

15 ROPE FERRY ROAD



WATERFORD, CT. 06385-2886

October 16, 1991

Adrienne Townsel
Department of the Navy
Northern Division
Naval Facilities Engineering Command
Building 77 L US Naval Base
Philadelphia, PA 1912-5094

RE: COMMENTS ON "REMEDIAL INVESTIGATION REPORT"
NAVAL SUBMARINE BASE, GROTON, CONNECTICUT

Dear Ms. Townsel:

As Waterford's representative to the Technical Review Committee I am submitting the following comments and attachments for your consideration.

THAMES RIVER

1. The recommendations contained in Section 8 summary and conclusions relative to moving forward with Step II investigations and feasibility studies for remediation are supported. We are particularly interested and supportive of the additional testing to be conducted in the Thames River. These investigations should include ground and surface water quality monitoring on a regular interval.
2. Sediment testing and sampling of fish and shellfish adjacent to the base should be done. I have attached a report from John Volk, Director of the Aquiculture Division of the State Department of Agriculture. This report on the status of shellfishing in the Thames River indicates that due to chemical and sewage discharges from the base (page 3) a prohibited area was established 1000' into the River.

In your consideration of ARAR the degree of remediation to be undertaken, particularly as it relates to compliance with State surface and ground water quality classification goals, it is recommended that all reasonable efforts be taken to identify and control discharges to the River. It is recommended that you contact Mr. Volk for any guidance he may be able to provide to you in studying the shellfish resources adjacent to the Base. I have also attached the maps showing the location of shellfish beds leased by the Town of Waterford in the Thames River.

OTHER SOURCES

1. In reviewing the information for the Goss Cove Landfill there appears to be some uncertainty regarding levels of radioactivity in samples taken. I raised the question at the last TRC meeting, whether or not the Navy had verified the disposal of all low level radwaste generated on the site. The answer was no. Will the Navy be reviewing its records of disposal of low level and other nuclear wastes generated on site?
2. Sewage discharge was assumed to have been resolved with the connection of the Base to public sewers. Mr. Volks letter indicates that sewage discharges are one of the reasons for the prohibited shellfish designation. Have all buildings been connected and are there any tests of surface and ground waters for fecal chloroform that have been conducted to determine if in fact sewage discharges are still occurring?
3. In my review of the study there was not any discussion of efforts to institute a set of best management practices to insure that spills and discharges of chemicals are prevented in the future. What actions have been taken to comprehensively address the handling of materials and should these efforts be documented in this study.

In conclusion, I look forward to the results of the quantitative analysis to be conducted on the impact of the Base on the Thames River. I believe the determination of the appropriate remediation needed is dependent on the impact on the receiving waters.

Thank you for this opportunity to comment.

Sincerely,



Thomas V. Wagner, AICP
Planning Director

cc: A. Gigliotti, First Selectman
John Volk, Director of the Department of Agriculture
Planning & Zoning Commission
Paul Jansen, Water Resource
Art Rocque, OLISP