

N00102.AR.002157
NSY PORTSMOUTH
5090.3a

LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT TEST PITTING
INVESTIGATION REPORT FEBRUARY AND MARCH 2000 ACTIVITY JAMAICA ISLAND
LANDFILL NSY PORTSMOUTH ME
8/1/2000
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

Mr. Fred Evans
Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Hwy., Mail Stop #82
Lester, PA 19113-2090

Re: Draft Test Pitting Investigation Report
Jamaica Island Landfill
February/March 2000 Activity
Portsmouth Naval Shipyard
Kittery, Maine

Dear Mr. Evans:

The United States Environmental Protection Agency (EPA) has reviewed the draft document entitled "Test Pitting Investigation Report, Jamaica Island Landfill, February/March 2000 Activity, Portsmouth Naval Shipyard, Kittery, Maine". The document is dated August 2000.

EPA's comments on this document are provided in Attachment I to this letter.

If you have any questions regarding this matter, please contact me at (617)918-1387.

Sincerely,

A handwritten signature in cursive script that reads "Meghan F. Cassidy".

Meghan F. Cassidy
Remedial Project Manager

Enclosure

cc: Marty Raymond/PNS
Iver McLeod/ME DEP
Carolyn Lepage/Lepage Environmental
RAB Members

ATTACHMENT I

The following are EPA's comments on the draft document entitled "Test Pitting Investigation Report, Jamaica Island Landfill, February/March 2000 Activity, Portsmouth Naval Shipyard, Kittery, Maine". The document is dated August 2000.

1. A map showing the anomalies related to the test pit locations should be provided in the text.
2. Page ES-3, Item 1: The justification to support that TP-4 was "the most probable locations of buried drums..." must be provided.
3. Page 2-3, last paragraph: The text refers to groundwater entering a test pit, and indicates that this groundwater "did not appeared stained". Is this statement meant to refer to whether there was a sheen on the groundwater, or whether the groundwater may have been discolored? Please clarify the text.
4. Page 2-5, Section 2.3.1, 1st paragraph of section: The text states that there were "Two exceptions where dioxin analysis was performed, but trace ash was not clearly observed..." The text then lists three sampling locations for dioxin. Clarify the text.
5. Page 3-1, Section 3.0, Item 1: This conclusion states that the test pit where 40 drums were located was the "most probable location of buried drums at the JILF". EPA did not find any information in this report to support this finding. What was different about the MTAD anomaly here that supports this assertion. In addition, this statement does not discuss that there was no test pitting performed in the previously "capped" portion of the JILF. While EPA recognizes why test pits were not excavated in the previously "capped" area, this area cannot be left out of the discussion. The text should discuss whether there were anomalies detected within the "capped" area that are similar to the one at TP-4.
6. Page 3-2, Section 3.0, Item 3: This conclusion is not necessarily valid for the entire JILF. It should be no surprise that the contents of a landfill are heterogeneous.