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LETTER REGARDING THE TRANSMITTAL OF DRAFT FINAL LOWER SUBBASE SOIL AND  
GROUNDWATER COMPLETION REPORT AND FEASIBILITY STUDY ADDENDUM  
OPERABLE UNIT 4 (OU 4) NSB NEW LONDON CT  
09/08/2011  
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PITT-09-11-026

September 8, 2011

Project Number 112G03271

NAVFAC MID-ATLANTIC, Northeast IPT  
Attn: Mr. Dominic O'Connor (Code OPTE3-1)  
Bldg Z-144  
9742 Maryland Avenue  
Norfolk, Virginia 23511-3095

Reference: CLEAN Contract No. N62470-08-D-1001  
Contract Task Order WE67

Subject: Draft Final Lower Subbase (Operable Unit 4) Soil and Groundwater Completion Report and Feasibility Study Addendum  
Naval Submarine Base-New London, Groton, Connecticut

Dear Mr. O'Connor:

Please find enclosed two electronic copies (CDs) of the subject document for your review and comment. Electronic copies of the document were also distributed to the other members of the Naval Submarine Base – New London team per the distribution list provided below for their review and comment.

The following information is included in electronic format on each enclosed CD:

- Distribution Letter
- Connecticut Department of Energy and Environmental Protection (CTDEEP) Response-to-Comment (RTC) Document (Revision 1, July 6, 2011)
- Environmental Protection Agency (EPA) RTC Document (Revision 2, August 4, 2011)
- Volume I – Sections 1 through 6 (Text, Tables, and Figures)
- Volume II – Appendices A through E
- Volume III – Appendices F through K

The draft final Lower Subbase Soil and Groundwater Completion Report and Feasibility Study (FS) Addendum was prepared to address comments received from the CTDEEP and EPA on the draft version of the report. Revisions were made per the RTC documents that are included on the CDs. In general, the revisions were tracked in redline format so that the changes are easily identified. However, revisions to some appendices were not tracked because of the complexity of the changes or because they were new appendices (e.g., Appendices H.5, J.2.1, and J.2.2).

Major issues addressed in this revision include the following:

- Sediment Alternatives SD-3 and SD-4 were revised to address only CERCLA-contaminated sediment and not sediment associated with operational depths. In addition a new alternative, SD-8, was added to document the most likely alternative the Navy will select through the Proposed Plan and Record of Decision. To address sediment, new text, figures, and appendices were added to the report.
- LNAPL and TPH were removed from a majority of the report. LNAPL/TPH discussions were retained where 1) TPH-contaminated soil was commingled with a CERCLA contaminant and the TPH concentration would increase soil disposal costs and 2) the location or absence of LNAPL needed to be determined to justify the use of alternative PMCs. The appendices that included LNAPL alternative

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design calculations (former Appendix J.2) and cost estimates (former Appendix K.3) were removed from the draft final version of the report.

- As stated in the Response to EPA's Specific Comment (SC) 2, the focus of the Section 2 figures was to depict soil sample locations, especially the soil PDI sample locations, and the focus of the Section 3 figures was to show groundwater PDI sample locations. Therefore, Section 2 figures were revised to show all soil borings and monitoring wells, existing and abandoned, at which soil samples were collected and analyzed. The figures do not show wells at which no soil samples were collected. Section 3 figures were revised to show all wells, existing and abandoned/missing (if applicable), where groundwater samples were taken or groundwater levels were measured during Rounds 1 and 2 of the groundwater PDI. New figures (Figures 5-9 through 5-15) were added to Section 5 to show all of the wells inventoried (and only those wells inventoried). The figures were corrected to match these general guidelines provided in the Response to SC2 and as a result many of the wells specifically mentioned in the Responses to SC2 through SC6 were deleted from the figures, rather than having their status ("existing" or "abandoned, destroyed, or missing") corrected, as stated in the responses. For all wells on the Draft Final Section 2, 3, and 5 figures, the post-2010 inventory status is shown.
- The elevated lead concentration (orange) kriged area at depth in Zone 2 was again evaluated in response to EPA SC112. Lead data points had been artificially added in Zone 3 to represent the composite samples collected from along an excavation wall during the time-critical removal action. Although the Appendix E discussion in the draft report explained that the artificial data points had been added to the kriging model at 1, 3, and 5 feet below ground surface (bgs), further review of the model showed that they had been added at 1, 3, 5, 7, and 9 feet bgs. Inclusion of the artificial data points at 7 and 9 feet bgs caused the kriging to artificially project high lead concentrations below the groundwater table in Zones 2 and 3. Because the actual excavation stopped at the groundwater table, the artificial data points for 7 and 9 feet bgs were removed from the model. The lead Cross Section A-A' was updated on Figure E.1.28. Note that although the artificial locations (2-EXWW-ALBACORE-06-01 through -04 and EXWW-ALBACORE-06-01 through -04) are shown in plan on the Figure E.1.23 through E.1.26 insets, only the two "real" composite samples (2-EXWW-ALBACORE-06 and EXWW-ALBACORE-06) are shown on E.1.28.

Concurrence or additional input on the enclosed draft final Lower Subbase Soil and Groundwater Completion Report and FS Addendum are requested by October 10, 2011 (30 days). If you have any questions regarding the enclosed document, please contact me at (412) 921-8984.

Sincerely,

Corey A. Rich, P.E.  
New London Base Coordinator/Project Manager

CAR/clm

### Enclosure(s)

- c: Ms. Kimberlee Keckler, EPA Region 1 (3 CDs)  
Mr. Mark Lewis, CTDEP (1 CD)  
Mr. Ken Finkelstein, NOAA (1 CD)  
Mr. Ken Munney, USF&W (1 CD)  
Mr. Mike Brown, NSB-NLON (1 CD)  
Mr. Paul Steinberg, Mabbett & Assoc. (2 CDs)  
Mr. Garth Glenn, Tetra Tech-Norfolk (letter only)  
Mr. Glenn Wagner, Tetra Tech-PITT (letter only)  
Ms. Nina Balsamo, Tetra Tech-PITT (1 CD)  
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