



U.S. DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Admin.

National Ocean Service
Office of Ocean Resource Conservation and Assessment
Coastal Protection and Restoration Division
c/o EPA Office of Site Remediation and Restoration (HIO)
1 Congress Street
Boston, MA 02114

9 August 2004

Ms. Kimberlee Keckler
U.S. EPA Waste Management Division
J.F. Kennedy Federal Building
Boston, MA 02203

Mr. Mark Evans
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Dear Kimberlee/Mark:

Thank-you for the Thames River Validation Study, Naval Submarine Base – New London, Groton, CT prepared by Battelle and Neptune and Company dated July 2004. Much of the report is well organized and easy to follow. The meetings held earlier in the year result in relatively few questions. Nevertheless, those are numbered below.

1. Pier 1 remains an enigma for me. My understanding was that dredging or some other aggressive remedial action was planned for the inner pier. However, Figure 3-5 shows considerable sampling within the Inner Pier zone. I am aware that the Navy must learn the boundary between the inner and outer pier (removal/isolation vs. further analysis, respectively) but 2 of 6 chemistry stations and 1 of 4 toxicity test stations (see Figure 3-5) are removed from the outer pier study. As the inner/outer pier boundary should be based on chemistry, I do not understand why the Navy plans on measuring toxicity in one sample in the inner pier (dose-response?). I suggest using funds dedicated to the EE/CA for assessment of both chemistry and toxicity in the inner pier if indeed the Navy needs that data. In fact I would like to have those two "lost" samples and add one each to Zones 4 and 7.
2. I was surprised to learn that 6 samples meet the conditions set forth by Dunnett's test. But one more sample (i.e., 7) lowers the type II error to 10% and, by definition, increases the power by 10% (Table A-4). And given my comment above, those two samples are available. I don't need to point out that it is the Type II error that the government agencies would most want to lower.
3. I was particularly interested in the ER-M quotient calculations explained in A.2.0 and shown in Figures A-1 to A-4. I assume this data came from the pilot study. But when I compared the points provided in Figure A-1 to Figure 1-2 (Zone 4), the latter had considerably more sample locations. A similar comparison for Zone 7 resulted in the same discrepancy. And I was wondering why you used only some of the data for the Figures showing the ER-M quotients?

I look forward to the start of the fieldwork and trust it promptly can begin. If you have any questions/comments, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to be 'KFC' with a long horizontal stroke extending to the right.

Kenneth Finkelstein, Ph.D.