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LETTER REGARDING U S EPA REGION I COMMENTS ON THE DRAFT DATA QUALITY
OBJECTIVES FOR SITE 34 NSY PORTSMOUTH ME
4/8/2002
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

April 8, 2002

Mr. Frederick J. Evans, P.E.
Remedial Project Manager
Engineering Field Activity Northeast
10 Industrial Hwy., Mail Stop #82
Lester, PA 19113-2090

Re: Draft Data Quality Objectives (DQOs) for Site 34
Portsmouth Naval Shipyard
Kittery, Maine

Dear Mr. Evans:

The United States Environmental Protection Agency (EPA) has reviewed the draft version of the Data Quality Objectives (DQOs) for Site 34 at the Portsmouth Naval Shipyard in Kittery, Maine.

EPA's comments on the above-mentioned DQO package are provided in Attachment I to this letter.

If you have any questions regarding this matter, please contact me at (617)918-1387.

Sincerely,

A handwritten signature in cursive script that reads "Meghan F. Cassidy".

Meghan F. Cassidy
Remedial Project Manager

Enclosure

cc: Marty Raymond/PNS
Iver McLeod/ME DEP
Carolyn Lepage/Lepage Environmental
Deb Cohen/Tetra Tech NUS
RAB Members

ATTACHMENT I

The following are EPA's comments on the draft version of the Data Quality Objectives (DQOs) for Site 34 at the Portsmouth Naval Shipyard in Kittery, Maine.

General

1. The introductory paragraph of the DQO materials indicates that the data quality objectives as presented in the package are put forth to support a non-time critical removal action. EPA notes that the document also puts forth a goal of determining if groundwater has been impacted from past activities at Site 34. It is not clear whether this DQO package is meant to support a Site Screening Investigation as well as support a non-time critical removal action. In several places, it appears that this may be a goal but this is not clear from the information provided. This issue needs to be clarified since it impacts design of the study.

Specific

2. Page 3, paragraph 1: EPA notes that since Site 34 is a new site, the contaminants of concern (COC) identified for the off-shore area adjacent to the site may need to be revisited. For example, EPA does not recall that pesticides are considered a potential COC in the existing off-shore documents. However, data collected to date from Site 34 may result in the inclusion of pesticides (or some pesticides) as COCs in the off-shore area adjacent to Site 34. While this does not impact the potential removal action, it does need to be considered for site screening or remedial investigation work.

3. Page 4, paragraph 2: 4,4'-DDT should be carried forward as a potential COC. Updated Region 1 risk assessment guidance/policy does not consider it acceptable to drop COCs based on a comparison to background. In particular, this would not be appropriate for Site 34, since the building was historically used as a pesticide storage area.

4. Page 4, paragraph 6: EPA notes that the existing Preliminary Remediation Goals (PRGs) may not account for all COCs. The PRGs were developed based on the list of COCs at the time that the PRGs were developed. The text should clarify this fact.

5. Page 5, Problem Statement, bullet #2: It is not clear why data on groundwater and sediment are needed at this time to support a non-time critical removal action. The problem statement as outlined under this bullet seems to go beyond what is necessary to develop an EE/CA. However, it is not clear whether the assessing impacts of contaminants on the environment is intended to meet the requirements of a Site Screening Investigation. The intended purpose need to be further discussed and clarified.

6. Page 6, Decision Statement, Principal Decisions, (B): This decision statement seems to imply that the intent of this work is to support a Site Screening Investigation at Site 34. If this is the case, additional information should be discussed in this DQO package. Please clarify.

7. Page 7, Data Quality Objective Step 3, Data required for groundwater and sediment impact assessment: According to the information provided in this package, groundwater has not been sampled at Site 34 in the past. Therefore, it is not clear that the limited list of analytes is appropriate. This concern is related to the fact that it is not clear as to the objective of the groundwater assessment. This needs to be clarified before EPA is willing to consider a limited list of constituents for analysis.

8. Page 9, Principal Decision Rules: The note here should clarify that if residual contamination exists following the removal action, the Navy will need to show that the residual contamination does not present an unacceptable risk.

9. Page 9, Principal Decision Rules, Screening level discussion: The proposed use of background levels as a screening tool may result in the Navy having insufficient evidence to address whether the residual risk after a removal action presents any unacceptable risks. In this case, the Navy will have to perform a Site Screening Investigation to determine whether the site should move into the RI/FS process. The future implications of the proposed use of background during a removal action should be evaluated to avoid the need to duplicate work in the future.

10. Page 10, Principal Decision Rules, (B): As stated above, it is not clear why the impact to groundwater is being considered if the sole intent of the effort is to support a removal action. If the proposed work is meant to address a Site Screening Investigation, EPA does not believe that the limited analysis proposed for groundwater is sufficient.