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LETTER AND COMMENTS ON BEHALF OF SEACOAST ANTI POLLUTION LEAGUE  
REGARDING DRAFT FACILITY BACKGROUND DEVELOPMENT NSY PORTSMOUTH ME  
2/25/1999  
LEPAGE ENVIRONMENTAL SERVICES

# Lepage Environmental Services, Inc.

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February 25, 1999

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

Subject: Review of *Draft Facility Background Development*

Dear Mr. Vandermark:

As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the Navy's *Draft Facility Background Development*. The document was prepared by Tetra Tech NUS, Inc., and is dated January 1999. Our comments are as follows:

- 1. General Comment.** Neither the Executive Summary nor the Introduction in Section 1.1 state why the background datasets were developed. The purpose and application of these datasets must be clearly defined in the text. Having just completed our review of the *Draft Revised OU3 Risk Assessment*, we know the datasets were developed to support the risk assessment. That information should be included up front in the *Draft Facility Background Development*. Furthermore, if these datasets are to be used for any other purpose, that too must be presented.
- 2. ES-1, Executive Summary.** The numbers of wells presented in the fourth paragraph are confusing. It appears that data from a total of six wells (four freshwater and two saline) were considered. This paragraph should be revised.
- 3. Page 2-1, Section 2.0, Evaluation of Background Soil Datasets.** The paragraph below the two bullets states that samples demonstrating obvious contamination were not selected for a background dataset. However, collecting background samples in an industrial area at a Superfund Site is likely to result in "background" concentrations that are elevated. Using elevated "background" conditions as the basis for comparison or risk calculation will have the effect of down-playing or minimizing risks at contaminated sites.
- 4. Page 3-1, Section 3.0, Evaluation of Background Groundwater Dataset.** The rationale for selecting the six wells as background locations must be presented. The general criteria were outlined in, and an "initial hydrogeology assessment" (which didn't include saline/brackish wells) attached to, the November 1998 *Procedure for the Evaluation of Potential Background Soil and Groundwater Data Sets* Technical Memorandum. The final selection process should be described in the *Draft Facility Background Development* document, including the rationale for selecting only bedrock wells.

**5. Page 3-2, Section 3.1, Evaluation of the Freshwater Groundwater Dataset.** The second bullet on page 3-2 states that diesel-range and/or gasoline-range organics (DRO, GRO) were detected in half of the background samples for freshwater wells. The maximum concentration for DRO was four times the State of Maine Maximum Exposure Guideline (MEG), and the maximum gasoline-range concentration was just below the MEG. These concentrations are indicative of environmental contamination. What is the rationale for using data from wells with significant levels of contamination and concentrations exceeding regulatory levels? While the detections may not appear to influence the inorganic profile of the samples, as stated in the last sentence in the bullet, what is the justification for considering data from wells that appear to be contaminated, as representative of background conditions? How were the risks associated with the DRO and GRO concentrations evaluated?

**6. Page 3-3, Section 3.2, Evaluation of the Saline/Brackish Groundwater Dataset.** Six out of eight saline/brackish groundwater samples also had detections of DRO, with the maximum concentration almost four times the MEG. While the water in the wells may not be suitable for drinking, the concentrations and frequency of DRO detections indicates contamination and potential risk. What is the rationale for using data from these wells as representative of background conditions? Why are the wells "saline/brackish" in this section and "saline" elsewhere?

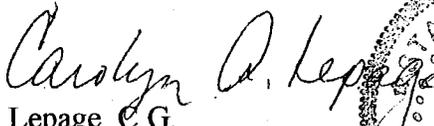
**7. Appendix B.1, Page 23, Table B-10.** Only five of the six background wells are included in Table B-10. Information regarding the sixth well must be added.

**8. Appendix B.2, Pages 20-25, Table 3-2.** Some of the numbers have been partially obliterated by the use of a highlighter prior to photocopying. A clean copy of the table should be included in the final document.

**9. Appendix B.2, Pages 63-65.** The table on page 63 and the maps on pages 64 and 65 are very difficult to read. In addition, the annotations on page 63 obliterate some of the numbers, and the page was crooked when copied, so some of the information is missing. Clean clear copies should be included in the final document.

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



cc: Iver McLeod, Department of Environmental Protection  
Meghan Cassidy, Environmental Protection Agency  
David Brown, Sc.D.  
✓ Marty Raymond, Portsmouth Naval Shipyard