



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

November 4, 1994

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: Action Memorandum for the Defense Reutilization and Marketing Office and the Spent Acid Storage & Disposal Area

Dear Mr. Evans:

I am writing in response to your request for EPA to review the Action Memorandum for the Defense Reutilization and Marketing Office and the Spent Acid Storage & Disposal Area. EPA reviewed this document in light of EPA's Action Memorandum guidance and its consistency with the plans and specifications and found that the Action Memorandum includes the appropriate information required by the EPA guidance document. A few detailed questions and comments are listed on Attachment A.

In EPA's comment letter on the Focused Feasibility Study for the DRMO Yard, we requested a plan for disposing the VOC contaminated soils that are being excavated. EPA remains concerned that the proposed process options for treatment may not address VOCs.

As you know, the administrative record should be available for public review within 60 days of initiation of on-site activities. I look forward to reviewing the index of the Administrative Record once it becomes available. Please do not hesitate to contact me at (617) 573-5777 should you have any questions or wish to arrange a meeting.

Sincerely,


Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

cc: Mark Lewis, CT DEP, Hartford, CT
Andy Stackpole, NSBNL, New London, CT
Dan Winograd, USEPA, Boston, MA
Mary Sanderson, USEPA, Boston, MA
Patti Tyler, USEPA, Boston, MA
Dale Weiss, TRC, Lowell, MA



ATTACHMENT A

<u>Page</u>	<u>Comment</u>
Page 5, ¶1	<p>VOCs have been identified in DRMO hot spot soils at relatively high concentrations. The report should explain why these compounds are not included as COCs.</p> <p>The Focused Feasibility Study ("FFS") for the DRMO indicated that utilities are buried 4 to 6 feet below grade. This implies that soils are accessible at depths greater than the three foot range specified by the Navy. All soils in the "hot spots" should be excavated until contaminant levels are either less than or equal to the final target clean-up standards, or ground water is encountered.</p>
Page 9, ¶2	<p>Although the text states that "target cleanup levels were established" for the COCs, these levels have not been approved by EPA, and cannot be considered final clean-up standards. The text should be revised to accurately reflect the status of the standards.</p>
Page 20, ¶2, 1st Bullet	<p>VOC concentrations of 35 to 96 ppm are not generally considered to be "relatively low" as stated in the text. These concentrations may represent health hazards during excavation activities, and may have the potential to act as an ongoing source of ground water contamination.</p> <p>The discussion in the text should state why the soils containing elevated VOCs, especially TCE (i.e., near 6TB16) are being considered for excavation when page 74, paragraph 6 of the FFS stated that "excavation and ... disposal of VOC or TCE contaminated soils has not been retained for further evaluation. The potential process options for TCE impacted soils are not compatible with process options retained for PCB, PAH, and lead-impacted soils." The text must clarify this apparent contradiction.</p>
Page 25, ¶1	<p>All detected contaminants which pose a risk to human health or the environment above NCP target risk levels, or which exceed ARARS, TBC values, or background concentrations should be addressed in this section. For example, VOCs and metals (in addition to lead) were reported in DRMO soils at concentrations exceeding either background concentrations or TBC values.</p>