



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

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NSB NEW LONDON
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April 29, 1994

David Miu, RPM
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

RE: EPA's Comments on the Focused Feasibility Studies for DRMO, Area A Landfill, OBDA/Area A Downstream, and the Spent Acid Tank at the Naval Submarine Base - New London, Groton, Connecticut

Dear Mr. Miu:

The purpose of this letter is to transmit my preliminary comments on the subject documents and to request an extension to 31 May to provide you with additional comments.

Overall I found the approach for the remedial actions reasonable. The sediment removal at the OBDA is consistent with the recommendations we have made in the past. The hotspot removals at DRMO, Area A Landfill concrete pad and Spent Acid Tank with the capping of the remaining soils would be protective of the environment. The FFSS have taken into account the human health risks associated with the surface soils at the above sites and the capping alternatives would prevent any future exposure.

The impacts of the groundwater leaching contaminants left in the soil on the sediments have not been evaluated on the surrounding ecosystems for the DRMO yard and for the Area A Landfill.

As stated in the Phase I RI risk from surface water impact due to groundwater discharge, at the DRMO yard, is acceptable. However, it is possible that groundwater contaminants may build up along the groundwater/sediment interface. This question alone justifies the need for sediment sampling. The Thames River assessment should also discuss the cumulative impacts to the river from the Goss Cove Landfill, the Lower Subbase and the DRMO.

Every effort will be made to provide specific comments prior to May 31, 1994. If you have any questions regarding these comments, you should feel free to call me at (617). 573-5736.



J
Reels 5-11-94.

Sincerely,



Christine Williams, RPM
Federal Facilities Superfund Section

cc. Mark Leone, CT DEP
Andy Stockpole, NLNSB
Mary Sanderson, EPA
Patti Tyler, EPA