



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

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NSB NEW LONDON
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May 18, 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: New Source Area Record of Decision

Dear Mr. Evans:

Thank you for the opportunity to review the New Source Area Record of Decision (ROD). EPA's primary concern is that the ROD accurately document the selected remedy under Superfund. Currently, the ROD does not clearly state that the selected remedy is No Further Action (NFA) under Superfund, but that an action will be taken under State regulatory authority (e.g., Sections 1.4 and 2.12). Detailed comments are provided in Attachment A.

I look forward to working with you and the Connecticut Department of Environmental Protection to protect the environs of the Naval Submarine Base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT
Melissa Griffin, NSBNL, Groton, CT
Bryan Olson, USEPA, Boston, MA
David Peterson, USEPA, Boston, MA

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ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 1-1, §1.4	Expand this section to explain that NFA is the selected remedy under CERCLA with a cleanup under State authority.
p. 1-2, ¶5	Since there is no unacceptable risk under CERCLA, please remove the language concerning the statutory preference for treatment and reword the rest of the paragraph.
p. 1-2, ¶6	Replace “allow for” with “pose a risk from.”
p. 2-20, ¶5	There is no mandatory 5-year review for this area because there is no CERCLA risk. There will be ongoing 5-year reviews for the entire base, however.
p. 2-23, ¶4	Please correct the first sentence. There is no periodic site review required (see previous comment).
p. 2-23, ¶6	Please correct the second sentence as no periodic inspections are required.
p. 2-25, §2.10.2	There are no ARARs for a non-CERCLA cleanup. I recommend that you change the title of the tables to “Statutory and Regulatory Requirements.”
p. 2-27, §2.12	Expand this section to include the NFA language used in Section 1.2 on page 1-1.
p. 2-31, §2.13.5	Since there is no unacceptable risk under CERCLA, please remove the language concerning the statutory preference for treatment.
Tables 2-10 to 2-13	There are no ARARs for a non-CERCLA cleanup. I recommend that you change the title of the tables to “Statutory and Regulatory Requirements.”