



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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October 22, 2003

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: Annual Landfill Inspection Report 2003 for Site No. 2, Area A Landfill

Dear Mr. Evans:

EPA reviewed the *Annual Landfill Inspection Report 2003 for Site No. 2, Area A Landfill, Naval Submarine Base - New London Groton, Connecticut*, dated October 2003. The document was prepared by Environmental Chemical Corporation for the Engineering Field Activity Northeast, Naval Facilities Engineering Command. This document presents a report for the annual landfill inspection at the Area A Landfill conducted on June 4, 2003. The review of this report focused on the consistency of the inspection with the O&M manual requirements, and the completeness and technical accuracy of the information presented. In general, it appears that a comprehensive inspection was conducted by apparently qualified personnel, in accordance with the O&M Manual requirements. EPA believes, however, that this should be better documented by including additional information described in the comments. A few aspects of the inspection were not described in sufficient detail to determine if all aspects of the inspection were conducted as required by the O&M Manual. Detailed comments are provided in Attachment A.

The inspection checklist, which should have been included in the Attachments section, was missing. The inspection checklist is required to better document that all aspects of the inspection have been completed. Please include a copy of the inspection checklist in this report.

It would be appropriate to include photographs of all deficiencies in the Attachments Section.

The report should be edited to include an introductory section that lists the resources that were reviewed by the inspection contractor to provide background for conducting the inspection at this facility. This discussion should document that the inspection contractor had sufficient knowledge of the site and site history to properly and comprehensively conduct the inspection. The introductory section should also document the notification given to the regulatory agencies regarding the inspection schedule, as the agencies have requested and as the O&M Manual requires (see Section 1.7.1 of the O&M Manual). Please include the notification dates and the regulatory personnel who were notified. Finally, include in either the introductory or

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attachments section information about the personnel who conducted the inspection, such as their Connecticut certifications and their relevant experience to demonstrate that the inspection was conducted by qualified personnel, as required by the O&M Manual.

A supplemental inspection was recommended by the inspection contractor for September 2003 to inspect the progress of grass growth and to evaluate erosion concerns in vegetated areas adjacent to the landfill. No discussion of this inspection is included in this report, which should have occurred prior to issuance of this October report. If this inspection has not already occurred, it should be performed as soon as possible. Please advise us regarding the schedule for this supplemental inspection.

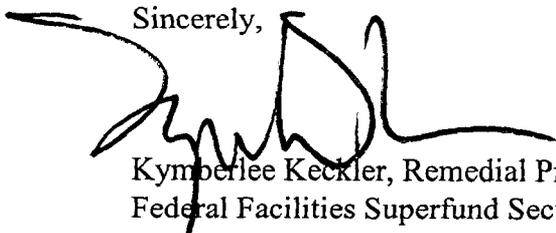
The inspection report has not identified or commented on the depression in the rip rap along the northern end of the landfill that was identified during the first five-year inspection on April 10, 2001. The five-year inspection also stated that monitoring wells had not been properly maintained or abandoned; noting that one well was completely open and unprotected. The inspection report should be edited to address the former observation, and to the extent practical, should also address the later observation (recognizing that monitoring well internal components were to be inspected separately during monitoring activities).

EPA recommends that this inspection report be revised as indicated in these comments, or that the additional information specified in the comments be provided to EPA. The next inspection report should include the items specified in the comments.

EPA also notes that a Plan of Action, as required by the O&M Manual, was not submitted to address the corrective actions recommended in the inspection report. This Plan of Action needs to be completed promptly and corrective actions scheduled to address the deficiencies noted for this inspection. Since the inspection was completed over four months ago, EPA would have expected the Plan of Action and the corrective actions to have already been completed. Please advise us of the status of the corrective actions and the status of the documents supporting the corrective actions taken.

I look forward to working with you and the Connecticut Department of Environmental Protection to ensure that the Area A landfill remedy remains protective of human health and the environment. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT
Melissa Griffin, NSBNL, Groton, CT
Jennifer Stump, Gannett Fleming, Harrisburg, PA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 1	Under Purpose: In the second paragraph, please add the names of the personnel who conducted the inspection.
p. 1	Under Security Fencing & Gates: The second paragraph refers to fencing along the southwest perimeter of the site adjacent to Wahoo Avenue. It appears from the site map that the reference should be to the northwestern perimeter. Please review and correct as appropriate.
p. 2	Under Landscaping Features: The first sentence in the second paragraph appears to refer to the northwest slope of the capped area as a landscaped area, which is not correct. Please edit the sentence to clarify that the reference should be to the area adjacent to the capped area on the north and northwest, if that is what was intended.
p. 3	<p>Under Asphalt Pavement: The second paragraph refers to cracks in the asphalt pavement which, if not repaired, will result in additional damage to the asphalt pavement including freeze-thaw damage. EPA considers this to be a deficiency that warrants immediate attention to prevent further damage to the asphalt pavement and the subsoil from erosion of the subsoil by infiltrating runoff, from vegetation growth in the cracks, and from freeze-thaw cycles. Please advise EPA what action the Navy has taken to repair the cracks before the onset of winter. To date, neither a Plan of Action nor a Completion Report has been submitted to EPA.</p> <p>Please elaborate further on the presence and potential impact of asphalt cracks by including the number and approximate length of the cracks identified. Since the report describes the cracks as located at the paving lane joints, the implication is that the major cracks are quite long and that several paving lane joint cracks must be present. Also, as observed in the photograph titled Figure 4, the report text should note that vegetation is growing in the asphalt cracks, which will further damage the asphalt and increase the runoff infiltration.</p>
p. 5	Under Housekeeping and Maintenance: The second bullet refers to poor grass conditions along the northeast perimeter. The reference should apparently be to the northwestern perimeter since the northeastern perimeter is lined with rip rap and gabion baskets. Please review and correct as appropriate.
p. 6	The text at the top of the page suggests that equipment is being stored at Area A landfill in a manner that is likely to cause damage to the asphalt pavement and

possibly to the subsurface cap components. EPA has raised this concern in previous comments to the Navy. EPA expects the Navy to implement a protocol to instruct users of the Area A Landfill in the proper storage of equipment and to implement an inspection procedure, other than the annual landfill inspection, to assess the adequacy of the instructions and the appropriateness of the storage procedures used. This request is consistent with the recommendations in this annual inspection report that call for quarterly maintenance of the Area A Landfill cap. These requirements should also be incorporated into the O&M Manual.

Deficiency Log Item numbers in the Deficiency Log do not correspond with the deficiency numbers shown in Figure 1-1. For example, Deficiency No. 2 in Figure 1-1 is unsecured gates, whereas Deficiency No. 2 in the log is Vegetation. Also, Figure 1-1 lists eight deficiencies but the log lists only seven. Please revise the deficiency numbers so that the log and the figure use the same deficiency numbers and descriptions.

Photographs All the photographs need better descriptions to identify the specific site locations being depicted in each photograph and the deficiency identified.

Is the photograph in Figure 7 depicting an oil sheen or sediment and vegetation in the drainage channel? Where was this photograph taken?