



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO

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Code 1823\ME

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Ms. Kymberlee Keckler
Remedial Project Manager
U.S. Environmental Protection Agency
J.F.K. Federal Building (HBT)
Boston, MA 02203-2211

SUBJ: RESPONSES TO USEPA LETTER OF OCTOBER 29, 1997 ON THE DRAFT
RECORD OF DECISION FOR AREA A DOWNSTREAM/OBDA

Dear Ms. Keckler:

Thank you for reviewing the Draft Record of Decision for the Area A Downstream/OBDA site at the Naval Submarine Base New London. Please find attached the Navy's responses to the comments in your October 29, 1997 letter.

If you have any other questions or comments please do not hesitate to contact me at (610) 595-0567 ext. 162.

Sincerely,

A handwritten signature in cursive script that reads "Mark Evans".

Mark Evans
By direction of the
Commanding Officer

Copy to:
Mr. Mark Lewis, CTDEP
Mr. Dick Conant, NSB-NLON
Mr. Jean-Luc Glorieux, Brown & Root - Pittsburgh

**RESPONSES TO
USEPA'S OCTOBER 22, 1997 LETTER OF COMMENTS
REGARDING THE
SEPTEMBER 1997 DRAFT ROD
FOR THE AREA A DOWNSTREAM/OBDA
NAVAL SUBMARINE BASE NEW LONDON
GROTON, CONNECTICUT**

November 21, 1997

GENERAL COMMENTS (COVER LETTER)

1. Cover Letter, page i, 2nd paragraph:

Comment: The description of remedies in the Feasibility Study, Proposed Plan, and the ROD should be consistent. The descriptions of some alternatives and the costs are not consistent between the FS and the draft ROD. Please review these documents for consistency.

Response: The U.S. Navy agrees that the description and cost of alternatives should be consistent between the FS, Proposed Plan, and ROD. It is unclear as to what inconsistencies are being referred to since the U.S. Navy believes that the description and cost of all alternatives are consistent between the July 1997 Draft Final FS report and Final Proposed Plan, and the September 1997 Draft ROD, with the exception of Alternative 2. The present-worth cost reported for Alternative 2 in the Draft Final FS was \$2,623,000, as opposed to \$ 2,923,000 that was reported in the ROD. This minor adjustment was required because a surface water monitoring component was inadvertently omitted in the FS. The error is regretted.

However, a more significant discrepancy may be noted between the descriptions and costs presented in the December 1996 Revised Draft FFS report and those presented in the July 1997 Draft Final FS report because a revision in the estimates of areas and volume of contaminated soil was made between those two dates. This discrepancy is due to a reduction in the estimated areal extent of soil contamination in response to U.S. EPA's suggestion (responses to Comment Nos. 10 and 33 of U.S. EPA's January 7, 1997 letter of comments on the December 1996 Revised Draft FFS report), and as discussed during a phone conference held on January 16, 1997. Accordingly, the volume of soil to be remediated was reduced by approximately 60 percent, leading to a corresponding reduction in the estimated remediation cost.

Resolution is required.

SPECIFIC COMMENTS (ATTACHMENT A)

2. Table of Contents:

Comment: Please add "Appendix A - Meeting transcript," "Appendix B - Responsiveness Summary," and "Appendix C - Declaration of Concurrence."

Response: The following Appendices will be obtained from the U.S. Navy and included in the ROD: Appendix A- Meeting Transcript; Appendix B- CTDEP Comments on the PRAP; Appendix C- Responsiveness Summary; and Appendix D- Declaration of Concurrence

3. Declaration for the ROD, Page 1:

Comment: In the first paragraph of the Assessment section, include the following required language: "Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this ROD, may present a current or potential threat to public health, welfare, or the environment."

Response: The language suggested in the first paragraph of the Assessment section refers to hazardous substances. The U.S. EPA agreed with the U.S. Navy (per letter dated June 25, 1997 from Kymberlee Keckler to Mark Evans) that the pesticide-contaminated soils and sediments at the site are not RCRA hazardous wastes. The modification suggested will be made with the understanding that the words "hazardous substances from this site" does not imply that RCRA hazardous wastes are present at this site. Accordingly, the first paragraph will be modified to read as follows: "Actual or threatened releases of ~~contaminants~~ **hazardous substances** from this site, if not addressed by implementing the response action selected in this ROD, may present ~~an imminent and substantial endangerment~~ **a current or potential threat** to public health, welfare, or the environment. *It should be noted, however, that the term hazardous substances does not imply that RCRA hazardous wastes are present at this site. It was determined by the U.S. Navy and agreed by the U.S. EPA (per letter dated June 25, 1997 to the U.S. Navy), that the pesticide-contaminated soils and sediments at the site are not RCRA hazardous wastes.*"

4. Declaration for the ROD, p. 1 (continued):

Comment: Replace the second paragraph of the Assessment section, with "The U.S. Navy has determined that remedial action is necessary for this site because the risks to potential human associated with the soil and sediment at this site exceed the U.S. EPA limit of cumulative noncarcinogenic Hazard Index (HI) of 1.0. Also the risks for these potential receptors exceed Connecticut Department of Environmental Protection's (CTDEP) Remediation Standards limit of 1×10^{-6} Incremental Cancer Risk (ICR) for individual contaminants with a cumulative ICR exceeding 1×10^{-5} and cumulative HI exceeding 1.0. Although there are currently minimal human health risks posed by the site, this ROD selects the remedy to address potential future risks to humans."

Response: The paragraph will be replaced as requested.

5. Declaration for the ROD, p. 1 (continued):

Comment: The ecological risk assessment concluded that exposure to surface water and sediment concentrations of DDT and its metabolites DDD and DDE, and to a lesser extent, dieldrin, were responsible for adverse ecological effects to aquatic biota, in particular sediment-dwelling organisms. Terrestrial vertebrates are also at risk from exposure to DDT and its metabolites in soil as a result of indirect exposure through consumption of contaminated prey."

Response: The paragraph will be added as requested.

6. Declaration for the ROD, p. 2:

Comment: *Description of the Selected Remedy:* Please delete the first two sentences of the first paragraph.

Response: The sentences will be deleted as requested.

7. Declaration for the ROD, p.2 (continued):

Comment: *Statutory Determinations:* In the second sentence, change "health-based" to "health- or ecologically-based".

Response: The changes will be made as requested.

8. Page 1-5, last sentence:

Comment: Please indicate that the debris was removed as part of a removal action and that some of the debris was characterized as hazardous (e.g., acetylene tanks).

Response: The last sentence on page 1-5 will be replaced by the following sentences: "The above mentioned debris was removed as part of a removal action in March 1997 and some of the debris (such as acetylene tanks) were characterized as hazardous. The debris was disposed of at suitable landfills or recycling facilities off site according to the Final Removal Action Report (Foster Wheeler, July 1997)". The reference will be added to the list of references.

9. Page 2-1, Section 2.1:

Comment: Delete "Of necessity" in the second sentence and start the sentence with "To protect its...". There is no indication that these areas were treated for any reason other than to eliminate a nuisance.

Response: The words "Of necessity" will be deleted as requested.

10. Page 2-1, Section 2.1, paragraph 2:

Comment: In the second sentence, change "at the nearby" to "adjacent to nearby". Delete "Relatively minor" from the third sentence. Delete "certain" from the fourth sentence. In the fifth sentence, change "less contaminated areas" to "less contaminated reference areas".

Response: All of the changes will be made as requested.

11. Page 2-1, Section 2.1:

Comment: At the end of the third sentence, insert "(see Section 120)".

Response: The requested addition does not seem to be relevant to the context of the paragraph. Clarification is requested.

12. Page 3-3, last paragraph:

Comment: Please modify the third sentence to reflect that CTDEP sent written comments (see their letter dated August 18, 1997).

Response: The third sentence will be modified to read as follows: "The Navy did not receive any written comments *from the public* during the 30-day public comment period." The following sentence will be

added: ***"The U.S. Navy received a letter dated August 18, 1997 from the CTDEP expressing their support of the Proposed Plan as presented."***

13. Page 4-1, paragraph 2:

Comment: In the second sentence, insert "retained for detailed screening in the FS" after "alternatives".

Response: The insertion will be made as requested.

14. Page 4-1, paragraph 3:

Comment: Define "soils" and "sediments" after the first sentence or in the glossary.

Response: The following introductory sentences will be added after the first sentence in the second paragraph on page 4-1: ***"As identified in the Phase II RI (B&R Environmental, March 1997) samples of media collected in the stream beds, pond bottoms, and associated wetlands in the vicinity of these water bodies are assumed to be sediments and the solid media outside of the sediments are assumed to be soil"***. No change will be made to the third paragraph.

15. Page 4-1, paragraph 3, 2nd sentence :

Comment: How will the seepage be diverted the bypass areas, via a culvert or ditch. Will the ditch be stabilized so that it does not cause erosion problems to downstream waters? If no specifics are known at this time, the section should state that the design for the bypass system will be addressed in the Remedial Design Phase.

Response: The following sentences will be added to this paragraph: ***"Stream diversion details will be decided during remedial design. Erosion and sediment controls associated with these stream diversions will be also be addressed during remedial design"***.

16. Page 4-1, paragraph 4:

Comment: Replace "PRGs" with "preliminary remediation goals (PRGs)".

Response: It is assumed that the reference is to remedial action goals (RAOs) and not PRGs. The entire document will be scanned and RAOs will be replaced with remediation goals. The term ***"remediation goals"*** will be used in preference to "PRGs" because they are no longer considered "preliminary" in a ROD.

17. Page 4-1, paragraph 5:

Comment: Insert the following new paragraph after the fifth paragraph: ***"Following excavation and disposal of contaminated sediments and soils, the excavated areas will be backfilled with clean fill with comparable organic content to the excavated sediments. During remedial design, alternative methods of erosion control (e.g., placement of hay bales or vegetative matting) will be considered for stream beds and pond side slopes."***

Response: The paragraph will be replaced as suggested with a few minor editorial changes, as follows: ***"Following excavation and disposal of contaminated sediments and soils, the excavated areas will be***

backfilled with clean fill with comparable organic content to the excavated sediments *and soil*. During remedial design, alternative methods of erosion control (e.g., placement of hay bales or vegetative matting) will be considered for stream beds and pond *side-slopes banks*."

18. Page 4-1, paragraph 6:

Comment: Delete the first two sentences (starting with "Following excavation and disposal ... during remedial design.>").

Response: The sentences will be deleted as requested.

19. Page 4-2, paragraph 2:

Comment: Replace the entire paragraph with: "The diversions to the surface water and groundwater inflow to the area will be discontinued, and flow will be routed through the recreated waterways. The functions and values of the wetland communities associated with the site will be replaced according to state and federal standards, as determined during remedial design."

Response: The paragraph will be replaced as suggested with a few minor editorial changes, as follows: "The diversions to the surface water and groundwater inflow to the area will be discontinued, and flow will be routed through the recreated *restored* waterways. The functions and values of the wetland communities associated with the site will be replaced *to the extent practicable* according to *applicable* state and federal standards, as determined during remedial design."

20. Page 5-1, Section 5.1, paragraph 2:

Comment: Modify the third sentence to read: "The site primarily consists of scrub-shrub and forested wetlands characterized by a canopy dominated by hardwoods (primarily oaks) and a secondary mixed hardwood forest dominates the wetland edge." In the fourth sentence, replace "*Kalmia* sp." with "laurel."

Response: The sentences will be modified as requested.

21. Page 5-1, Section 5.1, paragraph 3:

Comment: Replace this paragraph with the following: Three small ponds (Upper Pond, Lower Pond, and OBDA Pond) and six small streams (Streams 1 through 6) are present at the site. The marine sediment contained in the Area A Wetland influences water quality in these water bodies, as elevated salinity was routinely recorded during surface water measurements taken at the site. The ephemeral nature of the streams and the shallowness of the pools make them unsuitable habitat for fish. No rare or endangered species of flora or fauna have been recorded in previous investigations such as the Phase II RI (B&R Environmental, 1997a) and the Functions and Values Assessment of Area A Downstream and Water Courses (Niering and Brawley, 1997)."

Response: The paragraph will be replaced as requested.

22. Page 5-1, Section 5.1.1, paragraph 1:

Comment: Delete "classified as" and "that is" from the second sentence.

Response: The words will be deleted as requested.

23. Page 5-2, Section 5.1.1, paragraph 1:

Comment: Replace "Najas sp." with "two submerged aquatic plants, duckweed and water starwort." In the next sentence, replace "nonpersistent" with "persistent".

Response: The words will be replaced as requested.

24. Page 5-2, Section 5.1.2:

Comment: In the fourth sentence, insert "by a monotypic stand of the" before "common reed". In the next sentence, replace "the prevalent shrub and tree vegetation associated with this wetland" with "some of the more prevalent shrub and tree vegetation species surrounding the pond".

Response: The words will be inserted and replaced as requested.

25. Page 5-3, Section 5.1.4:

Comment: Replace the last sentence with "thirty nine vegetative species were recorded in the upper portion of the stream (Niering and Brawley, 1997)."

Response: The sentence will be replaced as requested.

26. Page 5-3, Section 5.1.5:

Comment: In the last sentence before the cite, insert "consisting of red maple, white ash, black gum, highbush blueberry, and sweet pepperbush."

Response: The words will be inserted as requested.

27. Page 5-3, Section 5.1.6:

Comment: Replace the last sentence with "Stream 3 exhibits a high overall species richness (40 vegetative species recorded) that are typical of streams located adjacent to steep banks. (Niering and Brawley, 1997)."

Response: The sentence will be replaced as requested.

28. Page 5-4, Section 5.2:

Comment: Delete the eighth and ninth sentences.

Response: These sentences indicate that the inorganic contamination in the soil is not significant, and lend support to not developing remediation goals. Note that remediation goals for inorganics were developed only for sediments. Therefore, these sentences are relevant and must be retained. No deletion proposed.

29. Page 5-5:

Comment: Delete "of significance" in the fourth bullet.

Response: The words will be deleted as requested.

30. Page 5-6:

Comment: Is the first reference to DDT in the bullet regarding Zone 6 supposed to be "DDD"?

Response: No. The second reference to DDT in the same sentence should be DDD and will be corrected.

31. Page 6-1, Section 6.0:

Comment: Please change "contaminants" to "hazardous substances" to be consistent with the same statement in the Declaration.

Response: The U.S. Navy disagrees with the requested change. The use of the word "contaminants" in this section (except Section 6.5) does not conflict with the "standard language" in the declaration. The word "contaminants" is used in a scientific sense in this section and does not conflict with the available guidance on preparing Superfund decision documents. However, the change will be made in the "standard language" under Section 6.5, as noted further on in response to Comment No. 48. No change proposed.

32. Page 6-1, Section 6.0, paragraph 2:

Comment: Insert "human health and ecological" before "risk assessment".

Response: The words will be inserted as requested.

33. Page 6-1, Section 6.0, paragraph 3:

Comment: After "(1)" insert "conceptual model development and". In (3), insert, "and ecological effects" after "adverse health". At the end of the last sentence, insert "and uncertainties inherent in the risk assessment process".

Response: The insertions will be made as requested.

34. Page 6-2, Section 6.1, Table:

Comment: Add dieldrin to the pesticide rectangle.

Response: The addition will be made to the table as requested.

35. Page 6-2, Section 6.2:

Comment: Delete the last paragraph in this section.

Response: The last paragraph mentions that there are no current receptors at imminent risk, therefore, it must be retained. The rationale for requesting deletion this paragraph is not clear.

36. Page 6-2, Section 6.3:

Comment: Insert "and ecological effects" after "human health" in the first and second sentences. In the second sentence, change "severity of probability" to "severity and probability".

Response: The insertions and changes will be made as requested.

37. Page 6-3, Section 6.3, paragraph 1:

Comment: Delete the last sentence.

Response: The sentence in question was stated in the Phase II RI (B&R Environmental, March 1997). The rationale for requesting deletion is not clear.

38. Page 6-3, Section 6.3, paragraph 2:

Comment: Delete the first sentence. Change the second sentence to "The chemicals of concern for ecological receptors are selected based on the comparison between chemicals detected in surface soils, surface water, sediment and predicted body burdens in concentrations greater than regulation-based criteria (such as ambient water quality criteria), ecotoxicological guidance provided by agencies (U.S. EPA, the Ontario Ministry of the Environment, Oakridge National laboratories, National Oceanic and Atmospheric Administration, etc.), and supplemental ecological investigations such as benthic community analyses and sediment toxicity tests."

Response: The first sentence will be deleted. The second sentence will be replaced as requested with a few minor editorial changes. The second sentence will read: "The chemicals of concern for ecological receptors are selected based on *the finding of* chemicals detected in surface soils, surface water, or sediment or predicted body burdens, in concentrations greater than regulation-based criteria (such as ambient water quality criteria), ecotoxicological guidance provided by agencies (U.S. EPA, the Ontario Ministry of the Environment, Oakridge National laboratories, National Oceanic and Atmospheric Administration, etc.), and supplemental ecological investigations such as benthic community analyses and sediment toxicity tests."

39. Page 6-4, paragraph 3:

Comment: In the first sentence, delete everything after the comma and merge the beginning with the second sentence.

Response: The change will be made as requested.

40. Page 6-8, Section 6.4.2:

Comment: Insert "(including benthic organisms)" after aquatic organisms in the second sentence.

Response: The words will be inserted as requested.

41. Page 6-10, Table 6-4:

Comment: Change the second sentence in the footnote to "Only contaminants with an HQ or HI > 1 are listed."

Response: The sentence will be changed as requested.

42. Page 6-11, Section 6.4.2.2:

Comment: Replace the first three paragraphs with: "Risks to aquatic organisms were evaluated by taking the ratios (hazard quotients, or HQs) of exposure concentrations and comparing them to ambient water quality criteria. Table 6-4 shows that average (across areas) exposure levels for DDTR and dieldrin result in high potential for ecological risk (as noted by the Hazard Quotients or HQs and Hazard Indices or HIs), while common metals have moderate potential for ecological risk and metals like cadmium, lead, and copper have low potential for posing ecological risks.

Macroinvertebrate sediment toxicity tests were conducted for the Phase II RI to determine if sediment collected from the Area A Downstream/OBDA were toxic. Mortality of test organisms exposed to sediment samples collected from Area A Downstream/OBDA which is composed of Upper Pond, Lower Pond, OBDA Pond, and Streams 1-4 was statistically significantly greater than that recorded for organisms exposed to sediment collected from the reference locations. Survival of the two benthic macroinvertebrate species, *Chironomus tentans* and *Hyalella azteca* was extremely low in most sediments and 100% mortality occurred in Lower Pond sediments. Other physical and chemical characteristics of the sediment (e.g. high concentrations of organic matter, low dissolved oxygen content and hydrogen sulfide odors) collected from these streams and ponds could have contributed to the observed adverse effects. However, these sediment toxicity test results conclude that some sediments in the Area A Downstream/OBDA adversely impact benthic macroinvertebrates.

A triad score method (that used measures of three critical components of ecological effects) was used to assess the ecological risk. The sediment triad scores were used to compare Area A Downstream/OBDA water bodies to reference locations in terms of sediment chemistry, sediment toxicity, and macroinvertebrate (e.g., aquatic insects, snails, worms) community characteristics. Differences between reference and site locations in toxicity scores are apparent from the sediment triad ranks in Table 6-5."

Response: The first and third of the three paragraphs will be replaced as requested. The second paragraph will be replaced as requested with a few minor editorial changes to the last sentence. The last sentence will now read: "However, these sediment toxicity test results *show* that some sediments in the Area A Downstream/OBDA adversely impact benthic macroinvertebrates."

43. Page 6-13, paragraph 2:

Comment: Delete the fourth sentence and replace the fifth sentence with "When coupled with the results of sediment toxicity tests conducted on samples collected from these same locations, the results of the characterization lend support to the conclusion that sediments within Area A Downstream/OBDA represent a significant risk to benthic macroinvertebrates".

Response: The fourth sentence will be deleted. The fifth sentence will be replaced as requested.

44. Page 6-13, Section 6.4.2.3:

Comment: Replace the first sentence with "The amount of DDTR to which terrestrial vertebrates may be exposed was determined by calculating the total dose these receptors received from ingestion of contaminated prey, incidental ingestion of soil/sediment, and from drinking water".

Response: The sentence will be replaced as requested with one minor editorial change. The modified sentence will read: "The amount of DDTR to which terrestrial vertebrates may be exposed was determined by calculating the total dose to these receptors received from ingestion of contaminated prey, incidental ingestion of soil/sediment, and from drinking water."

45. Page 6-14, Section 6.4.2.3:

Comment: Replace the second paragraph with "Several conservative assumptions such as assuming home range consisted of the entire site were made on the input parameters to the food-chain modeling. However, more realistic exposure parameters were incorporated into the food-chain modeling modified in the Feasibility Study (Brown and Root Environmental, July 1997). The risk assessment did determine that exposure to contaminated soils represent a potential risk to terrestrial vertebrates such as the short-tailed shrew, barred owl, mallards, and raccoons. Based on the modeling results, the potential risks to the terrestrial vertebrates of concern are presented in Table 6-4."

Response: The paragraph will be replaced as requested.

46. Page 6-14, Section 6.4.2.4:

Comment: *Pesticides Remediation Goals:* Delete the last sentence. In the third sentence, replace "evaluated" with "calculated" and insert "from food chain models" after "doses of pesticides". Start the second paragraph with "In addition" and insert "sediment toxicity results" after "community characteristics" in 2).

Response: The last sentence will be deleted and other changes will be made as requested.

47. Page 6-16, Section 6.4.2.4:

Comment: *Inorganics Remediation Goals:* Replace the first sentence with "Inorganics Remediation Goals were selected as the National Oceanographic and Atmospheric Administration (NOAA) Effects-Range Median (ER-M) values for the inorganic COCs."

Response: The sentence will be replaced as requested.

48. Page 6-18, Section 6.5:

Comment: Change "contaminants" to "hazardous substances".

Response: See response to Comment No. 3. The word "contaminant" will be replaced by "hazardous substances" with the understanding that the sentence shall not be construed to mean that RCRA hazardous wastes are present at this site. Accordingly, the following sentences shall be added in this section, in order to be consistent with the Declaration: "It should be noted that the use of the term "hazardous substances" does not imply that RCRA hazardous wastes are present at this site. It

was determined by the U.S. Navy and agreed by the U.S. EPA (per letter dated June 25, 1997 to the U.S. Navy), the pesticide-contaminated soils and sediments at the site are not RCRA hazardous wastes."

49. Page 7-1, Section 7.1, paragraph 1:

Comment: In the second sentence, change "requirements criteria or limitations, unless..." to "requirements, criteria, or limitations under an environmental or facility siting law, unless..."

Response: The change will be made as requested.

50. Page 7-2, Section 7.1, paragraph 3:

Comment: In the last sentence, change "remedial design" to "remedial action".

Response: The change will be made as requested.

51. Page 7-4:

Comment: In Figure 7-2, please either delete or modify the hatching around the torpedo shops since it is very similar to the hatching used to denote the areas of sediment to be excavated.

Response: The hatching around the torpedo shops will be deleted because they are not relevant to the intent of the figure.

52. Page 8-1, paragraph 1:

Comment: Change "On base Backfilling of Treated Soil" throughout the document to "On base Reuse of Treated Soil". Once treated, can the soil be used anywhere on the base for any purpose that does not involve its use below the groundwater level? If so, how will the use of the soil be controlled? (See also page 8-4, Heading of Section 8.4; the last bullet on page 9-2; the second sentence on page 9-5, paragraph 2; and page 9-7, paragraph 1, last sentence).

Response: The change will be made at all of the noted locations in the document as requested. A sentence will be added to the description of Alternative 4 under Section 8.4 as follows: "**Appropriate reuse locations on base would be determined during remedial design**". Once treated, the soil can be reused in any industrial setting on base where the ground elevation is not below the seasonal high groundwater table level.

53. Page 8-1, Section 8.2, paragraph 1:

Comment: In the last sentence, change "the risks of doing nothing are" to "doing nothing is". Add a new last sentence: "At this Site the No Action alternative would result in contamination being left in place which would be a continued threat to human health and the environment."

Response: The new sentence will be added as requested.

54. Page 8-1, Section 8.1, paragraph 3:

Comment: Delete "derived from TBC guidance".

Response: The words will be deleted as requested.

55. Page 8-1, Section 8.2:

Comment: There is no discussion of the mesh biotic barrier that was described in the FS.

Response: The biotic barrier is mentioned in the first sentence. This section was intentionally written without presenting all the details of each alternative, as the FS does. No additional details are proposed in this ROD.

56. Page 8-1, Section 8.2:

Comment: After the second sentence, insert "All of the groundwater and surface water seepage into the site from the Adjacent Area A Wetland and Area A Landfill will be diverted to bypass the areas of the proposed filling and discharged into downstream culverts."

Response: The insertion will be made with a few editorial changes, as follows: "All of the groundwater *seepage* and surface water *seepage run on* into the site from the adjacent Area A Wetland and Area A Landfill will be diverted to bypass the areas of the proposed *filling capping* and *be* discharged into downstream culverts."

57. Page 8-2, paragraph 1:

Comment: After "species of flora", insert "The diversions to the surface water and groundwater inflow to the area will be discontinued, and flow will be routed through the recreated waterways. The wetland functions and values of the original wetlands (as they would have existed in the absence of contamination) will be replaced according to state and federal standards, as determined during remedial design."

Response: It is impossible to design a remediation based on the presumed wetlands functions and values of the original wetlands (as they would have existed in the absence of contamination) because a functions and values assessment was not performed before the application of DDT or placement of dredge spoils upgradient of the site. Indeed, the wetlands at this site may not even have existed prior to placement of the dredge spoils and construction of the ponds and streams for drainage purposes.

Therefore, after "species of flora", the requested sentences will be inserted with a minor modification as follows: "The diversions to the surface water and groundwater inflows to *around the remediated* area will be discontinued, and flow will be *routed reestablished* through the *recreated reconstructed* waterways. The wetland functions and values of the *original wetlands (as they would have existed in the absence of contamination)* will be replaced according to *state and federal standards* *wetlands will be replaced to the extent practicable*, according to state and federal standards, as determined during remedial design."

58. Page 8-2, paragraph 3:

Comment: In the first sentence, replace "key" with "location-specific".

Add the following third and fourth bullets:

- Federal Clean Water Act, Section 404 (applicable to filling of wetlands).
- State of Connecticut Inland Wetlands and Watercourses (applicable to work in wetlands and waterways). (See also pages 8-4 and 8-5, last paragraph and paragraph 1, respectively.)

Response: The word "key" will be replaced with "location specific".

The third and fourth bullets will be added as requested.

59. Page 8-2, paragraph 4:

Comment: Replace the first sentence with: "The alternative would comply with chemical-specific ARARs and TBCs, particularly the State of Connecticut Remediation Standards for soils."

Response: The sentence will be replaced as requested.

60. Page 8-2:

Comment: *Operating and Maintenance Cost:* Does this cost reflect the cost of monitoring the wetland and waterway restoration over a multiple year period?

Total Cost: Why is the listed cost of \$2,923,000 significantly different from the \$4,285,000 cited in the FS?

Response: Operating and maintenance cost includes only that associated with surface water monitoring over 30 years with five-year reviews.

See response to Comment No. 1. The total cost of \$ 2,923,000 for Alternative 2 is significantly lower than the \$ 4,285,000 cost reported in the December 1996 Revised Draft FFS because of a reduction of approximately 50% in the estimated areal extent of contamination. However, the \$ 2,923,000 cost is only a little higher than the \$2,621,000 cost reported in the July 1997 Draft Final FS, because of a minor adjustment that included surface water monitoring costs.

Additional cost of monitoring wetland and waterway restoration will be included based on U.S. EPA Region I guidance. This additional cost will be included in the cost for Alternatives 2, 3 and 4.

61. Page 8-3, paragraph 1:

Comment: Insert a new fourth sentence. "The excavated areas will be backfilled with clean material and wetlands and waterways restored. The wetland functions and values of the original wetlands will be replaced according to state and federal standards, as determined during remedial design."

Response: As discussed under response to Comment No. 57, the restoration of the functions and values of the original wetlands cannot be ensured. Therefore, the sentences suggested above will be inserted with a minor modification as follows: "The excavated areas will be backfilled with clean material and wetlands and waterways ~~restored~~ **reconstructed**. The wetlands functions and values will be ~~replaced~~ **restored to the extent practicable** according to state and federal standards, as determined during remedial design."

Also, the following sentence will be inserted in the beginning of the description of this alternative on page 8-3 and the beginning of the description of Alternative 4 on page 8-4: "***Under this alternative, all of the***

groundwater seepage and surface water run on into the site from the adjacent Area A Wetland and Area A Landfill will be diverted to bypass the areas of the proposed excavation and be discharged into downstream culverts."

62. Page 8-3, paragraph 2:

Comment: Add the changes recommended for page 8-2, paragraph 3.

Response: The two bulleted items of location-specific ARARs will be added as requested.

63. Page 8-3, paragraph 3:

Comment: After "site restoration" in the first sentence, add "of wetland and waterway functions and values."

Response: The words will be added as requested.

64. Page 8-3, paragraph 3 (continued):

Comment: Change the text in the second sentence to: "The alternative would comply with chemical-specific ARARs and TBCs, particularly the State of Connecticut Remediation Standards for soils."

Response: The change will be made as requested.

65. Page 8-4:

Comment: *Estimated Time for Remedial Action* and cost estimate: This does not appear to include the time and cost for monitoring of the wetland and waterway restoration. Once the details of the remedial plan are resolved this could entail extensive monitoring to ensure that the wetland restoration is successful.

Response: Cost associated with additional monitoring to ensure that the wetland restoration is successful will be included in accordance with U.S. EPA Region I guidance. This additional monitoring will also increase the length of the remedial action by approximately 5 years. The costs will be changed accordingly. As discussed under response to Comment No. 60, the costs associated with the other alternatives will also be changed accordingly. The remedial durations will also be increased by 5 years for Alternative 2 on page 8-2, for Alternative 3 on page 8-4 and Alternative 4 on page 8-5.

66. Page 8-4, Section 8.4:

Comment: Change "contamination" to "contaminated" in the second sentence.

Replace "backfilled" with "reused" in the eleventh sentence.

Add "and inorganic COCs" after "background levels for organics..." in the thirteenth sentence.

Add a new fourteenth sentence that reads: "The excavated areas will be backfilled with clean material and wetlands and waterways restored. The wetland functions and values of the original wetlands will be replaced according to state and federal standards, as determined during remedial design."

Response: The changes to the second, eleventh and thirteenth sentences will be made as requested. As discussed under responses to Comment Nos. 57 and 61, the restoration of the functions and values of the original wetlands cannot be ensured. Therefore, the sentences suggested above will be inserted with a minor modification as follows: "The excavated areas will be backfilled with clean material and wetlands and waterways restored. The wetlands functions and values will be replaced *to the extent practicable* according to state and federal standards, as determined during remedial design."

Also, the following sentence will be inserted in the beginning of the description of this alternative: "*All of the groundwater seepage and surface water run on into the site from the adjacent Area A Wetland and Area A Landfill will be diverted to bypass the areas of the proposed excavation and be discharged into downstream culverts.*"

67. Page 8-5, paragraph 2:

Comment: In the first sentence, add "of contaminated sediment, treatment and on-base reuse of contaminated soil," after "treatment and offsite disposal."

Response: The words will be inserted as requested.

68. Page 8-5, paragraph 2:

Comment: In the first sentence after "restoration of the site" add "to its original wetlands functions and values."

Response: As discussed in response to Comment Nos. 57, 61, and 66, the original functions and values cannot be restored. Therefore, the insertions will be made as requested with a modification as follows: "*restoration of the site's wetland functions and values to the extent practicable.*"

69. Page 8-5, paragraph 2:

Comment: Change the second sentence to: "The alternative would comply with chemical-specific ARARs and TBCs, particularly the State of Connecticut Remediation Standards for soils."

Response: The change will be made as requested.

70. Page 8-5, paragraph 2, 5th bullet:

Comment: Change "potentially applicable for treatment of contaminated soil and sediment onsite..." to "applicable for treatment of contaminated soil and sediment onsite by thermal desorption,..."

Add a 6th bullet:

- Federal and State of Connecticut Air Pollution Control Standards (applicable to emissions from the thermal desorption unit).

Response: The word "potentially" will be deleted as requested. A sixth bullet will be added as requested.

71. Page 8-5:

Comment: *Estimated Time for Remedial Action* and cost estimate: This does not appear to include the time and cost for monitoring of the wetland and waterway restoration. Once the details of the remedial plan are resolved this could entail extensive monitoring to ensure that wetland restoration is successful.

Response: As discussed under response to Comment No. 65, the cost associated with additional monitoring to ensure that the wetland restoration is successful will be included in accordance with U.S. EPA Region I guidance. The cost will be changed on page 8-5. The additional monitoring will also increase the length of the remedial action by approximately 5 years. Therefore, the duration of remedial action will also be changed on page 8-5.

72. Page 9-1, Section 9.1.1:

Comment: In the first bullet, change the definition to: "addresses whether an alternative can adequately protect human health and the environment, in both the short- and long-term, from unacceptable risks posed by hazardous substances, pollutants, or contaminants present at the site by eliminating, reducing, or controlling exposure."

Response: The change will be made as requested.

73. Page 9-1, Section 9.1.1:

Comment: In the second bullet, change definition to: "addresses whether an alternative attains applicable or relevant and appropriate requirements under federal environmental laws and state environmental and facility siting laws or provide grounds for invoking a waiver."

Response: The change will be made as requested.

74. Page 9-2:

Comment: Change "which alternative employee..." to "which alternative employ..." in the first bullet.

Response: This correction will be made.

75. Page 9-3, Section 9.2.1, paragraph 1:

Comment: In the second sentence, change "for potential human receptors under the RME scenario and ..." to "for both human receptors, under the Reasonable Maximum Exposure (RME) scenario, and ...".

Response: The change will be made as requested.

76. Page 9-3, Section 9.2.1, paragraph 2:

Comment: Insert "It is unclear whether" before the first sentence.

Response: The U.S. Navy disagrees with this comment. Expressing uncertainty regarding whether Alternative 2 can meet threshold criterion of Overall Protection of Human Health and Environment under

comparative analysis would contradict the detailed analysis. Alternative 2 was retained for detailed analysis because it would meet the threshold criteria. No change proposed.

77. Page 9-3, Section 9.2.1, paragraph 2 (continued):

Comment: Replace with "Restoration of the wetland and waterway would likely be more difficult in Alternative 2 than in Alternative 3 and Alternative 4, because Alternative 2 involves filling the wetlands and waterways above the current wetland elevation" in the last sentence.

Response: The U.S. Navy agrees that the restoration of the wetland and waterway could be more difficult. Careful selection of soil cover material would be required so that high moisture levels suitable for wetland plant species can be maintained, thereby compensating for deprivation of moisture due to filling beyond the levels of the current wetland (groundwater table) elevation at the site. Accordingly, the suggested replacement will be done with the minor modification as follows: "Restoration of the wetland and waterway ~~could~~ ~~would likely~~ be more difficult in Alternative 2 than in Alternative 3 and Alternative 4, because Alternative 2 involves filling the wetlands and waterways above the current wetland elevation"

78. Page 9-3, Section 9.2.1, paragraph 3:

Comment: Change "followed by restoration of the habitat at the site" to "and wetlands and waterways restored. The wetland functions and values of the original wetlands will be replaced according to state and federal standards, as determined during remedial design" in the last sentence. (See also page 9-3, Section 9.2.1, paragraph 4, last sentence.) Before the second sentence, insert "All of."

Response: As discussed under responses to Comments No. 57, 61, 66, and 68, the changes will be made as requested with the exception of the modification to the second sentence, as follows: "The wetland functions and values will be replaced *to the extent practicable* according to state and federal standards, as determined during remedial design."

79. Page 9-4, Section 9.2.3, paragraph 2:

Comment: At the end of the first sentence, insert "if the cap is properly maintained and the monitoring does not indicate exceedances of water quality criteria."

Response: The words will be inserted as requested with a minor modifications of an editorial nature. The words: "if the cap is maintained" will be inserted at the end of the first sentence. The words: " and must be confirmed by monitoring" will be inserted at the end of the second sentence.

80. Page 9-4, Section 9.2.2:

Comment: Delete "TBC-based" in the first sentence of all four paragraphs.

Response: The words will be deleted as requested.

81. Page 9-4, Section 9.2.2, paragraph 2:

Comment: Put "CTDEP's Remediation Standards and" before "PRGs" in the first sentence and delete "TBC-based". In the second sentence, delete "also" and insert "It is unclear whether" at the beginning of the sentence.

Response: The changes to the first sentence will be made as requested. The U.S. Navy disagrees with the comment on the second sentence. The use of a soil cover can minimize the migration of contaminants from contaminated sediments to surface water. However, as noted under long-term effectiveness, because of the need for long-term monitoring and cover maintenance, this alternative is less likely to be a permanent solution for attainment of surface water quality criteria than the other alternatives that employ removal of the sediments. Therefore, no change is proposed under Compliance with ARARs and TBCs.

82. Page 9-4, Section 9.2.2, paragraph 2:

Comment: Change "Protection of Wetlands..." to "federal and state wetlands protection statutes..." in the third sentence. Add to the end of the sentence "if altered wetland functions and values can be restored."

Response: The changes will be made as requested.

83. Page 9-4, Section 9.2.2, paragraph 3:

Comment: Remove "also" before "comply" and put "CTDEP Remediation Standards and" before "PRGs" in the first sentence.

Response: The changes will be made as requested.

84. Page 9-4, Section 9.2.2, paragraph 3:

Comment: Replace the second sentence with "This alternative would comply with all location-specific ARARs, particularly regarding wetlands and coastal zone issues. The proposed excavation and removal will also comply with all action-specific ARARs and TBCs, including protecting waterways, hazardous waste management, and erosion control." In the fourth paragraph, change "and erosion control" to "erosion control, and air pollution control."

Response: The changes to the second sentence of the third paragraph will be made as requested. It is not clear as to what the comment refers to in the fourth paragraph.

Note: In a subsequent e-mail to the U.S. Navy, the U.S. EPA clarified the comment on the fourth paragraph as follows:

Page 9-4, Section 9.2.2, paragraph 4:

Comment: Replace the second sentence with "This alternative would comply with all location-specific ARARs, particularly regarding wetlands and coastal issues. The proposed excavation and removal will also comply with all action-specific ARARs and TBCs, including protecting waterways, hazardous waste management, erosion control, and air pollution control"

Response: The sentence will be replaced as requested.

85. Page 9-5, paragraph 1:

Comment: Replace "reliable" with "permanent" and in the third sentence add "permanently" before "reduced to ..." to the fourth sentence.

Response: The replacement and change will be made as requested.

86. Page 9-5, paragraph 2:

Comment: In the second sentence, change "would be treated and backfilled on base" to "would be either treated and reused on base.". In the third sentence, add "permanently" before "reduced to".

Response: The change and addition will be made as requested.

87. Page 9-5, Section 9.2.4, paragraph 2:

Comment: Change "ponds and streams standing water" to "pond and stream water during construction of the cover."

Response: This description refers to standing water remaining after the inflow to the site has been diverted around the site. Therefore, the term "standing water" is appropriate in order to distinguish the condition at the time of remedial action from "flowing water" that currently exists. No change proposed.

88. Page 9-5, Section 9.2.4, paragraph 3:

Comment: Change "ponds and streams standing water, and dewatering drainage water" to "pond and stream water and dewatering drainage water during the remedial action".

Response: As noted in the previous comment, the term "standing water" is appropriate. No change is proposed.

89. Page 9-5, Section 9.2.4, paragraph 4, second sentence:

Comment: How accurate is the estimate that the 26 tons of solid waste will consist primarily of spent GAC?

Response: The estimate of spent GAC presented in this section refers to the portion of solid waste (i.e. treatment residue) that would undergo reduction of toxicity through treatment offsite. A major portion of the solid waste that would be disposed of offsite without treatment is the spent filter sand from the dewatering bed. The second sentence in the fourth paragraph will be modified as follows for clarity: "Approximately 11,000 cubic yards of soil and portions of highly contaminated sediment containing a total of 2.8 tons of DDTR plus a minor amount of dieldrin would be treated to achieve a minimum of 99 percent removal of DDTR and dieldrin. *This would be* followed by safe disposal/destruction of *these contaminants captured in* approximately 26 tons of GAC during offsite regeneration of spent GAC."

90. Page 9-5, Section 9.2.4, paragraph 4:

Comment: In the third sentence, add "through thermal desorption" before "would be 100 percent irreversible."

Response: The words will be added as requested.

91. Page 9-6, Section 9.2.5, paragraph 2:

Comment: Eliminate the end of the second sentence starting at "and second because ...". The reduction of volume of ponds and wetlands is a permanent impact from the proposed alternative.

Response: The end of the sentence will be deleted as requested.

92. Page 9-6, Section 9.2.5, paragraph 2:

Comment: Change the last sentence to "Attainment of remedial action objectives would be expected once the remedial action is complete in 4 to 6 months, and the disturbed wetland and aquatic habitats are restored."

Response: The change will be made as requested.

93. Page 9-6, Section 9.2.5, paragraph 3:

Comment: Rewrite the second sentence to "There would be disruption of the ecological habitat under Alternative 3 because of ...". Rewrite the next sentence as: "Attainment of remedial action objectives would be expected once the remedial action is complete in 10 to 12 months, and the disturbed wetland and aquatic habitats are restored."

Response: The second sentence will be rewritten to read: There would *also* be a greater disruption of habitat under Alternative 3 than under Alternative 2 because of excavation/dredging of contaminated soil/sediment. The word "also" is required for comparison purposes with other alternatives. The next sentence will be rewritten as requested.

94. Page 9-6, Section 9.2.5, paragraph 4:

Comment: Rewrite the last sentence as: "Attainment of remedial action objectives would be expected once the remedial action is complete in 16 to 24 months, and the disturbed wetland and aquatic habitats are restored."

Response: The sentence will be rewritten as requested.

95. Page 9-6, Section 9.2.6, paragraph 2:

Comment: Insert "somewhat" before "more easily" in the first sentence. Remove the beginning phrase in the second sentence and start with "The remedial activity...". Add a third sentence "There are potential difficulties in restoring lost wetland functions and values within the filled, capped wetland."

Response: The changes will be made to the first and second sentences as requested. The third sentence will be added as requested. A fourth sentence will also be added as follows: "The difficulties in restoring the wetland functions and values can be adequately addressed by a proper choice of soil cover material that would be suitable for wetland plant growth."

96. Page 9-6, Section 9.2.6, paragraph 3:

Comment: Replace "a greater extent of" with "potentially more" in the second sentence and add "and backfilling" after "excavation/dredging".

Response: The replacement and addition will be made as requested.

97. Page 9-7, Section 9.2.7:

Comment: Please ensure that the costs associated with wetlands restoration and monitoring are included in these estimates.

Response: As discussed under responses to Comments No. 65 and 71, additional monitoring to ensure that the wetland restoration is successful will be included in accordance with U.S. EPA Region I guidance.

98. Page 10-1, paragraph 2:

Comment: In (1) remove "standing" before "water from ponds and streams". In (2) where it lists clearing/grubbing, please indicate what will be done with the stumps and other debris which will have contaminated soil/sediment attached? In (3) add "contaminated" before "sediment". In (5) after "top soil cover and revegetation" add "to replace altered wetland functions and values". In (6) after "gravel in stream)" add "and restoration of aquatic habitats".

Response: See response to Comments No. 87 and 88. The term "standing" is required to describe the condition of surface water during remedial action after the inflow to the site has been diverted. No change is proposed.

The following sentences will be added to this paragraph: *"The stumps and other vegetation would be reused by mixing with backfill soil to adjust the soil's organic content to the extent required. The excess would be disposed of at a suitable yard-waste disposal facility or landfill depending on the levels of contaminants and TCLP testing of the soil associated with these materials."*

The other changes will be made as requested.

99. Page 10-1, paragraph 2:

Comment: Please ensure that access to the area to be remediated is restricted.

Response: The description states that fencing and security measures will be maintained during remediation. No further changes proposed.

100. Page 10-1, paragraph 3:

Comment: Remove "standing" before "water" in the first sentence.

Response: See responses to Comments No. 87, 88 and 98. The term "standing" is required to describe the condition of surface water during remedial action after the inflow to the site has been diverted. No change is proposed.

101. Page 10-2, Figure 10-2:

Comment: Please indicate that the spent GAC, the dewatering bed media, and possibly some dewatered solids may go to either a hazardous or nonhazardous facility, depending on TCLP testing. Alternatively, consider deleting Figure 10-2.

Response: A footnote will be added to the figure as follows: *"Spent GAC, dewatering bed media, and dewatered solids will be tested for TCLP and accordingly disposed at a nonhazardous or hazardous waste landfill."*

102. Page 10-3, paragraph 3:

Comment: Remove "Standing" before "water" in the first sentence.

Response: See response to Comments No. 87, 88 and 100. The term "standing" is required to describe the condition of surface water during remedial action after the inflow to the site has been diverted. No change is proposed

103. Page 10-5, paragraph 3:

Comment: Add "tested to determine if hazardous," after "layers will be removed," in the third sentence.

Response: The addition will be made as requested.

104. Page 10-5, paragraph 3:

Comment: Insert a new fourth sentence that reads: "If a portion of the sand/geotextile media contains concentrations of COCs at levels not acceptable at a nonhazardous waste landfill, it will be disposed at RCRA hazardous waste landfill."

Response: The new sentence will be added as requested.

105. Page 10-5, paragraph 4:

Comment: At the end of the first sentence, add a statement about where the grubbed roots will be disposed. If they contain contaminated soil, they must be disposed in a suitable landfill.

Response: The following sentence will be added: *"The grubbed roots will be disposed of at a yard-waste disposal facility after checking to ensure that minimal contaminated soil is associated with the roots, failing which the grubbed roots will be disposed of at a suitable landfill offsite."*

106. Page 10-5, paragraph 4 (continued):

Comment: Add "or other COCs" after "DDTR" in the fourth sentence.

Response: The addition will be made as requested.

107. Page 10-5, paragraph 5:

Comment: Insert a new third sentence - "The wetland functions and values of the original wetlands will be replaced according to state and federal standards, as determined during remedial design."

Response: As discussed under responses to Comments Nos. 57, 61, 66, 68 and 78, the new sentence will be inserted as requested with the exception of the modification, as follows: "The wetland functions and values will be replaced *to the extent practicable* according to state and federal standards, as determined during remedial design."

108. Page 10-6, paragraph 1:

Comment: What is meant by "therefore, no additional measure to restore the topography would be required" in the fifth sentence? Replace with "...excavated sediment and the wetland functions and values of the original waterways will be replaced according to state and federal standards, as determined during remedial design."

Response: As discussed under response to Comments No. 57, 61, 66, 68 and 78, the sentence will be replaced with a modification, as follows: "excavated sediment and wetland functions and values of the waterways will be replaced *to the extent practicable* according to state and federal standards, as determined during remedial design".

109. Pages 11-3 to 11-7:

Comment: Delete "Assessment of" from the title of each table.

Response: The words will be deleted as requested.

110. Page 11-3, Table 11-1, page 2:

Comment: *Synopsis:* Remove "located above the seasonal high water table."

Response: The groundwater protection regulations apply only to soil located above the seasonal high water table. Therefore, no change is proposed.

111. Page 11-3, Table 11-1, page 2 (continued):

Comment: *Action to be Taken:* Replace the second and third sentence with - "Standards for soil remediation within a GB groundwater zone are applicable."

Response: The second and third sentences will be replaced by the following sentence: "Groundwater protection standards are not applicable because the soil contamination at the site appears to occur primarily below the seasonal high water table".

112. Comment: Page 11-4, Table 11-2:

Comment: Restore the ARARs citation to Executive Order 11988, RE: Floodplain Management since some work will be conducted in the coastal floodplain of the Thames River and potentially within areas of floodplain adjacent to the wetlands to be excavated.

Response: The site is not located within the Thames River flood plain. However, the floodplain management citation will be restored because the streams on site may be classified as inland waters.

113. Page 11-5, Table 11-2:

Comment: Change the status of the Connecticut Endangered Species Act from "Applicable" to "Relevant and appropriate" since the listed species have not yet been identified in the project area but could potentially occur.

Response: The change will be made as requested.

114. Page 11-7, Table 11-3:

Comment: Under the "Action to Be Taken" column for the Water Diversion Policy Act, change the first sentence from "remediation is exempt" to "remediation are exempt".

Response: The change will be made as requested.

115. Page 11-8:

Comment: Insert "and potentially migrate" after "to remain on site" in the third sentence.

Response: The following words will be inserted "*and potentially migrate if the cover is not maintained*" after "to remain on site" in the third sentence.

116. Page 11-8, Section 11.4, paragraph 1:

Comment: In the last sentence, change "if" to "because" and change "are" to "will be".

Response: The changes will be made as requested.

117. Page G-1:

Comment: The Glossary does not include all of the abbreviations used. The document may benefit from a Table of Abbreviations in the front of the document. Also, putting it in the front may make it easier for readers to use.

Response: The document will be scanned for terms that are not explained in the text and such terms will be included in the glossary. A Table of Abbreviations will be included after the Table of Contents.

118. Page G-3:

Comment: *Wetlands Functions and Values Assessment:* In (1) remove "animals" and add "wetlands to mammals," before "fishes, birds ..." and in (2) add "the wetlands in supporting" after "useful are" and replace "existing trees and the shrubs for the environment" with "native vegetation."

Response: The changes will be made as requested.