



**STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



March 9, 1994

Mr. David Miu
NORTHNAVFACENCOM, Code 1823/DM
10 Industrial Way
Mail Stop 82
Lester, PA 19113-2090

Re: Interim Remedial Action Work Plan, Defense Reutilization and Marketing Office.

Dear Mr. Miu:

Staff of the Permitting, Enforcement and Remediation Division of the Connecticut Department of Environmental Protection have reviewed the work plan titled "Work Plan Interim Design, Defence Reutilization and Marketing Office", dated November 11, 1993. The work plan was prepared by Atlantic Environmental Services, Inc. on behalf of North Division Naval Facilities Engineering Command. Listed below are staff comments pertaining to the work plan:

General Comments

1. Permits

On November 18, 1993, representatives from Atlantic Environmental Services Inc. met with DEP representatives to discuss requirements for conducting work at the Defence Reutilization and Marketing Office (DRMO). At that meeting, it was recognized that generally, pursuant to CERCLA and the National Contingency Plan, the Navy would not be required to obtain permits for on-site work. The Navy, however, is responsible for submitting information for Departmental review to ensure identification of and compliance with State standards, requirements, criteria, or limitations that would otherwise be included in a permit. The Interim Design Work Plan must include provisions for identifying activities that would normally require DEP approval or permits, and list the appropriate information that would be submitted to ensure compliance with DEP regulations. These activities include but are not limited to the following:

1. transportation and disposal of hazardous waste,
2. on-site treatment of hazardous waste,
3. on-site re-use of treated hazardous waste,
4. activities in or near coastal area management zones,
5. air emissions emanating from a treatment unit
6. any discharge to the waters of the State of Connecticut.
7. clean-up criterion and goals of soils and ground water

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2. Additional Data

It is our understanding that additional data has been collected to further define the nature and extent of contamination at the DRMO. The State reserves final comment on the appropriateness of the Interim Remedial Action (IRA) until this data is provided.

3. Clean-up Standards

The Department is currently developing regulations that specify the standards for the clean-up of sites where hazardous wastes have been disposed of, or other pollutants have been released to the environment. These regulations will be formed based on the draft clean-up standards attached to this letter. The State requests that these draft regulations be utilized in terms of the current remedial objectives for the DRMO area and other sites within the Naval Submarine Base. The State recognizes that the regulations have yet to be adopted and therefore are not enforceable. However, adherence to the clean-up standards is consistent with the State's goal of eliminating or minimizing sources of pollution, eliminating risks to human health and restoring water quality consistent with the State's water quality standards.

Specific Comments

4. Section 2.3 Nature and Extent of Contamination

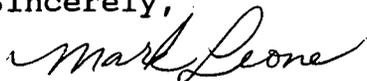
- a. pg. 16, paragraph 1 - It is noted that 21 of the 24 TCLP samples exceeded "To Be Considered" (TBC) values. Please indicate the TBC values used to make this determination.
- b. pg. 18, paragraph 2 The IRA proposal specifies a chemical specific TBC concentration of 2 ppm for Polychlorinated Biphenyls (PCBs). Although the EPA TSCA guidance level specifies 10 ppm for soil clean-up, in a residential unlimited access area, as the "Applicable or Relevant and Appropriate Requirement" (ARAR), the Navy has committed to defining the extent of PCB contamination that exceeds 2 ppm within the Area "A" Landfill. The Department requests that PCB contamination exceeding 2 ppm is delineated within the DRMO area and subsequent IRA area submittals.

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- c. pg. 18, paragraph 3 - The preliminary IRA target level for lead is 1000 ppm. The basis for this decision is predicated on the assumptions that the area will be capped and long term maintenance and groundwater monitoring will occur at this site. Any soil or ground water clean-up in this GB/GA area must comply with the Connecticut drinking water clean-up standard of 0.05 ppm for Lead. Please indicate what measures or provisions the Navy will utilize for interim site access control, minimizing long term disturbance or development, and controlling potential ground water migration in the DRMO area.
- d. pg. 19, paragraph 1 -The Summer's model, which was used to develop the IRA target level of 1.4 ppm for trichloroethene (TCE), conflicts with both EPA maximum concentration levels (MCLs) and the State action levels of 5 ppb for this contaminant.

If you have any questions in regards to these comments please do not hesitate to contact me at (203) 566-5486.

Sincerely,



Mark Leone
Environmental Analyst
Bureau of Water Management
Permitting, Enforcement, & Remediation Division

MRL: mrl

ATTACHMENTS

cc: Barry Giroux, Atlantic Environmental Services, Inc.
Paul Marchessault, EPA