



**STATE OF CONNECTICUT**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**



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

April 17, 1998

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: Request for Approval of Calculated CTDEP Remediation Standards  
Lower Subbase Remedial Investigation  
Naval Submarine Base New London, Groton, Connecticut

Dear Mr. Evans:

The Department has reviewed Brown & Root Environmental's letter dated March 20, 1998. Brown & Root's letter responded to my letter dated February 27, 1998. My February 27 letter requested additional information regarding the Navy's request for approval of calculated soil criteria for additional polluting substances for the planned Lower Base Remedial Investigation at the Naval Submarine Base New London in Groton, Connecticut. Brown & Root Environmental submitted the original request on behalf of the Navy on December 23, 1997.

The majority of the Navy's responses are acceptable to the State. However, in four cases (bromochloromethane- Comment 3, cobalt- Comment 8, dimethylphthalate- Comment 10, and bis(2-chloroethoxy)methane- Comment 11), the Navy has agreed to make the changes I requested in my February 27 letter. However, the Navy states that these changes would have no effect on the risk assessment because the pollutant in question was not present in soil and/ or ground water. It is unclear why the Navy is requesting approval of criteria for substances which have not been detected on the site, and are therefore not part of the release. Based on the statements made in your March 20 submittal, the Department will be taking no further action on your request for approval of criteria for these four pollutants. I would also like to caution the Navy about submitting in the future requests for approval of criteria for pollutants which are not present on a site as part of a release. We consider such requests to be an inappropriate use of both State and federal resources.

Our detailed comments are listed below. The comment numbers correspond to those used by Brown & Root in their March 20, 1998 letter.

**Specific Comments**

Comments 1, 2, 4, 5, 6, 7, 9

The Navy's responses are acceptable to the State.

**Lower Base Request for Additional Criteria- Response to 3/20/98 Brown & Root Letter**

**April 17, 1998**

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Comment 3- bromochloromethane

The Navy states that this compound was not detected in soil or ground water. As stated above, since the substance is not present, the Department will be taking no further action on your request.

Comment 8- cobalt

The Navy states that this metal was not detected in soil. As stated above, since the substance is not present, the Department will be taking no further action on your request.

Comment 10- dimethylphthalate

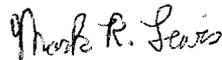
The Navy states that this compound was not detected in soil or ground water. As stated above, since the substance is not present, the Department will be taking no further action on your request.

Comment 11- bis(2-chloroethoxy)methane

The Navy states that this compound was not detected in soil or ground water. As stated above, since the substance is not present, the Department will be taking no further action on your request.

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  
Jeff Sullivan, NSBNL Environmental Department  
Corey Rich, P. E., Brown and Root Environmental  
Gary Ginsberg, Dept. of Public Health