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NSY PORTSMOUTH
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LETTER AND COMMENTS FROM MAINE DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING SCHEDULES FOR OPERABLE UNIT 3 (OU 3) AND 6 (OU 6)
NSY PORTSMOUTH ME
12/11/2000
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
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December 11, 2000

Mr. Fred Evans
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

re: Schedules for OU3 and OU6

Dear Fred:

The Maine Department of Environmental Protection has reviewed the schedules referenced above. The Department's comments follow.

OU3

The MEDEP has no comments regarding this schedule.

OU6

1. The start date of September 2005 for remedial investigation of management of migration is not acceptable to the MEDEP. As MEDEP has stated several times we are concerned about the possibility of impact to biota in seeps exposed to the undiluted seep water. In order to be sure that there is no significant impact requiring immediate action the Navy must perform this investigation within the next two years. This requires preparing the Draft RI Workplan by fall of 2001.

The Navy must show that the seeps above midtide are *both* in compliance with ARARs and do not pose an unacceptable risk to biota within the seep. Therefore, the following activities are required for OU6:

- Define "midtide"
- Determine locations of seeps above midtide
- Determine objectives of the investigation:
 - ⇒ Do contaminant levels in seeps exceed ARARs?
 - ⇒ Are contaminants in seeps posing unacceptable risk to biota within the seep?

Perhaps these questions should be answered as part of a Site Investigation prior to the Remedial Investigation.

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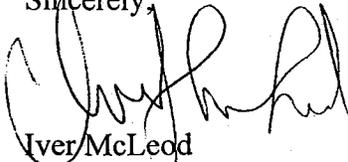
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- Develop Remedial Investigation Work Plan
 - Develop Decision Tree or some other method of determining the next course of action depending on results of Remedial Investigation.
2. There does not appear to be any time allotted for determining Data Quality Objectives or other items listed in Comment 1. Is this part of the RI Workplan?
 3. Based on the dates in the Start column, the first column for the bar chart should be entitled 2005, not 2006 (though as stated above we expect the investigation to start earlier than 2005).

Please feel free to contact me at (207) 287-8010 if you have any questions.

Sincerely,



Iver McLeod
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