



DEPARTMENT OF THE NAVY

ENGINEERING FIELD ACTIVITY, NORTHEAST
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO

5090
Code EV23\ME
June 10, 2003

Mr. Kenneth Finkelstein
National Oceanic and Atmospheric Administration
c/o EPA Office of Site Remediation and Restoration (HIO)
J.F. Kennedy Federal Building
Boston, MA 02203

Dear Mr. Finkelstein:

SUBJECT: RESPONSES TO NOAA COMMENTS OF APRIL 1, 2003 FOR THE
DRAFT THAMES RIVER RAPID SEDIMENT CHARACTERIZATION
PILOT STUDY WORK PLAN/SAMPLING PLAN, NAVAL SUBMARINE
BASE NEW LONDON, GROTON, CT

Please find attached the responses to your comments on the Draft Thames River Rapid Sediment Characterization Study Work Plan/Sampling Plan. The Final Work Plan/Sampling Plan will follow shortly under a separate cover. Also, the actual fieldwork in the Thames River is scheduled to begin June 16, 2003.

If you wish to discuss this issue further, please contact me at (610) 595-0567 extension 162.

Sincerely,

A handwritten signature in cursive script that reads "Mark Evans".

MARK EVANS
Remedial Project Manager
By direction of the
Commanding Officer

Copy to: Ms. Melissa Griffin, NSB-NLON
Mr. Donald Gunster, Batelle
Mr. Charles McLeod, EA Engineering
MS. Kymberlee, Keckler, EPA Region I
Mr. Mark Lewis, CTDEP

**National Oceanic and Atmospheric Administration
Hazardous Materials Response and Assessment Division
Response to April 2, 2003 Comments
Draft Thames River Rapid Sediment Characterization Pilot Study**

1. **NOAA is unclear what the screening level risk assessment will be based on. We assume only the sediment data collected from this effort. If there are other measures, please make note of them in the text.**

Response: NOAA is correct in assuming that only sediment data collected as part of the Pilot Study will be used for the SLERA.

2. **Section 4.1, Page 4 makes note that the sediment collected at each station will be divided into three containers. One for Rapid Sediment Characterization (RSC) and the other two sent to Battelle. One set of the Battelle samples are for a full suite of chemical analysis. But NOAA is unclear what the other Battelle set is for. Because toxicity testing is a distinct future possibility, this set of sediment samples could be used for that purpose but it is likely unwise to hold sediment for such a lengthy time.**

Response: The Navy is not planning on storing sediments for toxicity testing. Sediment in 4-oz containers will be analyzed at SPAWAR using RSC techniques. Sediment in one 16-oz container will be homogenized and aliquotted for analysis of organic compounds and trace metals. Sediment in a second 16-oz container will be analyzed for TOC and grain size. Sampling handling procedures are defined in the QAPP (Section A.3.3.1 and Table A-5).

3. **Table 2 (Page 15) discusses the past data sediment collected from Zone 4. The text states that the benzo(a)pyrene and chromium were measured at concentrations exceeding the ER-M. NOAA's review of this data from May of 1998 showed elevated sediment concentrations in several more chemicals. NOAA reports that "The highest concentrations of chromium, copper, lead, and zinc were detected in sediments of the Thames River adjacent to Zone 4 with the concentrations of all these trace elements exceeding their respective ER-M concentrations." In addition, the total PAH concentration was greater than the ER-M in Zone 4.**

Response: NOAA's review is correct. The summary of the problem statement in Table 2 will be revised to more fully describe the constituents found at elevated levels in Zone 4.