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

May 30, 2000

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

Re: Response to Comments on the Draft Feasibility Study for Site 20 - Area A Weapons Center at the Naval Submarine Base New London, in Groton, Connecticut

Dear Mr. Evans:

EPA reviewed the Navy's Responses to EPA Comments on the Draft Feasibility Study Site 20 - Area A Weapons Center Naval Submarine Base New London, Groton, Connecticut dated May 3, 2000. Comments are presented below for the responses that do not appear to adequately address the original EPA comments or for which clarification is required. The comment identification system used in the response document has been maintained. Detailed comments are provided in Attachment A.

General comment 3 has not been adequately addressed. For the benefit of the reader, please include a more detailed description of the bunker area history, including the bunker reconstruction and associated soil removal that occurred in the 1980s. What areas of the site were impacted by the reconstruction? If this information was included in the RI, please summarize it in the FS. A premise expressed in this FS is that pavement and buildings have prevented soil contamination in the general bunker area. It is important to note, however, that the historical existence of the pavement is not apparent. Even if the pavement is not a historical feature at the site, the extent of soil removal in the 1980s may explain that any contamination that may have existed was removed.

General comment 4 has not been adequately addressed. EPA's suggestion of a pre-remedial sampling task focusing on PAH contamination in shallow soil throughout the site has not been accepted. EPA expects to discuss this issue further during the remedial design phase of the project.

The FS should discuss in more detail the procedures that need to be followed to bring the site into compliance with Connecticut RSRs. Please refer to the discussion in the FS in Chapter 2, page 5 of 20, regarding compliance criteria. Because the UCL of the mean for certain COCs in soil and sediment exceeds the RSR numerical criterion, the soil and sediment for the entire site is

considered out of compliance. The FS must specify what actions will be taken to make the alternative ARAR compliant. Simply removing soil or sediment from the vicinity of the sample that exceeds the RSR is not sufficient to demonstrate compliance.

It is assumed that the drainage ditches at the site convey stormwater from the site and from some upgradient areas to downgradient areas. As such, these ditches would be wet at certain times but dry for much of the year. Although the Connecticut RSRs may not technically apply to sediment, the sediment in these ditches is more like soil than it is like sediment in a continuously flowing stream. In fact, the sediment in these ditches may be contacted more frequently than most soil at the site in order to maintain the ditches. In summary, the RSRs should be considered relevant and appropriate requirements for remediation of this site.

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

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT
Darlene Ward, NSBNL, Groton, CT
Jennifer Stump, Gannett Fleming, Harrisburg, PA
Chip McLeod, EA, Newburgh, NY

ATTACHMENT A

Page	Comment
Figure 1-7	The response is not adequate. The FS must explain how the limits of Site 20 have been established.
Ch. 2, p. 6, § 2.2.5.2	The action EPA requested has not been taken and the proposed action is not appropriate. Federal water quality criteria are ARARs that may be superseded by Connecticut criteria, but where they are not superseded, they are applicable.
Ch. 2, p. 6, § 2.2.5.2	Section 402 of the Clean Water Act is "Applicable." Promulgated regulations or statutes are not "To be considered."
Ch. 2, p. 8, § 2.2.5.3	Section 402 of the Clean Water Act is "Applicable." Promulgated regulations or statutes are not "To be considered."
Ch. 2, p. 9	The action EPA requested has not been taken and the proposed action is not appropriate. Federal water quality criteria are ARARs that may be superseded by Connecticut criteria, but where they are not superseded, they are applicable.
Ch. 2, p. 12	Change the first sentence of the proposed text to: "*RDEC are more stringent than ICDEC, however ICDEC are permissible as long as ELURs are established and maintained as a component of the selected remedy.*" The last paragraph of the response should indicate that the boundaries of Site 20 must be surveyed and recorded on the base master plan and any subsequent land transfer documents as required by applicable federal, state and local requirements and the ROD."
Table 2-1, p. 1	The response to the comment on the Clean Water Act, Section 402 is not what was requested and the proposed action is not appropriate. Federal water quality criteria are ARARs that may be superseded by Connecticut criteria, but where they are not superseded, they are applicable. Section 402 of the Clean Water Act is "Applicable." Promulgated regulations or statutes are not "To be considered."
Ch. 4, p. 7, ¶5	This response suggests that contaminated soil exists beneath the pavement, which is why EPA suggested in an earlier comment that a pre-remedial sampling program be included in the FS to evaluate the shallow soil throughout the site.
Ch. 4, p. 8, ¶3 & p.17, ¶4	Keep EPA's requested text since the threat posed by the exceedance is ongoing and unaddressed in both the short- and long-term under this Alternative.

Ch. 4, p. 9, ¶3 The EPA comment refers to the first sentence under "Selective Excavation..." (the last paragraph on the page).

Table 4-4 There is no monitoring requirement for Alternative 3b since no risks will remain at the site after the excavation under the Alternative.

Table 4-4, p. 2 Please refer to earlier comments regarding the Clean Water Act, which should be treated as an ARAR. Section 402 of the Clean Water Act is "Applicable." Promulgated regulations or statutes are not "To be considered."