



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

August 28, 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: DRAFT FINAL FEASIBILITY STUDY FOR AREA A DOWNSTREAM/OBDA

Dear Mr. Evans:

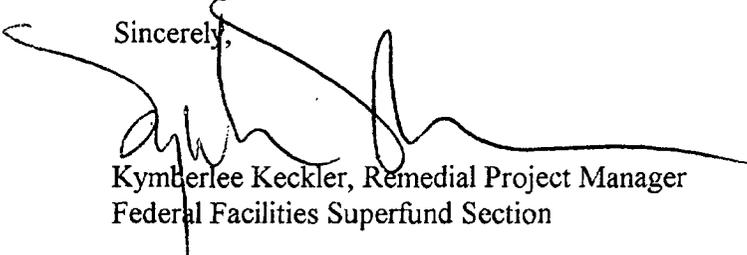
I am writing in response to your request for EPA to review the Draft Final Feasibility Study ("FS") for the Area A Downstream/OBDA dated July 1997. EPA focused its technical review on resolution of issues raised in our letters dated January 7, 1997; March 6, 1997; and June 25, 1997. For brevity, only issues warranting further comment are presented below and in Attachment A.

I am concerned that the FS maintains that Alternative 2 meets ARARs and TBCs. Alternative 2 involves a permeable soil cap and leaves contaminated soils and sediments on-site. Since there is an upward groundwater gradient in some areas (e.g., Lower Pond), it is possible for contaminants to migrate into the surface water under this alternative. Therefore, it is not clear whether Connecticut water quality standards will be met. As a result, it cannot be stated that Alternative 2 meets ARARs and cannot be considered a permanent remedy. Please revise the FS to reflect this.

The revised FS should clearly state that a restoration wetland plan and environmental monitoring program will be developed after a remedial alternative is selected. We should make arrangements to discuss this as part of Remedial Design.

I look forward to working with you and the Connecticut Department of Environmental Protection toward the cleanup of the Area A Downstream/OBDA. Please do not hesitate to contact me at (617) 573-5777 should you have any questions.

Sincerely,


Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section



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Attachment

cc: Mark Lewis, CTDEP, Hartford, CT
Andy Stackpole, NSBNL, Groton, CT
Patti Lynne Tyler, USEPA, Lexington, MA
Ken Finkelstein, NOAA, Boston, MA
Jennifer Hayes, Gannett Fleming, Harrisburg, PA
Corey Rich, Brown & Root, Pittsburgh, PA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. ES-3	The Executive Summary has not been revised as requested in EPA's January 7, 1997 letter. Please change "met to the extent possible" to "met."
p. 1-11, § 1.2.8.2	Although a sentence has been added to the text regarding the reclassification, other sentences in the paragraph were not revised and therefore the the text is contradictory. It is stated that Area A Downstream is within the northern portion of the site designated as "GA" and is within the "GB" redesignated portion of the site. The first sentence in Section 1.2.8.2 on page 1-11 should be changed to, "The groundwater beneath the northern portion of NSB-NLON had been previously classified by CTDEP as GA but is now classified as GB." This sentence could be followed by, "The groundwater at most portions of the NSB-NLON including Area A Downstream was reclassified in March 1997."
§ 1.3.5	The revised text and tables address the comment adequately. However, Table 1-13, Summary of Chemical Specific RME Risk Drivers, presented in the previous version of the FS has been excluded. This table's presentation of the percentage of risk attributable to each chemical complements the discussion of chemical specific exceedences.
p. 1-69, § 1.3.7	The reference of the Functions and Values document is not correct. It lists the document's authors as W.A. Miesring and A.H. Brawley, May 1997. It should be cited as W.A. Niering and A.H. Brawley, May 1997. Also, please include this reference in the reference section.
p. 3-23, § 3.4	The numerical standards have been deleted without a replacement.
p. 4-29, ¶3	Please rewrite the last sentence to state, "The site would be restored to allow regrowth of wetland flora."
p. 4-29, ¶1, § 4.2.3	The reference to top soils should indicate that the clean borrow fill material will have a similar organic content to the soils that are excavated. Not only will similiar tree species be replanted but shrubs and emergent vegetation will also be replanted to restore the wetland areas.