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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
SITE MANAGEMENT PLANS NSY PORTSMOUTH ME
9/20/2001
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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September 20, 2001

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

Subject: August 2001 Responses to Comments on the Draft *Amended Site Management Plan* and Revised Schedules for the Draft Final *Amended Site Management Plan*

Dear Ms. Raymond:

We are transmitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) on the August 2001 responses to comments on the June 2001 Draft *Amended Site Management Plan* and Revised Schedules for the Draft Final *Amended Site Management Plan*:

1. Operable Unit 4 Schedule. The Final *Baseline Interim Monitoring Report* for OU4 is scheduled to be completed by July 30, 2002. However, the next OU4 task, the Feasibility Study (FS), is not scheduled to begin until July 2, 2005. Why is there a three-year gap in activities at OU4? Why is there a three-year delay in beginning the FS? Furthermore, the FS is not scheduled to be finalized until July 17, 2007, 746 days after it is begun. Why should it take two years to prepare the FS for OU4? The preparation and completion of the OU3 FS took approximately 200 days less than what the Navy is currently scheduling for OU4.

2. Operable Unit 6 Schedule. The schedule for OU6 ends with the completion of the Work Plan. As the Maine Department of Environmental Protection states in its August 31, 2001 comment letter, the schedule for OU6 should be consistent with the schedules presented for other operable units, and should extend at least through completion of a field investigation report and preferably through the signing of a Record of Decision (ROD). As SAPL has stated in previous comments (on the OU3 ROD, for example), the gap of over three years between the completion of the Data Quality Objectives meeting scheduled for this fall and completion of the OU6 Work Plan in June 2005 is far too long. The work plan should be completed well in advance of completion of the OU3 cap installation so that the information on seep concentrations and potential impacts can be gathered in the near future, not almost five years down the road. Data should be gathered before the cap is constructed so that it can be evaluated and appropriate measures can be implemented, if necessary. The data should also be compared with concentrations after the cap is installed to test the Navy's assumption that the cap will decrease the effects of the seeps.

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Site Management Plan Responses & Revised Schedules

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