



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER MANAGEMENT
PERMITTING, ENFORCEMENT & REMEDIATION DIVISION
FEDERAL REMEDIATION PROGRAM



October 7, 1996

Mr. Mark Evans
U.S. Department of the Navy
Northern Division, Naval Facilities Engineering Command, Code 1823
10 Industrial Way, Mail Stop 82
Lester, PA 19113-2090

Re: State Comments Regarding The *Draft Site Management Plan for Naval Submarine Base New London, Groton, Connecticut*

Dear Mr. Evans:

Staff of the Federal Remediation Program of the Permitting, Enforcement, and Remediation Division of the Bureau of Water Management have reviewed the "*Draft Site Management Plan for Naval Submarine Base New London, Groton, Connecticut*". This document was dated July 1996 and was received by the Department on July 15, 1996. It was prepared by Brown and Root Environmental on behalf of the Northern Division Naval Facilities Engineering Command.

General Comments

"No Further Action" is proposed for several sites, including the CBU Drum Storage Area, the Area A Wetland, the Overbank Disposal Area Northeast, the Spent Acid Storage and Disposal Area, and the Area A Weapons Center. We suggest that these recommendations be changed to reflect the agreements which were reached in the meeting on August 7 and 8 between the Navy, EPA and the State regarding the Phase II Remedial Investigation. The State agrees that the "No Further Action" recommendation is appropriate for the CBU Drum Storage Area. However, we suggest that "Limited Action" be recommended for the Area A Wetlands, and Area A Weapons Center. This reflects the consensus reached that although no further active remedial measures would be required at these sites, long term monitoring would be carried out and institutional controls would be put into place to prevent contact with or use of contaminated soils, sediments, or ground water. In addition, we agreed that further characterization would be required at the Overbank Disposal Area Northeast, and that further discussion was needed regarding the Spent Acid Storage and Disposal Area.

We are currently involved in discussions with the Navy and EPA regarding the applicability of the State's Remediation Standard Regulations at sites on the Submarine Base where Removal Actions or other interim measures have reduced risk to within EPA's acceptable range. It is the State's

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position that such sites should be remediated to meet the requirements of the Remediation Standard Regulations. This issue is currently most relevant to the Spent Acid Storage and Disposal Area. However, this issue may affect other sites which have not yet been identified.

The Relative Risk Evaluation Worksheets in Appendix B show the "top ten" contaminants for each medium at each site. For each contaminant a ratio between the maximum concentration of that contaminant and the "standard" for that substance is presented. The source of the standard is not stated. However, the various criteria of the State's Remediation Standard Regulations have not been considered. In many cases the standards selected are an order of magnitude or more larger than the appropriate State standard. In some cases, contaminants which exceed the State standards are not included on the list of the "Top 10" contaminants. In cases where the State standards are more stringent than Federal standards, the State standards should be used in calculating the ratios. In all cases the source of the Federal or State standard should be cited.

Specific Comments

Page 2-6 Section 2.1.8 Site 7 Torpedo Shops

The second paragraph states that TH-Dimer is jet rocket fuel. However, Section 2.1.20 on page on page 2-12 states that TH-Dimer is composed of kerosene. Please provide additional information regarding the composition of TH-Dimer. Is this material a kerosene- type jet fuel?

Page 2-38 Table 2-14 Summary of Findings- Site 15- Spent Acid Storage and Disposal Area

The plan states that "No Further Action" is recommended for the Spent Acid Storage and Disposal Area. The State recognizes that under CERCLA, no actionable risk remains at this site following excavation of lead contaminated soil under a Removal Action. However, as I indicated at a meeting between the Navy, EPA, and the State on August 7 and 8, and in my comment letter dated June 21, 1996 regarding the Phase 2 RI, as well as other letters, lead, benzo(a)anthracene, benzo(a)pyrene, and benzo(b)fluoranthene remain in soil at this site at concentrations in excess of the GB pollutant mobility criteria specified in the Remediation Standard Regulations. It is the State's position that this site should be remediated to meet the remaining requirements of the Remediation Standard Regulations.

Page 2-48 Table 2-22 Summary of Findings, Site 23- Fuel Farm

The meaning of the category "Tank Area Coordinator" is unclear.

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Page 6-1 Section 6.0 NSB-NLON Cleanup Team

Please correct our address to read as follows:

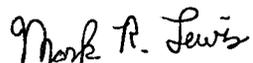
Mr. Mark Lewis
Connecticut Department of Environmental Protection
Water Management Bureau
Permitting, Enforcement, and Remediation Division
Federal Remediation Program
79 Elm St.
Hartford, CT 06106-5127

Appendix C, Page C-18

This chart is a schedule for work at the Spent Acid Storage and Disposal Area. It discusses deadlines for production of a No Further Action Decision Document for this Site. As noted above in my comments regarding Table 2-14, some additional analysis, hot spot excavation, or other remedial action may be required to meet the requirements of the State's Remediation Standard Regulations. For this reason, the State might be unable to concur with the issuance of a No Further Action Decision Document.

If you have any questions regarding this letter, please contact me at (860) 424-3768.

Sincerely,



Mark R. Lewis
Senior Environmental Analyst
Federal Remediation Program
Permitting, Enforcement & Remediation Division
Bureau of Water Management

cc: Ms. Kimberlee Keckler, US EPA New England, Federal Facilities Section
Mr. Andy Stackpole, NSBNL Environmental Department
Mr. Douglas Cervenak, Brown & Root Environmental