

FOSTER WHEELER ENVIRONMENTAL CORPORATION
U.S. NAVY NORTHERN DIVISION REMEDIAL ACTION CONTRACT (RAC)
CONTRACT NO. N62472-94-D-0398
OVER THE BANK DISPOSAL AREA NORTHEAST
NAVAL SUBMARINE BASE - NEW LONDON - GROTON, CT

ANNOTATED RESPONSES TO USEPA REVIEW COMMENTS

The following are responses to USEPA review comments on the Draft Work Plan Amendment for the Over the Bank Disposal Area Northeast (OBDANE), dated July 26, 2000 for the Naval Submarine Base New London. EPA comments are provided in italic type followed by Foster Wheeler's responses in bold type.

Reviewer: K. Keckler (USEPA)

Date: August 15, 2000

Comment 1: EPA recommends that the proposed removal action address all of the contamination at the OBDANE site in order to reduce risk to human health and the environment to acceptable levels. This approach will eliminate the need for further study and enable us to close the site out under CERCLA. Although it is my hope that the Closeout Report will be able to be used as the basis for a No Action ROD under CERCLA, it is unclear if the removal action as currently planned will accomplish this objective.

Response: As indicated below, the clean-up criteria chosen for the OBDANE site will be the same as that of the Area A Downstream site. The use of this criteria is protective of both ecological and human receptors at this site. The text has been changed to include this comment.

Comment 2: As you know, the Phase II Remedial Investigation identified unacceptable risks to ecological receptors. EPA is concerned that the work plan and the action memorandum did not clearly specify cleanup goals for the site. Although risks to human health may be deemed acceptable, the removal action needs to address ecological risks posed by the OBDANE. In the absence of risk-based preliminary remediation goals, EPA recommends that the Preliminary Remediation Goals for Wildlife (Efroymsen et al., 1997) or background values, whichever is higher, should be used for an ecologically based cleanup goal. Clearly, the development of site-specific cleanup goals will result in less conservative cleanup goals than the screening values cited above, but this may take more time than is currently allotted by the project schedule. It is critical that the cleanup goals established for the site ensure that the site does not pose a risk to the environment after the soil and debris removal is complete. Given the proximity of the site to the Area A Downstream, EPA believes that it is appropriate to use the same cleanup goals for the OBDANE site as for the Area A Downstream site. However, other contaminants (including antimony, arsenic, chromium, and vanadium) were shown to contribute to the ecological risk at OBDANE. EPA recommends that the Navy consider what additional costs, if any, would be incurred if such goals were achieved.

Response: The clean-up criteria chosen for the OBDANE site will be the same as for the Area A Downstream site. This remedial goal does address ecological risk. For those metals not addressed within the OBDA Area A Downstream criteria, the CTDEP

SPLP Industrial/Commercial criteria will be applied. The text has been changed to include this comment.

Comment 3: The volume of soil to be removed should be estimated in Section 1.2.4 of the work plan.

Response: Approximately 100 tons of various surface debris and approximately 300 tons of potentially contaminated soil has been estimated and included within Sections 1.2.4 and 1.2.5 respectively.

Comment 4: In Section 3.0 of the work plan the text under the Waste Characterization Sampling and Analysis appears contradictory. EPA believes that it is critical to conduct confirmatory sampling after the removal action to ensure that the cleanup goals have been met and trusts that this will be done.

Response: Confirmatory sampling will be performed to ensure that cleanup goals have been met. This discussion has been updated within Section 3.0 of the Work Plan Amendment.

Comment 5: In section 3.2.3, the desired depth of the soil excavation - and the basis for it - should be specified.

Response: The desired depth is approximately two-feet, based on the distribution of surficial debris at the site resulting in contamination limited to the upper two feet of soil. Section 3.0 has been updated to include this comment.

Comment 6: EPA did not receive a copy of the project schedule referenced in Figure 6-1. I understand from the restoration advisory board meeting on August 9, 2000 that the Navy plans to start this work soon. I trust that we will be able to resolve the issues herein in a timely manner such that the aggressive project schedule can be met.

Response: The project is currently scheduled to begin in early April 2001. Figure 6-1, containing the project schedule, is included in the Final Work Plan Amendment.