



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 1  
1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

July 15, 2005

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: Draft Annual Landfill Inspection Report for the Area A Landfill

Dear Mr. Evans:

EPA reviewed the *Draft Annual Landfill Inspection Report for Area A Landfill*, Naval Submarine Base - New London, Groton, Connecticut, dated May 2005 in light of its consistency of the inspection with the O&M manual requirements, the completeness and technical accuracy of the information presented, and consideration of EPA comments on earlier year inspection report submissions. This document presents a report for the year 2004 annual landfill inspection at the Area A Landfill conducted on December 29, 2004 with a supplemental inspection conducted April 26, 2005 to inspect items that could not be inspected in December owing to snow cover and field conditions. Detailed comments are provided in Attachment A.

While I recognize that this submission is a draft, Page 15 of both inspection checklists (December 2004 and April 2005) has not been completed properly: the inspector did not sign and date the checklist and no signatures have been provided for the O&M Engineer and the IRP Manager certifying the inspection. This has been noted because previous final submissions of the completed checklist were also missing this information. Please provide certified copies of the two inspection checklists for 2004 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 apparent that this has been done to date for earlier year inspection reports. For example, these documents have not been provided for O&M Manual with control number 000005 and may not have been provided for other controlled O&M manuals. Please clarify the status of these reports for the Area A Landfill Site.

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,



Kymberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

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

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 3	<p>In the last sentence in the third paragraph, please refer to both inspection checklists and change 4 June 2003 to 29 December 2004 and 26 April 2005. The 2003 date is a remnant from the 2003 annual report.</p> <p>Under Institutional Controls, please edit the text to acknowledge that institutional controls also include site use restrictions. SOPA (ADMIN) New London Instruction 5090.18 restricts the use of the CERCLA landfill sites at the Naval Submarine Base New London and should be cited in this section. It is not apparent that the Navy is enforcing this SOPA at the Area A Landfill.</p>
p. 4	<p>The first sentence on this page discusses the condition of the fencing and gates; however, only the gates were inspected during the December 29, 2004 and no fencing was inspected on April 26, 2005. Please edit the text accordingly.</p>
p. 5	<p>The third paragraph under Asphalt Pavement discusses surface runoff to the swale; however, there was no rain event on December 29, 2004 or April 26, 2005. This text is a remnant from the earlier year inspection report. Please correct the text here and at other places in this report where a rain event is suggested.</p>
p. 6	<p>The first sentence in the second paragraph under Drainage Channels states that there were no deficiencies observed, then the remainder of the paragraph discusses the deficiencies that were observed. Please edit the first sentence to be consistent with the rest of the paragraph. It should also be noted that in several locations the Phragmites had grown through the asphalt that lines the swales. This and the other issues discussed in this section constitute a significant problem that should be addressed before the onset of winter. EPA discussed this issue with the Navy during the inspection for the December 2001 five-year review and requested that it be rectified then.</p>
p. 7	<p>Under Gas Vents, the thorough inspection of the gas vents suggested by the text did not occur on either December 29, 2004 or April 29, 2005. A superficial inspection of some of the gas vents was conducted on December 29, 2004, but not all vents were inspected and none were inspected as thoroughly as suggested by the text. Please edit the text accordingly.</p> <p>The discussion under Groundwater Monitoring Wells needs to be supplemented to discuss the significant problems observed on December 29, 2004 related to wells 2LMW20S and 2LMW20D. The text should also refer the reader to the</p>

inspection checklist for additional details related to the problems observed with the groundwater monitoring wells at the Area A Landfill.

During the inspection 2LMW20D was completely open and the well cover was missing. The well was full of water. 2LMW20S was also missing the well cover and the well cap was off of the well and lying in the road box. Both of these wells need to be repaired and redeveloped.

p. 8 The text for Drainage Channel bullet also needs to mention the *Phragmites* growth that is the biggest problem with the drainage channels because of inadequate maintenance of the channels. Besides blocking the channel flow, the *Phragmites* is also trapping significant amounts of sediment and they are growing through the asphalt channel liner.

The discussion in the first full paragraph regarding general housekeeping identifies the problems related to equipment storage. A recommendation should also be made to enforce the existing SOPA Instruction 5090.18 by requiring training with sign off and registration of any vehicles stored at the Area A Landfill. Observations during the April 26, 2005 inspection noted unsupported heavy equipment that had damaged the asphalt and leaking hydraulic fluid. Whatever effort that has been made to date to enforce good housekeeping procedures has been a colossal failure.

Figure 1-1 There is also significant invasive *Phragmites* growth and sedimentation in Channel C between the deployed parking area and the southern end of the main Area A cap. Also, please check the location of Deficiency No. 1. Reportedly the vegetation was at the northwestern end of the landfill and had been sprayed with herbicide to control the infiltration of the vegetation.

Channel B and Culvert 2 cannot be identified on this Figure because their labels have been overwritten by the rip rap symbol. Please edit the figure to reveal these labels.

Table 1-1 The description of Deficiency No. 1 states that the vegetative growth is in the western and northwestern end of the landfill but this contradicts the location shown in Figure 1-1. Please correct as appropriate.

#### **December 29, 2004 Inspection Checklist:**

p. 1 Under Cap Areas, the comments should be edited to state that because of general snow cover on the date of the inspection, the general condition of the asphalt pavement could not be observed and the inspection was rescheduled

- p. 2 Channel B, west of the deployed parking area, was not inspected.
- p.3 Channel D, south of the deployed parking area, was not inspected.
- pp. 3-7 Some of the gas vents were only superficially observed and only a few were inspected per the checklist items.
- pp. 7-14 Only a few of the groundwater monitoring wells were inspected for the checklist items during this inspection. Most wells were observed from a distance or not at all. Please clarify in the comments section of the checklist if the condition information provided in the checklist was obtained during the groundwater sampling operations. If so, please provide the date of the inspection.
- p.15 Signatures are required for the final report. The inspector did not sign and date the checklist and no signatures have been provided for the O&M Engineer and the IRP Manager certifying the inspection. This has been noted because previous final submissions of the completed checklist were also missing this information. Please provide certified copies of the two inspection checklists for 2004 and ensure that future submittals contain certified inspection checklists.

**April 26, 2005 Inspection Checklist:**

- p.2 Channel B was not inspected on December 29, 2004.
- p.3 Channel D was not inspected on December 29, 2004.
- pp.3-7 Some of the gas vents were only superficially observed and only a few were inspected per the December 29, 2004 checklist items.
- pp. 7-14 Only a few of the groundwater monitoring wells were inspected for the checklist items during the December 29, 2004 inspection. Most wells were observed from a distance or not at all. None were inspected on April 26, 2005. Please clarify in the comments section of the checklist if the condition information provided in the checklist was obtained during the groundwater sampling operations. If so, please provide the date of the inspection.
- p.15 Under Adequacy of O&M at the Site, EPA disagrees with the conclusion that maintenance activities are adequate. While some effort has been made to seal cracks in the asphalt pavement and to maintain the drainage channels by removing vegetation, the deficiencies are increasing or getting worse faster than the maintenance program has been correcting the problems. If the maintenance activity is not increased to address the growing problems, more significant deficiencies will occur.

Under Deficiencies/Item Requiring Corrections, please clarify that the *Phragmites* growth and sediment accumulation in the drainage channels has become significant and needs immediate attention and comprehensive removal. Also add that the damaged monitoring well road boxes at 2LMW20S and 2LMW20D need immediate attention - repairs should be completed this summer at the latest.

It is not apparent that Adam Roy is qualified, per the requirements stipulated in the O&M Manual, to sign as the inspector or as the O&M Engineer. Adam Roy served as inspector for the April 26, 2005 supplemental inspection, but Scott Harding, P.E., served as inspector for the December 2004 inspection. Robert Tess, P.E., also participated in the April 26, 2005 inspection. Please comply with the inspector qualification requirements or explain how Adam Roy satisfies the requirements.

Since the signatures are missing, the report is not complete. Please include signatures on the final version of the report.