



DEPARTMENT OF THE NAVY

NORTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

10 INDUSTRIAL HIGHWAY

MAIL STOP, #82

LESTER, PA 19113-2090

N00129.AR.000720
NSB NEW LONDON
5090.3a

5090
Code 1823\ME

21 MAY 1999

Ms. Kymberlee Keckler
Remedial Project Manager
U.S. Environmental Protection Agency
1 Congress Street
Suite 1100 (HBT)
Boston, MA 02114-2023

Dear Ms. Keckler:

SUBJ: RESPONSES TO USEPA LETTER OF APRIL 6, 1999 ON THE DRAFT
PROPOSED PLAN FOR THE GOSS COVE LANDFILL - SITE 8, NAVAL
SUBMARINE BASE NEW LONDON, GROTON, CT

Thank you for reviewing the Draft Proposed Plan for the Goss Cove Landfill site at the Naval Submarine Base New London. Please find attached the Navy's responses to the comments in your April 6, 1999 letter.

The Navy looks forward to finalizing this document and working with you to develop the Record of Decision for this site. 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. Matt Bartman, Tetra Tech NUS - Pittsburgh

RESPONSES TO
USEPA's APRIL 6, 1999 LETTER OF COMMENTS
REGARDING THE MARCH, 1999
DRAFT PROPOSED PLAN
FOR THE GOSS COVE LANDFILL (Site 8)
NAVAL SUBMARINE BASE - NEW LONDON
GROTON, CONNECTICUT

May 21, 1999

GENERAL COMMENTS (COVER LETTER)

1. Comment: Please be advised that you are required to comply with the remedy selection and public participation requirements established at 40 C.F.R. § 300.430(f). EPA further recommends that you provide copies of the final Proposed Plan to property abutters, local officials, environmental groups, local media, and other interested stakeholders.

Response: The Navy is aware of this requirement and will comply with the public participation requirements established in 40 C.F.R.

SPECIFIC COMMENTS (ATTACHMENT A)

1. p. 1, 1st column

Comment: The description of the proposed remedy should include No Further Action for Goss Cove. The description of the proposed engineered cap remedy should clarify that it is for the landfill.

Response: The text will be revised to include the No Further Action for the cove.

2. p. 2, Summary of Alternatives Table

Comment: Cost estimates - including that for the No Action alternative – should include the cost of 5-year reviews.

Alternative 2A and 2B should be split and each evaluated separately. In the Components section, add a new second bullet: "Test excavated soil for hazardous characteristics." In the third bullet change "0layered cap" to "layered cap." In the fifth bullet change "Review" to "reviews."

For the 2A Comment change the first bullet to: "Partially protective of human health and the environment." Change the second bullet to: "Not Compliant will all State and Federal statutes

and regulatory requirements.” Change the third bullet to: “Limited reduction of potential contaminant migration.

For the 2B Comment change the first bullet to: “Protective of human health and the environment.” Change the second bullet to: “Compliant with State and Federal statutes and regulatory requirements.”

Response: These costs as presented in the feasibility study will be provided.

If possible the text will be reformatted to provide Alternative 2A and 2B separately. Presentation of this information may require the text of the Proposed Plan to be reformatted. Readability of the text will be maintained. Hazardous characteristic testing will only be performed on the excavated soil that cannot be compacted in the existing paved area or if visual or instrument readings during excavation indicate potential hazardous waste. The Proposed Plan text will not be revised to indicate the need for testing. The typo “0layered” will be corrected. The word “Review” will be modified to “Reviews”.

The text presented in the Feasibility Study does not indicate that Alternative 2A is “Partially protective of human health and the environment”. In order to maintain consistency between the documents the text presented in the Proposed Plan will not be revised. The text in the second bullet will be modified per the comment. A determination how effective the cap construction will be on reducing contaminant migration cannot be made. It is assumed that cap construction will reduce contaminant migration by reducing infiltration; however, it can not be determined the impact the cap will have on migration.

3. p. 3, 1st column

Comment: In #2 insert “and facility siting” after “state environmental.”

Response: These changes will be made to #2.

4. p. 3, 2nd column, ¶3

Comment: In the third sentence, change “for 30 years to” to “until no further risk to human health or the environment exists. The reviews will.”

Response: This modification will be incorporated into the text.

5. p. 4, 1st column

Comment: In the definition of “ARARs” insert “and facility siting” after “state environmental.”

Response: This modification will be incorporated into the text.