15 ROPE FERRY ROAD WATERFORD, CT. 06385-2886

December 11, 1992

Ms. Deborah Stockdale
Department of the Navy
Northern Division
Naval Facilities Engineering Command
Building 771 US Naval Base
Philadelphia, PA 1912-5094

RE: COMMENTS ON: DRAFT PHASE II REMEDIAL INVESTIGATION
NAVAL SUBMARINE BASE, GROTON, CONNECTICUT

Dear Ms. Stockdale:

The focus of these comments will be on the investigations that will be conducted in the Thames River to determine the levels of pollutants in the sediments, their impact on the benthic environment, and the proposed remedial actions to mitigate those impacts. I will also comment on my expectations of the role of the Technical Review Committee (TRC) and the need for additional information on the roles and responsibilities of the State and Federal Agencies involved in this process.

TECHNICAL REVIEW COMMITTEE:

At the TRC meeting of December 2, 1992 the issue of the role of the TRC was discussed. I have found that attending TRC meetings is informative and provides me with sufficient opportunity to put forth comments, which have been reflected in subsequent studies. I agree with your statement, relative to the frequency of the TRC meetings being tied to major milestones in the process.

I would like the Navy to consider calling one meeting of the TRC to discuss the issue of the role and function of the TRC and its members. At this meeting, I would like to know what the status of the Federal Facilities Agreement is and what this had to do with the proposed By-Laws for the TRC.

Can the State and Federal Representatives be prepared to discuss with the TRC their specific responsibilities in this process, any present areas of disagreement, or impasse and what they perceive the role of the TRC to be? I would also like to hear more on the availability of technical assistance funds from the EPA for third party assistance in reviewing these plans for the municipalities involved.

THAMES RIVER TESTING

1) Review of previous studies:

In reviewing the plan for testing to be conducted on sediments, finfish, and shellfish in the Thames River the authors made reference to the draft EIS for the dredging of the Thames River to accommodate the Seawolf class of submarine. We had commented on that draft and had raised issues on the methodology used in sampling. Specifically, we were concerned about the mixing of samples to create a homogeneous sample as opposed to doing individual samples. How much of this data will be used in drawing conclusions to be used in your analysis and will the methodology used be verified in order to fit within your sampling parameters?

Additional data should also be available from DEP for any of the NPDES permitted site along the Thames River. The AES Thames project was required to do a lot of testing in the River.

2) Testing methodology and locations:

We have expressed in previous comments concerns over the prior dredging of the Thames River and the deposition of this material on land in Waterford presently owned by General Dynamics. The outfall of the dredge disposal site occurs in the northwestern corner of your testing grid. If pollutants have been found to have made it into the Thames River is it possible that the material previously dredged from the River is also contaminated? In your testing, will you be testing sediment and water quality from the Cove adjacent to this disposal area?

The depth of the sediment samples should in part relate to any future dredging of the Thames River. This would then be factored into the remediation and health risks components of the plans.

Thank you for this opportunity to comment. I look forward to your response to these comments and request for additional information.

Sincerely,

Thomas V. Wagner, AICP
Planning Director

cc: P. Burgess Atlantic
Bill Mansfield
Art Rocque, OLIS
Paul Joneson, DEP Water Resources
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