



**STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



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

March 21, 1997

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 The Draft Proposed Plan for Site 15- Spent Acid Storage and Disposal Area, Naval Submarine Base New London, Groton, Connecticut

Dear Mr. Evans:

The Department has received your letter of transmittal dated March 6, 1997, with the accompanying Draft Proposed Plan for the Spent Acid Storage and Disposal Area. We received these materials on March 10, 1997.

The preferred alternative proposed in this document is No Further Remedial Action. As I have indicated in our recent phone conversations, the Department is concerned that this alternative does not address lead contaminated soil which remains in place at the site. This soil contains lead at concentrations which exceed the Pollutant Mobility Criterion of the Department's Remediation Standard Regulations. The Department does not feel it is appropriate for the Navy to proceed with issuing a proposed plan until this important issue has been resolved. You indicated that the Navy would be willing to delay issuance of the Proposed Plan to allow us further time to resolve this issue. We are pleased that the Navy is willing to do so, and would like to know how long the Navy would be willing to delay issuing the proposed plan.

There are a number of ways in which the Navy may address the remaining lead contaminated soil and demonstrate compliance with the Remediation Standard Regulations. We would like to discuss these options as soon as possible under the Informal Dispute Resolution procedures described in Section 13.2 of the Federal Facilities Agreement.

Listed below are our specific comments and concerns regarding the Draft Proposed Plan.

Spent Acid Storage and Disposal Area Draft Proposed Plan

State of Connecticut Comments

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Specific Comments

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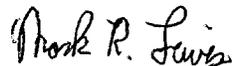
A public hearing is scheduled for April 10, 1997. As I have indicated above, we do not feel it is appropriate to issue the proposed plan and to hold public hearings and a public comment period until the issue of the remaining lead contaminated soil has been resolved. The dates for the public hearing, and for the public comment period, should be delayed until our concerns can be resolved.

Page 5 Column 2 The Navy's Preferred Alternative

This section states that EPA concurs with the preferred alternative, but does not mention DEP's position. We do not feel it is appropriate to omit a statement of DEP's position on this issue from this or any proposed plan.

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