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February 8, 1993

Commander Oliver E. Barfield, CEC, U. S. Navy
Public Works Officer
Naval Submarine Base New London
Groton, Connecticut 06349-5000

Re Installation Restoration Program

Dear Commander Barfield:

Thank you very much for inviting the public to attend the meeting of the Technical Review Committee on February 4, 1993. The usefulness of a combined meeting could not have been better illustrated than by Mr. McGagh's presentation of the U. S. Environmental Protection Agency's "Technical Assistance Grant Program". I came away from the meeting with the feeling that not many present at the meeting were familiar with the "Technical Assistance Grant Program" before Mr. McGagh's presentation whereas this program was discussed in detail during past public meetings. Under your present meeting format, all concerned hear exactly the same discussions. This minimizes misunderstandings.

The following comments related to the February 4th meeting are furnished for your consideration. The comments are meant to be constructive. I realize there are many options in managing the Installation Restoration Program and I fully support your work.

Comments

1. Pinelock Drive

a. There appears to be a tilt toward expanded testing and accommodation of residents in this location without a corresponding increase in accommodation of residents in other locations within your test area. This may be appropriate because of the proximity of Pinelock Drive to the northern boundary of Naval Submarine Base New London. However, my concern is that in providing very specific information about the TRC, its members, and records to an individual whom I assume resides in the Pinelock Drive area, the U. S. Navy implies that the TRC and its members somehow represent individuals in the community in the same manner as elected Representatives. This is not my understanding of the purpose of the TRC. The TRC, as I understand its purpose, is to review technical data compiled by Consultants and to provide comments for the public record and for consideration by Agencies managing the Superfund Project at Naval Submarine Base New London.

While residents are free to communicate with members of the TRC, there is the risk that such communications will never become part of the public record and hence never be considered on its merits. I assume that correspondence from concerned individuals should be addressed to Naval

Submarine Base New London (your office) and not to the TRC. I know of no other way to ensure that concerns are evaluated.

2. Correspondence on Restoration Program Matters

a. I recommend that you provide guidance to the public on procedures to follow in communicating with the U. S. Navy about the Installation Restoration Program.

3. Public Meeting

a. I recommend that you enter into the public record the name of the host of the public question and answer period. That is, does the public address questions to the U. S. Navy, to the TRC, or to the Consultants. I understand that two distinct meetings take place on the same date. But because the public question and answer period follows the TRC meeting, the implication is that the TRC conducts the public question and answer period. Consequently, individuals participating in the question and answer period may view the TRC as their representative, which may or may not be the case.

4. Background Testing

a. I note that you will relocate testing sites TBB4, TBB5, and TBB6 from Naval Submarine Base New London to sites in the Town of Ledyard. You made no mention of similar testing sites in the Town of Groton even though a portion of Area "A" is located in the Town of Groton and the highest concentrations of boron were found in residential wells in the Town of Groton at 1292 Route 12 and 1320 Route 12. Also, by line of site it appears that the area south of Area "A" is at a lower elevation than the new testing sites in the Town of Ledyard. Thus, it is possible that some outflows from area "A" may travel south even though your studies indicate that most outflows travel west toward the Thames River.

5. Project Oceanology

a. You stated that Project Oceanology files as well as other published studies will be reviewed in connection with further testing of Thames River water. I presume that the reviews will extend to the Environmental Impact Statement filed to support dredging projects in support of 688-class submarines

6. Statistical Methods

a. These comments may be out of order because the Consultant did not have the opportunity to fully explain his rationale for displaying statistical information under the normal curve. Averages (mean values) do not appear to be appropriate because samples taken for the Installation Restoration Program are not taken to draw an inference about a population nor to statistically determine if sampling results occur by chance. That is, the allowable level for each element sampled has already been determined scientifically. The most effective way, in my view, to display test results would be by bar graphs showing test results compared to allowable levels. This method is the "descriptive statistics" method defined by Roger C. Pfaffenberger and James H. Patterson in Statistical

Methods as a method to describe a specific numerical quantity such as an average or a total to summarize or condense a large set of numbers. These authors define "inferential statistics" as the process of drawing inferences about the whole population from a subset of the population (the sample). The "inferential statistics" method does not appear to be appropriate in evaluating samples related to the Installation Restoration Program because "chance" is not a factor. Either a sample exceeds or is lower than the scientifically acceptable standard. The risk that "chance" occurs is offset by evaluating test results at different testing laboratories.

b. Averages may obscure test results. It appears that raw numbers are important in locating specific hazardous object that could be removed from a site. This type of information may make it possible to remove specific objects or small amounts of material thus restoring a site at minimum cost.

3. Mr. Fromer's Recommendation

a. Mr. Fromer recommended that core samples to taken from deeper depths. This recommendation, in my view, is worthy of consideration. Mr. Fromer's recommendation implies that a core sample be taken from the bottom of the ravine as it existed before dredged materials were deposited in Area "A".

4. Test Borings

a. You have our permission to take core samples on our property. We have undisturbed areas (i.e. no septic tank in the areas) that may be suitable for testing.

5. Additional Well Water Testing

a. There is an inactive shallow well on are property that you may wish to include in the expanded testing program.

I hope that the foregoing information is useful. Please call if you need more information.

Sincerely,


Bart Pearson