



**STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



**BUREAU OF WATER MANAGEMENT  
PERMITTING, ENFORCEMENT & REMEDIATION DIVISION  
FEDERAL REMEDIATION PROGRAM**

February 17, 1999

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

Re: State Comments regarding Draft Report Entitled "*Evaluation of Chemical and Toxicological Data for Goss Cove, Naval Submarine Base- New London CT*"

Dear Mr. Evans:

The Department has received and reviewed the draft report entitled "*Evaluation of Chemical and Toxicological Data for Goss Cove, Naval Submarine Base- New London CT*". The plan was dated December 22, 1998, and was received by the Department on December 28, 1998.

This report evaluates the source of ecological toxicity observed in the sediments in Goss Cove. The report concludes that the toxicity does not appear to be due to contaminants leaching to the cove from the adjacent Goss Cove Landfill. The report suggests that the toxicity may instead be related to hypoxic conditions in the cove. The report suggests that installing a culvert under the railroad to connect the cove to the Thames River would increase circulation and decrease hypoxic conditions within the cove. It raises two concerns regarding this option. The first concern is that increasing oxygen levels in the cove might lead to an increase in the bioavailability of certain contaminants. The second concern is the potential for contaminated sediments to be transported to the river via the culvert.

The State agrees with the general approach used in this report, as well as with the conclusions of the report. The State shares SAICs concerns regarding the possibility that the culvert could provide a pathway for transport of contaminated sediment from the cove to the river. The State agrees that the culvert could be designed to minimize the amount of sediment transported from the cove to the river. The Navy should pay careful attention to this issue during the design process. In addition, the State feels that the risk that bioavailability of certain contaminants could increase is more than offset by the benefits of increasing circulation in the cove.

If you have any questions regarding this letter, please contact me at (860) 424-3768.

( Printed on Recycled Paper )

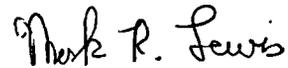
79 Elm Street • Hartford, CT 06106 - 5127

<http://dep.state.ct.us>

An Equal Opportunity Employer

*State Comments re: Goss Cove Ecological Evaluation*  
*February 17, 1999*  
*Page 2 of 2*

Sincerely,



Mark R. Lewis  
Senior Environmental Analyst  
Federal Remediation Program  
Permitting, Enforcement & Remediation Division  
Bureau of Water Management

cc: Kymberlee Keckler, US EPA New England, Federal Facilities Section  
Dick Conant, NSBNL Environmental Department  
Lee Dunbar, CTDEP, Water Management Bureau  
Greg Tracey, SAIC