UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

March 2, 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: Review of the Navy's Responses to EPA comments on of the Revised Draft Focused Feasibility Study for Area A Landfill

Dear Mr. Evans:

I am writing in response to your request for EPA to review the U.S. Navy's Responses to our comments on the *Revised Draft Focused Feasibility Study for Area A Landfill* dated January 31, 1995. EPA reviewed these responses in light of their adequacy in addressing EPA's written comments dated December 22, 1994, and the issues raised at the January 4, 1995 meeting. In general, EPA is pleased that the Navy has concurred with most of EPA's comments and agrees to incorporate the requested changes in the draft final Focused Feasibility Study ("FFS"). I look forward to seeing these changes in the draft final FFS.

EPA recognizes that many of our comments will be addressed during remedial design, including the disturbances to the Area A wetland and the coinciding mitigation. The FFS, however, should briefly state that the Navy is undertaking an analysis to identify the cap configuration that minimizes impacts to the wetland.

Although, the Navy has agreed to revise the FFS and the Proposed Plan to show the cap extending over the entire thirteen acres of the landfill, the response states that the cap limits may be revised pending the results of additional sampling and analysis of the subject area. While EPA is receptive to this approach, the Navy should provide EPA and the Connecticut Department of Environmental Protection with its proposed sampling and analysis plan for review and approval before such an approach is undertaken.

The second to last paragraph of EPA's comment letter has not been addressed. EPA requested that the Navy evaluate the impact of settling on the landfill cap as a result of dewatering (from a potential groundwater remedial action). The FFS should state that such an analysis will be addressed during design.

I look forward to completing the FFS and working on the Area A Landfill design. Please do not hesitate to contact me at (617) 573-5777 should you have any questions or wish to arrange a meeting.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

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

ATTACHMENT A

Page	Comment
p. 13, ¶1	The Navy's response states that the landfill may have received radioactive wastes, in addition to the other wastes listed in the response. This conflicts with page 33, ¶3 of the Revised Draft FFS, which concludes that no anthropogenic contamination or buried radioactive materials exist in the landfill based on the radiation survey conducted in the Phase I Remedial Investigation. The Navy should discuss the accuracy of the radiological survey for detecting and characterizing the radiological materials suspected to have been disposed in the landfill.
p. 13, ¶3	EPA requested that the FS define the type and duration of wastes stored on the concrete pad adjacent to Building 373. As a point of clarification, the Navy's response that states that there are no written records regarding storage of materials on the concrete pad, should be added to the FFS.
pp. 30 & 32	The last sentence of EPA's comment requested that the FFS explain how the cap will protect groundwater from being contaminated by the landfill. This discussion should be in the draft final FFS.
p. 33, ¶7 & top of p. 35	The landfill cap design plans should include test pitting at any location where the objects identified in the Ground Penetrating Radar survey are 5 gallons or larger. The contents of the objects encountered during test pitting should be evaluated (*i.e.*, soil, liquid, empty). Objects containing liquids must be removed, and objects with voids must be removed or crushed. The design plans should provide procedures for performing this work.
p. 148	Clarify Figure 4-1. It is not clear whether the "New Subsurface Drainage Piping" on cross-section A-A' and the detail that illustrates "Subsurface Drain Trench Detail" refer to the same feature. The wording for each feature shown in the cross-section, detail, and figure should be consistent. Also, the figure should include the detail of the impervious liner and concrete collars for the storm drain pipe. The remedial design documents (plans and specifications) should include procedures for evaluating the effectiveness of this system, owing to the potential for increased infiltration along the storm drain and into the storm drain over time.