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NSY PORTSMOUTH
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LETTER REGARDING MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
OUTSTANDING ISSUES FROM RESTORATION ADVISORY BOARD MEETING NSY
PORTSMOUTH ME
3/30/2000
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

PORTSMOUTH NAVAL SHIPYARD
March 30, 2000 Restoration Advisory Board Meeting
Maine Department of Environmental Protection

ISSUES

As stated in our recent March 24 comment letter, the Maine DEP disagrees with the Navy's position that, as stated in the Navy's Response to Comments for the Draft Feasibility Study for OU3, "...remediation of groundwater for protection of offshore is not required." In addition, the MEDEP disagrees with the Navy's decision to delete Remedial Action Objective 4, which addresses impact of groundwater to the offshore.

The MEDEP believes there are still outstanding questions regarding groundwater migrating to the offshore environment via seeps. These include potential impact upon the intertidal zone biota from contaminants in seep water. In addition the MEDEP believes the Navy has yet to fully address the high levels of DDT/DDD/DDE found in seeps and sediments. Furthermore, seep dilution factors used by the Navy to compare seep concentrations to Ambient Water Quality Criteria have not yet been reviewed and approved by the MEDEP.

As a result of these disagreements the Navy, EPA and MEDEP will be participating in a technical meeting on April 4 to discuss these issues.

Despite these disagreements the MEDEP is pleased with the Navy's work in proposing/evaluating landfill covers that meet State of Maine requirements for hazardous waste landfills.

CERCLA Related Documents Reviewed/Received Since Last RAB Meeting (1/27/00):

Document	Status	Comments
Sites 10/29 Field Investigation Report	Additional comments submitted to Navy, dated Jan. 31	
Responses to Comments, Revised OU3 Risk Assessment	Comments submitted to Navy, dated Jan. 31	
Draft Seep/Sediment Summary Report	Comments submitted to Navy, dated Feb. 1	
Navy Response to MEDEP Comments, Draft OU3 Feasibility Study	Comments submitted to Navy, dated March 24	
Lab Standard Operating Procedures for MBV II and Test Pitting	Comments submitted by email to Navy on March	The MEDEP had no comments regarding the SOPs.

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Documents under review

Response to Comments on Draft Seep/Sediment Summary Report	Comments due April 18	
Response to MEDEP Follow-Up Comments on Draft Revised OU3 Risk Assessment	Comments due April 18	
Draft Final Site Screening Report - Sites 30/31/32	Comments due April 28	
OU3 Preliminary Test Pitting Package		No specific comment period however MEDEP will review
Draft Final Facility Background Development	Comments due April 26	
Draft Revised OU2 RA	Comments due May 10	

Final Documents Received

Final Field Investigation Report - Sites 10/29	Received March 29	
Final Work Plan for Mercury Burial Vault II and Drum Investigation	Received February 28	
Final Site Safety and Health Plan for Investigation and Characterization of Mercury Burial Vault II and Drum Investigation	Received February 28	

Technical Meeting to discuss alternative landfill covers: February 10

RPM meetings: March 14

RPM Conference Calls: Jan. 31, Feb. 7, Feb. 16, Feb. 28, March 27