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NSY PORTSMOUTH
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LETTER FORWARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON THE DRAFT FINAL FACILITY BACKGROUND DEVELOPMENT WITH ATTACHMENT NSY PORTSMOUTH ME
5/9/2000
PORTSMOUTH NAVAL SHIPYARD

DEPARTMENT OF THE NAVY
PORTSMOUTH NAVAL SHIPYARD
PORTSMOUTH, N. H. 03804-5000

IN REPLY REFER TO:

May 9, 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 the March 2000 *Draft Final Facility Background Development* 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,

Marty Raymond for

Ken Plaisted
Navy Co-Chairman
Restoration Advisory Board

Distribution:

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PNS (Code 100PAO) w/o encl
Carolyn Lepage w/o encl

Lepage Environmental Services, Inc.

P. O. Box 1195 • Auburn, Maine 04211-1195 • 207-777-1049 • Fax: 207-777-1370

May 10, 2000

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

Subject: Review of Responses to Comments on the *Draft Final Field Investigation Report, Site 10 (Building 238) and Site 29 (Teepee Incinerator)*

Dear Ms. Lyons:

As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) on the Navy's responses to our January 28, 2000 comments on the December 1999 *Draft Final Field Investigation Report, Site 10 (Building 238) and Site 29 (Teepee Incinerator)*. Many of the Navy's responses were satisfactory. However, questions or concerns remain regarding the following comments. Note that we have retained the comment numbering and repeated the original comment from our January 28th letter.

Original SAPL Comment 4. Page ES-3, SITE 10 (BUILDING 238) Recommendations. This section has been revised significantly from the January 1999 Draft Report, with the Navy now clearly stating that additional site investigations are needed at Site 10. Given the radial pattern of groundwater flow depicted on figures in subsequent sections (see Figure 3-2, for example) and the location of the piping and underground tank, it appears that at least two additional monitoring wells will be needed to assess contaminant migration at the site. The concentrations of contaminants in excess of Maximum Contaminant Levels (MCLs) and continuing high turbidity at monitoring well BA-02 should also be addressed.

Navy Response: Please see the Navy's response to MEDEP comment no. 1.

Additional Comment: The response to MEDEP comment no. 1 states that the Navy is not currently planning to install additional monitoring wells at Site 10 as the area is currently tidally flushed and the interim offshore monitoring program provides a sampling location to the east on well MW-BA01. The Navy believes that this location should provide data in determining whether the offshore is being affected to the west.

We do not believe that one monitoring well is sufficient to characterize groundwater at a site, particularly one where groundwater flows radially outward (note that groundwater flow directions at low tide, as shown on Figure 3-2, vary by almost 180 degrees). Nor do we believe that a single offshore monitoring point is sufficient to judge potential offshore impacts at Site 10, especially

given the radial pattern of groundwater flow. Therefore, we reiterate our original comment that additional monitoring wells are needed to assess contaminant migration associated with the piping and the underground tank. In addition, the concentrations of contaminants in excess of MCLs and continuing high turbidity at monitoring well BA-02 need to be addressed.

Original SAPL Comment 5. Page ES-4, SITE 29 (TEEPEE INCINERATOR) Background. In response to our earlier comments, the Navy added information concerning Building 314 (the former pesticide handling building) to this section and elsewhere in the report. [Note: We do not have the sketch of the flap valve specified in the Navy's response to our July 1999 Comment Number 47.] The additional passage states that pesticides were stored in the building before mixing. Where were the pesticides actually mixed - at building 314 or at a different location? Building 314 was used between 1982 and 1995. We understand that the Navy has contracted out for pesticide services since 1995. Where were pesticides stored, handled, and mixed prior to 1982? It would also be helpful to know what Building 310 was used for, and how long it was present at the site.

Navy Response: Please see our responses to EPA comment no. 3 and MEDEP comment no. 6.

Additional Comment: The response to EPA comment no. 3 indicates that Building 314 was used for mixing, not just storing, pesticides. The fact that pesticides were not only stored, but actually handled at this location raises additional concerns for the potential impacts of pesticide releases. In addition, the Navy's response to the EPA's comment does not address our question regarding where pesticides were stored, handled, and mixed prior to 1982. This question still requires a response.

Original SAPL Comment 6. Page ES-6, SITE 29 (TEEPEE INCINERATOR) Recommendations. We believe that additional investigations should be conducted at Site 29. As the Navy acknowledges in the Executive Summary and elsewhere in the text (see page 4-8, for example), the limits of the former ash disposal area are not known and are likely to extend beyond the sampling locations. And as we have pointed out in previous comments, results for surface and subsurface soils near the perimeter of the site exceed screening criteria, and the vertical extent of contamination has not been adequately defined. The range of contaminant concentrations present at the site, particularly maximum values, also should be refined. Additional field investigations are needed to fully determine the extent and nature of contamination at Site 29 so that risks can be assessed more accurately and appropriate remedial decisions can be made.

Navy Response: Based on available information on the Ash Disposal Area, ash was spread across the area uniformly. Therefore, there is no reason to believe that the range of chemical concentrations have not been adequately characterized at this time. The Navy believes that the

nature and extent of contamination has been investigated sufficiently to conduct a risk assessment for Site 29 and to develop and evaluate remedial alternatives for Site 29. The risk assessment for OU2 (including Site 29) is currently being conducted in accordance with the Technical Memorandum on the Recommended Human Health Risk Assessment Protocol for Operable Unit 2 dated December 1999.

The Navy does not intend to collect any additional data for inclusion in the current risk assessment. Also see our response to EPA comment no. 1.

Additional Comment: What is the basis for the statement that ash was spread uniformly across the site? The information in the soil boring logs and in the text does not indicate uniform spreading, and the range of chemical concentrations detected does not indicate a uniform distribution of contaminants at the site. As we stated in our original comment, neither the horizontal nor the vertical extent of contamination has been adequately defined. Therefore, contrary to the Navy's response, there is no reason to believe that chemical concentrations have been adequately characterized. Additional investigation is needed in order to properly evaluate risks and select and implement remedial measures.

Original SAPL Comment 9. Page 1-6, Section 1.4.2 Site 29 - Teepee Incinerator. Comment 5, above, applies to this section as well.

Navy Response: Please see our responses to EPA comment no. 3 and MEDEP comment no. 6.

Additional Comment: As we noted in our Additional Comment on SAPL Original Comment no. 5, the mixing of pesticides at Building 314 increases the likelihood of spills and releases and resulting contamination. In addition, our question regarding where pesticides were handled and stored prior to 1982 still requires a response.

Original SAPL Comment 13. Page 3-7, Section 3.4.2 Subsurface Soil. *"Lead is considered to be a site-related contaminant."* We had commented previously on this statement with regard to surface soils. The Navy removed the sentence and was to identify compounds that exceed criteria (see Comment Number 12, above). The same should be done for the Subsurface Soil section.

Navy Response: Please see our response to MEDEP comment no. 11.

Additional Comment: MEDEP comment no. 11 and the Navy's response focus on including information regarding exceedances of reference levels. SAPL's comment no. 13 relates to the use of the phrase "site-related" to characterize lead. As we pointed out in our April 14, 1999

comment no. 36, while we do not necessarily disagree that lead is a site-related contaminant in surface soil, the Navy should explain why other compounds that also exceed criteria are not considered site-related. We were attempting to make the same point with regard to subsurface soil in our January 28th comment no. 13. Therefore, our comment no. 13 still requires a response.

Original SAPL Comment 18. Page 4-59, Figure 4-1. The configuration of the ash disposal area on this and similar figures should be expanded, to the extent possible, to reflect the results of the investigation.

Navy Response: Please see our response to EPA comment no. 1.

Additional Comment: We still believe the figures should be revised to incorporate the results of the investigation. The text on page 4-7 states that the location of soil boring TPI-SB03 was originally thought to be outside the limits of the ash disposal area, but that the analytical data suggest that the ash disposal area extends to at least this location. We do not understand why the figures should not reflect what is stated in the rest of the report.

Original SAPL Comment 20. Pages 5-1 - 5-4, Section 5 CONCLUSIONS AND RECOMMENDATIONS. We have made a number of comments in this letter that also apply to this section. Of particular concern are the comments relating to recommendations (Comments 4, 6, and 7).

Navy Response: Please see our responses to SAPL comments no. 4, 5, and 7.

Additional Comment: As noted above, we still have concerns regarding SAPL comments no. 4 and 5.

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

Sincerely,

Carolyn A. Lepage

STATE OF MAINE
CAROLYN A. LEPAGE
6202
CERTIFIED GEOLOGIST

Carolyn A. Lepage, C.G.
President

cc: Iver McLeod, MEDEP
Meghan Cassidy, EPA
Marty Raymond, Portsmouth Naval Shipyard

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