

N00102.AR.002226
NSY PORTSMOUTH
5090.3a

LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
JANUARY 2001 DRAFT FINAL DECISION DOCUMENT FOR SITE 26 NSY PORTSMOUTH
ME
4/6/2001
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

P. O. Box 1195 • Auburn, Maine 04211-1195 • 207-777-1049 • Fax: 207-777-1370

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 26*

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 26*.

- 1. General Comment.** Even with the addition of the Acronym List in Section 5, 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 2-4 SITE HISTORY AND ENFORCEMENT ACTIVITIES.** The first paragraph on the page ends with the statement that no spills were reported to have entered the adjacent surface water. The time period involved should be added - is this since 1991? The first sentence of the last paragraph in the Site History section sounds as if the Navy didn't care about offshore effects or wasn't required to do anything about a site from which only offshore adverse effects were known. We suggest the sentence be rephrased.
- 3. Page 2-5, SCOPE AND ROLE OF OPERABLE UNIT.** The third sentence is awkward and its meaning is unclear. We suggest the sentence be rewritten. An explanation for why spills at the site are thought to only affect offshore areas should also be included.
- 4. Page 2-6, SITE CHARACTERISTICS.** The statement near the end of the paragraph that "there have been no current spills", with the 1999 spill as an exception, is confusing and should be revised. "Current" doesn't generally mean two years (or more?) ago. The timeframe involved must be better defined. Any statement regarding current human health or environmental impacts from Site 26 should immediately follow the summary of current spills.

5. Page 2-6, CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USES.

The paragraph that follows this heading doesn't seem to address the topic. The reader is likely to interpret the heading as addressing what the site is currently used for, what it is likely to be used for in the future, and the limitations on uses caused by or related to site activities. The same holds true for the use of resources. It is also not clear to the reader why "current and potential future site and resource uses for Site 26 are not relevant" just because Site 26 consists of portable tanks. Perhaps the heading should be revised as well.

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, Maine Department of Environmental Protection
Meghan Cassidy, US Environmental Protection Agency