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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

June 4, 2004

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

Re: Draft Record of Decision for the Torpedo Shop Soils (OU8)

Dear Mr. Evans:

Thank you for the opportunity to review the Draft Record of Decision for the Torpedo Shop Soils (OU8). Detailed comments are provided in Attachment A.

In order to complete the CERCLA actions at OU8, EPA recommends that the ROD explain the removal action at the Over Bank Disposal Area Northeast (OBDANE) that began in 1999. This will better enable us to more efficiently close out the site administratively because a separate ROD will not be required for OBDANE. The OU8 ROD should explain that the removal action addressed all site risks (and that remedial action goals established for the adjacent Area A Downstream were met) identified in the Phase II RI for the OBDANE site and that further CERCLA action is not necessary. Sections 1.4 and 2.12 will therefore need to be modified accordingly. The titles and description of OU8 should be changed to explain that it includes Site 14 soils.

I look forward to working with you and the Connecticut Department of Environmental Protection to protect the environs of the Naval Submarine Base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT
Melissa Griffin, NSBNL, Groton, CT
David Peterson, USEPA, Boston, MA

ATTACHMENT A

Page	Comment
p. 1-1, §1.4	Please explain what decision documents will address the groundwater in OU9 that has not been finalized yet. Possible options include splitting the groundwater OU and using an interim ROD for the northern half of the OU (*see* third to fifth sentences)?
p. 1-3, ¶1	In the last sentence after "clean closure" add "to residential reuse standards."
p. 2-6	Twelve OUs have been identified at the NSBNL. OU12 is the Area A Wetland.
p. 2-11, §2.7	The risk discussion must be consistent with other documents. This section does not identify any specific federal risks at the site.
p. 2-19, §2.10.1	Modify the first sentence to read "Alternatives S2 and S3 are expected to be protective to human health and the environment."
p. 2-23, ¶2	Strike "brief" from the last sentence.
p. 2-23, ¶3	In the excavation section there is no discussion of potential groundwater seepage or management. It is mentioned on page 2-24 in Section 2.13.2.
p. 2-25, bullet 1	Page 2-12 discusses how RfDs were used in developing the risk assessment. They therefore should be cited as TBCs in this section.
p. 2-23	Remove the third bullet, since LDR is relevant to the proposed remedy.
Tables 2-10 to 2-12	Page 2-12 discusses how RfDs were used in developing the risk assessment. They therefore should be cited as TBCs in the Chemical-specific Tables.
Table 2-13	RCRA is "Relevant and Appropriate" not "Potentially applicable."
	Remove the LDR line since it is not applicable to this remedy.
	The State Hazardous Waste Management standards are "Applicable" since the Navy must test the waste before disposal.