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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

September 1, 1994

Mark Evans, RPM
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

RE: EPA's Additional Technical Comments on the Focused Feasibility Studies for Area "A" Landfill and OBDA/Area "A" Downstream at the Naval Submarine Base-New London, Groton, Connecticut

Dear Mr. Evans:

The purpose of this letter is to transmit my additional technical comments, as was promised in my May 27, 1994 letter, on the subject documents.

If you have any questions regarding these comments, you should feel free to call me at (617) 573-5736.

Sincerely,

Christine Williams, RPM
Federal Facilities Superfund Section

Attachment

cc. Mark Lewis, CT DEP
Andy Stockpole, NLNSB
Kymberlee Keckler, EPA
Rona Gregory, EPA
Mary Sanderson, EPA
Patti Tyler, EPA
Dan Winograd, EPA
Dale Weiss, TRC

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COMMENTS ON FOCUSED FEASIBILITY STUDIES FOR
AREA A LANDFILL,
AREA A DOWNSTREAM/OBDA SITE,
NEW LONDON NAVAL SUB BASE
GROTON, CT

1. General Comments Applicable to both Sites

There are several EPA comments on the August 1991 risk assessment which were not addressed in the August 1992 risk assessment, and which will be addressed in the Phase II RI report.

- EPA has not yet reviewed the Navy's proposed background levels of inorganics in soils. Therefore, the cleanup levels for inorganics cannot be evaluated in this document. However, since there is a document which details the development of background inorganic concentrations in soils, this report needs to be referenced in the FFS.

The next 2 bullets must be presented in the FFS in order to provide the background necessary for the remedy selection, even though the Navy is planning to address these issues in the Phase II RI report.

- The FFS must present information on the zonal approach used to evaluate site risks to support the Navy's proposed cleanup goals. The FFS needs to provide a list of specific contaminants of concern that were evaluated for each site.

- The FFS must provide chemical-specific toxicity values, exposure parameters, risk indices, and hazard quotients to verify the risk assessment and to indicate which contaminants are "driving" risk.

- The future-use scenarios evaluated by the Navy assume that the base will continue with current operations. While this assumption is reasonable given the fact that the base is not on the base closure list at this time, residential risk scenarios must still be evaluated for a frame of reference.

2. General Comments Applicable to the Area A Landfill

The Navy indicated in this FFS that they intend for the selected soils/waste (source control) operable unit interim remedy to be satisfactory as a final remedy. However, there is insufficient information about the Area A Landfill to support **design** of an

interim landfill cap. The measures described in this FFS appear to be sufficient for implementing interim measures, or non-time critical removal actions, but do not sufficiently address the entire soils/waste operable unit.

- The thickness of waste in the landfill appears to exceed the maximum depth of investigation (16 feet), and no geophysical studies were performed to determine the approximate volume of waste at the landfill.

- The ground water table at this site ranges from 5 to 10 feet deep; therefore much of the waste material is saturated and the benefits of a cap or cover will be somewhat limited without additional hydraulic controls.

- The FFS indicates that the Navy plans to conduct various base support operations on top of the cap. The proposed cap is a mosaic design that relies on a geocomposite (clay sandwich) low permeability membrane overlain by crushed stone and possibly a bituminous surface. The effect of continued operations on top of the proposed landfill needs to be fully evaluated. Use of the landfill surface by heavy equipment can promote differential settlement and add to liner fatigue/failure. Materials other than crushed stone must be considered for the bedding and top layers over the drainage layer to protect the functional components of the cap.

- The cap design section makes no mention of landfill gases and presents no plans to manage gas migration. A design which includes placement of a 6-acre low-permeability cap over a landfill of undefined composition should discuss the need for gas management.

- The FFS discusses plans to install a ground water interception trench to prevent ground water in the overburden from contacting the landfill contents. There is not sufficient data to determine the type of system which would provide the proper control, although some type of hydraulic controls do appear to be warranted. No ground water gradient maps, flow calculations, or ground water modeling was presented to support the feasibility of the proposed trench. The presence of approximately 10 feet of saturated land filled materials suggests a very steep ground water gradient would need to be created, and a trench would need to virtually encircle the landfill to be effective.

- The range of remedies advanced for full consideration in the FFS for hot spots is inadequate to allow for

remedy selection flexibility. The high-cost incineration treatment alternative cannot be appropriately evaluated because no other alternatives featuring treatment as a central element are presented.

- It is not clear why the Navy is considering RCRA landfilling of incinerated soils under the off-site incineration option, since the amount of PCBs remaining in the soils is expected to be in the low ppb range.

- The technology screening and process option selection sections of the FFS do not follow RI/FS guidance. The first screening typically performed is to screen technology types, and simultaneously screen process options within technology types. This is typically followed by a process option evaluation, which serves to select one process option to represent each technology type that survived the first screening. The FFS (table 3-8) eliminated whole technology types without selecting any representative process options, and in one instance selected two process options from one technology. In addition, the FFS screened out all disposal options, then proceeded to formulate an off-site RCRA landfill alternative.

- The Navy should clarify why the FFS only targets hot spots to a depth of 10 feet.

- The information regarding nature and extent of contamination has not been used to develop contamination isopleth site representations that are necessary to understand the contaminant horizontal and vertical distribution. The information on nature and extent, fate and transport, and exposure pathways leading to human and environmental receptors has not been integrated into a conceptual site physical and/or exposure model. Both types of conceptual site models are needed to establish remedial action objectives. The FFS should include nature and extent graphics, a physical, and a conceptual site model, and the FS objectives should include addressing all potential exposures indicated.

- Certain contaminants present in the site soils (VOCs PAHS, Pb, pesticides, inorganics other than Pb that are present an order of magnitude over background) have not been included in the cleanup goals established under remedial action objectives. If these contaminants are present in hot spots subject to remediation, then these contaminants should be considered in remedies to assure the hot spots are properly managed. If they are not collocated, then the adequacy of hot spot determination

and the cleanup goals (target remediation level) selected appear high, when compared to the levels selected at other NPL sites, as documented in RODs.

- The FFS alternatives costs appear incomplete and are likely underestimated.

- The purpose of preparing a FFS is to reduce known site risks as soon as possible. However, during alternative evaluations, cost consideration is given to multiple waste area remediation for on-site technologies. No consideration is given to the need to store materials in temporary units until the overall coordinated waste treatment efforts, nor are the schedule impacts of this variation considered.

3. General Comments Applicable to the Area A Downstream/OBDA

Cleanup goals established under remedial action objectives do not include certain leachable metals (arsenic, cadmium, chromium), or PAHs, including known carcinogens, found in site soils. If EPA determines these metals require consideration, the technologies and alternatives that address DDTR are not likely to also address the PAH compounds and the leachable metals.

The information regarding nature and extent of contamination, fate and transport, and exposure pathways leading to human and environmental receptors has not been integrated into a conceptual site model. The conceptual site model is useful in establishing remedial action objectives. EPA recommends a conceptual model be developed for the site, and that the FFS objectives include addressing all potential exposures indicated. Data substantiating the lack of evidence of contamination and or absence of any significant exposure should be presented prior to arriving at the conclusion that only remediation for DDTR in soils is appropriate.

Area A Landfill FFS Page Specific Comments

4. Page 1, ¶4 The FFS needs to further define soils/landfill contents, since the FFS does not address potentially impacted soils below 10-feet.

5. Page 5, ¶2 The focusing of the FFS makes sense for a removal action, but may cut short some of the considerations needed to achieve a ROD for an LOU.

6. Page 5, ¶4 The FFS attempts to disconnect ground water contamination from soil contamination, and to attempt to remediate soils first, then address other issues, such as ground water, later. For

this to occur, intermedia transfer of contaminants from soil to ground water and contaminant transport to environmental receptors must be factored into the soil remediation scheme with regards to hot spot remediation.

7. Page 5, ¶5 — The presence of wetlands adjacent to the landfill and possibly beneath the landfill suggests a potential load bearing issue which should be discussed. Efforts to minimize additional wetlands infringement should be discussed in the FFS.

8. Page 6, ¶1 — The statements suggest certain areas of the landfill are not to be addressed in the Operating Unit. This is difficult to assess, since no supporting data regarding extent of fill are presented in the FFS.

9. Page 6, ¶2 — The statements regarding wastes suggest little is known about the specifics of materials placed in the landfill. The extent of hot spot investigation is also not discussed for areas other than the bituminous pad. In lieu of such information, it appears that a Subtitle C cap design would bre more protective.

10. Page 38 — The grain size percentages total less than 100 percent. This information needs to be corrected to achieve a figure of 100 percent grain size distribution.

11. Page39,¶6 — The Navy must present the results of the dioxin and furan analyses and show the application of the TEF. Note that TEFs are intended to adjust toxicity factors, and are not the actual detected concentrations.

12. Page40,¶2 — The statement, "...inorganics do not appear to be of concern at this site." needs to be justified. The receptors of the leachate from this landfill are the ecological ones in the wetlands. The Navy appears to be arbitrarily deleting inorganics from further consideration, when the sediment contaminants at the toe may be above screening values.

13. Page 43 — A preliminary review of data presented in Tables 2-10 through 2-13 indicates the presence of elevated concentrations of carcinogenic PAHs, pesticides, and inorganics in addition to PCBs. Many of these reported concentrations exceed RCRA

corrective action levels for soil indicating that they may be of concern at this site. In addition, although the potential for children to be exposed to site surface soil contaminants is noted in Appendix D, the stated remedial action objectives are intended to reduce exposure of workers to PCBs. It is not clear based on the information presented whether or not these objectives would also be protective of children.

The risk assessment information presented here and in Appendix D is comprised solely of summary conclusions and provides no back up information to justify the conclusions. Because of the lack of information presented in the FFS and because a risk assessment for the site which incorporates previous EPA comments has not been presented for review, it is not possible to confirm the appropriateness of the stated risk-based remedial action objectives.

It should also be noted that the Navy has not addressed the potential for soil contaminants to leach and result in unacceptable ground water concentrations.

14. Page 43, ¶2,3 — The FFS limits evaluates only PCBs as COCs, in spite of the presence of elevated levels of inorganics, VOCs, and SVOCs including PAHs, and Pesticides. The basis for this limitation needs to be provided.

15. Page44,¶6 — It is not appropriate to use an absorption factor for ingestion of 0.3 because the oral slope factor for PCBs used to estimate risks already incorporates the impacts of absorption via ingestion.

16. Page44,¶7 — The proposed target level of 50 ppm is too high and is not justified based on the scenario described in the previous paragraph, assuming the absorption factor for ingestion is eliminated from the equation. The Navy must develop a target level which is protective of future excavation workers. Construction of the cap may expose workers to soils during excavation and during the possible installation of extraction wells.

17. Page 45, ¶5,6 — Insufficient justification for eliminating a number of contaminants from the COC list is provided. The text must discuss the extent to which hot spot investigations were completed and

provide adequate interpretation.

18. Page45,¶8 — No mention is made of gas migration objectives or leachate objectives. These areas of concern are typically addressed in landfill remedies and must be addressed prior to construction of a cap at Area A.

19. Page 53, ¶4 — The basis for determining volumes of contaminated soils does not appear to be conservative. The analytical results of sample # 2LTB28 indicate an elevated level of PCBs and should be included in any hotspot removal.

20. Page 56 — Vitrification does not appear on table 3-6, but does appear in subsequent discussions. Sediment removal technologies should not appear on this table, but should be included on a list of technologies that would be evaluated for sediment removal in the wetland, should that become necessary based on the additional sampling to be completed.

21. Page 58 — Aerobic degradation is retained despite a stated technical feasibility concerns that it may not degrade PCBs, which are the only COC. Overall, Table 3-7 does not follow the NCP and RI/FS guidance and eliminates or retains technologies for reasons other than technical feasibility.

Table 3-7 includes additional technologies not listed on Table 3-6. This discrepancy must be corrected.

22. Page 60 — The Navy's assertion that wastes going to an on-site solid-waste landfill must be solid (cannot contain PCBs or RCRA hazardous waste) is incorrect. All hazardous wastes must first be solid wastes according to the RCRA definition. More importantly, there are no regulations that limit the placement of any PCBs in soils in solid-waste landfills. Soils containing concentration of PCBs in excess of 50 ppm in soils must go to a chemical waste landfill. Soils containing PCB concentrations below 50 ppm are generally regulated by the State, particularly regarding what levels of PCBs in soils can go to a Subtitle D landfill. Indeed, the remedy for this site's landfill is to leave soils with up to 10 ppm in place.

Table 3-7 should list the contaminants present in the hot spot soils that may require pretreatment to meet LDRs.

23. Page 62, ¶7 — The evaluation of process options was reportedly completed without regard to the specific waste site. Per Page 4-16 of the RI/FS guidance, this evaluation must be site specific and consider site wastes and volumes, setting, etc.

24. Page 63, ¶1 — Despite the statements made here, the process option screening presented in the FFS and Table 3-8 does not follow the RI/FS guidance. The first screening typically performed is to screen technology types, and simultaneously screen process options within technology types that have not been eliminated. This is typically followed by process option evaluation, which serves to select one process option to represent each technology type that survived the first screening. The FFS (Table 3-8) eliminates whole technology types without selecting any representative process options, and in one instance select two process options from one technology. In addition, the FFS screens out all disposal options, then proceeds to formulate and advance for full evaluation an off site RCRA landfill alternative.

25. Page 64 — Five technologies on this page are screened out entirely, contrary to guidance.

26. Page 65 — Two thermal technology process options are advanced, rather than one representative one. All disposal technologies are screened out, even though one is used in alternatives.

27. Page 66, ¶4 — The FFS appears to have been prepared only to serve as a briefing document for NSB-NLON. This is inconsistent with the RI/FS process. I recommend you remove the third sentence.

28. Page 67 — Table 4-1 indicates stabilization is a part of the incineration on-site option. This is not the case in the alternative description. A RCRA landfill alternative appears in spite of the elimination of this technology during screening.

29. Page 71, ¶6 — Concerns regarding NSB-NLON operations are not appropriate for the FFS implementability discussions, and should be deleted. This focus of the FFS should be on the implementability of the technology for scientific reasons, not Sub base

preferences.

30. Page 76, ¶3	The end product of incineration of soils is treated soils, not ash. The decision to dispose of treated soils in a RCRA landfill is costly and conservative. This material, based on data in the FFS is likely to be of superior quality to materials being proposed to be left in place at the site. If returned to the site and replaced at Area A, disposal costs and a large part of backfill costs could be avoided. However, consideration must be given to RCRA land-ban requirements.
31. Page 83, ¶4	Note that the thermal desorption on-site afterburner is unlikely to match Alternative 4-9's required treatment levels of incineration.
32. Page 88, ¶1	A very limited range of alternatives with only one treatment alternative is presented in Section 5.0. The treatment alternative also relies on containment to a significant degree.
33. Page 89, ¶2	Given the heavy emphasis on treatment in Section 4, it would be logical to have more than one alternative featuring treatment present in this detailed evaluation.
34. Page 98, ¶1	Plans to install a ground water interception trench to reroute ground water in the overburden to prevent it from contacting landfill contents/soils are discussed. Evidence is presented in the FFS supporting the viability of such an approach. The presence of approximately 10 feet of saturated landfilled materials suggests a very steep ground water gradient would need to be created, and the trench would need to virtually encircle the landfill to reduce contact significantly. The trench would, without ground water pumping separate from the trench, be unlikely to achieve waste dewatering and would capture waste leachate as well.
35. Page 98, ¶1,2	This and preceding discussions are quite vague regarding details. The potential for cap failure when loaded with heavy equipment should be discussed. Landfill gas management should be discussed. How will cap integrity be monitored, and how easy will it be to repair under a working surface? The landfill will now generate a significant amount of runoff from storm events. How will this runoff be conveyed off the liner and

managed and where discharged? How will the mosaic design complicate water management?

36. Page 99 — The cap design detailed here is different from the text and appears to not include a drainage layer above the liner. This needs to be reconsidered, as liner drainage is a critical element in the proposed shallow cover design.

37. Page 100 — Connecticut Subtitle D landfill closure regulations, interpreting the federal criteria, must be considered in closure of this landfill. This and other cap comments apply to all subsequent alternatives, since all include the same cap design.

38. Page 106 — It would seem prudent to include some backfill costs as additional fill for contouring for drainage will likely be necessary. No costs are included for the ground water trench discussed on Page 98, and are absent from all subsequent cost tables.

39. Page 107, ¶1 — The FFS fails to provide a reason at this point to not sample the base of the excavation to determine if cleanup goals are met.

40. Page 126, ¶3 — A key element is compliance with state regulations regarding closure of Subtitle D landfills, which is not discussed in this FFS.

41. Page 129, ¶5 — The incinerator market has, for the last year, been depressed because of an overcapacity problem. It is unlikely that capacity will present any difficulties to implementation of incineration. The text should be corrected.

42. Page 130, last — The incineration option relies on treatment as a principal element, a key factor in the evaluation criteria. The costs presented in the FFS are likely inaccurately high, and capacity is available in the marketplace.

Area A Downstream/OBDA FFS Page-Specific Comments

43. Page 1, ¶3 — The OBDA is improperly referenced as the Over Bank Discharge Area. For consistency, this should be changed to Over Bank Disposal Area.

44. Page 6, Figure 1-4

The text references the OBDA as abutting the northwest end of the Area A Wetland and Landfill. For clarity, these areas should be labeled on Figure 1-4. In addition, the boundaries of the OBDA should be added, references to sampling locations 2WMW6S and 2WMW6D should be deleted, and the symbol used for the fence line should be added to the legend.

45. Page 7, ¶2

Assuming that the north arrow shown on Figure 1-4 is correctly positioned, the text in this paragraph should be corrected as follows:

The primary discharge point from the Area A Wetland is through four, 24-inch corrugated metal culverts located along the western dike. This discharge forms a small stream which flows in a northwesterly direction for approximately 200 feet into Upper Pond. Under normal flow conditions, Upper Pond discharges to a small stream which flows in a northwesterly direction toward Triton Avenue. The stream continues in a northwesterly direction passing under Triton Avenue and Shark Boulevard to its discharge point along the Thames River (DRMO Outfall).

Upper Pond also has a discharge structure on its southern shoreline. Under high water conditions, flow from Upper Pond will discharge to a drainage channel feeding Lower Pond, which also receives inflow from the surficial aquifer. Flow from Lower Pond is conveyed through a man-made drainage system around North Lake, under Shark Boulevard and through the golf course to an outfall along the Thames River.

46. Page 40, ¶1

Please provide the analytical results for the dioxins and furans analysis and show the application of the toxicity equivalent factor which resulted in a value of 0.0109 ppb. The information provided does not allow the reviewer to confirm the Navy's conclusions that dioxin is not a chemical of concern at this site. Please see the comments regarding Area A Landfill, page 39, ¶6.

47. Page 72, ¶4

The Navy must address the potential for soil contaminants to leach and result in unacceptable ground water concentrations. This assessment should consider all soil contaminants regardless of whether or not they are also detected in ground water at concentrations which exceed ARARs.

48. Page 73, Section 4.2.1.1

The text should discuss when the Navy assessed or will assess the potential for site soil and sediment contaminants to migrate to North Lake via surface runoff, snow melt, flooding, etc., which could result in surface water contaminant concentrations which pose unacceptable health risks to users of North Lake.

49. Page 73, ¶4

For clarity, the last sentence in this paragraph should be rewritten as follows:

> Remedial action objectives and associated target levels developed for children coming into direct contact with DDTR-contaminated soils will ensure that all human-health based risks are reduced to acceptable levels (i.e., reduced to below 1×10^{-6}).

50. Page 74, ¶6

Although results of on-site ecological investigations were inconclusive relative to the establishment of ecologically based criteria for the protection of mammalian and wildlife species, a considerable volume of literature is available relative to adverse biological impacts (and bioaccumulation characteristics) associated with DDTR in soils and sediments. At a minimum, applicable literature estimates should be presented and compared with the suggested human-health target level for DDTR of 29 mg/kg.

51. Page 75, ¶2

There is no technical basis presented to support the statement that the human health target level for DDTR of 29 mg/kg "should be protective of most wildlife." In the absence of site-specific data, literature estimates regarding the ecological risks of DDTR in soils should be presented as a basis of comparison.

52. Page 75, ¶3, Bullet 1

This bullet states that "some sediments at this site are toxic due to factors other than the presence of DDTR." The uncertainty associated with causes of this toxicity suggests that it may be premature to establish final target levels for the protection of soil and sediment at this time. Further, additional field investigation is warranted, particularly along stream channels not targeted for DDTR remediation. This section of the report should clearly indicate that the inability to identify specific cleanup objectives which are protective of the environment may require that additional cleanup actions for soils or sediments be developed in the future when

additional data and information are available (i.e., that the interim actions may, in fact, not represent the final actions required for soils and sediments in this area).

53. Page 81, ¶1

Although there are no chemical-specific cleanup values for soils and sediments, ambient water quality criteria (AWQC) for the protection of freshwater wildlife are available and should be considered for use in wetlands, ponds and along drainage ditches and/or stream channels. One potential methodology currently being used in other jurisdictions to evaluate acceptable soil contaminant levels to meet AWQC is equilibrium partitioning. This technique allows for back-calculating an allowable soil concentration based on an allowable ambient water quality based pore water concentration. Cleanup levels developed for soils using this technique typically incorporate a correction factor of 100 (i.e., New York State soil cleanup criteria). AWQC have been identified as an ARAR at this site (Table 4-1).

Although site specific factors would need to be evaluated, consideration of AWQC would suggest a lower target RAO (most likely in the range of 2 - 3 mg/kg). This would be consistent with proposed RCRA corrective action levels for DDT, DDE and DDD.
The fourth sentence in this paragraph should read "Since this number is applicable to products for consumption, it is <u>not</u> applicable to DDTR in sediments; ....."

54. Page 83, ¶3

Second sentence should read "Areas to be remediated are defined as areas where concentrations of DDTR <u>exceed</u> the target RAO...."

55. Page 83, ¶4

Review of Plate 1 indicates that DDTR concentrations at location 2DSS6 exceed the targeted RAO of 29 ppm based on laboratory and field screening results (i.e., levels of 66.0 and 60.3 ppm are reported). This area appears to be omitted from areas shown in Figure 4-1 to be above the target remediation levels. Based on the information presented, this area should be remediated for the protection of human health, or justification for its omission should be included in the text. In addition, given that this sampling location is situated along the existing security fence, additional samples should be obtained along the western side of the fence to

ensure that access to all potentially contaminated areas is restricted. Additional sampling is also warranted to determine the horizontal limits of this hot spot, this sampling should be included in the additional sampling to occur during next spring.

56. Page 110, ¶2

Sentence five should read "Introduction of DDTR into the food chain through vegetative uptake is expected to be negligible and therefore ....."

If upward vertical gradients exist between ground water and surface waters (as previously noted for Lower Pond), the long term effectiveness of this option may be reduced through upward migration of contaminants. The likelihood of this potential mode of failure should be addressed in this section relative to the selection of a 6-inch soil cover.

57. Page 110, ¶8

As indicated for Alternative 2D-6, In-situ Stabilization, long term monitoring would also be required for this alternative and should be discussed.

Note that Alternative 2D-6 was eliminated from consideration because it did not meet remediation goals. If in-situ stabilization followed by capping cannot meet remediation goals, then this alternative (capping alone) should also be eliminated. This inconsistency should be discussed.

58. Page 114, ¶2

At the bottom of this paragraph, reference is made to constituent concentrations in water ranging from 15 to 45 ppm, but no constituent is identified. This must be corrected.

59. Page 116, ¶6

In-situ stabilization is cast as not meeting remediation objectives because contaminants themselves remain unaltered and there would be no reduction in toxicity. As a result, this alternative is eliminated from further consideration. Based on this reasoning, the capping option (Alternative 2D-3) should also be eliminated. If both options meet remediation goals, in-situ stabilization could potentially be eliminated based on cost and/or difficulties associated with implementation in a wetland environment. Use of stabilizing agents could have a long term adverse impact on wetlands hydrology.

60. Page 121, Figure 5-8	Treatment for wastewater generated during dewatering operations should be included in this figure.
61. Page 136, Figure 6-1	The existing security fence line should be added to this figure for completeness.
62. Page 137, Figure 6-2	Excavation Limits, listed in the legend should be deleted; no excavation is proposed for this alternative.
63. Page 140, Bullet 3	The following statement should be added: "OSHA standards will be applicable to on-site workers."
64. Page 148, Bullet 10	The word "not" should be deleted from the second sentence. NPDES discharge standards are applicable to this alternative.
65. Page 165, ¶2	Based on the information presented, it is unclear which alternative will have the greatest long-term impact on the wetlands. Further support should be provided for the statement regarding the cover alternative, or it should be modified accordingly.