



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Admin.
National Ocean Service
Office of Ocean Resource Conservation and Assessment
Hazardous Materials Response and Assessment Division
c/o EPA Office of Site Remediation and Restoration (HIO)
J.F. Kennedy Federal Building
Boston, MA 02203
12 August 1997

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 Existing Data Summary Report for the Lower Subbase Remedial Investigation, dated March 1997 and the Draft Final Workplan and Sampling and Analysis Plan dated July 3 1997, Naval Submarine Base New London. I apologize for the late review of these documents. In March, I briefly reviewed the former document and provided verbal support to the direction the Navy and EPA were taking in the Lower Subbase studies. This letter provides a few comments/questions but should not delay the start of the field sampling.

Previously, NOAA made note of the high concentrations of lead and PAHs found in the catch basin system at Pier 33 (Zone #5). The Navy agrees that Lower Subbase studies should include both this storm sewer and its discharge into the Thames River. But according to the Pier 33 SI, the high lead concentration in the storm sewer at SD-1 flows toward SD-2 which showed much lower lead and PAH concentrations. However, Figure 7-1 in the Existing Data Summary Report shows that storm water moves past SD-1 directly into the Thames river about 50 feet to the west. Please explain. Nevertheless, SW/SD3-5RI should take into consideration the discharge flow moving past SD-1.

NOAA agrees with the two comments provided by Kimberlee Keckler of the EPA on 28 July 1997 concerning the need to "include a provision for sediment toxicity testing if contaminant concentrations exceed ER-M values" and the request for a "tiered approach to surface water sampling, sediment sampling, and shellfish cage studies." I trust these additions are included in the final Work Plan.

Lastly, as discussed during our meeting on 6 August 1997, the Lower Subbase Workplan will include sediment sampling at the Area A Downstream watercourse discharge locations. Results of these sample analyses will follow the provisions discussed above.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "K Finkelstein".

Kenneth Finkelstein, Ph.D.

cc: Patti Tyler (EPA)