



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

August 31, 2000

Mr John Burleson
BRAC Environmental Coordinator
Stratford Army Engine Plant
550 Main Street
Stratford, CT 06497

Re Revised Draft Engineering Evaluation/Cost Analysis for the Causeway and Dike
Stratford Army Engine Plant
Stratford, Connecticut

Dear Mr Burleson.

The United States Environmental Protection has reviewed the Revised Draft Engineering/Cost Analysis (EE/CA) for the Causeway and Dike at the Stratford Army Engine Plant in Stratford, Connecticut. The EE/CA is dated July 2000.

This version of the EE/CA included a new alternative which had not been included in the first draft of the document. It is EPA's understanding that this alternative (Alternative 4) was added to the EE/CA as a result of comments from the Connecticut Department of Environmental Protection (DEP). Further, based on EPA's review of the revised draft EE/CA, EPA notes that this new alternative (Alternative 4) is the Army's recommended removal action

Attachment I to this letter provides a few comments related to the Revised Draft EE/CA. With the exception of these comments, which relate to the analysis of Applicable, Relevant and Appropriate Regulations (ARARs) only, EPA has no other specific comments on the Revised Draft EE/CA. EPA believes that Alternative 4 is a protective remedy since it involves the removal of soils with the greatest potential for leaching contaminants to the groundwater, thereby eliminating the need for a multi-layer impermeable cap. In addition, the erosion control system as presented prevents exposure to contamination left in place, and will minimize erosion. Future monitoring and upkeep of the erosion control system is a key factor to ensure protectiveness in the future. In addition, the implementation of land use controls and monitoring of these controls are also key components of the recommended removal action.

If you have any questions regarding this matter, please contact me at (617)918-1387.

Sincerely,

Meghan F. Cassidy

Meghan F. Cassidy
Remedial Project Manager

Enclosure

cc: ✓ Michelle Brock/Army Corps of Engineers
Ken Feathers/CT DEP
RAB Members
John Beling/EPA

ATTACHMENT I

The following are EPA's comments on the document entitled Revised Draft Engineering/Cost Analysis (EE/CA) for the Causeway and Dike at the Stratford Army Engine Plant in Stratford, Connecticut. The EE/CA is dated July 2000.

1 Table 3-1

- There should be an indication that there are no Federal chemical-specific ARARs
- There should be some description of how contaminated soil will be remediated in accordance with CGS §§ 22a-133k and 22a-133q

2 Table 3-2

- There should be some description of how remedial activities that involve dredged or fill material will comply with 40 CFR § 230 and 33 CFR Parts 320-330
- There should be some description of how remedial activities affecting the coastal zone of the site will be conducted in accordance with 16 USC §1451, et seq
- There should be some description of how remedial activities will be conducted in accordance with CGS §§ 22a-28 through 22a-35 and RCSA §§ 22a-30-1 through 22a-30-17
- There should be some description of how remedial activities will be conducted in accordance with CGS §§ 25-68b through 25-68h and RCSA §§ 25-68h-1 through 25-68h-3
- There should be some description of how remedial activities will be concluded in accordance with CGS §§ 22a-359 through 22a-363(f)

3 Table 3-3

- There should be some description of how remedial activities associated with design, monitoring and maintenance will comply with 40 CFR § 264.110 - 264.120