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Tutu Wells Site
Draft Feasibility Study

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We have reviewed the draft Feasibility Study report for the Tutu Wells Superfund site, and offer the following comments:

- A short paragraph at the end of Section 3.1.1, Remedial Action Objectives, states that "No RAOs are needed for environmental settings or ecosystems. Based on the findings of the Draft Final RI, no ecosystems are potential receptors of COCs through the groundwater or soil pathways ..." This statement does not address the concerns that EIB and the BTAG have regarding certain ARARs, especially those that are location-specific. Since we did not receive copies of either EPA's December 28, 1994 comment letter to de maximis, inc., or the Draft Final Phase II RI Report (February 1, 1995), we do not know if our concerns have been adequately answered. We would appreciate your providing us with copies of these documents for that purpose.
- There are a number of potential ARARs and TBCs that were not addressed in either the draft RI or this document. These include the Endangered Species Act (ESA), the National Historic Preservation Act (NHPA), the Fish and Wildlife Coordination Act, the Coastal Zone Management Act, and Executive Orders 11988 and 11990. These ARAR's may or may not be live issues, but there is no way of knowing without appropriate analysis. Because the preferred remedial alternatives include soil excavation and construction of a water treatment plant, both the ESA and the NHPA almost automatically come into play. Although many of the areas where excavation and construction will take place may be too disturbed to be sensitive for these resources, the Potentially Responsible Parties must make sure that there will be no adverse impacts due to their actions. Adequate documentation of any investigations should be provided if we are to be in compliance with these location-specific requirements. We believe it is important to address these issues before a draft Record of Decision is prepared.

*Lead Plan Manager
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Thank you for the opportunity to comment on this document. We would be pleased to assist you in resolving any issues by reviewing the above-mentioned documents and any others that might provide pertinent information. If there are questions regarding our comments, the RPM can contact Robert Witte of my staff at ext. 4-6681.

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