UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

March 27, 2000

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

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

Dear John.

The United States Environmental Protection Agency (EPA) has reviewed the draft document entitled "Engineering Evaluation/Cost Analysis for the Causeway and Dike, Stratford Army Engine Plant, Stratford, Connecticut." This Engineering Evaluation/Cost Analysis (EE/CA) is dated February 23, 2000.

EPA's comments on the above-mentioned EE/CA are provided in Attachment I to this letter. Also attached is a marked-up version of the ARARs tables that were included in the EE/CA. This marked up version of the ARARs tables was sent to you under separate cover, but is also included here for completeness.

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

Sincerely,

Meghan F. Cassidy
Remedial Project Manager

Enclosures

cc: Michelle Brock/Army Corps of Engineers
Ken Feathers/CT DEP
Scott Richmond/Gannett-Fleming
Yoon-Jean Choi/EPA

ATTACHMENT I

The following are the EPA's comments on the document entitled "Engineering Evaluation/Cost Analysis for the Causeway and Dike, Stratford Army Engine Plant, Stratford, Connecticut." This Engineering Evaluation/Cost Analysis (EE/CA) is dated February 23, 2000.

General Comments

1. The EE/CA adheres to EPA guidance for the evaluation of remedial alternatives. The assessment of the alternatives considered is complete and objective. For the most part, the final recommendation of Alternative 1 is supported by the information presented. By incorporating the information outlined in the comments below, EPA believes the Army has provided sufficient information to support a removal action.

2. Remedial Alternatives 1 and 2 have the potential for leaching of soil contaminants to groundwater. Therefore, these alternatives should include long-term monitoring of groundwater and cap integrity .

Specific Comments

1. Executive Summary, Page E-2, Causeway. The text notes removal actions for the radiological-contaminated material are to be completed by the spring 2000. The text goes on to add that the radiological material will not be included in the scope of the removal action alternatives evaluated in this EE/CA. The text should address this statement in more detail and provide a date for the removal action at the Dike.

2. Page ES-3, 2nd Paragraph, Removal Action Alternatives and Page 4-2 (and throughout the report): The titles of Alternatives 1 and 2 are not clear. EPA suggests changing to the following:

Alternative 1 Capping with Synthetic Geomembrane

Alternative 2 Capping with Composite Cover System and Vertical Barrier

3. Page 2-4, Section 2.1.3, Existing Conditions, Surface Water, 1st paragraph: In addition to average tidal elevations at the site, a 100-year flood elevation should be included for proper cap design for protection against wave action.

4. Page 2-9, §2.3 ¶3 The text notes preliminary results of groundwater data collected from monitoring wells installed in the Causeway indicated low concentrations of chlorinated VOCs and inorganic analytes. The date these results were reviewed or the date these samples were taken at the Site should be provided in the text.

5. Page 2-11, §2.4, Preliminary Risk Evaluation The text states that a risk evaluation is being performed for the surface and subsurface soils in the Causeway and Dike area as part of the RI. The text should discuss whether this RI and risk assessment will include the soil contaminants

addressed in this document assuming that the contaminants are left in-place.

6. Page 4-3, Section 4.1.1, Description of the Alternative, 3rd Paragraph and Page 4-8:

1) 1st sentence: Add "during a 100-year storm event" after "...from storm surge or wave action."

2) 2nd sentence: The stone size should be determined based on design conditions for the worst storm event at the site. The weight of the proposed stones (i.e., 600 pounds) should not be specified without the design calculations.

3) 5th sentence: The proposed gas venting layer can't be converted to an active gas treatment system unless additional gas wells are installed above the lowest groundwater level. EPA recommends deleting the 5th sentence.

7. Page 4-4, Section 4.1.2: the text acknowledges that Alternative 1 "...may not prevent water from the tidal action of the Housatonic River in contacting some of the contaminated material and potentially transporting soluble contaminants out of the limits of the cap," and, similarly, notes that the sheetpile wall that is proposed as part of Alternative 2 will serve to reduce this possibility. The importance of this limitation on the effectiveness of Alternative 1 relative to that of Alternative 2 should be assessed. If tidal "flushing" of the Causeway/Dike were to occur, what risks will be posed to potential receptors? Can a worst-case scenario be constructed (e.g. rapid mobilization of a suite of contaminants, followed by dilution within the river system) in order to provide some basis for weighing the importance of this potential transport pathway?

8. Page 4-4, §4.1.2, Long -Term Effectiveness The text states that Alternative 1 may not prevent water from tidal action of the Housatonic River from contacting some of the contaminated material and potentially transporting soluble contaminants out of the limits of the cap. The text should discuss how this will be addressed in the remedial alternative.

9. Page 4-7, Section 4.2.1, Description of the Alternative, 2nd Paragraph: The text indicates that UV-stabilized vinyl sheet pile material will be used. It is not clear whether the proposed PVC sheet piles can provide long-term structural stability against lateral cover loading and wave actions. Brief design calculations supporting the selection of PVC sheet piles rather than steel sheet piles should be provided in the EE/CA.

10. Page 4-9, Section 4.2.2: While the advantages of the sheetpile wall are enumerated clearly (e.g., minimization of the hydraulic connection between the Causeway and the river), a disadvantage that is not spelled out is the finite lifetime of the sheetpile structure The wood (although pressure treated) and the vinyl will have a finite service life due to their ultimate degradation. The expected lifetime of these materials in this environment should be discussed.

11. Page 4-13, Section 4.3.1: The text states, "Reconstruction of the Causeway with clean fill was not included under this alternative" While reconstruction does appear to be a separate issue from remediation (at least to a large extent), complete removal of the Causeway seems to be at odds with the future use scenarios (e.g., recreation) and perhaps with community interest at the site. While this is clearly acknowledged later in the EE/CA (p. 5-4, sec. 5.2.2), perhaps this issue should be noted here in section 4.3.1 as well.

12. Page 5-3, Section 5.2.2: The evaluation of the balancing criterion "Reduction of toxicity, mobility, or volume through treatment" is correct in what it says about reduction of toxicity, mobility, and volume for the proposed remedial alternatives. However, the presentation is somewhat misleading as written, in that the criterion specifically addresses reduction through treatment, and neither isolation of contaminants beneath a cap or physical removal constitutes treatment. The EE/CA acknowledges this clearly in other sections where it is stated for example, that isolation "...does not include active treatment and therefore, does not satisfy the CERCLA statutory preference for treatment" and that, in a removal, "...the contaminated materials is simply transferred to another facility..." The fact that isolation and/or removal does not constitute "treatment" in the strictest sense should be acknowledged again here in this section (5.2.2). The qualifying statements given in the present draft should then be given as supporting arguments to the effect that some of the objectives of treatment are met by the proposed remediation schemes (e.g., capping reduces mobility; removal reduces volume on the particular site of concern) These arguments are relevant in that they mitigate to some extent the failure to meet the preference for "active treatment."

13. Page 5-3, Section 5.2.2: the evaluation of the balancing criterion "short-term effectiveness" simply states that all three alternatives carry some risk to site workers, but does not attempt to assess the relative risks among the alternatives considered Such an assessment should be given in order to provide a complete basis for comparison. In particular, it is noted that Alternative 3 would appear to have the potential to mobilize far more contaminants (e.g., via airborne dust) because of the extensive excavation. On the other hand, Alternative 3 is estimated to have a shorter construction time than the other alternatives.

14. Page 5-3, §5.2.2, Long-term effectiveness and permanence: The text states that Alternatives 1, 2, and 3 all provide long-term effectiveness. The text should discuss how long-term effectiveness is evaluated without groundwater monitoring and cap integrity monitoring.

TABLE 3-1
CHEMICAL-SPECIFIC ARARS CRITERIA, ADVISORIES, AND GUIDANCE

Regulations

ENGINEERING EVALUATION/COST ANALYSIS
CAUSEWAY AND DIKE NON-TIME-CRITICAL REMOVAL ACTION

STRATFORD ARMY ENGINE PLANT
STRATFORD, CONNECTICUT

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	ACTION TO BE TAKEN TO ATTAIN ARAR
SOIL/SEDIMENT				
State	Connecticut Department of Environmental Protection (CTDEP) Remediation Standard ~~(Title 22a Parts 133k and 133q)~~ (CGSA §§22a-133k and 22a-133q)	Applicable	Remediation standards have been promulgated for several common organic and inorganic contaminants. These levels regulate the concentration of contaminants in soil and groundwater (Section 22a-133k-2, and Appendices A and B). Section 22a-133k-2(f)(2) allows the use of an engineered control to isolate contaminated soil. This section includes specific requirements for the engineered control, including but not limited to, permeability, monitoring, and maintenance. In conjunction with the engineered control, an environmental land use restriction must be implemented in accordance with Section 22a-133q-1. Sections 133k and 133q also provide requirements for public involvement and approval by the Commissioner of Environmental Protection prior to implementation of any engineered control or environmental land use restriction.	Contaminated soil will be remediated in accordance with the standards for soil remediation as specified in this regulation. An engineered control and environmental land use restriction will be implemented in accordance with these requirements.

Notes.
ARAR = Applic[illegible] or Relevant and Appropriate Requirement
CTDEP = Conne[illegible]ut Department of Environmental Protection

[ADD REFERENCE DOSES AND CANCER SLOPE FACTORS AS FEDERAL TBCs IF THEY WERE USED. SEE ATTACHMENT.

TABLE 3-2
LOCATION-SPECIFIC ARARS, CRITERIA, ADVISORIES, AND GUIDANCE

ENGINEERING EVALUATION/COST ANALYSIS
CAUSEWAY AND DIKE NON-TIME-CRITICAL REMOVAL ACTION

STRATFORD ARMY ENGINE PLANT
STRATFORD, CONNECTICUT

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	ACTION TO BE TAKEN TO ATTAIN ARAR
WETLAND/FLOODPLAINS				
Federal	Protection of Wetlands - Executive Order 11990 (40 CFR 6, Appendix A)	Applicable	Under this order, federal agencies are required to minimize the destruction, loss, or degradation of wetlands and preserve and enhance natural and beneficial values of wetlands.	These requirements will be met during the development of alternatives. If no practicable alternative exists, potential harm will be minimized and action taken to restore the natural and beneficial values of the wetland. In addition, remedial activities will be designed to minimize impacts to the wetlands.
	Flood Plains Management – Executive Order 11988 (40 CFR 6, Appendix A)	Applicable	Under this order, federal agencies are required to avoid long-term and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid support of floodplain development wherever there is a practicable alternative.	These requirements will be met during the development of alternatives. If no practicable alternative exists, potential adverse impacts will be minimized and action taken to restore the floodplain. In addition, remedial activities will be designed to minimize adverse impacts on the floodplains.
	Clean Water Act (CWA) Section 404(b)(i) Guidelines for Specification of Disposal Sites for Dredged or Fill Material (40 CFR 230; 33 CFR Parts 320-330)	Applicable	Section 404 of the CWA regulates the discharge of dredged or fill material into U.S. waters, including wetlands. The purpose of Section 404 is to ensure that proposed discharges are evaluated with respect to impact on the aquatic ecosystem.	Remedial activities that involve dredged or fill material discharge to a wetland will comply with these requirements.
	Rivers and Harbors Act of 1899 (33 USC 403)	~~Applicable~~ Relevant and Appropriate	Section 10 of the Rivers and Harbors Act of 1899 requires authorization from the Secretary of the Army, acting through the U.S. Army Corps of Engineers (USACE), for the construction of any structure in or over any "navigable water of the U.S.", the excavation from or deposition of material in such waters, or any obstruction or alteration in such waters.	Permits are not required for on-site actions conducted under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). However, the action taken will comply with the substantive requirements of this act.
	Coastal Zone Management Act (16 USC 1451 et seq.)	Applicable	The Coastal Zone Management Act requires activities affecting the coastal zone, including lands therein and thereunder and adjacent shorelands, be conducted in accordance with approved state management programs.	Remedial activities affecting the coastal zone of the site will be conducted in accordance with these requirements.

Tidal Wetlands Regulations (CGS §§ 22a-28 through 22a-35; RCSA §§ 22a-30-1 through 22a-30-17

Applicable

Activities within or affecting tidal wetlands are regulated.

Remedial activities will be conducted to comply with these regulations.

TABLE 3-2
LOCATION-SPECIFIC ARARS, CRITERIA, ADVISORIES, AND GUIDANCE
ENGINEERING EVALUATION/COST ANALYSIS
CAUSEWAY AND DIKE NON-TIME-CRITICAL REMOVAL ACTION
STRATFORD ARMY ENGINE PLANT
STRATFORD, CONNECTICUT

(CGSA §§ 22a-36 through 22a-45a ; RCSA §§ 22a-39-1 through 22a-39-15)

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	ACTION TO BE TAKEN TO ATTAIN ARAR
State	Inland Wetlands and Watercourses Act (Title 22a Chapter 440)	Applicable	This act requires that actions be taken to protect, preserve, and maintain inland wetlands and watercourses, including protecting the quality of the wetlands and watercourses for their conservation, economic, aesthetic, recreational, and other public and private uses and values.	Remedial activities will be conducted to minimize disturbance of wetlands and watercourses, prevent loss of beneficial aquatic organisms, wildlife, and vegetation, and prevent destruction of natural habitats.
	Coastal Management Act (Title 22a Chapter 444) (CGSA §§ 22a-90 through 22a-112)	Applicable	This act requires that actions be taken to insure that the development, preservation, or use of land and water resources of the coastal area is conducted without significantly disrupting either the natural environment or sound economic growth. ; 40 CFR 6.302	Remedial activities will be conducted to minimize adverse impacts on natural coastal resources, including the potential impact of coastal flooding and erosion and damage to and destruction of life and property.
OTHER NATURAL RESOURCES				
Federal	Endangered Species Act (16 USC 1531)	Applicable	This act requires that actions be taken to conserve endangered or threatened species, including consultation with the Department of Interior.	Remedial activities will not impact any endangered or threatened species.
	Fish and Wildlife Coordination Act (16 USC 661 et seq.)	Relevant and Appropriate	This act requires that any federal agency proposing to modify a body of water must consult with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and other related state agencies.	Notification is not required for on-site actions conducted under CERCLA. However, actions will be taken to minimize impacts to wetlands.
	National Historic Preservation Act (16 USC 470)	Applicable	This act requires that actions be taken to preserve historic properties, recover and preserve artifacts, and minimize harm to National Historic Landmarks.	Remedial activities will comply with these requirements.
State	Connecticut Endangered Species Law	Applicable	This act requires that actions be taken to conserve endangered or threatened species.	Remedial activities will not impact any endangered or threatened species.

Notes.
ARAR Applicable or Relevant and Appropriate Requirement
CERCLA Comprehensive Environmental Response, Compensation, and Liability Act
CFR Code of Federal Regulations
CWA Clean Water Act
USACE United States Army Corps of Engineers
USC United States Code

TABLE 3-3
POTENTIAL ACTION-SPECIFIC ARARs, CRITERIA, ADVISORIES, AND GUIDANCE

ENGINEERING EVALUATION/COST ANALYSIS
CAUSEWAY AND DIKE NON-TIME-CRITICAL REMOVAL ACTION

STRATFORD ARMY ENGINE PLANT
STRATFORD, CONNECTICUT

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	ACTION TO BE TAKEN TO ATTAIN ARAR
AIR				
Federal	Clean Air Act (CAA) National Ambient Air Quality Standards (40 CFR Part 50)	Applicable Relevant and Appropriate ~~To be considered~~	This requirement provides standards for specific pollutants (i.e., "criteria pollutants"), including particulate matter (40 CFR 50.6). This requirement specifies maximum annual arithmetic mean and maximum 24-hour concentrations for particulate matter equal to or less than 10 microns particle size (PM_{10}).	PM_{10} emissions at the property boundary will be maintained below the 24-hour maximum of 150 $\mu g/m^3$ and the annual arithmetic mean of 50 $\mu g/m^3$ by dust suppression.
	CAA National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 61, Subpart M)		This requirement provides emission standards for specific pollutants for which no ambient air quality standard exists. NESHAPs have been promulgated for specific source types emitting certain pollutants, including asbestos. Subpart M establishes standards for inactive waste disposal sites and disposal of asbestos-containing material from demolition and renovation operations.	Although these standards do not directly apply to the asbestos-containing material in subsurface soil on the Causeway, these standards will be considered during design and implementation of remedial activities.
State	Connecticut Department of Environmental Protection (CTDEP) Abatement of Air Pollution ~~(Title 22a Part 174-24)~~ (CGSA Title 22a, Chapter 446c; RCSA §§ 22-174-1 et seq.)	Applicable	These regulations require permits to construct and to operate specified types of emission sources and contain emission standards that must be met prior to issuance of a permit. Pollutant abatement controls may be required. Specific standards pertain to fugitive dust ~~(18b)~~ and control of odors ~~(23)~~. (RCSA §22a-174-23) (RCSA §22-174-18(b))	Emission standards for fugitive dust will be met with dust control measures during excavation, transportatic and consolidation to comply with substantive requirements.

TABLE 3-3
POTENTIAL ACTION-SPECIFIC ARARS, CRITERIA, ADVISORIES, AND GUIDANCE

ENGINEERING EVALUATION/COST ANALYSIS
CAUSEWAY AND DIKE NON-TIME-CRITICAL REMOVAL ACTION

STRATFORD ARMY ENGINE PLANT
STRATFORD, CONNECTICUT

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	ACTION TO BE TAKEN TO ATTAIN ARAR
SURFACE WATER				
Federal	Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) (40 CFR Part 122, 125, 131, 136)	Applicable	This rule requires permits for the discharge of pollutants from any point source into U.S. waters.	Excavation dewatering fluids will be routed through the on-site Oil Abatement Treatment Plant (OATP) prior to discharge to surface water. Effluent will meet the OATP discharge limitations, monitoring requirements, and best management practices.
State	Water Pollution Control Act ~~(Title 22a Chapter 446k)~~ (CGSA §§ 22a-416 through 22a-438; RCSA §§ 22a-430-1 through 22a-430-7)	~~Relevant and Appropriate~~ Applicable	This act requires permits for any discharge of water, substance, or material into the waters of the state.	Excavation dewatering fluids will be routed through the on-site OATP prior to discharge to surface water. This activity will be conducted in accordance with the requirements of this act (e.g., ~~permit application/modification,~~ monitoring requirements, and discharge limitations).
SOIL/WASTE MATERIAL				
Federal	RCRA Identification and Listing of Hazardous Waste; Toxicity Characteristic (40 CFR 261.24)	Applicable	This requirement defines those wastes that are subject to regulation as hazardous waste under 40 CFR Parts 124 and 264.	Analytical results will be evaluated against the criteria and definitions of hazardous waste. The criteria and definition of hazardous waste will be referred to and utilized in development of alternatives and during remedial actions.
	RCRA Standards Applicable to Generators of Hazardous Waste (40 CFR Part 262)	Applicable	These standards govern storage, labeling, accumulation times, and disposal of hazardous waste.	Any hazardous waste generated during remedial activities will be managed in accordance with these standards.

TABLE 3-3
POTENTIAL ACTION-SPECIFIC ARARS, CRITERIA, ADVISORIES, AND GUIDANCE

ENGINEERING EVALUATION/COST ANALYSIS
CAUSEWAY AND DIKE NON-TIME-CRITICAL REMOVAL ACTION

STRATFORD ARMY ENGINE PLANT
STRATFORD, CONNECTICUT

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	ACTION TO BE TAKEN TO ATTAIN ARAR
	RCRA Container Storage Requirements (40 CFR Part 264, Subpart I)	Applicable	These requirements apply to owners and operators of facilities that use container storage to store hazardous waste.	If containers are used to store materials that are hazardous wastes, the containers will be managed according to these rules.
	RCRA Subtitle C Requirements (40 CFR Part 264)	Relevant and Appropriate	These requirements outline specifications and standards for design, operation, closure, and monitoring of performance for hazardous waste treatment, storage, and disposal facilities (TSDFs).	Substantive RCRA requirements will be met and adhered to for on-site remedial activities.
	RCRA Subtitle C, Subpart B – General Facility Standards (40 CFR 264 10 – 264.19)	Relevant and Appropriate	These standards provide general requirements regarding waste analysis, security, training, inspections, and location applicable to a facility that stores, treats, or disposes of hazardous waste (i.e., a TSDF).	This regulation may be applicable to remedial actions that address a waste that is a listed or characteristic waste under RCRA and constitute current treatment, storage, or disposal as defined by RCRA.
	RCRA Subtitle C, Subpart C – Preparedness and Prevention (40 CFR 264.30 – 264.37)	Relevant and Appropriate	These requirements are applicable to the design and operation, equipment, and communications associated with a TSDF, and to arrangements with local response departments.	This regulation may be applicable to remedial actions that address a waste that is a listed or characteristic waste under RCRA and constitute current treatment, storage, or disposal as defined by RCRA.
	RCRA Subtitle C, Subpart D – Contingency Plan and Emergency Procedures (40 CFR 264.50 – 264.56)	Relevant and Appropriate	These requirements include planning procedures applicable to a TSDF.	This regulation may be applicable to remedial actions that address a waste that is a listed or characteristic waste under RCRA and constitute current treatment, storage, or disposal as defined by RCRA.

Guidelines for Soil Erosion and Sediment Control	The Connecticut Council on Soil and Water Conservation	To be considered	The guidelines provide technical and administrative guidance for the development, adoption, and implementation of erosion and sediment control program.	These guidelines would be incorporated into any remedial designs for this site. Erosion and sediment control measures would be implemented during excavation, recapping, and well installation activities.

...NON-TIME-CRITICAL REMOVAL ACTION

STRATFORD ARMY ENGINE PLANT
STRATFORD, CONNECTICUT

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	ACTION TO BE TAKEN TO ATTAIN ARAR
	RCRA Subtitle C, Subpart F – Releases from Subtitle C Solid Waste Management Units (40 CFR 264 90 – 264.101)	Relevant and Appropriate	This regulation details groundwater monitoring requirements for hazardous waste treatment facilities. The regulation outlines general groundwater monitoring standards, as well as standards for detection monitoring, compliance monitoring, and corrective action monitoring.	Long-term groundwater monitoring for the site will be included as a component of remedial alternatives in a separate operable unit. Because this removal action is an interim action for the site, groundwater monitoring requirements will not be complied with for this interim action. However, at the conclusion of remedial actions for the entire site, the action will comply with these requirements.
	RCRA Subtitle C, Subpart G – Closure and Post-Closure (40 CFR 264 110 – 264 120)	Relevant and Appropriate	This regulation details general requirements for closure and post-closure of hazardous waste facilities, including installation of a groundwater monitoring program.	Remedial activities associated with design, monitoring, and maintenance will meet these requirements.
	Connecticut Department of Environmental Protection (CTDEP) Solid Waste Management ~~(Title 22a Part 209)~~	Relevant and Appropriate	This regulation specifies requirements for the design, operation, and closure of solid waste disposal facilities.	The design of a cover system will meet the minimum standards of this regulation.
	CTDEP Hazardous Waste Management ~~(Title 22a Part 449(c)~~	Relevant and Appropriate	This regulation specifies requirements for the design, operation, and closure of hazardous waste disposal facilities. This regulation incorporates by reference the RCRA requirements for hazardous waste facilities.	The design of a cover system will meet the minimum standards of this regulation.

CGSA Title 22a, Chapters 446d and 446k; RCSA §§ 22a-208a-1 and 22a-209-1 through 22a-209-16

(CGSA §§ 22a-454 and 22a-449(c); RCSA §§ 22a-449(c)-100 through 110 and 22a-449(c)-11)

and management of any hazardous wastes generated during remedial activities

TABLE C-1

CHEMICAL-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS, ADVISORIES, AND GUIDANCE
SITE 8 - GOSS COVE LANDFILL
NAVAL SUBMARINE BASE NEW LONDON
GROTON, CONNECTICUT

Requirement	Citation	Stat	Requirement Synopsis	Evaluation/Action to Be Taken
FEDERAL				
Cancer Slope Factors (CSFs)		TBC	CSFs are guidance values used to evaluate the potential carcinogenic hazard caused by exposure to contaminants.	The selected remedy would prevent exposure to contaminated media and thereby minimize human health concerns.
Reference Dose (RfDs)		TBC	RfDs are guidance values use to evaluate the potential noncarcinogenic hazard caused by exposure to contaminants.	The selected remedy would prevent exposure to contaminated media and thereby minimize human health concerns.
STATE OF CONNECTICUT				
Remediation Standard Regulations	RCSA Section 22a-133k-1 through 3 (Established pursuant to CGS Section 22a-133k)	Applicable	These regulations provide specific numeric cleanup criteria for a wide variety of contaminants in soil, groundwater, and soil vapor. The regulations include a procedure for establishing criteria where none exist for a particular contaminant and for establishing criteria where those specified in the regulation are not appropriate	The selected remedy would comply with these standards because of employment of the engineered control.