



**STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



**BUREAU OF WATER MANAGEMENT  
PERMITTING, ENFORCEMENT & REMEDIATION DIVISION  
FEDERAL REMEDIATION PROGRAM**

April 26, 1999

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

Re: State Comments Regarding Draft Proposed Plan for **Site 8**- Goss Cove Landfill,  
Naval Submarine Base New London, Groton, Connecticut

Dear Mr. Evans:

The Department has received and reviewed the draft Proposed Plan for the Goss Cove Landfill at the Naval Submarine Base New London in Groton. The Proposed Plan was received by the Department on April 1, 1999.

The preferred alternative being presented by the Navy in the Proposed Plan consists of the following elements:

- 1) Containment: Engineered Control Cap
- 2) Institutional Controls that would protect the integrity of the engineered control
- 3) Long- term monitoring to evaluate the effectiveness of the engineered control
- 4) Five year reviews

The Navy has stated previously that the cap will meet the  $10^{-6}$  cm/s permeability requirement of the remediation standard regulations. The State supports the proposed alternative.

Specific Comments

Page 1- The Cleanup Proposal

The second bullet point should state that institutional controls would ensure that the site is not used in a manner which would disturb the engineered control (cap) or the polluted soil.

The third bullet point should state that the purpose of long term monitoring is to evaluate the effectiveness of the engineered control.

Maintenance of the engineered control, as required by Section 22a-133k-2(f)(2)(B) of the Remediation Standard Regulations, should be included as a separate bullet point.

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*Goss Cove Landfill Draft Proposed Plan- State Comments*

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Page 1- What Do You Think, last ¶

This section states that the public hearing will be held on August 9. The box in the next column states that the public meeting will be held on July 14. The State understands that the date for the public hearing and meeting has not been finalized. However, the proper dates should be stated in both of these locations.

Page 2- Figure 2

Please include a north arrow on this map.

Page 2- History, ¶1

In the last sentence, please delete the word "former". Although the landfill is no longer in use, the waste remains in place.

Page 2 Summary of Alternatives

The "Components" column of the table in the lower right corner of page 2 does not distinguish clearly between Alternative 2A and Alternative 2B. The table should explain clearly that alternative 2A would involve placement of a soil cap, while Alternative 2B would involve construction of a multi-layer impermeable cap. The components of Alternatives 2A and 2B should be explained in separate boxes.

In the third bullet point in this column, please correct the typo: "... multi- 0layered cap..".

Page 3 The Navy's Proposed Remedy

This second paragraph of this section is confusing and leaves the impression that only the paved portions of the landfill will be capped with a multi-layer impermeable cap. The text should clearly explain that the basic components of the engineered control, including the geonet gas layer, the geomembrane layer, the drainage layer, and the lower geotextile layer, will overlay the entire landfill. The difference between the grass portions of the landfill and the portions which will be paved is in the components above the drainage layer.

The third paragraph should be re-written to state that institutional controls would ensure that the engineered control is not disturbed. Maintenance of the cap is a separate issue from institutional controls, but should also be mentioned.

*Goss Cove Landfill Draft Proposed Plan- State Comments*

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In the fourth paragraph, the first sentence should state that the purpose of groundwater monitoring is to evaluate the effectiveness of the engineered control. Please delete the second sentence, and replace it with the following: "If the results of the groundwater sampling indicate that the engineered control is not effective in limiting the migration of pollutants to the groundwater, the scope of monitoring will be expanded to include the sampling and analysis of surface water and sediment in the Thames River, and Goss Cove. Other options may also be considered."

In the diagram on page 3, both cross sections should use the same scale. Please use the same graphical symbol (same intensity of lines, pattern, etc.) to delineate waste on both cross sections. Figure 3 should also state "Not to Scale".

If you have any questions regarding this letter, please contact me at (860) 424-3768.

Sincerely,



Mark R. Lewis  
Senior Environmental Analyst  
Federal Remediation Program  
Permitting, Enforcement & Remediation Division  
Bureau of Water Management

cc: Kymberlee Keckler, US EPA New England, Federal Facilities Section  
Andy Stackpole, NSBNL Environmental Department  
Jack Looney, CT Attorney General's Office  
Matthew Bartman, Tetra Tech NUS, Inc.