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LETTER AND COMMENTS ON BEHALF OF SEACOAST ANTI POLLUTION LEAGUE
REGARDING INITIAL CONTAMINANTS OF CONCERN EVALUATION IN SUPPORT OF
PHASE 1 MODELING EFFORT NSY PORTSMOUTH ME
12/31/1996
LEPAGE ENVIRONMENTAL SERVICES

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December 31, 1996

Ms. Marty Raymond
Portsmouth Naval Shipyard
Code 106.3R Bldg. 44
Portsmouth, New Hampshire 03804-5000

Subject: Review Comments, *Initial Contaminants of Concern Evaluation in Support of Phase I Modeling Effort*

Dear Ms. Raymond:

As requested by Peter Vandermark of the Seacoast Anti-Pollution League (SAPL), we are transmitting comments concerning the December 1996 document *Initial Contaminants of Concern Evaluation in Support of Phase I Modeling Effort*. The document was prepared by Brown & Root Environmental as part of the on-shore/off-shore contaminant fate and transport modeling task, and describes the screening process and results.

We provide the following questions and concerns in addition to the enclosed comments prepared by Charles Hebson and Andrews Tolman of Gerber-Jacques Whitford:

- 1. General Comment.** We reiterate Dr. Hebson's comment in his November 22, 1996, letter concerning the *Phase I Ground Water Modeling Work Plan*, that, while modeling can be a useful tool, characterization of the site and related marine environments is best made utilizing actual data. As additional monitoring data is gathered, how will the results of this initial contaminants of concern (COC) evaluation be revised? How will a "new" COC be dealt with?
- 2. Page 2.** While it appears that remediation of an operational unit may be warranted should all 15 COCs appear to have a potential impact to the off-shore, it is not clear what might happen if half, or only one, of the contaminants of concern are detected.
- 3. Page 3.** The statement is made that "using the existing groundwater data in the Phase I Model screening is [believed to be] conservative since the high turbidity should cause the groundwater concentrations to be estimated high". This implies that turbidity is the only factor affecting the representativeness of a groundwater sample. Other sampling-related issues, such as dewatering the well screen or agitating/aerating the water in the well bore may also have a significant effect on water chemistry results, particularly for some volatile organic compounds.

4. **Page 9.** With regard to frequency of detection as a criteria, is the available database extensive enough for this to be valid statistically? That is, have the various wells been sampled often enough for a given parameter to determine what constitutes "frequent" detection?

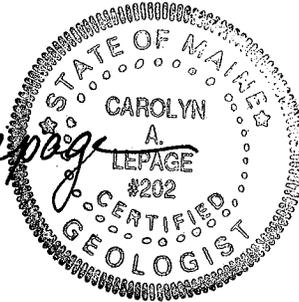
5. **Table 1, Table 3.** Given the extremely short amount of time available for us to review the COC document, we have not checked the parameters or values in the tables for accuracy or appropriateness. However, we did note that the partitioning coefficients used in screening potassium at Operable Unit 2 (Table 1), and aluminum and sodium at Operable Unit 3 (Table 3) were not the lower of the two values listed for each. Does this have a significant impact on the screening results?

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

Sincerely,



Carolyn A. Lepage, C.G.
President



Enc.

cc. Peter Vandermark, SAPL