

N00129.AR.001454
NSB NEW LONDON
5090.3a

LETTER FROM U S EPA REGARDING RESPONSE TO U S NAVY COMMENTS TO DRAFT
FINAL SAMPLING AND ANALYSIS PLAN FOR PRE-DESIGN INVESTIGATION ZONE 4
SEDIMENT NSB NEW LONDON CT
2/14/2012
U S EPA

Rich, Corey

From: Kymberlee Keckler <Keckler.Kymberlee@epamail.epa.gov>
Sent: Tuesday, February 14, 2012 4:43 PM
To: Rich, Corey
Cc: Bernhardt, Aaron; Oconnor, Dominic CIV NAVFAC MIDLANT, NE IPT; kemp@mabbett.com; Kenneth_Munney@fws.gov; Ken Finkelstein; Ganser, Leanne; McKenzie, Tracey P CIV NAVFAC MIDLANT, PWD New London; mark.lewis@po.state.ct.us
Subject: Re: Responses to Comments - Draft Final OU4 Sediment PDI SAP

EPA reviewed the Navy's responses, dated February 2, 2012, to EPA's comments, dated January 19, 2012, for the Draft Final Sampling and Analysis Plan for Pre-Design Investigation for Zone 4 Sediment at the Naval Submarine Base New London dated December 2011 (PDI SAP). The document presents the Navy's plan to sample Zone 4 sediment to confirm the extent of contamination before preparing remedial design documents.

EPA accepts the responses and has no further comments on the Draft Final PDI SAP.

Kymberlee Keckler, Chemical Engineer
Federal Facilities Superfund Section
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code: OSRR07-3
Boston, MA 02109-3912

Telephone: 617.918.1385
Facsimile: 617.918.0385
E-mail: keckler.kymberlee@epa.gov

From: "Rich, Corey" <Corey.Rich@tetrattech.com>
To: Kymberlee Keckler/R1/USEPA/US@EPA, Ken Finkelstein <ken.finkelstein@noaa.gov>, "Kenneth_Munney@fws.gov" <Kenneth_Munney@fws.gov>
Cc: "Oconnor, Dominic CIV NAVFAC MIDLANT, NE IPT" <dominic.oconnor1@navy.mil>, "McKenzie, Tracey P CIV NAVFAC MIDLANT, PWD New London" <tracey.p.mckenzie@navy.mil>, "Bernhardt, Aaron" <Aaron.Bernhardt@tetrattech.com>, "Ganser, Leanne" <Leanne.Ganser@tetrattech.com>, "kemp@mabbett.com" <kemp@mabbett.com>
Date: 02/03/2012 02:32 PM
Subject: Responses to Comments - Draft Final OU4 Sediment PDI SAP

All,

Attached are response-to-comment documents that address EPA, NOAA, and USF&W comments on the draft final OU4 Sediment PDI SAP. Hopefully, these responses address the remaining issues; however, if further discussion is required, we can discuss these during an upcoming New London production call.

Regards,

Corey Rich, P.E. | Water Management Technical Lead/Senior Project Manager
Direct: 412.921.8984 | Main: 412.921.7090 | Fax: 412.921.4040 Corey.Rich@tetrattech.com

Tetra Tech, Inc. | TSS Group
661 Andersen Drive Foster Plaza 7 | Pittsburgh, PA 15220

PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.

[attachment "RTC_Z4SDSAP_NOAA_020212.docx" deleted by Kymberlee Keckler/R1/USEPA/US] [attachment "RTC_Z4SDSAP_USFW_020212.docx" deleted by Kymberlee Keckler/R1/USEPA/US] [attachment "EPA_RTC_Z4_DF_SAP_020212.docx" deleted by Kymberlee Keckler/R1/USEPA/US]

**RESPONSES TO JANUARY 19, 2012 EPA COMMENTS ON THE
DRAFT FINAL SAMPLING AND ANALYSIS PLAN FOR PRE-DESIGN INVESTIGATION
FOR ZONE 4 AND OUTER PIER 1 SEDIMENT
NAVAL SUBMARINE BASE – NEW LONDON, GROTON, CONNECTICUT**

Issue: February 2, 2012

SPECIFIC COMMENTS

Specific Comment (SC) 1: p. 16, §4.2

In the last paragraph please note that the concrete foundation for Pier 1 does not extend 175 feet from the CIF building; it is much less than that. It also forms the western boundary of the Inner Pier 1 area. Please correct.

Response:

Agree. The subject paragraph will be corrected to the following:

“The remaining northern portion of Pier 1 is constructed on a solid concrete foundation which extends approximately 125 feet from the CIF building (Building 564) into Thames River and forms the western boundary of the Inner Pier 1 area (see Figure 4-4). The former southern pile-supported portion of Pier 1 was demolished and removed by the Navy in 2009.”

SC2: p. 18, §4.5

The new text in the third paragraph suggests that dredging occurred in the south half of the dredge buffer. Review of the post-dredging bathymetry indicates that many of the sediment elevations within the dredge buffer are either identical to or very close to the sediment elevations east of the dredge buffer. This indicates that little to no dredging likely occurred within much of the southern half of the dredge buffer. The Navy should not rely on sediment having been removed from that area when planning the remedial action. In particular, contaminated sediment exceeding the cleanup goal at location TRZ4-SD-008 and continuing southward to the pier should be dredged to remove the top four feet of sediment. Confirmation sampling following remediation can determine if additional sediment removal is required beyond that. Alternatively, Navy could add sample locations to the dredge buffer for the PDI.

Response:

The subject text will be revised to the following:

“The design for maintenance dredging indicated that the resulting sediment surface was to have a 3H:1V slope from east to west. In an attempt to achieve the correct slope, it appears that some dredging occurred in the southern half of the dredge buffer, but based on a comparison of pre-dredge and post-dredge bathymetry data the design slope was not achieved. The depth to sediment in the northern half of the dredge buffer was greater than the required operational depth of 36 feet prior to maintenance dredging; therefore, no dredging was required in that area.”

Comments noted. Remedial alternative SD-8 (see OU4 final FS Addendum, draft final Proposed Plan, and final Record of Decision), which is the Navy's current preferred remedy, includes 2 feet of dredging in the southern half of the maintenance dredge buffer. The Navy will use the analytical results from the PDI, in particular data from samples TRZ4-SD-12 and TRZ4-SD13, to finalize delineating the extent of contaminated sediment that requires remediation in the southern half of the maintenance dredge buffer. The Navy will not commit to a specific dredging depth (e.g., four feet proposed by EPA) until the PDI results are available. No additional sediment samples will be added to the PDI. Confirmation sampling will be completed as part of the

sediment remedy and the sampling procedures will be documented in the Navy's forthcoming Remedial Design and Remedial Action Work Plan.

SC3: p. 23, §4.7

Two new paragraphs have been added to discuss Outer Pier 1. Consider moving the second paragraph to the first paragraph. Edit the current first paragraph to clarify that the samples outside the area of excavation for the Outer Pier 1 area did not have exceedances of the ecological PRGS except for TRP1-SD-005.

Response:

Agree. The second paragraph will be placed before the first paragraph. A statement will be added to the current first paragraph that indicates the only exceedance of ecological PRGS outside of the excavation area for the Outer Pier 1 was at location TRP1-SD-005.

SC4: p. 56, §5.3

- a) Please edit the second new sentence in the partial paragraph at the top of the page, because the planned monitoring will not determine if the sediments behind the quay wall are contaminated. The sentence should be changed to: "Post-remediation monitoring will be conducted to ensure that potentially-contaminated sediments behind the quay wall do not recontaminate the remaining Zone 4 sediments following the remedial action."

Response:

Agree. The requested change will be made.

- b) Please supplement the paragraph about Pier 6 being a northern boundary for the area of contamination by incorporating the response to EPA's earlier comment on this issue.

Response:

The following text will be added to explain the rationale for using Pier 6 as a northern boundary "Additional sediment samples are not needed north of Pier 6 because that is the start of Zone 3 and the ecological risk assessment for the Thames River showed that risks to ecological receptors in sediment adjacent to Zone 3 are relatively low."