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LETTER AND COMMENTS ON BEHALF OF SEACOAST ANTI POLLUTION LEAGUE REGARDING WORK PLAN FOR BUILDING 184 SUBFLOOR INVESTIGATION NSY PORTSMOUTH ME
7/5/2000
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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July 5, 2000

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

Subject: June 2, 2000, *Work Plan for Building 184 Subfloor Investigation*

Dear Ms. Lyons:

As you requested, we are transmitting comments on the June 2, 2000, *Work Plan for Building 184 Subfloor Investigation, Portsmouth Naval Shipyard* to the Seacoast Anti-Pollution League (SAPL). Building 184, also known as Site 30, originally operated as a galvanizing plant during the second world war. The building contained an "acid-proof" pit which was filled in a number of years after the war. The investigation described in this Work Plan is intended to determine the extent of contamination in the former acid-proof pit area. Our comments on the Work Plan are as follows:

1. Page 1, Section 1.1 Overview of Work Plan. This section states that field sampling and analytical procedures are described in Section 5.0, regulatory compliance in Section 6.0 and project management in Section 7.0. However, the section covering sampling and analytical procedures has been left out entirely, and Sections 5.0 and 6.0 in the Work Plan cover regulatory compliance and project management, respectively. The information regarding sampling and analysis must be provided for review in order to evaluate the adequacy and appropriateness of the proposed investigation.

2. Page 1, Section 2.0 SITE DESCRIPTION. This section is far too brief and does not include enough background information about the Shipyard's history and activities. In addition, the section should be retitled "Facility Description" to avoid confusion regarding the use of "site". The "site" in this instance is Site 30, or Building 184.

3. Page 1, Section 3.0 PROJECT DESCRIPTION. Additional information is needed in this section to "set the stage" for the proposed investigation project. This historical information should include a summary of the site screening activities recently conducted at Site 30. Appropriate documents (including the Site Screening Report and analytical results for the crystalline substances) should be cited in the text and included in a list of references. A figure showing the details of Building 184, including the location of the acid-proof pit, the five tanks, the crystalline substances, and the site screening sampling and wells, as well as the proposed investigation location(s), should be added to the Work Plan.

4. Page 1, Section 3.0 PROJECT DESCRIPTION. The purpose of the investigation is described in the third paragraph of the section as "to determine the extent of contamination below the existing concrete floor slabs." However, it is not clear from the information presented in this section and elsewhere in the Work Plan how the extent of contamination will actually be determined. The rationale for the selection of investigation locations must be included in the Work Plan. In addition, as noted in comment number 1, above, there is inadequate information regarding sampling procedures, analytical methods, and data interpretation and presentation. More detailed information is needed. There is also some confusion regarding the number of samples to be collected. The sentence at the end of the second paragraph in Section 3.0 states that the Navy is proposing to collect several samples from the former acid proof pit. However, the third paragraph states that Foster Wheeler will collect only one representative sample. The text should be corrected appropriately. Finally, Section 4.3 indicates that an opening 3 feet by 3 feet will be cut in the concrete slab, and that investigations will be conducted in the area beneath that opening. Based on the dimensions of the five tanks that were reportedly contained within the pit, the pit itself measured a minimum of 30 feet by 24 feet by 3 to 4.5 feet deep. A 3-foot by 3-foot area is not adequate to "determine the extent of contamination" in the former pit area.

5. Pages 2 & 3, Figures 2-1 & 2-2. The maps on the figures must be clearer and easier to read.

6. Page 4, Section 4.1 Mobilization. What is Delivery Order 38, which will run concurrently with the subfloor investigation?

7. Pages 4 & 5, Section 4.3 Sub Floor Investigation Activities. Will the crystalline substance removed from the building also be tested? The second paragraph states that a PID will be used to check for VOCs. Radiological hazard monitoring should also be conducted. As noted in comment number 4, above, the 3-foot by 3-foot area is not adequate to determine the extent of contamination on the former pit area. The sampling and analytical methods also should be described in detail, including those for water that may be encountered in the excavation.

8. Page 6, Section 5.5 Release/Spill Reporting. The HASP is mentioned in this and other sections. When will the Navy be providing copies for review?

9. Pages 6 & 8, Section 6.1 Project Staffing Plan and Figure 6-1. If the project includes collection and interpretation of geologic data, a Maine Certified Geologist must be involved in a responsible position and stamp the final report.

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
0202
CERTIFIED GEOLOGIST

Carolyn A. Lepage, C.G.
President

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