



DEPARTMENT OF THE NAVY
PORTSMOUTH NAVAL SHIPYARD
PORTSMOUTH, N. H. 03804-5000

IN REPLY REFER TO:

June 24, 1998

MEMORANDUM

FOR THE MEMBERS OF THE RESTORATION ADVISORY BOARD (RAB) CERCLA REMEDIAL ACTION PROGRAM, PORTSMOUTH NAVAL SHIPYARD, KITTERY, MAINE

On behalf of the Seacoast Anti-Pollution League (SAPL), the Navy is forwarding comments on the Process for Development of Off-Shore Preliminary Remediation Goals for your information. They were prepared for SAPL by their Technical Assistance Grant advisor, Lepage Environmental Services, Inc.

If you have any questions regarding these comments, they may be asked at a RAB meeting, by calling Lepage Environmental services at (207) 777-1049 or by writing to:

Lepage Environmental Services
P.O. Box 1195
Auburn, ME 04211-1195

Sincerely,

A handwritten signature in cursive script that reads "Ken".

Ken Plaisted
Navy Co-Chairman
Restoration Advisory Board

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Lepage Environmental Services, Inc.

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June 18, 1998

Peter Vandermark
Seacoast Anti-Pollution League
P. O. Box 1136
Portsmouth, New Hampshire 03802

Subject: Review of Process for Development of Offshore Preliminary Remediation Goals

Dear Mr. Vandermark:

As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the Navy's Process for Development of Offshore Preliminary Remediation Goals (PRGs), as presented at the May 21, 1998, technical meeting in Kittery. The comments provided below incorporate Dr. David Brown's initial thoughts on the process.

1. The comments provided in this letter are based on the written materials provided at the May meeting and our interpretation of the verbal presentation by the Navy's consultant. Some of our interpretations and assumptions may be incorrect. It is our understanding that the Navy will be providing more detailed documentation of their PRG approach in the future. We are likely to have additional comments at that time.
2. The objectives as stated are satisfactory. The general process seems fairly complex, and it may be possible to simplify a bit, for example, in PRG Derivation Steps 3 and 4.
3. Terms are used which may have regulatory importance in the future (example: "majority of site-related actionable risks", or "actionable chemical risks"). Terms should be defined.
4. State of Maine health advisories pertaining to fish consumption should be included in the development of PRGs for human health. In no case should the PRGs for human health derived in Phase 1 exceed State or Federal guidance. Food consumption practices should not be used to derive numbers that differ from the State or Federal numbers.
5. In the "implementation" phase, would a calculated risk be dropped if the ecological risk assessment did not show a change in the biota or sediment? Bioaccumulation and background should be considered for metals and some organics.
6. Is there, or will there be, a provision to review (and possibly revise) the PRGs as more monitoring data becomes available for those with inadequate sample sizes?

7. Additional information concerning the polygons on Figures 3, 4, and 5 should be provided. How were they calculated and what do they mean for sediment and pore water samples?
8. Has an approach incorporating benzo(a)pyrene equivalents for materials lacking water quality criteria (see Table 1) been considered?
9. In Table 2, it is not clear how the 95% upper confidence limit (UCL PW-HQ) affects the no observable effects quotient (NOEQ). Please define with an example. It seems that the lower confidence limit would be more conservative, and the average more practical. Please clarify. In addition, does the NOEQ account or correct for bioavailability? Water quality screening values (WQSV) are values below which there is no concern. This procedure suggests that higher values can be used to screen PRGs because of bioavailability. This may be too non-conservative in the case of the sum of PAHs, as shown on Tables 3 and 4, where the value increased from 2.35 to 481.
10. Statistical considerations indicate that contaminants of concern of plausible but uncertain risk should also be retained.

If you have any questions regarding the comments above, please give me a call at 207-777-1049.

Sincerely,



Carolyn A. Lepage, C.G.
President



Enc.

cc: Iver McLeod, Department of Environmental Protection
Meghan Cassidy, Environmental Protection Agency
David Brown, Sc.D.
✓ Marty Raymond, Portsmouth Naval Shipyard