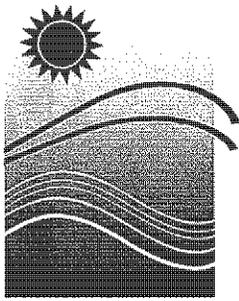


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LETTER AND COMMENTS FROM CONNECTICUT DEPARTMENT OF ENERGY AND
ENVIRONMENTAL PROTECTION REGARDING DRAFT THIRD FIVE YEAR REVIEW
REPORT NSB NEW LONDON CT (PUBLIC DOCUMENT)

09/26/2011

CONNECTICUT DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION



Connecticut Department of

**ENERGY &
ENVIRONMENTAL
PROTECTION**

**BUREAU OF WATER PROTECTION AND LAND REUSE
REMEDIATION DIVISION**

September 26, 2011

Via U.S. Mail and e-mail

Mr. Dominic O'Connor
Remedial Project Manager
Environmental Restoration
Naval Facilities Engineering Command Mid-Atlantic
Bldg. Z-144
9742 Maryland Avenue
Norfolk, VA 23511-3095

RE: Review of Draft Third Five Year Review Report

Dear Mr. O'Connor:

The Remediation Division of the Bureau of Water Protection and Land Reuse of the Connecticut Department of Energy and Environmental Protection (DEEP) has received and reviewed the draft report entitled "Third Five- Year Review Report for CERCLA Sites at Naval Submarine Base- New London, Groton, Connecticut" dated August 2011. TetraTech NUS, Inc. prepared the document on behalf of the Navy. The report documents the results of the third Five- Year Review conducted by the Navy at the Naval Submarine base New London NPL site pursuant to the requirements of CERCLA.

General Comments

DEEP concurs with the overall conclusions of the report, and agrees that the remedies that have been put in place remain protective of human health and the environment. However, DEEP is concerned that several deficiencies and/ or serious operation and maintenance issues were identified. Most of these pose a potential future threat to the effectiveness of a particular remedy, but do not appear to pose an immediate threat. However, the above ground storage tank that was found to have been installed at the Goss Cove Landfill may have damaged the cap at that site. DEEP acknowledges that the Navy is working to assess the resulting damage, and is confident that the Navy will make any needed repairs.

However, these issues suggest that the institutional controls presently in place at the site need to be strengthened to prevent these issues from reoccurring, and prevent other

problems from occurring in the future. DEEP recommends that the Navy, EPA, and DEEP work together to find ways to strengthen the existing institutional controls.

Specific Comments

1. Page 1-14 Table 1-1 Site Summary

Please add a column to this table listing the operable unit or units associated with each site. A separate table might convey this information more clearly.

2. Table 2-9 Comparison of Monitoring Criteria

Please clarify the meaning of the black shading in some cells. This comment also applies to Tables 4-6 and 6-8.

3. Page 2-29 Section 2.6.1 Area A Landfill- Assessment

The first bullet point (Early Indicators of Potential Remedy Failure) notes that equipment was improperly stored in no-load areas of the cap and some heavy items were stored in other areas, possibly exceeding the 500 pounds per square foot weight limit. However, boats were also found to be stored on the cap without blocking to prevent point-load damage to the asphalt. As with the improper storage of boats without blocks on the DRMO cap, this can be prevented by putting in place more robust controls to ensure that materials stored on the cap do not damage the cap, and no materials are stored in no-load zones. This indicates the need for more vigorous enforcement of existing land use controls, as well as the need to evaluate whether additional measures also need to be taken beyond existing LUCs.

4. Page 3-10 Section 3.3.1.1 Area A Downstream Watercourses- Remedy Selection

In the last sentence of the last bullet point, please specify that the deed restrictions recorded in the event of a transfer would conform to state law.

5. Page 3-17 Section 3.3.3.2 Groundwater Monitoring Program

Please correct the typo in the first sentence- 201 should be 2011.

6. Page 4-16 Section 4.5.4 DRMO- Site Inspection

DEEP feels that the storage of boats on the cap without blocking should be listed as a deficiency. This is because of the potential for the resulting point load to damage asphalt, and possibly damage the landfill cap. Identifying this issue as a deficiency rather than an O & M issue underscores the need to address this issue in a timely manner.

7. Page 4-18 Section 4.6 DRMO- Assessment

The second bullet point (Early Indicators of Potential Remedy Failure) notes that deficiencies were observed during O&M inspections. Most of these deficiencies were items such as cracks in the pavement which can be expected to occur and which can be easily repaired. However, boats were also found to be stored on the cap without blocking to prevent point- load damage to the asphalt. As with the improper storage of materials on the Area A Landfill cap, this can be prevented by putting in place more robust controls to ensure that boats and other materials stored on the cap do not damage the cap. This indicates the need for more vigorous enforcement of existing land use controls, as well as the need to evaluate whether additional measures also need to be taken beyond existing LUCs.

8. Page 6-21 Section 6.6 Goss Cove Landfill- Assessment

In the first bullet point (Question 1), please clarify that the site owner, Mr. Remo Fusconi, hired the contractor that injected potassium permanganate at the Fusconi Cleaners site. DEEP did not carry out this work, although DEEP did issue a temporary authorization allowing Mr. Fusconi to carry out this work.

9. Page 6-22 Section 6.6 Goss Cove Landfill- Assessment

The second bullet point on this page (Early Indicators of Potential Remedy Failure) discusses the discovery of an AST that was installed adjacent to the museum without proper approvals from the base environmental department. DEEP is confident that the Navy will take proper steps to assess and remedy any damage to the cap resulting from this tank. However, this incident indicates need for more vigorous enforcement of existing land use controls, as well as the need to evaluate whether additional measures also need to be taken beyond existing LUCs. Such additional measures might include more frequent and recurrent training for appropriate personnel, more frequent inspections, changes to the internal permitting system for excavation and construction, additional signage, etc.

10. Page 7-5 Section 7.4 Site 9- Former OT-5-Progress Since Last Review

The text recommends that a land use control remedial design (LUCs RD) be prepared for this site, and that a no further action proposed plan and record of decision also be prepared. DEEP concurs with this recommendation for this site, as well as other sites. DEEP understands that the Navy intends to prepare LUCs RDs for all sites where land use controls are in place but LUCs RDs have not been prepared. DEEP feels that proposed plans and records of decision for these sites would meet the requirements of the Federal Facilities Agreement and create a clear public record.

11. Page 10-6 Section 10.2- Lower Subbase Building 79 Former Waste Oil Pit and Pier 1

The first sentence of the fourth paragraph states that TPH was detected in Zone 4 soil "at concentrations that exceed CTDEP RSRs, which indicates a potential for migration to groundwater". Please clarify that the TPH concentrations exceeded the pollutant mobility criteria.

12. Page 13-6 Section 13.5.4 Site 21- Lower Base- Berth 16

An excavation was observed within Zone 7, and the soil associated with this excavation was not being managed properly to prevent the spread of contamination. As with deficiencies noted at other sites, this indicates the need for more vigorous enforcement of existing land use controls, as well as the need to evaluate whether additional measures also need to be taken beyond existing LUCs.

13. Page 14-1 Section 14.2 Site 22- Lower Subbase- Pier 33

The first sentence refers to 800 feet of property in the vicinity of various landmarks in the Lower Base. Please clarify that this refers to 800 lineal feet of property along the water front, rather than 800 square feet of property.

14. Page 15-1 Section 15.0 Site 23- Former Fuel Farm

The text notes that no CERCLA decision documents were prepared for soil at the Former Fuel Farm. DEEP recommends that a no further action proposed plan and record of decision be prepared for soil at this site.

15. Page 15-4 Section 15.2 Former Fuel Farm- Background- Storm Drainage System

The text states that the drainage system in the fuel farm "served approximately one-third of the entire facility". Please clarify whether this refers to one-third of the entire base or one-third of the Former Fuel Farm.

16. Table 18-2 Deficiencies Identified During the Third Five Year Review

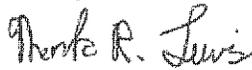
The storage of boat racks on pavement without wooden blocks at the DRMO should also be included in this table.

17. References

Please correct the typo in the CTDEP,1999b reference. "Fosconi Drycleaners" should be "Fusconi Drycleaners".

Please contact me at (860) 424-3768 or via e-mail at mark.lewis@ct.gov if you have any questions.

Sincerely,



Mark R. Lewis
Environmental Analyst 3
Remediation Division
Bureau of Water Protection and Land Reuse

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Mr. Michael Brown, Naval Submarine Base New London, Environmental Department,
Building 439, Room 105, Box 39, Route 12, Groton, CT 06349

Mr. Corey E. Rich, P.E., Tetra Tech NUS, Inc., 661 Anderson Dr., Pittsburg, PA 15220-
2745