



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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December 21, 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: 2003 Annual Landfill Inspection Report for the Goss Cove Landfill

Dear Mr. Evans:

EPA reviewed the *2003 Annual Landfill Inspection Report for Goss Cove Landfill*, Naval Submarine Base - New London, Groton, Connecticut, dated November 2004. This document presents a revised report for the annual landfill inspection at the Goss Cove Landfill conducted on June 4, 2003 with a supplemental inspection of deficiencies conducted November 4, 2003. EPA focused its review on the consistency of the inspection with the O&M manual requirements, the completeness and technical accuracy of the information presented, and conformance with EPA comments on earlier versions of this document.

It appears there is a mistake in the original Inspection Checklist in the O&M Manual that was not previously detected or corrected. It is noted that Items #36 a and b in the Inspection Checklist refer to the Upper Junction box, which is across Shark Boulevard and off the site, whereas they should apparently refer to the Lower Junction Box which is on the Museum property at the upstream end of the box culvert. The Inspection Checklist should be corrected unless Navy believes the reference to the Upper Junction Box is correct. If it is, please confirm that the Upper Junction Box was in fact inspected.

Page 11 of the two inspection checklists has not been completed properly: the inspector did not date his signature and no signatures have been provided for the O&M Engineer and the IRP Manager certifying the inspection. Please provide certified copies of the two inspection checklists for 2003 and ensure that future submittals contain certified inspection checklists.

It is noted that inspection of the box culvert did not occur in 2003; however Navy has agreed to conduct a video inspection of the box culvert in 2004. This inspection should include inspection of the box culvert joints, the piping connections to the box culvert from the catch basins, and inspection of the lower junction box interior to verify the integrity of the connection of the junction box with the box culvert.

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

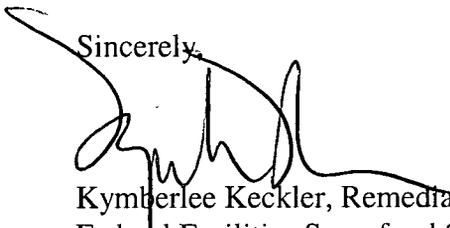
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The O&M Manual requires that final versions of the "completed Site Inspection Checklists, Records of Review, Plans of Action, and Completion Reports and any other documentation and correspondence related to the maintenance and repair of the implemented site remedy," together with a detailed Table of Contents, will be incorporated into Appendix E of the O&M Manual for each landfill site. It is not apparent that this has been done. For example, these documents have not been provided for O&M Manual with control number 000005. Please clarify the status of these reports for the Goss Cove Landfill Site.

The last sentence on page 3 suggests that photographs of deficiencies were taken during the June 4, 2003, although the language is ambiguous. However, date stamps on the photographs suggest that they were actually taken on November 4, 2003 during the re-inspection. In the future, please ensure that photographs of deficiencies are taken during every annual and supplemental inspection.

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

cc: Mark Lewis, CTDEP, Hartford, CT
Melissa Cokas, NSBNL, Groton, CT
Jennifer Stump, Gannett Fleming, Harrisburg, PA