



**STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



**BUREAU OF WATER MANAGEMENT
PERMITTING, ENFORCEMENT & REMEDIATION DIVISION
FEDERAL REMEDIATION PROGRAM**

April 18, 1997

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: Area A Downstream/ OBDA- State Applicable or Relevant & Appropriate Requirements
(ARARs)

Dear Mr. Evans:

Enclosed for your reference is a list of the State ARARs for the remediation of the Area A Downstream/
OBDA site at the Subase.

If you have any questions regarding this letter or the attached document, please contact me at (860)
424-3768.

Sincerely,

Mark R. Lewis
Senior Environmental Analyst
Federal Remediation Program
Permitting, Enforcement & Remediation Division
Bureau of Water Management

cc: Andy Stackpole, NSBNL Environmental Department
Kymberlee Keckler, USEPA, Boston, MA
J.P. Pradeep, Brown & Root Environmental, Pittsburgh, PA

**Naval Submarine Base New London Federal Superfund Site
Area A Downstream Wetlands and Watercourses Feasibility Study
List of State Applicable or Relevant and Appropriate Requirements
April 18, 1997**

Action Specific ARARs			
Requirement	Citation	Status	Synopsis of Requirement
Hazardous Waste Management: Generator & Handler Requirements-General Standards, Listing & Identification	RCSA §§22a-449(c)100-101	Applicable	These regulations establish standards for listing and identification of hazardous waste. The standards of 40 CFR §§260-261 are incorporated by reference. Chromium is not exempted from listing as a hazardous waste.
Hazardous Waste Management: Generator Standards	RCSA §22a-449(c)102	Applicable	This regulation establishes standards for various classes of generators. The standards of 40 CFR §262 are incorporated by reference. Storage requirements given at 40 CFR §265.15 are also included.
Hazardous Waste Management: Transporter Standards	RCSA §22a-449(c)103	Offsite Requirement	This section establishes standards for hazardous waste transporters. The standards of 40 CFR §263 are incorporated by reference.
Hazardous Waste Management: TSDF Standards	RCSA §22a-449(c)104	Applicable	This section establishes standards for treatment, storage, and disposal of hazardous waste, and establishes standards for closure, post closure, and ground water monitoring. The standards of 40 CFR §264 are incorporated by reference. Underground injection of hazardous wastes, and placement of free liquids in landfills are prohibited.
Hazardous Waste Management: Interim Status Facilities and Ground water Monitoring Requirements, Closure and Post Closure Requirements	RCSA §22a-449(c)105	Applicable	This section establishes interim status standards for treatment, storage, and disposal of hazardous waste, and establishes standards for closure, post closure, and ground water monitoring. The standards of 40 CFR §265 are incorporated by reference. The Commissioner may require ground water monitoring based on site specific considerations.
Hazardous Waste Management: Management Standards for Specific Waste Types	RCSA §22a-449(c)106	Applicable	This section establishes standards for specific types of wastes, including waste oil and spent lead acid batteries being reclaimed. The standards of 40 CFR §266 are incorporated by reference.
Hazardous Waste Management: Land Disposal Restrictions	RCSA §22a-449(c)108	Applicable	This section incorporates by reference the Federal Land Disposal Restrictions given at 40 CFR §268.
Hazardous Waste Management: Permit Requirements	RCSA §22a-449(c)110	Applicable	This section incorporates by reference the Federal hazardous waste permitting requirements given at 40 CFR §§270 & 124.

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Solid Waste Management	RCSA §§22a-209-1 to 15	Relevant and Appropriate	These regulations establish operating and closure standards for solid waste disposal areas including closure, post-closure, and groundwater monitoring requirements. Note that the definition of Solid Waste is given in CGS §22a-207.
Solid Waste Management	CGS 22a-208a through 208c	Relevant and Appropriate	This statute requires a permit for construction, alteration or operation of a solid waste management facility, or to receive, dispose of, process or transport solid waste in a solid waste facility, volume reduction plant, solid waste disposal area, recycling facility, recycling center, transfer station or biomedical waste facility.
Transportation of Oils and Chemical Liquids	CGS §22a-454	Offsite Requirement	These rules require permits for persons who transport oils and chemical liquids.
Control of Noise Regulations	RCSA §§22a-69-1 to 69-7.4	Applicable	These regulations establish allowable noise levels. They would apply to construction activities on the site.
Water Pollution Control	RCSA §§22a-430-1 to 8	Applicable	These rules establish permitting requirements and criteria for water discharge to surface water, ground water and POTWs.
Water Pollution Control	CGS §22a-430	Applicable	This statute prohibits discharge to the waters of the State without a permit.
Water Quality Standards	adopted pursuant to CGS §22a-426	Applicable	Connecticut's Water Quality Standards establish specific numeric criteria, designated uses, and anti degradation policies for groundwater and surface water. The standards were adopted pursuant to CGS §22a-426.
Connecticut Water Diversion Policy Act	CGS §§22a-365 to 378	Applicable	These rules regulate many diversions of the waters of the State. Several broad categories are exempt, including any diversion of less than 50,000 gallons per day and any discharge permitted under CGS §22a-430.
Air Pollution Control-Stationary Sources	RCSA §22a-174-3	Applicable	This regulation requires permits to construct and operate stationary sources of emissions, and requires emissions from those sources to meet specified standards. Pollution abatement controls may be required. Specific standards are listed for many pollutants. Any landfill with potential emissions of any particular air pollutant including methane exceeding 5 tons per year requires a permit under subsection 3(a)1(K). Active gas collection systems with emissions controls may be required at landfills.

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Remediation Standard Regulations	RCSA §22a-133k-1- to 3	Applicable	These regulations were adopted on January 30, 1996, under the statutory authority provided by CGS §22a-133k. They provide specific numeric cleanup criteria for a wide variety of contaminants in soil, ground water, and soil vapor. The regulations include a procedure for establishing criteria where none exist for a particular pollutant, and for establishing alternative criteria where those specified in the regulations are not appropriate.
Air Pollution Control- Control of Particulate Emissions	RCSA §22a-174-18	Applicable	This regulation sets specific standards for particulate emissions. Specific standards include Fugitive Dust (18b), and Incineration (18c). Gas flares are regulated as incinerators.
Air Pollution Control- Control of Organic Compound Emissions	RCSA §22a-174-20	Applicable	Subsection (f) sets standards for emission of organic compounds. Incineration of organic halocarbons is prohibited under subsection (f)(6)(A).
Air Pollution Control- Control of Odors	RCSA §22a-174-23	Applicable	This regulation prohibits emission of any substance that constitutes a nuisance because of objectionable odor.
Air Pollution Control- Control of Hazardous Air Pollutants	RCSA §22a-174-29	Applicable	This regulation establishes testing requirements and allowable stack concentrations for many specific substances.
Regulations for the Well Drilling Industry	RCSA §25-128-33 through 64	Applicable	These regulations apply mainly to any new water supply or withdrawal wells. The rules specify that non water supply wells must be constructed so that they are not a source or cause of groundwater contamination. Procedures for abandonment of wells apply to both water supply wells and other types of wells.
Registration and Permitting of Wells and Well Drillers	CGS §25-126 through 131	Applicable	These statutes require that well drillers be registered and permits and fees are required for each water supply well drilled. Separate registrations apply to water supply and non- water supply wells. Permits are not required for non water supply wells. However, the driller must file a completion report for both water supply and non- water supply wells.

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Location Specific ARARs			
Requirement	Citation	Status	Synopsis of Requirement
Surface Water and Wetlands- Inland Wetlands and Watercourses Regulations	RCSA §§22a-39-1 to 15	Applicable	This regulation applies to any operation within or use of a wetland or watercourse involving removal or deposition of material, or any obstruction, construction, alteration, or pollution of such wetlands or watercourses.
Surface Water and Wetlands- Inland Wetlands and Watercourses Act	CGS §§ 22a-36 to 45	Applicable	This section requires a permit for any regulated activity conducted within inland wetlands and watercourses. Regulated activities include any operation within or use of a wetland or watercourse involving removal or deposition of material, or any obstruction, construction, alteration or pollution of such wetlands or water courses. Regulation of most activities is delegated to the municipality where the regulated activity is conducted.
Coastal Management Act	CGS § 22a-90 to 112	Applicable	This section requires persons conducting activities within the coastal zone to submit a coastal site plan to the municipality. The municipality uses the coastal site plan to determine whether the proposed activity poses unacceptable impact on coastal resources and future water dependant activities. The municipality may require the applicant to take all reasonable measures to mitigate such adverse impacts.

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Chemical Specific ARARs			
Requirement	Citation	Status	Synopsis of Requirement
Remediation Standard Regulations	RCSA §22a-133k-1 to 3	Applicable	These regulations were adopted on January 30, 1996, under the statutory authority provided by CGS §22a-133k. They provide specific numeric cleanup criteria for a wide variety of contaminants in soil, ground water, and soil vapor. The regulations include a procedure for establishing criteria where none exist for a particular pollutant, and for establishing alternative criteria where those specified in the regulations are not appropriate.