

**STATE OF CONNECTICUT**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**



July 26, 1994

Mr. Mark Evans, RPM  
NORTHNAVFACENGCOM, Code 1823/DM  
10 Industrial Way  
Mail Stop 82  
Lester, PA 19113-2090

Re: Focused Feasibility Study, Defense Reutilization and  
Marketing Office (DRMO).

Dear Mr. Evans:

Staff of the Permitting, Enforcement and Remediation Division (PERD) of the Connecticut Department of Environmental Protection (CTDEP) have reviewed the work plan titled "Focused Feasibility Study (FFS), Defence Reutilization and Marketing Office", dated March 11, 1994. The FFS was prepared by Atlantic Environmental Services, Inc. (Atlantic) on behalf of North Division Naval Facilities Engineering Command (NORTHDIV). These comments supplement the preliminary comments provided to NORTHDIV in a letter dated May 31, 1994. Listed below are the additional staff comments pertaining to the work plan:

**General Comments**

While CTDEP staff found the selected interim remedial action consisting of hot spot removal and subsequent capping of the DRMO site to be reasonable, several concerns were identified. The selected interim action only partially addresses source removal. It does not address the potential impacts of remaining saturated wastes on ground water quality, surface water quality, wetlands, and the Thames River.

CTDEP is concerned that contaminants remaining under the cap, will continue to leach into the ground water due to seasonal and tidal fluctuations in the water table at this site. Please provide a plan of action to address this concern and the likelihood of additional source removal.

Ground water contamination at this site has not yet been fully characterized and it is understood that further remedial action is warranted. As reported in both the FFS and the most recent Technical Review Committee (TRC) meeting, a scope of work for a proposed ground water investigation has been developed. CTDEP requests that both an updated schedule for the completion of this investigation and any plans for implementation of a ground water remediation program be provided by NORTHDIV to us for review.

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Although the EPA Toxic Substance Control Act (TSCA) guidance specifies a concentration of 10 ppm for soil clean-up of Polychlorinated Biphenyls (PCBs) in a residential unlimited access area as the "Applicable or Relevant and Appropriate Requirement" (ARAR), a chemical specific To-Be-Considered (TBC) concentration of 2 ppm exists for PCBs. NORTHDIV has proposed a compromise which entails the removal of soil hot spots contaminated with PCBs at the DRMO to 10 ppm, with the understanding that the remaining PCB contamination under the capped area would average 2 ppm. This remains acceptable to CTDEP provided that, in addition to the removal of hot spots, all PCB contaminated soils exceeding 2 ppm are beneath a cap. CTDEP's acceptance of this remedial alternative is predicated on the assumption that not only will the area be capped, but that long term maintenance and ground water monitoring will also take place at this site.

**Sp cific Comments**

Page 22, paragraph - 1

Please provide information regarding the current schedule for the ground water investigation at the DRMO.

Page 26, paragraph - 4

As noted here, the CTDEP Contaminated Soils Removal and Disposal Guideline, circa 1984, was a guidance document only, and has not been used for some time. Currently the State is using the Proposal for the Connecticut Clean Up Standard Regulations dated April, 1993 to determine appropriate remediation goals. 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.

Page 48, paragraph - 5

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.

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Page 50, paragraph - 5

A target level of 500 ppm for the remediation of soils contaminated with lead at the DRMO was proposed by EPA at the May 6, 1994 meeting. This compromise between the 1000 mg/kg favored by the Navy and the 15 ppb Toxicity Characteristic Leachate Procedure (TCLP) result requested by CTDEP, remains acceptable to CTDEP only in the instance that all soils exceeding this number (500 ppm) be included within the cap. The basis for this decision is predicated on the assumptions that long term maintenance and groundwater monitoring will occur at this site.

Page 51, paragraph - 3

The report states that DDT contamination above the TBC levels is isolated to two locations (at the DRMO) and is not present in concentrations that pose unacceptable hazards to human health or the environment. Please list the concentrations of DDT found and the comparison levels used to make this determination.

Page 57, paragraph - 4

Any changes of the ground water classification at the DRMO are subject to the terms listed on page 34, paragraph 35 of the CTDEP Water Quality Standards as adopted, January, 1992; which state that such changes must be justifiable based upon overriding economic or social needs, and will not interfere with any existing or presently possible uses of such waters or adjacent surface waters. You may wish to review the attached copy of the referenced document. Formal application for a ground water re-classification may be made through the Commissioner of CTDEP.

Page 57, paragraph - 5

Institution of alternate concentration levels (ACLs) is not appropriate at this site. As stated in the EPA Guidance on the Use of ACLs under CERCLA, establishment of ACLs require the consideration of the potential for degradation products, particularly those presenting a greater risk than the parent product (eg. TCE to the more toxic vinyl chloride). The FFS does not provide adequate justification of the use of ACLs at this site.

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Page 85, paragraph - 2

Dewatering and dredging will require that the substantive requirements of CTDEP permits be adhered to; i.e., (plans showing sediment and erosion controls and impacts to surface waters). Please contact Call Sally Snyder of the CTDEP Inland Water Resources Division (IWRD) prior to instituting these activities at (203) 566-7280 to confirm the appropriate requirements.

Page 114, paragraph - 2

Please correct "water generated by these operations is estimated to be from 15 to 45 ppm" to "15 to 45 gpm".

Page 116, paragraph - 1

Dredging activities and the discharge of dewatering filtrate conducted entirely on site may be exempt from the administrative requirements of permits, but please be advised that substantive requirements of Connecticut statutes and regulations are applicable.

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

Sincerely,

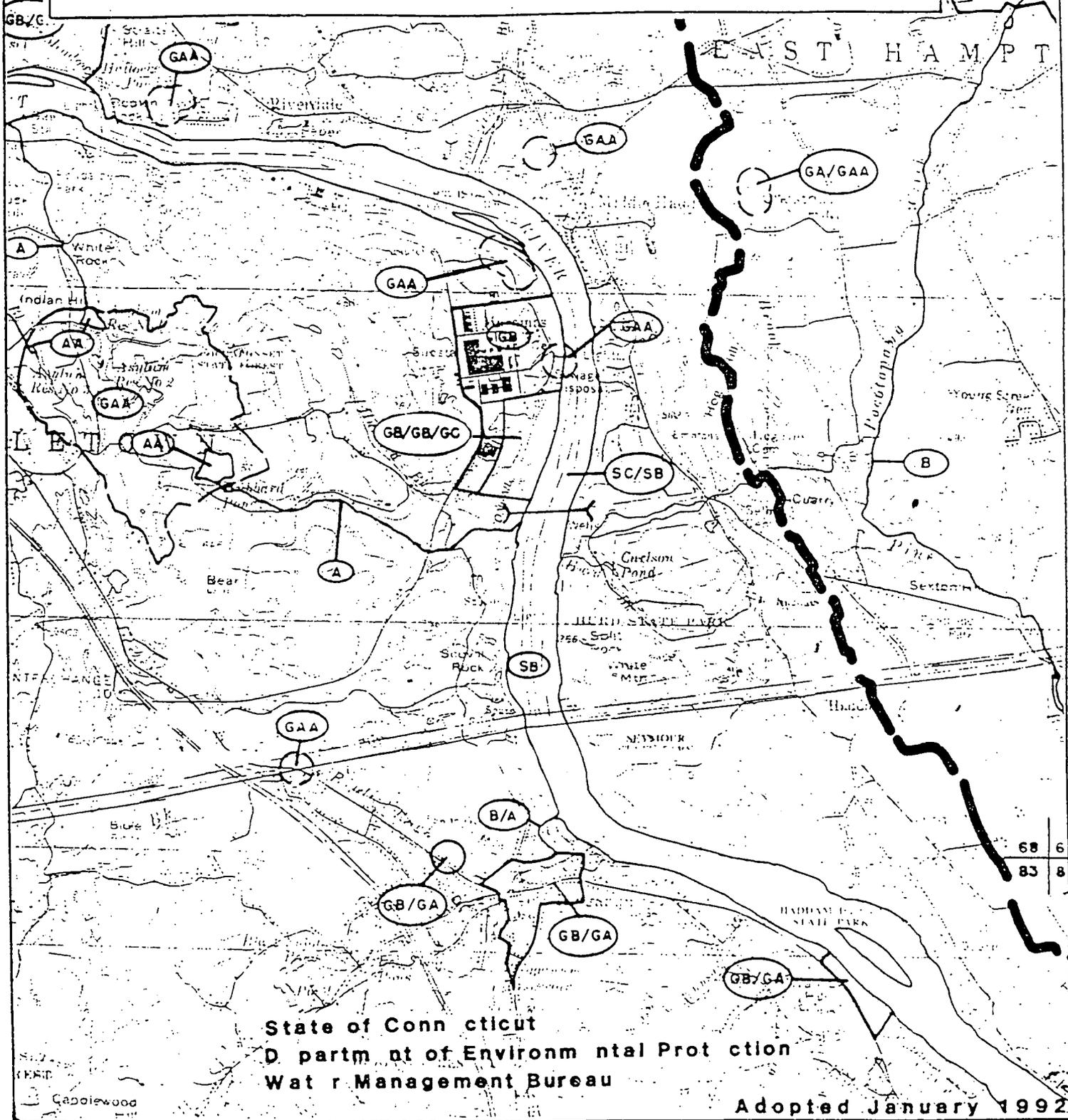


Mark Leone  
Environmental Analyst  
Bureau of Water Management  
Permitting, Enforcement, & Remediation Division

MRL: mrl

cc: Barry Giroux, Atlantic Environmental Services, Inc.  
Christine Williams, EPA Region 1

# Water Quality Standards



#### IV. GROUND WATERS STANDARDS

33. The goal of the Commissioner is, wherever feasible, to restore or maintain all ground waters to a quality consistent with its use for drinking without treatment. In keeping with this goal, all degraded ground waters shall be restored to the extent possible to a quality consistent with Class GAA or GA. However, attainment of Class GAA or GA quality may not be sought when:
- A) The ground water is in a zone of influence of a permitted discharge in a Class GAA or GA area.;
  - B) The ground water goal is designated as Class GB; unless there is a demonstrated need to restore ground waters to Class GA or where it can be demonstrated to the Commissioner that restoration to Class GA cannot be reasonably achieved;
  - C) The ground water goal is designated as Class GC.
34. Ground waters with existing quality better than established standards for that Class will be maintained at their existing high quality. Any applicant for a new discharge to such waters may be required to demonstrate to the Commissioner that the discharge is justifiable due to overriding economic or social needs. The Commissioner may require a level of treatment which will result in water quality exceeding Federal and State Potable Water Supply Criteria. Other special treatment requirements deemed necessary to prevent pollution and which will maintain existing uses made of, or presently possible for such waters, may also be required.
35. Ground waters shall not be lowered in Class designation unless and until it has been affirmatively demonstrated to the Commissioner such change is justifiable due to overriding economic or social needs and will not interfere with or become injurious to any existing use made of or presently possible in such waters or that of adjacent surface waters. Any applicant requesting a change in a water quality classification will be required to demonstrate to the Commissioner the proposed new Class designation is consistent with all such uses.
36. Discharges to ground water shall be limited in conformance with the following:
- (A) Class GAA Ground Waters: permits may be granted for discharges of domestic sewage as defined in Section 22a-430-1 of the regulations of state agencies or wastes from acceptable agricultural practices or backwash from public drinking water treatment systems or other minor cooling or clean water discharges.
  - (B) Class GA Ground Waters: permits may be granted for those discharges permitted in Class GAA areas and septage disposal or disposal of other wastes of predominantly human or animal origin. These ground waters