Response:

(a) Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. The existing text conveys essentially the same information as the proposed text. Therefore, no change will be made.

(b) Disagree. The current text is identical to the January 2010 version and a change was not required per the final (June 11, 2010) RTC document. Considering that New London is an active base, property transfer is unlikely in the foreseeable future. Procedures related to property transfer will be detailed in the LUC RD. Therefore, no changes will be made.

EPA 10/7/10 Rebuttal:

DP102 - (a) See previous EPA comments about this matter above.

DP103 - (b) See previous EPA comments about this matter above.

Response to Rebuttal:

(a) Agree. The text in sentence four will be replaced as requested.

(b) Disagree. See previous response and Response to SC70.

Revised Response for (b): Agree. The implementability of getting a deed restriction will be discussed by adding the following: "Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws."

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC70.

Make the previous Zone 2 text changes to all of the other soil Zone text sections.

Response: Other revisions will be made as needed pending the resolution of the responses to the comments.

SC161: p. 5-6, §5.1.7

The minor revisions made to the costs for the Zone 1 alternatives were not incorporated into the cost table.

Response: Agree. This correction will be made.

SC162: p. 5-39, §5.13.7

The minor revisions made to the capital costs for Alternatives S-7.4 and S-7.5 were not incorporated into the cost table.

Response: Agree. This correction will be made.

SC163: p. 5-40, ¶4

Change the first sentence to: "Alternative GW-1.2 would not be protective of human health and the environment since groundwater RAOs would not be met within an acceptable period of time."

Response: Disagree. See Response to SC19.

EPA 10/7/10 Rebuttal: DP104 - See previous EPA comments about this matter above.

Response to Rebuttal: Disagree. See Response to Rebuttal for SC19(a).

Additional Comment: See Additional Comment to SC19(a)

Response to Additional Comment: Agree. The above Response to Rebuttal should be "Agree. See Response to Rebuttal for SC19(a).

SC164: p. 5-41, ¶4

Change the first sentence to: "Alternative GW-1.2 would not comply with chemical-specific ARARs nor with Action-specific standards for Monitored Natural Attenuation remedies. Alternatives GW-1.3, GW-1.4, and GW-1.5 would comply with all ARARs and TBCs through remediation. For these alternatives once CERCLA

cleanup standards are met State standards for TPH would be achieved through natural attenuation."

Response: Disagree. See Response to SC 146. Although it is agreed that the long period of time for natural attenuation makes the alternative ineffective, the time element is not part of the evaluation of the compliance with ARARs criterion.

EPA 10/7/10 Rebuttal: DP105 - See previous EPA comments about this matter above.

Response to Rebuttal: Disagree. See Response to Rebuttal for SC19(a).

Additional Comment: See Additional Comment to SC19(a).

Response to Additional Comment: Agree. The above Response to Rebuttal should be "Agree. See Response to Rebuttal for SC19(a).

SC165: p. 5-41, ¶5

In the first sentence, insert "location-," before "and."

Response: Agree. This correction will be made.

SC166: p. 5-42, ¶¶3&4

Retain only the first sentence of each of these paragraphs.

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. Although there were changes made to the text, the content of the current text is very similar to the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP106 - See previous EPA comments about this matter above.

Response to Rebuttal: Agree. The requested text will be deleted.

SC167: p. 5-43, ¶2

Retain only the first paragraph.

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. Although there were changes made to the text, the content of the current text is very similar to the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP107 - See previous EPA comments about this matter above.

Response to Rebuttal: Agree. Text not relevant to treatment will be removed.

SC168: p. 5-45, ¶2

In the fourth sentence, replace "an NPDES permit" with "federal and State water discharge regulations." In this paragraph, discuss the implementability of getting a deed restriction if the property were transferred from Navy control.

Response:

(a) Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. The existing text conveys essentially the same information as the proposed text. Therefore, no change will be made.

(b) Disagree. The current text is identical to the January 2010 version and a change was not required per the final (June 11, 2010) RTC document. Considering that New London is an active base, property transfer is unlikely in the foreseeable future. Procedures related to property transfer will be detailed in the LUC RD. Therefore, no changes will be made.

EPA 10/7/10 Rebuttal:

(a) DP108 - See previous EPA comments about this matter above.

(b) DP109 - See previous EPA comments about this matter above.

Response to Rebuttal:

(a) Agree. The text in sentence four will be replaced as requested.

(b) Disagree. See previous response and Response to SC70.

Revised Response for (b): Agree. The implementability of getting a deed restriction will be discussed by adding the following: "Transfer of SUBASENLON to private, non-federal ownership is not anticipated in the near term or in future years. However, imposing a deed restriction to maintain LUCs if the property were transferred from federal ownership would not be difficult. As part of the property transfer process, a deed would be drawn up to include all necessary land control restrictions to be imposed on the new owner, and would be recorded in accordance with state laws."

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC70.

Apply the Zone 1 comments above to Zone 4 groundwater.

Response: Other revisions will be made as needed pending the resolution of the responses to the comments.

SC169: p. 5-57, ¶7

Change the text to: "Alternative SD-1 would not comply with chemical- specific ARARs and TBCs. No location- or action-specific ARARs or TBCs apply to this alternative."

Response: Agree. This correction will be made. This correction will also be made to the other no action alternative discussions in Sections 4.0 and 5.0.

SC170: p. 5-58, §5.31.4

Revise this section. The only alternatives that meet this criterion are those that include onsite treatment of dewatering fluid. Dredging, capping, off-site treatment and off-site disposal do not meet this criterion and should therefore not be discussed.

Response: Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. Although there were changes made to the

text, the content of the current text is very similar to the text included in the January 2010 version of the FS. The text is clear on what is treated and what is disposed. Therefore, no change will be made.

EPA 10/7/10 Rebuttal: DP110 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Agree. Information not relevant to treatment will be deleted.

SC171: p. 5-59, ¶4

Revise this paragraph since the sediment does not pose human health risks.

Response: Disagree. See Response to SC114.

EPA 10/7/10 Rebuttal: DP111 **-** See previous EPA comments about this matter above.

Response to Rebuttal: Disagree. See Response to Rebuttal for SC114.

SC172: p. 5-61, ¶2

In the third sentence, replace "an NPDES permit" with "federal and State water discharge regulations." Discuss the implementability of establishing LUCs on State-owned subtidal and the process for establishing LUC if the adjacent shoreline property were transferred from Navy control.

Response:

(a) Disagree. This issue was not previously identified by EPA and a change was not required per the final (June 11, 2010) RTC document. The current text is identical to the text included in the January 2010 version of the FS. The existing text conveys essentially the same information as the proposed text. Therefore, no change will be made.

(b) Disagree. The current text is identical to the January 2010 version and a change was not required per the final (June 11, 2010) RTC document. Considering that New London is an active base, property transfer is unlikely in the foreseeable future. Procedures related to property transfer will be detailed in the LUC RD. Therefore, no changes will be made.

EPA 10/7/10 Rebuttal: DP112 **-** See previous EPA comments about this matter above.

Response to Rebuttal:

(a) Agree. The text change will be made.

(c) Disagree. See previous response and Response to SC70.

Additional Comment: See Additional Comment to SC77.

Response to Additional Comment: The subject replacement text will be revised per the Response to Additional Comment for SC70.

SC173: Additional Comment in 11/10/10 Email

Also, please cite the federal wetland and floodplain regulations (by FEMA)

Requirement	Citation	Status	Synopsis of Requirement	Evaluation of Alternative Compliance with ARAR
Floodplain Management and Protection of wetlands	44 C.F.R. 9	Relevant and appropriate	FEMA regulations that set forth the policy, procedure and responsibilities to implement and enforce Executive Order 11988 Floodplain Management and Executive Order 11990, Protection of Wetlands.	Remedial alternatives conducted within the 500-year floodplain of the Thames River or within federal jurisdictional wetlands will be implemented in compliance with these standards. The Navy will solicit public comment as part of the proposed plan on the measures taken through the remedial action to protect floodplain and wetland resources.

Response to Additional Comment: The subject ARAR will be added.