



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

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December 21, 2004

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: 2003 Annual Landfill Inspection Report for the Area A Landfill

Dear Mr. Evans:

EPA reviewed the *2003 Annual Landfill Inspection Report for Area A Landfill*, Naval Submarine Base - New London, Groton, Connecticut, dated November 2004 in light of the consistency of the inspection with the O&M manual requirements, the completeness and technical accuracy of the information presented, and conformance with EPA comments on prior versions of this document. This document presents a revised report for the annual landfill inspection at the Area A Landfill conducted on June 4, 2003 with a supplemental inspection of deficiencies conducted November 4, 2003. Detailed comments are provided in Attachment A.

Page 15 of the two inspection checklists has not been completed properly: the inspector did not date his signature and no signatures have been provided for the O&M Engineer and the IRP Manager certifying the inspection. Please provide certified copies of the two inspection checklists for 2003 and ensure that future submittals contain certified inspection checklists.

The O&M Manual requires that final versions of the "completed Site Inspection Checklists, Records of Review, Plans of Action, and Completion Reports and any other documentation and correspondence related to the maintenance and repair of the implemented site remedy," together with a detailed Table of Contents, will be incorporated into Appendix E of the O&M Manual for each landfill site. It is not clear whether this has been done.

I look forward to working with you and the Connecticut Department of Environmental Protection to protect the environs of the Naval Submarine Base. 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

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

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Attachment

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

ATTACHMENT A

Page Comment

- p. 4 The discussion in the second paragraph under Landscape Features refers to grassy areas “on the south and southeast slope of the capped area leading to the lower surface water control/retention ponds.” Rivulets are said to be located in these areas; however, Figure 1-1 does not show any rivulet deficiencies on the south or southeastern slope of the landfill. It is not apparent that the directions provided in the text are correct. They have changed from the original inspection report text that referred to rivulets on the northwestern slope, which corresponds with Figure 1-1. Figure 1-1 has not changed from the original October 2003 submittal. Please review and correct.
- p. 9 The last paragraph under General Housekeeping Issues suggests that equipment is being stored at Area A landfill in a manner that has or is likely to cause damage to the asphalt cap component and possibly to the subsurface cap components. EPA has raised this concern in previous comments to the Navy and this concern was also noted in the April 2001 five-year review. The Record of Decision (ROD) for the site requires that the Navy develop institutional controls and operation procedures to prevent/control digging or other activities that could jeopardize the integrity of the cap. Please provide to EPA a copy of the operational procedures the Navy has developed that will prevent damage to the asphalt cap component from improper storage of equipment at the site. (The inspection report states on page 2 that the Navy has developed a plan for storing equipment at the site.) The procedures should instruct users of the Area A Landfill in the proper storage of equipment and describe the inspection procedure the Navy has implemented to assess the adequacy of the instructions and the appropriateness of the storage procedures used. The ROD also states that access to the site would be controlled by continued maintenance of the existing perimeter fence and security procedures. The 2003 inspection report seems to suggest no security procedures have been implemented and identified two unsecured gates. (The April 2001 five-year review cited open gates as a deficiency that allowed unauthorized and improper use of the site.) Please provide EPA with a copy of the security procedures the Navy has developed to prevent unauthorized use of the Area A Landfill site.