

March 3, 1993

Mr. Thomas V. Wagner, AICP
Planning Director
Town of Waterford
15 Rope Ferry Road
Waterford, CT 06385-2886

RE: Phase II RI Work Plan
Naval Submarine Base - New London
Groton, Connecticut
Atlantic Project No.: 1256-18-04

Dear Mr. Wagner:

This letter was prepared on behalf of the Navy in response to your comments of December 11, 1992, regarding the Draft Phase II RI Work Plan dated November 1992.

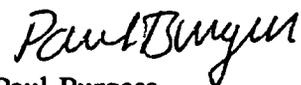
Our responses to your comments are attached and are indexed to correspond to your comments.

Should you have any specific questions, please feel free to contact me or Deborah Stockdale.

Sincerely,

ATLANTIC ENVIRONMENTAL
SERVICES, INC.


Barry L. Siroux
Principal Engineer


Paul Burgess
Principal

BLG/PB:jls
Enclosure

cc: Deborah Stockdale - NORDIV
William Mansfield - NSB-NLON

**Navy Response to Town of Waterford Comments (December 11, 1992)
on the Draft Phase II Remedial Investigation Work Plan (November 1992)**

Technical Review Committee

We agree with the Town of Waterford's concern regarding the TRC and propose to hold TRC meetings on a quarterly basis. The next TRC meeting scheduled for February 4, 1993 will include the following agenda items:

- Role of the TRC
- Technical Assistance Grants
- Federal Facilities Agreement (FFA)

Thames River Testing

1. Review of previous studies:

Mr. Wagner is concerned that the work plan referring to sediment sampling done for the draft EIS in preparation for dredging related to the Seawolf submarine. The sediment samples were composited over depth for that study. The work plan for the Thames River stipulates the collection of grab samples of surficial sediment. Therefore, the results of this sampling will not be strictly comparable with the results of the draft EIS. The results of the sampling in the work plan will be more representative of exposure concentrations for benthic organisms and bottom-dwelling fish, and will be of more significance in decision making.

Mr. Wagner also pointed out that additional data on the Thames River is available from DEP. Readily available and accessible data on the Thames River was reviewed to prepare the work plan. As part of the planned literature review, additional Thames River data will be sought and reviewed.

2. Testing methodology and locations:

Mr. Wagner states that following previous dredging work on the Thames River, dredge spoils were deposited on land in Waterford presently owned by General Dynamics. He is concerned that contamination may have been present in those dredge spoils. He also notes that the outfall from the dredge disposal site is in the northwest corner of the area where sediment samples will be collected. He asks if sediment and water samples will be collected from the cove adjacent to the dredge disposal site.

Sediment sample locations were selected to represent conditions in the river near the Subase site and away from its influence. Sampling in the cove adjacent to this dredge disposal area is not planned at this time. This type of testing, off the Subase property, is not within the scope of the installation restoration program.

Mr. Wagner also states that the depth from which sediment samples are collected should represent future dredging of the river. Since future dredging of the channel is not a certainty and since contamination at depths below the surface are expected to be less than surface samples, evaluation of future dredging projects is not within the scope of work of the Risk Assessment that will not be conducted as part of this work plan. As stated above, the ecological assessment will measure concentrations in surficial sediments to provide realistic exposure concentrations for benthic organisms and bottom-dwelling fish.