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LETTER AND COMMENTS ON BEHALF OF SEACOAST ANTI POLLUTION LEAGUE
REGARDING WORK PLAN FOR SAMPLING AND ANALYTICAL SERVICES FOR TEST
PITTING AT BUILDING 184 NSY PORTSMOUTH ME
11/13/2000
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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November 13, 2000

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

Subject: October 2000, *Work Plan for Sampling/Analytical Services for Test Pitting at Building 184 (Site 30) for Portsmouth Naval Shipyard*

Dear Ms. Raymond:

We are submitting the following comments on the October 2000, *Work Plan for Sampling/Analytical Services for Test Pitting at Building 184 (Site 30) for Portsmouth Naval Shipyard* on behalf of the Seacoast Anti-Pollution League (SAPL):

1. Page 1-1, Section 1.0 INTRODUCTION. The first paragraph of this section states that this Sampling/Analytical Work Plan is an appendix to the June 2, 2000, *Work Plan for Building 184 Subfloor Investigation, Portsmouth Naval Shipyard* prepared by Foster Wheeler Environmental Corporation (FWENC). We had submitted comments on FWENC's June 2000 Work Plan in our letter dated July 14, 2000. The responses to our July comments, as well as responses to regulatory agency comments, indicate FWENC's Work Plan will be revised. We note that we have not seen that revised document yet, and may have additional comments on the sampling/analysis aspect of the project when we have an opportunity to review it.

2. Page 1-1, Section 1.0 INTRODUCTION. The overall objective of the investigation, as currently stated in this section, is a bit confusing and should be revised. The objective appears to encompass determining the nature of the chemical composition of the material filling the acid-proof pit and determining the origin of the crystalline materials observed on the floor. However, the first of these two objectives does not mesh with the Data Quality Objectives discussion in Section 3. The second objective listed on page 3-1 focuses on the risk posed by the source area, not on determining the chemical composition of the fill material. The objectives on the proposed investigation must be clearly and consistently stated in the Work Plan. Furthermore, as noted in several comments below, the extent of contamination associated with Site 30 has not been determined, so discussion of site-related risk would appear to be premature.

3. Page 2-1, Section 2.1 SITE BACKGROUND. Where does (did) the drain mentioned in the first paragraph discharge? Does/did it discharge to the sewer mentioned on page 2-2? What were the trenches mentioned in the second paragraph used for? Where do/did they discharge?

4. Page 2-3, Section 2.2 PREVIOUS INVESTIGATIONS. As noted in several previous comment letters on the Site Screening Report for Sites 30 - 32, we disagree with the statement "*Based on the findings of the site screening, the horizontal extent of contamination appears to be adequately defined.*" As we noted in Comment Number 8 in our letters dated May 2 and July 28, 1999, we think it is premature to state that the horizontal extent of contamination is defined, particularly when the Navy acknowledges in the subsequent passage that the source of the contamination at Building 184 has not yet been identified, and that additional investigations will be required. Furthermore, reevaluation of water level and tidal data indicates that only one of the four monitoring wells appears to be downgradient of Building 184. As we stated in our May 22, 2000, comment letter, we concur with the Maine Department of Environmental Protection's (MEDEP) May 1, 2000, comment that more monitoring wells may prove necessary in the remedial investigation phase if proper water levels or corrections for tidal effects are not completed or if new data do not alleviate concerns regarding the proper location of downgradient wells at the site. The outstanding concerns about the adequacy and completeness of the site characterization at Site 30 should be acknowledged in the text.

5. Page 3-1, Section 3.1 Nature of Risk Posed by the Source Area. As noted in Comment Number 2 above, the objectives on the investigation must be clearly and consistently stated. We take issue with the opening statement in this section, "*The Site Screening Report ... indicated that the soil and groundwater outside of Building 184 were not impacted by any potential environmental releases from the pit inside the building.*", for the reasons identified in Comment Number 4, above. Only one of the four soil sampling and monitoring well locations outside Building 184 appears to be downgradient of the pit location. Therefore, the statement should be revised appropriately or removed. The paragraph goes on to summarize the Site Screening Process, and concludes that "limited sampling" to collect additional data on the source area is needed to make a recommendation of further action or no further action at the site. Previous comments have also identified the need for additional groundwater data evaluation in order to make informed decisions.

6. Page 3-2, Section 3.1 Nature of Risk Posed by the Source Area. The first bullet at the top of the page identifies the concrete floor slab and the building enclosing the pit as minimizing potential migration of contaminants into groundwater. While these structural components have likely been effective in preventing infiltration of precipitation into the pit, there is no evidence that releases to groundwater did not occur through the bottom of the pit or via the drain or trenches mentioned earlier in the Work Plan (see Comment Number 3, above). The second bullet states that groundwater contamination appears to be limited to iron. As noted in Comments 4 and 5 above, groundwater downgradient of the pit has only been characterized at one sampling location. Both bullets should be revised. In addition, the second paragraph beneath the bullets contains the statement that the concrete floor slab protects the current site users from exposure to the material within the pit, so that the risks to current users do not need to be identified. However, the recurrence of the highly acidic crystalline substance on the interior walls of the building indicates potential exposure to people currently working in the building. The text should be revised.

7. Page 4-2, Section 4.1 LOGGING PROCEDURES. The minimum information to be included on the test pit logs should include the visual classification of soils or other materials and changes in strata (as noted on page 4-1). A bullet to that effect should be added to the list at the bottom of page 4.2.

8. Page 4-3 SAMPLING PROCEDURES. This section states that up to three crystal samples will be collected from different above-ground locations if a significant variation in physical characteristics is noted. What is considered a significant difference? How many crystal samples will be collected if no significant differences are observed? The bottom of the test pit is estimated to be 4 to 5 feet below the floor slab. Do OSHA trenching regulations govern excavations of this depth? How will the crystal and soil samples actually be collected? With a trowel, spoon, or other device? How will liquid (if encountered) samples be collected?

9. Page 5-7, Section 5.3.4 Field Documentation Responsibilities. Any changes in project operating procedures should be summarized in the final project report described on page 6-3.

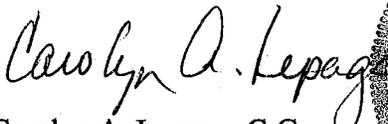
10. Tables 5-1 and 5-3. The TPH analytical methods identified in Table 5-1 for analyzing Building 184 samples should be the State of Maine methods for DRO and GRO. The reporting limits for aqueous samples listed in Table 5-3 should be at or lower than MCLs or MEGs

11. Page 6-2, Section 6.1 DATA EVALUATION. As noted in several comments above, there is only one sampling location located downgradient of the pit. Therefore, we are uncomfortable with a data comparison to evaluate leaching of chemicals from soil/solid media to groundwater based on this one point.

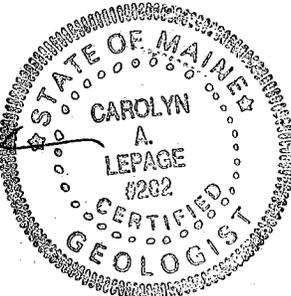
12. Page 6-3, Section 6.2 REPORT PREPARATION AND DELIVERABLES. The report should include a summary of any changes in project operating procedures (see page 5-7).

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, MEDEP
Meghan Cassidy, EPA