



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

November 1, 1996

Mark Evans, Remedial Project Manager  
U.S. Department of the Navy  
Naval Facilities Engineering Command  
Northern Division  
10 Industrial Highway  
Code 1823, Mail Stop 82  
Lester, PA 19113-2090

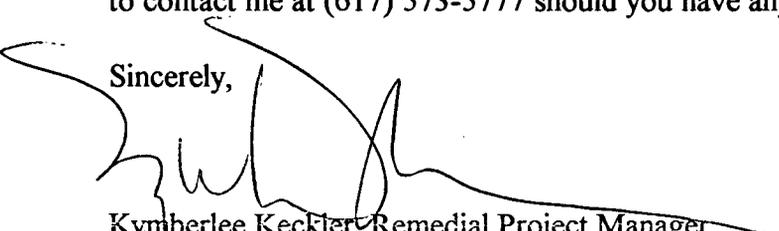
Re: Responses to EPA Comments on the *Draft Site Management Plan for the Naval Submarine Base - New London, Groton, Connecticut*

Dear Mr. Evans:

Thank you for your October 10, 1996 letter responding to EPA's August 27, 1996 letter on the *Draft Site Management Plan for the Naval Submarine Base* ("SMP"). Overall, I am pleased that the Navy agrees with the majority of EPA's comments and look forward to the revised SMP. Therefore, in the interest of brevity, I have only listed those comments requiring further discussion in Attachment A.

I look forward to discussing these issues with you on November 6, 1996. Please do not hesitate to contact me at (617) 573-5777 should you have any questions before this meeting.

Sincerely,



Kimberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT  
Andy Stackpole, NSBNL, Groton, CT  
Rayomand Bhungara, Gannett Fleming, Braintree, MA



Recycled/Recyclable  
Printed with Soy/Canola Ink on paper that  
contains at least 75% recycled fiber

## ATTACHMENT A

### Comment No.

### Discussion

General Comment  
No. 1

Although the text of the SMP will be revised and reference to the *1996 Relative Risk Evaluation Primer* will be made, terms and assumptions will not be defined in the text of the SMP. EPA requested additional explanation of the data evaluation process, or review and revision of the evaluation sheets (Appendix B). Section 4.1 Relative Risk Site Evaluation Framework does not appear to be consistent with the 1996 Relative Risk Evaluation Primer. Brief examples of the site specific data evaluation yielding ratings could help identify the assumptions used for designating the migration pathway factor and receptor factor ratings. For example, general assumptions relative to the Thames River should be consistent for all sites adjacent to the river. If inclusion of assumptions within the text of the SMP is too cumbersome or duplicative, then such assumptions should be consistently presented as part of the rationale stated on the evaluation sheets in Appendix B of the SMP.

General Comment  
No. 3

In order to address EPA's concern, specific references should be provided for comparison values in the SMP. The reference should identify the appendix within the primer and the source of the values presented in the referenced appendix.

Specific Comment  
12 - Appendix B

The comment referred to the proper use of significant figures when presenting data; 0.020 is *not* the same as 0.02. The precision of measurement is indicated by the number of figures used to record it. The digits presented in a calculation should be significant figures. These figures include all those that are known with certainty plus one more, which is an estimate. The space provided on the worksheet is four significant figures. Therefore, rounding should be to four significant figures. The comment did not question the accuracy of rounding to the hundredth; it questioned the presentation of the data. EPA commented on the inappropriate use of significant figures when rounding the ratio number. For example, 0.017, 0.019, and 0.022 are rounded to 0.020 instead of presenting them as 0.017, 0.019, and 0.022.