



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

June 21, 2004

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

Re: Responses to EPA's April 26, 2004 Comments on the Final Basewide Groundwater Operable Unit Remedial Investigation Update/Feasibility Study

Dear Mr. Evans:

EPA reviewed the *Navy Responses to EPA's April 26, 2004 Comments on the Final Basewide Groundwater Operable Unit Remedial Investigation Update/Feasibility Study NSB-NLON, Groton CT*. The numbering system used in the Navy response is retained. Detailed comments are provided in Attachment A.

I look forward to working with you and the Connecticut Department of Environmental Protection to selecting a remedy for the groundwater resources in the northern portion of the base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kymberlee Keckler".

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT
Melissa Griffin, NSBNL, Groton, CT
David Peterson, USEPA, Boston, MA
Chau Vu, USEPA, Boston, MA
Jennifer Stump, Gannett Fleming, Harrisburg, PA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
3. p. ES-29, ¶1	Delete the CT Endangered Species Act listing instead of changing its status to "Not Applicable."
7. Table 4-3	EPA's comment indicated RCRA transportation standards are not ARARs. The Navy response agrees. The Navy response indicates 40 C.F.R. parts 261-265 and 268 will be removed from the table. The Navy response states, "The standards of 40 CFR ___ are incorporated by reference" will be added to the State of Connecticut portion of the table. Will this be 40 C.F.R. Parts 261, 262, 263, 264, 265 and 268?
13. p. 6-21, ¶3	<p>The Navy response appears to indicate that groundwater monitoring is covered under Alternative GW-2 and is not part of Alternative S-2. The Navy response states "there is no monitoring associated with Alternative S-2." This statement is contrary to page 6-20 of the FS which states, "periodic monitoring [would be] conducted on an as-needed basis to document degradation and residual contamination." Soil monitoring activities would appear to be part of Alternative S-2. Page 6-20 also states construction workers will wear appropriate PPE if subsurface activities are conducted. The Navy response states, "In the event that the Navy elects to conduct subsurface activities in this area, the applicable Federal and state standards would be identified for the additional activities to be taken." It is not clear from the Navy response whether the compliance with ARAR and TBC text on page 6-21 will be revised to be more consistent with text on page 6-20.</p> <p>If waste is left in place it needs to be monitored as required under both federal RCRA and State remediation standards. Also, any cap (whether natural or man-made) needs to meet the State remediation regulation standards.</p>