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NSY PORTSMOUTH
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LETTER AND COMMENTS ON BEHALF OF SEACOAST ANTI POLLUTION LEAGUE
REGARDING DRAFT FINAL FACILITY BACKGROUND DEVELOPMENT NSY PORTSMOUTH
ME
4/26/1999
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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April 26, 1999

Johanna Lyons
Seacoast Anti-Pollution League
P. O. Box 1136
Portsmouth, New Hampshire 03802

Subject: Review of the March 2000 *Draft Final Facility Background Development*

Dear Ms. Lyons:

As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the March 2000 *Draft Final Facility Background Development*. Our comments are as follows:

1. Page ES-1. *"The type of organics detected in the background soil samples (i.e., 4,4'-DDE, 4,4'-DDT, polycyclic aromatic aromatic hydrocarbons (PAHs), petroleum hydrocarbons) are most likely attributable to current or past anthropomorphic activities (e.g., the common widespread use of fuels and pesticides not related to a given site under investigation) based on a comparison of site concentrations with those reported as anthropomorphic background in the literature."*

The meaning of this sentence is not clear. It appears that the type of compounds detected at the proposed background sites are being compared with concentrations of compounds reported at sites and in literature. It appears to be a comparison of apples and oranges as currently written. This passage should be rewritten to clearly articulate the Navy's point. In addition, references for the literature values should be cited.

2. Page ES-1. The Navy's response to SAPL's Comment Number 6, dated 2/25/99, stated that the text would be revised to use the term "saline/brackish" in place of "saline" (see the definition on page 3-1). Why wasn't the text revised here and elsewhere?

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3. Page 1-1, Section 1.1 INTRODUCTION. "As discussed in the U.S. Environmental Protection Agency (USEPA) Risk Assessment Guidance for Superfund (RAGS) Volume 1 Human Health Evaluation Manual (Part A), "Background Sampling is conducted to distinguish site-related contamination from naturally occurring or other non-site-related levels on chemicals."

This RAGS document should be added to the reference list at the end of the report. As we have stated in previously-submitted comments, we do not believe that the Navy has demonstrated that site-related contamination can be differentiated from so-called background contamination, or that the activities that caused the contamination at background locations have had similar effects at the various sites and that the results of these activities can be differentiated from site-related contamination.

4. Page 1-1, Section 1.1 INTRODUCTION. We appreciate that information regarding the purpose of the background development has been added to this section in response to SAPL's Comment Number 1, dated 2/25/99. However, this information should also be added to Executive Summary (as originally requested) as this is the section a reader is most likely to read, and the purpose for performing the work is basic information that should be included in the summary section.

5. Page 2-1, Section 2.0 EVALUATION OF BACKGROUND SOIL DATASETS. Information concerning how the urban background conditions were defined, including appropriate reference citations, should be included in this section.

6. Page 2-2, Section 2.1 EVALUATION OF THE NONFILL (NATIVE) SOIL DATASET. The first bullet discusses organic concentrations in the samples. Information, including appropriate reference citations, about the activities and resulting background concentrations in rural and urban areas that are also mentioned in the bullet should be provided.

7. Page 2-3, Section 2.2 EVALUATION OF THE FILL SOIL DATASET. The first paragraph in the section refers to Table B-7 in Appendix B for a comparison of the data with screening levels and "other relevant benchmarks". The reference citations for the "Literature Values" should be added to the end of the table. We note that several pages from the paper by Shacklette and Boerngen (*Element Concentrations in Soils and Other Surficial Materials of the Conterminous United States*) are also included in Appendix B. As we stated in our September 12, 1999 comments on the June 24th RAB Meeting minutes, we have concerns about the use of data from this reference because of limited information concerning how and where samples were collected and the lack of actual analytical results. In addition, the data presented by Shacklette and Boerngen appear to be interpolated and generalized to the point of being almost useless for comparative purposes. How are the Shacklette and Boerngen data being used in the background development?

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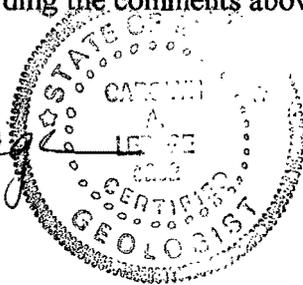
8. Page 3-2, Section 3.1 EVALUATION OF THE FRESHWATER GROUNDWATER DATASET. The second bullet states that the maximum concentrations of the diesel range and gasoline range organics are 200 ug/L and 47 ug/L, respectively. These values do not match the information presented in the table that follows the bullet. In addition, the appropriate units (ug/L?) should be added to the table.

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