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LETTER REGARDING MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION REVIEW COMMENTS ON THE DRAFT ENGINEERING ESTIMATE/COST ANALYSIS FOR SITE 30
NSY PORTSMOUTH ME
7/9/2002
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

July 9, 2002

Mr. Fred Evans
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

re: Draft Engineering Evaluation/Cost Analysis (EE/CA), Site 30 (Building 184), Portsmouth Naval Shipyard, Kittery, Maine, May 2002

Dear Fred:

The Maine Department of Environmental Protection has reviewed the document referenced above. The Department's comments follow.

General Comments

1. The Department agrees with the removal action alternatives that were considered, the results of alternative screening, and the action alternative recommended (Excavation and Off-Site Disposal). However, the MEDEP notes that 60 truck loads of very low pH materials will be transported on public roadways. This situation should be discussed with the RAB and the Town of Kittery. But we agree that a significant degree of uncertainty concerning thorough cleansing by in-situ flushing (Alternative 2) would be present. If that were not the case, Alternative 2 would be preferable over Alternative 3.

2. An important issue to the State with the present conceptual design of Alternative 3 is the proposed creation of a drain hole thorough the 8-inch subfloor underlying the acid pit, targeted for removal. We see no reason to open up a conduit for possible water migration to the water table, which was approximately 2 feet below the subfloor in July 1998. The bottom half of the fill material in the pit was found to be saturated in 2001, and standing surface water was discovered against the adjacent building wall. The site information indicates that the former acid pit is relatively tight hydraulically, although small leakages cannot be ruled out at this time. A subsurface drain should not be created in the floor, and instead, a full-depth sump pump structure should be constructed to remove any water that might collect within the pit confines in the future. Such modification of the conceptual design would help insure that the pit will not contaminate groundwater, if any part of the historic source is not removed for whatever reasons.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 764-1507

web site: www.state.me.us/dep

Specific Comments

3. Section 3.2, Removal Action Objectives, p. 3-3, 3-4

"The Navy also recognizes the presence of metal contaminants in the pit fill material and pit water that could pose a future risk to the groundwater at the site." " ..., the Navy has determined that a pro-active approach to the mitigating the potential for such a future release is warranted."

The Department is pleased that the Navy has chosen to address the possibility of future releases to groundwater. Please consider our suggestion under Comment 2 regarding not creating a potential pathway to groundwater from the pit.

4. Section 4.1, Development of Alternatives, p. 4-1, 4th bullet

"Institutional Controls, such as monitoring, were retained for incorporation into other alternatives."

This statement reads as if Alternative 2 (in-site flushing) and Alternative 3 (excavation and off-site disposal) do not involve ICs. Some type of monitoring over a period of perhaps two years will be needed for adjacent shallow groundwater and the potential re-occurrence of crystal growth. Please modify the above statement accordingly, and include institutional controls as part of both alternatives. Also see Comment 6.

5. Section 4.1.3, Alternative 3 - Excavation and Off-Site Disposal, p. 4-5, 7th bullet

"Concrete coring through the former acid pit concrete substructure to prevent pit water from accumulating within the former acid pit after restoration."

In essence, this component of the proposed work creates a dry well for any future contamination to migrated to the very shallow groundwater table. MEDEP does not endorse this concept, and suggests that instead, a collection drain system with a sump pump be installed at the bottom of the pit excavation. Please also see Comments 2 and 3.

6. Section 4.3.3, under Implementability, p. 4-9, end of 1st paragraph

"Furthermore, long-term operation, maintenance and monitoring would not be required for this alternative."

Some type of monitoring over a period of perhaps two years would be needed for adjacent shallow groundwater and the potential re-occurrence of crystal growth; however, this would not likely become a long-term requirement. We would like to discuss this need with the Navy.

Please feel free to contact me at (207) 287-8010 if you have any questions.

Sincerely,

Iver McLeod
Project Manager
Bureau of Remediation and Waste Management

pc:

Denise Messier, MEDEP
Larry Dearborn, MEDEP
Meghan Cassidy, USEPA
Marty Raymond, PNS
Debbie Cohen, TtNUS
Peter Britz, RAB
Doug Bogen, RAB
Don Card, RAB
Alan Davis, RAB
Michele Dionne, RAB
Mary Marshall, RAB
Phil McCarthy, RAB
Jack McKenna, RAB
Diana McNabb, RAB
Onil Roy, RAB
Roger Wells, RAB
James Horrigan, SAPL
Carolyn Lepage, TAG Advisor
Claire McBane, NH F&W
File