



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

IN REPLY REFER TO:

August 5, 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 SAPL's Review of Responses to Comments on Responses to Comments on the *Standard Operating Procedures Manual* 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 "Marty Raymond for".

Ken Plaisted
Navy Co-Chairman
Restoration Advisory Board

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cc: File 7090, CTO256

Lepage Environmental Services, Inc.

P. O. Box 1195 • Auburn, Maine 04211-1195 • 207-777-1049 • Fax: 207-777-1370

July 31, 1998

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

Subject: Review of Responses to Comments on Responses to Comments on the *Standard Operating Procedures Manual*

Dear Mr. Vandermark:

We are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the Navy's June 3, 1998, responses to our letter dated December 12, 1997. Our December 1997 letter provided comments on the Navy's October 22, 1997, responses to earlier comments on the *Standard Operating Procedures Manual* (the SOP Manual). The SOP Manual, which was prepared by Brown and Root Environmental and released in November 1996, is a compilation of the procedures commonly used in environmental investigations at Portsmouth Naval Shipyard. The Navy responded to the first round of comments from the Maine Department of Environmental Protection (DEP) and the U. S. Environmental Protection Agency (EPA) on the SOP Manual in the October 1997 letter. Our December 12, 1997 letter includes comments on the Navy's October responses as well as additional questions and issues resulting from our own review of the SOP Manual.

Most of our December 12, 1997, comments were addressed satisfactorily in the Navy's June 3, 1998 letter. The outstanding comments and questions are as follows:

1. Forward. We had asked about the process and timing for updating the SOPs and distributing revised SOPs, suggesting the information should be outlined in the Forward. While the response to this comment provided the information requested, there was no mention of including the information in the Forward. We still think it is appropriate to incorporate this information in the Forward.

The Navy's October 1997 response to EPA's 12th comment mentions an SOP Manual update of December 1997. While we received revisions to a number of SOPs as attachments to the October 1997 responses, we do not have any new or revised SOPs in our files dated December 1997. The Navy should provide a list of which SOPs have been revised (and when the revisions occurred) since the SOP Manual was issued in November 1996. We will then be able to determine what information we are missing and can request copies from the Navy.

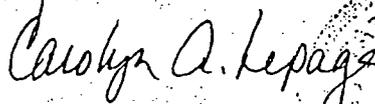
2. GH-1.2 Evaluation of Existing Monitoring Wells and Water Level Measurement. We had asked a number of questions relating to the measurement of water levels in wells. We feel the Navy's responses are important enough to warrant being added to the SOP Manual to ensure that, regardless of personnel changes, everyone making water level measurements is making them from the same point at a given well. It is also important that the reference level for each well be established before the first round of measurements is made.

3. GH-1.3 Soil and Rock Drilling Methods. In response to our questions regarding borehole abandonment procedures, the Navy provided an SOP attached to their June 3, 1998 response to comments letter. It appears that this attachment lists revisions to SOP GH-2.9. We do not have an SOP GH-2.9 in our copy of the November 1996 SOP Manual. We would appreciate receiving a copy of SOP GH-2.9 from the Navy.

4. SA-7.1 Decontamination of Waste Equipment and Waste Handling. The Navy's response to our comment about dealing with soil cuttings having contaminants that aren't visible or that don't provoke a response by the field screening instruments is important enough that we feel it should be added to the SOP. While we agree that site-specific planning is best left to the site-specific work plan, we also feel that the SOP Manual should address how cuttings contaminated by non-volatile compounds and/or constituents that are not readily visible will be handled.

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
Marty Raymond, Portsmouth Naval Shipyard