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LETTER AND NO FURTHER COMMENTS FROM U S FISH AND WILDLIFE SERVICE
REGARDING PRE-DESIGN INVESTIGATION SAMPLING AND ANALYSIS PLAN FOR
OPERABLE UNIT 4 (OU4) SEDIMENT NSB NEW LONDON CT

2/29/2012

U S FISH AND WILDLIFE SERVICE

Rich, Corey

From: Kenneth_Munney@fws.gov
Sent: Wednesday, February 29, 2012 11:16 AM
To: Rich, Corey
Cc: Oconnor, Dominic CIV NAVFAC MIDLANT, NE IPT; Kymberlee Keckler; Ken Finkelstein
Subject: RE: Responses to Comments - Draft Final OU4 Sediment PDI SAP

Corey,

We have no further comments regarding issues with the Navy's New London OU4 Sediment PDI SAP or Response to Comments. We look forward to the sampling results and next steps. Please keep us informed of progress on the site and data generated.

Thanks

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"Rich, Corey" <Corey.Rich@tetrattech.com>

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02/27/2012 03:36 PM

To Kymberlee Keckler
<Keckler.Kymberlee@epamail.epa.gov>, Ken
Finkelstein <ken.finkelstein@noaa.gov>,
"Kenneth_Munney@fws.gov"
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cc "Oconnor, Dominic CIV NAVFAC MIDLANT, NE
IPT" <dominic.oconnor1@navy.mil>, "McKenzie,
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London" <tracey.p.mckenzie@navy.mil>, "Ganser,
Leanne" <Leanne.Ganser@tetrattech.com>, "Lewis,
Mark" <Mark.Lewis@ct.gov>

Subject RE: Responses to Comments - Draft Final OU4
Sediment PDI SAP

Ken Finkelstein and Ken Munney,

Do either of you have further comment on the response-to-comment documents sent on February 3, 2012 or the draft final Lower Subbase OU4 Sediment PDI SAP sent December 27, 2011? We are trying to finalize the SAP and would like to conduct the sampling in March/April 2012 timeframe, but would like your concurrence before starting. If possible, please provide your input before the end of this week.

Thanks,

Corey Rich, P.E. | Water Management Technical Lead/Senior Project Manager
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From: Rich, Corey
Sent: Friday, February 03, 2012 2:32 PM
To: 'Kymberlee Keckler'; 'Ken Finkelstein'; Kenneth.Munney@fws.gov
Cc: 'Oconnor, Dominic CIV NAVFAC MIDLANT, NE IPT'; McKenzie, Tracey P CIV NAVFAC MIDLANT, PWD New London; Bernhardt, Aaron; Ganser, Leanne; kemp@mabbett.com
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
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**RESPONSES TO OCTOBER 2, 2011 US FISH AND WILDLIFE SERVICE COMMENTS ON THE
DRAFT SAMPLING AND ANALYSIS PLAN FOR PRE-DESIGN INVESTIGATION
FOR ZONE 4 SEDIMENT AND JANUARY 25, 2012 COMMENTS ON THE DRAFT FINAL SAMPLING
AND ANALYSIS PLAN
NAVAL SUBMARINE BASE – NEW LONDON, GROTON, CONNECTICUT**

**Initial Issue: October 19, 2011; Revision 1 Issue: October 27, 2011;
Revision 2 Issue: November 23, 2011; Revision 3 Issue: February 2, 2012**

OCTOBER 2, 2011 COMMENTS:

GENERAL COMMENTS

Comment 1:

We are interested in additional discussions concerning sediment conditions at Pier 1, 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.

Response: The Pier 1 area was not the original focus of this investigation; however, based on EPA comments additional samples will be collected from the southern end of former Pier 1 to finalize characterization of the sediment. Only those samples from areas not dredged during the removal action will be retained on Figure 4-4. New sample locations will be added to Figure 5-1. The Navy is willing to discuss any further Pier 1 sediment issues with US Fish and Wildlife at your convenience.

Comment 2:

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.

Response: Comment noted.

SPECIFIC COMMENTS

Comment 1: Figure 4-4

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.

Response: Agree. The legend will be updated to include the years that sampling occurred for each event shown on the figure.

Further clarification required. There are no red locations shown on Figure 4-4.

Comment 2: 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.

Response: The study area boundary was developed based on the information provided in Section 5.3 of the SAP. As indicated in Section 5.3, historic source information and analytical data were used to develop the boundary. The conceptual site model does not suggest that additional sampling is warranted along the western side of Pier 2; however, one location will be added off the northwest corner of Pier 2 to address EPA and USF&W comments. Further expansion of the study boundary would only be considered if the results of the proposed Pre-Design Investigation indicate that the extent of contaminated sediment is not fully defined.

Based on input received from USF&W on October 20, 2011, proposed sample locations TRZ4-SD-010 and TRZ4-SD-011 will each be shifted approximately 60 feet to the southwest. This will allow sample TRZ4-SD-011 to be collected near the end of Pier 2 as requested by USF&W.

Additional Response: Based on a rebuttal received from EPA on November 14, 2011 regarding a response to their General Comment 3, sample locations TRZ4-SD-010 and TRZ4-SD-011 will be maintained at their original locations and sample TRZ4-SD-023 will be added to bound the extent of contamination south of TRZ4-SD-010. Existing sample location Z4-C2 provides adequate data to characterize the extent of contamination at southwest end of Pier 2.

Comment 3: 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.

Response: If only the 0-1 foot interval is impacted, sediment will be remediated from the 0-2 foot interval. Mechanical dredging would include over dredging to ensure that the adequate sediment is removed. Confirmation sampling would also be completed to confirm that contaminant concentrations in the remaining sediment are below remedial goals.

JANUARY 25, 2012 COMMENTS:

Comment 1:

Thank you for the opportunity to review the Draft Final SAP and PDI for Zone 4/Outer Pier 1, Naval Submarine Base - New London. The SAP/PDI appears to predominantly incorporate the resolution of issues and sampling areas as discussed previously. However, we are still concerned about the area on the south side of Pier 2, where a boat is berthed, as depicted in Figure 5-1. As previously commented on and discussed on the phone, there is a lack of sediment data for a long length of area along the outer pier, where boats have berthed, potentially on a regular basis. Although sample locations have been added to the NW of the pier (SD-24) and further out from the south side of the pier (SD-10, SD-11) and previous sampling (Z4-C2, Z4-6) have shown sediments to be below threshold criteria in areas further out from the pier, there is no data from along the outer pier, similar to location Z4-40. We would again suggest that at least one surface sediment sample should be added to this area, to further verify a lack of inorganic, PAH, or PCB contamination in near-pier surface sediments.

Response:

Please see the previous response to Specific Comment 2. Comment noted regarding the additional sample, but no change to the sampling program will be made at this time. The conceptual site model suggests that Site 13 - Former Waste Oil Pit was the primary source of the

sediment contamination and the current sampling program includes collection of 7 samples along two transects (north and south of Pier 2) to refine delineation of contamination in this area. Based on the decision rule included in Section 5.4, additional sediment sampling will be completed if the current PDI does not adequately complete the delineation. In addition, the proposed remedy includes confirmation sampling to ensure that all contaminated sediment is remediated.

Comment 2:

Additionally, we are unsure why sediment location Z4-S1 is not included within a ERM-Q exceedance contour similar to Z4-42 (even though Z4-5 is below the ERM-Q threshold). Presumably proposed location SD-10 will help to further bound that area to the southwest. Perhaps this issue has been discussed previously but please clarify.

Response:

Sample ZA-S1 was collected in 2004 and sample Z4-5 was collected in 2007. The most recent data (Z4-5) was used to develop the ERM-Q exceedance contour. The data from proposed location TRZ4-SD-10 will be used to further bound the area to the southwest.

Comment 3:

Ken Finkelstein (NOAA) has already provided summary comments, to which you have responded. We are unsure if EPA has provided comments on this Draft Final document, but believe their comments are pending. We look forward to further discussions with the Navy and other agencies and the finalization of the SAP/PDI.

Response:

NOAA provided comments on the draft final Sampling and Analysis Plan on December 30, 2011 and EPA provided comments on January 19, 2012. If required, the Sampling and Analysis Plan can be further discussed during the next New London Production Call, which will be conducted in February 2012.