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NSB NEW LONDON  
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EMAIL AND COMMENTS FROM U S FISH AND WILDLIFE SERVICE REGARDING DRAFT  
SAMPLING AND ANALYSIS PLAN FOR ZONE 4 SEDIMENT PRE DESIGN INVESTIGATION  
NSB NEW LONDON CT  
10/02/2011  
U S FISH & WILDLIFE SERVICE

**Rich, Corey**

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**Subject:** FW: Zone 4 PDI SAP NOAA

**From:** [Kenneth Munney@fws.gov](mailto:Kenneth.Munney@fws.gov) [<mailto:Kenneth.Munney@fws.gov>]  
**Sent:** Sunday, October 02, 2011 11:50  
**To:** Oconnor, Dominic CIV NAVFAC MIDLANT, NE IPT; [Keckler.Kymerlee@epamail.epa.gov](mailto:Keckler.Kymerlee@epamail.epa.gov)  
**Cc:** [Ken.Finkelstein@noaa.gov](mailto:Ken.Finkelstein@noaa.gov)  
**Subject:** Re: Zone 4 PDI SAP

Dominic and Kymerlee -

Thank you for the opportunity to review the Draft Sampling and Analysis Plan (SAP), Pre-Design Investigation (PDI) for Zone 4 Sediment, Naval Submarine Base, New London, CT, August 2011.

The following are informal technical comments on the document and EPA's comments.

We are interested in additional discussions concerning sediment conditions at Pier1, as stated by EPA. However, Pier 1 data is not presented in this PDI SAP or the focus of the document, so we are unsure why Pier 1 sample locations are presented in Figure 4-4, even though it is part of Zone 4.

Figure 4-4: Legend: It would be helpful to identify all year events for sampling, as done for the 2003 Pilot Sediment and 2008 Lower Sub Base sampling. This may also clarify the difference between the yellow and red locations.

Figure 5-1: Please explain why the study boundary does not include sediment areas encompassing all of Pier 2. Please explain why no sediment samples were ever taken along the outer east side of Pier 2 (where a ship is berthed in Figure 4-4). I understand that no additional samples are proposed for this area because it is outside the currently defined study limit but this appears to be a data gap, even though sediment samples further out from the pier are below PRGs.

Section 5.0: Sediment depth sampling is being conducted in 0-1' and 2-4' increments, as stated. We are interested to know how contamination at depth will be addressed for the 1-2' depth interval that is not characterized. For example, if criteria are exceeded in 0-1', but not at 2-4', will remediation potential include the 1-2' interval or would that interval be evaluated, post-excavation of the 0-1' interval, prior to further removal.

We agree with the contaminant contour lines as depicted (exceptions noted by EPA), the Navy proposed additional sampling locations and depths and the additional locations and depths, as outlined by EPA. As stated, additional locations may need to be sampled outside of the currently proposed locations, if exceedances of PRG criteria are found, at depth.

We are interested in further discussions regarding the PDI SAP and look forward to refinement of contaminant issues and remediation in the Zone 4 area.

Please let me know if you have any questions or concerns with the above comments.

Ken Munney  
USFWS  
Environmental Contaminants  
70 Commercial St - Suite 300  
Concord, NH 03301  
603-223-2541, ext.19

FAX 603-223-0104

Kenneth Munney@fws.gov

Inactive hide details for Keckler.Kymerlee@epamail.epa.govKeckler.Kymerlee@epamail.epa.gov