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NSY PORTSMOUTH
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LETTER REGARDING THE CITY OF PORTSMOUTH COMMENTS ON THE U S NAVY
PROPOSED REMEDIAL ACTION PLAN FOR OPERABLE UNIT 3 (OU 3) NSY PORTSMOUTH
ME
2/27/2001
CITY OF PORTSMOUTH



CITY OF PORTSMOUTH

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Evelyn Sirrell
Mayor

February 23, 2001

Mr. Alan Robinson
Public Affairs Office
Portsmouth Naval Shipyard
Portsmouth, NH 03804

Dear Mr. Robinson:

In response to the Navy's Proposed Remedial Action Plan for Operable Unit (OU) 3 at the Portsmouth Naval Shipyard the City of Portsmouth technical staff have prepared several recommendations. We are strongly supportive of these comments which follow below.

The City of Portsmouth does not believe any alternatives described in the Navy's Proposed Remedial Action Plan go far enough to protect the public interest given the uncertainties which remain as to the level of contamination the JILF poses to the public in both Maine and New Hampshire.

The City does not support the Navy's decision to separate "source control" from "management of migration" from OU3 when the impacts to the offshore and nearshore environment via seeps from the JILF are not clearly understood. In fact, the Navy has stated that there are Chemicals of Concern in the brackish/saline groundwater identified in the OU3 feasibility study. Additionally, the Navy has stated that not only will it separate "management of migration" into OU6 but that it will not study the potential impacts until 2005. This decision was made with inadequately supportive sampling or monitoring data.

The City of Portsmouth recommends that the Navy proceed with both OU3 and OU6 concurrently. Perhaps the Navy can demonstrate a valid administrative reason to separate these two units, but we believe it has not demonstrated the need to delay study on OU6.

Our concern is that there is not containment at the JILF. The daily tidal action and the current groundwater seepage will continue to flush contaminants from the JILF and introduce them into the intertidal nearshore and offshore environments. Since there is an incomplete accounting of the contaminants at the JILF and uncertainty as to the condition and degree of containment of these contaminants continuous monitoring is essential as the situation could change at any time with a potential new hazardous releases occurring at any time for a variety of reasons.

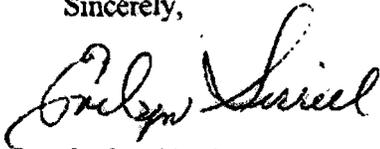
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The Remedial alternatives forwarded by the Navy are in our estimate incomplete. We do not understand why alternative 5 (which considered a cover with composite liner and enhance barrier layer, cut-off barriers, institutional controls, erosion control and monitoring) was removed from discussion. Additionally, why was there no consideration of complete removal of all or partial removal of landfill materials. A discussion of this alternative would have provided useful information to the affected public.

The City of Portsmouth requests that the Navy implement a testing protocol for the seeps from the landfill as well as intertidal monitoring to insure that at a minimum the public can be notified if there is any danger of contamination though eating fish or shell fish from the waters around the JILL. The City supports Alternative 5 which is not presented in the final PRAP but was presented in the November 2000 PRAP. We believe the addition of a cut-off barrier is essential at this site due to the daily ingress and egress of tidal waters on the landfill and to protect the landfill from the impact of severe storms events or impacts do to potential sea level rise.

Sincerely,



Evelyn Sirrell
Mayor

cc: City Council
John Bohenko, City Manager

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