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NSY PORTSMOUTH  
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LETTER AND U S NAVY RESPONSE TO MAINE DEPARTMENT OF ENVIRONMENTAL  
PROTECTION COMMENTS REGARDING DRAFT WORK PLAN FOR SITES 10 AND 29 NSY  
PORTSMOUTH ME  
12/17/1997  
BROWN & ROOT ENVIRONMENTAL



# Brown & Root Environmental

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C-49-12-7-148

December 17, 1997

Ms. Meghan Cassidy  
Environmental Protection Agency  
Region I (HAN CAN 1)  
90 Canal Street  
Boston, MA 02114

Mr. Iver McLeod  
Maine Department of Environmental Protection  
State House Station 17  
Augusta, ME 04333-0017

Subject: SITES 10/29 DRAFT WORK PLAN  
FOR THE INSTALLATION RESTORATION PROGRAM  
PORTSMOUTH NAVAL SHIPYARD, KITTERY, ME

Dear Ms. Cassidy/Mr. McLeod:

On behalf of the U. S. Navy, Brown & Root Environmental (B&R Environmental) is pleased to submit to the U. S. Environmental Protection Agency Region I (USEPA) and to the Maine Department of Environmental Protection (MEDEP) the Navy's response to the MEDEP's comments on the Sites 10/29 Draft Work Plan for the Portsmouth Naval Shipyard. The Navy would like to extend an apology for the delay in responding to the MEDEP's comments. The Sites 10/29 Draft Final Work Plan has already been issued, however, the MEDEP's comments will be incorporated into the Sites 10/29 Final Work Plan as noted in the attached responses.

B&R Environmental had requested comments on the Sites 10/29 Draft Final Work Plan by December 4, 1997. To date, no comments have been received from the MEDEP. Please inform the Navy if and when comments will be forthcoming.

For the Community Restoration Advisory Board (RAB) members; if you have any comments or questions, they can be provided to the Navy at a RAB meeting, by calling the Public Affairs Office at (207) 438-1140 or by writing to:

Portsmouth Naval Shipyard  
Code 106.3R Bldg 44  
Attn. Marty Raymond  
Portsmouth, NH 03804-5000

If additional information is required, please contact Mr. Fred Evans at (610) 595-0567 ext. 159 or Ms. Marty Raymond at (207) 438-2536.

Sincerely,

Mark L. Mengel  
Project Manager

Attachment



Subject: SITES 10/29 DRAFT WORK PLAN  
FOR THE INSTALLATION RESTORATION PROGRAM  
PORTSMOUTH NAVAL SHIPYARD, KITTERY, ME

Distribution:

NORTHDIV, (Code 1823/FE, F. Evans)  
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Brown & Root Environmental (B. Horne)  
Mr. Doug Bogen  
Ms. Michele Dionne  
Ms. Mary Marshall  
Mr. Jack McKenna  
Mr. Onil Roy  
Ms. Carolyn Lepage

**MEDEP COMMENTS DATED AUGUST 19, 1997  
ON THE NAVY'S RESPONSE TO COMMENTS  
DRAFT SITE 10 AND 29 WORK PLAN  
PORTSMOUTH NAVAL SHIPYARD**

**SPECIFIC COMMENTS**

1. **Comment:** Response 6, Comment: 3.2 Field Activities, p. 3-6, para 6

Please refer to the table attached to this memo and specifically to Boring DSB-8B. Review of sample descriptions and analytical data associated with this boring log indicate that contamination associated with dumping of incinerator debris, e.g., black sand, metal fragments, wire, extends below the water table to a depth of approximately 40 feet below ground surface. The dumping of this debris is directly related to "previous activities which took place at the site". In addition, according to the water table levels presented in the RFI Data Gap Report, the water level in this boring is approximately 15 feet below ground surface at low tide, well above the lower limit of incinerator-related debris.

The Navy has provided no justification for limiting subsurface soil contamination characterization to the area above the water table. In the interest of characterizing the vertical and horizontal extent of contamination at the site, subsurface soils below the water table and to refusal must be sampled and submitted for laboratory analyses.

**Response:** The Navy will collect subsurface soil samples below the groundwater table at five foot intervals for lithology to the bottom of each boring/well that is drilled, as already described in Section 4.0 of the Work Plan. As part of this activity, each split spoon sample will be monitored with a Photoionization Detector (PID). The sample which provides the highest PID readings in samples collected below the water table will be collected and delivered to the laboratory for chemical analysis. If the PID indicates no contamination, a sample will be collected based upon visual observations.

2. **Comment:** Response 9, Comment: 4.1.1 Subsurface Soil Boring and Monitoring Well Drilling, p. 4-1& 4-2

Please see MEDEP response to Navy response to comment 6.

**Response:** Please see our response to follow-up response to comment no. 6 above.