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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
FEBRUARY 2001 DRAFT HEALTH AND SAFETY PLAN FOR ADDITIONAL INVESTIGATION
AT SITE 10 NSY PORTSMOUTH ME
3/31/2001
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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March 31, 2001

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

Subject: February 2001 *Draft Health and Safety Plan for Sampling and Analytical Services for Site 10 Additional Investigation*

Dear Ms. Raymond:

We are submitting comments on the February 2001 *Draft Health and Safety Plan for Sampling and Analytical Services for Site 10 Additional Investigation* (the HASP) on behalf of the Seacoast Anti-Pollution League (SAPL). Our review of the HASP was brief and did not cover the Attachments to the HASP. SAPL's comments on the February 2001 *Site 10 Additional Investigation Quality Assurance Project Plan* are submitted in a separate letter. Our comments on the Site 10 HASP are as follows:

- 1. Page 1-1, Section 1.0 INTRODUCTION.** What are the activities to be conducted at Site 10 that would require subcontractors to develop a HASP addressing diving?
- 2. Page 2-8, Figure 2-1.** The emergency response protocol should involve notification of the USEPA and MEDEP.
- 3. Page 3-1, Section 3.0 SITE BACKGROUND.** This section should include a site figure showing, at a minimum, Building 238, the pipeline and underground tank locations, and the shoreline.
- 4. Page 4-1, Section 4.0 SCOPE OF WORK.** This section should reference the Site 10 additional investigation Work Plan, but should also include details such as the number and location of borings, the depths of soil samples, locations of groundwater samples, what's in the crawl space and what's outside, etc. Groundwater sampling should be added under the Multi-media sampling heading. The area considered to be a "Confined Space Entry" must be described more fully.

5. Page 4-2, Section 4.0 SCOPE OF WORK. The last paragraph states that any tasks to be conducted outside of the elements listed in this section will be considered a change in scope requiring modification of the HSAP. This requirement could be burdensome and time-consuming. In other documents we have reviewed, there have been Field Change Requests to accommodate the need to be flexible in the field along with the need to document changes in work scope and regulatory approval. Is such a system possible here? In addition, the HASP must identify how the changes in scope will be communicated to site workers.

6. Page 6-1+, Section 6.0 HAZARD ASSESSMENT. This section should address the assessment of radioactive hazards. This comment also applies to Table 6-1 and Section 7.0.

7. Page 6-2, Section 6.2.2 Water Hazards. The Site Background section (Section 3.1) states that water appears to enter the crawl space during high tide. Section 6.2.2 should address the hazards posed by water in the confined space.

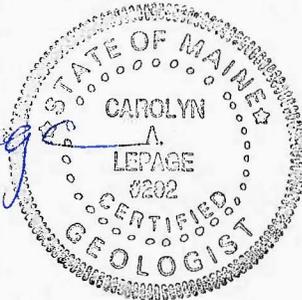
8. Page 10-3, Section 10.6 SPILL CONTROL PLAN. The USEPA and MEDEP should be notified should a spill occur.

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

Sincerely,

Carolyn A. Lepage

Carolyn A. Lepage, C.G.
President



cc: Jim Horrigan, SAPL
Iver McLeod, MEDEP
Meghan Cassidy, EPA