



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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BOSTON, MASSACHUSETTS 02114-2023

N00129.AR.000971
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February 12, 2003

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 EPA Comments on the Final Remedial Action Report for Soil and Sediment Removal at Operable Unit 7 - Area A Weapons Center (Site 20)

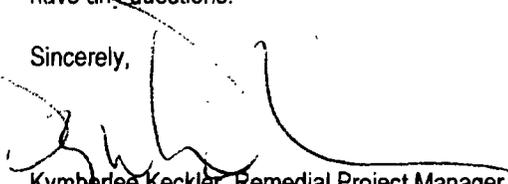
Dear Mr. Evans:

EPA reviewed the Navy's responses dated January 13, 2003 to EPA's August 26, 2002 comments on the *Final Remedial Action Report for Soil And Sediment Removal at Operable Unit 7 - Area A Weapons Center (Site 20)*. Detailed comments are provided in Attachment A.

EPA remains concerned about how this project was managed. None of the field QC samples required by the Work Plan were collected; VOC samples were collected inappropriately from composited samples; the four asphalt recyclers listed in the Final Work Plan were not contacted during the course of the remediation; and the stated preference in the ROD for recycling of contaminated soil and sediment by asphalt batching was not satisfied even though at least one Connecticut facility, Phoenix Environmental, could have provided the required service. It is apparent from the Navy's response to comments on the Draft Remedial Action Report and from the discussion in Section 3.3 of the Final Remedial Action Report, that the Navy made an economics-based decision to landfill the waste material in violation of the intent of the ROD.

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

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

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

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ATTACHMENT A

<u>Comment</u>	<u>Rebuttal</u>
1	<p>The Final Work Plan states in Section 2.3.5: <i>"The excavated soil and sediment will be treated with thermoplastic stabilization/solidification (i.e., asphalt batching) at a Foster Wheeler-approved facility. One of the following asphalt batching facilities may be utilized, pending approval by Foster Wheeler and the Navy:</i></p> <ul style="list-style-type: none">· <i>ARC (Elliott, Maine)</i>· <i>Bardon Trimount (Stoughton, Massachusetts)</i>· <i>ESMI (Louden, New Hampshire)</i>· <i>Phoenix Environmental (Waterbury, Connecticut)</i> <p><i>If asphalt batching is not possible based on the results of waste characterization sampling or due to permitting constraints, the material will be disposed at an off-site licensed disposal facility."</i></p> <p>The Navy has not explained why the other three facilities, listed in the Final Work Plan, were not used to recycle the waste material from Site 20. The ROD states that the selected remedy includes "Offsite asphalt batching of excavated media, or disposal in offsite (sic) landfill if asphalt batching is not available in the State of Connecticut at the time of excavation." Since asphalt batching was available in the State of Connecticut, and the waste material from Site 20 was suitable for asphalt batching based on waste characterization, and there were apparently no permitting constraints that prohibited asphalt batching, the waste material should not have been disposed in a landfill. EPA remains concerned that the intent of the ROD has been violated and believes that a ROD amendment is required.</p>
4	<p>The ROD summary is still incomplete and incorrect. The interpretation that landfill disposal could be selected over asphalt batching based on its lower cost contradicts the ROD. The volume of waste material that required disposal was exactly the volume specified in the ROD, and for that specified volume the ROD indicated a clear preference for asphalt batching. Had the waste volume been significantly different from that specified in the ROD, the Navy may have had a legitimate reason for using the alternative disposal method. Please revise this section.</p>
12	<p>The comment requested that two notes be added to the figure (if the storm drains were not added to indicate a discharge location near TB5). Neither the report text nor Figure 7 provides rationale for sample location TB5. Please add the second note to Figure 7 to provide that rationale.</p>