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LETTER AND COMMENTS ON BEHALF OF SEACOAST ANTI POLLUTION LEAGUE ON U S
NAVY RESPONSES REGARDING GEOPHYSICAL SURVEY OF JAMAICA ISLAND AND
TOPEKA PIER LANDFILLS NSY PORTSMOUTH ME
12/10/1999
LEPAGE ENVIRONMENTAL SERVICES

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December 10, 1999

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

Subject: Review of responses to comments on the May 1999 *MTADS Geophysical Survey of the Jamaica Island and Topeka Pier Landfills at Portsmouth Naval Shipyard*

Dear Ms. Lyons:

We are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the Navy's responses to our June 30, 1999, comments on the May 1999, *MTADS Geophysical Survey of the Jamaica Island and Topeka Pier Landfills at the Portsmouth Naval Shipyard*. Responses to a number of our comments were satisfactory. Several other comments will be discussed at the December 15, 1999, technical meeting. The following comments are still outstanding. Note we have retained the original comment number from our June 30th letter.

Original Comment 4. Page 11, Section 5.2 Site 32 (Topeka Pier). “*In contrast with Site 8, this area does not have the same high signal level, nor does it show a high density of unidentified extensive burials. Many buried utility lines can be distinguished by examination of the Arc View overlays from the water, power utilities, and sewer and storm drains, Figures C3 and C4.*” There appear to be a number of areas of potential interest that do **not** match up with the GIS overlays in Appendix C. These areas appear to need additional investigation. Please clarify.

Navy Response: Please see our response to MEDEP Comment No. 4. [... The ArcView images in C3 and C4 contain only part of the utilities - other utility overlays correlate with other MTADS features. However, as noted in section 5.2 of the report there are very few features that do not correlate either with buried utilities or with visible surface features.]

Additional Comment: To prevent confusion in the future, we suggest that the final report be revised where appropriate (on Figures C3 and C4 and in the text) to clearly state that only some of the utility overlays are shown on Figures C3 and C4. In addition, we understand that the Navy is focusing on digging test pits in the Jamaica Island Landfill at this time, and not at the Topeka Pier site. However, given the likelihood that the Navy will eventually conduct subsurface investigations at Topeka Pier, it would be helpful to have copies of figures showing the correlation of MTADS features with the utility overlays **not** shown in Figures C3 and C4. These additional figures could be furnished with or separate from the final MTADS report.

Original Comment 5. Page 12, Section 6.0 TEST PITS. Why were 28 targets selected (why not 20 or 40, etc.?)? Why are there no targets located at Topeka Pier where there are some anomalies that are not associated with utilities (see comment 4, above)?

Navy Response: NRL was requested to recommend 25 locations based solely on the MTADS information by Northern Division, Naval Facilities Engineering Command. The actual location of testpits will be provided as discussed in response to EPA's Comment No. 1.

Additional Comment: We suggest that the first sentence of the Navy's response be added to the final MTADS report to clarify the issue. We also found the Navy's response to MEDEP Comment No. 7a, that spells out the Navy's assumptions in selecting 25 as the target number of test pits, to be very helpful, and suggest that that response be added to the final MTADS report as well.

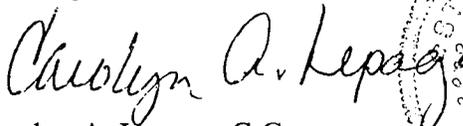
Original Northeast Geophysical Services Comments 3, 5, 6, 7, and 8. These comments focus on various aspects of the selection of targets for test pit locations.

Navy Response: Please see our response to EPA Comment No. 1. [The Navy will provide a concise summary of the proposed test pit locations with a justification why those locations are being selected ... for review and discussion prior to field work being initiated.]

Additional Comment: The Navy has very recently distributed copies of the *Draft Work Plan for Geological Services for Test Pitting at OU3*, which contains the rationale for the selection of test pit locations. This Work Plan will be discussed at the December 15th technical meeting, and we look forward to resolving any outstanding comments at that time.

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
Marty Raymond, Portsmouth Naval Shipyard
Rudy Rawcliffe, C.G., Northeast Geophysical Services