



**STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



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

August 20, 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 *Feasibility Study Site 20- Area A Weapons Center Naval Submarine Base- New London, Groton, Connecticut*

Dear Mr. Evans:

The Department has received and reviewed the Draft *Feasibility Study Site 20- Area A Weapons Center Naval Submarine Base- New London, Groton, Connecticut*. The plan was dated June 1999, and was received by the Department on June 24, 1999. The report was prepared for the Navy by EA Engineering, Science, and Technology. All references in this document to CGS mean the Connecticut General Statutes, while all references to RCSA mean the Regulations of Connecticut State Agencies.

General Comments

The Feasibility Study adequately considers the various options for addressing the contamination at The Area A Weapons Center. The remedial options which were retained include Alternative 1- No Action, Alternative 2- Land Use Restriction, and Alternative 3- Selective Excavation and Offsite Disposal. If Alternative 3 is selected, it may not be possible to completely remove all contaminated soil due to the presence of buildings or other structures within Site 20. If this is the case, then appropriate land use restrictions will also be necessary.

The Feasibility Study is printed in single sided format. It is the policy of both EPA and the State that reports and other deliverables should be printed in double sided format to conserve paper and filing space. In the future, please submit all reports in double sided format.

Specific Comments

1. Page ES-1 Executive Summary Section ES.1 Scope

The last sentence of the second paragraph states that the FS report "satisfies the requirements of the State of Connecticut Department of Environmental Protection remediation Standard Regulations".

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Please delete this sentence. The FS simply outlines various options for addressing contamination detected at the Area A Weapons Center. The FS does not by itself satisfy the requirements of the regulations.

2. Page 1-8 Section 1.3.4 Surface Water Features

Please clarify the second sentence of the first paragraph, which discusses the origin of the Thames. The sentence should read: "The Thames River originates in the harbor in the City of Norwich...."

3. Page 1-9 Section 1.3.4 Surface Water Features

The last sentence in the second paragraph states that no surface water classification has been assigned to surface water within Site 20 or the Area A wetland. When no surface water classification has been specifically assigned to a body of water, the classification is, by default, A. This means the water is known or presumed to meet water quality criteria which support designated uses. Designated uses include potential drinking water supply, fish and wildlife habitat, recreational use, agricultural, industrial supply, and other legitimate uses. Please revise this paragraph.

4. Page 1-16 Section 1.6.1 Exposure Assessment

The second paragraph states that it was assumed that future residents could come into contact with all soil to a depth of 10 feet. Please note that the direct exposure criteria of the Remediation Standard regulations apply to all soils to a depth of 15 feet. However, under the regulations, soils at a depth greater than 4 feet or soils more than two feet below a paved surface comprised of a minimum of three inches of bituminous concrete or concrete are considered "inaccessible soil". The direct exposure criteria do not apply to inaccessible soil provided that an environmental land use restriction is in effect. The environmental land use restriction must ensure that the soil will not be exposed as a result of excavation, demolition, or other activities and that any pavement which is necessary to render the soil inaccessible is maintained in good condition. The assumption that future residents could come into contact with soil to a depth of 15 feet appears to be sufficiently conservative.

5. Page 2-1 Section 2.2 Applicable or Relevant and Appropriate Requirements

The last sentence of the second paragraph states that a selected action must comply with "promulgated state laws... if the state ARAR is more stringent than the federal ARAR". Please revise this sentence to indicate that a selected action must also comply with adopted State regulations".

6. Page 2-4 Section 2.2.5.1 Chemical Specific Applicable or Relevant and Appropriate Requirements

This section lists "Human health risk calculations for soil and sediment" as an ARAR. Please delete this reference since such calculations are neither a law nor a regulation.

7. Page 2-5 Section 2.2.5.1 Chemical Specific Applicable or Relevant and Appropriate Requirements

CTDEP Remediation Standards for Soil

The first paragraph paraphrases Section 22a-133k-2(e)(A) of the regulations. That section of the Regulations discusses statistical approaches to determining compliance with the direct exposure criteria. The text omits two key portions (i and ii) of subsection A. The omitted sections specify that “(i) a representative sampling program consisting of not less than twenty samples of soil located above the water table has been used to characterize the distribution and concentration of such substance at the subject release area or remaining at the subject release area following remediation, (ii) the release area has not been remediated by means of excavation and removal of polluted soil.” Please revise the text accordingly. The text should also discuss subsection (B), which applies if less than twenty samples have been collected and the release area has not been remediated by means of excavation and removal of polluted soil, and subsection (C), which applies if the subject release area has been remediated by means of excavation.

The first sentence in the second paragraph uses the acronym “PMC” without defining it as the Pollutant Mobility Criteria. Please revise. The third sentence of this paragraph refers to “mass sediment analyses”. Please note that the Remediation Standard Regulations apply only to soil. The Regulations specifically exclude sediment from the definition of “soil”. This paragraph misstates the requirements of RCSEA §22a-133k-2(c)(2)(D), which concerns polluted soils in a GB area. This paragraph must be substantially revised, or preferably, deleted. The paragraph states that for contaminants other than inorganics and PCBs, the results of mass analysis are compared to the pollutant mobility criteria listed in Appendix B of the regulations. The paragraph also says that the results of TCLP or SPLP analysis are compared to the ground water protection criteria multiplied by 10. Actually, for all substances, the pollutant mobility criteria in Appendix B may be compared directly to analytical results from the appropriate EPA method. For substances other than inorganics or PCBs, the results of mass analysis are compared directly to the pollutant mobility criteria listed in Appendix B. For inorganics and PCBs, TCLP or SPLP analysis must be used instead of mass analysis. Section 22a-133k-2(c)(2)(D) of the Regulations specifies that in a GB area for substances other than total petroleum hydrocarbons, the results of a TCLP or SPLP analysis *may* be compared to the ground water protection criterion multiplied by 10, or by another site specific dilution factor. This option is only available if no non- aqueous phase liquids are present, as determined in accordance with the Regulations.

The second to last sentence of the second paragraph says that where no non- aqueous phase liquid is present and the background concentration of a substance in groundwater is less than the ground water protection criterion, the results of a TCLP or SPLP analysis may be compared to the ground water protection criteria multiplied by a calculated site specific dilution factor. Actually, the only restriction in Section 22a-133k-2(c)(2)(D) of the regulations is that non- aqueous phase liquids may not be present. This section does not specify that the background concentration of a substance must

be less than the groundwater protection criteria. This restriction applies to all of section D of the regulations. In other words, if the Navy does not want to directly use the pollutant mobility criteria specified in Appendix B, it may compare the results of TCLP or SPLP analysis to the ground water protection criteria multiplied by 10 or another appropriate dilution or dilution and attenuation factor. In order to do so, the Navy must demonstrate, in accordance with the Regulations, that non aqueous phase liquids are present.

The last two sentences of the third paragraph discuss the exemption from the pollutant mobility criteria which is provided for "isolated soil". Please use the full term "environmentally isolated soil". Please also use the full definition for environmentally isolated soil, as specified in RCESA §22a-133k-1(a)(15). This paragraph also discusses statistical approaches to determining compliance with the pollutant mobility criteria. The approaches cited may be used only if the release area has not been remediated by means of excavation and removal of polluted soil. If the release area is remediated through excavation and removal of polluted soil, then the results of all laboratory analyses of samples from the subject release area must be equal to or less than the pollutant mobility criteria.

8. Page 2-5 Section 2.2.5.1 Chemical Specific Applicable or Relevant and Appropriate Requirements

Human Health Risk Calculations for Soil and Sediment

Please correct the last sentence. The correct reference is to the EPA Region III Risk- Based Concentration Tables, rather than Region II.

9. Page 2-6 Section 2.2.5.1 Chemical Specific Applicable or Relevant and Appropriate Requirements

Please correct the typo at the end of the second sentence, first paragraph. "CFS" should be "CSF". The paragraph discusses the 10E-6 to 10E-4 lifetime incremental cancer risk range considered acceptable by EPA. It should also discuss the lifetime incremental cancer risk considered acceptable by the State. The Remediation Standard Regulations are based on an incremental cancer risk of 1E-6 for individual chemicals, and an incremental risk of 1E-5 for the cumulative effect of multiple chemicals.

10. Page 2-6 Section 2.2.5.2 Location Specific Applicable or Relevant and Appropriate Requirements

Please include the Coastal Management Act (CGS §§22a-90 to 112) as an Applicable requirement here and in Table 2-2.

11. Page 2-7 Section 2.2.5.3 Action Specific Applicable or Relevant and Appropriate Requirements

A number of additional state laws and regulations should be cited here and in Table 2-3. These include the State's Hazardous Waste Management Regulations (RCSA §22a-449(c)100 to 110), the State's Water Discharge Permitting Regulations (RCSA §22a-430-1 to 8), Water Pollution Control Statutes (CGS §22a-430, 22a-430b), Water Pollution Control Regulations (RCSA §22a-430-1 to 8), Inland Wetland Regulations (RCSA §§22a-39-1 to 15), Air Pollution Control Regulations (RCSA §§22a-174-1 to 29), Control of Noise Regulations (RCSA 22a-69-1 to 7.4), Well Drilling Regulations (RCSA §§25-128-33 to 64), Well Drilling Statutes (CGS §25-126 to 25-131), and the Connecticut Council on Soil and Water Conservation Guidelines for Soil Erosion and Sediment Control. A complete list of ARARs is attached to this letter.

The third bullet point should discuss more completely the Connecticut Water Quality Standards. The Standards were adopted in accordance with CGS §22a-426. The Surface Water Quality standards became effective on May 15, 1992 while the Ground Water Quality standards became effective on April 12, 1996.

12. Page 2-9 Section 2.2.5.3 Action Specific Applicable or Relevant and Appropriate Requirements

The discussion regarding the Inland Wetlands and Watercourses Act states that the Subbase "is exempt from the Wetlands and Watercourses Act within the Town of Groton, with exemption in the Town of Ledyard requiring approval. This statement is incorrect and must be revised. Under CERCLA, the Inland Wetlands and Watercourses Act is an ARAR. As such the work at site 20 must comply with the substantive requirements of the Inland Wetlands and Watercourses Act. The Navy is not required to comply with administrative and procedural requirements.

13. Page 2-9 Section 2.2.5.4 Other Guidance to be Considered

The Federal Clean Air Act is listed here as "To Be Considered". The Federal Clean Air Act, and the corresponding state regulations and statutes are Action Specific, Applicable Requirements. As such they should be listed in Section 2.2.5.3, rather than here.

14. Page 2-13 Section 2.4.1 Development of Preliminary Remediation Goals

The third paragraph discusses the criteria used in human health risk assessment. It states that the incremental cancer risk level of 1E-5 was used in screening potential cancer risks to develop preliminary remedial goals. It notes that 1E-5 is the State's threshold level. Please note that under the Remediation Standard Regulations, the acceptable incremental cancer risk due to individual chemicals is 1E-6. The 1E-5 risk level applies to the cumulative risk posed by multiple chemicals.

15. Page 2-14 Section 2.4.1 Development of Preliminary Remediation Goals

Connecticut Preliminary Remediation Goals

The fourth paragraph states that "shallow soil is defined as less than 4 ft below ground surface". Please clarify that this definition is made by the Navy. The regulations do not distinguish between shallow soil and deeper soil. The direct exposure criteria apply to soil within 15 feet of the surface. However, the regulations specify that soil below a depth of 4 feet is considered "inaccessible". The direct exposure criteria do not apply to inaccessible soil, providing that an environmental land use restriction is in effect to ensure that the soil will not be exposed as a result of excavation, demolition, or other activities. Therefore, four feet of clean fill are required above any soil with contamination which exceeds the direct exposure criteria.

16. Page 2-15 Section 2.4.2 Accommodations of Preliminary Remediation Goals and Applicable or Relevant and Appropriate Requirements

The second paragraph states that in certain cases "technical limitations and costs may prevent the development of alternatives that comply with all ARAR and PRG. As an example, it states that in areas which pose relatively low risk, capping may be combined with institutional controls. The cited example is not relevant to the situation. Capping and institutional controls are often selected as a remedy, but selection of these options does not mean that any ARARs have been waived. If a selected remedy does not comply with Federal or state ARARs, then the Navy must obtain a specific waiver of those ARARs.

The third paragraph states that total excavation and disposal will not be considered because site 20 is surrounded by extensive wetlands and has a shallow ground water table, and excavation would involve greater risk to the environment than other options. This is not a valid reason for rejecting total excavation. The Navy is about to begin extensive excavation of pesticide contaminated sediments and soil in the nearby Area A Downstream Watercourses (Site 3). As part of the remedy, the excavated area will be restored and improved. A more legitimate reason for not considering total excavation within the Area A Weapons Center is that total excavation would interfere with ongoing operations and would require that existing buildings be removed.

17. Page 2-16 Section 2.5 Area of Attainment

The report states because an environmental land use restriction to prevent residential use of the property will be put into place, remedial alternatives will address contaminants above the water table. Please note that the direct exposure criteria apply to all soils to a depth of 15 feet, whether those soils are above or below the water table. The regulations provide that the pollutant mobility criteria do not apply to soils below the seasonal low water table in a GA area, or above the seasonal high water table in a GB area.

18. Table 2-1 Summary of Chemical Specific Applicable or Relevant and Appropriate Requirements

The table states that the direct exposure and pollutant mobility criteria will be used to develop preliminary remediation goals for soils less than two feet below paved surfaces or less than 4 feet below unpaved surfaces. This approach does not consider the requirements of the pollutant mobility criteria. The Regulations provide an exemption from the pollutant mobility criteria for "environmentally isolated soils". Environmentally isolated soils are defined in part as soils which are "beneath an existing building or beneath another existing and permanent structure which the Commissioner has determined in writing would prevent the migration of pollution". The Department does not recognize soil which is beneath pavement as meeting the definition of "environmentally isolated soil". The pollutant mobility criteria still apply to all soils beneath pavement and above the seasonal high water table.

19. Table 2-2 Summary of Location Specific Applicable or Relevant and Appropriate Requirements

This table should include statutory or regulatory citations of the listed laws and regulations.

Please add the location specific ARARs in the attached table to Table 2-2.

20. Table 2-3 Summary of Action Specific Applicable or Relevant and Appropriate Requirements

This table should include statutory or regulatory citations of the listed laws and regulations.

Please add the action specific ARARs in the attached table to Table 2-3.

This table lists the State's Air Pollution Control Regulations as requirements To Be Considered. Please change the status of our regulations to Applicable. The Air Pollution Control Regulations would apply to any remedial option which would produce air emissions.

It is unclear why the State's Hazardous Waste Management Regulations are listed twice in this table.

For the Connecticut Inland Wetlands and Watercourses Act, please specify more clearly how "on-site treatment of soil will meet these requirements". If another remedial alternative is selected, will it meet the requirements of the act also? The Action to be Taken to Meet ARAR column should specify that any selected remedial action will comply with the substantive requirements of the act.

21. Table 2-5 Connecticut Preliminary Remediation Goals for Soil

Please ensure that this table properly lists the units for the pollutant mobility criteria for all contaminants. The pollutant mobility criteria for volatile and semi-volatile organic compounds, and pesticides are for a solid matrix and are expressed in mg/kg. The pollutant mobility criteria for inorganics and PCBs are for a TCLP or SPLP leachate extract and are expressed in mg/l. This table

does not list pollutant mobility criteria for any of the metals. Appendix B to the Remediation Standard Regulations lists pollutant mobility criteria for many metals. They should be included in this table. The Navy must propose and receive approval for pollutant mobility and/ or direct exposure criteria for any metals or other pollutants which are part of the release but for which criteria are not listed in the Regulations.

Some of the criteria listed in the table are incorrect. They are not the criteria listed in the Appendices to the Remediation Standard Regulations or the list of Approved Criteria for Additional Polluting Substances which was released by the Department on April 30, 1999. The incorrectly listed criteria are listed in the table below, together with the correct criteria.

Parameter	Residential DEC Listed by Navy (mg/kg)	Residential DEC	Industrial Commercial DEC Listed by Navy	Industrial/ Commercial DEC	GB Pollutant Mobility Criteria Listed by Navy	GB Pollutant Mobility Criteria
2-methyl naphthalene	1,000	474	2,500	2,500	56	98
benzo(g,h,i)perylene	1,000	1,000	2,500	2,500	56	42
benzoic acid	0	1,000	0	2,500	0	1,000
carbazole	31	31	290	290	0.36	1
chrysene	84	84	780	780	0.96	1
indeno(1,2,3-cd)pyrene	0.84	1	7.8	7.8	0.017	1
phenanthrene	1,000	1,000	2,500	2,500	56	40
4,4'-DDD	2.6	2.6	24	24	0.029	**
4,4'-DDE	1.6	1.8	17	17	0.21	**
4,4'-DDT	1.6	1.8	17	17	0.21	**
endrin	20	20	610	610	0*	*
endrin aldehyde	20	20	610	610	0*	*
cobalt	1,000	**	2,500	**	*	*
manganese	1,600	*	47,000	*	*	*

* = Navy must calculate and seek approval for criteria.

** = Navy must submit calculated criteria for approval.

Please refer to Sections 22a-133k-2(b)(4) and 22a-133k-2(c)(5) of the regulations for information that must accompany a request for approval of criteria for additional polluting substances in soil.

22. Page 4-5 Section 4.3.2.1 Land Use Restriction

The text states that if the base is transferred to a non- Federal owner, then a deed restriction would be put into place. Please specify here that an environmental land use restriction in the form

prescribed by the regulations would be recorded.

23. Table 4-2 Summary of Comparative Analysis of Remedial Alternatives

Reduction of Toxicity, Mobility, and Volume Through Treatment

For alternative 3, in the "degree to which treatment is irreversible" row, replace "Selective excavation would be irreversible" with "No treatment included"

24. References

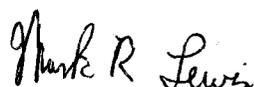
Please cite the most recent version of the State's water Quality Standards. The Surface water Quality Standards became effective May 15, 1992, while the Ground Water Quality Standards became effective April 12, 1996.

25. Appendix B-3 Alternative 3: Selective Excavation

Please check the total costs for each line item. Several of the extended costs listed are not equal to the unit cost multiplied by the quantity.

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
Charles McLeod, EA Science, Engineering and Technology
Jack Looney, CT Attorney General's Office



STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



List of State Applicable or Relevant and Appropriate Requirements For Area A Weapons Center (Site 20) Feasibility Study Naval Submarine Base New London

Action Specific ARARs			
Requirement	Citation	Status	Synopsis of Requirement
Remediation Standard Regulations	RCSA §22a-133k 1- to 3	Applicable	These regulations were adopted on January 30, 1996, under the statutory authority provided by CGS §22a-133k. They provide specific numeric cleanup criteria for a wide variety of contaminants in soil, ground water, surface water and soil vapor.
Hazardous Waste Management: Generator & Handler Requirements- General Standards, Listing & Identification	RCSA §§22a-449(c)100-101	Relevant and Appropriate (Applicable to Investigation Derived Waste)	These sections establish standards for listing and identification of hazardous waste. The standards of 40 CFR §§260-261 are incorporated by reference. Chromium is not exempted from listing as a hazardous waste.
Hazardous Waste Management: Generator Standards	RCSA §22a-449(c)102	Relevant and Appropriate (Applicable to Investigation Derived Waste)	This section establishes standards for various classes of generators. The standards of 40 CFR §262 are incorporated by reference. Storage requirements given at 40 CFR §265.15 are also included.
Hazardous Waste Management: Transporter Standards	RCSA §22a-449(c)103	Offsite Requirement	This section establishes standards for hazardous waste transporters. The standards of 40 CFR §263 are incorporated by reference.
Hazardous Waste Management: TSDF Standards	RCSA §22a-449(c)104	Relevant and Appropriate (Applicable to Investigation Derived Waste)	This section establishes standards for treatment, storage, and disposal of hazardous waste, and establishes standards for closure, post closure, and ground water monitoring. The standards of 40 CFR §264 are incorporated by reference. Underground injection of hazardous wastes, and placement of free liquids in landfills are prohibited.
Hazardous Waste Management: Interim Status Facilities and Ground water Monitoring requirements, Closure and Post Closure Requirements	RCSA §22a-449(c)105	Relevant and Appropriate (Applicable to Investigation Derived Waste)	This section establishes interim status standards for treatment, storage, and disposal of hazardous waste, and establishes standards for closure, post closure, and ground water monitoring. The standards of 40 CFR §265 are incorporated by reference. The Commissioner may require ground water monitoring based on site specific considerations.
Hazardous Waste Management: Management Standards for Specific Waste Types	RCSA §22a-449(c)106	Relevant and Appropriate (Applicable to Investigation Derived Waste)	This section establishes standards for specific types of wastes, including waste oil and spent lead acid batteries being reclaimed. The standards of 40 CFR §266 are incorporated by reference.

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**List of State Applicable or Relevant and Appropriate Requirements
For Area A Weapons Center (Site 20) Feasibility Study
Naval Submarine Base New London**

Action Specific ARARs			
Requirement	Citation	Status	Synopsis of Requirement
Hazardous Waste Management: Land Disposal Restrictions	RCSA §22a-449(c)108	Relevant and Appropriate (Applicable to Investigation Derived Waste)	This section incorporates by reference the Federal Land Disposal Restrictions given at 40 CFR §268.
Hazardous Waste Management: Permit Requirements	RCSA §22a-449(c)110	Relevant and Appropriate (Applicable to Investigation Derived Waste)	This section incorporates by reference the Federal hazardous waste permitting requirements given at 40 CFR §§270 & 124.
Transportation of Oils and Chemical Liquids	CGS §22a-454	Offsite requirement	These rules require permits for persons who transport oils and chemical liquids.
Control of Noise Regulations	RCSA §§22a-69-1 to 69-7.4	Applicable	These regulations establish allowable noise levels. They would apply to construction activities at a site.
Water Pollution Control	RCSA §§22a-430-1 to 8	Applicable	These rules establish permitting requirements and criteria for water discharge to surface water, ground water and POTWs.
Water Pollution Control	CGS §22a-430b	Applicable	This section establishes general permits for many categories of discharges including storm water, and discharges to a POTW by a ground water remediation system. General permits may require that the discharge be registered with the Commissioner prior to initiating the discharge.
Water Pollution Control	CGS §22a-430	Applicable	This section prohibits discharge to the waters of the State without a permit.
Water Quality Standards	CGS §22a-426	Applicable	Connecticut's Water Quality Standards were adopted under this statute. They establish specific numeric criteria, designated uses, and anti degradation policies for groundwater and surface water.
Air Pollution Control-Stationary Sources	RCSA §22a-174-3	Applicable	This regulation requires section requires permits to construct and operate stationary sources of emissions, and requires those sources to meet specified standards. Pollution abatement controls may be required. Specific standards are listed for many pollutants. Any landfill with potential emissions of any particular air pollutant including methane exceeding 5 tons per year requires a permit under subsection 3(a)1(K). Active gas collection systems with emissions controls may be required.

**List of State Applicable or Relevant and Appropriate Requirements
For Area A Weapons Center (Site 20) Feasibility Study
Naval Submarine Base New London**

Action Specific ARARs

Requirement	Citation	Status	Synopsis of Requirement
Air Pollution Control- Control of Particulate Emissions	RCSA §22a- 174-18	Applicable	This subsection sets specific standards for particulate emissions. Specific standards include Fugitive Dust (18b), and Incineration (18c). Gas flares are regulated as incinerators.
Air Pollution Control- Control of Organic Compound Emissions	RCSA §22a- 174-20	Applicable	Subsection (f) sets standards for emission of organic compounds. Incineration of organic halocarbons is prohibited under subsection (f)(6)(A).
Air Pollution Control- Control of Odors	RCSA §22a- 174-23	Applicable	This section prohibits emission of any substance that constitutes a nuisance because of objectionable odor.
Air Pollution Control- Control of Hazardous Air Pollutants	RCSA §22a- 174-29	Applicable	This section establishes testing requirements and allowable stack concentrations for many specific substances.
Regulations for the Well Drilling Industry	RCSA 25-128- 33 through 64	Applicable	These rules apply mainly to any new water supply or withdrawal wells. The rules specify that non water supply wells must be constructed so that they are not a source or cause of groundwater contamination. Procedures for abandonment of wells apply to both water wells and other types of wells.
Registration and Permitting of Wells and Well drillers	CGS 25-126 thru 131	Applicable	Well drillers must be registered and permits and fees are required for each water supply well drilled. Separate registrations apply to water supply and non-water supply drillers. Permits are not required for non water supply wells. However, the driller must file a completion report for both water supply wells and non-water supply wells.
CT Guidelines for Soil Erosion and Sediment Control	CT Council on Soil and Water Conservation	Applicable	The guidelines provide technical and administrative guidance for the development, adoption and implementation of erosion and sediment control program.

Location-Specific ARARs

Requirement	Citation	Status	Synopsis of Requirement
Coastal Management Act	CGS 22a-90 through 112	Applicable	This statute establishes Connecticut's enforceable coastal zone policies in accordance with the federal Coastal Zone Management Act.
Inland Wetland and Watercourses Act	CGS 22a-36 through 45	Applicable	These statutes regulate any operation in or affecting a wetland or watercourse involving removal or deposition of material or any obstruction, construction, alteration or pollution of such wetlands.

**List of State Applicable or Relevant and Appropriate Requirements
For Area A Weapons Center (Site 20) Feasibility Study
Naval Submarine Base New London**

Location-Specific ARARs			
Requirement	Citation	Status	Synopsis of Requirement
Surface Water and Wetlands- Inland Wetlands and Watercourses Regulations	RCSA §§22a-39-1 to 15	Applicable	These regulations apply to activities within or affecting inland wetlands.
Surface Water and Wetlands- Inland Wetlands and Watercourses Act- General Permit Requirements	CGS§ 22a-45a	Applicable	This section authorizes the Commissioner to adopt a general permit for various minor activities including installation of water quality monitoring equipment, excavation of test pits and core sampling.