



**STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



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

April 26, 2000

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 *Proposed Remedial Action Plan for Site 20- Area A Weapons Center*, Naval Submarine Base New London, Groton, Connecticut

Dear Mr. Evans:

The Department has received and reviewed the draft *Proposed Remedial Action Plan for Site 20- Area A Weapons Center* at the Naval Submarine Base New London in Groton. The Proposed Plan was dated April 2000. The Department received this document on April 14, 2000.

**General Comments**

The preferred alternative consists of two elements: 1) Selective excavation of constituents of concern in soil and sediment, and 2) Offsite disposal or asphalt batching of excavated soil and sediment. The State supports the proposed alternative.

The purpose of the Proposed Plan is to explain clearly to the non- technical reader the nature of the contamination at the Weapons Center, and to explain how the Navy plans to address the contamination. The Proposed Plan as written does not accomplish that goal. The Proposed Plan uses many technical terms and acronyms without first defining them. In many places, the language of the Proposed Plan is overly technical and confusing. Several technical and regulatory terms are used in places where more simple language could be used without sacrificing the accuracy of the information being conveyed. The Proposed Plan requires substantial revision to make it more understandable to the non- technical reader.

**Specific Comments**

**Page 1 Cleanup Proposal**

In the first check mark, please replace "constituents of concern" with "contaminants."

**Page 3 Site History**

Despite its title, this section discusses the general layout of the site, but it does not provide any

*State Comments on Area A Weapons Center Proposed Plan*

*Page 2 of 4*

*April 26, 2000*

information regarding the history of the site. Please revise the text to include a short history of the Area A Weapons Center site, including past land use and possible sources of the contamination that the Navy is addressing.

Findings of the Field Investigations and Summary of Site Risks

The language in this section is highly technical, and is unlikely to be understood by the non-technical reader who is the intended audience for the proposed plan. This section should be re-written to be more understandable by a non- technical reader. The use of jargon and acronyms should be minimized, and all technical terms should be defined. Please include in the glossary definitions for the following terms: phthalate esters, polycyclic aromatic hydrocarbons, Preliminary Remediation Goal, Central Tendency Exposure, and Reasonable Maximum Exposure. The concept of "Central Tendency Exposure" and "Reasonable Maximum Exposure" should be carefully explained, or the terms should be eliminated from the Proposed Plan. It would be sufficient to say that conservative estimates were made of the risk to human health posed by contaminants in soil and sediment.

In the last paragraph, and throughout the document, the term "10<sup>-5</sup> PRGs" is confusing. A less confusing term might be "risk- based cleanup goals."

Page 4 Figure 2- Drainage Area Boundaries

What are the red dots on this figure? Most of the dots are near the fences. The electric line which serves Building 524 and Building 393 could be eliminated from the diagram to reduce "clutter" which makes the diagram confusing.

Page 5 Summary of Alternatives Considered for Site 20

In the paragraph above the table, please define the acronym "FS."

Throughout this table, please use the term "contaminants," rather than "COCs."

In the Components column, for item 3b, the first bullet point should read "Selective excavation of contaminants in soil and sediment."

In the Comment column, the Navy should consider using a more simple term than "chemical specific applicable or relevant and appropriate requirements." A possible alternative would be "legally required cleanup levels."

In the Comment Column, for Alternatives 1 and 2, replace "for 30- year projection" with "over a projected 30- year period."

***State Comments on Area A Weapons Center Proposed Plan***

***Page 3 of 4***

***April 26, 2000***

Page 5 Alternative Evaluation Criteria

The Navy proposes to meet the more stringent of either the Remediation Standard Regulation criteria, or cleanup levels based on an excess lifetime carcinogenic risk of  $10^{-5}$ . Please note that Remediation Standard Regulation Criteria are based on an excess lifetime carcinogenic risk of  $10^{-6}$  for individual contaminants, and a risk of  $10^{-5}$  for the cumulative risk posed by multiple contaminants. For this reason, the Remediation Standard Regulation criteria will be more stringent than cleanup goals based on a  $10^{-5}$  carcinogenic risk.

In the first paragraph, replace "10<sup>-5</sup> risk- based PRGs" with "risk based cleanup goals."

For Criteria 4, "Reduction of toxicity, mobility, or volume through treatment," please include "CERCLA" in the Glossary.

Page 6 The Navy's Proposed Remedy

In the first paragraph, replace "Residential 10<sup>-5</sup> Risk- Based PRG" with "residential risk- based cleanup levels."

Page 6 The Public's Role in Alternative Selection

Please check the telephone number for Darlene Ward. I believe her telephone number is (860) 694-4256.

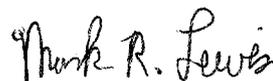
My title is "Environmental Analyst 3."

Page 7 Glossary of Terms

The definition for "sediment" is confusing. A more understandable definition, adapted from the Remediation Standard Regulations, would be "soil, sand and minerals occurring in a stream channel, pond, or other body of water."

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

***State Comments on Area A Weapons Center Proposed Plan***

***Page 4 of 4***

***April 26, 2000***

cc: Ms. Kymberlee Keckler, US Environmental Protection Agency, 1 Congress St., Suite 1100  
(HBT), Boston, MA 02114-2023

Ms. Darlene Ward, Naval Submarine Base New London, Environmental Department,  
Environmental Department, Building 166, Groton, CT 06349-5100

Mr. Charles E. Mcleod, Jr., P.E., EA Engineering, Science and Technology, 3 Washington  
Center, Newburgh, NY 12550