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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
THE MARCH 2002 DRAFT DATA QUALITY OBJECTIVES NSY PORTSMOUTH ME
4/12/2002
LEPAGE ENVIRONMENTAL SERVICES

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April 12, 2002

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

Subject: Review of March 2002 Draft *Data Quality Objectives (DQOs)* for Site 34

Dear Ms. Raymond:

We are transmitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) on the March 2002 Draft *Data Quality Objectives (DQOs)* for Site 34.

1. General Comment. SAPL concurs with the majority of the comments presented in the Maine Department of Environmental Protection's (MEDEP's) letter dated April 10, 2002, and the U.S. Environmental Protection Agency's (USEPA's) letter dated April 8, 2002, and will not duplicate the agencies' comments except where SAPL feels additional emphasis is needed.

2. Page 1, Opening Paragraph. The first sentence in the document states that the DQOs are provided to support a non-time critical removal action for the site. However, the Potential Actions for Principal Questions and Decisions Statements: Principal Decisions sections on page 6 identify a second, more far-reaching goal. Principal Decision A on page 6 clearly focuses on the possible removal of the soil/ash pile adjacent to Building 62. The second Principal Decision (Decision B) is to determine if a Remedial Investigation/Feasibility Study (versus No Action) is needed at Site 34. While the DQOs outlined in the document are (with minor revisions) adequate to address possible removal of the ash pile, the DQOs are not sufficient to determine if no other action would be required at the site. As the MEDEP points out in comment 1, other potential sources (such as the tar pit mentioned on page 2) may exist at the site. Furthermore, the data gathering identified in the DQO document is insufficient for making a No Action decision. Other potential sources would have to be considered and additional site work performed before a determination of No Action could be made. The DQO document must be revised to clearly identify up front what the DQOs are being developed for, and if the DQOs are intended to describe the basis for a Site Screening Investigation, additional information and investigation will be required.

3. Page 2, DQO Step 1: State the Problem, Site History. Activities (and associated potential for contamination) taking place at the site since 1930 are not described adequately. SAPL is particularly concerned that pesticides are not being given adequate consideration in the DQO process, despite the fact the Building 62 was used for pesticide storage. This is especially troublesome given that Principal Decision B (see comment 2, above) could lead to No Action at the site. The DQOs must be revised to address the potential for pesticide contamination in both onshore and offshore areas associated with Site 34.

4. Pages 2 & 3, DQO Step 1: State the Problem, Previous Investigations at/offshore of Site 34. SAPL concurs with the USEPA's comment 2, dated April 8, 2002, that because Site 34 is a new site, Contaminants of Concern (COCs) for the offshore area adjacent to the site may need to be revisited. SAPL also concurs with USEPA comment 3 that DDT should be carried forward as a potential COC.

5. Page 4, DQO Step 1: State the Problem, Historical Site Chemical Data. The fourth paragraph lists metals that significantly exceeded both background concentrations and screening levels. SAPL has expressed reservations in a number of earlier comment letters about how the Navy developed background data for the Shipyard and how the data is used to evaluate specific sites. SAPL supports the USEPA position (USEPA comment 3, dated April 8, 2002) that USEPA's risk assessment guidance and policy do not find it acceptable to drop COCs based on comparison with background. Therefore, the passage in the fourth paragraph on page 4 should identify metals that exceeded screening levels, regardless of background concentrations.

6. Page 5, DQO Step 2: State the Decision(s). The second of the Principal Study Questions at the bottom of page 5 focuses on the impact on groundwater and sediment by source(s) at Site 34. However, the DQO document does not address any potential source(s) other than the ash pile. If this second Principal Study Question is correct, the DQO document will require significant revisions to ensure that this Principal Study Question can be answered with confidence in the future.

7. Page 7, DQO Step 3: Specify Inputs to the Decision(s). SAPL concurs with MEDEP and USEPA comments on the Inputs to Principal Decisions section, particularly that it is premature to limit parameters for testing at this stage. As currently written, the data inputs required for groundwater and sediment impact are not sufficient to make a decision regarding No Action. If the Navy intends to evaluate potential site impacts to groundwater and sediment, in addition to identifying other site-related sources, more analytical testing should be performed to characterize the ash. Additional information regarding site geology and hydrogeology is also needed.

8. Page 8, DQO Step 4: Establish the Study Boundaries. The boundaries for Principal Decision B should encompass sediment in the offshore area adjacent to Site 34, as impacts to sediment offshore of the site are specifically included in the Decision Statement on page 6.

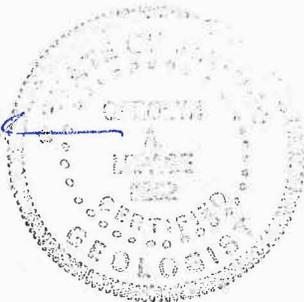
9. Page 11, DQO Step 7: Sampling Plan Design. The second paragraph on page 11 includes the statement that a relatively minor variation in chemical constituents of the ash may be expected as the ash and residue from the [gasification] operation would be similar over time. However, the information presented in the Site History section on page 2 indicates a number of unknowns about past operations at the site. For example, if a gas purifier was used during the oil gasification, the waste generated would have contained chemicals (such as cyanides) that differ from those in ash generated from coal combustion. There is no information presented regarding potential contamination from activities (such as pesticide storage) after 1930. Therefore, it would be premature to state that the chemical composition of the ash should vary only minor amounts. Furthermore, there is data from only one ash sample so far, and no ash sampling is proposed in the DQOs. If the Navy intends to evaluate the potential impacts of the ash on groundwater and other media, additional characterization of the ash is needed.

The third paragraph on page 7 touches upon erosion and redeposition as a means to spread contamination to the north. Will the Navy evaluate potential windblown transport and deposition as well? The fourth paragraph discusses evaluation of groundwater using monitoring wells. A single down-gradient groundwater sampling point will not be sufficient to determine if there have been site impacts to groundwater. More monitoring wells will be needed.

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, MEDEP
Meghan Cassidy, USEPA