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NSY PORTSMOUTH  
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT PROPOSED  
REMEDIAL ACTION PLAN FOR OPERABLE UNIT 2 (OU 2) NSY PORTSMOUTH ME  
05/18/2011  
U S EPA REGION I



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
NEW ENGLAND - REGION I  
1 CONGRESS STREET, SUITE 1100 (HBT)  
BOSTON, MASSACHUSETTS 02114-2023

May 18, 2011

Linda L. Cole, P.E.  
NAVFAC Mid-Atlantic  
9742 Maryland Ave  
Bldg Z-144, 1st Floor  
Norfolk, VA 23511

Re: **EPA comments on Draft OU2 Proposed Remedial Action Plan, Portsmouth Naval Shipyard, Kittery, Maine**

Dear Ms. Cole:

I have reviewed the subject document provided by the Navy and have the attached comments.

If you have any questions, please feel free to contact me at [audet.matthew@epa.gov](mailto:audet.matthew@epa.gov) or 617.918.1449.

Sincerely,

A handwritten signature in blue ink that reads "Matthew R. Audet." The signature is written in a cursive style.

Matthew R. Audet, P.G.  
Remedial Project Manager  
Office of Site Remediation and Restoration

cc. Iver McLeod/ME DEP  
Deb Cohen/Tetra Tech NUS  
RAB Members

**Attachment 1**  
**US EPA Comments on Draft OU2 Proposed Remedial Action Plan**  
**Portsmouth Naval Shipyard**

1. A significant discussion and evaluation, consistent with the DRMO and Waste Disposal Area, must be included for the DRMO Impact Area. While *no-further action* is appropriate for this sub-area of OU2 based on prior removal actions, this does not mean that the Impact Area can be overlooked. The NFA alternative must be included and evaluated in the PRAP (and ROD) as it is an equal and major component of the OU2 remedy.
2. Throughout: The phrase “NFA is required” appears in several places and is difficult for an average person to parse, since it seems to imply that “NFA” *is required*, whereas the real meaning is that “FA” *is not required*. Given the importance of the point, spell out in full, either as “no further action is required” or “further action is not required.”
3. Page 1, “The Cleanup Proposal”: Mention somewhere in text box that EPA concurs with proposal.
4. Page 6, column 1, 5th full paragraph: The sentence “It is the current judgment of the Navy and EPA, in consultation with MEDEP, that *the Preferred Alternative is necessary to protect public health and welfare* from actual or threatened releases of these hazardous substances into the environment” is overstated and perhaps misleading. EPA’s judgment is that *active remediation combined with LUCs and monitoring* is necessary to protect public health and welfare, but that could include not just WDA-3 and DRMO-4 but also WDA-4 and DRMO-3, which the Navy is proposing not to choose based on cost and implementability grounds. A more accurate statement would be something like: “It is the current judgment of the Navy and EPA, in consultation with MEDEP, that removal of contaminated soil, combined with LUCs and monitoring, is necessary to protect public health and welfare from actual or threatened releases of these hazardous substances into the environment, and that the Preferred Alternative is an appropriate remedial alternative for this purpose.”
5. Page 8, column 1, 1st paragraph: In discussion of DRMO-4 LUCs, note that the LUCs preventing residential development would continue in force even if the property were at some future date transferred out of Navy control. This is an important point because DRMO-4’s protectiveness relies in part on the property not being used for residential purposes.

6. Page 13, column 1, 1st paragraph: In discussion of five-year review, note that the five-year review requirement would continue even if the property were at some future date transferred out of Navy control.
7. Please explain or replace the following terms: dermal, predominately, carcinogen, non-carcinogenic, bench-scale, slag.
8. Please add email as a submittal option.
9. Glossary terms should be bolded in the text body.
10. Where possible increase the font size of the figure text. Eliminate unnecessary clutter from figures.