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STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

July 26, 1994

Mr. Mark Evans, RPM
NORTHNAVFACENGCOM, Code 1823/DM
10 Industrial Way
Mail Stop 82
Lester, PA 19113-2090

Re: Draft Focused Feasibility Study, Spent Acid Storage and Disposal Area

Dear Mr. Evans:

Staff of the Permitting, Enforcement and Remediation Division (PERD) of the Connecticut Department of Environmental Protection (CTDEP) have reviewed the report entitled "Draft Focused Feasibility Study, Spent Acid Storage and Disposal Area", dated March 29, 1994. The report was prepared by Atlantic Environmental Services, Inc. (Atlantic) on behalf of North Division Naval Facilities Engineering Command (NORTHDIV). Listed below are the additional staff comments promised in the CTDEP preliminary comment letter dated May 31, 1994:

General Comments

Pursuant to CERCLA and the National Contingency Plan, the Navy is not required to obtain permits for on-site work. The Navy, however, is responsible for submitting information for Departmental review to ensure identification of and compliance with State standards, requirements, criteria, or limitations that would otherwise be included in a permit and is obligated to comply with the substantive requirements for those items. The Focused Feasibility Study (FFS) must include provisions for identifying activities that would normally require CTDEP approval or permits, and list the appropriate information that would be submitted to ensure compliance with the substantive requirements of CTDEP regulations. These activities include, but are not limited to the following:

1. Transportation and disposal of hazardous waste;
2. On-site treatment of hazardous waste;
3. On-site re-use of treated hazardous waste;
4. Activities in or near coastal area management zones;
5. Air emissions emanating from a treatment unit;
6. Any discharge to the waters of the State of Connecticut;
7. Clean-up criterion and goals of soils and ground water.

While CTDEP staff found the selected interim remedial action consisting of the removal and off-site disposal of all contaminated soil in an off-site licensed hazardous waste facility, combined with subsequent repaving at the Spent Acid and Disposal Area to be reasonable, several concerns were identified. These are as follows:

1. It is our understanding that the Navy wants to avoid post closure land restrictions, care or monitoring at this area. This will require the remediation of contaminated soil beyond the Resource Conservation and Recovery Act (RCRA) hazardous waste levels proposed, to 0.015 ppm for lead as measured by TCLP. It would also require that consideration be given to the ground water issue at this site.

2. The Navy intends the preferred alternative to be a final remedial action for contaminated soil. Therefore it is incumbent upon them to ensure that all Applicable, Relevant, and Appropriate Requirements (ARARs) and To-Be-Considered (TBC) values of the CTDEP are complied with.

3. The proposed preferred alternative only partially addresses source removal. It does not address the potential impacts of remaining saturated wastes on ground water quality wetlands, and surface water quality of the tributary streams and the Thames River.

4. CTDEP is concerned that contaminants remaining under the area to be repaved may continue to leach into the ground water due to seasonal and any tidally induced fluctuations in the water table at this site.

5. There also is the possibility of contaminated ground water following preferential flow pathways to the Thames River. Since ground water contamination at this site has not been fully characterized, it is understood that further remedial action are likely to be warranted. Please provide a response to address these concerns and the potential for future removal of contaminated soils (other than those proposed) from this site.

Specific Comments

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As reported in both the FFS and the most recent Technical Review Committee (TRC) meeting, there is a ground water investigation pending. Please indicate to us whether the schedule found on page 90 of the Field Sampling portion of the Phase II Remedial Investigation (RI),(Atlantic- May, 1993) is still valid and/or provide an updated schedule for the completion of the additional work in the Phase II RI work plan e.g., (the installation of further groundwater monitoring wells and any studies of the groundwater at this site.)

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A mass-based target level of 500 ppm for the remediation of soils contaminated with lead at the Spent Acid Storage and Disposal Area was proposed by the Navy. CTDEP currently allows, as a comparison to the Toxicity Characteristic Leaching Procedure (TCLP), a mass-based analysis divided by a factor of 20, which in this instance would produce a proposed target clean up level of 25 ppm. This is unacceptable to CTDEP. It conflicts with the following:

1. The TBC value of 15 ppb (TCLP) or it's corresponding mass-based number 0.3 ppm for lead.

2. The Drinking Water Standard (DWS) Maximum Contaminant Level (MCL) of 0.05 ppm or the corresponding mass based-number of 1.0 ppm for lead.

   Note: this MCL is incorporated by reference in the State of Connecticut Water Quality Standards (WQS) as adopted January, 1992 as an appropriate lead clean up level for areas with a ground water classification of either GA or GB/GA.

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The FFS states that arsenic, cadmium, and chrome were present in soils above TBC levels. Please indicate the analytical test result concentrations, the TBC value used to make this determination, and what measures will be taken to remediate these contaminants.

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The 5.0 ppm EPA standard, listed as a target remediation level for lead contaminated soils is a hazardous waste characterization level, and is unacceptable for clean closure of this site. The 0.05 ppm CTDEP ARAR value and the TBC value of 0.015 ppm utilized by CTDEP are appropriate for the remediation at this site. The TBC value is preferred by CTDEP because it addresses the protection of ground water at this site, and when combined with ground water remediation, it will meet both the CTDEP's and the Navy's goal of clean closure for this site.

If you have any questions in regard to these comments please do not hesitate to contact me at (203) 566-5486.

Sincerely,

Mark Leone

Mark Leone
Environmental Analyst
Bureau of Water Management
Permitting,Enforcement, & Remediation Division

MRL: mrl

cc: Barry Giroux, Atlantic Environmental Services, Inc.
Christine Williams, EPA Region 1