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NSB NEW LONDON
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EMAIL REGARDING U S EPA REGION I APPROVAL OF RESPONSE TO COMMENTS ON
LETTER REPORT FOR INNER PIER 1 PRE DESIGN INVESTIGATION NSB NEW LONDON
CT
12/09/2009
U S EPA REGION I

Wagner, Glenn

From: Keckler.Kymberlee@epamail.epa.gov
Sent: Wednesday, December 09, 2009 9:37 AM
To: Rich, Corey
Cc: Sullivan, Dan B.; gkemp@gfnet.com; Wagner, Glenn; Gravette, James CIV NAVFAC; Ken.Finkelstein@noaa.gov; Lewis, Mark; Conant, Richard CIV NAVFAC MIDLANT; Clarke, Roxanne; rtfinlayson@gfnet.com
Subject: RE: Letter Report for Inner Pier 1 Pre-Design Investigation, NSB-NLON, Groton, Connecticut

Thank you. These responses are acceptable and EPA does not plan to issue further comment. I look forward to seeing the dredging operations sometime soon.

Kymberlee Keckler, Chemical Engineer
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U.S. Environmental Protection Agency, Region 1
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<Corey.Rich@tetratech.com>

12/03/2009 01:22
PM

To
Kymberlee Keckler/R1/USEPA/US@EPA
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Subject
RE: Letter Report for Inner Pier
1 Pre-Design Investigation,
NSB-NLON, Groton, Connecticut

Kymberlee,

Thank you for EPA's input on the subject letter report. Responses to EPA's comments are provided below. Please contact Jim Gravette if you have any further questions regarding the letter report or the responses.

As you know, the Navy and Tetra Tech EC have initiated efforts on the Inner and Outer Pier 1 Non-Time-Critical Removal Action. The Navy and Tetra Tech EC will keep EPA, CTDEP, and other stakeholders informed on the progress of the action and any unforeseen issues that require resolution.

Regards,

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-----Original Message-----

From: Keckler.KyMBERlee@epamail.epa.gov [mailto:Keckler.KyMBERlee@epamail.epa.gov]
Sent: Wednesday, November 25, 2009 10:10 AM
To: Rich, Corey
Cc: Sullivan, Dan B.; gkemp@gfnet.com; Wagner, Glenn; Gravette, James CIV NAVFAC; Trepanowski, John; Ken.Finkelstein@noaa.gov; Lewis, Mark; Conant, Richard CIV NAVFAC MIDLANT; Clarke, Roxanne; rtfinlayson@gfnet.com
Subject: Re: Letter Report for Inner Pier 1 Pre-Design Investigation, NSB-NLON, Groton, Connecticut

EPA is pleased that the SAP was followed (except for the validation as noted in the letter report).

1) It appears from the photos that free product is present in several of the sediment samples. Please confirm. If correct, EPA is concerned about the plan to allow liquid to drain back into the river after only passing through a geotextile. This should be monitored closely when excavation begins. Excavation may have to be stopped and an alternative plan developed to treat the water before discharge or sample the surface water before opening the turbidity curtain.

Response: The sediment samples did not contain free product. There was no sheen on the sampling equipment or water during the sampling effort. The black color of the sediments is likely due to the high organic content and anaerobic conditions present in the Thames River. These samples were similar to others collected in the area during previous sampling efforts. The procedures detailed in the approved Work Plan should be sufficient to dewater the sediments. If conditions in the field are different than expected, the EPA and others will be notified and appropriate actions will be taken to address the issue.

2) Please consider segregating sediment based on the presence of free product or heavily contaminated sediment. For example, sediment formerly located under the pier was apparently isolated from the Inner Pier 1 sediment by the sheet piles and is likely less impacted by the former railroad activities. Also, sediment farther south in the Pier 1 Inner Area is also likely less contaminated. Mixing the sediment may create problems or increased costs for disposal.

Response: Based on available information, the sediment does not contain free product. Sediment dredging will proceed in accordance with the approved Work Plan. Additional segregation of the sediment is not expected to be required. If conditions in the field are different than expected, the EPA and others will be notified and appropriate actions will be taken to address the issue.

3) Table 1 indicates that at SD-014 sediment was penetrated to 8 feet even though a sample was only required from the 0-1 foot interval. Please confirm whether the 8-foot penetration is correct. If it is, the depth to bedrock may be greater than expected in some areas, but also that the bedrock gradients could be severe requiring greater care and effort to remove all sediment from the Pier 1 Inner Area. Please make the pre-excavation bathymetry survey results available to EPA before excavation begins (preliminary form OK).

Response: The penetration depth for SD-014 was 8 feet. The bedrock surface was expected to vary; however, this depth was greater than expected. The pre-excavation bathymetry survey will be conducted and the results provided to EPA and others before excavation begins.

Please let me know if you want to have a call on any of this.

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