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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

August 5, 1994

Mark Evans, RPM
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

RE: Time Critical Removal Actions at the DRMO and Spent Acid Disposal Area at the Naval Submarine Base-New London, Groton, Connecticut

Dear Mr. Evans:

This letter is in response to the Navy's proposal to exercise its authority to perform time-critical removal actions at the DRMO and the Spent Acid Disposal Area located at the Naval Submarine Base-New London in Groton, Connecticut. Since May, the Navy has pursued several different strategies for addressing contamination in those areas including submittal of a focused feasibility study and consideration of a non-time-critical removal action. The current proposal to perform a time-critical removal raises several important questions.

The Region appreciates the Navy's preference for taking immediate action. The Region, too, operates with a bias for action. But remedial action of any sort other than in an emergency must be based on adequate documentation available to the public in an administrative record. The process for creating a feasibility study is well established. The process is described fully in the NCP as well as in guidance available to the public.

The feasibility studies submitted to the Region in May were of very poor quality and inadequate to support any action at the Site. The Region has given the Navy extensive comments indicating that a major rewriting is necessary to produce acceptable documents. Had the feasibility studies been acceptable, by now the Navy would have been well along in the remedy selection process. Instead, it has been necessary to focus attention on gaps in the data and to determine if any sort of interim action is appropriate.

Although the Region supports the Navy's effort to act quickly, it is necessary to strike a balance between the timely use of resources and the quality of both the remedial investigation and the administrative record. In considering such a balance, the Region believes for several reasons that the Spent Acid Disposal Area lends itself more readily to a removal action than does the DRMO site. Since the site is upland and away from the Thames River, there are fewer concerns about interaction between the

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groundwater and the river. Secondly, the Navy has not set a lower limit on the depth of soils to be removed at the Spent Acid Disposal Site while at the DRMO the Navy has proposed only a 3 foot removal depth. And thirdly, the Navy has agreed to a cleanup level of 500 ppm for lead in the contaminated soil while at the DRMO the regulators have not yet agreed to the soil cleanup goals.

EPA has serious concerns regarding several outstanding issues at the DRMO. Because the scrap metal area in the northern portion of the DRMO site has not yet been characterized, it is not known whether that area should be included in the planned removal action. Also, the extent of the interaction between the groundwater and the river has not been taken into account in planning for the excavation of the soil. In addition, the proposed chemical specific cleanup levels have not yet been agreed to by the regulators. And finally, EPA is troubled greatly by the significant volume of contamination that will be left in the saturated zone. The Navy must address that contamination in the next phase of the RI/FS process.

If despite all of the above mentioned issues, the Navy is still prepared to move ahead with the proposed partial source control removal actions for both sites, EPA expects the Navy to follow the requirements of Section 12.5 of the Federal Facility Agreement recently negotiated between the three parties. It is also essential that the proposed removal actions be consistent with the final remedies chosen for those two sites. Since it is not yet possible to determine the final remedies due to the lack of hydrogeological data, the proposed removal actions should include temporary covers rather than any sort of permanent capping.

I look forward to discussing these issues with you and the CT DEP at your earliest possible convenience. Please call me at (617) 573-5736 to arrange a meeting.

Sincerely,

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc. Mark Lewis, CT DEP
Andy Stockpole, NLNSB
Bob DiBiccaro, EPA
Rona Gregory, EPA
Kymberlee Keckler, EPA
Mary Sanderson, EPA
Patti Tyler, EPA
Dan Winograd, EPA
Dale Weiss, TRC