



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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August 9, 1993

Ms. Deborah Carlson
Remedial Project Manager
Department of the Navy/Northern Division
Naval Facilities Engineering Command
10 Industrial Highway Mail Stop # 82
Lester, PA 19113-2090

Re: Draft Media Protection Standards Proposal, Portsmouth
Naval Shipyard, Kittery, Maine

Dear Ms. Carlson:

The Department has received and reviewed the Draft Media Protection Standards Proposal (MPSP), Portsmouth Naval Shipyard, Kittery, Maine. I am confident that the Department's comments will be incorporated into the revised MPSP to be submitted to EPA by the Navy by September 6, 1993.

The Department's comments are provided below.

General Comments

1. These comments do not include a review of the Offshore Human Health Risk Assessment, received by the Department on July 22, 1993. A review of the Offshore Human Health Risk Assessment Report may impact MPS decisions concerning groundwater, surface water, and sediment.
2. The Navy has collected additional background samples to improve the database for use in setting Media Protection Standards. Please provide the Department with a copy of the additional background sampling data.

Specific Comments

3. Page 1, Section 1.0, Introduction
It is not clear what is meant by the sentence, "This document is the first step in the process and proposes cleanup goals." Please clarify or rewrite this statement.
4. Page 1, Section 3.0, first sentence

Include "site-specific background conditions" after the word "to" in this sentence. Regional background levels may be considered for comparison purposes, but site-specific background levels are the levels that should be used to establish background concentrations.

5. Page 1, Section 3.0, #1

Please include "and MEDEP" after the word "USEPA" in this sentence.

6. Page 1, Section 3.0, #2

Why are regional background concentrations of contaminants included and site-specific background concentrations are not included?

7. Page 2, paragraph 2

After the first sentence in this paragraph include, "The State of Maine's Incremental Lifetime Cancer Risk Guideline is 1×10^{-5} ".

8. A risk goal of 10^{-4} for occupational exposures exceeds Maine's Risk Guideline. EPA has stated that a point of departure of 10^{-6} must be used for all exposures.

9. Page 2, paragraph 4

Is there a reference available for the OSHA work place standards referenced in this paragraph? If so, a specific document should be cited, if not, the reference should be removed.

10. Page 2, paragraph 5

I'm not sure what EPA Headquarters is advising, but EPA Region 1 requires that maximum analyte concentrations be used for risk estimates.

11. Page 2, paragraph 6

Since Portsmouth Naval Shipyard is possibly weeks away from an NPL designation, you may want to consider removing the second sentence. I disagree that it would be unlikely that "areas of high contamination" would exist and go undiscovered at Portsmouth Naval Shipyard. Maximum risk estimates must be discussed in relationship to USEPA's acceptable risk goals, in addition to being presented in the data tables.

12. Page 5, first paragraph

A risk goal of 10^{-6} should be applied for all exposure scenarios, including occupational scenarios. The USEPA recommended cleanup level for total lead in soil is 500-1,000 ppm. However, this interim soil cleanup level is being revised to account for contribution of other media to total lead exposure. Please provide a reference for the

USEPA guidance that states that the cleanup level for total lead in soils for industrial settings is 1000 ppm.

13. Table 3-2

Please include Maximum concentrations are not included on this Table.

14. Page 8, first paragraph

The Department does not believe that enough background samples have been taken and questions the location of some of the background locations that were chosen. I know that McClaren/Hart did some additional sampling, but I don't know the status of that sampling.

15. Why are the results from the background sampling largely qualitative? Data Quality Objectives for background sampling are very different from detection monitoring sampling. Data Quality Objectives must be set prior to sampling, data not meeting those objectives must be identified and discarded.

16. Page 8, third paragraph

The results of the regional background samples are useful for a rough comparison only. The regional samples may or may not represent the same geologic conditions that exist at the Shipyard.

17. Page 15, Table 3-5

Revise this table to include the State of Maine Private Water Supplies Maximum Exposure Guidelines (MEG), revised September 1992.

18. Page 13, Section 3.2.2

The MEG can be enforced as drinking water standards, and should be incorporated into this document. The MEGs are MEDEP's cleanup standards.

19. Page 13, Section 3.2.2, fourth paragraph

The logic presented in this paragraph is incorrect: If a contaminant imposes a risk below the MCL or MEG, the cleanup standard or Media Protection Standard can be set below the MCL or MEG.

20. Page 13, Section 3.2.2, fifth paragraph

Please expand on the argument for not setting Media Protection Standards for arsenic or copper. If the risk goal is exceeded, a Media Protection Standard (MPS) must be set. Why are MCLs part of this discussion? Because no source has been found for antimony does not eliminate the need for a MPS.

21. Page 22, first paragraph

It was the Department's understanding that only unfiltered groundwater samples were acceptable. It is not appropriate to dismiss data based on whether the sample collected was filtered or unfiltered. The conclusions offered in the last sentence of this paragraph must be changed.

22. Page 22, Section 3.3.1

The Department's Guidelines for Human Health Risk Assessments require that a residential scenario be performed in all cases, although recreational and occupational scenarios can be performed for comparison. The MEDEP's risk goal of 1×10^{-5} applies to all scenarios.

23. Please consider rewriting the statement, "The source of airborne arsenic is likely to be windborne soil particles at the DRMO. Arsenic concentrations found in site soils appear to represent regional background conditions, and therefore, a remedial media protection standard for arsenic in air is not required." To propose that no MPS be calculated for arsenic based on an assumption of the source is not acceptable. Comparing the level of arsenic to regional background levels is inappropriate. A MPS for arsenic must be calculated.

24. Page 22, Section 3.3.1

The word "upward" should be changed to "upwind" in the fifth sentence.

25. Section 3.4.1

Site-specific background levels should be used when assessing risk.

Sincerely,

Nancy Beardsley

Nancy Beardsley
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