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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON  
THE MINUTES FROM TECHNICAL MEETING TO DISCUSS REMEDIAL INVESTIGATION  
QUALITY ASSURANCE PLAN SITE 32 NSY PORTSMOUTH ME  
9/25/2002  
LEPAGE ENVIRONMENTAL SERVICES

# Lepage Environmental Services, Inc.

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September 25, 2002

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

Subject: Review of Minutes of August 13, 2002 *Site 32 Remedial Investigation Quality Assurance Project Plan* Technical Meeting

Dear Ms. Raymond:

We are transmitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) on the Minutes of August 13, 2002 *Site 32 Remedial Investigation Quality Assurance Project Plan* (QAPP) Technical Meeting. The comments in this letter are intended to supplement SAPL's September 16, 2002 comment letter regarding the Navy's July 2002 responses to comments on the April 2002 Draft QAPP.

**1. Pages 2 and 3, Introduction and Jamaica Cove Consolidation Update.** There was also an Action Item associated with the complaint from someone in the community about dust blowing from the work site. Marty Raymond was to contact RAB co-chair Doug Bogen as Doug was the person who received the complaint. At the end of the discussion about the complaint, Iver McLeod mentioned that he had forwarded pictures to Dawn Hallowell in the MEDEP's Portland office. Ms. Hallowell said the silt fence should be removed, even after getting an explanation from Foster Wheeler. Marty Raymond stated that the fence was then removed. This information should be added as well.

**2. Page 3, Background Information.** The information presented in the third bullet should be revised to clarify that the subsurface samples were not collected continuously down to the bottom of the fill. In the fifth bullet, our notes indicate that Dave Zwastetzky said that more slug tests would have to be done to get more hydraulic conductivity information.

**3. Page 4, Background Information.** The minutes should summarize the discussion that took place immediately after the Navy said it would provide copies of the sewer map. Fred Evans asked how to determine if the site was having an adverse impact. Meghan Cassidy replied that if there already was a release, it was a CERCLA issue. Fred pointed out that the Operable Unit 4

monitoring was being conducted. Meghan replied it's a DQO question - Is there an impact? Is it historical? Current? And if the building basements released to the environment, it's covered [by CERCLA]. Fred Evans pointed out that his treatment system says sump pump discharges to the system are not allowed, and asked if groundwater needed to be classified. While Megan suggested thinking about that, she also said that the purpose of the RI is to characterize risk if there are releases to the environment. She understands there's sticky funding to fix the storm water system. Debbie Cohen said that the survey was brought up to show that groundwater is getting into the system, and that the discharge is a mixture of storm water and groundwater. If there are no risks... Meghan stated that the issue wouldn't be resolved [at this meeting?] and that we need to hear more.

**4. Page 5, Decision Statement 4.** With regard to the first bullet, our notes indicate that, in response to Larry Dearborn's question about the locations of the 1996/97 points, there is an Action Item to survey the drive points that are still in place and to add the information to maps. Please revise.

**5. Page 5, Decision Statement 4.** In the fourth bullet, the basis for the statement that dye trace studies could be used should be added. Conrad Leszkiewicz had expressed concern regarding the dynamics of deposition - Are there high-velocity discharges that deposit fines further out? Also, regarding channels and chemical effects, where does it go?

**6. Page 6, Decision Statement 4.** The statement in the in the fifth bullet, "*Based on this, additional information on the extent of PAH concentrations in sediment is not necessary.*" is not correct. In fact, the Navy is to provide analysis to the team of PAHs versus background and do PAHs need to be evaluated in extent.

**7. Page 7, Decision Statement 1.** At the conclusion of the discussion of alpha and beta numbers and the adequacy sampling density, Rick Sugat stated that, while he thinks the boring density is OK, he was not in agreement with the Navy's alpha and beta rates and [it is] not a precedent. This information should be added to the minutes.

**8. Page 8, Decision Statement 1.** The fifth bullet should be amended to indicate that SAPL's Technical Advisor also expressed concern with a single round of sampling as a basis of decision-making, especially with recent comments on the variability of back-to-back sampling round results at Site 10. In addition, it was decided that the Navy would submit a proposal for an data comparison evaluation, and that there's no consensus that one round would be sufficient. This was shortly followed by the statement that the RPMs need to talk as the RI schedule may not be maintained.

Page 3 of 3, M. Raymond  
September 25, 2002  
Minutes, August 13<sup>th</sup> Site 32 Technical Meeting.

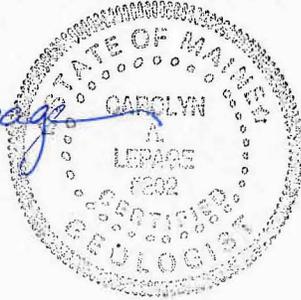
**9. Page 11, Summary of Resolution.** The phrase 'groundwater is storm water' in the last bullet must be rephrased to clarify the assumption. Is it that a significant amount of groundwater is infiltrating the storm water system?

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  
Mike Barry, USEPA