

**NAVY RESPONSE TO COMMENTS FROM THE
U.S. ENVIRONMENTAL PROTECTION AGENCY
ON THE DRAFT FEASIBILITY STUDY
FOR SOIL AND GROUND WATER AT THE LOWER SUBBASE
AT THE NAVAL SUBMARINE BASE NEW LONDON
GROTON, CONNECTICUT**

COMMENTOR: Kymberlee Keckler, Remedial Project Manager **DATED:** 26 October 1999
Federal Facilities Superfund Section

The following Navy responses pertain to the U.S. Environmental Protection Agency's (EPA) comments, dated 26 October 1999, on the Navy's draft *Feasibility Study for Soil and Ground Water at the Lower Subbase, Naval Submarine Base, New London, Groton, Connecticut* dated July 1999. It should be of particular note that the responses presented in this document are predominantly generic. The draft Feasibility Study (FS) has undergone considerable change based upon comments received for the July 1999 draft FS, and for comments received for the draft *Feasibility Study for Soil and Sediment at Site 20 – Area A Weapons Center, Naval Submarine Base, New London, Groton, Connecticut*. Based upon these comments, and the considerable changes, it was necessary to generically answer the majority of the comments with the understanding that the revised draft *Feasibility Study for Soil and Ground Water at the Lower Subbase, Naval Submarine Base, New London, Groton, Connecticut* would address these comments completely.

Some of the comments have been answered specifically. Attempts were made to specifically answer comments that referred to sections that would not have undergone elaborate changes.

GENERAL COMMENTS

1. EPA reviewed the document entitled *Feasibility Study for Soil and Ground Water at the Lower Subbase, Naval Submarine Base, New London, Groton, Connecticut*, dated July 1999. The FS summarizes results of past characterization of contamination in each of the seven Zones of the Lower Subbase, as well as human-health and ecological risk assessments. It further identifies and evaluates remedial technologies appropriate to the contaminants present and the site characteristics. EPA reviewed the document for consistency with previous site characterization efforts and the appropriateness of the remedial alternatives considered. Overall, I am disappointed with the FS's failure to evaluate ARAR-compliant alternatives, the lack of attention given to areas with higher contamination, the limited evaluation of treatment technologies, the inconsistencies in the risk analyses, and the unclear descriptions of how the analyses and evaluations were performed. Detailed comments are provided in Attachment A.

Response—Comment noted. Sections of the FS relating to ARAR-compliance, the risk analysis, and the scopes of remedial alternatives have been significantly modified, including the evaluations of potential technologies and process options in Chapter 3 which will be significantly changed to more completely evaluate the potential remedial technologies.

- EPA identified numerous errors in the ARARs tables and is therefore providing revised ARARs tables to replace the tables in the FS (see Attachment B). The ARARs tables and discussion of compliance with ARARs must be consistent throughout the FS.

Response—Comment noted. The ARAR tables supplied by the EPA has been incorporated appropriately.

- The FS appears to propose a hierarchy of remedial approaches, typically of increasingly aggressive scope, and to evaluate them *relative* to each other for each Zone. For this reason, the proposed remedial activities were reviewed for their general appropriateness and efficacy, rather than for details of the proposed remedial designs. For example, issues regarding the quantity or location of monitoring wells can be debated during remedial design. Small changes of this nature are assumed to have insignificant impact on the evaluation of the *relative* merits of various levels of remedial action.

Response—Comment noted. The relative comparative analysis was conducted as part of the detailed analysis of alternatives. The seven zones of the Lower Subbase are considered to be separate areas of investigation for the general evaluation; however, similar alternatives may be combined across zones during the Remedial Design and Remedial Action phases. The Navy agrees that details regarding the specific number or locations of monitoring wells, etc. are more appropriate for the Remedial Design phase. Technical details are provided in the FS as appropriate for the conceptual development of alternatives.

- EPA's primary concern relates to the FS's failure to evaluate ARAR-compliant alternatives. Zones 2, 3, 4, and 7 contain RCRA characteristic wastes. None of the alternatives evaluated in the FS comply with RCRA requirements.

Response—Lead concentration for 10 soil samples exceeded the maximum TCLP criteria (5 mg/L) for RCRA characteristic wastes. These characteristic wastes were generally found in a few localized areas. These locations include:

Zone	Location	Concentration
2	13MW11	8.60 mg/L
3	SB17	5.88 mg/L
4	13MW16	7.40 mg/L
4	13TB3A	109 mg/L
4	13TB3A	150 mg/L
4	13TB3A	21.3 mg/L
4	QW-1	51.9 mg/L
4	WE4A	143 mg/L
7	20MW5	45.9 mg/L
7	20MW6	17.4 mg/L

Note that 3 samples in Zone 4 were collected at the same location. Three of the 4 locations in Zone 4 with RCRA characteristic wastes are in a small area along Albacore Road in the northwest corner of Zone 4. The sample in Zone 3 was collected inside Building 31. The sample in Zone 2 was collected along Albacore Road between Building 31 and Building 20. The 2 samples in Zone 7 are close together along Amberjack Road south of the former

incinerator building. Remedial alternatives for these locations will take into consideration RCRA requirements for control and handling of characteristic hazardous waste.

5. Although the Navy includes a removal component for contaminated soils in the most aggressive alternative evaluated for each Zone where removals are deemed effective, EPA is concerned that the FS does not fully evaluate treatment technologies, including treatment trains that could address multiple contaminants of concern. As a result, the remedies evaluated in the FS do not satisfy the NCP preference for treatment.

Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

6. The balancing of alternatives in the FS appears to place greater emphasis on implementability than on overall protectiveness of human health and the environment and long-term effectiveness and permanence. For example, while EPA recognizes that exploration and remediation of the Lower Subbase will be hampered by extensive cover by buildings and pavement, it is highly inappropriate to eliminate alternatives because they are difficult to implement. EPA also considered the objectivity of the assessments of the criteria noted. In particular, the appropriateness of the *range* of remedial alternatives considered by Navy was evaluated for the particular contaminants identified at the site and for the particular site conditions. Consideration of remedial alternatives that fall short of reasonable objectives for cleanup obviously would not present the full range necessary to select a preferred alternative in light of the NCP criteria.

Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

7. Because of historic use patterns, contamination is ubiquitous and varied in nature, but patchy and often at moderate levels. Extensive building and pavement cover throughout the Lower Subbase will complicate the implementability of any necessary remediation. The argument that extensive infrastructure (buildings, utilities, and pavement) and base activities result in access difficulties that limit remedial alternatives is not persuasive. In fact, you may recall from a few years ago that a local television station had little difficulty entering the lower subbase and filming it for the evening news. While these factors affect cost and implementability, they are not insurmountable engineering challenges.

Response—Although a complicating factor, site access is not the primary impediment to most remediation technologies. The ability to physically gain access to the facility, as demonstrated by the local television crew, is not the basis for determining applicability, or implementability of a technology. Rather, as shown in Appendix A of the FS, the extensive subsurface utility network is present in almost every portion of the Lower Subbase. The presence of this network is the issue at hand.

8. The FS fails to adequately address contaminated soils in deeper strata and the potential risks posed by them. More aggressive removals of contaminated soils must be considered in Zones 1, 4 and 7, in view of the higher human-health and ecological risks calculated for those areas, the elevated TPH and lead values in deeper soils, and the potential for contaminant

migration. Special excavation methods (e.g., sheetpile bulkheads, lowering the water-table by pumping encircling hydraulic-control wells, etc.) may be required to remove soils below the water table because of the shallow water table. Both lead and TPH above industrial/commercial direct exposure criteria and/or pollutant mobility criteria have been identified in deeper soils:

Zone 1 (see Figure 2-1)	Zone 4 (see Figure 2-6)	Zone 7 (see Figure 2-10)
TPH at 14,000 mg/kg (10-14 ft bgs) at 13MW2; TPH at 11,000 mg/kg (12-14 ft bgs) at 13MW3; TPH at 51,600 mg/kg (9-11 ft bgs) at 13MW18; TPH at 7000 mg/kg (10-12 ft bgs) at 13MW5; TPH at 26,800 mg/kg (11-12 ft bgs) at GS-32L; TPH at 14,900 mg/kg (7 ft bgs) at GS-29L; TPH at 6,670 mg/kg (6 ft bgs) at GS-25L	TPH at 11,800 mg/kg (6-8 ft bgs) at 13TB2A; Pb at 2080 mg/kg (4-6 ft bgs) at 13TB2A; TPH at 9360 mg/kg (8 ft bgs) at GS-9L	Pb at 13,300 mg/kg (5-6 ft bgs) at MW5-7RI / TB10-7RI; Pb at 9770 mg/kg (14-16 ft bgs) at 20TB4; Pb at 2580 mg/kg (5-6 ft bgs) at TB9-7RI; benzo(a)pyrene at several locations

The contamination at 5-6 ft bgs in Zone 7 appears to be at or just above the water table (see Figure 10-2 in the RI).

Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

- As human-health risk is the principal driver for soil removals that might be considered, it is useful to summarize, from the tables provided (Tables 1-4 to 1-10), where the major concerns lie. As with most human health risk assessments, the Future Resident scenario clearly carries the highest risks. The Navy maintains, appropriately, that this scenario is extremely conservative, because it is very unlikely that the site will be developed for residential use in the foreseeable future. Nonetheless, the risk assessment concluded that the Future Resident would be exposed to cumulative cancer risk in excess of the CTDEP criterion of 10^{-5} under the reasonable maximum exposure scenario for all seven Zones, and under the Central Tendency Exposure scenario for Zone 1, as well. The Full-Time Employee is exposed to risk in exceedance of the CTDEP criterion for the RME scenario in Zones 1, 4, and 7. The Construction Worker is at risk above the CTDEP criterion for the RME scenario only in Zone 1.

Response—A table has been added that summarizes the unacceptable risks identified in Tables 1-4 through 1-10.

- Given the risks posed by the site residential development/exposure should be avoided. This can be achieved through land-use restrictions. The risk to the Full-Time Employee can be reduced by the hot-spot removals for shallow soils proposed in Navy's most aggressive alternatives, and other alternatives that may be included in subsequent revisions to the FS. Additional removals targeted at contaminants in deep soils would appear to provide little benefit to the Full-Time Employee. However, the FS does not evaluate remedial alternatives for the deep soil to address unacceptable risk in the construction worker scenario.

Response—Comment noted. As noted, the FS did include ELUR to address risks to future residents and selective excavation to address risks to site workers. As agreed for the Site 20 FS, the ELUR will be implemented and selective excavation will address both shallow and deep soil. The following text discussing the ELUR has been added where applicable:

Institutional controls will be implemented to prevent/control future contact with elevated concentrations of COCs in soil and sediment. Under the State Remediation Standards, ELUR cannot be established until a deed is created for the parcel. Since there are no deeds currently for NSB-NLON, the ELUR would instead be recorded on the Base Master Plan. Furthermore, there will be a requirement written into the ELUR and the ROD that if the site is ever sold or leased, upon creation of the deed or lease, the ELUR would be recorded in accordance with applicable federal, state, and local standards. ELUR, recorded in the Base Master Plan and in any future property transfer documents, will be required to: (1) prevent future residential contact with COCs in sediment that exceed risk-based PRGs, (2) prevent future contact with COCs in soil that exceed Direct Exposure Criteria, and (3) prevent removal of asphalt over areas where COCs in soil exceed PMC.

ELUR would also include limitations to construction activities at Lower Subbase to maintain the asphalt integrity and prevent infiltration of precipitation that could result in migration of COCs into ground water. ELUR would be protective of site workers with respect to the identified potential risks associated with direct contact with COCs in sediment by requiring appropriate personal protective equipment for site workers during any maintenance work within the drainage ditches. ELUR would cover the extent of the zone and be maintained for as long as COCs are present above standards. Unless additional remediation is undertaken, this zone could not be redeveloped for residential land use.

11. Generally, only validated data are used to calculate cancer risks and non-cancer hazards. Please indicate what level of quality assurance and quality control were performed in the unvalidated data analyses and/or on the results. Please also justify the use of the unvalidated data and discuss how the exposure points calculated in the Human Health Risk Assessment have been affected.

Response—Risk calculations for Zones 5 and 7 are most influenced by unvalidated data. In Zone 5, unvalidated samples accounted for approximately 50-70 percent of the samples used for risk calculations. In Zone 7, unvalidated samples accounted for approximately 25-40 percent of the samples used for the risk calculations. No unvalidated samples were included in the analyses for Zones 2 and 6. Validated samples accounted for more than 92 percent of samples in Zone 1; only one unvalidated sample was included in the analysis for Zone 1. All samples in Zones 3 and 4 with reported detections of PAH or pesticide COCs were validated. In Zone 3, except for lead, 80 percent of the samples used in the risk calculations were validated (i.e., 8 of 10 samples). In Zone 3, 101 of 120 lead samples were not validated. Many of these samples were collected in conjunction with remedial actions that have occurred relative to Building 31. Approximately 70 percent of the samples in Zone 4 with reported detections of COC metals were validated.

2
The UCLs calculated using only validated data were consistently slightly higher than with the larger database containing both validated and unvalidated data except for Zone 5 where the UCL decreased. Both the cancer and non-cancer risk calculations were unchanged for all COCs in Zone 2, 4, and 6 and decreased in Zone 5 using only validated data. In Zone 3 the calculated risks were unchanged for all COCs except arsenic which increased slightly. The risk calculations for Zones 1 and 7 increase slightly using only validated data, but generally do not affect which COCs contribute to the overall risk summary or which locations exceed PRG. The revised draft FS will use only validated data for risk calculations.

12. Data supporting the risk calculations for the full-time employee appears (re: Appendix B, Table B-3) to include both shallow and deep soil. For the current full-time employee, only exposure to shallow soil seems reasonable. However, if there is construction of other structures on the property, then the future full-time employee may be exposed to the soils at greater depths. Were the 95% UCLs for the current and future (i.e., exposure to shallow soil versus shallow and deep soil) full-time employee compared? If so, was the greater 95% UCL (i.e., benzo(a)pyrene) based on the exposure to the combination of both the shallow and deep soils?

Response—Comment noted. Human health risk-based PRGs have been recalculated accordingly.

13. The human health risk based PRG derivation discussion in the text of the FS does not include derivation of a risk based PRG for lead. The FS should compare the state standard and the site-specific risk-based PRG for lead so that the lower value can be used as the PRG. The derivation of soil lead PRGs is necessary as they need to be applied to shallow soil and deep soil.

Response—Comment noted. Human health risk-based PRGs have been recalculated accordingly.

14. The most aggressive remedial alternative proposed and evaluated in the FS includes a component of "Selective Excavation/Offsite Disposal" (considered for Zones 1, 3, 4, 5, and 7). The proposed Selective Excavation targets any exceedance of the industrial/commercial direct exposure criteria and/or pollutant mobility criteria identified in *shallow* soils. Additional exceedances of these criteria are identified in *deep* soils in Zones 1, 2, 3, 4, 5, and 7. Although these exceedances have been identified, the FS does not evaluate any remedial action designed to mitigate the risks associated with them. EPA guidance stipulates that response actions be developed for each medium for which remedial action objectives have been established, and this must include deep soils. Permanent solutions are to be given preference in the selection of the remedy wherever practicable. Therefore, the Navy should develop a remedial alternative that addresses deeper contamination in areas where exceedances have been identified. Zones of particular concern in this regard are Zone 4 where lead was detected at 2080 mg/kg from 4 to 6 ft bgs at 13TB2A, and Zone 7 where lead was detected at high concentrations from 5 to 16 ft bgs, and benzo(a)pyrene was detected in elevated concentrations. Example of high detections within Zone 7 include; Pb at 13,300 mg/kg (5-6 ft bgs) at MW5-7RI/TB10-7RI, and Pb at 9770 mg/kg (14-16 ft bgs) at 20TB4). It is recognized that these exceedances in deep soil mostly lie below the water table at the site

(typically 5-7 ft bgs; see Figure 10-2 in the RI) and, therefore, removals would entail a greater scope than those considered for shallow soils. Nonetheless, removal of soils below the water table is entirely feasible from an engineering perspective.

Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

15. An evaluation of removal of deep soils showing exceedances, particularly in Zones 4 and 7 should be performed in order to meet the EPA requirement that the FS address remedial alternatives for all media, and in anticipation of the preference given to active and permanent measures to reduce risk.

Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

16. There is an inconsistency in the current proposal for Selective Excavation. The concentrations of benzo(a)pyrene and indeno(1,2,3-cd)pyrene are above ICDEC and/or PMC in shallow soil (2-4 ft bgs) in Zone 1 at TB4-1RI, but this area is not included among the targets for soil removals in the Selective Excavation alternative.

Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

17. As hot-spot removals are considered, one factor that should be included in the FS is the likelihood that the site characterization to date is exhaustive, and provides a reliable guide for the removals. Certainly the hot spots identified (e.g., Pb at 189,000 mg/kg in shallow soil at 20MW6 in Zone 7) are genuine hot spots, and there is some benefit in their removal. However, it is worth noting that much of the contamination of shallow soils appears to be widespread and “spotty.” That is, relatively high concentrations of contaminants of concern (COCs) are often found without any obvious correlation to neighboring exploration points (e.g., Pb in shallow soil at WE4A in Zone 4). The mechanism by which these hot spots developed is often unknown (e.g., grading with contaminated fill material?, discrete releases?, etc.). Therefore, it is worth emphasizing that a scattering of soil borings is likely to hit a scattering of contaminants, as has been observed. High concentrations may be quite local in extent, while undiscovered highs may lie almost anywhere between, including locations quite close to a measured low. One should not be misled by the contour plots of various contaminants provided in the RI (e.g., Drawing 8 for TPH in shallow soil, Drawing 10 for Pb in shallow soil). The smooth distributions of contaminants implied by these maps are very likely an artifact of the interpolation scheme used to create the contour maps from sparse data. In other words, the distributions are most likely much more heterogeneous.

Response—Comment noted. It is agreed that impacts to soil are likely to be “spotty” rather than as represented in the RI contour plots, which were computer generated using interpolating algorithms. The remedial alternatives in the FS are intended to focus on the impacted areas based on the available data. Data collected during the Remedial Action phase, such as post-excavation confirmatory samples and tiered monitoring samples, will be

used to evaluate whether additional or expanded actions are warranted to address areas of contamination that were not identified during the RI.

18. Minimization of the mobility of contaminants in shallow soils must be considered. Lead is mobile through physical transport of the particulates to which it is sorbed. Additionally, it appears that monitoring is appropriate to ensure that contaminants are not migrating to the Thames River.

Response—As agreed for the Site 20 FS, monitoring will also be included in remedial alternatives specifying institutional controls (ELUR only) or where excavation will still leave some COCs in-place due to accessibility restrictions. The remaining remedial alternatives already include a monitoring component. As noted for Site 20, the No Action alternative will be modified to be consistent with the DRMO FS (where No Action includes no remedial components).

19. The significance of ground-water contamination is inappropriately minimized by the fact that no ground-water use is anticipated. Contaminant transport, particularly to the adjacent Thames River, must be considered if the remedy is going to be protective. EPA recognizes, however, that the ground-water contamination identified to date is patchy, with no indication of well-defined plumes amenable to active treatment.

Response—With no ground-water use under current or any future use scenario, the focus for a ground-water assessment is to evaluate the potential risks to ecological receptors. Due to the tidal influence of the Thames River, the concentrations of dissolved COCs are subject to considerable dilution in ground water and in the near-shore area where mixing with surface water occurs. The RI concluded that the primary exposure route in the Thames River for contaminants from Lower Subase was via exposure of benthic invertebrates to sediment contaminants and that ground water posed minimal risk. The RI found that contaminant concentrations in ground water at Lower Subase were generally low, but that, even when ground water concentrations exceeded Connecticut surface water protection criteria, concentrations in the adjacent Thames River will be less than marine ambient water quality criteria for aquatic life due to the effects of tidal mixing and dilution. Based on weight of evidence of several factors, the RI concluded that the potential ecological risk was low for the aquatic community in the vicinity of Lower Subase. These observations include the following. Sediment contaminants in the vicinity of Subase were generally in the same concentration range observed both up- and downriver from Subase. Sediment testing demonstrated negligible toxicity of Thames River sediments collected near Lower Subase to benthic invertebrates. Differences in the benthic community observed longitudinally along the Thames River reflect the effects of other environmental variables, primarily salinity; that is, community composition is generally similar throughout the tidal River, although abundance appears to decrease in association with salinity from New London Harbor to the upstream tidal extent. Physical/chemical characteristics of the sediment indicate that the Acid volatile sulfide/simultaneously extracted suite of metals are not biologically available. Based on these findings the RI concluded that assessment of the potential risk to the aquatic community from ground water COCs was unnecessary. A tiered monitoring program for ground water was recommended to allow evaluation of any future need for action.

20. Ecological risks were found to be minimal across the entire Lower Subbase, principally because the site is and historically has been highly developed (e.g., Section 2.3.2, Page 2-13). The lingering issue for potential impact of the site to the natural ecosystem is the risk to receptors exposed to sediment in the Thames River. The sediment is potentially impacted by contamination delivered to the river via storm water discharge and discharging ground water. The FS clearly acknowledges potential impacts to the river system of this type (e.g., for Zone 1, Section 1.2.2, Page 1-5, notes the three storm water outfalls, and Section 1.6.1, Page 1-36, discusses transport pathways to the river). However, the appropriate response to this issue within the concept of a “tiered monitoring program” (e.g., Section 4.3.2.1, Page 4-6) is not developed. The outline of the tiered monitoring program should explicitly mention the likely scope of monitoring of storm drains, sediment, surface water and sediment in the near shore region of the river.

Response—The description of the tiered monitoring program has been expanded as recommended.

21. Tiered monitoring programs are proposed as alternatives for Zones 1, 4, and 7. It is stated in the “Overall Protection of Human Health and the Environment” sections that tiered monitoring programs would verify that zone-specific COCs do not adversely impact potential ecological receptors at downgradient/offsite areas. However, it is not specifically stated that contaminant detections in ground water will be screened against ecological criteria.

Response—Comment noted. See previous response.

22. It should be noted that many of the remedial options may be impacted owing to the complex underground system of steam and condensate pipes, storm water conveyance systems, and fuel pipelines which cover the facility.

Response—Comment noted. This is discussed throughout the FS.

23. All of the zones abut the Thames River, although the river bank habitat for wildlife is poor. In fact, the entire Lower Subbase is predominantly buildings, piers, parking lots, etc. Consequently, the terrestrial exposures to site-related contaminants would be very limited.

Response—Comment noted. This is discussed throughout the FS.

24. Numerous toxicity tests and bioaccumulation studies have been undertaken in the Thames River during the Phase II Remedial Investigation and these studies generally concluded a low to moderate risk from the site-related contaminants. Consequently, the human health risks are driving the cleanup more than the ecological risk. Although the ecological risk assessment noted some areas of potential risk to sediment dwelling organisms adjacent to Pier 17 in Zone 7, most of the Pier 17 sediments have been dredged, thereby potentially removing the potential risk in this area.

Response—Comment noted. This is discussed in the FS.

25. Each of the zones has its own storm water conveyance system or outfalls that drain excess precipitation from the Subbase into the Thames River. Often these can be a conduit for contamination to enter the river either by overland runoff or, alternatively, if the locally high water table seeps into the conveyance system. The document, however, fails to discuss the outfalls or the NSB's storm water management and compliance program. Additionally, the FS does not explain how the remedial options will address this potential source of contamination to the river.

Response—A stormwater monitoring program is ongoing at Lower Subbase to evaluate water quality of stormwater runoff. This program was designed to assess the level of contamination of stormwater discharged to the Thames River and the need for the most appropriate remedial actions relative to the stormwater conveyance system.

26. One of the alternatives evaluated for the ground water is intrinsic bioremediation. Consideration should be given to using enzymes and humic acids that can expedite the breakdown of organic contaminants.

Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

ATTACHMENT A – SPECIFIC COMMENTS

Comment No.	Page/Section	Comment/Response
1	Page ES-3	<p>Need to add Selective Excavation/Offsite Disposal alternatives for Zone 2, since the area exceeds TCLP for lead and must be addressed under federal and state hazardous waste management requirements.</p> <p>Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.</p>
2	Page 1-2, bullet 2	<p>Change “ARAR” to “ARARs” throughout the text unless you are talking about a single statute or regulation which is an ARAR.</p> <p>Response—Editorial comment noted. An “s” has been added to all plural acronyms, as applicable.</p>
3	Page 1-21, Section 1.3.7	<p>The text makes passing mention that “... organic compounds detected were reported to be representative of native background conditions...” Given the detail devoted to discussion of background inorganics (e.g., Tables 1-1 to 1-3), this statement regarding organics should be expanded with more discussion and supporting tables. In particular, what “native background” levels were established for organic compounds such as chlorinated VOCs? “Background” values of organic compounds are usually taken to be zero because of their anthropogenic origin.</p> <p>Response—The text has been modified as follows to clarify the discussion of native background conditions:</p> <p style="margin-left: 40px;"><i>In April 1995, Atlantic Environmental Services completed studies to characterize naturally occurring background concentrations of inorganics. The Work Plan and sampling locations were developed and selected in cooperation with EPA, CTDEP, and the Navy. The objective of this study was to establish site-specific preliminary soil screening levels based on soil background for inorganics at NSB-NLON. Samples were collected at eight forested upland locations which exhibited no evidence of prior anthropogenic disturbance. At each location, a shallow (0-2 ft bgs) and deep (2-4 ft bgs) soil sample was analyzed for TCLP metals, TAL inorganics, TCL organics (total VOCs and total SVOCs), and pesticides/PCBs. Organic compounds and pesticides were analyzed to further confirm that the sampled locations were representative of undisturbed conditions, that is, that no prior dumping or waste disposal had occurred at these locations. Background concentrations of organic compounds are typically taken to be zero because of their anthropogenic origin; thus elevated concentrations of these compounds would serve as an indication that the location was not representative of undisturbed conditions. VOCs and SVOCs were not detected in any of the 16 soil samples; the only VOCs were also detected in the blanks and were typical laboratory contaminants, e.g., acetone and methylene chloride. Although low concentrations of DDT and DDE were detected at two locations, the concentrations were slightly above the method detection limit. Atlantic Environmental Services and comments from EPA and CTDEP indicate that, based on the absence of detectable levels of organic compounds, all 8 locations were accepted as indicative of background conditions for inorganics.</i></p>
4	Page 1-27, Section 1.4.1	<p>Discuss how soil from the area exceeds Connecticut PMC for lead and arsenic.</p> <p>Response—Section 1.4 (and subsections) summarizes the nature and extent of constituents for each zone as discussed in the RI. Comparison of data to ARARs is fully discussed in Section 2.4.4.</p>
5	Page 1-27, Section 1.4.2	<p>Discuss how soil from the area exceeded both TCLP and Connecticut PMC for lead.</p> <p>Response—See response to Comment No. 4.</p>
6	Page 1-28, Section 1.4.3	<p>Discuss how soil from the area exceeded both TCLP and Connecticut PMC for lead.</p>

Comment No.	Page/Section	Comment/Response
		Response —See response to Comment No. 4.
7	Page 1-28, Section 1.4.4	Discuss how soil from the area exceeded both TCLP and Connecticut PMC for lead.
		Response —See response to Comment No. 4.
8	Page 1-29, Section 1.4.5	Discuss how soil from the area exceeded the Connecticut PMC for lead.
		Response —See response to Comment No. 4.
9	Page 1-30, Section 1.4.7	Discuss how soil from the area exceeded TCLP for lead.
		Response —See response to Comment No. 4.
10	Page 1-32, Paragraph 1	Revise paragraph, unless natural attenuation will address lead and arsenic contamination present in the zone.
		Response —Comment noted. The paragraph has been revised to state: <i>...that natural attenuation may be viable for organic COCs in soil and ground water due to....</i>
11	Page 1-32, Paragraph 4	Remove this paragraph, since natural attenuation will not address lead levels which exceed TCLP and, therefore, must be managed as hazardous waste.
		Response —The paragraph has been modified in accordance with the previous response. It is agreed that natural attenuation would not be effective for mitigating elevated levels of lead within a reasonable timeframe. However, the RI did report that natural attenuation may be viable for organic COCs in Zone 2 soil. The remedial alternatives for Zone 2 will not include natural attenuation for lead.
12	Page 1-33, Section 1.5.4	In this and subsequent sections, the discussion of mobility of inorganic constituents invokes the phrase, "The mobility of some of the inorganic constituents may be supported by the ground-water data and TCLP soil data." This seems to imply that the <i>data</i> are ambiguous with regard to the mobility issue. However, the uncertainty is associated more with the <i>criteria</i> used to assess the data. It is more appropriate to state that the data support the conclusion that the inorganics may be mobile. The syntax adopted in Section 1.5.5, Page 1-34, for example, is more precise: "Analytical data...indicated...that inorganic constituents may be migrating to ground water..."
		Response —Comment noted. The last sentence in Paragraph 2 of Section 1.5.4 has been modified to read as follows: <i>The analytical data indicate that lead may be migrating from soil to ground water.</i> In addition, similarly phrased statements which appear in the second paragraph of Sections 1.5.1 (Zone 1), 1.5.2 (Zone 2), 1.5.3 (Zone 3), 1.5.4 (Zone 4), 1.5.5 (Zone 5), 1.5.6 (Zone 6), and 1.5.7 (Zone 7) have been appropriately modified.
13	Page 1-33, Paragraph 2	Remove this paragraph, since natural attenuation will not address lead levels which exceed TCLP and, therefore, must be managed as hazardous waste.
		Response —See response to Comment No. 11.
14	Page 1-33, Paragraph 5	Remove this paragraph, since natural attenuation will not address lead levels which exceed TCLP and, therefore, must be managed as hazardous waste.
		Response —See response to Comment No. 11.
15	Page 1-34, Paragraph 3	Revise paragraph, unless natural attenuation will address lead contamination present in the zone.
		Response —See response to Comment No. 11.
16	Page 1-35, Paragraph 3	Remove this paragraph, since natural attenuation will not address lead levels that exceed TCLP and, therefore, must be managed as hazardous waste.
		Response —See response to Comment No. 11.
17	Page 1-36, Paragraph 4	In the first sentence, change "as wells" to "as well" (make this change at the beginning of Sections 1.6.2 through 1.6.7).
		Response —Comment noted. The typo has been corrected as requested.

Comment No.	Page/Section	Comment/Response
18	Page 1-36, Paragraph 5	Revise the second sentence to address whether the pavement is a sufficient barrier to meet state direct exposure criteria. If not, then potential human exposure must be addressed. Response —Comment noted. The text has been modified accordingly
19	Page 1-37, Paragraph 2	In the last sentence, change “is expected to be reduced” to “is required to be controlled under hazardous waste management standards.” Response —Comment noted. The text has been modified accordingly.
20	Page 1-37, Paragraph 3	Remove this paragraph, since a pavement cover does not meet federal/state hazardous waste capping standards. Response —Comment noted. Text has been reworded as follows: <i>...These soils are not presently exposed and are not likely to be exposed in the future. Under Connecticut regulations, the potential for exposure may be limited if contaminated soil is more than 2 ft below a paved surface and thus, are considered inaccessible.</i>
21	Page 1-38, Paragraph 3	Remove this paragraph, since a pavement cover does not meet federal/state hazardous waste capping standards. Response —Comment noted. See response to Comment No. 20.
22	Page 1-39, Paragraph 3	Remove this paragraph, since a pavement cover does not meet federal/state hazardous waste capping standards. Response —Comment noted. See response to Comment No. 20.
23	Page 1-39, Paragraph 6	Revise the second sentence to address whether the pavement is a sufficient barrier to meet state direct exposure criteria. If not, then potential human exposure must be addressed. Response —Comment noted. See response to Comment No. 20.
24	Page 1-40, Paragraph 3	Revise the second sentence to address whether the pavement is a sufficient barrier to meet state direct exposure criteria. If not, then potential human exposure must be addressed. Response —Comment noted. See response to Comment No. 20.
25	Page 1-41, Paragraph 3	Remove this paragraph, since a pavement cover does not meet federal/state hazardous waste capping standards. Response —Comment noted. See response to Comment No. 20.
26	Page 1-46, Paragraph 3	In the third sentence, change “an ROD” to “a ROD.” Response —Comment noted. The use of prepositions before acronyms will be minimized.
27a	Page 2-1, Section 2.2	Change the two sentences in the first paragraph from “is similar to the CERCLA process. Pursuant to SARA and the NCP, the development and evaluation of remedial alternatives under CERCLA includes...ARAR” to “complies with CERCLA standards, including...ARARs.” Response —Comment noted. The text has been modified accordingly.
27b		Either remove the third sentence in the first paragraph or change it from “neither SARA nor the NCP” to “SARA and the NCP” (the nine criteria in the NCP are the standard for determining whether a particular remedy provides a sufficient cleanup). Response —Comment noted. The third sentence has been deleted.
27c		In the second paragraph, first sentence, remove “, techniques, materials, equipment, and methods.” In the second sentence, change “public health, welfare,” to “human health.” Response —Comment noted. The text has been modified accordingly.
27d		In the third paragraph, change the second and third sentences to: “The remedial alternative must attain applicable or relevant and appropriate requirements under federal environmental laws and state environmental or facility siting laws or provide grounds for invoking one of the waivers permitted under the statute.” Response —Comment noted. The text has been modified accordingly.
28	Page 2-2, Paragraph 1	Change the sentence to: “CERCLA Section 121, codified at 40 CFR Part 300.400(e), states that removal or remedial actions conducted entirely onsite do not require Federal, State, or local permits. However, any substantive, non-administrative requirements of statutes and regulations which include permitting requirements must be complied with or waived.” Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
29	Page 2-2, Section 2.2.1	In the first bullet and second bullets change "substantive environmental protection" to "substantive Federal environmental and State environmental and facility siting." Response —Comment noted. The text has been modified accordingly.
30a	Page 2-2, Section 2.2.2	In the first sentence, change the beginning of the sentence to: "ARARs for remedial action alternative can be classified into..." Response —Comment noted. The text has been modified accordingly.
30b		Under No. 1, second sentence, remove the examples provide and replace with "the State of Connecticut Remediation Standard Regulations." Response —Comment noted. The text has been modified accordingly.
30c		Under No. 2, second sentence, change "federal/state/local wetlands protection guidelines" to "federal/state wetlands protection standards." Response —Comment noted. The text has been modified accordingly.
31	Page 2-3	Remove the third and fourth bullets since these are To Be Considered (TBC), not ARARs. Response —Comment noted. The text has been modified accordingly.
32	Page 2-3, Section 2.2.3	Change the section to: "Federal and state guidance documents or advisories do not have the status of ARARs and are not enforceable. However, they may be considered when developing remedies which will be protective of human health and the environment." Response —Comment noted. The text has been modified accordingly.
33	Page 2-3, Section 2.2.4	Change the first paragraph to: "To comply with CERCLA, a remedy must either meet all identified ARAR standards or qualify for a waiver. Pursuant to Section 300.430(f)(3), there are several criteria under which an ARAR may be waived, if the standard cannot be attained." The last sentence of the original paragraph is not accurate since the cost-effectiveness of a remedy is not a grounds for a waiver. Response —Comment noted. The text has been modified accordingly.
34	Page 2-4, Section 2.2.5.1	This section includes a discussion of all of the Chemical-Specific ARARs that are listed in Table 2-1, Summary of Chemical-Specific ARARs and TBC Guidance. The Federal Clean Water Act is listed on Table 2-1, but is not discussed in the text in Section 2.2.5.1. The text in this section should be updated to include a discussion on the Federal CWA. Response —Comment noted. The Federal Clean Water Act has been moved to Section 2.2.5.2 (Location-Specific ARARs) and has been removed from Table 2-1 as a Chemical-Specific ARAR.
35a	Page 2-4, Section 2.2.5.1	Remove the Federal Safe Drinking Water Act since the site is in a GB zone. In addition, human health risk calculations are TBC not an ARAR. You may chose to add "and To Be Considered" after "Requirements" in the title and in the last sentence of the first paragraph change "ARAR were considered" to "ARARs and TBCs were considered." Also, in the last sentence of the section, change "ARAR are described" to "ARARs and TBCs are described." Response —Comment noted. The first and third bullets under Section 2.2.5.1 has been deleted. The Federal Safe Drinking Water Act has been removed from this section and Table 2-1. The subsection under Section 2.2.5.1 entitled "Human Health Risk Calculations for Soil and Sediment" has been moved to Section 2.2.5.4 (To Be Considered Guidance).
35b		Remove the paragraphs on the Federal Safe Drinking Water Act since the site is in a GB zone and the Act does not apply. Response —Comment noted. The text has been modified accordingly.
36a	Page 2-6, Paragraph 2	The first sentence is not accurate since, the RDEC is still applicable, but is being addressed through an ELUR. Also the Base cannot meet the conditions for creating a state ELUR under the Remediation Regulations until such time that a deed or lease is created. At this time all the Base can do is record and enforce the ELUR under the Base Master Plan or other base-wide land use control mechanism and commit to recording the ELUR if a deed or lease for the area is ever created.

Comment No.	Page/Section	Comment/Response
		<p>Response—This paragraph accurately states that where an appropriate Environmental Land Use Restriction is implemented, the site is not required to meet residential direct exposure criteria, but will still need to meet the industrial/commercial criteria. The following text has been added after the first sentence in this paragraph as additional clarification regarding compliance and “inaccessible” soil:</p> <p><i>Even where ELUR is implemented, CTDEP Remediation Standard Regulations stipulate that remedial measures must ensure that COCs are less than ICDEC in the first 2 ft if the soil is paved or covered by a building, or in the first 4 ft of exposed soil.</i></p>
36b		<p>The second sentence also is not accurate, since land under a Land Use Restriction may still be required to have soil in the first 2 ft to meet direct exposure criteria.</p>
37	Page 2-7, Paragraph 2	<p>Response—See previous response.</p> <p>In the fourth sentence, remove “(approved by the CTDEP Commissioner)” since at NPL sites EPA would give the approval (based on the Agency’s interpretation of the Connecticut regulations).</p>
		<p>Response—Comment noted. The text has been modified accordingly.</p>
38	Page 2-7, Paragraph 3	<p>Move the Human Health Risk Calculations to the TBC section.</p>
		<p>Response—Comment noted. Human Health Risk Calculations have been changed to To Be Considered status.</p>
39	Page 2-8, Section 2.2.5.2	<p>This section includes a discussion of all of the Location-Specific ARARs that are listed in Table 2-2, Summary of Location-Specific ARARs and TBC Guidance. The Federal Coastal Zone Management Act is not included in either the discussion in Section 2.2.5.2 or Table 2-2. This ARAR should be included in both places in the chapter. Also, the Federal Endangered Species Act is listed on Table 2-2, but is not discussed in the text in Section 2.2.5.2. The text in this section should be updated to include a discussion on the Federal Endangered Species Act.</p>
		<p>Response—Comment noted. The Federal Coastal Zone Management Act has been included in the discussion in Section 2.2.5.2, Table 2-1, and alternative-specific ARAR tables in Chapters 4 through 10. The Federal Endangered Species Act has been removed from the table and will not be discussed in this section. Potential risk to any endangered species has been covered by the Connecticut Endangered Species Act.</p>
40	Page 2-8, Paragraph 1	<p>Change the last sentence before the bullets to: “The following are some of the location-specific ARARs that were identified...” or reference all of the ARARs included in EPA’s revised alternative-specific tables (in Chapter 4). In particular, wetlands and flood plain ARARs were omitted.</p>
		<p>Response—Comment noted. The last sentence before the bullets has been modified as follows:</p>
		<p><i>The following are some of the location-specific ARARs that were identified...</i></p>
		<p>Wetlands and floodplain ARARs have been added to this section.</p>
41a	Page 2-8, Paragraph 2	<p>In the first sentence, change “the coastal boundary” to “the designated coastal zone.”</p>
		<p>Response—Comment noted. The text has been modified accordingly.</p>
41b		<p>In the second sentence, change “intent” to “substantive requirements” and add at the end add “(but the Navy will consult with applicable officials concerning coastal zone issues).”</p>
		<p>Response—Comment noted. The text has been modified accordingly.</p>
42a	Page 2-8, Paragraph 3	<p>There are no known federal endangered species at the base. One of the state species is a fish which lives in the Thames. There are five species of state listed plants which occur may occur on the base (see the FS for DRMO or Area A Downstream).</p>

Comment No.	Page/Section	Comment/Response
		<p>Response—Comment noted. The paragraph has been modified to read as follows:</p> <p><i>Six state-listed Endangered, Threatened, or Special Concern species have been identified in the vicinity of NSB-NLON. This includes one fish species of the Thames River (Atlantic sturgeon [Acipenser oxyrinchus]) and five plant species in the Area A Downstream (golden Alexander [Zizia aptera], seaside crowfoot [Ranunculus cymbalacia], creeping bush-clover [Lespedeza repens], crooked-stem aster [Aster prenanthoides], and Crawford's sedge [Carex crawfordii]). Although these species have the potential to be present in the vicinity/downgradient of Lower Subase, the 1997 Integrated Natural Resources Endangered Species Act Management Plan for NSB-NLON indicated no Federal or State Endangered, Threatened, or Special Concern species at NSB-NLON or in adjacent Navy Housing areas. Remedial actions involving excavation will be coordinated with the NSB-NLON Natural Resources Manager prior to the start of project; and the Natural Resources Manager will specify additional surveys, if any, for endangered and threatened species or significant natural communities.</i></p>
42b		<p>Change the last sentence to: "The Navy will consult with applicable state officials to address potential impacts to state endangered and threatened species from the proposed remedial measures."</p>
		<p>Response—Comment noted. The text has been modified accordingly.</p>
43	Page 2-8, Paragraph 4	<p>The National Historic Preservation Act is not an ARAR unless you have any sites or suspected sites in the area of the Remedial Action.</p> <p>Response—Comment noted. No known or suspected historic sites are located at Lower Subase. Therefore, the National Historic Preservation Act has been removed from this section and will not be included in the alternative-specific ARAR tables in Chapters 4 through 10.</p>
44	Page 2-9, Section 2.2.5.3	<p>This section includes a discussion of all of the Action-Specific ARARs that are listed in Table 2-3, Summary of Action-Specific ARARs and TBC Guidance. The Connecticut Hazardous Waste Management Regulations and the Connecticut Air Toxics Control Regulations are listed on Table 2-3, but are not discussed in the text in Section 2.2.5.3. The text in this section should be updated to include a discussion on these regulations.</p> <p>Response—Comment noted. The Connecticut Hazardous Waste Management Regulations and the Connecticut Air Toxics Control Regulations have been in the text in Section 2.2.5.3, Table 2-1 and alternative-specific ARAR tables in Chapters 4 through 10.</p>
45a	Page 2-9, Bullet 1	<p>Instead of citing RCRA, cite the Connecticut Hazardous Waste Remediation Standards, since Connecticut is a delegated state and has incorporated most of RCRA into their regulations.</p>
		<p>Response—Comment noted. The RCRA discussion has been replaced with a description of the Connecticut Hazardous Waste Remediation Standards.</p>
45b		<p>In the second bullet, move Section 404 of the CWA into the location-specific section, along with the Rivers and Harbors Act in the third bullet.</p> <p>Response—Comment noted. Section 404 of the Clean Water Act and the Rivers and Harbors Act has been moved into the location-specific section. The second bullet has been modified as follows:</p> <p><i>Federal Clean Water Act (33 USC 1342; 40 CFR 122-125).</i></p>
45c		<p>In the fifth bullet, the name of the regulation is missing, there just is a partial citation. State that Section 22a-426 are the Connecticut Water Quality Standards.</p> <p>Response—Comment noted. The fifth bullet has been modified as follows:</p> <p><i>State of Connecticut Water Quality Standards (Connecticut General Statutes Section 22a-426).</i></p>

Comment No.	Page/Section	Comment/Response
46a	Page 2-9, Paragraph 2	<p>Instead of discussing RCRA, have the section under the Connecticut Hazardous Waste Remediation Standards (since Connecticut is a delegated state and has incorporated most of RCRA into their regulations). In the third sentence, change "landfill permitting" to "capping of hazardous waste." Change the last sentence to "These requirements are applicable to a CERCLA action when the COCs are listed in the regulations or exhibit hazardous waste characteristics, as is the case in Zones 2, 3, 4, and 7 within the Lower Subbase OU. In the zone where characteristic hazardous wastes are present the wastes and associated contaminated media must either be capped or treated under these applicable standards, or removed and disposed of in a permitted hazardous waste landfill."</p> <p>Response—The Connecticut Hazardous Waste Management Regulations "incorporate by reference" much of the RCRA regulations with various modifications; this section has been modified to reflect this fact. Edits have been made as follows:</p> <p style="text-align: center;">Connecticut Hazardous Waste Management Regulations</p> <p><i>Connecticut Hazardous Waste Management Regulations (CSAR Section 22a-449(c)) incorporate by reference all the essential sections of the Code of Federal Regulations covering RCRA. As such, they regulate various waste management activities to promote resource conservation and to protect human health and the environment. RCRA serves as the basis for development of technology-based requirements governing the identification and listing, storage, transportation, and disposal of hazardous wastes at active or proposed hazardous waste facilities. This encompasses activities of generators, transporters, and storage or disposal facilities. Identification of RCRA regulated wastes is based on characteristics of ignitability, corrosivity, reactivity, or toxicity as defined in 40 CFR 261, Subpart C; regulatory levels for specific contaminants based on toxicity are contained in Appendix B to 40 CFR 261. Overall RCRA requirements include ground-water protection, capping of hazardous waste, design and performance standards, standards for waste piles and surface impoundments, and permitting. These requirements are applicable to a CERCLA action when the COCs are listed in the regulations or exhibit hazardous waste characteristics, as is the case in portions of Zones 2, 3, 4, and 7 at Lower Subbase. Where characteristic hazardous wastes are present, RCRA stipulates that the wastes and associated contaminated media must either be capped or treated, or removed and disposed of in a permitted hazardous waste landfill.</i></p> <p><i>Depending on the selected remedial alternatives for the Lower Subbase, potential action-specific ARAR under Connecticut Hazardous Waste Management Regulations and RCRA could include:</i></p> <ul style="list-style-type: none"> • CSA 22a-449(c)-102 and 40 CFR 262 (generator requirements for manifesting waste for offsite disposal) • 40 CFR 264.94 through 264.101 (general monitoring requirements) • CSA 22a-449(c)-105(c) and 40 CFR 264 Subpart F (ground-water monitoring) • 40 CFR 264 Subpart I (use and management of containers) • 40 CFR 264.1030 through 264.1036, Subpart AA (air emission standards for process vents) • CSA 22a-449(c)-103 and 40 CFR 263 (transporter requirements for offsite disposal) • CSA 22a-449(c)-108 and 40 CFR 268 (land disposal restrictions).

Comment No.	Page/Section	Comment/Response
46b		<p>All of the citations in the bullets should be to the applicable section of the Connecticut regulations rather than the RCRA cites.</p> <p>Response—Note that a new second bullet has been added under the introductory paragraph to Section 2.2.5.3:</p> <ul style="list-style-type: none"> • <i>Connecticut State Agency Regulations Section 22a-449(c)</i> <p>As appropriate, citations to the applicable section of the Connecticut regulations have been added to the bullets as indicated in response to Comment No. 46a above.</p> <p>In the first bullet change “Manifesting” to “Handling.”</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
47	Page 2-10, Bullet 1	<p>Will any of the remedies involve the use of containers? If not remove the bullet. Remove the fourth bullet since transporter requirements are not ARARs.</p> <p>Response—Comment noted. As previously stated, the RCRA discussion has been replaced with a description of the Connecticut Hazardous Waste Remediation Standards. All potential action-specific ARARs under the Connecticut Hazardous Waste Remediation Standards have been listed in this section. Alternative-specific ARAR tables have been included in Chapters 4 through 10.</p>
48a	Page 2-10	<p>Clean Water Act section - Section 404 is a location-specific ARAR. Furthermore, if the remedial action does not propose to discharge into a POTW, the standards should not be cited as an ARAR. Specific comments on the bullets are:</p> <p>Response—Comment noted. The summary of the Clean Water Act has been moved to Section 2.2.5.2, Location-Specific ARARs. The third bullet will not be retained because no alternatives were developed that include discharge to a publicly-owned treatment works. The following text has been added to Section 2.2.5.2:</p> <p style="text-align: center;"><i>Clean Water Act, Section 404</i></p> <p><i>Section 404 of the Clean Water Act regulates the discharge of dredged or fill materials into a water of the United States. Remedial action and monitoring activity in the intertidal or subtidal zone will need to meet the substantive standards of Section 404. This includes a finding that the proposed remedial action is the best practicable alternative to avoiding, minimizing or mitigating impacts to protected aquatic habitats. Remedial actions at Lower Subbase will be conducted such that potential adverse impacts to the Thames River are minimized to the extent practicable.</i></p>
48b		<p>In the first bullet, AWQCs are only action-specific ARARs if you are using them to develop monitoring standards in the River or its sediments. If you are using AWQC’s to develop sediment or surface water cleanup levels then they would be chemical-specific ARARs.</p> <p>Response—Comment noted. The summary of the Clean Water Act has been moved to Section 2.2.5.2, Location-Specific ARARs. The first bullet will not be retained because Ambient Water Quality Criteria were not used for the development of sediment PRGs. Similarly, the second bullet pertaining to NPDES has been deleted because no alternatives were developed that include discharge to a surface water.</p>
48c		<p>In the third bullet the correct citation for the pretreatment standards is 40 CFR 403. Do not cite this standard as an ARAR unless it is proposed to discharge into a POTW.</p> <p>Response—See response to Comment No. 48a.</p>
48d		<p>In the fourth bullet move Section 404 into location-specific ARARs section.</p> <p>Response—See response to Comment No. 48a.</p>
49	Page 2-11, Bullet 1	<p>Once this is moved to location-specific ARARs, change the last sentence from “may involve Section 404 permitting through the U.S. Army Corps of Engineers” to “, and monitoring activity in the intertidal or subtidal zone will need to meet the substantive standards of Section 404. This includes a finding that the proposed remedial action is the best practicable alternative to avoiding, minimizing or mitigating impacts to protected aquatic habitats.”</p>

Comment No.	Page/Section	Comment/Response
50	Page 2-11, Paragraph 2	Response —Comment noted. The text has been modified accordingly. In the last sentence, change “may be regulated by permit through the U.S. Army Corps of Engineers under this act” to “, or monitoring activities within the Thames River will meet the substantive requirements under this Act.”
51a	Page 2-11, Paragraph 3	Response —Comment noted. The text has been modified accordingly. Change the title to “Connecticut Water Pollution Control Regulations.”
51b		Response —Comment noted. The text has been modified accordingly. In the third sentence, change “requires a CTPDES permit” to “needs to meet the substantive requirements of the regulations.” In the fourth sentence, change “permit” to “regulations.”
52	Page 2-11, Paragraph 4	Response —Comment noted. The text has been modified accordingly. Remove the last sentence since the OU is not in a GA ground-water zone.
53	Page 2-11, Paragraph 5	The AWQC are promulgated standards and therefore would be an ARAR, not a TBC. If they are being used to set monitoring standards for the Thames and its sediments they are action-specific. Response —Comment noted. The Ambient Water Quality Criteria were not used for the development of sediment PRGs and will, therefore, be removed from this section. In addition, the Clean Air Act and Connecticut Air Pollution Control Act sections in Section 2.2.5.4 have been moved to Section 2.2.5.3, Action-Specific ARARs. The first paragraph under Section 2.2.5.4 has been modified as follows: <i>Federal and state guidance documents or criteria that are not generally enforceable, but are advisory, do not have the status of potential ARARs. Guidance documents or advisories to be considered in determining the necessary level of cleanup for protection of human health or the environment may be used where no specific ARARs exist for a chemical or situation, or where such ARARs are not sufficient to afford protection. The following To Be Considered guidance was identified for Lower Subase:</i> <ul style="list-style-type: none"> • Human health risk calculations for soil and sediment The section on Page 2-7 entitled “Human Health Risk Calculations for Soil and Sediment,” which includes a summary of cancer slope factors and reference doses, has been moved to follow the above text.
54	Page 2-12, Paragraph 1	Change the last sentence to: “The Ambient Water Quality Criteria has been used to help assess the success of the remedial action through monitoring of surface water and sediment quality in the Thames River.” Response —Comment noted. The text has been modified accordingly.
55	Page 2-12, Paragraph 2	Move this section to the Action-Specific ARARs, promulgated statutes are not TBCs. Remove the first four sentences. In the fifth sentence, remove “as part of a State Implementation Plans or as guidance To Be Considered” and “(whether as a new point source or as a modification of the existing point source).” Response —Comment noted. The text has been modified accordingly.
56	Page 2-12, Paragraph 3	Move this section to the Action-Specific ARARs, promulgated statutes are not TBCs. Response —Comment noted. The text has been modified accordingly.
57	Page 2-13, Paragraph 1	If sediments in the stormwater system are not addressed in this FS, will a possible determination that the sediments are contaminated require the reopening of this ROD to address the problem. If contaminated material is to be excavated and removed as part of this action, wouldn't it also make sense to remove any contaminated sediments at the same time? Response —Comment noted. The facility has taken on this responsibility under the Facility Storm Water Management Plan. If removal of contaminated sediment from the stormwater system can be efficiently accomplished during implementation of the selected remedial action for Lower Subase, this will be considered at that time.

Comment No.	Page/Section	Comment/Response
58	Page 2-13, Section 2.3.1, Paragraph 3	<p>If the value "0.16 $\mu\text{g}/\text{Kg}$" is in total toxic equivalent (TEQ) of dioxin, i.e., first line 2,3,7,8-tetrachlorodibenzo-p-dioxin or TCDD), please note this in the text.</p> <p>Response—Comment noted. The value "0.16 $\mu\text{g}/\text{Kg}$" is total toxic equivalent of dioxin with respect to 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD). This has been noted in the text.</p>
59	Page 2-13, Section 2.3.1, Paragraph 3	<p>The current EPA policy for dioxin residential-based cleanup is that the TEQ should be lower than 1 part per billion (ppb). The corresponding cleanup range for commercial/industrial exposures is between 5 and 20 ppb. Therefore, the justification for not considering dioxin in PRG development should be that the detected quantity is less than EPA's 1 ppb starting point for residential-based cleanup (re: EPA directive "Approach for Addressing Dioxin in Soil at CERCLA and RCRA Sites," 13 April 1998, 9200.4-26). Please omit the discussion regarding the dioxin concentration compared to other Superfund sites and add text addressing this comment.</p> <p>Response—This paragraph has been modified as follows:</p> <p><i>Dioxin was detected in 1 (20MW6) of 6 soil samples from Zone 7. The toxic equivalent (TEQ) for this sample was 0.16 $\mu\text{g}/\text{kg}$ (Atlantic Environmental 1995a); this is below both EPA's commercial/industrial-based (5 $\mu\text{g}/\text{kg}$) and residential-based (1 $\mu\text{g}/\text{kg}$) clean-up directive (re: EPA directive "Approach for Addressing Dioxin in Soil at CERCLA and RCRA Sites," 13 April 1998, 9200.4-26). Consequently, no PRG was developed for dioxin at Lower Subase.</i></p>
60	Page 2-13, Section 2.3.1, Paragraph 3	<p>Are the data for the dioxin analyses accurate? Please note the reason why last line the data were not validated and if any assessment of their quality was completed. Using data of unknown quality to conclude whether dioxin should be evaluated further is not appropriate.</p> <p>Response—Twenty-five percent of the samples analyzed in the Final Site Inspection Report for Pier 33 and Berth 16/Former Incinerator (Atlantic Environmental 1995a) were validated by META Environmental, Inc. The validation reports were included as Appendix C to the Site Inspection Report (Atlantic Environmental 1995a). Three dioxin analyses were validated. All factors including holding times, recovery time, recovery rates, calibration procedures, and instrument peak resolution were within control standards. Toxic equivalent calculations were verified. The data validator made no recommendations, no validation qualifiers were added, and no data were rejected.</p>
61	Page 2-14, Section 2.3.2	<p>The text states, "No ecological risk COC were retained in this FS." While it is understood that the relatively low ecological risks identified in the RI imply that the selection of remedial alternatives will not be driven by ecological risk considerations, it must be acknowledged that there remain concerns about potential impacts of ground-water or stormwater discharge to the river. These concerns may, at the least, influence the design of the monitoring program selected</p> <p>Response—Available data indicate that the potential ecological risk associated with discharge of ground water or stormwater to the Thames River is low. However, due to the uncertainties associated with the data, a tiered monitoring program has been recommended as part of the recommended remedial alternatives.</p>
62a	Page 2-14, Section 2.3.2	<p>A new section should be inserted to discuss the Connecticut Hazardous Waste Management Standards. These regulations have been the controlling standards for setting cleanup goals in Zones 2, 3, 4, and 7 where characteristic hazardous waste (lead exceeding TCLP is present). Standards for either capping, treating, or removing the lead and all contaminated media will have to be met.</p>

Comment No.	Page/Section	Comment/Response
		<p>Response—The following modifications have been made. Section 2.3.3 in the Draft will become Section 2.3.4; the following phrase has been added to the beginning of the first sentence of this section:</p> <p><i>For zones where no RCRA characteristic waste were identified, site-specific...</i></p> <p>A new Section 2.3.3 has been added as follows:</p> <p>2.3.3 Connecticut Hazardous Waste Management Standards/Resource Conservation and Recovery Act Regulatory Levels</p> <p><i>Site-specific soil data (TCLP concentrations) were compared to toxicity-based regulatory levels for those RCRA contaminants listed in Appendix B to 40 CFR 261 and referenced in the Connecticut Hazardous Waste Management regulations. Locations where contaminants exceed these regulatory levels are determined to have RCRA characteristic wastes for which remedial actions must be consistent with Connecticut Hazardous Waste Management regulations; such actions may include onsite capping or treatment, or removal of the waste and contaminated media and disposal at an appropriately permitted facility.</i></p>
62b		<p>Reorder the section on the Connecticut Remediation Standards as 2.3.4.</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
63a	Page 2-15, Paragraph 2	<p>Reorder the bullets so that ARARs compliance is first (since compliance with Connecticut Hazardous Waste Management requirements will be the primary driver in determining the remedy in 4 of the 7 zones).</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
63b		<p>Before discussing Human Health and Ecological Risk-Based PRGs discuss compliance with Connecticut Hazardous Waste Management Standards, then the Connecticut PRGs.</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
64	Page 2-15, Section 2.4.1, Paragraph 5	<p>As discussed in the first general comment, use of unvalidated data in HHRA calculations is a nuance. Please describe how the “recalculated” risk values differ from those presented in the HHRA. In particular, described any differences between the HHRA and Feasibility Study lists of COCs.</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
65	Page 2-16, Section 2.4	<p>This section presents the human health based PRGs. Although Chapter 1 of the FS summarizes lead risks to human health, no soil PRG is presented for lead on Page 2-16. The derivation of soil lead PRGs is necessary because it needs to be applied to both shallow soil and deep soil.</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
66	Page 2-17, Paragraph 1	<p>In the first sentence, remove “federal and.”</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
67a	Page 2-17, Paragraph 2	<p>It should be noted that the Connecticut Remediation goals are only applicable in those zones (1, 5, and 6) where characteristic waste is not present and does not require cleanup under the Connecticut Hazardous Waste Management regulations or they are applicable where contamination exceeding the PRGs is still present after the regulated hazardous waste has been capped, treated, or removed.</p>

Comment No.	Page/Section	Comment/Response
		<p>Response—A new subsection has been inserted at Page 2-16 following the subsection Ecological Risk-Based Preliminary Remediation Goals. The new section will read as follows:</p> <p>Connecticut Hazardous Waste Remediation Goals</p> <p><i>The State of Connecticut has been authorized to administer the RCRA program under their Hazardous Waste Management Regulations. The Connecticut regulation incorporates by reference the regulatory levels established under RCRA in Appendix B. Lead is the only COC listed under RCRA which exceeds the regulatory criteria and was categorized as a RCRA characteristic waste; the soil regulatory level for lead is 5.0 mg/L based on TCLP extraction analyses. Locations exceeding this level may require remediation in the form of capping, treatment, or removal and appropriate disposal offsite. Such locations were identified in Zones 2, 3, 4, and 7.</i></p> <p>The following introductory material has been inserted at the beginning of the next subsection, Connecticut Preliminary Remediation Goals:</p> <p><i>The following Connecticut PRGs are applicable at those locations/zones where contamination exists, but RCRA characteristic wastes have not been identified. They may also apply where RCRA characteristic waste has been capped, treated or removed, but residual contamination still exceeds Connecticut remediation standards.</i></p>
67b		<p>In the text of the paragraph, the first sentence is not accurate since the RDEC is still applicable, but is being addressed through an ELUR. Also the Base cannot meet the conditions for creating a state ELUR under the Remediation Regulations until such time that a deed or lease is created. At this time all the Base can do is record and enforce the ELUR under the Base Master Plan or other base-wide land use control mechanism and commit to recording the ELUR if a deed or lease for the area is ever created.</p>
		<p>Response—Comment noted. This paragraph accurately states that where an appropriate ELUR is implemented, the site is not required to meet residential Direct Exposure Criteria, but will still need to meet the industrial/commercial criteria. The text has been modified as follows:</p> <p><i>RDEC are more stringent than ICDEC, but are not applicable where ELURs exist or will be implemented in conjunction with the selected remedial action. Under the Connecticut remediation standards, ELUR cannot be established until a deed is created for the parcel. Because there are currently no deeds for NSB-NLON, the Base Master Plan would need to include a requirement that stated if the site was ever sold, upon the creation of a deed, ELUR would be recorded in accordance with the applicable federal, state, and local standards. ELUR will prohibit...</i></p>
68	Page 2-18, Paragraph 1	<p>In the first sentence, change "CTDEP" to "EPA."</p>
69	Page 2-18, Section 2.4.1	<p>Response—Comment noted. The text has been modified accordingly.</p> <p>The text discusses requirements for the discharge of treated water to surface water and re-injection to ground water, but omits discussion of discharge to sewers and/or wastewater systems. This must be included.</p>
		<p>Response—The following discussion has been added at the end of the final paragraph of the subsection, Ground-Water Remediation Standards:</p> <p><i>Contaminated ground-water may also receive preliminary ex situ treatment on site and be discharged to the sanitary sewer for final treatment through the local wastewater treatment plant. In this situation, the discharge from the ground-water treatment system will need to comply with requirements of the Connecticut Pretreatment Permit Program.</i></p>
70	Page 2-18, Paragraph 5	<p>In the third sentence, change "the substantive requirements of a CTPDES permit (based upon Connecticut Water Pollution Control Regulations)" to "federal and state discharge standards."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>

Comment No.	Page/Section	Comment/Response
71	Page 2-18, Paragraph 6	<p>Insert a new first sentence and revise the old first sentence to read: "In the four zones (2, 3, 4, and 7) where characteristic hazardous waste is present the Connecticut Hazardous Waste Management Regulations set the PRGs, independent of present or future land use scenarios and their associated receptors. In the three remaining zones where characteristic hazardous waste has not been identified (1, 5, and 6), PRGs differ between...."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
72	Page 2-19, Paragraph 2	<p>Remove this entire paragraph, since ARARs cannot be waived unless the circumstance meets one of the limited waiver criteria under the NCP (or change the paragraph to discuss the NCP waiver criteria).</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
73	Page 2-19, Paragraph 3	<p>Remove this paragraph or revise. In order to invoke a waiver under the NCP, the Navy first has to identify if any ARAR would only require (without any other alternatives available) excavation of the entire site (i.e., the Connecticut Hazardous Waste Management Regulations may cite excavation as an alternative, but the risk from the site could be addressed through hot-spot excavation, capping, treatment or some other regulatory alternative).</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
74	Page 2-19, Section 2.4.3	<p>This section needs some revision since compliance with Connecticut Hazardous Waste Management Regulations in Zones 2, 3, 4, and 7 is not tied to land use scenario and media.</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
75	Page 2-29, Section 2.5	<p>This section needs some revision since compliance with Connecticut Hazardous Waste Management Regulations in Zones 2, 3, 4, and 7 is not tied to land use scenario. Only zones that don't have to be remediated under the Hazardous Waste Regulations, or those zones where hazardous waste will still have residual contamination exceeding Connecticut Remediation Regulation standards after a being remediated for the hazardous waste contamination will need to address cleanup standards for industrial vs. residential reuse.</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
76	Page 2-29, Section 2.5	<p>This section discusses the areas of attainment, and on Page 2-29 the zones and particular COCs for each zone are listed as bulleted items. There are several discrepancies between the information presented in these bullets and the information presented in Table 2-8 for ground-water COCs. Specifically: (1) on Table 2-8, Zone 4 COCs listed are lead, copper, 1,1-DCE, vinyl chloride, and TPH, but the bullet for Zone 4 on Page 2-29 lists only lead, PAH, vinyl chloride, and 1,1-DCE; (2) on Table 2-8, Zone 5 has NI (none identified), but the bullet for Zone 5 on Page 2-29 as well as Table 2-9 lists TPH as a COC; and (3) on Table 2-8, Zone 7 lists phenanthrene as the only COC, but the bullet on Page 2-29 and Table 2-9 list lead, PAH, and phenanthrene. The text in Section 2.5 and the information in Table 2-8 should be corrected to correspond as appropriate.</p> <p>Response—Comment noted. The text in Section 2.5 has been rewritten and Table 2-8 (Attachment 4) has been modified to reflect the specific areas where COCs exceeded PRGs for current industrial and future residential land use.</p>
77	Page 2-29, Bullets 2, 3, 4, and 7	<p>Add that lead levels in these zones exceeded TCLP and, therefore, the zones contain characteristic hazardous waste.</p>

Comment No.	Page/Section	Comment/Response
		<p>Response—The referenced bullets have been modified as follows:</p> <ul style="list-style-type: none"> • Zone 1—NO CHANGE • Zone 2—No COCs in shallow soil exceeded the ICDEC or PMC (Figure 2-3). TCLP lead in soil sample 13MW11 (8.6 mg/L) exceeded the regulatory level (5 mg/L) under RCRA and Connecticut Hazardous Waste Management Regulations. This sample was collected along Albacore Rd. between Buildings 31 and 20. No ground-water COCs were retained for Zone 2. • Zone 3—Lead in shallow soil in excess of PRGs has been identified primarily along Albacore and Bulhead roads (2-EXW-ALBACORE-06 and EXSW-ALBACORE-06) at the west and southwest margins of the zone (Figure 2-4). TCLP lead in soil sample SB17 (5.9 mg/L) exceeded the regulatory level under RCRA and Connecticut Hazardous Waste Management Regulations. This sample was collected inside Building 31. No ground-water COCs were retained for Zone 3. • Zone 4—Lead and PAH exceeded PRG in shallow soil at 13TB3A, WE4A, and TB1-4RI (Figure 2-6). TCLP lead in samples 13MW16 (7.4 mg/L), 13TB3A (21.3-150 mg/L), QW-1 (51.9 mg/L), and WE4A (143 mg/L) exceeded regulatory levels under RCRA and Connecticut Hazardous Waste Management Regulations. Three of the four locations in Zone 4 with RCRA characteristic wastes are in a small area along Albacore Road in the northwest corner of Zone 4. Lead in monitoring well NESO11 exceeded Surface Water Protection Criteria. TPH was detected above Ground-Water Protection Criteria in 2 site wells (13MW16 and WE1). Two VOCs (vinyl chloride and 1,1-DCE) exceeded their PRGs (volatilizations criteria) in monitoring wells NESO11 and 13MW13 (Figure 2-7). • Zone 5—NO CHANGE • Zone 6—NO CHANGE • Zone 7—Lead and PAH were identified at 3 locations (TB-7RI, 20MW6, and TB11-&RI) above PRGs. TCLP lead in samples 20MW5 (45.9 mg/L) and 20MW6 (17.4 mg/L) exceeded regulatory levels under RCRA and Connecticut Hazardous Waste Management Regulations. These locations were along Amberjack Road south of the former incinerator. Phenanthrene exceeded Surface Water Protection Criteria in monitoring well MW2-7RI (Figures 2-10 and 2-11).
78	Chapter 2 Figures	<p>A number of figures in this section (e.g., Figures 2-6 and 2-10) adopt the symbol "AS" for arsenic. Please revise to the standard chemical symbol, "As," for ease of interpretation and consistency.</p> <p>Response—Comment noted. The figures have been modified accordingly.</p>
79	Chapter 2, Table 2-9	<p>The PRG for lead in shallow soil is given as 1,000 µg/kg for Zones 3 and 4, but as 1,000,000 µg/kg for Zone 7. Please check all magnitudes shown in this table for consistent conversions from mg/kg to µg/kg.</p> <p>Response—Comment noted.</p>
80	Table 2-6	<p>Need to add a column for the Connecticut Hazardous Waste Management Regulations which set the TCLP threshold for lead at 5.0 mg/L.</p> <p>Response—Comment noted. The table has been modified accordingly.</p>
81	Table 2-8	<p>Need to include exceedances of Connecticut Hazardous Waste Management Regulation standards for TCLP (in Zones 2, 3, 4, and 7). These PRGs are independent of present or future land use.</p> <p>Response—Comment noted. The table has been modified accordingly.</p>
82	Table 2-9	<p>Need to include exceedances of Connecticut Hazardous Waste Management Regulation standards for TCLP (in zones 2, 3, 4, and 7) for lead.</p> <p>Response—Comment noted. The table has been modified accordingly.</p>
83	Page 3-3, Paragraph 1	<p>Revise the last two sentences. Monitoring will need to be retained in all zones where COCs exceeding PRGs are present in any contaminated media. It will also be necessary to monitor the Thames River and its sediments offshore of the zones to monitor the effectiveness of the remedies (if waste is being left in place).</p> <p>Response—Comment noted. The text has been modified accordingly</p>

Comment No.	Page/Section	Comment/Response
84a	Page 3-3, Paragraph 2	In the last two sentences, change "Deed restrictions" to "Land use restrictions recorded on the Base Master Plan." <i>Response</i> —Comment noted. The text has been modified accordingly.
84b		Add a last sentence: "If property interests in the Site are ever transferred land use restrictions will be recorded in the transfer instrument (including deeds and leases) according to applicable federal, state or local standards." <i>Response</i> —Comment noted. The text has been modified accordingly.
85	Page 3-3, Bullet 1	At the end of the last sentence, add "and land use restrictions are recorded on the Base Master Plan." <i>Response</i> —Comment noted. The text has been modified accordingly.
86	Page 3-3, Bullet 2	In second sentence, remove the statement that notices are not required. Signs should be installed if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition, any land use restrictions should be recorded on the Base Master Plan. <i>Response</i> —Comment noted. The text has been modified accordingly.
87	Page 3-3, Paragraph 3	In the second sentence, insert "recorded on the Base Master Plan" after "ELUR." <i>Response</i> —Comment noted. The text has been modified accordingly.
88	Page 3-4, Section 3.1.2.1	In this section, should discuss how the asphalt cover and buildings would serve as a "cap" to limit direct exposure to contaminated soils. However, the existing cover is not sufficient to satisfy hazardous waste management standards in Zones 2, 3, 4, and 7. <i>Response</i> —Comment noted. The text has been modified accordingly.
89	Page 3-5, Paragraph 2	Replace the last sentence with: "Although the use of an engineered capping system to comply with hazardous waste management standards will not be retained. The maintenance of the asphalt "cap" to prevent direct exposure to contaminated soils will be retained." <i>Response</i> —Comment noted. The text has been modified accordingly.
90	Page 3-8, Bullet 1	Change the last sentence (and everywhere else this appears in the text) from "CTDEP" to "federal and state regulators." <i>Response</i> —Comment noted. The text has been modified accordingly.
91	Page 3-10, Paragraph 1	In the last sentence, remove "(Zones 1, 3, 4, 5, and 7)." Excavation should be considered in all zones, particularly those containing characteristic hazardous waste. <i>Response</i> —Comment noted. The text has been modified accordingly.
92	Page 3-13, Bullet 2	Change the last sentence (and everywhere else this appears in the text) from "CTDEP" to "federal and state regulators." <i>Response</i> —Comment noted. The text has been modified accordingly.
93	Page 3-13, Section 3.1.4.2	The discussion of "effectiveness" for aerobic bioremediation notes that the technique is not effective for inorganics, including lead. Here, and in similar discussions of various remedial technologies, the implication is that the technology is limited in its effectiveness because it only addresses one class of site contaminants (e.g., organics), while it is ineffective against another (e.g., lead). This should not be presented as a generic argument against the effectiveness of the technology for application at the Lower Subbase site. It is unrealistic to seek a single approach to remediate sites contaminated with organics and inorganics that are widespread. <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
94	Page 3-24, Section 3.1.4.13	The bullet on "Effectiveness" states, "... larger saturated zones (i.e., approximately 50 ft to ground water)... are required..." Please check for internal consistency. It would seem that either a large unsaturated zone (depth to ground water) or a large saturated zone (saturated thickness) is required. <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
95	Page 3-33, Paragraph 2	Replace the last two sentences with: "Soils mixed with hazardous waste present below the water table may require excavation and dewatering. Therefore, this technology will be retained in the Zones where characteristic hazardous waste is present." <i>Response</i> —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
96	Page 3-36, Paragraph 3	Elsewhere in this chapter it has stated that ground-water extraction would only occur in Zone 4. In this paragraph ground-water extraction in Zone 1 is also discussed. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
97	Page 3-42, Section 3.1.6.9	The text states the higher maintenance cost of air stripping is a reason for no further consideration of this technology. However, cost is not addressed in a separate paragraph in this section. A discussion of the higher cost of air stripping in comparison with less costly but equally effective technologies must be included. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
98	Page 3-48, Paragraph 2	Insert a new second sentence: "Excavated material will have to be tested, according to applicable standards, to determine whether it qualifies to be disposed of in a permitted hazardous waste or solid waste facility." Response —Comment noted. The text has been modified accordingly.
99	Page 3-48, Section 3.1.9	This section also needs to discuss ground-water discharge/treatment from any dewatering activity either from pumping ground water out of excavations or dewatering saturated soils. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC. In the second bullet change "CTDEP" to "applicable federal and state officials." Response —Comment noted. The text has been modified accordingly.
100	Page 3-49, Bullet 2	Change "CTDEP" to "applicable federal and state officials." Response —Comment noted. The text has been modified accordingly.
101a	Table 3-1, Page 1	Under Institutional Control - Monitoring - Needs to be retained in all zones where contamination exceeding Connecticut Hazardous Waste Management or Connecticut Remediation Regulation standards is left in place. Response —Comment noted. The text has been modified accordingly.
101b		Under Institutional Control - Access/Use Restriction - Should retain posting signs in areas subject of land use restriction (as was done at DRMO). Should change the second sentence of the Description to: "Record and enforce Environmental Land Use Restrictions (ELUR) under the Base Master Plan or other base-wide land use control mechanism and commit to recording the ELUR if a deed or lease for the area is ever created." Response —Comment noted. The text has been modified accordingly.
101c		Under Containment - Capping/Single Layer Cap - Should be retained for those zones where the Navy is relying on the existing asphalt cap to prevent direct exposure to soils, exceeding Connecticut Remediation Regulation standards. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
102	Table 3-1, Page 2	Under Source Removal - Mechanical excavation - Need to retain this option in Zone 2, where characteristic hazardous waste is present. Should also consider retaining in Zone 6 if Connecticut Remediation Reg. standards are exceeded. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
103	Table 3-1, Page 3	Under <i>In Situ</i> Treatment - Natural Attenuation - Can only be retained for Zone 4 if the alternative addresses Connecticut Hazardous Waste Management standards. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
104	Table 3-1, Page 6	Under <i>Ex Situ</i> Treatment - Dewatering - Should be retained for all Zones where excavation is being considered and where it will be necessary to excavate down to saturated soil (particularly to address hazardous waste or mixed contaminated media).

Comment No.	Page/Section	Comment/Response
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
105	Table 3-1, Page 7	Under <i>Ex Situ</i> Treatment - Physical/Chemical-Carbon Adsorption - Should be retained for all zones where excavation down to saturated soil and discharge of treated ground water is being considered (particularly to address hazardous waste or mixed contaminated media). Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
106	Table 3-1, Page 8	Under Disposal - Offsite - Need to retain this option in Zone 2, where characteristic hazardous waste is present. Should also consider retaining in Zone 6 if Connecticut Remediation Reg. standards are exceeded and excavation is required. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
107	Table 3-1, Page 8	Under Disposal - Ground-Water Discharge/Surface Water - Should be retained for all zones where excavation down to saturated soil and discharge of treated ground water is being considered (particularly to address hazardous waste or mixed contaminated media). Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
108	Page 4-1, Section 4.1	Need to address Connecticut PMC exceedances for lead and arsenic. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
109	Page 4-4, Paragraph 1	Need to discuss Connecticut PMC exceedances for lead and arsenic. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
110	Page 4-5, Section 4.3.2.1	How would the alternative address Connecticut PMC exceedances for lead and arsenic? Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
111a	Page 4-7, Paragraph 2	In the second sentence, insert “posting signs on the site if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition any ELUR would be recorded on the Base Master Plan which” should be inserted after “The ELUR” and “that would alter the existing asphalt cap” should be inserted after “construction activities.” Response —Comment noted. The text has been modified accordingly.
111b		In the fourth and fifth sentences, insert “or lease” after “deed.” Response —Comment noted. The text has been modified accordingly.
112	Page 4-7, Section 4.3.2.2	How would the alternative address Connecticut PMC exceedances for lead and arsenic? Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
113	Page 4-8, Paragraph 1	Change the third and fourth sentences to: “No treatment is specified, but ELUR would address risks associated with direct exposure. The alternative does not address soil contaminants which exceed pollutant mobility criteria, nor does the alternative meet residential use standards.” Response —Comment noted. The text has been modified accordingly.
114	Page 4-8, Paragraph 2	In the first sentence, add at the end: “, but would not be effective in addressing exceedances in PMC for lead and arsenic.” Response —Comment noted. The text has been modified accordingly.
115	Page 4-8, Paragraph 5	Replace this paragraph with: “No treatment to reduce toxicity, mobility, and volume is proposed under this Alternative.” Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
116a	Page 4-11, Paragraph 4	In the second sentence, insert "posting signs on the site if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition the ELUR would be recorded on the Base Master Plan which would include" after "ELUR would include" and "that would alter the existing asphalt cap" should be inserted after "construction activities." Response —Comment noted. The text has been modified accordingly.
116b		In the fourth and fifth sentences, insert "or lease" after "deed." Response —Comment noted. The text has been modified accordingly.
117a	Page 4-11, Section 4.3.3.2	How would the alternative address Connecticut PMC exceedances for lead and arsenic? Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
117b		At the end of the second sentence, add: "through the Base Master Plan and by posting warning signs around the contaminated area." Response —Comment noted. The text has been modified accordingly.
117c		At the end of the third sentence, add: "by maintaining the existing asphalt cover over the site." Response —Comment noted. The text has been modified accordingly.
118	Page 4-12, Paragraph 4	Will this alternative meet the Connecticut Remediation Regulation PMC for lead and arsenic? If not the alternative does not satisfy ARARs. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
119	Page 4-13, Paragraph 2	In the last sentence, change "CTDEP" with "federal and state regulators." Make sure this change is made globally throughout the document. Response —Comment noted. The text has been modified accordingly.
120	Page 4-13, Paragraph 3	The first sentence should be changed to: "ELUR would be implementable since recording the restriction in the Base Master Plan can be readily accomplished and posting the area to warn base personnel about the restrictions would require few resources." Response —Comment noted. The text has been modified accordingly.
121a	Page 4-14, Paragraph 2	In the first sentence, insert "lead, arsenic," before "TPH." Response —Comment noted. The text has been modified accordingly.
121b		In the bullet, need to describe where lead and arsenic exceeds PMC and would be removed. Response —Comment noted. The text has been modified accordingly.
122	Page 4-14, Paragraph 3	In the fourth sentence, explain what the plastic liner is meant to accomplish (would not appear to meet any regulatory standard to addressing PMC issues). Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
123a	Page 4-16, Paragraph 5	In the third sentence, insert "posting signs on the site if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition, the ELUR would be recorded on the Base Master Plan which would include" after "ELUR would include" and "that would alter the existing asphalt cap" should be inserted after "construction activities." Response —Comment noted. The text has been modified accordingly.
123b		In the fifth and sixth sentences, insert "or lease" after "deed." Response —Comment noted. The text has been modified accordingly.
124	Page 4-17, Paragraph 3	In the first sentence, insert ", including recording the restrictions in the Base Master Plan and posting the site to warn Base personnel," after "ELR." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
125	Page 4-18, Paragraph 1	Need also to discuss addressing lead and arsenic above PMCs. Response —Comment noted. The text has been modified accordingly.
126	Page 4-19, Paragraph 2	In the last sentence, change "CTDEP" with "federal and state regulators." Make sure this change is made globally throughout the document. Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
127	Page 4-19, Paragraph 3	The first sentence should be changed to: ELUR would be implementable since recording the restriction in the Base Master Plan can be readily accomplished and posting the area to warn base personnel about the restrictions would require few resources.” Response —Comment noted. The text has been modified accordingly.
128	Page 4-20, Paragraph 1	Add as a new last sentence: “Chemical, location and action-specific ARARs tables for each alternative are presented in Tables 4-3 through 4-17.” Response —Comment noted. The text has been modified accordingly.
129a	Page 4-20, Paragraph 2	In the second sentence, change “similar to” to “less than” and change “but would take longer to reduce the COC concentrations” to “since it will potentially address organic COC concentrations over time, but will not reduce inorganic COCs in the soil.” Response —Comment noted. The text has been modified accordingly.
129b		Change the third sentence to: “Alternative 2 would provide limited protection to human health and the environment through institutional controls and monitoring.” Response —Comment noted. The text has been modified accordingly.
130a	Page 4-20, Paragraph 4	In the first sentence, insert “lead, arsenic,” before “PAH.” Response —Comment noted. The text has been modified accordingly.
130b		In the third sentence, replace the text in () with “(which would include warning posting signs, documenting and enforcing the ELUR under the Base Master Plan, and committing to recording the ELUR if a deed or lease for the area is ever created).” Response —Comment noted. The text has been modified accordingly.
131	Page 4-20, Paragraph 5	In the first sentence, insert “partially” before “protective.” Insert a new second sentence: “However, the treatment technology will not address inorganic COCs at the site.” Response —Comment noted. The text has been modified accordingly.
132	Page 4-20, Paragraph 7	Change the first and second sentences to “Only Alternative 4 would comply with all ARARs, particularly the requirements under the Connecticut Standard Remediation Regulations for meeting pollutant mobility standards for lead and arsenic. Alternative 1 does not address state remediation standards to site COC. Alternative 2 and 3 would address directed exposure requirements for industrial use, but not pollutant mobility. Under all four alternatives 2, 3, and 4 residential criteria would not be met, but would be addressed through ELUR.” Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
133	Page 4-21, Paragraph 2	Insert a new fourth sentence: “However, only Alternative 4 would address inorganic COCs through excavation and removal.” Response —Comment noted. The text has been modified accordingly.
134	Page 4-21, Paragraph 3	Replace the last sentence with: “Natural attenuation under Alternative would be ineffective in addressing inorganic COCs.” Response —Comment noted. The text has been modified accordingly.
135a	Page 4-21, Paragraph 5	Remove the first sentence since offsite disposal is not regarded as a reduction in toxicity, mobility and volume through treatment. In the second sentence, change “Alternative 3” to “Alternatives 3 and 4.” Remove the third and fourth sentences for the same reason as noted above for the first sentence. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
135b		In the seventh sentence, insert “direct exposure” before “risks associated.” Response —Comment noted. The text has been modified accordingly.
136	Page 4-22, Paragraph 1	In the fourth sentence, change “carefully” to “only” and after “monitored” add “, with no action taken to address elevated concentrations of inorganic COCs in soil above PRGs.” Remove the last sentence since Alternative 2 does not address inorganic PRGs. Response —Comment noted. The text has been modified accordingly.
137	Page 4-22, Paragraph 2	In the last sentence, change “COC” to “only the organic COCs.” Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
138a	Page 4-22, Section 4.4.5	In this section also address lead and arsenic, in addition to PAHs and mercury.
		<i>Response</i> —Comment noted. The text has been modified accordingly.
138b		In the third sentence, change the text after “however, Alternative 3” to: “does not address inorganic COCs which exceed PRGs.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
138c		Change the last two sentences to: “Neither Alternatives 1 or 2 achieve the PRGs for inorganic contaminants, however overtime natural attenuation could reduce the organic contaminant levels to below PRG.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
139	Table 4-2, Page 1	Under Alternative 2, Overall Protectiveness-Human Health, insert a new first sentence: “Would not meet PRGs for inorganic COCs.” In the current second sentence, insert “organic” before “COC.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
140	Table 4-2, Page 1	Under Alternative 3, Overall Protectiveness-Human Health, insert a new first sentence: “Would not meet PRGs for inorganic COCs.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
141	Table 4-2, Page 1	Under Alternative 2, Overall Protectiveness-Environment, Potential offsite receptors, insert a new second sentence: “Does not address pollutant mobility of inorganic COCs, except through monitoring.” Remove the last sentence since natural attenuation will not address inorganic COCs.
		<i>Response</i> —Comment noted. The text has been modified accordingly.
142	Table 4-2, Page 1	Under Alternative 3, Overall Protectiveness-Environment, Potential Offsite Receptors, insert a new second sentence: “Does not address pollutant mobility of inorganic COCs, except through monitoring.” In the last sentence, insert “Organic” before “COC concentrations.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
143	Table 4-2, Page 1	Under Alternatives 2 and 3, Compliance with ARARs, Chemical-Specific, change the text to “Would not comply because the alternative does not address exceedances of pollutant mobility criteria for inorganic COCs.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
144	Table 4-2, Page 1	Under Alternative 4, Compliance with ARARs, Chemical-Specific, in the first sentence, insert “lead, arsenic,” before “TPH.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
145	Table 4-2, Page 2	Under Alternative 2, Long-Term Effectiveness and Permanence, Magnitude of Residual Risk, insert a new first sentence: “Risks from inorganic COCs above PRGs not addressed except through monitoring.” In the second sentence, insert “organic” before “COC.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
146	Table 4-2, Page 2	Under Alternative 3, Long-Term Effectiveness and Permanence, Magnitude of Residual Risk, insert a new first sentence: “Risks from inorganic COCs above PRGs not addressed except through monitoring.” In the second sentence, insert “organic” before “COC.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
147	Table 4-2, Page 2	Under Alternative 1, Reduction in Toxicity..., Treatment Process Used, in the second sentence, insert “organic” before “COC.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
148	Table 4-2, Page 2	Under Alternative 2, Reduction in Toxicity..., Treatment Process Used, insert a new first sentence: “No treatment included.” In the current first sentence, insert “organic” before “COC.” Remove the third sentence.
		<i>Response</i> —Comment noted. The text has been modified accordingly.
149	Table 4-2, Page 2	Under Alternative 4, Reduction in Toxicity..., Treatment Process Used, remove the first sentence (excavation/removal not treatment).
		<i>Response</i> —Comment noted. The text has been modified accordingly.
150	Table 4-2, Page 2	Under Alternative 1, Reduction in Toxicity..., Hazardous Material Destroyed, in the second sentence, insert “organic” before “COC.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.
151	Table 4-2, Page 2	Under Alternative 2, Reduction in Toxicity..., Hazardous Material Destroyed, insert a new first sentence: “No treatment included.” In the second sentence, remove “and inorganic.”
		<i>Response</i> —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
152	Table 4-2, Page 2	Under Alternative 3, Reduction in Toxicity..., Hazardous Material Destroyed, replace the second sentence with: "No treatment of inorganic COCs included." <i>Response</i> —Comment noted. The text has been modified accordingly.
153	Table 4-2, Page 2	Under Alternative 4, Reduction in Toxicity..., Hazardous Material Destroyed, replace the first sentence with: "No treatment of inorganic COCs included." <i>Response</i> —Comment noted. The text has been modified accordingly.
154	Table 4-2, Page 2	Under Alternative 1, Reduction in Toxicity..., Type and Quantity of Residuals, in the second sentence, insert "Organic" before "COC." Add a third sentence: "Inorganic COCs would remain onsite untreated." <i>Response</i> —Comment noted. The text has been modified accordingly.
155	Table 4-2, Page 2	Under Alternative 2, Reduction in Toxicity..., Type and Quantity of Residuals, insert a new first sentence: "No treatment included." In the second sentence, change "Complete intrinsic" to "Intrinsic." <i>Response</i> —Comment noted. The text has been modified accordingly.
156	Table 4-2, Page 2	Under Alternative 3, Reduction in Toxicity..., Type and Quantity of Residuals, replace the second sentence with: "No treatment of inorganic COCs included." <i>Response</i> —Comment noted. The text has been modified accordingly.
157	Table 4-2, Page 2	Under Alternative 4, Reduction in Toxicity..., Type and Quantity of Residuals, replace the first sentence with: "No <i>Response</i> —Comment noted. The text has been modified accordingly.
158	Table 4-2, Page 2	Under Alternative 2, Reduction in Toxicity..., Degree to which treatment is irreversible - Replace the first sentence with: "No treatment included." <i>Response</i> —Comment noted. The text has been modified accordingly.
159	Table 4-2, Page 2	Under Alternative 3, Reduction in Toxicity..., Degree to which treatment is irreversible - Add a second sentence: "No treatment of inorganic COCs included." <i>Response</i> —Comment noted. The text has been modified accordingly.
160	Table 4-2, Page 2	Under Alternative 4, Reduction in Toxicity..., Degree to which treatment is irreversible - In the first sentence, change "Selective excavation and aerobic" to "Aerobic." Add a second sentence: "No treatment of inorganic COCs included." <i>Response</i> —Comment noted. The text has been modified accordingly.
161	Table 4-2, Page 2	Under Alternative 2, Reduction in Toxicity..., Statutory preference for treatment - Replace the sentence with: "Does not satisfy." <i>Response</i> —Comment noted. The text has been modified accordingly.
162	Table 4-2, Page 2	Under Alternatives 3 and 4, Reduction in Toxicity..., Statutory preference for treatment - Change to "Partially satisfies for organic COCs." <i>Response</i> —Comment noted. The text has been modified accordingly.
163	Page 5-1	Chapter 5 does not discuss the presence of lead exceeding TCLP which make the lead RCRA characteristic waste. Since RCRA characteristic waste and media contaminated with RCRA characteristic waste is present, the Connecticut Hazardous Waste Management standards are the controlling ARAR for the site. Neither of the alternatives analyzed addresses this issue, therefore every section of this chapter needs to address the presence of hazardous waste in the Zone. <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
164	Page 5-1, Paragraph 1	Remove the third sentence since when hazardous waste is present, present or future land use is irrelevant (cleanup not driven by the Connecticut Remediation Standards which do allow different cleanups for different land uses). <i>Response</i> —Comment noted. The text has been modified accordingly.
165	Page 5-1, Paragraph 2	Replace the last sentence with: "Lead levels, which exceed TCLP, are present in Zone 2 which qualifies the contamination as hazardous waste. TPH above PRG were also identified in deep soil in Zone 2." <i>Response</i> —Comment noted. The text has been modified accordingly.
166	Page 5-1, Paragraph 3	Discuss where lead and lead-contaminated soil exceeding TCLP were located within the Zone. In the third sentence, insert "for TPH" after "concentrations." <i>Response</i> —Comment noted. The text has been modified accordingly.
167	Page 5-1, Paragraph 4	Add a third bullet that will address an alternative that is compliant with the Connecticut Hazardous Waste Management standards - possibly selective excavation/offsite disposal.

Comment No.	Page/Section	Comment/Response
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
168	Page 5-3, Paragraph 6	Change the Compliance with ARARs paragraph to: “The No Action alternative would not comply with chemical-specific ARARs because no action would be taken to address hazardous waste (lead) nor TPH concentrations exceeding Connecticut Remediation Standard regulations. Because no remedial actions are specified, location- and action-specific ARARs are not applicable to the No Action Alternative.” Response —Comment noted. The text has been modified accordingly.
169	Page 5-4, Paragraph 3	Remove the third sentence. Response —Comment noted. The text has been modified accordingly.
170	Page 5-5, Paragraph 2	Replace the first sentence with: “ELUR would not address the presence of characteristic hazardous waste in Zone 2.” Remove the third and fourth sentences since ELUR are irrelevant to addressing characteristic hazardous waste in the Zone. Response —Comment noted. The text has been modified accordingly.
171	Page 5-5, Paragraph 4	Change the first sentence to: “Alternative 2 would not be protective of human health and the environment since the presence of characteristic hazardous waste and contaminated media is not addressed.” Response —Comment noted. The text has been modified accordingly.
172	Page 5-5, Paragraph 5	Change this paragraph to: “ELUR may be partially protective of TPH PRG under a current land use scenario. However, the presence of characteristic hazardous waste requires additional action beyond ELUR.” Response —Comment noted. The text has been modified accordingly.
173	Page 5-6, Paragraph 1	Replace the paragraph with: “Alternative 2 would not comply with action-specific ARARs under the Connecticut Hazardous Waste Management standards, since it does not address characteristic hazardous waste and contaminated media present in Zone 2.” Response —Comment noted. The text has been modified accordingly.
174	Page 5-6, Paragraph 2	Replace the paragraph with: “Alternative 2 would not be effective or permanent since characteristic hazardous waste and contaminated media would not be addressed by the ELUR.” Response —Comment noted. The text has been modified accordingly.
175	Page 5-6, Paragraph 3	Replace the first sentence with: “Alternative 2 would not be effective since characteristic hazardous waste and contaminated media would not be addressed by the ELUR.” Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
176	Page 5-6, Paragraph 7	Insert a Section 5.3.3 that includes an alternative that is compliant with the Connecticut Hazardous Waste Management standards. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
177	Page 5-7, Paragraph 2	Add at least one Alternative that meets hazardous waste management standards and therefore would be protective. Change the first sentence to: “Alternative 2 would only provide limited protection of human health and the environment.” Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
178	Page 5-7, Paragraph 3	Replace the second and third sentence with: “Alternative 2 would only offer limited protection since it does not address characteristic hazardous waste and contaminated media in the Zone, but does include institution controls that would limit direct contact with TPH-contaminated soil.” Response —Comment noted. The text has been modified accordingly.
170	Page 5-7, Paragraph 4	Change this paragraph to: “Alternatives 1 and 2 do not comply with ARARs.” Then describe how an Alternative 3 (or additional alternatives) would comply. Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
180	Page 5-7, Paragraph 5	Change the second and third sentences to: "Because no remedial actions are specified under Alternative 1, location- and action-specific ARARs are not applicable to the No Action alternative." <i>Response</i> —Comment noted. The text has been modified accordingly.
181a	Page 5-7, Paragraph 6	Change the paragraph to: "Alternative 2 would comply, through ELUR, with location-specific ARARs which address remedial measures for TPH contaminated soils above PRGs. Alternative would also comply with all location-specific ARARs. However, Alternative 2 would not comply with action-specific ARARs which address the management of characteristic hazardous waste and contaminated media." <i>Response</i> —Comment noted. The text has been modified accordingly.
181b		Insert a new last paragraph: "Chemical, location, and action-specific ARARs tables for each alternative are presented in Tables 5-3 through 4-12 (Table 4-10 through 4-12 are examples of tables for a selective excavation/off-site disposal option which would comply with the Connecticut Hazardous Waste Management standards)." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
182	Page 5-7, Paragraph 7	Describe how an Alternative 3 would be effective. Change the first sentence to: "Alternative 2 would not be effective in the long-term for achieving RAO through ELUR since the remedy is insufficient to address the presence of characteristic hazardous waste and contaminated media." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
183	Page 5-7, Paragraph 10	Remove the second sentence. <i>Response</i> —Comment noted. The text has been modified accordingly.
184	Page 5-8, Section 5.4.7	There is a discrepancy in the text in the first sentence of this section which states "...highest for Alternative 1 (\$14,000)...lowest for Alternative 1,...". It appears the text should read "The capital cost are highest for Alternative 2 (\$14,000) and lowest for Alternative 1..." Please make this change to the text. This discrepancy also occurs in Section 9.4.7 on Page 9-9. <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
185	Page 5-8, Paragraph 1	Describe how an Alternative 3 would be effective in the short-term. Change the first sentence to: "Alternative 2 would provide only limited short-term effectiveness, in regards to TPH contamination, but would not be effective against contamination by characteristic hazardous waste and contaminated media. Alternative 1 would be the least effective. In the second sentence, change "Alternative 1" to "Alternatives 1 and 2." Remove the third sentence. <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
186	Page 5-8, Paragraph 3	Remove the first and second sentences. <i>Response</i> —Comment noted. The text has been modified accordingly.
187	Page 5-8, Paragraph 4	In the first sentence, change "Alternative 2" to whichever Alternative(s) are described which will meet hazardous waste management standards. Remove the second and third sentence. Add a fourth sentence which describes what required services are available for whichever Alternative(s) are described which will meet hazardous waste management standards. <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
188	Page 5-8, Paragraph 5	Change "both Alternatives 1 and 2" to "all Alternatives" (if that is the case depending on the additional alternative(s) described). <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
189	Table 5-1	Describe additional Alternatives which comply with hazardous waste management standards. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
190	Table 5-2, Page 1	Under Alternative 2, Overall Protectiveness-Human Health - Insert a new first sentence "Would not be protective against characteristic hazardous waste. In the second sentence, change "COC" to "TPH." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
191	Table 5-2, Page 1	Under Alternatives 1 and 2, Overall Protectiveness-Environment, Potential offsite receptors - Change the text to: "Does not address characteristic hazardous waste and contaminated media." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
192	Table 5-2, Page 1	Under Alternative 1, Compliance with ARARs, Chemical-specific - Change the text to: "Would not comply since characteristic hazardous waste and elevated COCs above Residential Direct Exposure Criteria not addressed." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
193	Table 5-2, Page 1	Under Alternative 2, Compliance with ARARs, Action-specific - Change the text to: "Would not comply since characteristic hazardous waste and contaminated media not addressed as required by Connecticut Hazardous Waste Management standards." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
194	Table 5-2, Page 1	Under Alternative 2, Long-Term Effectiveness and Permanence, Magnitude of residual risk - Add a new first sentence: "Would not be protective against characteristic hazardous waste and contaminated media." Change the second sentence to: "ELUR would provide some limited protection by address direct exposure risks to TPH." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
195	Table 5-2, Page 1	Under Alternative 2, Long-Term Effectiveness and Permanence, Adequacy and reliability of controls - Change the first sentence to: "Inadequate to address characteristic hazardous waste and contaminated media in the Zone." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
196a	Table 5-2, Page 2	Under Alternatives 1 and 2, Reduction in Toxicity... - The response to every sub category except the last (Statutory preference for treatment) for both alternatives should be: "No treatment included." Natural attenuation should not be discussed. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
196b		Under Alternative 2, Reduction in Toxicity..., Statutory preference... - Change "Satisfied" to "Does not satisfy." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
197a	Table 5-2, Page 2	Under Alternatives 1 and 2, Short-Term Effectiveness, Protection of site workers and protection of community - Under both subcategories change to: "Risks from the presence of characteristic hazardous waste are not addressed." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
197b		Under Alternative 2, Short-Term Effectiveness, Time to achieve... - Change to: "Remedial goals would not be achieved." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
198	Table 5-2, Page 3	Under Alternative 2, Implementability, Ability to monitor - Change to "Able to monitor effectiveness." (monitoring would be required for this remedy). Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
199	Table 5-2, Page 3	Under Alternatives 1 and 2, Implementability, Ability to obtain approvals... - For both alternatives change the text to: "Unlikely to receive regulatory approvals since characteristic hazardous waste to be left in place." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
200	Page 6-1	General Comment to Chapter 6 - This section does not discuss the presence of lead exceeding TCLP which make the lead RCRA characteristic waste. Since RCRA characteristic waste and media contaminated with RCRA characteristic waste is present, the Connecticut Hazardous Waste Management standards are the controlling ARAR for the site. None of the alternatives analyzed addresses this issue, therefore every section of this chapter needs to address the presence of hazardous waste in the Zone. Alternative 3 - Selective Excavation could address the hazardous waste issue if the excavation was conducted in compliance with Connecticut Hazardous Wasted Management standards. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
201	Page 6-1, Paragraph 1	Remove the third sentence since when hazardous waste is present, present or future land use is irrelevant (cleanup not driven by the Connecticut Remediation Standards which do allow different cleanups for different land uses). Response —Comment noted. The text has been modified accordingly.
202	Page 6-1, Paragraph 2	Replace the last sentence with: "Lead levels, which exceed TCLP, are present in Zone 2 which qualifies the contamination as characteristic hazardous waste." Response —Comment noted. The text has been modified accordingly.
203	Page 6-1, Paragraph 3	Revise the second sentence to discuss the presence of lead exceeding TCLP in addition to exceedances of the ICDEC and PMC. Response —Comment noted. The text has been modified accordingly.
204	Page 6-1, Paragraph 4	Need to make sure the lead levels in ground water do not exceed Connecticut Hazardous Waste Management standards codified in 40 CFR 264.92. Response —Comment noted. The text has been modified accordingly.
205a	Page 6-4, Paragraph 3	In the fifth sentence, describe lead exceedances of TCLP, which make the lead a characteristic hazardous waste. Response —Comment noted. The text has been modified accordingly.
205b		Change the sixth sentence to: "The No Action alternative does not contain any provisions to remediate characteristic hazardous waste present at the site." Response —Comment noted. The text has been modified accordingly.
206	Page 6-4, Paragraph 4	Remove the second and third sentences since natural attenuation is not an ARARs matter. Response —Comment noted. The text has been modified accordingly.
207	Page 6-5, Paragraph 1	The first two lines are repeated from the last paragraph of Page 6-4. Remove the second and third sentences since the presence of characteristic hazardous waste needs to be addressed under any use scenario. Response —Comment noted. The text has been modified accordingly.
208	Page 6-5, Paragraph 2	Remove the third sentence since natural attenuation is not Reduction of Toxicity...Through Treatment. Response —Comment noted. The text has been modified accordingly.
209	Page 6-5, Section 6.3.2	Change this title to "Alternative 2- Natural Attenuation, Tiered Monitoring and Institutional Controls." Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
210	Page 6-5, Paragraph 6	Insert "would only partially" before "address the RAO." Response —Comment noted. The text has been modified accordingly.
211	Page 6-6, Paragraph 1	Insert a new first sentence: "However, Alternative fails to address characteristic hazardous waste and contaminated media present at the site." Response —Comment noted. The text has been modified accordingly.
212	Page 6-6, Paragraph 2	Change the first two sentences to: "ELUR may limit future human contact with residual COC in soil. However, ELUR do not suitably address the presence of characteristic hazardous waste and contaminated media." Remove the third and fourth sentences since ELUR are irrelevant to addressing characteristic hazardous waste in the Zone. Response —Comment noted. The text has been modified accordingly.
213	Page 6-6, Paragraph 4	Change the first sentence to: "Alternative 2 would not be protective of human health and the environment since the presence of characteristic hazardous waste and contaminated media is not addressed." Response —Comment noted. The text has been modified accordingly.
214	Page 6-7, Paragraph 1	Replace the paragraph with: "Alternative 2 would not comply with action-specific ARARs under the Connecticut Hazardous Waste Management standards, since it does not address characteristic hazardous waste and contaminated media present in Zone 3." Response —Comment noted. The text has been modified accordingly.
215	Page 6-7, Paragraph 2	Replace the paragraph with: "Alternative 2 would not be effective or permanent since characteristic hazardous waste and contaminated media would not be addressed by the ELUR." Response —Comment noted. The text has been modified accordingly.
216	Page 6-7, Paragraph 3	Replace the first sentence with: "Alternative 2 would not be effective since characteristic hazardous waste and contaminated media would not be addressed by the ELUR." Response —Comment noted. The text has been modified accordingly.
217	Page 6-8, Section 6.3.3	Change the Title to: "Alternative 3 - Selective Excavation/Offsite Disposal, Tiered Monitoring and Institutional Controls." Response —Comment noted. The text has been modified accordingly.
218	Page 6-8, Bullet 1	Insert "characteristic hazardous waste and contaminated media and any additional" after "excavation of." Response —Comment noted. The text has been modified accordingly.
219	Page 6-8, Paragraph 3	Insert "characteristic hazardous waste and contaminated media and any additional" before "areas of soil." Response —Comment noted. The text has been modified accordingly.
220	Page 6-8, Paragraph 4	In this paragraph describe where characteristic hazardous waste and contaminated media would be excavated. Response —Comment noted. The text has been modified accordingly.
221a	Page 6-9, Paragraph 3	In the first sentence, need to discuss whether all characteristic hazardous waste and contaminated media could be excavated and if not how the remaining waste would be remediated based on the requirements of the Connecticut Hazardous Waste Management standards. If there are additional areas where lead is not at hazardous levels but still exceed industrial land use PRG, then institutional controls would be required under the Connecticut Remediation Regulations. Response —Comment noted. The text has been modified accordingly.
221b		In the third sentence, insert "posting signs on the site if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition any ELUR would be recorded on the Base Master Plan which would include" should be inserted after "ELUR would include." Response —Comment noted. The text has been modified accordingly.
221c		In the last sentence, insert "or lease" after "deed." Response —Comment noted. The text has been modified accordingly.
222	Page 6-10, Paragraph 1	In the first sentence, insert "characteristic hazardous waste and contaminated media and any additional contamination" before "above industrial land." Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
223a	Page 6-10, Paragraph 2	<p>In the first sentence, replace "risks under" with "risks from characteristic hazardous waste and from additional lead contamination which exceeds"</p> <p>In the third sentence, add at the end " , as long as characteristic hazardous waste is not left in place. If characteristic waste remains on site, then there must be compliance with the standards under the Connecticut Hazardous Waste Management regulations which require more than ELUR."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
223b		<p>In the last sentence, insert "or lease" after "deed."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
224	Page 6-10, Paragraph 4	<p>In the first sentence, add at the end: "as long as standards under the Connecticut Hazardous Waste Management Regulations are met." In the second sentence, replace "current industrial land use PRG" with "characteristic hazardous waste levels, as well as above PRGs for current industrial land use."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
225	Page 6-12, Paragraph 3	<p>Change the second sentence to: "Alternative 2 would only offer limited protection, since it does not address characteristic hazardous waste and would leave soil above industrial land use PRGs on the Site. Alternative 2 does limit human exposure to soil."</p> <p>Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.</p>
226	Page 6-12, Paragraph 4	<p>In the first sentence, insert "from the presence of characteristic hazardous waste, " before "future residents." In the last sentence, change "preventing" to "limiting" since the ELUR does not address the risks posed by hazardous waste at the site. Add a new last sentence: "Finally, "Alternatives 2 and 3 include at least yearly monitoring of any contamination left in place to determine that it is not posing a risk to the environment."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
227	Page 6-12, Paragraph 5	<p>In the last sentence, change "that would become a deed" to "that would include posting warnings to base personnel about the presence of subsurface contamination, recording and enforcing the land use restriction under the Base Master Plan, and recording the ELUR as a deed or lease."</p> <p>Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.</p>
228	Page 6-12, Paragraph 6	<p>Change the sentence to: "Alternatives 1 and 2 would not comply with ARARs. Alternative 3 will comply with ARARs."</p> <p>Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.</p>
229a	Page 6-12, Paragraph 7	<p>Change the first sentence to: "The presence of characteristic hazardous waste and contaminated media requires that standards for hazardous waste management be complied with."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
229b		<p>Change the fourth sentence to: "Alternative 2, which consists only of implementing ELUR, will not comply with chemical-specific pollutant mobility criteria or with action-specific hazardous waste management requirements."</p> <p>Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.</p>
229c		<p>Change the fifth sentence to: "Alternative 3 will comply with all chemical- and action-specific ARARs by removing lead-contaminated soil which exceeds characteristic hazardous waste and pollutant mobility criteria, and implementing ELUR to meet industrial land use requirements, which includes restrictions against residential use."</p> <p>Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.</p>

Comment No.	Page/Section	Comment/Response
230	Page 6-12, Paragraph 8	Change the paragraph to: "Because no remedial actions are specified under Alternative 1, location- and action-specific ARARs are not applicable. Alternatives 2 and 3 would be conducted in accordance with their respective location-specific ARARs (see Tables 6-3 through 6-11)."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
231	Page 6-13, Paragraph 1	Change the first sentence to: "Only Alternative 3 will be effective in the long-term for achieving RAO. Neither Alternatives 1 or 2 address site contamination by characteristic hazardous waste."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
232	Page 6-13, Paragraph 2	In the first sentence, insert "the presence of characteristic hazardous waste and contaminated media and" after "were associated with." Change the second and third sentences to: "Alternative 1 would include no action to address site risks. Alternative 2 would provide limited long-term effectiveness by instituting ELUR which would reduce the risk of human exposure to contaminated media. At the end of the fourth sentence, add: "removing the characteristic hazardous waste and waste exceeding industrial PMC. ELUR under Alternative 3 would be protective in controlling human exposure to remaining contaminated media and preventing future residential activity at the site. Monitoring of residual contamination under Alternatives 2 and 3 would help provide long-term protection of the environment."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
233	Page 6-13, Section 6.4.4	Replace the two paragraphs with: "None of the proposed alternatives provides any treatment which would result in a reduction of toxicity, mobility, and volume. Alternative 3 would result in the removal of contamination, thereby reducing on-site toxicity, mobility and volume and the contamination will be transported, untreated, to a permitted disposal facility."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
234	Page 6-13, Section 6.4.5	Rewrite the first two paragraphs to state: "Alternatives 1 and 2 are not effective in the short-term since they fail to adequately address characteristic hazardous waste on-site. Alternative 3 is the most effective in the short-term since it would achieve RAO, since the identified risks and elevated COC concentrations would be addressed."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
235	Page 6-14, Section 6.4.7	Cost estimates for Alternatives 2 and 3 should include annual monitoring.
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
236a	Table 6-2, Page 1	Under Alternative 2, Overall Protectiveness - Human Health - Add a new first sentence: "Does not provide protection against the presence of characteristic hazardous waste."
		Response —Comment noted. The text has been modified accordingly.
236b		Under Alternative 3, Overall Protectiveness - Human Health - Insert "above characteristic hazardous waste levels and" before "above current industrial."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
237a	Table 6-2, Page 1	Under Alternative 2, Overall Protectiveness - Environment - Replace the second sentence with: "Yearly monitoring will be used to assess potential offsite migration of COC."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
237b		Under Alternative 3, Overall Protectiveness - Environment - Add a new last sentence: "Any remaining contamination will be monitored to assess potential offsite migration of COC."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
238a	Table 6-2, Page 1	Under Alternative 2, ARARs, Chemical-Specific - Change the text to: "Would not comply since Alternative does not address lead levels above current industrial land use Preliminary Remediation Goals. ELUR does address remaining COCs."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
238b		Under Action-specific - Change text to: "Would not comply with hazardous waste management standards."
		Response —Comment noted. The text has been modified accordingly.
239a	Table 6-2, Page 1	Under Alternative 3, ARARs, Chemical-specific - Insert "above characteristic hazardous waste levels and "before "above current."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
239b		Under Action-specific - Change text to: "Would comply with action-specific requirements, including hazardous waste management standards."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
240a	Table 6-2, Page 2	Under Alternative 2, Long-Term Protectiveness, Magnitude of residual risk - Does not address risk from characteristic hazardous waste."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
240b		Under Adequacy and reliability of controls - Replace the first sentence with: "Passive control inadequate to address on-site hazardous waste." Add at the end of the last sentence: "except at least yearly monitoring."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
241a	Table 6-2, Page 2	Under Alternative 3, Long-Term Protectiveness, Magnitude of residual risk - In the second sentence, insert "at least yearly monitoring and" before "addressed through."
		Response —Comment noted. The text has been modified accordingly.
241b		Under Adequacy and reliability of controls - Add at the end of the last sentence: "except at least yearly monitoring."
		Response —Comment noted. The text has been modified accordingly.
242a	Table 6-2, Page 2	Under Alternatives 1, 2, and 3, every subcategory except Statutory preference for treatment: Text for each should be "No treatment included." (ELUR and excavation/off-site disposal are not treatment).
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
242b		Under Alternative 3, Statutory preference for treatment - Change text to "Does not satisfy." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
243a	Table 6-2, Page 3	Under Alternative 2, Short-term Effectiveness, Time to Achieve Remedial Goals - Change the text to "Remedial goals would not be achieved." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
243b		Under Alternative 3, Short-term Effectiveness, Time to Achieve Remedial Goals - In the third sentence, insert ", at least yearly monitoring," after "soil removal." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
244a	Table 6-2, Page 3	Under Alternative 2, Implementability, Ability to construct and operate - Add at the end of the second sentence, "and monitoring program." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
244b		Ability to monitor - Change the text to: "At least yearly monitoring would be readily implementable, the existing monitoring well network onsite can be used if needed." <i>Response</i> —Comment noted. The text has been modified accordingly.
244c		Ability to receive regulatory approval - Change text to: "Unlikely to receive regulatory approval since hazardous waste would be left on-site." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
245a	Table 6-2, Page 3	Under Alternative 2, Implementability, Ability to construct and operate - In the second sentence, insert " of hazardous waste" after "excavation." Change the last sentence to: "At least yearly monitoring will be implemented, as well as recording and enforcing the agreement in the Base Master Plan." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
245b		Ability to monitor - Change the text to: "At least yearly monitoring would be readily implementable, the existing monitoring well network onsite can be used if needed." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
246	Page 7-1	This chapter must address the presence of characteristic hazardous waste (lead) and contaminated media (see discussions for Zones 2 and 3). The comments in this chapter mirror those previously made in the preceding chapters for Zones where characteristic hazardous waste occurs. <i>Response</i> —Comment noted. The text has been modified accordingly.
247	Page 7-1, Paragraph 1	Remove the third sentence since PRGs need to be developed to meet the Connecticut Hazardous Waste Management standards. <i>Response</i> —Comment noted. The text has been modified accordingly.
248	Page 7-1, Paragraph 2	In the second sentence, the text needs to discuss meet Connecticut Hazardous Waste Management standards. <i>Response</i> —Comment noted. The text has been modified accordingly.
249	Page 7-1, Paragraph 3	The FS must show and discuss where lead exceeded TCLP levels. Compliance with the Connecticut Hazardous Waste Management standards for ground water must also be explained. <i>Response</i> —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
250a	Page 7-4, Paragraph 3	In the sixth sentence, change the sentence to "Lead has been identified as exceeding TCLP standards and qualifying as characteristic hazardous waste." Also move the sentence to the second sentence. Response —Comment noted. The text has been modified accordingly.
250b		Change the last sentence to: "Alternative does not address the presence of characteristic hazardous waste or exceedances of Connecticut Remediation standards. Therefore the No Action alternative does not contain any provisions to safeguard future conditions." Response —Comment noted. The text has been modified accordingly.
251	Page 7-4, Paragraph 4	In the first sentence, insert "characteristic hazardous waste levels and" after "reported above." Remove the second sentence. Response —Comment noted. The text has been modified accordingly.
252a	Page 7-5, Paragraph 1	In the second sentence, insert "the presence of characteristic hazardous waste and with" before "full-time employees." Response —Comment noted. The text has been modified accordingly.
252b		In the third sentence, add at the end: "or to address the presence of characteristic hazardous waste." Response —Comment noted. The text has been modified accordingly.
253	Page 7-5, Paragraph 2	Remove the third sentence since natural attenuation is not treatment. Response —Comment noted. The text has been modified accordingly.
254	Page 7-5, Paragraph 3	In the first sentence, insert "and the environment" after "human health" and add at the end "from the presence of characteristic hazardous waste or from exposure to soils exceeding direct exposure criteria." Response —Comment noted. The text has been modified accordingly.
255	Page 7-6, Section 7.3.2	Change the title to: "Monitored Natural Attenuation, Tiered Monitoring, and Institutional Controls" Response —Comment noted. The text has been modified accordingly.
256	Page 7-6, Paragraph 3	In the third sentence, remove all of the sentence after the A;" – change "in soil;" to "in soil." Natural attenuation does not address the presence of characteristic hazardous waste. Response —Comment noted. The text has been modified accordingly.
257	Page 7-6, Paragraph 4	Remove this paragraph since natural attenuation does not address the presence of characteristic hazardous waste. Response —Comment noted. The text has been modified accordingly.
258	Page 7-8, Paragraph 1	Replace the paragraph with: "Institutional controls would include posting warnings to base personnel about the presence of subsurface contamination, recording and enforcing the ELUR under the Base Master Plan, and recording the ELUR in any deed or lease in the event the property is ever transferred. ELUR would include limitations to construction activities, prevent the use of ground water, and would prevent residential redevelopment of the zone. The ELUR could prevent some direct contact with some of the site COC. However, ELUR and natural attenuation are insufficient to address the risk posed by the zone's characteristic hazardous waste." Response —Comment noted. The text has been modified accordingly.
259	Page 7-8, Paragraph 3	Replace the first three sentences with: "Alternative 2 would not be protective of human health and the environment since institutional controls along would be insufficient to address the risk posed by the presence of characteristic hazardous waste. ELUR would provided some limited protection from risks posed by COCs above residential use criteria, by limiting direct exposure and residential redevelopment." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
260	Page 7-9, Paragraph 1	Replace the paragraph with: "Alternative 2 would not comply with ARARs identified for Zone 4 (Tables 7-3 through 7-14). ELUR and natural attenuation are insufficient to satisfy action-specific ARARs under the Connecticut Hazardous Waste Management regulations. In addition, the Alternative does not address the chemical-specific Connecticut Remediation Standard Regulations for industrial land use PRG for lead. Alternative 2 would be conducted in accordance with location-specific ARARs."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
261	Page 7-9, Paragraph 2	Insert a new second paragraph: "Alternative 2 would not provide long-term effectiveness and permanence since iT would leave characteristic hazardous waste in place without sufficiently addressing the risks posed to human health and the environment."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
262	Page 7-9, Paragraph 3	Remove the third and fourth sentences.
		Response —Comment noted. The text has been modified accordingly.
263	Page 7-9, Paragraph 5	Replace this paragraph with: "Alternative 2 does not include any treatment that reduces the toxicity, mobility and volume of COCs within the Zone."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
264	Page 7-10, Paragraph 2	Change the first and second sentences to: "Alternative 2 would not address the short-term risks posed by the presence of characteristic hazardous waste within the Zone. The Alternative would provide some limited protection from direct exposure by maintaining the existing asphalt cover over the contaminated media. However, this cover is insufficient to meet protectiveness standards for hazardous waste."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
265a	Page 7-10, Section 7.3.3	In the title change "Environmental Land Use Restriction" to "Institutional Controls."
265b		Response —Comment noted. The text has been modified accordingly.
		In the first bullet insert "characteristic hazardous waste levels and" after "lead exceeding."
266a	Page 7-11, Paragraph 2	Response —Comment noted. The text has been modified accordingly.
		In the fifth sentence, insert "characteristic hazardous waste levels and" after "indicated above."
266b		Response —Comment noted. The text has been modified accordingly.
		Change the last sentence to whatever measure would be required under the Connecticut Hazardous Waste Management regulations to address residual characteristic hazardous waste left on-site.
267	Page 7-11, Paragraph 3	Need to identify the area(s) where characteristic hazardous waste was identified and what steps will be taken to excavate the waste and mixed contaminated media in compliance with hazardous waste management standards.
		Response —Comment noted. The text has been modified accordingly.
268	Page 7-12, Paragraph 5	In the first sentence, insert "organic COCs in" before "Zone 4."
		Response —Comment noted. The text has been modified accordingly.
269a	Page 7-14, Paragraph 1	In the first sentence, insert "characteristic hazardous waste levels and" after ACOC above."
		Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
269b		<p>Replace the rest of the paragraph with: "Institutional controls would include posting warnings to base personnel about the presence of subsurface contamination, recording and enforcing the ELUR under the Base Master Plan, and recording the ELUR in any deed or lease in the event the property is ever transferred. ELUR would include limitations to construction activities, prevent the use of ground water, and would prevent residential redevelopment of the zone. The ELUR could prevent some direct contact with some of the site COC. However, ELUR are sufficient to address the remaining risk posed by the site after excavation only if remaining contamination is managed according to applicable hazardous waste management standards."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
270a	Page 7-14, Paragraph 3	<p>In the first sentence, split the sentence at the "and" and change the second half of the sentence to: "COC concentrations. The Alternative would not be protective of human health and the environment for ground water since COCs exceeding PRGs for ground water would be left contaminated."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
270b		<p>Change the second sentence to: "Remaining COC in soil and ground water would not be addressed by institutional controls, which would only be protective if they met applicable hazardous waste management and soil/ground-water remediation requirements."</p> <p>Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.</p>
271	Page 7-14, Paragraph 2	<p>In the second sentence, insert "not fully" before "reduce risks." In the third sentence, insert "partially" before "addressed." In the fourth sentence, insert "partially" before "protected" and "or lease" after "deed."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
272	Page 7-15, Paragraph 2	<p>Change the paragraph to: "Alternative 3 would not comply with ARARs identified for Zone 4 (Tables 7-3 through 7-14). Although excavation would remove characteristic hazardous waste in compliance with action-specific ARARs under the Connecticut Hazardous Waste Management regulations, ground-water contamination is not sufficiently addressed. The Alternative's natural attenuation and institutional controls do not address the chemical-specific Connecticut Remediation Standard Regulations for ground-water PRG for lead. Alternative 3 would be conducted in accordance with location-specific ARARs."</p> <p>Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.</p>
273a	Page 7-15, Paragraph 3	<p>In the second sentence, insert "not" before "be effective." Remove the third sentence.</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
273b		<p>Change the sixth sentence to: "However, natural attenuation would not adequately address inorganics in ground water."</p> <p>Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.</p>
274	Page 7-15, Paragraph 4	<p>Add at the end of the first sentence: "as long as the excavation stage is able to remove all of the hazardous waste from the Zone."</p> <p>Response—Comment noted. The text has been modified accordingly.</p>
275	Page 7-15, Paragraph 5	<p>Replace the paragraph with: "Alternative 3 does not include any treatment that reduces the toxicity, mobility and volume of COCs within the Zone, although excavation and offsite disposal will remove the most of the contamination from the Zone."</p> <p>Response—Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.</p>

Comment No.	Page/Section	Comment/Response
276a	Page 7-16, Paragraph 1	In the first sentence, insert "partially" before "effective" and insert "including the characteristic hazardous waste and mixed media within the Zone," after "highest COC concentrations." <i>Response</i> —Comment noted. The text has been modified accordingly.
276b		Change the last sentence to: "Natural attenuation would not be effective for reducing residual non-organic COC concentrations, although it may be effective for reducing the risk from organic COCs over the long-term. The tiered monitoring program would be used to determine short-term risks from the residual COCs after the excavation and disposal is completed." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
277	Page 7-17, Bullet 1	Insert "characteristic hazardous waste levels for lead and" before "selective excavation of." <i>Response</i> —Comment noted. The text has been modified accordingly.
278a	Page 7-17, Paragraph 2	In the fifth sentence, insert "characteristic hazardous waste levels and" after "indicated above." <i>Response</i> —Comment noted. The text has been modified accordingly.
278b		Change the last sentence to whatever measure would be required under the Connecticut Hazardous Waste Management regulations to address residual characteristic hazardous waste left onsite. <i>Response</i> —Comment noted. The text has been modified accordingly.
279	Page 7-17, Paragraph 4	Need to identify the area(s) where characteristic hazardous waste was identified and what steps will be taken to excavate the waste and mixed contaminated media in compliance with hazardous waste management standards. <i>Response</i> —Comment noted. The text has been modified accordingly.
280	Page 7-19, Paragraph 3	In the last sentence, change "the substantive requirements of a CTPDES permit" to "applicable federal and state discharge standards." <i>Response</i> —Comment noted. The text has been modified accordingly.
281a	Page 7-20, Paragraph 5	In the first sentence, insert "characteristic hazardous waste levels or" after ACOC above. <i>Response</i> —Comment noted. The text has been modified accordingly.
281b		In the fourth sentence, replace "ELUR" with "institutional controls, including ELUR." <i>Response</i> —Comment noted. The text has been modified accordingly.
281c		Replace the fifth sentence with: "Institutional controls would include posting warnings to base personnel about the presence of subsurface contamination, recording and enforcing the ELUR under the Base Master Plan, and recording the ELUR in any deed or lease in the event the property is ever transferred. ELUR would include limitations to construction activities, prevent the use of ground water, and would prevent residential redevelopment of the zone. Institutional controls will be sufficient to address the remaining risk posed by the site after excavation only if remaining contamination is managed according to applicable hazardous waste management and soil/ground-water remediation standards." <i>Response</i> —Comment noted. The text has been modified accordingly.
281d		Remove the seventh sentence. <i>Response</i> —Comment noted. The text has been modified accordingly.
282a	Page 7-21, Paragraph 1	In the first sentence, insert "characteristic hazardous waste level and" after "concentrations above." <i>Response</i> —Comment noted. The text has been modified accordingly.
282b		In the third sentence, change "ELUR" with "Institutional controls, including ELUR." <i>Response</i> —Comment noted. The text has been modified accordingly.
283a	Page 7-21, Paragraph 3	In the second sentence, change "ELUR" with "Institutional controls, including ELUR." <i>Response</i> —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
283b		In the third sentence, insert "chemical-specific," before "location-specific." Response —Comment noted. The text has been modified accordingly.
283c		In the fourth sentence, change "the substantive requirements of a CTPDES permit" to "applicable federal and state discharge requirements." Response —Comment noted. The text has been modified accordingly.
284	Page 7-21, Paragraph 4	In the first sentence, change "ELUR" with "institutional controls, including ELUR." Response —Comment noted. The text has been modified accordingly.
285	Page 7-22, Paragraph 2	Remove the first, second, and fourth sentences. Response —Comment noted. The text has been modified accordingly.
286	Page 7-22, Paragraph 3	Insert "characteristic hazardous waste levels and" after "concentrations above." Response —Comment noted. The text has been modified accordingly.
287	Page 7-22, Paragraph 4	In the ninth sentence, change "the substantive requirements of a CTPDES permit" to "applicable federal and state discharge requirements." Response —Comment noted. The text has been modified accordingly.
288a	Page 7-23, Paragraph 4	Change the second and third sentences to: "The protectiveness of Alternative 3 is less than Alternative 4 since it does not address risk from ground water contamination." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
288b		Change the fourth sentence to "The protectiveness of Alternative 2 is significantly less than Alternatives 3 and 4, since the Alternative does not address the risks posed by the presence of characteristic hazard waste in the Zone." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
289a	Page 7-23, Paragraph 5	In the first sentence, insert "characteristic hazardous waste and" after "addressed regarding." Response —Comment noted. The text has been modified accordingly.
289b		In the third sentence, insert at the end: ", however, the existing surface cover does not meet the applicable requirements of the hazardous waste management standards." Response —Comment noted. The text has been modified accordingly.
289c		In the fourth sentence, change "it address" to "which partially address." Response —Comment noted. The text has been modified accordingly.
290	Page 7-23, Paragraph 6	Change the second sentence to: "Alternative 3 is less protective than Alternative 4 since the Alternative will no achieve PRG in ground water, particularly for inorganic contaminants." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
291	Page 7-24, Paragraph 1	In the last sentence, change "take longer than Alternatives 3 and 4 to" to "would not achieve." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
292	Page 7-24, Paragraph 3	Change the sentence to: "Alternative 4 would comply with ARARs. Alternatives 3, 2, and 1 would not comply." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
293a	Page 7-24, Paragraph 4	Change the first sentence to: "Lead was reported over characteristic hazardous waste levels." Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
293b		Remove the fourth sentence. Change the fifth sentence to: "Alternative 2 would not achieve PRG since it would leave characteristic hazardous waste in place and would not achieve PRGs, since it is limited to monitored natural attenuation."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
293c		Change the sixth sentence to: "Alternative 3 would achieve some PRGs by excavating contaminated soil, however ground water contamination is not adequately addressed in order to meet chemical-specific remediation standards."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
293d		In the eighth sentence, replace "ELUR" with "institutional controls, including ELUR."
		Response —Comment noted. The text has been modified accordingly.
294	Page 7-24, Paragraph 5	Change the paragraph to: "Alternatives 2, 3, and 4 would meet location-specific ARARs. There are no location-specific or action-specific ARARs for Alternative 1. Alternatives 3 and 4 would meet action-specific ARARs for the management of hazardous waste through excavation. However, only Alternative 4 adequately addresses potential hazardous waste contamination of ground water."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
295	Page 7-24, Paragraph 6	Change the first sentence to: "Only Alternative 4 would achieve RAO for both soil and ground water. Alternative 3 would achieve RAO for soil, but does not adequately address ground water, particularly for inorganic COCs. Alternative 2 would not be protective since it does not address characteristic hazardous waste present within the Zone."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
296a	Page 7-24, Paragraph 7	In the second sentence, insert "characteristic hazardous waste and" after "associated with."
		Response —Comment noted. The text has been modified accordingly.
296b		Change the third sentence to: "Although the existing pavement surface cover reduces the potential for exposure to subsurface soil it is not meet cover standards under hazardous waste management standards."
		Response —Comment noted. The text has been modified accordingly.
297	Page 7-25, Paragraph 1	Change the second sentence to: "Institution controls alone, as called for in Alternative 2, would not be protective against the presence of hazardous waste. Institutional controls with excavation and removal of contaminated soil, under Alternative 3, would be more protective against risks from soil, but does not address ground water risk. Only Alternative 4, which incorporates excavation and removal, ground water treatment, institutional controls and monitoring is fully protective over the long-term."
		Response —Comment noted. The text has been modified accordingly.
298	Page 7-25, Paragraph 2	Remove the paragraph.
		Response —Comment noted. The text has been modified accordingly.
299	Page 7-25, Section 7.4.4	Neither excavation/removal or natural attenuation are considered to be treatment under the NCP. Replace this entire section with: "Only Alternative 4 provides treatment of contaminated ground water. None of the alternatives would treat contaminated soil through reduction of toxicity, mobility or volume."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
300	Page 7-26, Paragraph 1	Replace the second sentence with: "Alternative 2 would not be effective in the short-term because it does not address hazardous waste or inorganic COC above PRGs within the Zone. Alternative 3 does address contaminated soil through excavation/removal, institutional controls, and monitoring, but does not adequately address ground water contamination above PRGs."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
301	Page 7-26, Paragraph 2	Change the second sentence to: "Institution controls alone, as called for in Alternative 2, would not be protective against the presence of hazardous waste. Institutional controls with excavation and removal of contaminated soil, under Alternative 3, would be more protective against risks from soil, but does not address ground water risk. Only Alternative 4, which incorporates excavation and removal, ground water treatment, institutional controls and monitoring are fully protective over the long-term."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
302	Page 7-26, Paragraph 3	In the first sentence, insert "characteristic hazardous waste levels and" after "in soil above."
		Response —Comment noted. The text has been modified accordingly.
303	Table 7-2, Page 1	Under Alternative 2, Overall Protectiveness - Human Health – Change the text to: "Would not address human health risks from characteristic hazardous waste nor from exceedances of industrial and ground water PRGs."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
304	Table 7-2, Page 1	Under Alternative 3, Overall Protectiveness - Human Health – Change the text to: "Selective excavation would remove human health risks from hazardous waste and exceedance in soil PRGs. However, the Alternative does not adequately address ground water PRGs, particularly for inorganic COCs."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
305	Table 7-2, Page 1	Under Alternative 2, Overall Protectiveness - Environment, Potential offsite receptors - Replace the last sentence with: "Does not address environmental risks from characteristic hazardous waste nor from exceedance of industrial and ground-water PRGs."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
306	Table 7-2, Page 1	Under Alternative 3, Overall Protectiveness - Environment, Potential offsite receptors - Change the text to: "Selective excavation would remove environmental risks from hazardous waste and exceedance in soil PRGs. However, the Alternative does not adequately address ground water PRGs, particularly for inorganic COCs."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
307a	Table 7-2, Page 1	Under Alternative 2, ARARs, Chemical-specific - Replace the text with: "Would not comply since contamination would be left in place."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
307b		ARARs, Action-specific - Replace the text with: "Would not comply since the Alternative does not meet hazardous waste management requirements."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
308a	Table 7-2, Page 1	Under Alternative 3, ARARs, Chemical-specific - Change the text to: Selective excavation of COC in soil will comply with remediation standards, however ground water PRG will not be met."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
308b		ARARs, Action-specific - May comply, if any residual hazardous waste left in place is managed in accordance with hazardous waste management requirements.
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
309a	Table 7-2, Page 2	Under Alternative 2, Long-Term Effectiveness, Magnitude of residual risk - Change the first sentence to: "Does not address long-term risk from characteristic hazardous waste or from exceedances of remediation standards."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
309b		Remove the third sentence.
		Response —Comment noted. The text has been modified accordingly.
309c		Under Adequacy and reliability of controls - Change text to "Not adequate to address the presence of characteristic hazardous waste or exceedances of remediation standards."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
310a	Table 7-2, Page 2	Under Alternative 3, Long-Term Effectiveness, Magnitude of residual risk - Change the text to: "Selective excavation will remove hazardous waste and exceedances of industrial remediation standards. ELUR will prevent exposure to remaining COC in the soil. Does not address risks posed by ground water, particularly by inorganic COCs, except by limiting exposure and monitoring."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
310b		Adequacy and reliability of controls - Add at the end: "In adequate to address inorganic COCs in ground water."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
311a	Table 7-2, Pages 2 and 3	Reduction in Toxicity, Mobility, and Volume - For Alternatives 1, 2, and 3 - Text for every subcategory except Statutory preference should be "No treatment included." For Alternatives 2 and 3, Statutory preference for treatment - Change to "Does not satisfy."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
311b		For Alternative 4 - In text for every subcategory except Statutory preference - Remove all references to excavation of soil, intrinsic bioremediation, and natural attenuation. The only treatment proposed is for ground water. For Statutory preference - Change text to "Satisfies the preference for treatment for ground water, but not for soil."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
312a	Table 7-2, Page 3	Under Alternative 2, Short-Term Effectiveness, Protections of site workers - Change the text to: "Does not address risks from the presence of hazardous waste." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
312b		Under Time to achieve remedial goals - Change text to: "Remedial goals would not be achieved." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
313	Table 7-2, Page 3	Under Alternative 3, Short-Term Effectiveness, Time to achieve remedial goals - Change text to: "Soil removal and implementation of institutional controls would achieve remedial goals for soil. Remedial goals for ground water would not be achieved, particularly for inorganic COCs." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
314a	Table 7-2, Page 4	Under Alternative 2, Implementability, Ability to obtain approvals – Change text to: "Unlikely to receive regulatory approval since hazardous waste and COC exceeding remediation standards would be left in place." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
314b		Under Alternative 3, Implementability, Ability to obtain approvals – Change text to: "Unlikely to receive regulatory approval since remedial goals for ground water would not be achieved, particularly for inorganic COCs." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
314c		Under Alternative 4, Implementability, Ability to obtain approvals – In the last sentence, change "CTDEP" to "federal and state regulators." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
315	Page 8-1, Section 8.1	Throughout this chapter need to address Connecticut PMC exceedances for lead. Instead of detailed comments please refer to the comments made for Chapter 4, Zone 1, except that in that zone there were PMC exceedances for lead and arsenic. <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
316	Page 8-3, Section 8.3.1.2	Also discuss exceedance of Connecticut PMC for lead. <i>Response</i> —Comment noted. The text has been modified accordingly.
317	Page 8-5, Section 8.3.2	Throughout this section need to address Connecticut PMC exceedances for lead. <i>Response</i> —Comment noted. The text has been modified accordingly.
318a	Page 8-5, Paragraph 3	In the second sentence, insert "posting signs on the site if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition any ELUR would be recorded on the Base Master Plan which" should be inserted after "the ELUR" and "that would alter the existing asphalt cap" should be inserted after "construction activities." <i>Response</i> —Comment noted. The text has been modified accordingly.
318b		In the fourth and fifth sentences insert "or lease" after "deed." <i>Response</i> —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
319	Page 8-5, Section 8.3.2.2	How would the alternative address Connecticut PMC exceedances for lead?
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
320	Page 8-6, Paragraph 3	Change the third sentence to: “No treatment is specified, but ELUR would address risks associated with direct exposure. The alternative does not address soil contaminants which exceed pollutant mobility criteria, nor does the alternative meet residential use standards.”
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
321	Page 8-6, Paragraph 4	In the first sentence, add at the end: “, but would not be effective in addressing exceedances in PMC for lead.
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
322	Page 8-6, Paragraph 5	Remove the second and third sentences.
		Response —Comment noted. The text has been modified accordingly.
323	Page 8-7, Section 8.3.3	This section needs to discuss how Connecticut PMC exceedances for lead will be addressed.
		Response —Comment noted. The text has been revised accordingly.
324a	Page 8-8, Paragraph 3	In the third sentence, insert “posting signs on the site if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition the ELUR would be recorded on the Base Master Plan which would include” after “ELUR would include” and “that would alter the existing asphalt cap” should be inserted after “construction activities.”
		Response —Comment noted. The text has been modified accordingly.
324b		In the fourth and fifth sentences insert “or lease” after “deed.”
		Response —Comment noted. The text has been modified accordingly.
325a	Page 8-8, Section 8.3.3.2	How would the alternative address Connecticut PMC exceedances for lead?
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
325b		At the end of the second sentence, add: “through the Base Master Plan and by posting warning signs around the contaminated area.
		Response —Comment noted. The text has been modified accordingly.
326	Page 8-8, Paragraph 6	In the last sentence, insert “or lease” after “deed.”
		Response —Comment noted. The text has been modified accordingly.
327	Page 8-9, Paragraph 2	Will this alternative meet the Connecticut Remediation Regulation PMC for lead? If not, the alternative does not satisfy ARARs.
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
328	Page 8-9, Paragraph 4	Replace this paragraph with: “No treatment to reduce toxicity, mobility, and volume is proposed under this Alternative.”
		Response —Comment noted. The text has been modified accordingly.
329	Page 8-10, Section 8.4	This section needs to be revised base on the comments made above regarding each alternative and whether the presence of lead exceeding Connecticut PMC is adequately addressed.
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
330	Page 8-10, Paragraph 3	Add as a new last sentence: “Chemical, location and action-specific ARARs tables for each alternative are presented in Tables 8-3 to 8-11.
		Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
331	Page 8-10, Paragraph 4	Change the first sentence to: "Alternative 3 would be most protective of human health and the environment, while Alternative 2 would only provide limited protection." <i>Response</i> —Comment noted. The text has been modified accordingly.
332a	Page 8-10, Paragraph 6	In the first sentence, insert "lead" before "TPH." <i>Response</i> —Comment noted. The text has been revised accordingly.
332b		In the third sentence, replace the text in parentheses with "(which would include warning posting signs, documenting and enforcing the ELUR under the Base Master Plan, and committing to recording the ELUR if a deed or lease for the area is ever created)." <i>Response</i> —Comment noted. The text has been revised accordingly.
333	Page 8-10, Paragraph 7	Change the first sentence to "Only Alternative 3 would comply with all ARARs, particularly the requirements under the Connecticut Standard Remediation Regulations for meeting pollutant mobility standards for lead. Alternative 1 does not address state remediation standards to site COC. Alternative 2 would address direct exposure requirements for industrial use, but not pollutant mobility. Under Alternatives 2 and 3 residential criteria would not be met, but would be addressed through ELUR." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
334	Page 8-11, Paragraph 3	Change the first sentence to: Alternative 3 would be effective in the long-term for achieving RAO, while Alternative 2 would only provide limited effectiveness for partially achieving RAO. <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
335	Page 8-11, Paragraph 4	Add at the end of the last sentence: ", but Alternative does not address lead exceeding PMC." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
336	Page 8-11, Paragraph 5	Change the sentence to: "Under Alternative 3, selective excavation would permanently remove lead and TPH above current industrial land use PRG and PMC." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
337	Page 8-11, Section 8.44	Replace this section with: "No treatment to reduce toxicity, mobility, and volume is proposed under any of the Alternatives." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
338	Page 8-12, Section 8.4.5	In this section also address lead, in addition to TPH. <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
339	Page 8-12, Paragraph 2	Change the second sentence to: "Alternative 2 provides only limited effectiveness since it address direct exposure to contaminated soil, but not PMC for lead." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
340	Page 8-12, Paragraph 3	In the third sentence, add at the end "however, the Alternative does not address lead exceeding PMC." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
341	Table 8-2, Page 1	Under Alternative 2, Overall Protectiveness-Human Health - insert a new first sentence: "Would not meet PRGs for lead." In the first sentence, insert "partially" before "addressed."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
342	Table 8-2, Page 1	Under Alternative 2, Overall Protectiveness-Environment, Potential offsite receptors - Replace the text with: "Does not address pollutant mobility of inorganic COCs, except through monitoring. However, low risks to offsite ecological receptors are present."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
343	Table 8-2, Page 1	Under Alternative 1, Compliance with ARARs, Location-specific - Change the text to "Not applicable because no actions are specified."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
344	Table 8-2, Page 1	Under Alternative 2, Compliance with ARARs, Chemical-specific - Change the text to "Would not comply because the alternative does not address exceedances of pollutant mobility criteria for inorganic COCs."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
345	Table 8-2, Page 1	Under Alternative 2, Long-Term Effectiveness and Permanence, Magnitude of residual risk - Insert a new first sentence: "Risks from inorganic COCs above PRGs not addressed except through monitoring." In the second sentence, insert "partially" before "addressed."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
346	Table 8-2, Page 1	Under Alternative 2, Long-Term Effectiveness and Permanence, Adequacy and reliability of controls - Replace the first sentence with "Would not be reliable to address exceedances in PMC."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
347	Table 8-2, Page 2	Under Alternatives 1-3, Reduction in Toxicity..., for all subcategories except Statutory preference - Replace all text with: "No treatment included."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
348	Table 8-2, Page 2	Under Alternative 3, Reduction in Toxicity..., Statutory preference - Change text to: "Does not satisfy."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
349	Table 8-2, Page 3	Under Alternative 2, Implementability, Ability to obtain approvals - Change text to: "Unlikely to receive regulatory approval because exceedances of Connecticut PMC not adequately addressed."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
350a	Page 9-5, Paragraph 5	In the second sentence, insert "posting signs on the site if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition the ELUR would be recorded on the Base Master Plan which would include" after "ELUR would include" and "that would alter the existing asphalt cap" should be inserted after "construction activities."
		Response —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
350b		In the fourth sentence, insert "or lease" after "deed." Response —Comment noted. The text has been modified accordingly.
351	Page 9-6, Paragraph 1	In the last sentence, insert "or lease" after "deed." Response —Comment noted. The text has been modified accordingly.
352	Page 9-7, Paragraph 1	Add as a new last sentence: "Chemical, location and action-specific ARARs tables for each alternative are presented in Tables 9-3 through 9-8." Response —Comment noted. The text has been modified accordingly.
353	Table 9-2, Page 2	Under Alternative 3, Reduction of Toxicity, Statutory preference – Change text to "Does not satisfy." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
354	Page 10-1	Chapter 10 does not discuss the presence of lead exceeding TCLP criteria that make the soil RCRA characteristic waste. Since RCRA characteristic waste and media contaminated with RCRA characteristic waste is present, the Connecticut Hazardous Waste Management standards are the controlling ARAR for the site. None of the alternatives analyzed addresses this issue, therefore every section of this chapter must be rewritten to address the presence of hazardous waste in the Zone. Alternative 3 - Selective Excavation could address the hazardous waste issue if the excavation was conducted in compliance with Connecticut Hazardous Waste Management standards. See also comments made for Chapter 6, Zone 3 where there was also hazardous waste present and the three alternatives presented in this chapter are also proposed. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
355	Page 10-1, Paragraph 1	Remove the third sentence since when hazardous waste is present, present or future land use is irrelevant (cleanup not driven by the Connecticut Remediation Standards which do allow different cleanups for different land uses). Response —Comment noted. The text has been modified accordingly.
356	Page 10-1, Paragraph 2	Replace the last sentence with: "Lead levels, which exceed TCLP, are present in Zone 2 which qualifies the contamination as characteristic hazardous waste." Response —Comment noted. The text has been modified accordingly.
357	Page 10-1, Paragraph 3	In this paragraph discuss the presence of lead exceeding TCLP. Need to make sure the lead levels in ground water do not exceed Connecticut Hazardous Waste Management standards codified in 40 CFR 264.92. Response —Comment noted. The text has been modified accordingly.
358a	Page 10-4, Paragraph 2	Need to address lead exceedances of TCLP, which make the lead a characteristic hazardous waste. Response —Comment noted. The text has been revised accordingly.
358b		Change the third sentence to: "The No Action alternative does not contain any provisions to remediate hazardous waste present at the Site." Response —Comment noted. The text has been modified accordingly.
359	Page 10-4, Paragraph 4	Remove the second and third sentences since natural attenuation is not an ARARs matter. Response —Comment noted. The text has been revised accordingly.
360	Page 10-4, Paragraph 5	Remove the second sentence since the presence of characteristic hazardous waste needs to be addressed under any use scenario. Response —Comment noted. The text has been revised accordingly.
361	Page 10-5, Paragraph 1	Remove the third sentence since natural attenuation is not Reduction of Toxicity...Through Treatment. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
362	Page 10-5, Section 6.3.2	Change this title to "Alternative 2- Natural Attenuation, Tiered Monitoring and Institutional Controls." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
363	Page 10-5, Paragraph 5	Insert "would only partially" before "address the RAO." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
364	Page 10-5, Paragraph 6	Insert a new first sentence: "However, Alternative fails to address characteristic hazardous waste and contaminated media present at the site." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
365	Page 10-6, Paragraph 3	In the last sentence, insert "characteristic hazardous waste levels and" before "current industrial." <i>Response</i> —Comment noted. The text has been revised accordingly.
366	Page 10-6, Paragraph 5	Change the first two sentences to: "ELUR may limit future human contact with residual COC in soil. However, ELUR do not suitable address the presence of characteristic hazardous waste and contaminated media." Remove the rest of the paragraph since ELUR are irrelevant to addressing characteristic hazardous waste in the Zone. <i>Response</i> —Comment noted. The text has been changed accordingly.
367	Page 10-7, Paragraph 1	Change the first sentence to: "Alternative 2 would not be protective of human health and the environment since the presence of characteristic hazardous waste and contaminated media is not addressed." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
368	p 10-7, Paragraph 3	Replace the first and second sentences with: "Alternative 2 would not comply with action-specific ARARs under the Connecticut Hazardous Waste Management standards, since it does not address characteristic hazardous waste and contaminated media present in Zone 7." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
369	Page 10-7, Paragraph 4	Replace the paragraph with: "Alternative 2 would not be effective or permanent since characteristic hazardous waste and contaminated media would not be addressed by the ELUR." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
370	Page 10-7, Paragraph 5	Replace the paragraph with: "Alternative 2 does not include any treatment to reduce toxicity, mobility, and volume of contaminants." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
371	Page 10-8, Paragraph 1	Replace the paragraph with: "Alternative 2 would not be effective in addressing the presence of characteristic hazardous waste within the Zone. The institutional controls would have some limited effectiveness in reducing direct exposure to contaminants." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
372	Page 10-8, Section 10.3.3	Change the Title to: "Alternative 3 - Selective Excavation/Offsite Disposal, Tiered Monitoring and Institutional Controls." <i>Response</i> —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
373	Page 10-8, Bullet 1	Insert "characteristic hazardous waste and contaminated media and any additional" after "excavation of." <i>Response</i> —Comment noted. The text has been modified accordingly.

Comment No.	Page/Section	Comment/Response
374	Page 10-8, Paragraph 2	Revise the last sentence to describe a closure procedure which will satisfy Connecticut Hazardous Waste Management requirements.
		Response —Comment noted. The text has been modified accordingly.
375	Page 10-8, Paragraph 3	In this paragraph describe where characteristic hazardous waste and contaminated media would be excavated.
		Response —Comment noted. The text has been modified accordingly.
376	Page 10-9, Paragraph 4	In the first sentence, need to discuss whether all characteristic hazardous waste and contaminated media could be excavated and if not how the remaining waste would be remediated based on the requirements of the Connecticut Hazardous Waste Management standards. If there are additional areas where lead is not at hazardous levels but still exceed industrial land use PRG, then institutional controls would be required under the Connecticut Remediation Regulations.
		Response —Comment noted. The text has been modified accordingly.
377a	Page 10-10, Paragraph 5	In the third sentence, insert “posting signs on the site if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition any ELUR would be recorded on the Base Master Plan which would include” should be inserted after “ELUR would include.”
		Response —Comment noted. The text has been modified accordingly.
377b		In the last sentence, insert “or lease” after “deed.”
		Response —Comment noted. The text has been modified accordingly.
378	Page 10-11, Paragraph 2	In the first sentence, insert “characteristic hazardous waste and contaminated media and any additional contamination” before “above industrial land.”
		Response —Comment noted. The text has been modified accordingly.
379a	Page 10-11, Paragraph 3	In the first sentence, insert “include posting signs on the site if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition any ELUR would be recorded on the Base Master Plan and” should be inserted after “ELUR would.” Also in the first sentence, insert “residual” before ACOC.” and add at the end A, as long as characteristic hazardous waste is not left in place. If characteristic waste remains on site, then there must be compliance with the standards under the Connecticut Hazardous Waste Management regulations which require more than ELUR.”
		Response —Comment noted. The text has been modified accordingly.
379b		In the fourth sentence, insert “or lease” after “deed.”
		Response —Comment noted. The text has been modified accordingly.
380	Page 10-11, Paragraph 5	In the first sentence, add at the end: “as long as standards under the Connecticut Hazardous Waste Management Regulations are met.”
		Response —Comment noted. The text has been modified accordingly.
381	Page 10-12, Paragraph 1	In the second sentence, insert “characteristic hazardous waste levels and” after “soil exceeding.”
		Response —Comment noted. The text has been modified accordingly.
382	Page 10-12, Paragraph 2	Replace the paragraph with: “Alternative 3 does not include any treatment to reduce toxicity, mobility, and volume of contaminants.”
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
383	Page 10-12, Paragraph 3	In the second sentence, insert “characteristic hazardous waste levels and” after “exceeding.”
		Response —Comment noted. The text has been modified accordingly.
384	Page 10-13, Paragraph 3	Add as a new last sentence: “Chemical, location and action-specific ARARs tables for each alternative are presented in Tables 10-3 to 10-11.”
		Response —Comment noted. The text has been modified accordingly.
385	Page 10-13, Paragraph 4	Change the second sentence, to: “Alternative 2 would only offer limited protection, since it does not address characteristic hazardous waste and would leave soil above industrial land use PRGs on the Site. Alternative 2 does limit human exposure to soil.”
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
386	Page 10-13, Paragraph 5	In the first sentence, insert "from the presence of characteristic hazardous waste, " before "full-time employees." In the sixth sentence, change "preventing" to "limiting" since the ELUR does not address the risks posed by hazardous waste at the site. Response —Comment noted. The text has been modified accordingly.
387	Page 10-14, Paragraph 1	Change the sentence to: "Alternatives 1 and 2 would not comply with ARARs, since the presence of hazardous waste is not addressed. Alternative 3 will comply with ARARs." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
388a	Page 10-14, Paragraph 2	Change the first sentence to: "The presence of characteristic hazardous waste and contaminated requires that standards for hazardous waste management be complied with." Response —Comment noted. The text has been modified accordingly.
388b		Change the fourth sentence to: "Alternative 2, which consists only of implementing ELUR, will not comply with chemical-specific pollutant mobility criteria or with action-specific hazardous waste management requirements." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
388c		Change the fifth sentence to: "Alternative 3 will comply with all chemical- and action-specific ARARs by removing lead-contaminated soil that exceed characteristic hazardous waste and pollutant mobility criteria, and implementing ELUR to meet industrial land use requirements, which includes restrictions against residential use." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
389	Page 10-14, Paragraph 3	Change the paragraph to: "Because no remedial actions are specified under Alternative 1, location- and action-specific ARARs are not applicable. Alternatives 2 and 3 would be conducted in accordance with their respective location-specific ARARs (see Tables 10-3 through 10-11)." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
390	Page 10-14, Paragraph 4	Change the first sentence to: "Only Alternative 3 will be effective in the long-term for achieving RAO. Neither Alternatives 1 or 2 address site contamination by characteristic hazardous waste." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
391a	Page 6-13, Paragraph 2	Change the second sentence to: "Alternative 1 would include no action to address site risks. Alternative 2 would provide limited long-term effectiveness by instituting ELUR which would reduce the risk of human exposure to contaminated media." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
391b		Change the second sentence: "Selective excavation with offsite disposal under Alternative 3 would remove the characteristic hazardous waste and waste exceeding industrial PRG. ELUR under Alternative 3 would be protective in controlling human exposure to remaining contaminated media and preventing future residential activity at the site." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
392	Page 10-14, Section 10.4.4	Change the section to: "None of the Alternatives includes treatment which will reduce toxicity, mobility, and volume of contaminants."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
393	Page 10-15, Section 10.4.5	Rewrite the first two paragraphs to state: "Alternatives 1 and 2 are not effective in the short-term since they fail to adequately address characteristic hazardous waste on-site. Alternative 3 is the most effective in the short-term since it would achieve RAO, since the identified risks and elevated COC concentrations would be addressed."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
394a	Table 10-2, Page 1	Under Alternative 2, Overall Protectiveness – Human Health - Add a new first sentence: "Does not provide protection against the presence of characteristic hazardous waste."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
394b		Under Alternative 3, Overall Protectiveness – Human Health - Insert "above characteristic hazardous waste levels and" before "above current industrial."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
395a	Table 10-2, Page 1	Under Alternative 2, ARARs, Chemical-specific - Change the text to: "Would not comply since Alternative does not address lead levels above current industrial land use Preliminary Remediation Goals."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
395b		Under Action-specific - Change text to: "Would not comply with hazardous waste management standards."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
396a	Table 10-2, Page 1	Under Alternative 3, ARARs, Chemical-specific - Insert "above characteristic hazardous waste levels and" before "above current."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
396b		Under Action-specific - Change text to: "Would comply with action-specific requirements, including hazardous waste management standards."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
397a	Table 10-2, Page 2	Under Alternative 2, Long-Term Protectiveness, Magnitude of residual risk - Replace the text with: "Does not address risk from characteristic hazardous waste."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
397b		Under Adequacy and reliability of controls - Replace the first sentence with: "Passive control is inadequate to address on-site hazardous waste." Add at the end of the last sentence: "except for at least yearly monitoring."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
398a	Table 10-2, Page 2	Under Alternative 3, Long-Term Protectiveness, Magnitude of residual risk - In the second sentence, insert "at least yearly monitoring and" before "addressed through."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
398b		Under Adequacy and reliability of controls - Add at the end of the last sentence: "except at least yearly monitoring."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
399a	Table 10-2, Page 2	Under Alternatives 1, 2, and 3, every subcategory except Statutory preference for treatment: Text for each should be "No treatment included." ELUR and excavation/offsite disposal are not considered treatment under the NCP.
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
399b		Under Alternative 3, Statutory preference for treatment - Change text to "Does not satisfy."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
400a	Table 10-2, Page 3	Under Alternative 2, Short-term Effectiveness, Time to Achieve Remedial Goals - Change the text to "Remedial goals would not be achieved."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
400b		Under Alternative 3, Short-term Effectiveness, Time to Achieve Remedial Goals - In the third sentence, insert "; at least yearly monitoring," after "soil removal."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
401a	Table 10-2, Page 3	Under Alternative 2, Implementability, Ability to monitor - Change the text to: "At least yearly monitoring would be readily implementable, the existing monitoring well network onsite can be used."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
401b		Ability to receive regulatory approval - Change text to: "Unlikely to receive regulatory approval since hazardous waste would be left on-site."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
402a	Table 6-2, Page 3	Under Alternative 3, Implementability, Ability to construct and operate - In the second sentence, insert " of hazardous waste" after "excavation." Change the last two sentences with: "At least yearly monitoring will be implemented, as well as recording and enforcing the agreement in the Base Master Plan."
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
402b		Ability to monitor - Change the text to: "At least yearly monitoring would be readily implementable, the existing monitoring well network onsite can be used."
		Response —Comment noted. The text has been modified accordingly.
403	Page 11-1, Section 11.1	For Zone 2 need to add an alternative for Selective Excavation/Offsite Disposal, Tiered Monitoring and Institutional Controls. For all of the Zones, use the titles used in the EPA ARARs tables provided and in the comments above.
		Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.

Comment No.	Page/Section	Comment/Response
404a	Page 11-2, Section 11.22	In the first paragraph, in the first sentence, insert "residual" before ACOC." and add at the end A, as long as characteristic hazardous waste is not left in place. If characteristic waste remains on site, then there must be compliance with the standards under the Connecticut Hazardous Waste Management regulations which require more than ELUR. Response —Comment noted. The text has been modified accordingly.
404b		In the third sentence, insert "include posting signs on the site if waste is left in place which poses a risk to base personnel using the site (i.e., notices not to dig through the pavement). In addition any ELUR would be recorded on the Base Master Plan and" should be inserted after "ELUR would." Response —Comment noted. The text has been modified accordingly.
404c		In the fifth sentence, insert "or lease" after "deed." Response —Comment noted. The text has been modified accordingly.
405	Page 11-3, Section 11.2.3	This section needs to be revised based on the above comments. All zones where contamination is left in place require monitoring. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
406	Page 11-3, Section 11.2.4	This section needs to be revised based on the above comments. Natural attenuation is only potentially applicable to organic COCs. In zones with characteristic hazardous waste and inorganic COCs, natural attenuation is not adequate for achieve PRGs. Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
407	Page 11-4, Section 11.2.5	This section needs to be revised based on the above comments. In the first paragraph, second sentence, there needs to be inserted "characteristic hazardous waste levels and" before "COC exceeding." Response —Comment noted. Chapters 3 through 10 have been revised to better evaluate the applicability of remedial technologies for each zone, media, and COC.
408	References	The December 1989 Risk Assessment Guidance, Part A (RAGS A) should be included in the reference list along with the August 1997 Exposure Factors Handbook. Response —Comment noted. The references have been added accordingly.
409	Appendix B, Table B-1	The toxicity values used in the risk and PRG calculations are presented in this table. However, the source of each toxicity value is not indicated. Source information should be included in this table. Response —Comment noted. The table has been modified accordingly.
410	Appendix B, Table B-2	The adult resident exposure duration values for dermal and ingestion exposure routes are listed as 24 (RME) and 7 (CTE) years. Should the values be 30 (RME) and 9 (CTE) years? If so, please correct the table. Response —The comment refers to a section, which has been significantly modified based upon EPA, CTDEP, and Navy input. The revisions have satisfied the content of this comment.
411	Appendix B, Table B-2, Inhalation Rates	The inhalation rates seem to be generally overestimated for the full-time employee and construction worker. In addition, the references listed for the inhalation rates are confusing. EPA's Exposure Factor Handbook, Volume I, Table 5-23 (August 1997) should be consulted for inhalation rates. The reference listed as "(e)" is superceded by RAGs Part A, which was issued in December 1989; this reference includes a recommendation of 20 M ³ /day for a residential adult. However, values listed in Table 5-23 of the Exposure Factor Handbook are recommended for use in the contaminant intake calculations. Response —The comment refers to a section, which has been significantly modified based upon EPA, CTDEP, and Navy input. The revisions have satisfied the content of this comment.

Comment No.	Page/Section	Comment/Response
412	Appendix B, Table B-2, Footnote (b)	How can "age-adjusted ingestion and dermal contact rates" be applied for the adult resident? Please correct or clarify the text.
		Response —The comment refers to a section, which has been significantly modified based upon EPA, CTDEP, and Navy input. The revisions have satisfied the content of this comment.
413	Appendix B, Table B-3	The table should include footnotes regarding the derivation of the information presented (e.g., UCLs, number of analyses, etc.). The table appears to include the combined shallow and deep soil information presented in Appendix D. Please also reference the source of the data.
		Response —Comment noted. The table has been modified accordingly.
414	Appendix B, Page B-3	The methods used in the calculation of the PRG values are presented on this page. At the bottom of Page B-3, the text erroneously states that the desired risk level for non-carcinogens is 10^{-6} and that the desired risk level for carcinogens is 1. The text should be corrected to read a desired Cancer Risk of 10^{-6} and a desired Hazard Quotient of 1.0.
		Response —The comment refers to a section, which has been significantly modified based upon EPA, CTDEP, and Navy input. The revisions have satisfied the content of this comment.
415	Appendix B, Table B-2	The exposure parameters for all exposure scenarios are displayed in Table B-2. The PM10 Exposure Factors that are shown for inhalation of dust are given as 1.8E-8 for both the Full-Time Employee and the Resident, and 9E-8 for the Construction Worker. Upon review, however, it was noticed that the air concentrations values were derived using a PM10 factor of 1.8E-6. Therefore, the table should be corrected.
		Response —The comment refers to a section, which has been significantly modified based upon EPA, CTDEP, and Navy input. The revisions have satisfied the content of this comment.
416	Appendix B, Table B-2	The exposure parameters for all exposure scenarios are displayed in Table B-2. However, the ABS values for each COC are not presented. The ABS values to be used in the dermal calculations must be presented.
		Response —The comment refers to a section, which has been significantly modified based upon EPA, CTDEP, and Navy input. The revisions have satisfied the content of this comment.
417	Appendix B, Table B-3	The chemical dibenzo(a,h)anthracene is incorrectly spelled "dibenzo(a,h)anthracent" in the table.
		Response —Comment noted. The table has been modified accordingly.

**RESPONSE TO COMMENTS FROM THE
BUREAU OF WATER MANAGEMENT
PERMITTING, ENFORCEMENT, AND REMEDIATION DIVISION
FEDERAL REMEDIATION PROGRAM
ON THE DRAFT FEASIBILITY STUDY FOR
SOIL AND GROUND WATER AT THE LOWER SUBBASE
NAVAL SUBMARINE BASE NEW LONDON, GROTON, CONNECTICUT**

COMMENTOR: Mark R. Lewis
Senior Environmental Analyst

DATE: 29 November 1999

The Department has received and reviewed the Draft *Feasibility Study for Soil and Ground Water at the Lower Subbase, Naval Submarine Base New London, Groton, Connecticut*. The document was prepared on behalf of the Navy by EA Engineering, Science, and Technology of Newburgh, New York. The report was dated July 1999 and the Department received this document on 26 July 1999.

GENERAL COMMENTS

1. **Comment**—The State is disappointed that the Feasibility Study (FS) does not adequately consider the requirements of the Remediation Standard Regulations (RSRs), particularly the requirements regarding pollutant mobility. The study does not list all of the contaminants present at concentrations greater than the RSR criteria in every zone. The Pollutant Mobility Criteria apply to all soils above the seasonal high water table. Total petroleum hydrocarbon (TPH), lead, and other contaminants are present in numerous locations at concentrations greater than the Pollutant Mobility Criteria. However, the Navy does not propose alternatives for Zones 2 and 6 that would address the Pollutant Mobility Criteria.

Response—Comment noted. Significant revisions to this document have occurred taking into account both general and specific comments from CTDEP and the EPA.

2. **Comment**—The FS eliminates from consideration in any zone several technologies that might be useful for addressing some of the contaminants on the Lower Base. In addition, the Feasibility Study does not appear to consistently evaluate specific technologies in each of the seven zones. Technologies are retained in some zones and eliminated in other zones, for no apparent reason, or for inappropriate reasons.

For example, the Navy eliminates capping from further consideration in any of the zones. This decision is based on concerns over the large amount of buildings and pavement in the Lower Base, and on statements that capping would not comply with applicable or relevant and appropriate requirements (ARARs). However, the report discusses only an “engineered cap,” and does not consider other, less elaborate caps. An asphalt pavement cap could be used to render soil inaccessible and comply with the Direct Exposure Criteria. A cap that meets the RSR definition of “engineered control” could be used in selected areas to comply with both the direct exposure and pollutant mobility requirements.

Monitored natural attenuation is inappropriately eliminated from consideration in Zones 2, 3, 5, 6, and 7 despite the fact that organic contaminants are present in each of these zones.

Selective excavation is eliminated from consideration in Zones 2 and 6 despite the fact that selective excavation might be useful in addressing some or all of the contaminants in these zones. Some technologies are eliminated because they cannot address all types of contaminants in a given zone. This decision should be reconsidered given the diversity of contaminants present in the Lower Base. It is unlikely that any single technology, other than an engineered control, will address all contaminants present at a given site. It is more likely that several different technologies will be required to deal with all the contaminants at a given site.

Response—Comment noted. Chapter 3 has been revised to be more general in screening the technologies. The revised Table 3-1 will carry forward a significant number of previously discarded technologies. Chapters 4 through 10 will include a matrix figure which will have the full list of technologies carried forward on one axis, and the 9 National Contingency Plan (NCP) criteria on the other. This chart will summarize each technology's effectiveness in complying with each of the 9 NCP criteria. The result is a more defined and clearer mechanism for developing remedial alternatives that incorporates a potentially wider assortment of technologies.

3. **Comment**—The report uses the current industrial and future residential land use scenarios as an overall framework for discussion. This approach is confusing because these scenarios were only meant for use in risk assessment. The reader is left with the mistaken impression that the RSRs may be applied differently depending upon which of the two scenarios is being considered. This confusion is compounded by the fact that the Regulations include Residential and Direct Exposure Criteria, as well as Pollutant Mobility Criteria. These requirements are different from, and have nothing to do with, risk assessment scenarios. The RSRs apply regardless of which risk assessment scenario is being discussed.

Response—Comment noted. The two scenarios are for use with risk assessment as well as for review and comparison to the RSRs. The RSRs have two criteria for different land uses, and it is prudent to evaluate cleanup standards from both positions. The facility at this time will remain as an industrial land use, therefore requiring review of the industrial exposure criteria. However, it is prudent for the Navy to examine the potential of cleanup to the more stringent residential criteria. The discussions within the text have been significantly modified to better explain the evaluation of industrial and residential land use scenarios as they pertain to comparing constituents of concern (COCs) against the RSRs, and to explain the use of these scenarios in back calculating risk-based preliminary remediation goals (PRGs).

SPECIFIC COMMENTS

Specific comments and responses are provided below:

Comment No.	Section/Page	Comment
1	Page 1-1, Chapter 1, Introduction	Please delete the last sentence in the second paragraph. This report is not required by the Remediation Standard Regulations and does not by itself satisfy the requirements of those Regulations
		Response —Comment noted. The text will be changed as requested.
2	Page 1-1, Section 1.1, Purpose	The last sentence states the Navy, EPA, and the State will select the remedy. Please revise to state that the Navy selects the remedy, and seek EPA's and the State's concurrence.
		Response —Comment noted. The text will be changed as requested.
3	Page 1-6, Section 1.2.4, Zone 3	Please re-write the third sentence in the second paragraph to clarify the fact that batteries, rather than submarines, were serviced in Building 31. This building is located on dry land.
		Response —Comment noted. The text will be changed as requested.
4	Page 1-9, Section 1.2.6, Zone 5	Please indicate in the text whether the Tanks in Building 175 were used to store fresh or waste battery acid. Please specify when the tanks and associated piping were removed. Please specify that the 1,000-gal tank discussed in the third paragraph was used to store fuel oil.
		Response —The information contained in Chapter 1 is a duplication of the information available in the RI. The RI will be reviewed to determine if additional information is available. If additional information is available, the section will be modified accordingly.
5	Page 1-11, Section 1.2.9, Fuel Oil Distribution System	Please clarify that the tank farm was located in the southern section of the Upper Base, near the baseball fields.
		Response —The information contained in Chapter 1 is a duplication of the information available in the RI. The RI will be reviewed to determine if additional information is available. If additional information is available, the section will be modified accordingly.
6	Page 1-12, Section 1.2.10, Steam, Condensate and Electrical Ducts	What happens to the unrecovered steam condensate that goes to the piers? Is this discharge covered in any of the Navy's state or NPDES water discharge permits? Please specify this information in the report.
		Response —The information contained in Chapter 1 is a duplication of the information available in the RI. The RI will be reviewed to determine if additional information is available. If additional information is available, the section will be modified accordingly.
7	Page 1-16, Section 1.3.3.2, Surface Water Quality and Designation	In the first sentence of the second paragraph, "U.S. Geologic Survey" should be "U.S. Geological Survey."
		Response —Comment noted. The text will be changed as requested.
8	Page 1-22, Section 1.3.8.2, Ground-Water Quality, CTDEP Ground-Water Classifications	In the second sentence, please delete "and the ground water is not used as a drinking water source," and replace it with "and where public water supply service is available." The State does not prohibit the use of ground water as a drinking water source in a GB area. The Water Quality Standards specify that public water service must be available throughout an area with a ground-water classification of GB.
		Response —Comment noted. The text will be changed as requested.

Comment No.	Section/Page	Comment
9	Pages 1-26 to 1-31, Section 1.4, Nature and Extent of Constituents of Concern	<p>This section discusses the distribution of contaminants in soil and ground water in each of the seven zones. The report gives the general locations where contaminants were found in high concentrations, such as "southwest of building 174, just south of a catch basin." The report does not always list the specific wells or test borings where the corresponding samples were collected. In some cases, the wells and test borings that are discussed are not depicted on the corresponding figures (Figures 1-4 to 1-10 and Figures 2-1 to 2-11). Please revise the text to identify the specific wells or borings upon which conclusions are based. It may also be useful to outline upon the maps the boundaries of areas where soil or ground-water contamination was detected at concentrations in excess of applicable criteria.</p> <p>Response—Comment noted. The text will be changed as requested.</p>
10	Page 1-43, Section 1.7.2, Ecological Risk Assessment Summary - Zone 2	<p>The last paragraph states that "only limited interpretation" of data from macroinvertebrate sampling "can be conducted due to temporal fluctuations." Please provide more information regarding the specific nature of the temporal fluctuations. Was the concentration of contaminants observed in macroinvertebrates fluctuating, or was some other parameter fluctuating? This comment applies also to the subsequent discussions regarding Zone 3 (Page 1-44), and Zone 5 (Page 1-46).</p> <p>Response—The information contained in Chapter 1 is a duplication of the information available in the RI. The RI will be reviewed to determine if additional information is available. If additional information is available, the section will be modified accordingly.</p>
11	Page 1-48, Section 1.7.7, Ecological Risk Assessment Summary - Zone 7	<p>The last paragraph states that sediment at Piers 15 and 17 was replaced with clean fill after dredging. This statement does not appear to be correct since the dredging was done to accommodate the Seawolf submarines. It is unlikely that the Navy would dredge sediment from the berthing areas and replace it with clean fill. Please clarify.</p> <p>Response—The information contained in Chapter 1 is a duplication of the information available in the RI. The RI will be reviewed to determine if additional information is available. If additional information is available, the section will be modified accordingly.</p>
12	Figure 1-7, Zone 4 Boundaries	<p>Well WE-1 is discussed on Page 1-29 but is not shown on this figure. Please correct.</p> <p>Response—Comment noted. The text will be changed as requested.</p>
13	Figure 1-10, Zone 7 Boundaries	<p>Please show on this figure the location of the transformers at Building 157 Vault 31.</p> <p>Response—The information contained in this figure is a duplication of the information available in the RI. The RI will be reviewed to determine if additional information is available. If additional information is available, the figure will be modified accordingly.</p>
14	Table 1-1, Background Concentrations of Thames River Surface Water	<p>This table provides non-site-specific, literature-based background values for inorganic substances in surface water. While this information is useful, if the Navy intends to apply background concentrations for making decisions regarding remediation of the ground-water plume, then the Navy must develop site-specific background concentrations in the ground-water plume.</p> <p>Response—Comment noted. The Navy will evaluate the value of this information.</p>
15	Page 2-1, Section 2.2, Applicable or Relevant and Appropriate Requirements	<p>In the last sentence, please add that a selected action must also comply with more stringent state regulations.</p> <p>Response—Comment noted. The text currently indicates that the selected action will comply with federal and state regulations. The text will remain unchanged.</p>
16	Page 2-4, Section 2.2.5.1, Chemical Specific Applicable or Relevant and Appropriate Requirements	<p>Human Health Risk Calculations for Soil and Sediment are not a statute or regulation, and should not be listed as an ARAR. They should, however, be included on the list of To Be Considered Guidance. Please provide citations for each of the statutes and regulations cited.</p> <p>Response—Comment noted. The text will be changed as requested.</p>

Comment No.	Section/Page	Comment
17	Page 2-5, Section 2.2.5.1, Chemical Specific Applicable or Relevant and Appropriate Requirements—Federal Safe Drinking Water Act	<p>The second paragraph discusses the State's EPA endorsed Comprehensive Ground-Water Protection Program. It states that because ground water at the Subase is classified as GB, which is the equivalent of national Contingency Plan Class III, the aquifer has a low use and value. This conclusion directly contradicts the EPA Region draft 1996 Guidance on Ground-Water Use and Value Determinations, which is also cited in the text. The 1996 Guidance states on Page 2 that EPA "will no longer rely on" ground-water classifications "in setting goals for ground-water remediation and in making decisions on the level of cleanup necessary." EPA has not requested, and the State has not prepared, a site-specific Ground-Water Use and Value Determination for the Subase. It would be inappropriate to draw any conclusion regarding the use and value of ground water at the Subase. The State agrees, however, that MCLs are not an ARAR at this site.</p> <p>Response—Comment noted. The text will be modified so as not to draw conclusions regarding the use and value of the ground water at the site.</p>
18a	Page 2-6, Section 2.2.5.1, Chemical Specific Applicable or Relevant and Appropriate Requirements—CTDEP Remediation Standards for Soil and Ground Water	<p>The first full paragraph paraphrases Section 22a-133k-2(e)(1)(A) of the Remediation Standard Regulations, but does not discuss Section (e)(1)(B). Please discuss Section (e)(1)(B), which states that compliance with a Direct Exposure Criteria is achieved when the results of all laboratory analyses of samples from the release area are less than or equal to the applicable direct exposure criterion.</p> <p>Response—Comment noted. The text will be reviewed and modified accordingly, if appropriate.</p>
18b		<p>The third sentence in the second full paragraph is confusing. It should be re-written to more clearly state that for inorganic and PCBs, compliance with the Pollutant Mobility Criteria is based on the results of leachate analysis by TCLP or SPLP. This section discusses the circumstances under which compliance with the Pollutant Mobility Criteria may (but is not required to) be evaluated. This is accomplished by comparing the results of TCLP or SPLP analysis to the Ground-Water Protection Criteria multiplied by 10, or by an alternative dilution or dilution and attenuation factor. The specific circumstances are discussed in Section 22a-133k-2(c)(2) of the Regulations.</p> <p>Response—Comment noted. The text will be reviewed and modified accordingly, if appropriate.</p>
18c		<p>The third full paragraph should more completely describe the requirements of Section 22a-122k-2(e)(2) of the Regulations regarding methods for determining compliance with the Pollutant Mobility Criteria. The text only discusses Subsection A. It does not state this section applies only if the release area has not been remediated by means of excavation and removal of polluted soil. The text should use the full term "95 percent upper confidence level of the arithmetic mean." The text should also discuss Subsection B, which applies when the site has not been remediated by excavation, and when less than 20 soil samples have been collected. It should also discuss Subsection C, which applies when the site has been remediated by excavation.</p> <p>Response—Comment noted. The text will be reviewed and modified accordingly, if appropriate.</p>
18d		<p>The last sentence of the last paragraph should more completely discuss the requirements for determining compliance with the Surface Water Protection Criteria, as specified in Section 22a-133k-3(f)(2) of the Regulations. In addition to regulatory option (A) discussed in the text, compliance with the Surface Water Protection Criteria may also be achieved when the concentration of the substance in the portion of the plume immediately upgradient of the point at which the ground-water discharges to the receiving surface waterbody is equal to or less than the applicable surface-water protection criterion, provided that the areal extent of the plume is not increasing over time and that, except for seasonal variations, the concentration of the substance in the plume is not increasing, except as a result of natural attenuation, at any point over time (Option B).</p>

Comment No.	Section/Page	Comment
		<i>Response</i> —Comment noted. The text will be reviewed and modified accordingly, if appropriate.
18e		<p>This paragraph incorrectly states that the volatilization criteria apply to ground water which discharges to a surface waterbody. Section 22a-133k-3(c)(1) specifies that the volatilization criteria apply to ground water polluted with a volatile organic substance within 15 feet of the ground surface or a building. The volatilization criteria do not necessarily apply to all ground water which discharges to surface water. Please correct the text.</p> <p><i>Response</i>—Comment noted. The text will be reviewed and modified accordingly, if appropriate.</p>
19	Page 2-7, Section 2.2.5.1, Chemical Specific Applicable or Relevant and Appropriate Requirements—CTDEP Remediation Standards for Soil and Ground Water	<p>The first paragraph discusses options for determining compliance with the volatilization criteria, as specified in Section 22a-133k-3(f)(3) of the Regulations. The text discusses only one of the two options (Option A) available for determining compliance. Option B should be discussed also. In the last sentence, please specify that the 95 percent UCL is the 95 percent UCL of the arithmetic mean.</p> <p><i>Response</i>—Comment noted. The text will be reviewed and modified accordingly, if appropriate.</p>
20a	Page 2-9, Section 2.2.5.3, Action Specific Applicable or Relevant and Appropriate Requirements	<p>The Connecticut Hazardous Waste Management Regulations (RCSA Section 22a-449(c)100 to 110) should be listed as relevant and appropriate. These regulations would be applicable to any investigation-derived waste. The Water Discharge Permitting Regulations (RCSA Section 22a-430-1 to 8, should be listed as applicable. The Air Pollution Control Regulations (RCSA Section 22a-174-1 to 29), the Regulations for the Well Drilling Industry (RCSA Section 25-128-33 to 64) and the Registration and Permitting Requirements for Wells and Well Drillers (CGS Section 25-126 to 25-131 should be listed as Applicable. The Guidelines for Soil Erosion and Sediment Control, which were adopted as required by CGS Section 22a-328, should be listed as Applicable. In the fourth bullet point, the “Connecticut Pollutant Discharge Elimination System is more properly referred to as the Connecticut Water Discharge Permitting Program. The applicable statutes and regulations include RCSA Section 22a-430-1 to 8 (discussed above) and CGS Section 22a-430 (discussed in the text). The reference to Section 22a-436 of the General Statutes, should be deleted because that section is not an applicable requirement.</p> <p><i>Response</i>—Comment noted. The text will be reviewed and modified accordingly, if appropriate.</p>
20b		<p>The last bullet should refer to the Connecticut Water Quality Standards.</p> <p><i>Response</i>—Comment noted. The text will be changed as requested.</p>
21a	Page 2-11, Section 2.2.5.3, Action Specific Applicable or Relevant and Appropriate Requirements—Connecticut Pollutant Discharge Elimination System	<p>Please change the title of this section to “Connecticut Water Discharge Permitting Program.” As described in the previous comment, CGS Section 22a-430 and RCSA Section 22a-430-1 to 8 are the applicable requirements for this program. The program includes NPDES permits, which regulate discharges to surface water, and State discharge permits, which regulate discharges to a municipal sewer system.</p> <p><i>Response</i>—Comment noted. The text will be changed as requested.</p>
21b	Connecticut Water Quality Standards	<p>The last sentence states that a permit for re-injection of treated ground water would set concentration limits that are protective of Class GA ground water. Please note that the ground-water classification of the Subase is GB. The GA classification applies only to a very small undeveloped area at the northern- most portion of the base.</p> <p><i>Response</i>—Comment noted. The text will be modified accordingly.</p>

Comment No.	Section/Page	Comment
22	Page 2-12, Section 2.2.5.3, Action Specific Applicable or Relevant and Appropriate Requirements—Connecticut Air Pollution Control Act	<p>In the first sentence, please replace “Connecticut General Regulations” with “Connecticut General Statutes.”</p> <p>Response—Comment noted. The text will be changed as requested.</p>
23	Page 2-14, Section 2.3.3.3, Connecticut Department of Environmental Protection Remediation Standards Constituents of Concern	<p>The second paragraph states that the Surface Water Protection Criteria were developed by multiplying the Ambient Water Quality Criteria by a factor of 10. This statement should be revised to reflect the fact that the dilution factor applied in calculating the surface water criteria varied depending on the type of pollutant. The 10x dilution factor was not used for all pollutants.</p> <p>The text states that a site-specific dilution factor of 118 was calculated for the Surface Water Protection Criteria. This dilution factor does not appear to have been calculated in accordance with Section 22a-133k-3(b) (3) of the Remediation Standard Regulations which discusses alternative Surface Water Protection Criteria.</p> <p>Response—Comment noted. The calculations have been checked, modified where appropriate, and the text formatted to explain how the calculations were derived.</p>
24	Page 2-15, Section 2.4.1, Development of Preliminary Remedial Goals	<p>The first paragraph states incorrectly that definitive cleanup criteria will be developed after selection of a remedial alternative in the signed Record of Decision. The text should be revised to state that cleanup criteria are listed in the Proposed Plan, and included in the Record of Decision. The clean up criteria are set when the Record of Decision is signed.</p> <p>Response—Comment noted. The text will be changed as requested.</p>
25a	Page 2-17, Section 2.4.1, Development of Preliminary Remedial Goals—Direct Exposure Criteria	<p>The second paragraph paraphrases Section 22a-133k-2(e)(1), which discusses two methods for determining compliance with the Direct Exposure Criteria. The text only discusses option A. It should also discuss option B.</p> <p>Response—Comment noted. The text will be changed as requested.</p>
25b		<p>The third paragraph notes that the Direct Exposure Criteria do not apply to inaccessible soil. The text should also specify that this exception applies only if an environmental land use restriction (or the Navy equivalent) is in place. The environmental land use restriction must ensure that the soils will not be exposed as a result of excavation, demolition, or other activities, and that pavement which is necessary to render the soil inaccessible is maintained in good condition.</p> <p>Response—Comment noted. The text will be changed as requested.</p>
25c	Pollutant Mobility Criteria	<p>The first paragraph discusses methods for determining compliance with the Pollutant Mobility Criteria, as specified in Section 22a-133k-2(e)(2) of the Regulations. The text should specify that the methods discussed apply only if the soil has not been remediated by excavation and removal. The text should discuss option C, which applies if the soil has been remediated by excavation and removal. In this case, the results of all soil samples must be equal to or less than the Pollutant Mobility Criteria.</p> <p>Response—Comment noted. The text will be changed as requested.</p>

Comment No.	Section/Page	Comment
25d		<p>The second paragraph discusses a site-specific dilution factor, which was based on flow rates in the Thames River. This is not appropriate, as the Pollutant Mobility Criteria are designed to be protective of ground water, rather than surface water. The site-specific dilution factor calculated for the Pollutant Mobility Criteria is different from the site-specific dilution factor that would be calculated for the Surface Water Protection Criteria. Please propose an appropriately calculated site-specific or alternative dilution factor. The calculated factor should be based on ground-water flow rates and aquifer characteristics, rather than on flow rates or other properties of the Thames. In the last sentence of this paragraph, I believe the author meant to refer to Sections 22a-133k-2(d)(5)(D)(5 to 6), rather than to Section 22a-133k-2(c)(5)(D)(5 to 6).</p> <p>Response—Comment noted. The calculations have been checked, modified where appropriate, and the text formatted to explain how the calculations were derived.</p>
26a	Page 2-18, Section 2.4.1, Development of Preliminary Remedial Goals—Ground-Water Remediation Standards	<p>The third paragraph states that the Surface Water Protection Criteria were developed by multiplying the Ambient Water Quality Criteria by a factor of 10. This statement should be revised to reflect the fact that the dilution factor applied in calculating the surface water criteria varied depending on the type of pollutant. The 10x dilution factor was not used for all pollutants.</p> <p>Response—Comment noted. The calculations have been checked, modified where appropriate, and the text formatted to explain how the calculations were derived.</p>
26b		<p>The 118x dilution factor discussed here does not appear to have been calculated in accordance with the requirements of Section 22a-133k-3(b)(3). It is unlikely that this dilution factor would be the same as the alternative dilution factor calculated for determining compliance with the Pollutant Mobility Criteria. The 118x dilution factor is not appropriate for use in proposing an alternative Surface Water Protection Criteria.</p> <p>Response—Comment noted. The calculations have been checked, modified where appropriate, and the text formatted to explain how the calculations were derived.</p>
27a	Page 2-19, Section 2.4.2, Accommodations of Preliminary Remediation Goals and ARARs	<p>The second paragraph should be revised to note that a selected remedy must comply with all ARARs unless a specific waiver is invoked. In addition, it is possible to design a cap that would comply with all ARARs, particularly the Remediation Standard Regulations requirements regarding the use of an engineered control to contain contaminated soil.</p> <p>Response—Comment noted. The text will be changed as requested.</p>
27b		<p>The third paragraph should be revised or deleted. Total excavation would undoubtedly pose a greater risk to subsurface utilities than other alternatives. However, this does not mean that total excavation would also pose a greater danger to the environment than other alternatives.</p> <p>Response—Comment noted. The text will be changed as requested.</p>
28	Page 2-19, Section 2.4.3, Comparison of Analytical Data to Preliminary Remediation Goals	<p>Please note that the criteria in the Remediation Standard Regulations apply regardless of the current or future land use.</p> <p>Response—Comment noted.</p>
29	Page 2-21, Section 2.4.3.1.3, Zone 3—Ground Water	<p>The text states that the mean concentration of total lead, 134 $\mu\text{g/L}$, is less than the surface water protection criterion. The surface water protection criterion for lead is 13 $\mu\text{g/L}$. Please correct this statement.</p> <p>Response—Comment noted. The text will be changed as requested.</p>
30	Page 2-22, Section 2.4.3.1.5, Zone 5—Shallow Soil	<p>The report states that matrix interference resulted in dilution of three samples analyzed for PAHs. This caused high detection limits for these samples, which in turn caused an artificially high 95% UCL mean value for PAH. If the Navy wishes to assert that matrix interference effects prevented the laboratory from achieving detection limits lower than the Pollutant Mobility Criteria, then the Navy must present the information required under Section 22a-133k-2(e)(3) of the Regulations.</p> <p>Response—Comment noted.</p>

Comment No.	Section/Page	Comment
31	Page 2-22, Section 2.4.3.1.6, Zone 6—Shallow Soil	The text states that although the TPH concentration slightly exceeded the industrial commercial direct exposure criterion, TPH was not chosen as a COC because no TPH exceeded twice the criterion. It is not appropriate to exclude a contaminant as a COC on this basis.
		<i>Response</i> —Comment noted. The text will be changed to better explain why TPH was not selected as a COC.
32	Page 2-26, Section 2.4.3.2.4, Zone 3	Lead was detected in 95 out of 96 ground-water samples collected outside the remediation area for Building 31. Did the lead concentrations exceed the HHRA based PRGs?
		<i>Response</i> —Comment noted. The text will be modified accordingly to address this issue.
33	Page 2-24, Section 2.4.3.2, Future Residential Land Use Scenario	Information regarding the Pollutant Mobility Criteria was presented in the previous section, which discusses the current industrial land use risk assessment scenario. This information is therefore not repeated in this section. However, information regarding the Direct Exposure Criteria is repeated in this section. This is confusing, and implies that the Direct Exposure Criteria were treated differently for the two risk assessment scenarios. The direct exposure, pollutant mobility, and ground-water criteria apply regardless of the risk assessment scenario being used. It is somewhat misleading to discuss compliance with the Remediation Standard Regulations under the Current Industrial Land Use scenario or the Future Residential land use scenario. It would be more appropriate to discuss compliance with the Remediation Standard Regulations in a separate section.
		<i>Response</i> —Comment noted. The text will be modified to appropriately discuss compliance with the RSRs.
34a	Page 2-29, Section 2.5, Areas of Attainment	The text states that environmental land use restrictions “will prohibit further residential land use of the area without further actions to actions to achieve compliance with residential PRG.” This sentence should be revised since environmental land use restrictions, by themselves, do not achieve compliance with the Remediation Standard Regulations. Environmental land use restrictions are used to assure that other measures, such as engineered controls remain effective. They may also be used to ensure that contaminated soil is not disturbed, or to ensure that contaminated ground water is not used as a source of drinking water.
		<i>Response</i> —Comment noted. The text will be changed accordingly.
34b		This section only discusses areas where PRGs are exceeded under the current industrial land use scenario. Areas where PRGs are exceeded under the future residential land use scenario should also be discussed here.
		<i>Response</i> —Comment noted. The text will be changed accordingly.
35	Page 2-30, Section 2.6, Remedial Action Objectives	This section presents remedial action objectives for the current industrial land use scenario, but does not present any remedial action objectives for the future residential land use scenario. Remedial action objectives should be presented for both land use scenarios. An additional remedial action objective for both scenarios should be: “Prevent human and environmental exposure to contaminants at concentrations which exceed applicable criteria in the remediation standard regulations.
		<i>Response</i> —Comment noted. The text will be reviewed and, if appropriate, additional Remedial Action Objectives will be included.
36a	Table 2-1, Summary of Chemical Specific ARARs	In the Status column, a particular requirement can only be an ARAR or a TBC. It cannot be both.
		<i>Response</i> —Comment noted. The text will be changed accordingly.

Comment No.	Section/Page	Comment
36b		<p>The first citation under the Remediation Standard Regulations should be to Section 22a-133k-3 of the Regulations. The synopsis of the ground water related Remediation Standard Regulations must be revised. These regulations do not establish beneficial uses for water, nor do they establish an anti-degradation policy. These objectives are accomplished by the Water Quality Standards, which were adopted under Section 22a-426 of the General Statutes. The volatilization criteria do not establish criteria for volatilization from ground water. They apply to ground water, not to pollutants which volatilize from ground water. The volatilization criteria for soil vapor (Appendix F of the Regulations) do not apply unless a volatilization criterion for ground water (Appendix E of the Regulations) is exceeded.</p> <p>Response—Comment noted.</p>
36c		<p>The discussion regarding the soil related portions of the Remediation Standard Regulations must be revised. PRGs are developed only for soil above a depth of 2 ft in paved areas, and above 4 ft in unpaved areas. The Direct Exposure Criteria apply to all soils above a depth of 15 ft, and PRGs should be developed for all such soils.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
36d		<p>Citations should be provided for all listed laws and regulations, including the Connecticut Coastal Management Act, the Federal and State Endangered Species Acts, and the National Historic Preservation Acts. The Federal and State Endangered Species Acts are Applicable requirements.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
37a	Table 2-3, Summary of Action Specific ARARs—State Discharge Requirements	<p>Please replace “Connecticut Pollutant Discharge Elimination System” with “Connecticut water Discharge Permitting Statutes.” These statutes prohibit discharges to the waters of the State without a permit. Please also add a section for “Connecticut Water Discharge Permitting Regulations,” which should be cited as RCSA Section 22a-430-1 to 8.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
37b		<p>Under the Remediation Standard Regulations, the row that begins with “To Be Considered” should be eliminated. This row discusses the applicability of drinking water standards at the Subbase.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
37c		<p>Please specify that the Water Quality Standards were adopted under CGS Section 22a-426.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
37d		<p>Please add the Connecticut Hazardous Waste Management Regulations (RCSA Section 22a-449(c)-100 to 110.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
37e		<p>Please provide a citation for the State’s Air Pollution Control Regulations.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
37f		<p>Please include the Regulations for the Well Drilling Industry (RCSA Section 25-128-33 to 64) and the statutes regarding Registration and Permitting of Wells and Well Drillers (CGS Section 25-126 to 131) as Applicable Requirements.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
37g		<p>Please list the State’s Guidelines for Soil Erosion and Sediment Control, which were adopted pursuant to CGS Section 22a-328, as Applicable requirements.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
38	Table 2-6, Preliminary Remedial Goals for Soil	<p>Please indicate in the table which criteria are from the appendices in the Remediation Standard Regulations and which were proposed by the Navy and approved by the Commissioner in accordance with the regulations. This comment applies also to Table 2-7 (Preliminary Remedial Goals for Ground Water).</p> <p>Response—Comment noted. The text will be changed accordingly.</p>

Comment No.	Section/Page	Comment
39a	Table 2-8, Summary of Constituents of Concern Exceeding Preliminary Remedial Goals by Land Use, Matrix, and Zone at Lower Subase	<p>This table includes lists exceedances of the Pollutant Mobility Criteria and Surface Water Protection Criteria under the current industrial land use scenario, but not under the future residential land use scenario. The table does not indicate that the volatilization criteria were considered. All three criteria are applicable regardless of the land use scenario being considered. The various land use scenarios were considered for risk assessment purposes. It is appropriate to include as contaminants of concern pollutants that exceed acceptable concentrations calculated under one of these scenarios. However, it is misleading to say that a particular pollutant exceeded Remediation Standard Regulation criteria under a given risk assessment scenario. Please revise the table to ensure that it considers all criteria in the Remediation Standard Regulations, including the direct exposure, pollutant mobility, surface water protection, and volatilization criteria. The table should have a separate section, which lists for each zone and media the pollutants that exceed the criteria specified in the Regulations.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
39b		<p>The footnotes state that for some pollutants, the 95% UCL of the arithmetic mean exceeded the criteria. However, these pollutants were not retained as a COC because the maximum concentration was less than twice the criteria. This is not an appropriate method for selecting contaminants of concern. Any pollutant detected at a concentration exceeding risk assessment based or ARAR based criteria must be retained as a contaminant of concern.</p> <p>Response—Comment noted. The footnote will be modified accordingly.</p>
40a	Table 2-9, Summary of Constituents of Concern Addressed by the Remedial Alternatives	<p>This table includes Pollutant Mobility Criteria, which were calculated by applying a site-specific dilution factor as specified in Subsection 22a-133k-2(c)(2)(E)(i) of the Regulations. This subsection E(ii) of the Regulations specifies the formula that must be used in calculating a site-specific dilution factor. This formula is based on Darcy's Law, and it considers the hydraulic conductivity, hydraulic gradient, and other aquifer characteristics. The 118x dilution factor used by the Navy was calculated by considering the water flow in the Thames River. In addition, the Navy did not provide the information or submit the notice required under the Regulations. This factor was not calculated in accordance with the regulations and should not be used in calculating site-specific Pollutant Mobility Criteria. The same dilution factor may not be applicable at each of the seven zones because the dilution calculation considers the length of the release area.</p> <p>Response—Comment noted. Seven specific dilution factors will be calculated for each zone, where appropriate. Notification, as required under the regulation for department approval from the Commissioner's office was not made pending preliminary approval from CTDEP approval. As noted, CTDEP determined that the method used was not appropriate and requires revision. Official notification will be withheld until CTDEP is satisfied with the calculation and use of the site-specific dilution factors.</p>
40b		<p>The Regulations specify that for a GB area, the results of a <i>mass analysis</i> (for organics) <i>may be compared to the GA Pollutant Mobility Criteria</i> multiplied by the site-specific dilution factor. The results of a <i>TCLP or SPLP analysis</i> (for inorganic and PCBs) <i>may be compared to the Ground-Water Protection Criteria</i> multiplied by the site-specific dilution factor. The Pollutant Mobility Criteria presented for lead appears to have been calculated by multiplying the GB Pollutant Mobility Criteria, rather than the Ground-Water Protection Criteria, by the 118x dilution factor. This is not acceptable under the Regulations because in effect, it applies two dilution factors in calculating the Pollutant Mobility Criteria.</p> <p>Response—Comment noted. The calculations will be reviewed and modified appropriately.</p>

Comment No.	Section/Page	Comment
40c		<p>Please replace the numbers in the "ARAR PRG-PMC" column with either the Pollutant Mobility Criteria specified in Appendix B of the Regulations or proposed by the Navy and approved by the Commissioner. Alternatively, the Navy may calculate site-specific dilution factors as specified in Section 22a-133k-2(c)(2)(E)(ii) of the Regulations. Please compare the properly calculated Pollutant Mobility Criteria to the sampling data for each of the seven zones. It is likely that additional contaminants of concern will be identified when this is done.</p> <p>Response—Comment noted.</p>
40d		<p>Please specify in the Upper Confidence Limit Concentration column that this is the 95% UCL of the arithmetic mean. Please specify in the "ARAR PRG" column that this column lists the Pollutant Mobility Criteria. This table should list all of the Remediation Standard Regulation criteria, for both soil and ground water.</p> <p>Response—Comment noted.</p>
41	Page 3-1, Section 3.1, Identification and Screening of Technologies	<p>The term "COC" is often used generically in place of "contaminants." The term "COC" has a very specific meaning within the context of CERCLA. It should only be used when discussing the specific contaminants of concern at this site. When discussing contaminants in a generic sense, as in this section, the term "contaminants" should be used instead.</p> <p>Response—Comment noted.</p>
42	Page 3-2, Section 3.1, Identification and Screening of Technology Types and Process Options—Implementability	<p>The report does not properly consider the "potential for obtaining regulatory approval" in the case of the "No Action" alternative. In several cases, the report states that the "No Action" alternative would not achieve remedial objectives and therefore would be unlikely to obtain regulatory approval. The "potential for obtaining regulatory approval" is meant to evaluate whether permits or other regulatory requirements can be met for a particular option. It is not meant to evaluate whether regulatory agencies are likely to accept or reject a particular remedial option.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
43	Page 3-2, Section 3.1.1.1, Monitoring	<p>Please revise the text to state that another purpose of monitoring is to verify the effectiveness of the selected remedial option. Please also state that monitoring may involve collection of ground water or surface water level data. Under Section 22a-133k-3(g)(3) of the Regulations, continued monitoring will be required in any zone where contamination will remain.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
44a	Page 3-3, Section 3.1.1.2, Site Use Restrictions	<p>Although the acronym "ELUR" may have been defined in a previous chapter, it would be helpful to define it again here. Please note that the term "environmental land use restriction" means a land use restriction as described in Section 22a-133q-1 of the Regulations. An environmental land use restriction has four parts: (1) a declaration of environmental land use restriction approved either by the Commissioner or by a Licensed Environmental Professional, (2) a class A-2 survey, (3) a certificate of title demonstrating that the required subordination agreement has been recorded, and (4) a copy of the decision document. This is different from the term "ELUR" as used by the Navy in this report. The Navy appears to use the term more generically, to describe land use controls of any sort. It would be more appropriate to avoid the use of the term "ELUR," except when describing an environmental land use restriction as defined in the Regulations. Environmental land use restrictions run with the land and remain in effect unless released by the Commissioner.</p> <p>Response—Comment noted. The use of ELUR will be modified according to the definitions provided. In generic cases, the term "institutional controls" will replace "ELUR." For consistency through the document, all acronyms are defined only at their first usage.</p>

Comment No.	Section/Page	Comment
44b		<p>The Navy states that "ELUR are readily" implementable, and notes that a deed restriction could be implemented if property use changes in the future. As long as the property remains under the control of the Navy, it is unlikely that the Navy could record an environmental land use restriction. Other types of institutional controls, such as signs, and amendments to the base master plan, would be used instead. We have discussed informally on several recent occasions what measures can be used on the base in lieu of formal environmental land use restrictions. I would like to meet with the Navy as well as EPA to discuss more specifically how institutional controls can be implemented at the Lower Base site, as well as at other sites on the base. If the base is closed, then the State would require that formal environmental land restrictions be recorded where necessary.</p> <p>Response—Comment noted.</p>
45	Page 3-3, Section 3.1.1.3, Point-of-Entry/ Point of Use Treatment, and Page 3-4, Section 3.1.1.4, Alternative Water Supply	<p>These sections should be deleted since ground water is not used as a source of drinking water on the lower base.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
46	Page 3-5, Section 3.1.2.1, Capping	<p>There are other types of barriers in addition to an "engineered cap." The type of barrier selected would depend on the nature of the contaminants, and upon the requirement driving the use of the cap. A soil or asphalt cap might be sufficient to render soil inaccessible and comply with the Remediation Standard Regulation requirements regarding Direct Exposure Criteria. A more elaborate, multi-layer cap might be necessary to comply with the requirements for use of an engineered control, or with the requirements of RCRA subtitle C. It is inappropriate to dismiss the use of capping on the basis that asphalt or soil caps "would not comply with the ARAR." It is also inappropriate to make this conclusion based on the fact that much of the base is paved or covered by buildings. The presence of asphalt or cement does not present an insurmountable engineering challenge that would prevent the installation of a cap in certain parts of the base.</p> <p>Response—Comment noted. Chapter 3 has been modified significantly to ensure that potentially relevant technologies are properly considered for use at the Lower Subbase sites.</p>
47	Pages 3-5 to 3-6, Section 3.1.2.3, Physical Barriers	<p>Please delete the first sentence of the second bullet point. The installation of vertical barriers might be feasible in limited areas, such as at the edge of the Thames.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
48a	Page 3-7, Section 3.1.2.4, Hydraulic Controls-Extraction Wells	<p>The first bullet point states that extraction wells could be designed to work in conjunction with the eastward flow of ground water. Please add a discussion of the fact that during half of every tidal cycle, the direction of ground-water flow is reversed in the portion of the site immediately adjacent to the river.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>
48b		<p>In the second bullet point, it is unclear why the installation of extraction wells would have to be "coordinated with CTDEP." Is the Navy referring to the State's Water Diversion Regulations? It is not clear why the report concludes, in the last paragraph, that ground-water extraction is not warranted in Zones 1 to 3 and 5 to 7. Ground-water extraction should be retained as an alternative for each of the seven zones.</p> <p>Response—Comment noted. The text will be changed accordingly. Placement of any potential extraction wells will be "coordinated with CTDEP" to ensure that CTDEP concurs with placement of the wells.</p>
49	Page 3-9, Section 3.1.3.1, Soil Excavation	<p>Soil excavation should be retained as an alternative for all seven zones since contaminants in excess of the Remediation Standard Regulation criteria and other ARARs were detected in all zones.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>

Comment No.	Section/Page	Comment
50	Page 3-10, Section 3.1.3.2, Ground-Water Extraction	Please state more clearly the distinction between ground-water extraction as discussed here, and extraction wells as discussed on Page 3-7. Does the discussion in this section refer to ground-water extraction for the purposes of actively remediating an aquifer?
		Response —Comment noted. The text will be changed accordingly.
51	Page 3-11, Section 3.1.3.3, Light, Non-Aqueous Phase Liquid	Please include a contingency for recovery of LNAPL, should it be encountered in the future.
		Response —The RI indicated that no LNAPL has been identified at the site. No consideration in the design will be given to contaminants or conditions that were not identified in the RI.
52	Page 3-12, Section 3.1.4.1, Monitored Natural Attenuation	Organic contaminants were detected in soils in all seven zones at concentrations exceeding cleanup criteria. It is therefore unclear why monitored natural attenuation was not retained for all zones.
		Response —Comment noted. Chapter 3 has been modified significantly to ensure that potentially relevant technologies are properly considered for use at the Lower Subbase sites.
53	Page 3-13, Section 3.1.4.2, Aerobic Bioremediation	It is not appropriate to eliminate this technology from consideration simply because it would be ineffective against inorganics. Aerobic bioremediation could be used to treat organic contaminants as one component of a treatment train of several technologies.
		Response —Comment noted. Chapter 3 has been modified significantly to ensure that potentially relevant technologies are properly considered for use at the Lower Subbase sites.
54	Page 3-22, Section 3.1.4.10, Chemical Fixation/Solidification	Chemical fixation/solidification is eliminated from consideration “due to the extensive subsurface utility network and because the long- term effectiveness is uncertain.” This is inappropriate since this process has already been used by the Navy to remediate lead contaminated soil at Building 31 in Zone 3.
		Response —Comment noted. Chapter 3 has been modified significantly to ensure that potentially relevant technologies are properly considered for use at the Lower Subbase sites
55a	Page 3- 24, Section 3.1.4.13, Vacuum Vapor Extraction	The explanation of this technology is somewhat confusing. Please define a “pinhole plate.” Please clarify that ground-water pumping is caused by the reduced air pressure in the top of the well, rather than by air bubbles. The bubbles serve to strip volatile contaminants from the dissolved phase to the gaseous phase.
		Response —Comment noted. The text will be modified to further clarify these issues.
55b		In the first bullet point regarding effectiveness, please clarify the statement regarding “... larger saturated zones (i.e., approximately 50 ft to ground water...)” The text should refer here to larger unsaturated zones. A large saturated zone is unlikely to be found in an area with a depth of 50 ft to ground water.
		Response —Comment noted. The text will be changed accordingly.
56	Page 3-30, Section 3.1.5.5 (Ex Situ) Chemical Fixation/ Solidification	This technology is eliminated due to the potential for damage to subsurface utilities. This is an <i>ex situ</i> technology which would be used to treat soil removed by excavation or other means. It is therefore unclear why this technology has any more potential to damage subsurface utilities than excavation. This technology should be retained for further consideration.
		Response —Comment noted. Chapter 3 has been modified significantly to ensure that potentially relevant technologies are properly considered for use at the Lower Subbase sites.
57	Page 3-31, Section 3.1.5.8, (Ex Situ-) Chemical Reduction/ Oxidation	This technology is eliminated because it would not be effective against TPH and PAH. However, it would be effective against other site contaminants, such as lead. This technology might be effective as part of a treatment train. Chemical oxidation/ reduction should, therefore, be retained for further consideration.
		Response —Comment noted. Chapter 3 has been modified significantly to ensure that potentially relevant technologies are properly considered for use at the Lower Subbase sites.

Comment No.	Section/Page	Comment
58	Page 3-41, Section 3.1.6.8, Ultraviolet Oxidation	Like many of the other technologies discussed, UV oxidation would most likely be used as part of a train of treatment technologies. When high concentrations of volatile organic compounds are present, an additional polishing step may be required to achieve discharge limits. In addition, pH adjustment and flocculation may be necessary to remove metals prior to treatment by UV oxidation. This comment applies also to the discussion on Page 3-42 regarding air stripping. <i>Response</i> —Comment noted.
59	Page 3-45, Section 3.1.7.1, Discharge to Atmosphere	The last sentence states that no offgas treatment will be required for ground-water treatment. This directly contradicts the statement at the bottom of Page 3-44 that off gas treatment will be considered for Zone 4. Please note that the substantive requirements of the State's Air Pollution Control Regulations apply to any air discharge. <i>Response</i> —Comment noted.
60a	Table 3-1, Summary of Initial Screening of Technologies and Process Options, Page 1	Monitoring —Monitoring should be retained for each of the seven zones, since contaminants may remain at concentrations in excess of remediation criteria. In some circumstances, the Remediation Standard Regulations require monitoring to evaluate the effectiveness of remedial actions, and to demonstrate compliance with the Regulations. <i>Response</i> —Comment noted. Chapter 3 has been modified significantly to ensure that potentially relevant technologies are properly considered for use at the Lower Subbase sites.
60b		Access/Use Restrictions —The use of physical barriers or notices should be retained for each of the seven zones. The text should also note that environmental land use restrictions will be recorded as specified in the Regulations if the based is ever closed and transferred to another entity as specified in the Regulations. <i>Response</i> —Comment noted. Chapter 3 has been modified significantly to ensure that potentially relevant technologies are properly considered for use at the Lower Subbase sites.
60c		Capping should be retained as an option for each of the seven zones. An asphalt cap could be used to comply with the Remediation Standard Regulation requirements regarding direct exposure. <i>Response</i> —Comment noted. Chapter 3 has been modified significantly to ensure that potentially relevant technologies are properly considered for use at the Lower Subbase sites.
61	Page 4-1, Section 4.1, Development of Remedial Alternatives	Lead and arsenic were also detected at concentrations in excess of the Pollutant Mobility Criteria. <i>Response</i> —Comment noted.
62	Page 4-2, Section 4.2, Description of Evaluation Criteria	This section is repeated verbatim for each of the seven zones. This section should be presented only once. <i>Response</i> —Comment noted.
63	Page 4-4, Section 4.3.1.2, Evaluation (Zone 1, Alternative 1)	Please add that lead and arsenic were detected at concentrations in excess of the Pollutant Mobility Criteria. <i>Response</i> —Comment noted.
64a	Page 4-6, Section 4.3.2.1, Description—Monitored Natural Attenuation	In the second paragraph, please provide an estimate of how long it would take for natural attenuation to achieve compliance with cleanup criteria. <i>Response</i> —Comment noted. An estimate will be included.

Comment No.	Section/Page	Comment
64b	Tiered Monitoring Program	<p>The Navy would conduct quarterly sampling until baseline conditions had been established. Once baseline conditions are established, the State would require monitoring to be conducted, at a minimum, on an annual basis. The report states that monitoring would continue as long as contaminants remained at concentrations in excess of "current industrial land use PRG." Please clarify that monitoring would continue as long as contaminants remain at concentrations in excess of any cleanup criteria, regardless of the land use scenario. This comment applies also to the second paragraph on Page 4-11.</p> <p>Response—Comment noted.</p>
65a	Page 4-7, Section 4.3.2.1, Description—Environmental Land Use Restriction	<p>The title of this section should be changed to "Institutional Controls." This change should be made throughout the FS wherever the term "Environmental Land Use Restriction" is used in the title of a remedial alternative. The Navy uses the term "environmental land use restriction" generically, to describe land use controls of any sort. It would be more appropriate to avoid the use of this term except when describing an environmental land use restriction as defined in the Regulations. Please see my comments above regarding site use restrictions on Page 3-3 (Section 3.1.1.2). As long as the Subbase remains under the Navy's control, institutional controls would be used instead of environmental land use restrictions. Institutional controls might include notations to the base master plan and base instructions, coordination with the base excavation permitting system, use of signs, and other methods. If the base is closed and transferred, the State would require that the Navy file environmental land use restrictions as prescribed by the Remediation Standard Regulations. This comment applies in each of the subsequent chapters to discussions regarding environmental land use restrictions.</p> <p>Response—Comment noted. See Comment No. 44a. Use will be limited.</p>
65b		<p>The report states that a deed restriction prohibiting residential land use would be put in place if contamination remained in shallow soil at concentrations exceeding the Residential Direct Exposure Criteria. If inaccessible soil exceeds the industrial/commercial Direct Exposure Criteria, residential use and excavation would have to be restricted. Please note that for this purpose, shallow soil should be defined as: soil at a depth of less than four feet below ground surface, or more than two feet below an asphalt surface with a minimum thickness of 6 in. The regulations provide that such soil is considered inaccessible. The Direct Exposure Criteria do not apply to inaccessible soil if an environmental land use restriction is in place to prevent the soil from being disturbed as the result of excavation, demolition, or other activities. The Navy may take advantage of the exemption from the Direct Exposure Criteria provided for inaccessible soil. To do so the Navy must maintain a minimum of four feet of clean fill in unpaved areas, or two feet of clean fill in areas with asphalt pavement. The pavement must have a minimum thickness of 6 in., and the pavement must be maintained in good condition.</p> <p>Response—Comment noted. See response to Comment No. 44a.</p>
66	Page 4-7, Section 4.3.2.2, Evaluation—Overall Protection of Human Health and the Environment	<p>Monitored Natural Attenuation also would not address lead and arsenic at concentrations in greater than the Pollutant Mobility Criteria.</p> <p>Response—Comment noted.</p>
67	Page 4-8, Section 4.3.2.2, Evaluation—Compliance with ARAR	<p>This alternative would not comply with the Remediation Standard Regulation requirements regarding pollutant mobility.</p> <p>Response—Comment noted.</p>
68a	Page 4-12, Section 4.3.3.2, Evaluation—Overall Protection of Human Health and the Environment	<p>The report states that it is unlikely the site would be used for residential purposes. However, if the base is closed, residential use could occur. An environmental land use restriction to prevent residential use of the property would be required if contamination were detected at concentrations exceeding the Residential Direct Exposure Criteria or volatilization criteria. Please revise the text.</p> <p>Response—Comment noted. The text will be changed accordingly.</p>

Comment No.	Section/Page	Comment
68b	Compliance with ARAR	This alternative would not address lead and arsenic at concentrations in excess of the GB Pollutant Mobility Criteria. Response —Comment noted. The text will be changed accordingly.
69a	Page 4-14, Section 4.3.4.1, Description (Zone 1 Alternative 4)—Selective Excavation/Offsite Disposal	This section discusses options to address contaminants detected at concentrations greater than remedial criteria “under the current industrial land use scenario. This terminology is confusing since it implies that only the industrial Direct Exposure Criteria are applicable. In fact, the soil and ground-water criteria in the Remediation Standard Regulations apply regardless of the hypothetical risk assessment scenario being used by the Navy. Response —Comment noted.
69b		This alternative must also address lead and arsenic, which were detected at concentrations greater than the Pollutant Mobility Criteria. Response —Comment noted.
69c		The Navy proposes to place a plastic liner in the hole prior to backfilling “if additional impacted soil is suspected.” This is unacceptable. The Navy will be required to demonstrate compliance with all the requirements of the Remediation Standard Regulations before remediation may be considered complete. Response —Comment noted. The text will be modified to clarify this issue.
69d		The Navy proposes to screen for PAH and TPH using a photoionization or flame ionization detector. PIDs and FIDs are designed to detect volatile organics. They are not suitable for screening for TPH or PAHs. The Navy should propose and use a more suitable method to screen for these contaminants. This change should be made throughout the report where the Navy proposes to use a PID or FID to screen for TPH or PAHs. The Navy proposes on Page 7-11 to use a portable XRF to screen soils in Zone 4 for lead. If this technique is used in Zone 4, it would be appropriate to also use it in Zone 4, as well as all other zones where lead in soil is to be addressed. Response —Comment noted. Discussions of alternate field screening methods will be presented.
70	Page 4-16, Section 4.3.4.1, Description (Zone 1 Alternative 4)—Tiered Monitoring Program	Monitoring must continue as long as contaminants remain at concentrations greater than cleanup criteria. Please see Section 22a-133k-3(g)(3) for requirements regarding discontinuation of ground-water monitoring. Response —Comment noted. The text will be changed accordingly.
71	Page 4-17, Section 4.3.4.2, Evaluation—Overall Protection of Human Health and the Environment	Would lead and or arsenic remain at concentrations greater than the Pollutant Mobility Criteria? Please note that the Pollutant Mobility Criteria apply only to soils located above the seasonal high water table. Please clarify. This comment applies also to the discussion in the next paragraph regarding compliance with ARARs. Response —Comment noted. The text will be modified to clarify this issue.
72	Page 4-18, Section 4.3.4.2, Evaluation—Reduction of Toxicity, Mobility, and Volume	The text states that <i>in situ</i> biodegradation would not address arsenic in soil. It should also state that it would not address lead in soil. Response —Comment noted. The text will be changed accordingly.
73	Page 4-21, Section 4.4.1, Overall Protection of Human Health and the Environment	This paragraph discusses mercury and PAHs in Zone 1 soil. Previous discussions regarding Zone 1 discussed lead and arsenic, not mercury. Mercury is not listed on Figures 2-1 or 2-2, which depict the location of contaminants in Zone 1. Please clarify. This comment applies also to the discussion on Page 4-21 in Section 4.4.4, and to the discussion on Page 4-22 in Section 4.4.5. Response —Comment noted. The text will be modified to clarify this issue.

Comment No.	Section/Page	Comment
74	Page 4-21, Section 4.4.2, Compliance with Applicable or Relevant and Appropriate Requirements	Alternatives 1, 2, and 3 would not comply with the pollutant mobility requirements for metals.
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns regarding technology evaluation and selection.
75	Page 4-21, Section 4.4.4, Reduction of Toxicity, Mobility, and Volume Through Treatment	The discussion implies that toxicity, mobility, and volume would be reduced through treatment. None of the alternatives would include treatment of soil. Please revise the text accordingly. Please make this change throughout the document, since none of the alternatives considered for any of the zones include treatment of contaminated soil.
		<i>Response</i> —Comment noted. The text will be changed accordingly.
76	Page 4-23, Section 4.4.6, Implementability	The text states that Alternative 1 (No Further Action) can't be implemented because remedial action objectives would not be met. Whether or not an alternative meets remedial objectives is not a criteria for determining whether it can be implemented. The ability of an alternative to meet remedial action objectives would be evaluated under other criteria. This comment applies to the comments in each of the subsequent chapters regarding implementability.
		<i>Response</i> —Comment noted. The text will be changed accordingly.
77	Page 4-23, Section 4.4.7, Cost	The first paragraph states that preliminary cost estimates are supposed to be within -30% to +50% of actual costs. Preliminary cost estimates are, in fact, expected to meet actual costs within a range of -50% to +30%.
		<i>Response</i> —Comment noted. The text will be changed accordingly.
78a	Table 4-2, Summary of Comparative Analysis of Remedial Alternatives- Zone 1—Overall Protectiveness- Environment, and Compliance with Applicable or Relevant and Appropriate Requirements	Alternatives 1 to 3 would not meet pollutant mobility criterion for lead. None of the alternatives would involve treatment of soil.
		<i>Response</i> —Comment noted. The text will be changed accordingly.
78b	Long-Term Effectiveness and Permanence	Alternatives 1, 2, and 3 would not meet Pollutant Mobility Criteria for lead and arsenic.
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns regarding technology evaluation and selection.
78c	Reduction of Toxicity, Mobility, and Volume Through Treatment	None of the alternatives include treatment and none would satisfy the statutory preference for treatment.
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
79a	Page 5-1, Section 5.1, Development of Remedial Alternatives (Zone 2)	Additional remedial alternatives, including selective excavation, must be evaluated. Contaminants are present at concentrations greater than the direct exposure and Pollutant Mobility Criteria, as well as other ARARs.
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
79b		Lead was also present at concentrations greater than the pollutant mobility criterion. Please discuss in the text.
		<i>Response</i> —Comment noted. The text will modified accordingly.

Comment No.	Section/Page	Comment
80	Page 5-5, Section 5.3.2.2, Evaluation—Overall Protection of Human Health and the Environment	This section should discuss the presence of contaminants other than TPH at concentrations greater than cleanup criteria. <i>Response</i> —Comment noted. The text will be modified accordingly.
81	Table 5-1, Comparison of Feasible Remedial Alternatives	Additional alternatives to address the requirements of the Remediation Standard Regulations must be considered. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
82a	Table 5-2, Summary of Comparative Analysis of Remedial Alternatives—Zone 2—Overall Protectiveness—Environment	Alternatives 1 and 2 would not address pollutant mobility risks posed by lead in soil. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
82b	Compliance With Applicable or Relevant and Appropriate Requirements	Please revise this table to acknowledge that none of the listed alternatives would comply with the requirements of the Remediation Standard Regulations regarding pollutant mobility. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
82c	Reduction of Toxicity, Mobility, and Volume Through Treatment	Alternative 2 would not satisfy the statutory preference for treatment. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
82d	Implementability- Ability to Obtain Approvals and Coordinate with Other Agencies	Delete the language under Alternatives 1 and 2 and replace with, “No permits or other regulatory approvals required.” <i>Response</i> —Comment noted. The text will be modified as requested.
83	Page 6-1, Section 6.1, Development of Remedial Alternatives (Zone 3)	The second paragraph states that it is unlikely that the property would be used for residential purposes. However, if the base is closed, then it is possible the site might be used for residential purposes. The FS must consider this possibility. The text also states that PAH concentrations in shallow soil “are below typical non- industrial urban background soil concentrations for New England.” This fact is irrelevant. The Remediation Standard Regulations do not allow the use of regional, non- site-specific data in setting cleanup objectives. Please see the definition of “background concentration for soil,” which is listed in Section 22a-133k-1 (a)(6) of the Regulations. <i>Response</i> —Comment noted.
84a	Page 6-7, Section 6.3.2.2, Evaluation—Long Term Effectiveness and Permanence	The text states that “remediation of lead concentrations beneath Building 31 has been completed.” This remediation was completed as a Removal Action in 1994, prior to the adoption of the Remediation Standard Regulations. The cleanup criteria used during the Removal Action (5 mg/L TCLP lead and 500 mg/kg total lead) did not comply with CTDEP policy at the time the work was done, or the subsequently adopted requirements of the Remediation Standard Regulations. Compliance with the Regulations is required under the current Remedial Action. <i>Response</i> —Comment noted.

Comment No.	Section/Page	Comment
84b	Implementability	Alternative 2 does involve the use of institutional controls. Please revise this paragraph. Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
85a	Page 6-8, Section 6.3.3.1, Alternative 3- Description	The Navy proposes to use a PID or FID to monitor for PAHs. Please propose a more suitable method to monitor for PAH as well as TPH. Response —Comment noted. Please see response to Comment No. 69d.
85b		The Navy proposes to place a plastic liner in the hole prior to backfilling “if additional impacted soil is suspected.” This is unacceptable. The Navy will be required to demonstrate compliance with all the requirements of the Remediation Standard Regulations before remediation may be considered complete. Response —Comment noted. Please see response to Comment No. 69c.
86a	Table 6-2, Page 3— Implementability	The “ability to obtain approvals...” criterion refers to the ability to obtain permits and other approvals to carry out an alternative. It does not refer to whether or not the regulators will accept or reject a particular alternative. Response —Comment noted.
86b	Reduction of Toxicity, Mobility, and Volume Through Treatment	None of the alternatives includes treatment, and none would satisfy the statutory preference for treatment. Response —Comment noted.
87	Page 7-1, Section 7.1, Development of Remedial Alternatives	Please revise the text to acknowledge that if the site were ever to close, then residential land use is possible. Response —Comment noted.
88	Page 7-6, Section 7.3.2.1, Description—Monitored Natural Attenuation	The second paragraph states that volatile organic compound concentrations can be slow to biodegrade. I believe the author meant to more specifically state that chlorinated volatile organic compounds may biodegrade slowly. Please see the second paragraph of the section entitled “Monitored natural Attenuation” on Page 7-12. Response —Comment noted.
89	Page 7-6, Section 7.3.2.1, Description—Tiered Monitoring Program	Please clarify that second tier monitoring would be carried out if specific criteria were exceeded. The plan should also specify that actual remediation will be conducted if warranted. Response —Comment noted.
90a	Page 7-9, Section 7.3.2.2, Evaluation—Compliance with ARAR	The text states that “lead concentrations in excess of industrial land use PRG would be addressed through ELUR.” Please add that this option would not comply with the Pollutant Mobility Criteria. Response —Comment noted. Chapter 7 has been modified to allow for better alternative selection to enable compliance with ARARs and TBC criteria.
90b	Reduction of Toxicity, Mobility, and Volume Through Treatment	This option does not involve any treatment of soil or ground water. The last two sentences of this paragraph appear to contradict each other. If physical and chemical processes will reduce the concentration of inorganic compounds in ground water, then natural attenuation would be <i>likely</i> to reduce the toxicity, mobility or volume of these contaminants. Response —Comment noted. Chapter 7 has been modified to allow for better alternative selection to enable compliance with ARARs and TBC criteria.
91a	Page 7-11, Section 7.3.3.1, Description— Selective Excavation and Offsite Disposal	The Navy proposes to use a PID or FID to screen for PAHs and TPH. These instruments would not be effective for this purpose. The Navy appropriately proposes to use portable XRF to screen for lead in soil this zone. XRF should be used to screen for lead and other inorganic wherever excavation will be conducted. Please refer to the attached New England Waste Management Official’s Organization advisory opinion regarding the use of XRF. Response —Comment noted. Please refer to response to Comment No. 69d.

Comment No.	Section/Page	Comment
91b		The report notes that lead, measured by TCLP, was detected near Building 80 "at concentrations above industrial land use PRG." Please clarify that lead was detected at concentrations greater than the GB pollutant mobility criterion. Were any samples analyzed for lead using the SPLP method? Response —Comment noted. The text will be modified accordingly.
92	Page 7-12, Section 7.3.3.1, Description—Monitored Natural Attenuation	The Navy speculates that lead concentrations in ground water would decrease as a result of physical processes such as dispersion, adsorption, and dilution. It is unlikely that this would occur in an acceptable time frame unless the source of the lead was removed from soil or made immobile. The statement that natural attenuation will decrease the concentration of inorganic compounds contradicts earlier statements that natural attenuation would not be effective on inorganics. Response —Comment noted. The text will be modified accordingly.
93	Page 7-15, Section 7.3.3.2, Evaluation—Reduction of Toxicity, Mobility, and Volume Through Treatment	This option does not involve any treatment of contaminated soil or ground water. Response —Comment noted. Chapter 7 has been modified to allow for better alternative selection to enable compliance with ARARs and TBC criteria.
94a	Page 7-17, Section 7.3.4.1, Description-Alternative 4	A PID or FID would not be effective in screening for PAH or TPH. Response —Comment noted. Please refer to response to Comment No. 69d.
94b		Soil would be excavated to a minimum depth of 4.5 ft to comply with the Pollutant Mobility Criteria. Please note that the Pollutant Mobility Criteria do not apply to soils below the seasonal high water table in a GB area. What is the depth of the water table in this area? Were any soil samples from this area analyzed for lead using the SPLP method? Response —Comment noted. The text will be reviewed and modified to clarify the depth of the excavation.
94c		The Navy proposes to place a plastic liner in the hole prior to backfilling "if additional impacted soil is suspected." This is unacceptable. The Navy will be required to demonstrate compliance with all the requirements of the Remediation Standard Regulations before remediation may be considered complete. Response —Comment noted. Please refer to response to Comment No. 69c.
95	Page 7-18, Section 7.3.4.1, Description-Alternative 4—Ground-Water Extraction and Treatment	Please specify what is meant by UCL slightly above the volatilization criteria. The term "UCL" should not be used generically in placed of the term "concentration." The term UCL should only be used in describing the results of statistical evaluation of the results of analytical data for a group of samples. Where analytical results for individual samples are being discussed, the term "concentration" should be used. Response —Comment noted.
96a	Page 7-19 Description-Alternative 4—Ground-Water Extraction and Treatment	In the third paragraph, delete "CTPDES" and replace it with "Connecticut Water Discharge." Response —Comment noted. The text will be modified as requested.

Comment No.	Section/Page	Comment
96b		<p>The third paragraph states that the selective excavation program "may substantially reduce or eliminate the source areas for COC migration to ground water," likely resulting in "decreased COC concentrations in ground water." The areas where soil will be removed to address "hot spot" contamination have no apparent relationship to the proposed location of ground-water extraction wells. The hot spots do not appear to be upgradient of or in close proximity to proposed locations for ground-water extraction wells. It is difficult to see how excavation in the locations shown would, by itself, cause lead concentrations to decrease in the areas where the wells would be installed.</p> <p>Response—Comment noted.</p>
96c	Tiered Monitoring Program	<p>Please clarify that second tier monitoring would be carried out if specific criteria were exceeded. The plan should also specify that actual remediation will be conducted if warranted.</p> <p>Response—Comment noted.</p>
97	Page 7-24, Section 7.4.3, Long Term Effectiveness and Permanence	<p>Please delete the first sentence. Alternatives 2 and 3 would be less effective than Alternatives 3 and 4 because Alternatives 2 and 3 would leave in place material with contaminant concentrations greater than the RSR criteria.</p> <p>Response—Comment noted. The text will be modified as requested.</p>
98a	Page 7-25, Section 7.4.4, Reduction of Toxicity, Mobility, and Volume Through Treatment	<p>None of these alternatives involves treatment of soil. Only Alternative 4 involves treatment of ground water.</p> <p>Response—Comment noted. Chapter 7 has been modified to allow for better alternative selection to enable compliance with ARARs and TBC criteria.</p>
98b		<p>In the second paragraph, the Navy proposes to expand ground-water monitoring if contaminants remain at concentrations greater than the Surface Water Protection Criteria. Please note that the volatilization criteria apply also. The Navy must propose additional remedial action if contamination is detected at concentrations greater than the surface water protection or volatilization criteria.</p> <p>Response—Comment noted.</p>
99a	Table 7-2, Summary of Comparative Analysis of Alternatives- Zone 4— Compliance with Applicable or Relevant and Appropriate Requirements	<p>Alternative 2 would not address lead concentrations that exceed the direct exposure criterion.</p> <p>Response—Comment noted. Chapter 7 has been modified to allow for better alternative selection to enable compliance with ARARs and TBC criteria.</p>
99b	Reduction of Toxicity, Mobility, and Volume Through Treatment	<p>None of the alternatives would involve treatment of soil, and only Alternative 4 would involve treatment of ground water. Only Alternative 4 would satisfy the statutory preference for treatment.</p> <p>Response—Comment noted. Chapter 7 has been modified to allow for better alternative selection to enable compliance with ARARs and TBC criteria.</p>
99c	Implementability- Ability to Obtain Approvals and Coordinate with Other Agencies	<p>Delete the language under Alternative 1, and replace with: "No permits or other regulatory approvals required."</p> <p>Response—Comment noted.</p>
100	Page 8-1, Section 8.1, Development of Remedial Alternatives	<p>Lead was also detected at concentrations greater than the Pollutant Mobility Criteria.</p> <p>Response—Comment noted.</p>

Comment No.	Section/Page	Comment
101	Page 8-5, Section 8.3.3.2, Evaluation	The text states that residential use of the base is unlikely. However, if the base is closed, then residential use is a possibility. <i>Response</i> —Comment noted.
102a	Page 8-6, Section 8.3.3.2, Evaluation—Compliance with ARAR	Alternative 2 would not comply with the Pollutant Mobility Criteria of the Remediation Standard Regulations. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
102b	Reduction of Toxicity, Mobility, and Volume Through Treatment	Please delete the last sentence. Alternative 2 would not address the pollutant mobility criterion for lead. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
102c		This alternative does not involve any treatment. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
103	Page 8-7, Section 8.3.3.1, Selective Excavation and Offsite Disposal	The Navy proposes to use a PID or FID to screen for TPH. Neither of these instruments is suitable for this purpose. Since lead is also present in the soil, the Navy should also propose a suitable method to screen the soil for lead. <i>Response</i> —Comment noted. Please refer to response to Comment No. 69d.
104	Page 8-8, Section 8.3.3.1, Selective Excavation and Offsite Disposal	The Navy proposes to place a plastic liner in the hole prior to backfilling “if additional impacted soil is suspected.” This is unacceptable. The Navy will be required to demonstrate compliance with all the requirements of the Remediation Standard Regulations before remediation may be considered complete. If the Navy wishes to provide a marker to identify the extent to which excavation took place, orange snow fence would be more suitable. Snow fence was successfully used for this purpose at the Raymark Industries NPL site in Stratford, Connecticut. <i>Response</i> —Comment noted. Please refer to response to Comment No. 69c.
105a	Page 8-9, Section 8.3.2.2, Evaluation—Compliance with ARARs	The text notes that contaminants were found in soil at concentrations greater than the “CTDEP industrial criteria,” and that the alternative would be carried out “in accordance with location- specific and action- specific ARAR.” Please revise the text to note that contaminant concentrations were also greater than the GB Pollutant Mobility Criteria. Will this alternative comply also with chemical specific ARARs? <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
105b	Reduction of Toxicity, Mobility, and Volume Through Treatment	Alternative 3 would not address the pollutant mobility criterion for lead. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
106	Page 8-10, Section 8.4.2, Compliance with ARARs	Alternative 2 would not comply with the Pollutant Mobility Criteria of the Remediation Standard Regulations. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
107	Page 8-11, Section 8.4.3, Long- Term Effectiveness and Permanence	Alternative 2 would be less effective in achieving Remedial Action Objectives than Alternative 3. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.

Comment No.	Section/Page	Comment
108	Page 8-11, Section 8.4.4, Reduction of Toxicity, Mobility, and Volume Through Treatment	None of these alternatives involves treatment of soil or ground water.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
109	Page 8-12, Section 8.4.5, Short Term Effectiveness	In the second paragraph, lead should be discussed also. This alternative does not comply with the pollutant mobility requirements for lead.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
110a	Table 8-2, Summary of Comparative Analysis of Alternatives- Zone 5— Compliance with Applicable or Relevant and Appropriate Requirements	Alternative 2 would not comply with the Pollutant Mobility Criteria.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
110b	Reduction of Toxicity, Mobility, and Volume Through Treatment, Page 2	Please revise to indicate that none of the proposed alternatives includes treatment of soil or ground water. Alternative 3 does not satisfy the statutory preference for treatment.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
110c	Implementability- Ability to Obtain Approvals and Coordinate with Other Agencies	Delete the language under each alternative and replace with, "No permits or other regulatory approvals required."
		Response —Comment noted. The text will be modified as requested.
111	Page 9-1, Section 9.1, Development of Remedial Alternatives	The report must consider contaminants that exceed remedial criteria under all land use scenarios, not just the industrial land use scenario. For this reason, additional alternatives that actively address the contamination must also be developed.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
112a	Page 9-6, Section 9.3.2.2, Evaluation—Compliance With ARAR	Alternative 2 would not address lead at concentrations greater than the GB Pollutant Mobility Criteria. This alternative would not comply with ARARs.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
112b	Reduction of Toxicity, Mobility, and Volume Through Treatment	Please revise to indicate that Alternative 2 does not include treatment of soil or ground water.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
113	Page 9-7, Section 9.4.1, Overall Protection of Human Health and the Environment	Alternative 2 would not be protective because it does not address lead and TPH which were detected in soil at concentrations greater than the Pollutant Mobility Criteria and Direct Exposure Criteria.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.

Comment No.	Section/Page	Comment
114a	Page 9-7, Section 9.4.2, Compliance with Applicable or Relevant and Appropriate Requirements	If the base is closed, then residential land use would be more likely. Please revise the text.
		Response —Comment noted. The text will be revised accordingly.
114b		Alternative 2 would not comply with the Pollutant Mobility Criteria or Direct Exposure Criteria.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
115	Page 9-7, Section 9.4.3, Long Term Effectiveness and Permanence	Alternative 2 would not comply with ARARs, and would not achieve remedial action objectives.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
116	Page 9-9, Section 9.4.7, Cost	The report should say that capital costs are highest for Alternative 2, and lowest for Alternative 1.
		Response —Comment noted. The text will be modified accordingly.
117a	Table 9-2, Summary of Comparative Analysis of Remedial Alternatives—Zone 6—Overall Protectiveness—Environment	For both alternatives, please delete the statement that “COC does not exceed Pollutant Mobility” and replace it with “Lead is present at a concentration greater than the pollutant mobility criterion.” For Alternative 1, delete the language under Potential Onsite Receptors, and replace it with “TPH exceeds direct exposure criterion.”
		Response —Comment noted. The text will be modified accordingly.
117b	Reduction of Toxicity, Mobility, and Volume Through Treatment	Alternative 2 would not satisfy the statutory preference for treatment.
		Response —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
117c	Implementability	Under “Ability to obtain approvals...,” delete the language under Alternative 1 and replace with, “No permits or other regulatory approvals required.”
		Response —Comment noted. The text will be modified as requested.
118a	Page 10-7, Section 10.3.2.2, Evaluation	The first paragraph states that it is unlikely the property would be transferred for residential reuse. If the base is closed, residential use cannot be discounted.
		Response —Comment noted.
118b		The second paragraph states the contaminated sediment was dredged, and later replaced with clean fill. The dredging referred to was done to prepare for home porting the <i>Seawolf</i> class submarines at the Subase. It is unlikely, therefore, that clean fill was placed following dredging.
		Response —Comment noted. The text will be modified accordingly.
119	Page 10-9, Section 10.3.3.1, Description, Paragraph 1	The Navy proposes to screen for PAHs using a PID or FID. Neither of these instruments is suitable for this purpose. Please propose another technique to screen for the presence of PAHs in soil.
		Response —Comment noted. Please see response to Comment No. 69d.
120	Page 10-10, Section 10.3.3.1, Description Paragraph 1	Please clarify that monitoring would continue as long as contaminants remain at concentrations in excess of any cleanup criteria.
		Response —Comment noted. The text will be modified accordingly.

Comment No.	Section/Page	Comment
121	Page 10-11, Section 10.3.3.2, Evaluation—Compliance with ARAR	Institutional controls equivalent to an environmental land use restriction will be required if contaminants remain at concentrations exceeding the direct exposure or Pollutant Mobility Criteria. The last sentence states that Alternative 3 would be conducted in accordance with action and location specific ARARs. Would it also be conducted in accordance with chemical specific ARARs?
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
122	Page 10-12, Section 10.3.3.2, Evaluation—Reduction of Toxicity, Mobility and Volume Through Treatment	None of the proposed alternatives make use of treatment.
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
123	Page 10-13, Section 10.4.1, Overall Protection of Human Health and the Environment	The second paragraph states that it is unlikely that the site would be used for residential purposes. However, if the base is closed, then it is possible the Lower Base might be used for residential purposes.
		<i>Response</i> —Comment noted.
124	Page 10-14, Section 10.4.2, Compliance with Applicable or Relevant and Appropriate Requirements	Please delete the first sentence. Replace it with “Alternatives 1 and 2 would not comply with ARARs. Alternative 3 would comply with ARARs, including the Pollutant Mobility Criteria of the State’s Remediation Standard Regulations.
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
125a	Table 10-2, Summary of Comparative Analysis of Remedial Alternatives- Zone 7—Overall Protectiveness- Environment	Alternatives 1 and 2 would not comply with the Pollutant Mobility Criteria requirements and would not protect potential offsite receptors.
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
125b	Compliance with Applicable or Relevant and Appropriate Requirements	Alternatives 1 and 2 would not comply with the pollutant mobility requirements and therefore would not comply with chemical specific ARARs.
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
125c	Reduction of Toxicity, Mobility, and Volume Through Treatment	None of the alternatives would satisfy the statutory preference for treatment, since none of them include treatment.
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
125d	Implementability- Ability to Obtain Approvals and Coordinate with Other Agencies	Delete the language under Alternative 1 and replace with, “No permits or other regulatory approvals required.”
		<i>Response</i> —Comment noted. The text will be modified as requested.
126	Page 11-1, Section 11.1, Summary of Remedial Alternatives	Monitored natural attenuation and tiered monitoring should be retained for selected contaminants in all seven zones. Selective excavation should be retained for Zones 2 and 6.
		<i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.

Comment No.	Section/Page	Comment
127	Page 11-3, Section 11.2.3, Tiered Monitoring Program	Monitoring will be required in all zones where contaminants remain at concentrations greater than cleanup criteria. <i>Response</i> —Comment noted.
128a	Page 11-3, Section 11.2.4, Monitored Natural Attenuation	Monitored natural attenuation should be retained for organic contaminants in all zones. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
128b		The Navy proposes in the third paragraph to conduct coordinated monitoring that would look at the Lower Base as a whole, rather than considering it as a group of isolated sites. The State agrees that this is a useful approach. <i>Response</i> —Comment noted.
129	Page 11-4, Section 11.2.5, Selective Excavation and Offsite Disposal	Contaminants are present in the soil in all seven zones at concentrations greater than cleanup criteria. Selective excavation and offsite disposal should be retained for all seven zones. <i>Response</i> —Comment noted. Chapters 3 through 10 have been modified to better address CTDEP concerns about technology evaluation and selection.
130	Appendix B Preliminary Remedial Goal Calculations	The source of the analytical data used in the calculations is unclear. The UCL data provided for various pollutants do not agree with the UCL data presented in Appendix D-1. <i>Response</i> —Commented noted. The data will be modified to clarify the calculations.
131	Appendix C Dilution Factor Calculations	The dilution factors presented here were not calculated in accordance with either Section 22a-133k-2(c)(2)(E) of the Remediation Standard Regulations (site-specific dilution for the Pollutant Mobility Criteria), or with Section 22a-133k-3(b)(3) (alternative Surface Water Protection Criteria). The site-specific dilution factor for the Pollutant Mobility Criteria considers the hydrogeologic characteristics of the aquifer. Since the Pollutant Mobility Criteria protect ground water, this dilution factor does not consider flow characteristics of a surface water body. <i>Response</i> —Comment noted. The dilution factors have been evaluated and recalculated.