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LETTER REGARDING REQUEST FOR SITE-SPECIFIC SURFACE WATER PROTECTION
CRITERION FOR ETPH REMEDIAL ACTION PLANS NSB NEW LONDON CT
1/24/2014
TETRA TECH



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PITT-01-14-118

January 24, 2014

Project Number 112G03685

Mr. Mark R. Lewis
Environmental Analyst
Connecticut Department of Energy and Environmental Protection
Bureau of Water Protection and Land Reuse
Remediation Division/ Eastern District
79 Elm St.
Hartford, CT 06106-5127

Reference: CLEAN Contract No. N62470-08-D-1001
Contract Task Order WE37

Subject: Request for Site-Specific Surface Water Protection Criterion for ETPH
Remedial Action Plans
Naval Submarine Base-New London, Groton, Connecticut

Dear Mr. Lewis:

On behalf of the Navy, Tetra Tech is requesting approval of 470 µg/L as a site-specific surface water protection criterion (SSSWPC) for ETPH for Lower Subbase Zones 1 to 7. Historical use of petroleum (non-CERCLA) constituents at Naval Submarine Base-New London, Groton, Connecticut resulted in its release in certain portions of the Lower Subbase. The Navy is developing Remedial Action Plans to address the ETPH contamination and will use the SSSWPC to determine appropriate remedial strategies. This request is being made because the revised Remediation Standard Regulations that were adopted by CTDEEP in June 27, 2013 did not include a surface water protection criterion for ETPH. I discussed this issue with you on December 24, 2013 and you recommended applying for the SSSWPC.

The SSSWPC of 470 µg/L is based on the average chronic aquatic life criterion for several aromatic compounds in the C11 to C22 carbon range, multiplied by the maximum allowable 100x dilution factor. The CTDEEP previously approved the use of this dilution factor for the Lower Subbase and the Thames River. The approach for developing the alternative criteria is documented in Appendix C of the document titled "Extractable Petroleum Hydrocarbon Fractions Using the ETPH Analytical Method and Criteria Development Technical Support Document" dated July 2012. Please forward this request letter to Mr. Craig Bobrowiecki at CTDEEP for review and approval.

If you have any other questions regarding this request, please contact me at (412) 921-8984.

Sincerely,

Corey A. Rich, P.E.
New London Base Coordinator/Project Manager

c: Mr. Dominic O'Connor, NAVFAC MidLant
Ms. Tracey McKenzie, NSB-NLON
Mr. Garth Glenn, Tetra Tech – Norfolk
Administrative Record File, Tetra Tech – Pittsburgh
CTO WE37 – File Copy

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