

MEMORANDUM

August 12, 2005

To: Chairman Principi

Cc: Commissioner Bilbray
Commissioner Coyle
Commissioner Gehman
Commissioner Hansen
Commissioner Hill
Commissioner Newton
Commissioner Skinner
Commissioner Turner

From: Governor Jodi Rell
Senator Chris Dodd
Senator Joseph Lieberman
Representative Rob Simmons

Re: Environmental Remediation at Naval Submarine Base New London

We hope you will consider the following points in light of testimony delivered at yesterday's hearing, "Environmental Stewardship of Installations Recommended for Closure or Realignment":

- The witnesses' vague and unresponsive testimony underscores Department of Defense uncertainty about the cost of cleanup at SUBASE New London. This is understandable because DOD's estimate is based upon a small percentage of the base's environmental problems.
- The witnesses' admission that they could not yet determine whether cleanup costs would be \$23 million, \$30 million, or \$40 million, or some other number, brings into serious question their current cost estimate.
- We agree with your comment yesterday that, "\$23 million doesn't seem like an awful lot of money" to clean up SUBASE New London's superfund sites. In fact, SUBASE New London has 26 individual sites included under the Superfund program.
- The \$23 million figure does not achieve remediation largely because it is silent on more than 100 Underground Storage Tank (UST) and Resource Conservation and Recovery Act (RCRA) [hazardous waste] sites.
- Connecticut has identified \$125 million worth of work to properly prepare the base for transfer and re-use that the Navy excluded from its COBRA analysis

- For example, DOD's radiological cost estimates are extremely low given required protocols for performing radiological assessments and surveys. Connecticut provided evidence to the BRAC Commission that the true radiological remediation cost is at least \$31.5 million.
- Please note a letter by the U.S. Environmental Protection Agency – delivered to your office yesterday – confirming that a special 1994 Federal Facility Agreement between the Navy, the State of Connecticut, and EPA remains in effect. The agreement requires cleanup before any transfer of the Navy property.
- We believe these facts amount to evidence of substantial deviation to BRAC criterion five, cost.

/s/

Governor M. Jodi Rell

/s/

Senator Christopher Dodd

/s/

Senator Joseph Lieberman

/s/

Representative Rob Simmons