



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1  
JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

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NSB NEW LONDON  
5090.3a

December 3, 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

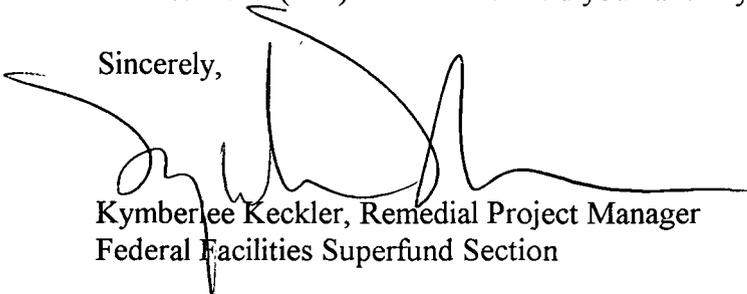
Re: Area A Downstream/OBDA Record of Decision

Dear Mr. Evans:

Thank you for responding to EPA's comments on the Area A Downstream/OBDA Record of Decision in your November 26, 1997 letter. I am concerned that some misunderstandings remain despite numerous discussions to resolve them. Comments requiring additional discussions are provided in Attachment A.

I trust that these issues can be resolved in time to complete the ROD this month. The environmental cleanup of the Area A Downstream/OBDA is an important milestone for EPA, and I look forward to working with you and the CTDEP toward that goal. 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

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT  
Dick Conant, NSBNL, Groton, CT  
David Peterson, USEPA, Boston, MA  
Mary Sanderson, USEPA, Boston, MA  
Patti Lynne Tyler, USEPA, Lexington, MA  
Corey Rich, Brown & Root, Pittsburgh, PA

## ATTACHMENT A

<u>Comment Nos.</u>	<u>Retort</u>
3, 31, 48	EPA agrees that, based on current information, RCRA hazardous wastes are not present within the Area A Downstream/OBDA site. This is reflected in the ARARs tables. EPA modified the language to state “hazardous substances” instead of “contaminants” in order to be consistent with Sections 104, 106, and 120 of CERCLA. Since the contaminants present at the Area A Downstream/OBDA pose unacceptable risks to human health and the environment, EPA construes them to be “hazardous substances.” Please delete the last two sentences from “...It should be noted, however,...” to “...not RCRA hazardous wastes...” since it is not necessary to state this in the ROD in order to document the remedy selection.
4	EPA made a typographical error in its original comment. In the first sentence of the comment, please change “potential human associated” to “potential human receptors associated.”
11	This comment was merely intended to indicate that Section 120 of CERCLA applies to federal facilities and is the most relevant part of the 1986 amendments that are referenced here.
19, 57, 61, 66, 68, 78, 107, & 108	Please delete the phrase “to the extent practicable.” The Clean Water Act (Section 404), the Executive Order 11990 RE: Protection of Wetlands, and the Connecticut Inland Wetlands and Watercourses are all applicable ARARs!
35	EPA’s original comment remains. The last paragraph should be deleted because it conflicts with the bullets above it.
37	EPA’s original comment remains. The last sentence should be deleted because it is too generic. Human studies <i>do</i> exist for some contaminants.
55	Although your response is correct, the mesh biotic barrier was not discussed in as much detail as all of the other layers.
76, 81	EPA’s original comment remains. As you know, EPA continues to believe that there is substantial uncertainty associated with Alternative 2's overall ability to protect human health and the environment. EPA has raised such concerns in meetings, during conference calls, and in its letters dated August 28, 1997 and November 4, 1997. It is critical that the uncertainty

associated with Alternative 2's overall ability to protect human health and the environment be acknowledged in the ROD.

- 87 Please explain in the ROD what is meant by “standing water” in a manner consistent with the descriptions in your response.
- 95 EPA’s original comment remains. The proposed fourth sentence is speculative at best. It is difficult to replace wetland hydrogeology in filled wetlands.
- 98, 105 Contaminated stumps and other vegetation cannot be used as backfill on site. Please do not add the proposed sentences.
- 110, 111 EPA’s original comments remain. Although the Pollutant Mobility Criteria do not apply, other parts of the Remediation Standard Regulations do.
- 112 Streams 5 and 6 are located within the floodplain. Other parts of the site could affect areas within the floodplain because they are hydraulically connected.
- 115 EPA’s original comment remains. EPA questions the adequacy of the cap even if it is properly maintained (*see also* comment numbers 76 & 81).