



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

January 4, 1995

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

Re: Federal Facilities Agreement Schedule for the Area A Landfill

Dear Mr. Evans:

Thank you for your letter dated December 30, 1994 requesting an extension of the deadlines set forth in the Federal Facilities Agreement ("FFA"). In your letter you express concern that our agreement to issue a revised draft feasibility study ("FS") in addition to a draft final FS has thwarted our mutual goal of a Record of Decision ("ROD") for the Area A landfill by the end of this fiscal year. I have reviewed your proposed FFA schedule modification and offer the following suggestions (*see also* Attachment A).

While we are bound to the regulatory review times established in the FFA, I am committed to reviewing documents in less time wherever possible. Certainly, EPA's commitment to hazardous waste cleanup at the Naval Submarine Base ("NSBNL") is evidenced in its hiring of a full time employee expressly for the site.

As we have discussed, most of EPA's comments on the revised draft FS do not concern the remedy selection process. Rather, they are comments that may be easily addressed with FS text changes. As a result, explanation of the remedy selection process in the ROD and Proposed Plan ("PP") should be straightforward. Clearly, we can work on the drafts of the PP and ROD early, but we will not be able to release the PP to the public until the draft final FS is acceptable.

Given the nature of EPA's (and the State's) comments, I am optimistic that we can issue a ROD and start remedial design for the Area A landfill this fiscal year. I have spoken with Christine Lacas of the Connecticut Department of Environmental Protection who is also committed to this endeavor.

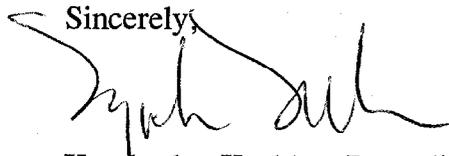
In addition to shortening regulatory review times, other cooperative mechanisms will greatly facilitate a successful collaborative working relationship and accelerate the remedial process. In particular, using EPA's model documents for RODs and PPs (electronic copies were sent to you in November 1994) and sharing electronic copies so that EPA can make text changes



directly (instead of sending separate comment letters) could cut review times considerably. Both of these proposals have worked productively at other military installations.

To this end, I must respectfully request that we try to keep our goal of September 1995 for a ROD. I understand that there are other incentives (*e.g.*, awarding the construction contract) to achieve this goal and am pleased to be able to contribute to this effort. I look forward to working with you this year toward our joint goal of remediating the Area A landfill and other areas of the NSBNL. Please do not hesitate to contact me at (617) 573-5777 should you wish to discuss this matter further.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

cc: Mark Lewis, CT DEP, Hartford, CT
Andy Stackpole, NSBNL, Groton, CT
Bob DiBiccaro, USEPA, Boston, MA
Patti Tyler, USEPA, Boston, MA
Dale Weiss, TRC, Lowell, MA

ATTACHMENT A

<u>ID Number</u>	<u>Comment</u>
3	Given that most of EPA's comments can be addressed by text changes, 45 days to respond to such comments may be excessive. Alternatively, responses to comments and the draft final FS could be developed concurrently.
7	Clearly, an extension is warranted here since the December 31, 1994 deadline has already passed. However, the draft PP should be submitted very soon, and certainly before January 20, 1995.
8 & 15	If EPA's model documents are followed, 45 days (or possibly 30) may be achievable.