N00102.AR.002302
NSY PORTSMOUTH
5090.3a

LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE MARCH 2002 DRAFT FINAL TEST PITTING INVESTIGATION FOR SITE 30 NSY PORTSMOUTH ME
4/4/2002
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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

April 4, 2002

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

Subject: March 2002 Draft Final *Test Pitting Investigation Report, Building 184, Site 30, March/April 2001 Activity* Report

Dear Ms. Raymond:

We are submitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the March 2002 Draft Final document entitled *Test Pitting Investigation Report, Building 184, Site 30, March/April 2001 Activity*.

1. General Comment. The Maine Department of Environmental Protection (MEDEP) and SAPL have commented on several previous occasions that the extent of contamination at Site 30 has not been adequately defined, and that available data are not sufficient to determine if and how contamination from Building 184 is affecting groundwater in the vicinity of the site. Both MEDEP and SAPL have stated that additional monitoring wells will likely be required at the site. However, the Navy's recommendations place the priority for action at Building 184 on performing a non-time critical removal action within the building first, and then evaluating the need for any additional investigation. SAPL supports performing the removal action first as this will address potential risks to people currently working in the building.

2. Pages ES-3 & 4-2. The Navy's recommendations for actions at Site 30 are summarized in the bullets on pages ES-3 and 4-2. The second bullet clearly states that the remedial investigation [if performed] would address the nature and extent of contamination *within* [emphasis added] the pit. However the third bullet is too vague to be meaningful. SAPL suggests that the third bullet be revised to clarify what the additional investigations would likely address, such as the nature and extent of contamination outside the pit.

3. Page 2-2, Section 2.1.1 <u>Crystal Observations</u>. SAPL appreciates the inclusion of photographs in the report, and suggests the reader be referred to Appendix A in this section. The term "nondescript" used to describe the odor noted during the investigation is confusing. If an odor was noticed, it must have had some notable characteristic(s). Please clarify.

4. Page 3-4, Section 3.4 SUMMARY OF SCREENING-LEVEL RISK ANALYSIS. The sentence comprising the first bullet is confusing and should be revised. It is not clear what is exceeding the Shipyard background concentrations.

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