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LETTER AND COMMENTS REGARDING DRAFT SITE SCREENING PROCESS PLAN NSY
PORTSMOUTH ME
6/26/1997
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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June 26, 1997

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

Subject: Review Comments, Draft *Site Screening Process Plan*

Dear Mr. Vandermark:

As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the Draft *Site Screening Process Plan* (the plan) dated May 1997. The report was prepared by Brown & Root Environmental to outline the mechanism for providing preliminary information about a site to determine if further action is necessary. The plan describes the process for determining whether storage, release, or disposal of hazardous substances may have occurred. Based on the results of the site screening, possible future action could be a Remedial Investigation/Feasibility Study, a Removal Action, or no further action.

An earlier version of the plan had been reviewed by the U.S. Environmental Protection Agency (U.S. EPA), and the Maine Department of Environmental Protection (MEDEP). The Navy's response to comments on that draft are included in the appendix of the current document, and are also reflected in revisions to the report text. We did not review the previous draft. Our comments on the current draft are as follows:

1. **Page 1, Section 1.0.** The development of a work plan that addresses the sampling and analysis strategy should be incorporated into the tasks listed at the end of the section.
2. **Page 1, Section 2.0.** We are uncertain if the "figures" mentioned in the second paragraph are artistic (such as paintings, etc.), or numerical. Please clarify.
3. **Page 2, Section 2.0.** Observations during the site visit should also include stressed vegetation and waste handling procedures and areas. In addition, the fourth bullet should include hazardous chemicals or petroleum products that are used, not just stored, at the site.
4. **Page 2, Section 2.0.** The potential documents for review should include a variety of site plans and maps, not just site utility plans. In addition, information relating to any previous investigations must also be reviewed.

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5. **Page 4, Section 3.0.** The third paragraph on the page implies that soil samples will only be collected from test pits, and not from borings. Please clarify.

6. **Page 9, Section 6.0.** In addition to the bulleted items to be included in the *Site Screening Process Plan*, the data generated during the investigation must be presented.

7. **Page 11, Section 6.0.** Under the first bulleted item in recommendation 3.a, please clarify what "unacceptable levels" of soil contaminants in groundwater would be.

8. **Page 13, Section 6.0.** It is helpful to see the assumptions used in developing the preceding recommendations spelled out. However, the lack of detections in groundwater of contaminants found in soil, as well as the assumption that groundwater concentrations will not increase over time, should be approached with caution. The unwritten assumptions in this section include that the monitoring wells are properly located and installed, and will not "miss" contamination. Also, that sampling and/or analysis is properly conducted. Furthermore, that chemical conditions in the subsurface (such as pH) will not change in the future, such that metals or other contaminants that had become bound to soil or otherwise immobilized are remobilized.

General Comment. With all the acronyms being used in this document, it would be helpful to have a glossary. Once created, it could be used as "boilerplate" in other documents.

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

Sincerely,

Carolyn A. Lepage

Carolyn A. Lepage, C.G.
President



cc: Iver McLeod, MEDEP
Meghan Cassidy, U.S. EPA