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LETTER AND COMMENTS ON BEHALF OF SEACOAST ANTI POLLUTION LEAGUE ON U S
NAVY RESPONSES REGARDING DRAFT REVISED OPERABLE UNIT 2 (OU 2) RISK
ASSESSMENT NSY PORTSMOUTH ME
10/19/2000
LEPAGE ENVIRONMENTAL SERVICES

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October 19, 2000

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

Subject: Review of the Responses to August 12, 2000, Follow-Up Comments on the March 2000 *Draft Revised OU2 Risk Assessment*

Dear Ms. Raymond:

We are transmitting comments on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the Navy's responses to our August 12, 2000, follow-up comments on the March 2000 *Draft Revised OU2 Risk Assessment*. The Navy's responses are included in Appendix M.2 of the September 2000 *Revised OU2 Risk Assessment*. Our comments are as follows:

1. Clarifying OU2-Related Risks. SAPL's Original and Follow-Up Comments Numbers 2 and 8 focused on adding text that would clarify for the reader that the *Revised OU2 Risk Assessment* dealt only with on-shore human health risks, and that ecological risks or potential offshore impacts from OU2 were covered in other documents. The suggested changes to the text are minimal, as SAPL has not been asking for a discussion of OU2-related ecological or offshore risks, just a statement identifying where that information can be found. The Navy's response to SAPL's Original Comment 2 lists the reports where information on ecological and potential offshore impacts from OU2 can be found. As suggested in SAPL's Follow-Up Comment Number 2, the information in the Navy's original response should be added to the text.

The public is concerned with potential ecological and human health risks associated with contamination at OU2, particularly given the erosion of highly-contaminated soil along the OU2 shoreline that was discovered last summer. Land-based contamination has made its way from OU2 into the offshore environment. The title suggests that all OU2-related risks are addressed in the *Revised OU2 Risk Assessment*, not just on-shore human health risks. It does not seem too much to ask that the reader be able to easily track down where the other OU2-related risks are evaluated. The requested text revisions do not seem to be particularly difficult or burdensome. In addition, as noted in Dr. David Brown's Follow-Up Comment Number 10, the Executive Summary could likely to be misunderstood by an educated reader that is not involved with this project. We do not understand why the Navy has been unwilling to add a simple clarification statement that would provide the reader with appropriate references.

2. Extent of Site 29 Contamination. SAPL has expressed concern that the nature and extent of contamination at Site 29 has not been adequately defined, resulting in uncertainty regarding the adequacy of risk evaluation. This concern extends to the potential for wind-blown erosion and off-site deposition from contaminated soil horizons that are now buried (see SAPL's Original and Follow-up Comments 4, 12, and 21). The Navy's responses state that SAPL's concerns with site characterization and its impact on the understanding of risks at Site 29 are better addressed as part of the *OU2 Feasibility Study* Data Quality Objectives discussion to determine whether additional investigation of Site 29 is necessary. SAPL looks forward to that discussion.

3. DDT and Its Metabolites. SAPL's Original and Follow-Up Comment Number 17 echoed a Maine Department of Environmental Protection comment (Comment Number 6 dated 5/15/00) that the extent of contamination by DDT and its metabolites DDE and DDD should be described for the individual compounds and collectively, as the sum of concentrations. The Navy's response states that the summation of DDT, DDE, and DDD would not impact the understanding of the nature and extent of contamination, the risk assessment, or the need for a CERCLA remedial action at any site because the slope factors and reference doses for the three compounds are different, so that screening criteria for the compounds cannot be summed. Therefore, no revision would be made to the text. It is SAPL's understanding that summing the concentrations is common practice in risk assessments involving DDT, and would help in evaluating the distribution and potential impact of DDT and its metabolites. The Navy should present sums of concentrations as requested.

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

Sincerely,



Carolyn A. Lepage, C.G.
President

cc: Johanna Lyons, SAPL
Iver McLeod, Department of Environmental Protection
Meghan Cassidy, Environmental Protection Agency
David Brown, Sc.D.

