



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER MANAGEMENT
PERMITTING, ENFORCEMENT & REMEDIATION DIVISION
FEDERAL REMEDIATION PROGRAM



May 28, 1997

Mr. Mark Evans
U.S. Department of the Navy
Northern Division, Naval Facilities Engineering Command, Code 1823
10 Industrial Way, Mail Stop 82
Lester, PA 19113-2090

Re: State Comments Regarding the Draft *Feasibility Study for Defense Reutilization and Marketing Office, Naval Submarine Base New London, Groton, Connecticut*

Dear Mr. Evans:

Thank you for the opportunity to review the draft "*Feasibility Study for Defense Reutilization and Marketing Office, Naval Submarine Base New London, Groton, Connecticut*". This document was dated February 1997 and was received by the Department on March 5, 1997. It was prepared by Brown and Root Environmental on behalf of the Northern Division Naval Facilities Engineering Command. Our comments regarding this document are listed below. All references to RCSA mean the Regulations of Connecticut State Agencies.

General Comments

In general the report adequately considers the various alternatives for remediating the contamination at the DRMO. However, I am concerned that the report does not adequately consider the requirements of the State's Remediation Standard Regulations. In particular, the report inappropriately dismisses the requirement to comply with the Pollutant Mobility Criteria, or with an acceptable alternative.

1. Pollutant Mobility Criteria

The report identifies a number of pollutants which are present in soil at concentrations in excess of the Pollutant Mobility Criteria. However, the report states that since these substances are not present at unacceptable concentrations in ground water, and the ground water is not used for drinking, these exceedances are not of concern. Instead, soil concentrations which would be protective of surface water are derived. This is unacceptable because soil concentrations which are protective of surface water would not necessarily also be protective of ground water.

The GB Pollutant Mobility Criteria apply to soils at this site regardless of the fact that the ground water is not used for drinking, and that soil contaminants present in soils at levels exceeding the Pollutant Mobility Criteria have not been found at unacceptable concentrations in site ground water.

DRMO Feasibility Study
State of Connecticut Comments
May 28, 1997
Page 2 of 6

The State considers soil contamination at concentrations in excess of the Pollutant Mobility Criteria to be a potential source of pollution to the waters of the State, regardless of whether the contaminants are presently being detected in ground water.

2. The State's Preferred Alternative

The State would prefer that a permanent remedy, such as excavation of contaminated soil above the water table, be implemented at this site. The Commissioner is directed by CGS §22a-133k to give preference to permanent remedies in establishing standards for cleanup of hazardous waste sites. The Remediation Standard Regulations do so by requiring approval for use of engineered controls. When the Time Critical Removal Action was proposed in 1994, the State did not agree that installing an engineered control (RCRA cap) at this site was an appropriate time critical removal action. Even though the Navy went ahead and installed the RCRA cap, the use of an engineered control can only be approved for this site if the Navy can demonstrate in accordance with RCRA §22a-133k-2(f)(2)(A)(iv) that (aa) the cost of remediating the polluted soil at such release area is significantly greater than the cost of installing and maintaining an engineered control for such soil and conducting ground-water monitoring, and (bb) that the significantly greater cost outweighs the risk to the environment and human health if the engineered control fails to prevent the mobilization of a substance in the soil or human exposure to such substance. Implementation of either Alternative 3- Hot Spot Excavation, Offsite Disposal, Institutional Controls, and Monitoring, or Alternative 4- Excavation, On-Site Treatment, and Offsite Disposal of Contaminated Soil is preferred by the State. Compliance with the Remediation Standard Regulations, including the Direct Exposure and Pollutant Mobility Criteria is necessary regardless of which alternative is eventually selected. Section 22a-133k-2(f)(2)(B) describes the information required to accompany the request for use of an engineered control.

3. ARARs

The State agrees that the ARARs cited in the Feasibility Study, except as noted below in Specific Comments 6, 7, and 13 are correctly identified. However, some additional laws and regulations are also Applicable or Relevant and Appropriate. A complete list of State ARARs is attached.

Specific Comments

4. Page 1-10 Section 1.2.8.1 Groundwater Quality

A map depicting the location of the public water supply wells referenced in the text would be useful.

5. Page 1-10 Section 1.2.8.2 CTDEP Groundwater Classifications

Please revise the text to note that the Navy's application to reclassify the ground water to GB has

DRMO Feasibility Study
State of Connecticut Comments
May 28, 1997
Page 3 of 6

been approved. This comment applies also to Section 2.1.3 on page 2-4, to the last paragraph on page 2-11, and to the third paragraph of Section 2.1.4.2 on page 2-16.

6. Pages 2-5 to 2-7 Table 2-1 Assessment of Chemical Specific ARARs

It would more convenient for the reader if all Chemical Specific, Location Specific, and Action Specific ARARs were presented in one place, rather than being scattered throughout this section.

Please correct the citation for the State's Pesticide Control Regulations on page 2-7. The proper citation for these regulations is RCSA § 22a-50-1 to 8, 22a-66-1 to 4, and 22a-66a-1 to 2. These regulations were incorrectly cited by me in some ARARs tables which I have sent to the Navy in the past. The Navy may wish to make these changes in any master table of ARARs which may have been used to generate the ARARs tables in this report. I agree, however, that these regulations are not an ARAR.

The full citation for the State's Air Pollution Control Regulations is RCSA §§ 22a-174-1 through 29. Please make this correction on page 2-7. Sections 22a-174-3 and 22a-174-29 in particular provide specific numerical limits on a wide variety of pollutants, although numerical limits are also contained in other subsections of section 22a-174.

The discussion regarding the State's Water Pollution Control Standards requires revision. Water Pollution Control Statutes which should be cited include CGS § 22a-430, which prohibits discharging to the waters of the State without a permit, and CGS § 22a-430b, which allows the Commissioner to issue general permits for many types of discharges. Both of these would be more properly cited as Action Specific ARARs. The Remediation Standard Regulations were adopted pursuant to the requirements of CGS § 22a-133k. They provide more specific guidance regarding the general policies and goals of the State's Water Quality Standards. The Water Quality Standards were adopted pursuant to CGS §22a-426.

7. Pages 2-8 to 2-9 Table 2-2 Assessment of Location- Specific ARARs and TBCs

Please correct the citation for Connecticut's Coastal Management Act. The proper citation is CGS § 22a-90 to 112. It should be noted that the entire portion of the base within the Town of Ledyard is within the area designated by the Town as within the Coastal Zone.

8. Page 2-12 Section 2.1.4.1 Soil Contaminants of Concern

The report lists substances which were detected in soil at concentrations in excess of the GB Pollutant Mobility Criteria. However, this concern is dismissed in the second paragraph since ground water at the DRMO is not used and these contaminants are not present at unacceptable concentrations in ground water. Instead, soil concentrations which would be protective of surface

DRMO Feasibility Study
State of Connecticut Comments
May 28, 1997
Page 4 of 6

water are derived. While it may be useful to calculate soil concentrations which would be protective of surface water, such values are not enforceable standards under the Remediation Standard Regulations. Compliance with the provisions of the Regulations regarding the Pollutant Mobility Criteria is required regardless of whether surface water is threatened.

It is not appropriate to dismiss contaminants which exceed GB pollutant mobility criteria based on these factors. Soils which contain contaminants at concentrations in excess of the pollutant mobility criteria constitute a potential source of pollution to the waters of the State. This is true regardless of whether the ground water is used for drinking or whether the contaminants have been detected in ground water. The Regulations provide a number of ways to calculate alternative Pollutant Mobility Criteria, or to apply alternative dilution or dilution and attenuation factors. In addition, the regulations provide for the use of engineering controls, such as engineered caps, under certain circumstances. All of these alternatives are based on protecting ground water. A pollutant mobility criterion based on protection of surface water would not necessarily be protective of ground water resources.

9. Page 2-13 Section 2.1.4.1 Soil Contaminants of Concern

The second paragraph states that the regulations allow for a maximum dilution factor of 100 when calculating an alternative Surface Water Protection Criteria. The regulations do not actually specify a maximum dilution factor. Given a receiving water body with a sufficiently large flow under 7Q10 conditions, dilutions factors in excess of 100 might be allowable. The report also states that the actual dilution factor, "based on minimum freshwater flows from the Shetucket and Yantic Rivers" is 266. Is this calculation based on 7Q10 flow conditions, as specified in Section 22a-k-3(b)(3)(A) of the Regulations? The State does not object to the use of a dilution factor which is less than the actual factor, provided that the calculations are performed in accordance with the Regulations.

This comment applies also to the last paragraph on page 2-16.

10. Page 2-21 Section 2.2.1.3 PRGs for the Protection of Surface Water

This section provides further discussion on the derivation of soil cleanup levels which would be protective of surface water. It states that allowable soil concentrations were calculated by "taking the ratio of the maximum SWPC divided by the MCL or HBL and multiplying by the Federal Pollutant Mobility Criteria. As discussed above, this approach is unacceptable because it does not address potential threats to ground water.

11. Page 2-23 Table 2-7

The last column lists "Alternate Pollutant Mobility to be Protective of the Surface Water" as an ARAR. As discussed above in my comment regarding page 2-13, this is not appropriate. If alternate

DRMO Feasibility Study
State of Connecticut Comments
May 28, 1997
Page 5 of 6

Pollutant Mobility Criteria are to be used, they must be calculated in accordance with the requirements of the Remediation Standard Regulations.

12. Page 2-26 Section 2.4 Estimated Volumes of Contaminated Media

This section provides estimates of the volume of soil which would need to be excavated to comply with preliminary remediation goals based on both the current industrial land use, and on future residential land use. No calculations based on the pollutant mobility criteria are provided. For this reason, it is likely that the volume estimates are not representative of actual conditions.

13. Page 2-27 to 2-30 Table 2-8 Assessment of Action Specific ARARs and TBCs

Please correct the citation to the State's Solid Waste Management Regulations on Page 2-29. The correct citation is RCSA § 22a-209-1 to 15. In addition, Section 22a-208a through 208c of the State's Solid Waste Management Statutes should be cited as Relevant and Appropriate. This statute requires a permit for construction, alteration or operation of a solid waste management facility, or to receive, dispose of, process or transport solid waste in a solid waste facility, volume reduction plant, solid waste disposal area, recycling facility, recycling center, transfer station or biomedical waste facility.

The Regulations for the Well Drilling Industry should be cited as Applicable, since they would apply to any monitoring wells or test borings installed or performed on the site. The statutes regarding registration and permitting of wells and well drillers (CGS §25-126 to 131) should also be cited as applicable. These statutes require that well drillers be registered and permits and fees are required for each water supply well drilled. Separate registrations apply to water supply and non- water supply wells. Permits are not required for non water supply wells. However, the driller must file a completion report for both water supply and non- water supply wells.

CGS Section 22a-430 should also be cited on page 2-30. This statute prohibits discharge to the waters of the State without a permit.

A citation should also be provided for the State's Water Quality Standards. These standards were adopted pursuant to CGS § 22a-426.

14. Page 5-6 Section 5.2.2.1- Alternative 2- Detailed Description

Institutional controls proposed include maintaining records of the location of the contamination in Navy real estate records and in the Base Master Plan. The State would also require that Environmental Land Use Restrictions in the form prescribed by the regulations be recorded.

DRMO Feasibility Study
State of Connecticut Comments
May 28, 1997
Page 6 of 6

15. Page 5-18 Section 5.2.3.2 Alternative 3- Compliance with ARARs and TBCs

The text states that this alternative would be capable of complying with relevant and appropriate standards for protection of surface water. It does not refer to a specific law or regulation. If this reference is to the Remediation Standard Regulations, it should be noted that the surface water protection criteria are a portion of those regulations. As such, the Surface Water Protection Criteria would be Applicable, rather than Relevant and Appropriate.

16. Page 5-18 Section 5.2.3.2 Alternative 3-Long Term Effectiveness and Permanence

Only Aroclor-1260, Aroclor-1254 and cadmium are listed as contaminants which would be addressed by this alternative, although numerous other pollutants are defined in Section 2 as Contaminants of Concern. The text should discuss how these other contaminants, notably lead, would be addressed under this Alternative.

17. Page 5-19 Section 5.2.3.2 Alternative 3- Short Term Effectiveness

This alternative would involve discharge of treated water from the excavation to the Groton POTW. The Navy should be aware that the proposed discharge might be eligible for inclusion under the General Permit for Excavation Dewatering Wastewater. Under this option the Navy would be required to register the discharge with the Department, and to comply with effluent limitations and treatment standards. However, an individual discharge permit or substantive requirements document would not be required.

If you have any questions regarding this letter, please contact me at (860) 424-3768.

Sincerely,



Mark R. Lewis
Senior Environmental Analyst
Federal Remediation Program
Permitting, Enforcement & Remediation Division
Bureau of Water Management

Attachment

cc: Ms. Kimberlee Keckler, US EPA New England, Federal Facilities Section
Mr. Andy Stackpole, NSBNL Environmental Department
Mr. Steve Ruffing, P.E., Brown & Root Environmental

**Naval Submarine Base New London Federal Superfund Site
 Defense Reutilization and Marketing Office Site
 List of State of Connecticut Applicable or Relevant and Appropriate Requirements
 May 28, 1997**

Action-Specific ARARs				
Requirement	Citation	Status, Relevant Alternatives	Synopsis of Requirement	Action to be Taken to Attain ARAR
Hazardous Waste Management: Generator & Handler Requirements- General Standards, Listing & Identification	RCSA §§22a-449(c)100-101	Applicable 3, 4	These regulations establish standards for listing and identification of hazardous waste. The standards of 40 CFR §§260-261 are incorporated by reference. Chromium is not exempted from listing as a hazardous waste.	Hazardous waste determinations will be performed for any excavated wastes and the wastes will be managed in accordance with requirements of these regulations, if necessary.
Hazardous Waste Management: Generator Standards	RCSA §22a-449(c)102	Applicable 3, 4	This regulation establishes standards for various classes of generators. The standards of 40 CFR §262 are incorporated by reference. Storage requirements given at 40 CFR §265.15 are also included.	Any hazardous waste generated through excavation or other activities will be managed in accordance with the substantive requirements of these regulations.
Hazardous Waste Management: TSDF Standards	RCSA §22a-449(c)104	Applicable 4	This regulation establishes standards for treatment, storage, and disposal of hazardous waste, and establishes standards for closure, post closure, and ground water monitoring. The standards of 40 CFR §264 are incorporated by reference. Underground injection of hazardous wastes, and placement of free liquids in landfills are prohibited.	The proposed remedial action does not include any onsite treatment, storage or disposal of hazardous waste. The proposed remedy will comply with the closure requirements of this regulation. Ground water monitoring will be included as part of this remedial action.
Hazardous Waste Management: Interim Status Facilities and Ground water Monitoring Requirements, Closure and Post Closure Requirements	RCSA §22a-449(c)105	Applicable 4	This regulation establishes interim status standards for treatment, storage, and disposal of hazardous waste, and establishes standards for closure, post closure, and ground water monitoring. The standards of 40 CFR §265 are incorporated by reference. The Commissioner may require ground water monitoring based on site specific considerations.	The proposed remedial action does not include any onsite treatment, storage or disposal of hazardous waste. The proposed remedy will comply with the closure requirements of this regulation. Ground water monitoring will be included as part of this remedial action.

**Naval Submarine Base New London Federal Superfund Site
 Defense Reutilization and Marketing Office Site
 List of State of Connecticut Applicable or Relevant and Appropriate Requirements
 May 28, 1997**

Action-Specific ARARs				
Requirement	Citation	Status, Relevant Alternatives	Synopsis of Requirement	Action to be Taken to Attain ARAR
Hazardous Waste Management: Land Disposal Restrictions	RCSA §22a-449(c)108	Applicable 4	This regulation incorporates by reference the Federal Land Disposal Restrictions given at 40 CFR §268.	The requirements of the Land Disposal Restriction will be complied with if any hazardous waste is disposed of on this site as part of the remedy.
Hazardous Waste Management: Permit Requirements	RCSA §22a-449(c)110	Applicable 4	This regulation incorporates by reference the Federal hazardous waste permitting requirements given at 40 CFR §§270 & 124.	If activities which constitute treatment, storage or disposal of hazardous waste onsite are undertaken as part of the remedy, the substantive requirements of these regulations will be met.
Solid Waste Management Regulations	RCSA §§22a-209-1 to 15	Applicable 3,4	These regulations establish operating and closure standards for solid waste disposal areas including closure, post-closure, and groundwater monitoring requirements. Note that the definition of Solid Waste is given in CGS §22a-207.	Those portions of the regulations that are more stringent than Federal RCRA Subtitle D regulations will be complied with.
Solid Waste Management Statutes-Prohibition of littering or dumping	CGS 22a-250	Applicable 3,4	This statute prohibits littering and dumping.	All wastes generated during the Remedial Action will be disposed of in accordance with applicable laws and regulations.
Disposition of PCBs	CGS §22a-467	Applicable 3,4	This statute requires that PCBs be disposed under a permit issued by the Commissioner. PCBs may also be disposed of under a written approval of the Commissioner in a manner which results in the destruction of the PCB or in a manner not inconsistent with the Requirements of the Toxic Substances Control Act (TSCA), listed at 40CFR §761.	All PCB-contaminated materials will be handled in accordance with the substantive requirements of this statute.

**Naval Submarine Base New London Federal Superfund Site
 Defense Reutilization and Marketing Office Site
 List of State of Connecticut Applicable or Relevant and Appropriate Requirements
 May 28, 1997**

Action-Specific ARARs				
Requirement	Citation	Status, Relevant Alternatives	Synopsis of Requirement	Action to be Taken to Attain ARAR
Control of Noise Regulations	RCSA §§22a-69-1 to 69-7.4	Applicable 4	These regulations establish allowable noise levels. Noise levels from construction activities are exempt from these requirements.	No ongoing remedial measures which would generate noise at unacceptable levels are planned after completion of construction.
Water Pollution Control	RCSA §§22a-430-1 to 8	Applicable 3, 4	These rules establish permitting requirements and criteria for water discharge to surface water, ground water and POTWs.	Any discharges from dewatering or other sources will meet the substantive requirements of these regulations including treatment if necessary.
Water Pollution Control	CGS §22a-430b	Applicable 3, 4	This statute allows the department to adopt general permits for many categories of discharges including storm water and dewatering wastewaters from construction activities.	Dewatering may be conducted under the General Permit for Construction Dewatering Wastewaters, if applicable. Any discharges from dewatering or other sources will meet the substantive requirements of the general permit, including treatment if necessary.
Water Pollution Control	CGS §22a-430	Applicable 3, 4	This statute prohibits discharge to the waters of the State without a permit.	Any discharges will meet the substantive requirements of this statute, including treatment if necessary.
Water Quality Standards	Adopted pursuant to CGS § 22a-426	Applicable 1, 2, 3, 4	Connecticut's Water Quality Standards were adopted under this statute. They establish specific numeric criteria, designated uses, and anti degradation policies for groundwater and surface water.	Remedial activities will be undertaken in a manner which is consistent with the antidegradation policy in the Water Quality Standards.

**Naval Submarine Base New London Federal Superfund Site
 Defense Reutilization and Marketing Office Site
 List of State of Connecticut Applicable or Relevant and Appropriate Requirements
 May 28, 1997**

Action-Specific ARARs				
Requirement	Citation	Status, Relevant Alternatives	Synopsis of Requirement	Action to be Taken to Attain ARAR
Remediation Standard Regulations	RCSA §22a-133k-1 to k-3 (Established pursuant to CGS §22a-133k)	Applicable 1, 2, 3, 4	These regulations were adopted on January 30, 1996, under the statutory authority provided by CGS §22a-133k. They provide specific numeric cleanup criteria for a wide variety of contaminants in soil, ground water, and soil vapor. The regulations include a procedure for establishing criteria where none exist for a particular pollutant, and for establishing alternative criteria where those specified in the regulations are not appropriate.	This remedial action will be conducted in accordance with the substantive requirements of these regulations. Compliance with the Direct Exposure and Pollutant Mobility criteria will not be required provided that use of an engineered control is approved by the Commissioner.
Connecticut Water Diversion Policy Act	CGS §§22a-365 to 378	Applicable 3,4	These rules regulate many diversions of the waters of the State. Several broad categories are exempt, including any diversion of less than 50,000 gallons per day and any discharge permitted under CGS §22a-430.	Any non-exempt diversion for dewatering or other purposes will be carried out in accordance with the substantive requirements of these statutes.
Air Pollution Control-Stationary Sources	RCSA §22a-174-3	Applicable 3,4	This regulation requires permits to construct and operate stationary sources of emissions, and requires emissions from those sources to meet specified standards. Pollution abatement controls may be required. Specific standards are listed for many pollutants. Any landfill with potential emissions of any particular air pollutant including methane exceeding 5 tons per year requires a permit under subsection 3(a)1(K). Active gas collection systems with emissions controls may be required at landfills.	Air discharges may result from soil treatment or treatment of dewatering wastewaters. Any treatment system component which produces an air discharge required as part of the remedial action will be designed to meet the substantive requirements of the regulations.

**Naval Submarine Base New London Federal Superfund Site
 Defense Reutilization and Marketing Office Site
 List of State of Connecticut Applicable or Relevant and Appropriate Requirements
 May 28, 1997**

Action-Specific ARARs				
Requirement	Citation	Status, Relevant Alternatives	Synopsis of Requirement	Action to be Taken to Attain ARAR
Air Pollution Control- Control of Particulate Emissions	RCSA §22a- 174-18	Applicable 3,4	This subsection sets specific standards for particulate emissions. Specific standards include Fugitive Dust (18b), and Incineration (18c). Gas flares are regulated as incinerators.	Any excavation, landfill gas flaring or other activities with potential to produce particulate emissions will be designed to meet the substantive requirements of these regulations so that the numeric criteria are not exceeded.
Air Pollution Control- Sulfur Compound Emissions	RCSA §22a- 174-19	Applicable 3,4	This regulation regulates emission of sulfur compounds including sulfur dioxide and hydrogen sulfide. Subsection 19(a)(8) contains specific standards for sulfur compound emissions by gas flares.	Any treatment system component which produces an air discharge will be designed to comply with the substantive requirements of this regulation.
Air Pollution Control- Control of Organic Compound Emissions	RCSA §22a- 174-20	Applicable 3, 4	Subsection (f) of this regulation sets standards for emission of organic compounds. Incineration of organic halocarbons is prohibited under subsection (f)(6)(A).	The treatment system will be designed to comply with the substantive requirements of this regulation.
Air Pollution Control- Control of Odors	RCSA §22a- 174-23	Applicable 3, 4	This regulation prohibits emission of any substance that constitutes a nuisance because of objectionable odor.	Site remediation activities will be planned to control the release of objectionable odors from the site so that the activities comply with the substantive requirements of the regulation.
Air Pollution Control- Control of Hazardous Air Pollutants	RCSA §22a- 174-29	Applicable 3, 4	This regulation establishes testing requirements and allowable stack concentrations for many specific substances.	Direct discharges to the air from the treatment system will be designed to meet the substantive requirements of these regulations so that the numeric criteria are not exceeded.
Regulations for the Well Drilling Industry	RCSA §25- 128-33 to 64	Applicable 3, 4	These regulations apply to any new water supply or withdrawal wells. Non- water supply wells must be constructed so they are not a source or cause of ground water contamination. Procedures for abandonment of wells apply to both water supply and non- water supply wells.	Any recovery, dewatering or water supply wells will be installed in accordance with the substantive requirements of this regulation. Any well abandonments will be conducted in accordance with the substantive requirements of this regulation.

**Naval Submarine Base New London Federal Superfund Site
 Defense Reutilization and Marketing Office Site
 List of State of Connecticut Applicable or Relevant and Appropriate Requirements
 May 28, 1997**

Action-Specific ARARs				
Requirement	Citation	Status, Relevant Alternatives	Synopsis of Requirement	Action to be Taken to Attain ARAR
Registration and Permitting of Wells and Well Drillers	CGS §25-126 thru 131	Applicable 3, 4	These regulations require well drillers to be registered and requires permits and fees for each water supply well drilled. Separate registrations apply to water supply and non- water supply wells. Permits are not required for non water supply wells. However, the driller must file a completion report for both water supply and non- water supply wells.	All wells will be installed by registered drillers and all substantive requirements of this regulation will be met.
CT Guidelines for Soil Erosion and Sediment Control	CT Council on Soil and Water Conservation	To Be Considered 3, 4	The guidelines provide technical and administrative guidance for the development, adoption and implementation of erosion and sediment control program.	These guidelines will be incorporated into any remedial designs for this site.

**Naval Submarine Base New London Federal Superfund Site
 Defense Reutilization and Marketing Office Site
 List of State of Connecticut Applicable or Relevant and Appropriate Requirements
 May 28, 1997**

Location-specific ARARs				
Requirement	Citation	Status, Relevant Alternatives	Synopsis of Requirement	Action to be Taken to Attain ARAR
Regulation of Dredging and Erection of Structures and Placement of Fill in Tidal, Coastal, or Navigable Waters	CGS § 22a-359 through 363	Applicable 3, 4	These statutes control activities in navigable waters of the state waterward of the high tide line.	There are no proposed remedial activities in any areas waterward of the high tide line at this site; however, if such activities take place, these standards are Applicable.
Coastal Management Act	CGS § 22a-90 to 112	Relevant and Appropriate 3, 4	This statute requires persons conducting activities within the coastal zone to submit a coastal site plan to the municipality. The municipality uses the coastal site plan to determine whether the proposed activity poses unacceptable impact on coastal resources and future water dependant activities. The municipality may require the applicant to take all reasonable measures to mitigate such adverse impacts.	A coastal site plan will be submitted for review and the remedy will comply with any substantive requirements.
Federal Coastal Zone Management Act	16 USC part 1451 <i>et seq.</i>	To Be Considered (Federally Applicable)	This Federal Statute is a Federal Location Specific ARAR. The National Oceanic and Atmospheric Administration is responsible for determining whether a proposed action is consistent with the Act. The State's Coastal Management Program is an approved program under the Act. Federal determinations are subject to State review under the Act. The State's review focuses on whether the proposed action is consistent with the State's approved program.	The site is located in the Federal Coastal Management Zone. The remediation will be conducted in accordance with the substantive requirements of the Act.

**Naval Submarine Base New London Federal Superfund Site
 Defense Reutilization and Marketing Office Site
 List of State of Connecticut Applicable or Relevant and Appropriate Requirements
 May 28, 1997**

Chemical-specific ARARs				
Requirement	Citation	Status, Relevant Alternatives	Synopsis of Requirement	Action to be Taken to Attain ARAR
Remediation Standard Regulations	RCSA §22a-133k-1 to k-3 (Established pursuant to CGS §22a-133k)	Applicable 1, 2, 3, 4	These regulations were adopted on January 30, 1996, under the statutory authority provided by CGS §22a-133k. They provide specific numeric cleanup criteria for a wide variety of contaminants in soil, ground water, and soil vapor. The regulations include a procedure for establishing criteria where none exist for a particular pollutant, and for establishing alternative criteria where those specified in the regulations are not appropriate.	This remedial action will be conducted in accordance with the substantive requirements of these regulations. Compliance with the Direct Exposure and Pollutant Mobility criteria will not be required provided that use of an engineered control is approved by the Commissioner.