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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
THE SEPTEMBER 2001 PRELIMINARY REMEDIATION GOALS FOR OPERABLE UNIT 4 (OU
4) NSY PORTSMOUTH ME
10/24/2001
LEPAGE ENVIRONMENTAL SERVICES

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October 24, 2001

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

Subject: Review of September 2001 *Preliminary Remediation Goals for Operable Unit 4*

Dear Ms. Raymond:

We are transmitting comments on behalf of the Seacoast Anti-Pollution League (SAPL) concerning the September 2001 *Preliminary Remediation Goals for Operable Unit 4*. Comments are as follows:

- 1. Page ES-4, PRG IMPLEMENTATION.** SAPL had commented in previous letters (dated 1/25/01 and 4/11/01) on the November 2000 draft *Preliminary Remediation Goals for Operable Unit 4* regarding the first sentence in the last paragraph of this section. In its 5/10/01 response to SAPL's 4/11/01 Followup Comment on Original Comment 6, the Navy agreed to revise the text as follows: "The results of implementation of the PRGs are consistent with the findings of the risk assessment, that is, the areas identified in the EERA as having intermediate risks associated with them (i.e., Sullivan Point, Back Channel, and Dry Docks) are the same areas where sediment concentrations were found above PRGs." However, this text revision has not been made. The document must be corrected.
- 2. Attachment 1, Page 3, Section 2.1 Overview of PRG Development Approach.** In its 5/10/01 response to SAPL's 4/11/01 Followup Comment on Original Comment 2, the Navy agreed to revise the first sentence in Section 2.1 as follows: "It is the objective of the PRG development to establish sediment-based concentrations that represent thresholds below which adverse effects on ecological receptors are not expected to occur." However, this text revision was not made. The document must be corrected.
- 3. Attachment 1, Page 34, Table 1.0-1.** This table lists the proposed Remedial Action Objectives (RAOs) for water and sediment as "Protect ... communities by identification of exposure to chemicals of concern (COCs) as unacceptable levels in the estuarine waters (surface waters)/sediments in the Portsmouth Naval Shipyard offshore Areas of Concern (AOCs)." While identification of such exposure is important, it is only a first step toward protection and does not constitute protection by itself. The RAOs must be revised.

4. Attachment 1, Page A-3, Table A-2-2.2a. The last footnote on the first page of the table states that a value of $\frac{1}{2}$ MDL is substituted for non-detect data. However, the reader has no way of knowing which of the concentrations listed in the table are actual measured values and which are $\frac{1}{2}$ MDLs. An appropriate qualifier must be added to identify the non-detect entries. Approximated values should also be marked with a qualifier. This comment also applies to Table A-2-2.4a that begins on Page A-13.

5. Attachment 3.6, Response to Comments on Interim Submittal. The Navy's response to SAPL's Comment Number 1 (Comment dated 6/11/01) refers the reader to the responses to MEDEP Comments 1, 2, and 3 (Comments dated 6/11/01). The MEDEP recently provided comments on the subject document in a letter dated 10/18/01. Regarding the Navy's response to MEDEP Comment 1, SAPL concurs with the MEDEP's Comment 9, dated 10/18/01, that the reclassification of some samples as non-detects should be discussed in the text. The effect of the reclassification on the PRG for copper should also be addressed. SAPL also concurs with MEDEP's Comment 10 (dated 10/18/01) that the Navy should clarify why it is willing to apply aspects of the NPDES program for porewater and sediment sampling at OU4, but not to seeps at OU6, and Comment 11 (dated 10/18/01) regarding clarifying the use of the term "biased" with regard to reference data.

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, Seacoast Anti-Pollution League
Iver McLeod, Department of Environmental Protection
Meghan Cassidy, Environmental Protection Agency
David R. Brown, Sc.D.