



DEPARTMENT OF THE NAVY

NORTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

10 INDUSTRIAL HIGHWAY

MAIL STOP, #82

LESTER, PA 19113-2090

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NSB NEW LONDON
5090.3a

IN REPLY REFER TO

5090
Code 1823\ME

30 DEC 1997

Ms. Kymberlee Keckler
Remedial Project Manager
U.S. Environmental Protection Agency
J.F.K. Federal Building (HBT)
Boston, MA 02203-2211

SUBJ: RESPONSES TO EPA COMMENTS ON THE DRAFT RECORD OF DECISION
FOR THE DEFENSE REUTILIZATION AND MARKETING OFFICE (DRMO)
SITE AT THE NAVAL SUBMARINE BASE NEW LONDON, GROTON, CT

Dear Ms. Keckler:

Please find enclosed the Navy's responses to your comments of
December 2, 1997 regarding the Draft Record of Decision for the
DRMO site at the Naval Submarine Base New London.

If you have any other questions or comments please do not
hesitate to contact me at (610) 595-0567 ext. 162.

Sincerely,

Mark Evans
Remedial Project Manager
By direction of the
Commanding Officer

Copy to:
Mr. Mark Lewis, CTDEP
Mr. Dick Conant, NSB-NLON
Mr. Jean-Luc Glorieux, B&R - Pittsburgh

**RESPONSES TO
U.S. EPA's DECEMBER 2, 1997 LETTER OF COMMENTS
REGARDING THE
NOVEMBER 1997 DRAFT RECORD OF DECISION
FOR THE DEFENSE REUTILIZATION AND MARKETING OFFICE
NAVAL SUBMARINE BASE NEW LONDON
GROTON, CONNECTICUT**

December 29, 1997

GENERAL COMMENTS

1. Cover Letter, page 1, paragraph 1

Comment: Overall, EPA is mostly concerned with Section 10 of the IROD. It is also unclear why the ARARs tables have changed from the ARARs tables that EPA provided to you on May 15, 1997 as part of the FS. EPA's and the CTDEP's comments on Section 10 of the ROD were transmitted to you electronically on November 24, 1997.

Response: Section 10 of the IROD ^{which are} as transmitted electronically by U.S. EPA to the Navy will be substituted to that used in the draft ROD with one revision. The following sentence in Section 10.1.3 Land Use Restrictions, **"A notification describing the LURs contained herein is to be filed within all applicable land records located on ~~and off~~ the Installation in order to provide notice of the restrictions to all present and future parties using, occupying, and/or conducting activities within the Subject Area until the final remedy is selected"**, will be deleted.

The reason why the ARARs tables (Tables 11-1 to 11-3) provided in the IROD are slightly different from those provided by U.S. EPA to the Navy on May 15, 1997 is that it was necessary to modify U.S. EPA's tables to include the input provided by CTDEP with the ARARs tables appended to their May 28, 1997 letter of comments on the draft FS Report. Tables 11-1 to 11-3 are in fact identical to the ARARs tables provided for the detailed evaluation of Alternative 2 in the September 1997 draft final and November 1997 final FS Reports (Tables 5-3 to 5-5) and upon which U.S. EPA did not comment.

SPECIFIC COMMENTS (ATTACHMENT A)

2. Page 1, Assessment of the DRMO

Comment: In the first sentence, change "contaminants" to "hazardous substances" and replace "an imminent and substantial endangerment" with "a current or potential threat". This is required language for all RODs.

Response: The requested change and replacement will be made.

3. Page 2, paragraph 1

Comment: In the second sentence, add ", although there is potential for migration of contaminants through the groundwater and into the Thames River" at the end after "health risk".

Response: The requested language will be added.

4. Page 2, paragraph 2

Comment: After "soils were excavated" in the third sentence, insert ":down to the watertable."

Response: The requested insertion will be made.

5. Page 2, paragraph 2

Comment: Insert a new fourth sentence: "Contaminated soil remains in place below the watertable."

Response: The requested fourth sentence will be inserted.

6. Page 2, paragraph 3

Comment: In the second sentence, replace "soil is" with "soil and potential migration of contaminants into the groundwater are" and change "threat" to "threats."

Response: The requested replacement and change will be made.

7. Page 2, paragraph 3

Comment: After "Base Master Plan" in the third sentence, add "in the event that the Navy transfers title to the property."

Response: The proposed addition makes the third sentence very awkward to read. Also, the proposed addition seems to be misleading since records of site contamination will be kept in the Base Master Plan whether or not the Navy transfers title to the property. Possibly a new sentence should be added. Please clarify this comment.

8. Page 2, paragraph 4

Comment: Change the second sentence to: "However, because this remedy will result in hazardous substances remaining in the soils above health-based levels, groundwater monitoring will be implemented to assess whether the remedy is achieving long-term remedial requirements. A review of the data and site conditions will be conducted within five years after commencement of remedial action to insure that the remedy continues to provide adequate protection of human health and the environment."

Response: The second sentence will be changed as requested.

9. Page 2, paragraph 4

Comment: Add a new last sentence that states: "Protection of the environment will be assessed through groundwater monitoring to evaluate contaminant migration risks."

Response: The requested new last sentence will be added.

10. Page 2-2, paragraph 3

Comment: In the second sentence, after "were excavated from the site" insert "down to the groundwater level." At the end of the second sentence add another sentence that states: "Contaminated soil below the groundwater level was left in place."

Response: The requested insertion will be made and the requested sentence will be added.

11. Page 3-3, paragraph 1

Comment: In the last sentence, after "Ledyard, Connecticut" add "and at the Base Library."

Response: As agreed upon during a phone conversation on December 30, 1997 between K. Keckler and M. Evans the requested addition will not be made.

12. Page 4-1, paragraph 3

Comment: In the fourth sentence, insert "background levels" after "shown to exceed site-specific."

Response: The fourth sentence discusses contingency planning in case primary groundwater monitoring criteria are exceeded and the "site-specific" in that sentence refers to site-specific SWPCs as developed in Section 2.1.4.1 (page 2-12, paragraph 2) of the FS Report (B&R Environmental, November 1997) and as discussed in Section 5: Monitoring Criteria and Data Evaluation of the Groundwater Monitoring Plan (B&R Environmental, October 1997). Therefore, the requested insertion of "background levels" after "shown to exceed site-specific" would be inappropriate.

To clarify this, the fourth sentence will be re-written to read: "If the concentrations are shown to exceed site-specific *Surface Water Protection Criteria (SWPC)* and State of Connecticut SWPC.."

13. Page 5-9, Section 5.5

Comment: Add two new last sentences. "However, the site lies within the floodplain of the Thames River, which flows past the site. Potential ecological receptors occur within the river system."

Response: The requested two new last sentences will be added.

14. Page 6-16, Section 6.4.5

Comment: Please add a discussion regarding tidal flow of groundwater into and out of the site and migration during flood events when the entire site may be inundated. These uncertainties should be acknowledged.

Response: Section 6.4.5 will be modified to acknowledge the uncertainties regarding the impact of tidal groundwater flow and periodic site flooding upon contaminant migration.

15. Page 8-2, Section 8.2

Comment: *Operating and Maintenance Cost:* Do these estimates include costs for both monitoring and cap maintenance?

Response: The total \$618,000 30-year O&M cost shown for Alternative 2 includes the cost of maintaining the existing asphalt/GCL cap and of 3 years of groundwater monitoring plus the cost of the 5-year reviews. However, this O&M cost does not include either the cost of possible groundwater monitoring beyond 3 years or the cost of possible surface water or sediment monitoring.

16. Page 8-3, 6th bullet

Comment: Delete the reference to Land Disposal Restrictions (see *also* page 8-5, 6th bullet).

Response: See response to Comment No. 1. Land Disposal Restrictions was one of the action-specific ARARs requested by CTDEP in their May 28, 1997 letter of comment on the draft FS Report.

17. Pages 10-1 to 10-7

Comment: Replace this entire section with the revised section provided to you electronically on November 24, 1997.

Response: This will be done.

18. Page 11-3, Table 11-2

Comment: Under Federal Location-Specific ARARs add (column text separated by a "-"):

Fish and Wildlife Coordination Act - 16 U.S.C. 661 *et seq.*; 40 C.F.R., Section 6.302 - Applicable - Requires action to be taken to protect fish and wildlife from projects affecting streams or rivers. Consultation with the U.S. Fish and Wildlife Service to develop measures to prevent and mitigate loss - If monitoring is to be conducted in the river or its tidal zone, the U.S. Fish & Wildlife Service will be consulted as to measures required to protect fish and wildlife resources,

Response: This ARAR will be added to Table 11-2 with the following proposed changes:

The status of this ARAR will be indicated as "Potentially Applicable" rather than "Applicable" since action will only be taken to satisfy this ARAR if contaminants are determined to migrate to the Thames River.

In the "Synopsis" column, the second sentence will be amended to read: "Consultation with the U.S. Fish and Wildlife Service *is required* to develop measures to prevent and mitigate loss."

19. Page 11-3, Table 11-2

Comment: The State of Connecticut Coastal Management Act is "Applicable"

Response: The status of the State of Connecticut Coastal Management Act will be changed from "Relevant and Appropriate" to "Applicable".

20. Page 11-4, Table 11-3

Comment: Please use the Action-Specific ARARs table provided to you in my letter dated May 15, 1997. The State of Connecticut Hazardous Waste Management Generator Standards are "Applicable"

Response: See response to Comment No. 1. The ARARs tables provided in U.S. EPA's May 15, 1997 letter had to be modified to include the input provided by CTDEP with the ARARs tables appended to their May 28, 1997 letter of comments on the draft FS Report. The status of the State of Connecticut Waste Management Generator Standards should remain "Potentially Applicable" since these standards would only become "Applicable" in case installation of monitoring wells results in the excavation of hazardous waste, which is far from certain.

21. Page 11-4 to 11-5, Table 11-3

Comment: Delete Land Disposal Restrictions, both Solid Waste references, and the two well drilling references. Add citations under State of Connecticut for (column text separated by a "-"):

Control of Noise Regulations - RCSA Section 22a-69-1 through 7.4 - Applicable - These regulations establish allowable noise levels. Noise levels from construction activities are exempt from these requirements. - Noise generated by installation of monitoring wells will meet these regulations. This alternative involves drilling and monitoring activities that are not anticipated to generate excessive noise,

Water Quality Standards - CGS 22a-426 - Relevant and Appropriate - Connecticut's Water Quality

Standards establish specific numeric criteria, designated uses, and anti-degradation policies for groundwater - Standards will be used to evaluate monitoring results to determine if further remedial action is required to protect resources,

Response: See responses to Comments Nos. 1 and 16. Land Disposal Restrictions, Solid Waste Management Regulations, Regulations for the Well Drilling Industry, and Registration and Permitting of Wells and Well Drillers are all action-specific ARARs which were requested by CTDEP in their May 28, 1997 letter of comments on the draft FS Report. The well installation ARARs seem particularly applicable since this is an important component of the proposed remedy.

The Control of Noise Regulation ARAR will be added to Table 11-3. However, under "Evaluation/Action to be Taken", the first sentence should be eliminated and the second sentence modified to read: "This alternative *only* involves drilling and monitoring activities. ***Drilling, as a construction activity, is exempt from these requirements, although this activity is not anticipated to generate excessive noise. Monitoring activities are not anticipated to generate any significant noise.***

The Water Quality Standards ARAR will be added as proposed to Table 11-3.

22. Page 11-6, paragraph 1

Comment: After "Master Plan", in the second sentence, add "~~at the site~~, and through ^(an) other applicable means."

Response: The requested addition implies that a copy of the Base Master Plan must be kept at the site. Section 10.1.3.1 (page 10-2, paragraph 3, second sentence) of the revised Section 10 provided by U.S. EPA only requires that copy of the Land Use Restrictions (LURs) "be maintained and available at the Subject Area.". Also, what is meant by "through an other applicable means."? Please clarify this comment.

23. Page 11-6, paragraph 1

Comment: After "Master Plan", in the third sentence, add "at the site , ^{OK} ~~and~~ through ^(an) other applicable means."

Response: See response to Comment No. 22. The requested addition implies that a copy of the Base Master Plan must be kept at the site. Section 10.1.3.1 (page 10-2, paragraph 3, second sentence) of the revised Section 10 provided by U.S. EPA only requires that copy of the Land Use Restrictions (LURs) "be maintained and available at the Subject Area.". Also, what is meant by "through an other applicable means."? Please clarify this comment.

24. Page G-2, Definitions

Comment: Please add a definition of "Vadose"

Response: A definition of "Vadose" will be added to the glossary.