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LETTER FORWARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
THE DRAFT SEEP/SEDIMENT SUMMARY TO RESTORATION ADVISORY BOARD NSY
PORTSMOUTH ME
4/24/2000
PORTSMOUTH NAVAL SHIPYARD



DEPARTMENT OF THE NAVY

PORTSMOUTH NAVAL SHIPYARD
PORTSMOUTH, N. H. 03804-5000

IN REPLY REFER TO.

April 24, 2000

MEMORANDUM

FOR THE MEMBERS OF THE RESTORATION ADVISORY BOARD (RAB) CERCLA REMEDIAL ACTION PROGRAM, PORTSMOUTH NAVAL SHIPYARD, KITTERY, MAINE

On behalf of the Seacoast Anti-Pollution League (SAPL), the Navy is forwarding SAPL's review of responses to comments on the *Draft Seep/Sediment Summary Report for Data Collected Between December 1996 and November 1997* for your information. They were prepared for SAPL by their Technical Assistance Grant advisor, Lepage Environmental Services, Inc.

If you have any questions regarding these comments, they may be asked at a RAB meeting, by calling Lepage Environmental Services at (207) 777-1049 or by writing to:

Lepage Environmental Services
731 Hotel Road
P.O. Box 1195
Auburn, ME 04211-1195

Sincerely,

Ken Plaisted
Navy Co-Chairman
Restoration Advisory Board

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April 21, 2000

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

Subject: Review of Responses to Comments on the *Draft Seep/Sediment Summary Report for Data Collected Between December 1996 and November 1997*

Dear Ms. Lyons:

As you requested, we are transmitting our comments on the Navy's responses to our February 2, 2000 comments on the December 1999 *Draft Seep/Sediment Summary Report for Data Collected Between December 1996 and November 1997* to the Seacoast Anti-Pollution League (SAPL). Most of the Navy's responses were acceptable. Our additional comments are as follows. Note that we have retained the original comments and comment numbers from our February 2nd letter.

SAPL Original Comment 1, Page ES-3, Status of Pesticides as COCs. "*Based on evaluation of spatial trends of pesticides...inclusion of pesticides as a COC is not warranted at this time. Because pesticide have been observed at potentially elevated levels in some offshore locations, pesticide analyses are included in the interim offshore monitoring program?*"

These statements prompt a couple of comments. The first is regarding the use of the phrase "potentially elevated levels in some offshore locations" to characterize pesticide detections. This statement is at odds with information presented elsewhere in the report, and has the effect of down-playing the concentrations of pesticides that have been documented in this and other reports. For example, on page 5-1, the first paragraph in Section 5.1 includes the statement that "...consistent exceedances for DDTs occurred at most sampling locations?". The second comment relates to the combination of the two sentences. It is not clear why pesticides should not be COCs if concentrations are sufficient to warrant additional monitoring and if pesticide levels documented to date exceed regulatory criteria. The passage in the Executive Summary and other similar portions of the report (see page 5-8, for example) should be revised to more accurately reflect what is known about pesticide concentrations and to provide a clearer justification for why pesticides should not be COCs.

Navy Response: The details of the data evaluation are provided in Section 4.0. "Potentially elevated levels" refers to concentrations above screening values. Toxicity testing will be conducted as part of Round 2 on the Interim Offshore Monitoring Program. The toxicity testing results will be used to support risk-based PRG development for sediment. The PRGs would be used to determine whether concentrations in sediment are at acceptable levels. Also, please see our response to MEDEP Comments 10 and 20.

Additional Comment: Given the explanation of the phrase "potentially elevated levels", the text should be revised, replacing the phrase with "concentrations above screening levels" to avoid further confusion. The Navy acknowledges in the response to MEDEP Comment 10 that pesticides may have been disposed, emptied, or dumped onto the Jamaica Island Landfill. Therefore, the text revision proposed in the Navy's response to MEDEP Comment 10 should state "Pesticide concentrations may be related to other PNS activities, including the disposal or legal application of the pesticides or possibly non-PNS activities." to cover this possibility.

SAPL Original Comment 8, Page 3-7, Section 3.2.1 Seep. What is the extent of the mixing zone mentioned in the last paragraph? Where should samples be collected to determine if criteria are exceeded at the end of the mixing zone?

Navy Response: The near shore mixing zone used in the modeling was derived based on the other conservative assumptions with the modeling. The near shore mixing zone (the area of initial mixing outside of the low tide line) was based on the physical geometry offshore of each of the model areas, the non-tidal velocity of the surface water offshore, and the contaminant plume return rate. The return rate takes into account the accumulation of contaminants in the near shore mixing zone from contamination which left the near shore zone with the tidal currents but is returned to the area with each successive tidal cycle. A return rate of 0.5 was assumed in the modeling based on the most conservative value (resulting in the highest concentration) from a range of typical return rates provided in USEPA guidance documents (Technical Guidance Manual for Performing Waste Load Allocations Book III: Estuaries, Part 3 Use of Mixing Zone Models in Waste Load Allocation, EPA-823-R-92-004).

The near shore mixing zone widths used in the onshore/offshore contaminant fate and transport modeling for OU3 were as follows.

Operable Unit 3 to Clark Cove 30-foot width outside the low tide line
Operable Unit 3 to Back Channel 41.5 foot width outside the low tide line

Therefore, samples for Clark Cove should be collected approximately 30 feet from the low tide line, and samples for Jamaica Cove should be collected approximately 41 feet from the low tide line to determine if criteria are exceeded at the end of the mixing zone.

Additional Comment: The Navy's response is very helpful in providing a summary of the Navy's current interpretation of where samples should be collected to determine compliance with water quality criteria. Therefore, the information in the response should be included somewhere in the *Seep/Sediment Report*, with an appropriate reference included in Section 3.2.1 (if the information is not included in that section). In addition, it is our understanding that the MEDEP must approve the location of compliance points, including underlying assumptions and calculations. In response to MEDEP Comment 8 (dated 2/1/00), information concerning calculation of dilution factors will be included as an appendix to the revised *Seep/Sediment Report*. We look forward to resolution of the mixing zone/dilution factor/compliance point issue.

SAPL Original Comment 12. Page 3-11, Section 3.2.3 Evaluation of Detection Limits. We appreciate the inclusion of the discussion of the comparison of detection levels to screening criteria as this is an issue we have raised in reviewing other documents. The text states that some chemicals had detection limits greater than surface water or sediment screening criteria. It would be helpful if the text included a summary of which chemicals out of how many, and how often detection limits exceeded criteria.

Navy Response: Tables showing the detection limit exceedances for screening criteria for seep and sediment will be added to Appendix B.

Additional Comment: The inclusion of this information in Appendix B will help in understanding screening criteria exceedances. We assume that the text will also be revised to include a reference to the Appendix B table.

SAPL Original Comment 13. Page 3-12, Section 3.3 COMPARISON OF SEDIMENT DATA TO REGIONAL SEDIMENT CONCENTRATIONS. With regard to the reference station data mentioned at the top of the page, will the validated data from the first round of interim offshore monitoring be available for inclusion in the Final *Seep/Sediment Report*? This would be helpful as there is no data available yet for RF-4.

Navy Response: Please see our response to MEDEP Specific Comment 11.

Additional Comment: The Navy's response states that the data will not be included in the *Seep/Sediment Report* as it is already available in the Round 1 data package. We suggest the last sentence in the first paragraph on page 3-12 be revised to state that data for RF-4 are available in the Round 1 data package, and that the Round 1 data package be added to the list of references.

SAPL Original Comment 15. Page 4-10, Section 4.2.3 Co-Occurrence of Chemicals. *"It is noted that enrichment does not necessarily equate to elevated concentrations; they may just have unique concentrations in relation to other parameters."*

It is not clear what this statement means. Please clarify.

Navy Response: Please see our response to MEDEP Specific Comment 15.

Additional Comment: The Navy's response provides a definition of "unique" that is specific to this passage of the report. Therefore, we suggest the information provided in the response be added to the document text to clarify the usage of the term.

SAPL Original Comment 16. Page 4-10, Section 4.2.4 Potential Pathways of Contaminant Migration. In addition to the two pathways mentioned, groundwater discharge through fractured bedrock should also be considered.

Navy Response: Please see our response to MEDEP Specific Comment 14.

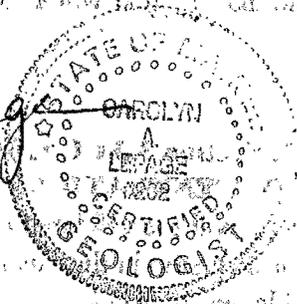
Additional Comment: We suggest the text be revised to state that the overburden pathway includes shallow fractured bedrock, as stated in the Navy's response.

If you have any questions regarding the comments above, please give me a call at 207-777-1049.

Sincerely,

Carolyn A. Lepage

Carolyn A. Lepage, C.G.
President



cc: Iver McLeod, MEDEP
Meghan Cassidy, EPA
Marty Raymond, Portsmouth Naval Shipyard
Charles Hebson, CMT Engineering