



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

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NSB NEW LONDON
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January 5, 2004

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 Proposed Plans for the Torpedo Shops soil, the New Source Area soils, and the Basewide Groundwater

Dear Mr. Evans:

Thank you for the opportunity to review the draft proposed plans for the Torpedo Shops soil, the New Source Area soils, and the Basewide Groundwater. Detailed comments are provided in Attachment A, B, and C respectively. For the Proposed Plans for Sites where a CERCLA risk has been identified, there should be a table that illustrates how each alternative meets the seven NCP criteria relative to the other alternatives retained for detailed analysis. EPA recommends that you include such a table.

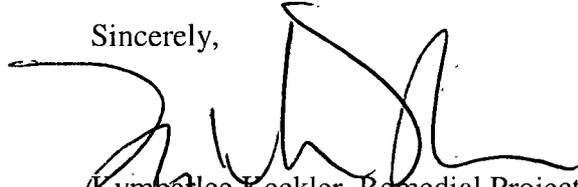
It is EPA's understanding that Operable Unit 9 (OU9) concerns the groundwater resources of the entire Naval Submarine Base. It is inappropriate to limit the Proposed Plan for OU9 to the four sites listed. Please either 1) modify this proposed plan to add all of the other sites and explain how the groundwater will be addressed or 2) explain that this is an interim action and that the remaining sites on the base will be addressed at a later date.

The New Source Area Proposed Plan needs to be revised to reflect that there is no CERCLA risk and that the Navy will issue a No Action ROD under CERCLA, but that the document will discuss the state cleanup action. As per EPA's comments for the FS, all of the text that discusses evaluating the cleanup under NCP criteria should be removed (including discussions of ARARs and 5-year reviews). In particular, page 4 and the Glossary of Terms could be revised to remove all CERCLA/NCP references.

The Torpedo Shop Proposed Plan should be clearer that the risk to groundwater exceeds State standards. The Proposed Plan should also state that the proposed action will address both the CERCLA risks and meet State chemical-specific ARARs.

I look forward to working with you and the Connecticut Department of Environmental Protection to protect human health and the natural resources of the Naval Submarine Base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions or wish to arrange a meeting.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachments

cc: Mark Lewis, CTDEP, Hartford, CT
Melissa Griffin, NSBNL, Groton, CT
Bryan Olson, USEPA, Boston, MA
David Peterson, USEPA, Boston, MA
Bart Hoskins, USEPA, Boston, MA
Chau Vu, USEPA, Boston, MA
Pamela Harting-Barrat, USEPA, Boston, MA
Jennifer Stump, Gannett Fleming, Harrisburg, PA
Corey Rich, Tetra Tech NUS, Pittsburgh, PA

ATTACHMENT A
Torpedo Shops soil

<u>Page</u>	<u>Comment</u>
p. 1, left box	Add "at an offsite location" at the end of the second bullet.
p. 2	Explain how the groundwater component of the Torpedo Shops site will be addressed (<i>i.e.</i> , under the Basewide groundwater ROD where PRGs will be established).
p. 2	In the first sentence under <i>Findings of the Field Investigations</i> , it is not necessary to write "at Site 7" twice.
p. 3, right column	Change "to exposure" to "from exposure" in the second to the last sentence.
p. 3, right column	For RAOs #1 and #4 for the FS, add ".....(1) to protect current receptors (construction worker, employee and trespasser) from incidental exposure....(4) to protect potential future receptors (residential use) from incidental exposure to contaminated soil."
p. 3, right box	Under Alternative S2, explain that soil contamination could migrate to the groundwater and potentially cause human health or ecological impacts.
p. 4, left column	Neither the CERCLA nor the NCP require the selection of alternatives with reasonable costs. Please change the definition of cost to: "Capital costs, annual operation and maintenance costs, and their associated net present values of all alternatives retained for detailed analysis shall be compared."
p. 5	There appears to be a formatting error on this page. Please modify such that the text on page 6 follows the glossary definitions on page 5, and <i>The Public's Role on Alternative Selection</i> is on page 6.

ATTACHMENT B
New Source Area soils

<u>Page</u>	<u>Comment</u>
p. 1	<p>At the end of the second sentence, add “as part of the final ROD for the Basewide Groundwater (Operable Unit 9) Record of Decision (ROD).”</p> <p>At the end of the first paragraph, add a sentence that explains why the remedial action at this site was not addressed during the excavation of the adjacent Area A Downstream.</p> <p>In the third paragraph, explain that the proposed remedy is “No Further Action” under CERCLA, but that a cleanup will occur under the RSRs. In the second sentence, change “excessive” to “unacceptable” to be consistent with the rest of the document and strike the word “potentially.”</p>
p. 2	<p>It was surprising to EPA to hear that the Navy believes that Site 3 covers approximately 75 acres. The description of Site 3 in the FFA only concerns the OBDA. Please make it clearer that the 0.06 acres of the NSA and the approximately 9 acres of the Area A Downstream/OBDA only represent a fraction of Site 3 and other parts will be addressed at a later date. Alternatively, the NSA could become a new Operable Unit (11).</p> <p>In the second to the last sentence, it is not accurate to state that the remedial action was completed. While the excavation was completed, the remedial action will not be considered complete by EPA until the wetlands are restored.</p>
p. 3, right column	<p>Since the proposed remedy is “NFA under CERCLA with cleanup under State program” because the risks are acceptable, CERCLA terms, such as RAOs should not be used herein.</p>
p. 3, right column	<p>In the paragraph under "Summary of Alternatives Considered for Site 3 - NSA Soil", for RAO #1 for FS: add ".....(1) to protect current receptors (construction workers, employees and trespassers) from incidental exposure to contaminated soil,....."</p>
p. 4, left box	<p>Five year reviews are not required when site risks are acceptable. Please add to the comment column of S1, that soil TPH levels exceed State standards.</p>
p. 4, right column	<p>Please modify the text to explain that the proposed remedy is “NFA under CERCLA with cleanup under State program.” Explain that cleanup will occur because of high soil TPH concentrations (exempt from CERCLA).</p>

ATTACHMENT C
Basewide Groundwater

<u>Page</u>	<u>Comment</u>
p. 1	Explain how the groundwater resources at remaining areas will be addressed.
p. 1	Under "The Cleanup Proposal" box, add at the end of the second bullet: "to a level where unrestricted use of the groundwater may be permitted."
p. 2	Modify the second sentence to read "In addition, federal regulations require that all significant comments be responded to [40 C.F.R. §300.430(f)(3)(i)(F)]."
p. 2	After "Responsiveness Summary," add "that is usually attached to the Record of Decision (ROD) ."
p. 3	In the second paragraph under <i>Findings of the Field Investigations</i> , it is inappropriate to state that "a continuing source of contamination is not present and that natural attenuation processes are working." There are too few samples, the source control at site 7 has not occurred, and degradation products have not been detected. Please remove this section of the sentence.
p. 3, last ¶	Change "natural attenuation" to "natural degradation" and modify the term in the glossary accordingly.
p. 4, right column, ¶2	Please explain what changes were made after "Changes in the methodologies for risk assessment, sample analysis, and sample collection all contributed to the change."
p. 5, left column	In the PRGs table, under "SVOCs": change to "Hexachlorobenzene (Site 7)"
p. 5, right column	For RAOs #1 and #2 for the FS: add ".....(1) to protect current receptors (construction workers) from incidental exposure.....(2) to protect potential future receptors (potable water supply) from exposure to....."
p. 5, last ¶	Change the title of GW1-2 by removing "Natural Attenuation with."
p. 6	Change the titles of GW1-2 and GW2-2 in the Tables by removing "Natural Attenuation with."
p. 6	In the Tables under the Components and Comments Sections for GW1-2 and GW2-2, change "attenuation" with "degradation."

- p. 6, ¶ Change the title of GW2-2 by removing “Natural Attenuation with.”
- p. 7, left column Neither the CERCLA nor the NCP require the selection of alternatives with reasonable costs. Please change the definition of cost to: “Capital costs, annual operation and maintenance costs, and their associated net present values of all alternatives retained for detailed analysis shall be compared.”
- p. 7, right Column Change “the selected alternative” to “the proposed alternative.”
- p. 7, right column In the last sentence of the second bullet, it is inappropriate to state that monitoring activities will be required for decades. An appropriate risk management decision, which could include more active groundwater treatment, will be made by the Navy, CTDEP, and the EPA at a later date.
- In the second sentence, remove “Natural Attenuation with.”
- p. 7 In the first bullet under “The Navy's Proposed Remedy,” add language from EPA’s comments on the FS regarding property transfer; “In the event of property transfer and with confirmation that contaminated groundwater remain at the site, a deed notification will be used to prohibit the use of groundwater.”
- p. 8 There appears to be a formatting error on this page. Please modify such that the text on page 9 follows the glossary definitions on page 8, and *The Public’s Role on Alternative Selection* is on page 9.
- p. 9 Remove the paragraph regarding “Natural Attenuation.”