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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
JANUARY 2001 DRAFT FINAL DECISION DOCUMENT FOR SITE 27 NSY PORTSMOUTH
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4/6/2001
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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April 6, 2001

Portsmouth Naval Shipyard
Code 106.3 R, Building 44
Attn: Ms. Marty Raymond
Portsmouth, New Hampshire 03802

Subject: Comments on the January 2001 Draft Final *Decision Document for Site 27*

Dear Ms. Raymond:

We are transmitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) on the January 2001 Draft Final *Decision Document for Site 27*.

1. General Comment. Despite the addition of the Acronyms and Abbreviations listed in Section 5 and some improvements with the revision of the text, the document is very difficult for the general public (including those who have some knowledge of the Superfund-related activities at the Shipyard) to follow and understand. An effort should be made to improve the readability of the document.

2. Page 1-1, DESCRIPTION OF NO FURTHER ACTION. This section states that the only contaminant of concern at Site 27 is petroleum product. This statement is at odds with the groundwater quality information presented in Table 2-3, which includes a column headed "Frequency of Exceedences". If concentrations in groundwater exceed water quality criteria for a variety of metals, how can the only contaminant of concern be petroleum product? The rest of the Decision Document does not adequately address this issue. We had commented on the August 2000 draft of the Decision Document that the 1996 *Community Relations Plan* stated on page 2-13 that "Site 27 will be expanded to include the potential source areas which may be contributing to the metals contamination in groundwater at Site 27", and that exceedances of criteria for metals in groundwater at Site 27 were subsequently documented in the 1999 *Groundwater Monitoring Summary Report* (see section 4.3 and Tables 4-8 and 4-9, for example). We also commented that it was not clear how the Navy progressed from intending to expand the area (presumably the area of investigation) at Site 27 in 1996, to No Further Action in 2000. A subsequent followup comment focused on the need to provide documentation of the decision to move from expanding the site to pursuing No Further Action. The Decision Document must provide evidence of that decision-making.

3. Page 2-5, SITE HISTORY AND ENFORCEMENT ACTIVITIES. The summary of the 1996/1997 groundwater monitoring results presented in the second paragraph should also include information regarding the frequency and magnitude of water quality criteria exceedences presented in Table 2-3.

4. Page 2-5, SITE HISTORY AND ENFORCEMENT ACTIVITIES. The statement that "therefore, the groundwater-to-sediment contaminant pathway does not exist at OU5..." requires clarification that this statement represents an assumption of the model, not a fact, because this is not clear to the reader. We also note that the brackish or saline groundwater at the site indicates communication with the offshore waters, providing an opportunity for contaminants to migrate to the offshore. The last sentence on the page discusses the results of the modeling and available surface water data with regard to OU5's contribution to contamination of surface water (we are uncertain what "significant" means). A sentence should be added regarding the contaminated sediments adjacent to OU5 and the potential for contaminated groundwater from Site 27 to have adversely impacted those sediments. As we noted in comments on the previous draft of the Decision Document, contaminated sediments exist in the vicinity of Site 27 that may be attributed to releases from OU5. This fact is acknowledged on page 2-10 on the *On-Shore/Off-Shore Contaminant Fate and Transport Modeling Phase II Report*, which states that metal contamination in nearby sediments may be the result of past releases from OU5 or from other past or present Shipyard sources or other non-Shipyard sources elsewhere in the estuary.

5. Page 2-7, SITE CHARACTERISTICS. Why is TPH, rather than petroleum, used to describe contamination at the site in the later sections of the Decision Document? The text should be consistent.

6. Page 2-8, SITE CHARACTERISTICS. The statement that the onshore/offshore contaminant modeling indicated that groundwater migration is not impacting the offshore is misleading and must be revised. As we pointed out in comments on the previous draft of the Decision Document, the statement ignores the assumptions regarding the hydrogeologic setting and contaminant migration at OU5 that went into the model in the first place. And as we pointed out in Comment Number 5, above, the model assumed that the groundwater-to-sediment pathway does not exist, and the brackish-to-saline nature of the groundwater indicates communication with the offshore. Furthermore, the Phase II Modeling Report acknowledges that contaminated sediments exist in the vicinity of Site 27, and the OU5 may be a source of this contamination.

7. Tables 2-2 and 2-3. A column should be added to Table 2-2 that provides the more stringent of the Maximum Exposure Guideline (MEG) or the Maximum Contaminant Level (MCL) each parameter. A footnote should be added to Table 2-3 identifying the criteria exceeded in the last column.

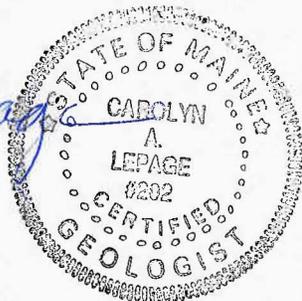
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If you have any questions regarding the comments above, please give me a call at 207-777-1049.

Sincerely,



Carolyn A. Lepage, C.G.
President



cc: Jim Horrigan, SAPL
Iver McLeod, Department of Environmental Protection
Meghan Cassidy, Environmental Protection Agency