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LETTER AND COMMENTS FROM RESTORATION ADVISORY BOARD MEMBER REGARDING FEASIBILITY STUDY REPORT FOR OPERABLE UNIT 3 (OU 3) NSY PORTSMOUTH ME
9/7/2000
RESTORATION ADVISORY BOARD MEMBER

September 7, 2000

Portsmouth Naval Shipyard
Code 106.3R Bldg. 44
Attn. Marty Raymond
Portsmouth, New Hampshire 03804-5000

Re: Feasibility Study Report for Operable Unit 3
Portsmouth Naval Shipyard
Kittery, Maine

Dear Ms Raymond,

I offer the following comments as a member of the Restoration Advisory Board in response to the document titled Feasibility Study Report for Operable Unit 3, revision date: July 2000.

1. It is unfortunate and untimely that review comments on the FS are due prior to the Technical Meeting being held to discuss the Jamacia Island Landfill (JILF) seep issue. Resolution of the seep issue is a major component in the development and selection of remedial actions for JILF.

2. The Navy's response to Comment No. 5 from my letter dated December 26, 1999 is based in part on hearsay discussions at a RAB meeting. The Navy's response reads: "....*Also, Mr. Doug Bogen indicated at a RAB meeting that based on discussion between Dr. Henri Gaudette; Ms. Carolyn Lepage, SAPL TAG Advisor; and himself that PNS was not a current source to Spruce Creek."* It is my understanding that Mr. Bogen and Ms. Lepage feel that the their comments which were taken entirely out of context and the Navy's response is inappropriate. A more appropriate response is requested to address the potential of Spruce Creek being a receptor for PSNY contaminates. Please note that Section 5.2.1 of the Estuarine Ecological Risk Assessment, dated May 2000 states *"...In addition there appears to be a possibility of Pb transport from the lower Piscataqua into Spruce Creek, especially from sources near Clark Cove and in the Back Channel. Furthermore, because the transport of PB is similar to other particle-active metals, such as Hg, Cu, Ni, and Ag, the Pb results may be indicative of transport and dispersion of other metals."*

3. Section 8.2.2, page 8-6 Groundwater and seep monitoring on only an annual basis is not appropriate under Alternatives Nos. 2, 3 and 4. These alternatives do not have source control to prevent migration of containments via groundwater and seeps. A strong potential exists for future releases from undiscovered steel drums within JILF. Test pitting in the spring of 2000 provided ample evidence that previously unknown materials are deposited in JILF within containers made of corrosive material. Steel containers that are located above the water table and are currently in sound condition will eventually perforate. The MTADS survey and limited test pitting program did not prove that additional drums are not present elsewhere in JILF. The MTADS study did not include the entire landfill surface and there was difficulty is correlating the magnetic readings and drum locations. The test program was limited to 25 excavations. It is also notable that the Navy has not evaluated the impacts of

rising tide levels relative to the deposition of waste in JILF. The Feasibility Study should evaluate the time of travel for contaminates from a future release and an appropriate monitoring interval selected to allow a response to such a release. Real time monitoring should be considered to alert responsible parties of elevated contaminate levels.

4. Only Alternative No. 5 provides source control (in the form of a barrier wall around the entire landfill) for groundwater and seeps. To address the concerns of continuing contaminate release from the seeps and the eventual release of contaminates from undiscovered containers, other alternatives (or a supplement to Alternative No. 5) should be developed to provide a more cost effective means of source control. This could include partial barrier walls, tide gates, or other means to minimize the tidal flux and flow of groundwater through the waste. The Navy has conducted considerable research for the cap design. Surely, a high level of technical expertise should also be directed toward developing innovative solutions for the seep and groundwater issues.

5. Because of the presence of incinerator ash in JILF, future analytical testing should include dioxin. Testing for DDT and DDD should also be continued.

6. Installation of erosion controls (standard or wetlands construction) should not extend beyond the existing shoreline. The existing landward slopes should be regraded as necessary. Construction of fill on tidal flats could be a violation of State Law. If such a fill in tidal areas is actually permitted, the loss of tidal habitat should be mitigated.

7. Erosion control embankments consisting primarily of sand (as discussed at the 8/3/2000 RAB meeting) should be not be used unless supplemental materials are used to create a matrix that is less susceptible to progressive failure. Natural fiber matting materials or stone intermixed throughout the sand should be used to improve the fill stability.

8. To benefit potential readers from the community, please provide a direct response to each item, not simply a reference to other responses.

Please call 603-433-2335 (w) or 207-439-3875 (h) if you have any questions regarding these comments.

Very truly yours,

Jeffrey K. Clifford, P.E.

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cc: Earldean Wells, Kittery Conservation Commission
Kathleen Leyden, Spruce Creek Steering Committee Coordinator
Iver McLeod, MDEP
Doug Bogen, RAB Co-chair
Carolyn Lepage, SAPL-TAG