



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

April 18, 1994

David Miu, RPM
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

RE: EPA's Comments on the Halliburton NUS Corporation letter
Dated March 28, 1994

Dear Mr. Miu:

The purpose of this letter is to transmit EPA's comments on the subject letter concerning Investigation-Derived Waste (IDW) disposal at the Naval Submarine Base - New London, Groton, Connecticut.

The referenced letter recommends disposal practices that are consistent with the objectives presented in EPA guidance document "Management of Investigation-Derived Wastes During Site Inspections", dated May 1991. The Navy should be aware that state regulations may be more stringent than federal and any final disposal decisions should be consistent with state regulations.

Discharge of pumping test water, decontamination water and well development and purge water into the base sewer system is one of the above referenced guidance document's recommended disposal methods provided that the discharge is in conformance with the POTW's discharge permit and that the discharge is in conformance with the sewer discharge permit. This permit can be an amendment to the sewer discharge permit application on file now at the EPA and must be "in hand" prior to conducting the pump test. As the approval usually takes some time to secure, you should have been coordinating with Mr. Richard "Skip" Hull, Water Division EPA, at (617) 565-4881 who is working to develop other pre-treatment permits for New London. He can advise you as to the analysis and contaminate levels that will be required to be met prior to disposal.

Any containerized IDW must, at a minimum, be accumulated in accordance with State and Federal container management requirements for hazardous waste (i.e., drums in good condition, closed containers, etc.,) promulgated under the Resource



Conservation and Recovery Act (RCRA). This method of storage is a protective measure until a proper hazardous waste determination is conducted on the IDW to determine whether any additional RCRA requirements may apply.

The drill cuttings to be spread onto the ground at the Area A Landfill need to be characterized within a sufficient time period prior to the capping of the Landfill. The actual spreading of the cuttings must be timed to correspond with the construction of the cap to minimize the potential exposure due to volatilization of contaminants.

If you have any questions regarding these comments, you should feel free to call me at (617) 573-5736.

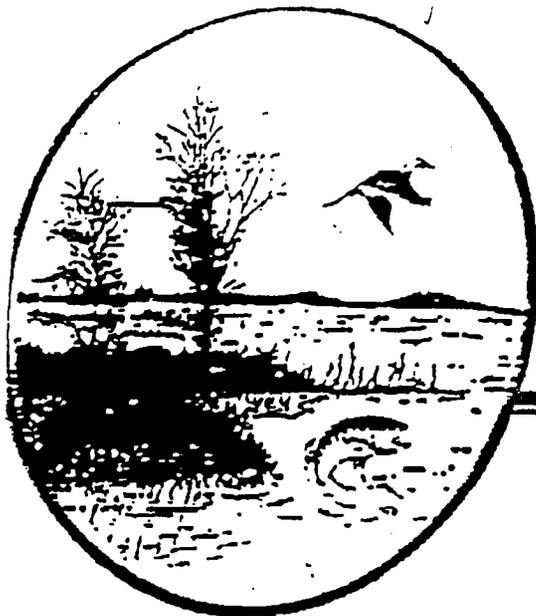
Sincerely,



Christine Williams, RPM
Federal Facilities Superfund Section

cc. Mark Leone, CT DEP
Skip Hull, EPA/Water w/enclosure
Ken Rota, EPA/RCRA w/enclosure
Mary Sanderson, EPA w/enclosure

Frank 10/15



ENVIRONMENTAL

DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
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Phone #: Commercial (610) 595-0567
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FROM:

NAME:

Yano Min

PHONE:

610 595-0567 x 151

TO:

Christine Williams

ACTIVITY:

EPA

FAX NUMBER:

617 573-9662

REMARKS:

4 pages total incl cover

DEX TRANSMITTED

BY: _____
DATE: _____
TIME: _____

Christine.

*PLEASE REVIEW ATTACHED TRANSLATIONS MEMO
AND PROVIDE WRITTEN COMMENTS ASAP; NG 40694.*

My FAX NUMBER IS 610-595-0555.

Thanks.

*Yano Min
4-05-94.*



561 ANDERSEN DRIVE • PITTSBURGH, PENNSYLVANIA 15220 (412) 921-7090

C-49-03-4381

March 28, 1984

Halliburton NUS Project Number 9594

Commanding Officer, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Mail Stop #82
Lester, Pennsylvania 19113-2090

Attention: Mr. Dave Miu

Reference: Clean Contract N62472-90-D-1298
Contract Task Order No. 129

Subject: Disposal of Investigation - Derived Wastes
for Subase NLON

Dear Mr. Miu:

Attached is Halliburton NUS' recommended procedures for disposal of investigation - derived wastes that are being generated at Subase NLON. The procedures were developed based on conversations with the Navy, USEPA, and the State of Connecticut; in addition to guidance provided in the EPA document, "Management Investigation - Derived Wastes During Site Inspections" EPA/540/G-91/009, May 1991.

Your review, comment, and distribution to the EPA and State of Connecticut for review and comment is greatly appreciated. All comments are requested to be received at my office on or before March 31, 1984; so that revisions can be made and resources can be obtained prior to the start of the pumping test activities, which are scheduled for the week of April 4, 1984. Application has already been made with the State of Connecticut regarding disposal of all waters to the base sewer system, as detailed in the Halliburton NUS letter dated March 28, 1984, which has also been copied to your attention.

If you have any questions or comments, I can be reached at 412-921-8418.

Very truly yours,

Matthew G. Cochran
Matthew G. Cochran
Project Manager

MGC/sic

Attachment

cc: Brian Helland (Northdiv)
Mark Leipert (Northdiv)
Andy Stackpole (Subase - NLON)
CTO 129 File

INVESTIGATION - DERIVED WASTES

Five types of investigation-derived wastes (IDW) are being generated at Subase, NLGN. Those wastes include Personal Protection Equipment (PPE), pumping test water, drilling and sampling equipment decontamination water, well purge waters, and drill cuttings. A description of the recommended disposal procedures for each waste type is included in the following paragraphs. Pertinent page numbers of the EPA document titled "Management of Investigation - Derived Wastes During Site Inspections", EPA/540/G-91/009, May, 1991; will be referenced as appropriate for further guidance.

It should be noted that none of the IDW generated at Subase NLGN are considered to be RCRA Hazardous waste due to the expected low levels of contamination, and the fact that no RCRA listed wastes were mixed with the IDW. The IDW will however, contain low levels of CERCLA hazardous substances.

PPE - PPE that has been collected during the field investigation has been decontaminated and bagged and deposited in the site dumpster in accordance with the recommended procedure on pages 23 and 25. Approximately a total of 50 garbage bags filled with PPE will be deposited in the dumpster during the course of the entire field investigation.

Recommendation - Continue current practice

PUMPING TEST WATER - A 72-hour pumping test will be conducted during the week of April 4, 1994 at the Area A landfill. Approximately 22,000 gallons of groundwater will be removed at a rate of 5 gallons per minute from pumping well 2LPW16, which will require disposal. A sample of the groundwater was collected and sent to the laboratory for analyses of TCL volatile and semivolatile compounds.

Recommendation - Application has been made with the State of Connecticut for approval to dispose of this water to the base sewer system. Pending approval from the State, it is recommended that the water be disposed in this manner.

DRILL RIG DECONTAMINATION AND SAMPLING DECONTAMINATION WATER -

Approximately 4000 gallons of water has been collected as the result of steam cleaning operations and the rinsing of sampling equipment from various locations at the base. The water has been containerized in labeled, 55-gallon drums and stored at the equipment decontamination area near the Area A Landfill.

Recommendation - Application has been made with the State of Connecticut for approval to dispose of this water to the base sewer system. Pending approval from the State, it is recommended that the water be disposed in this manner.

WELL DEVELOPMENT AND PURGE WATER - Approximately 250 gallons of development and purge water from the first round of groundwater sampling has been collected in labeled 55-gallon drums and stored at the equipment decontamination area near the Area A Landfill.

Recommendation - Application has been made with the State of Connecticut for approval to dispose of this water to the base sewer system. Pending approval from the State, it is recommended that the water be disposed in this manner.

A total of approximately 500 gallons of groundwater will also be generated during monitoring well purging from the second round of groundwater sampling, which will be conducted in June, 1994. It is recommended that groundwater that has no expectation of contamination and is visually free from contaminants be discharged onto the ground surface next to the well to allow infiltration, as recommended on page 23 and 25 of the reference document. Ground water that is suspected to be contaminated will be collected and stored in labeled 55-gallon

drums. A second application will be completed and submitted to the Connecticut DEP to allow for disposal of water to the base sewer system.

DRILL CUTTINGS - All drill cuttings collected during the field investigation have been stored in labeled 55-gallon drums (approximately 200 drums total) at the Area A Landfill decontamination area.

Recommendation - At the completion of all drilling activities, analytical results and field logs pertaining to the drummed cuttings will be reviewed. Drums with little or no known contaminants will be spread onto the ground at the Area A Landfill as recommended on pages VI, 23, and 25 of the reference document. Drums with elevated levels of contaminants will be disposed of off site in an appropriate manner (see page 26 of the reference document), based on the level and type of contamination detected. An inventory of the drummed cuttings collected and the recommended disposal option will be forwarded to the NAVY for approval prior to disposal.