

May 25, 1994

Mr. Mark Evans, Remedial Project Manager
Environmental Restoration Branch
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop #82
Tinicum Industrial Park
Lester, PA 19113-2090

**RE: FOCUS FEASIBILITY STUDY FOR INSTALLATION RESTORATION OF
SUBMARINE BASE, GROTON, CT**

Dear Mr. Evans:

As a member of the Technical Review Committee through most of the remediation study, I assert that the Focus Feasibility Study is inadequate, erroneous and predicated on faulty assumptions. This premise stems from a failure to employ the scientific method in developing a master plan of study which took advantage of statistics. The testing program appears to be a randomly developed and orchestrated operation without a clear road map.

The lack of a master statistical methodology for testing prevents the Navy from determining, with any degree of confidence, that there was a significant and correlative sampling of pollution. At this time, neither the contractors nor the Navy can, with any degree of assurance, quantitatively assess and evaluate the statistical significance and correlation of the actual data relative to a theoretical sampling plan. For example, are the samples of data within the 95 percent or 99 percent confidence levels? Are the data part of normal, lognormal or weibull distributions? Were the sample sizes adequate for statistical significance? Does the data correlate?

Based on the above, it is virtually impossible to determine whether the conclusions used for establishing the remediation measures are valid. In other words, if the conclusions were different would it result in different remediation measures. If the answer is yes, then the Navy needs to assess the acquired data from the standpoint of statistical adequacy and meaningfulness. If the answer is no, then the issue is moot at this time; however, future

remediation efforts should be based on statistical sampling techniques, only.

The above comments represent yet another example of the sheer waste of energy and taxpayer funds for an inefficiently, ineffectively and haphazardly developed program. The blame for this debacle of incompetency clearly rests at the feet of the contracting officers and the Navy. The cost of this program is outrageous for the illogic of its reasoning process. The result of this letter, unfortunately, will be a mere "shrug-of-the-shoulders" and "ho-hum" by all involved. An inspector-general investigation of the process is definitely warranted.

Very truly yours



Robert Fromer

cc: The Day newspaper
Secretary of the Navy
Commanding Officer, NAVFAC
Commanding Officer, SUBASE, Groton