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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON TEST PITTING INVESTIGATION AT SITE 30 NSY PORTSMOUTH ME
2/4/2002
LEPAGE ENVIRONMENTAL SERVICES

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February 4, 2002

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

Subject: January 3, 2002 Responses to Comments on the September 2001 *Test Pitting Investigation Report, Building 184, Site 30, March/April 2001 Activity* Report

Dear Ms. Raymond:

We are submitting comments on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the Navy's January 3, 2002 responses to SAPL's November 16, 2001 comments on the September 2001 document entitled *Test Pitting Investigation Report, Building 184, Site 30, March/April 2001 Activity*. Many of the Navy's responses were satisfactory. However, issues or concerns that remain are presented in the following comments:

1. Original Comment 7. Page 1-5, Section 1.3 PREVIOUS INVESTIGATIONS. In its original comment, SAPL repeated concerns it and the Maine Department of Environmental Protection (MEDEP) had expressed previously regarding the Site Screening Report for Building 184 and on the Work Plan for the 2001 investigation. That is, contrary to the statement in the second paragraph on page 1-5 of the Test Pitting Investigation Report, the extent of contamination at the site has NOT been adequately defined. Available data is not sufficient to determine if and how contamination from Building 184 is affecting groundwater in the vicinity of the site. So far, only one round of groundwater sampling has been performed in the four monitoring wells installed at the site. Furthermore, while Figures 3-5 and 3-6 of the Site Screening Report indicate that monitoring well MW-04 is downgradient of Building 184, the well is actually installed in bedrock rather than the overburden. It is not apparent from the available data that the preferred pathway for contamination migrating from Building 184 would be from the overburden into bedrock at MW-04. Therefore, SAPL reiterates that it is not appropriate or accurate to make any statements in this investigation report about the adequacy of contaminant definition at Building 184 without qualifiers that accurately describe the limited extent of the site screening investigation. Therefore, the text should be revised on page 1-5 and in other similar passages. SAPL also concurs with the MEDEP that unless the Navy can provide conclusive data that contamination has never leaked from the acid-proof pit, additional monitoring wells will be required to test the breadth of the area considered to be downgradient. For this reason, it is important that the non-time critical removal action proposed by the Navy to address the contents of the pit also be designed and executed to determine if contamination has migrated from the pit.

2. Original Comment 9. Page 2-1, Section 2.1 DESCRIPTION OF TEST PIT FINDINGS. In Original Comment 9, SAPL stated that information must be added to the report concerning the how the water level within the pit fluctuated in response to pumping, how much water was removed by pumping, and if the water levels in the monitoring wells outside the building showed any fluctuations. The Navy's response includes suggested revisions to the report that add some of the needed information. However, the Navy's response also indicates that water seeped into the pit after pumping ceased, but that the water in the pit and groundwater are likely not hydraulically connected. This begs the question, what is the source of the water in the pit if it is not groundwater? The information provided in the Navy's response also does not demonstrate that water in the pit is not escaping to the outside environment. As noted in the comment on the previous page, the Navy must either provide conclusive information that the pit has not leaked, or collect sufficient groundwater data to demonstrate that the site has not adversely affected groundwater quality.

3. Original Comment 10. Page 2-11, Section 2.2.2.2 Summary of Data Validation Qualifiers. The Navy's response to SAPL's query about the likely effect of exceeding sample holding times on pH values measured in the lab indicates that measurements of pH in the field were in the same range as the laboratory values. Given the nature of the contamination at the site, this information should be added to the investigation report text.

4. Original Comment 12. Page 2-14, Section 2.2.5 <u>Discussion of Pit Water Data</u>. Part of the Navy's response to SAPL's original question about the source of the water in the pit states that the data available can not be used to conclusively prove that the pit water is not groundwater. The response goes on to state that any suggestions of possible sources of the water would be purely speculative at this point and may need to be investigated further only if the site risks warrant it. As noted in the comment on the previous page, the extent of contamination at the site has not yet been adequately determined. Therefore, there is insufficient information to determine if there are site risks. Additional investigation will be needed in order to identify site risks.

5. Original Comment 16. Appendix A. SAPL had commented that the Foster Wheeler Field Investigation Assistance Report in this section should have been labeled as "draft", not "final" as it was the first time the investigation assistance report has been available for review. The Navy's response stated that no comments had been received on the Field Investigation Assistance Report, so the Navy considers it "final". The Navy's response misses the point of SAPL's original comment. The Foster Wheeler report had never been submitted to the regulators or the Restoration Advisory Board (RAB) before. Therefore, it should have been considered a "draft". Only after comments are received and adequately addressed should a document be considered final.

6. Original Comment 17. General Comment. SAPL had originally commentated that any photos taken during the investigation should be included in the investigation report. The Navy responded that it did not feel that the photographs taken improved the understanding of the results of the investigation or the recommendations for the site, but that copies of the photographs would be provided to the regulators, as well as to RAB members who requested them. SAPL believes that the photographs are important for completing the documentation of the investigation. For that reason, copies should be provided as a part of the investigation report, so that anyone reading it now or at some future date can look at them and make their own decision regarding their usefulness.

7. New Comment. Attachment A, Pages 6 and 7 and New Appendix D Tables. The text on pages 6 and 7 does not accurately reflect what the new Appendix D tables show. The text at the bottom of page 6 and top of page 7 states "In the pit fill material analyses, the non-detected results were of the same order of magnitude as the target reporting limits." A quick check of the pit fill material table shows this is NOT the case. There are numerous instances where the target reporting limits are one or more orders of magnitude greater than the non-detects. The reverse is also true for a number of other compounds. The text then goes on to discuss results for pit water samples. Again, what is shown in the table is not accurately presented in the text on page 7. The text must be corrected. We also found the term "target reporting limits" to be confusing. Why not just refer to "screening criteria", which is what the target reporting limits are based on?

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: James Horrigan, SAPL
Iver McLeod, MEDEP
Meghan Cassidy, EPA

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