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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
DRAFT ADDITIONAL INVESTIGATION REPORT FOR SITE 10 NSY PORTSMOUTH ME
12/12/2002
LEPAGE ENVIRONMENTAL SERVICES

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December 12, 2002

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

Subject: Review of October 2002 Responses to Comments on the June 2002 Draft *Site 10 Additional Investigation Report*

Dear Ms. Raymond:

We are transmitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) on the Navy's October 2002 responses to SAPL's August 17, 2002 comments on the June 2002 Draft *Site 10 Additional Investigation Report*. The Navy's responses to a number of SAPL's original August 17th comments were satisfactory. Comments where issues or concerns remain are as follows:

1. SAPL Comment Number 2, Page ES-3, SUMMARY OF FINDINGS. In Original Comment Number 2, SAPL had concurred with the MEDEP that the data suggest groundwater flow at Site 10 is complex, and that without more groundwater samples, the distribution of contaminants at Site 10 likely will not be understood. In addition, the single detection of lead may not represent the maximum lead concentration in groundwater. Therefore, additional groundwater investigation is needed.

The Navy's response states that the monitoring wells were selected to represent groundwater at the site, and also that the lack of a prevalent lead plume was because the releases had occurred decades ago and the most mobile fraction of lead had already been removed. The Navy offered to develop a more rigorous statistical approach to demonstrate the adequacy of the current groundwater data set.

The monitoring wells and groundwater were discussed during a conference call on November 21, 2002. SAPL appreciates the opportunity to participate in that discussion with the Navy, EPA, and MEDEP. However, SAPL still believes that additional groundwater samples are necessary in order to adequately understand contaminant migration at Site 10 and the risks it may pose. Furthermore, SAPL believes that the existing wells are not located or designed for optimal

detection of contamination. The magnitude and rapidity of water level changes in wells in response to tidal fluctuations indicates that the material at the site is highly transmissive and that horizontal flow is likely more important than previously thought. Sampling the monitoring wells at low tide is likely not the most opportune time to intercept contamination. In addition, shallower well screens (assuming a downgradient location) are also more likely to intercept contamination from the highly contaminated soils in the building crawl space. Therefore, installation of additional shallow monitoring wells would also be desirable.

During the November 21st conference call, the Navy suggested that the offshore sediment sampling locations may need to be looked at (perhaps as part of the five-year review). While SAPL believes it is appropriate to revisit the current OU4 offshore monitoring locations as more on-shore site information becomes available, it is important to first understand how and where contaminants are migrating onshore in order to determine if potential offshore impacts are being monitored in the right places.

2. SAPL Comment Number 7, Page 4-5, Section 4.4 GROUNDWATER ANALYTICAL RESULTS. In its Original Comment Number 7, SAPL had concurred with the MEDEP's Comment Number 14 that the results of the groundwater sampling suggest that the general water chemistry was different between sampling events, and that the 9 to 10 feet of tidal purging of fill underlying the site apparently affected the repeatability of metal concentrations in groundwater. SAPL also pointed out that both MEDEP and SAPL had commented previously on the minimum number of sampling rounds needed to get representative, repeatable data for the site. SAPL had also expressed concern for the potential for groundwater levels associated with extremely high tidal levels to potentially mobilize contaminants from soils that are at other times above the water table. SAPL had concluded that additional groundwater sampling must be conducted at Site 10.

The Navy's response is the same as for SAPL's Original Comment Number 2. SAPL's position regarding the need for additional groundwater data is stated in Additional Comment Number 2, above.

3. SAPL Comment Number 8. Page 4-8, Section 4.5 SUMMARY OF THE NATURE AND EXTENT OF CONTAMINATION. In Original Comment Number 8, SAPL had echoed MEDEP's Comment Number 15 regarding the consistent detection of cobalt in groundwater samples, saying that the Navy should discuss on page 4-7 why the cobalt is there, where the cobalt came from, and why it is not likely to be related to the nuclear reactors on submarines. In addition, SAPL had asked the Navy to revise the last paragraph on page 4-8 to indicate that cobalt was statistically significantly elevated above background in both A and B sampling events.

SAPL concurs with the MEDEP's Comment Number 9, dated November 26, 2002, regarding the Navy's response.

4. SAPL Comment Number 10. Page 6-2, Section 6.0 SUMMARY, CONCLUSIONS, AND RECOMMENDATIONS FOR FURTHER ACTION. SAPL had commented that additional groundwater investigation and sampling must be conducted at Site 10 to understand the site's hydrogeologic regime and contaminant migration mechanisms, and to collect sufficient representative data to assess the risk posed by the site. Therefore, a bullet addressing those needs should be added at the bottom of page 6-2 and to the Recommendations for Further Action section on page ES-4.

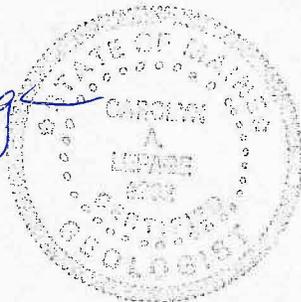
The Navy's response suggested a conference call and stated that additional text may be added to the report, depending on the outcome of the conference call. As noted in Comments 1 and 2 above, SAPL still believes that additional groundwater investigation and sampling is required.

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