



**STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



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

September 8, 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 *Record of Decision for Site 8- Goss Cove Landfill, Soil, Sediment, and Surface Water, Naval Submarine Base New London, Groton, Connecticut*

Dear Mr. Evans:

The State has received and reviewed the draft *Record of Decision for Site 8- Goss Cove Landfill, Soil, Sediment, and Surface Water, Naval Submarine Base New London, Groton, Connecticut*. The document was dated July 1999 and was received by the Department on July 30, 1999.

The State has previously expressed support for the proposed remedy as described in the Proposed Plan dated June 1999. The State continues to support the proposed remedy as described in the draft Record of Decision. In general the draft Record of Decision adequately documents the proposed remedy. However, some revisions are necessary. These revisions are discussed in detail in the Specific Comments section. In addition, several typographical and spelling/ grammatical errors were noted. Our suggestions for changing these are also noted below. All references to "CGS" mean the Connecticut General Statutes, while all references to RCSA mean the Regulations of Connecticut State Agencies.

**Specific Comments**

**Title Page**

Please delete "Surface Water" from the title page as this remedy does not address surface water.

**Page iv Acronyms and Abbreviations**

PCE stands for tetrachloroethene rather than tetrachloroethane. The Navy may wish to note that this chemical is also known as perchloroethene.

**Page vi Glossary**

**Incremental Cancer Risk-** Please revise this definition to note that the  $10^5$  carcinogenic risk level

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applies to the cumulative carcinogenic risk posed by multiple contaminants. The State's acceptable carcinogenic risk for individual pollutants is  $10^{-6}$ .

Page 1-2 Section 1.4 Description of the Selected Remedy

This section does not discuss the geonet gas layer or the geomembrane layer components of the cap system, although these components are shown in Figure 2.4. Please include a discussion of these critical components.

Page 2-1 Section 2.1 Site Name, Location, and Description

Please correct the grammatical error in the last sentence of the fourth paragraph. The submarine museum, rather than the US Navy, is open to the public.

Page 2-3 Figure 2-1 Location Map

Please provide a more legible copy of this figure.

Page 2-6 Section 2.2.2 Enforcement Action

Please clarify in the first sentence that CERCLA was passed in 1980 while SARA was passed in 1986.

In the second paragraph, the Federal Facilities Agreement is not a US EPA document. It is an interagency document signed by EPA, the Navy, and DEP. The FFA was signed by the three agencies in October and November 1994, rather than January 1995. Please revise the text.

Page 2-9 Section 2.2.2 Enforcement Activities

In the fourth line ULVA should be Ulva.

Page 2-11 Section 2.3 Highlights of Community Participation

In the second paragraph, please include the full name of the local paper: *The New London Day*.

In the discussion regarding Technical Assistance Grants, please include a sentence stating that currently no TAG funds have been awarded. In the third paragraph, please include the date of the public meeting: June 23, 1999.

Page 2-13 Section 2.5.4 Hydrogeology

Please revise the language regarding the GA groundwater classification to more fully reflect the language on page 27 of the Department's Water Quality Standards Document (Ground Water Quality Standards Effective April 12, 1996). The GA classification applies to ground water in the area of existing private water supply or an area with the potential to provide water to public or private water supply wells. GA ground water is presumed, at a minimum, to be suitable for drinking or other domestic uses without treatment.

Please revise the language regarding GB ground water. Groundwaters of this class are presumed to be degraded due to a variety of pollution sources. This classification applies to ground water within a historically highly urbanized area or area of intense industrial activity and where public water service is available. GB groundwater may not be suitable for direct human consumption without treatment due to waste discharges, spills, or leaks of chemicals or land use impacts.

Pages 2-18 and 2-20 Section 2.8 Selected Remedy

The discussion regarding the components of the cap is somewhat confusing. It implies that there are separate caps for the paved areas and the grass areas. It would be less confusing to state that the entire landfill will be capped with a geonet gas layer, a geomembrane layer, and a drainage layer. The text can then discuss the differences between the paved areas and the grass areas.

Page 2-20 Section 2.8 Selected Remedy

In the third paragraph, what is the "NSB-NLON instruction"? Is this the base master plan? The purpose of the environmental land use restriction is to ensure that the parcel will not be used in a manner that could disturb the engineered control or the polluted soil. Please revise the text.

Page 2-22 Section 2.9 Analysis of Selected Remedy

Overall Protection of Human Health and the Environment

The first paragraph states that deed restrictions and environmental land use restrictions will be used to prevent future residential land use. While this may be appropriate, for an engineered control to be approved, the Department requires an environmental land use restriction to ensure that the parcel will not be used in a manner that could disturb the engineered control or the polluted soil.

Compliance With ARARs and TBCs

The reference in the second sentence should be to RCSA §22a-133k-2(f)(2)(B). This section is a description of the requirements for use of an engineered control, rather than a definition. The reference to Section 22a-133k-2(A)(iv) is correct. Please note that the Navy will be responsible for complying with the specific requirements of this section, including public participation and public notice requirements.

Page 2-23 Section 2.9 Analysis of Selected Remedy

Short Term Effectiveness

The first paragraph states that the remedy will meet remedial action objectives within six months. Is this within six months of the start of construction, or within six months of completion of construction? Please clarify.

Page 2-26 Statutory Determinations

The first sentence of the fourth paragraph should read “....the selected remedy will result in hazardous substances remaining on site....”.

Page 3-1 Section 3.1 Overview

In the second paragraph, should “NSB-NLON instruction” be “the base master plan”?

Page R-1 References

The reference to CTDEP, 1999, should read as follows: CTDEP, 1999. Fusconi Dry Cleaners, Groton, Connecticut, CERCLIS # CT0018668426, Connecticut Phase I/II Environmental Site Assessment. Connecticut Department of Environmental Protection, Bureau of Water Management, Hartford, Connecticut, March 1999.

The reference to FFA, 1995 should be FFA, 1994. Please delete “US Environmental Protection Agency” from this reference as the FFA is an interagency document signed by the Navy and DEP as well as EPA.

Table C-3 Action Specific ARARs

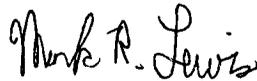
Please include the statutes regarding Dredging and Erection of Structures and Placement of Fill

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in Tidal, Coastal, or Navigable Waters (CGS §22a-359 to 363) as the Navy agreed to do in letters dated January 6, 1998 and May 20, 1999. Please include the entire citation for the State's Air Pollution Control Regulations: RCSA §§22a-174-1 to 29. The Navy agreed in its May 20, 1999 letter to make this change.

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  
Darlene Ward, NSBNL Environmental Department  
Matthew Bartman, Tetra Tech NUS, Inc.