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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
JANUARY 2003 DRAFT FINAL ADDITIONAL INVESTIGATION REPORT FOR SITE 10 NSY
PORTSMOUTH ME
2/4/2003
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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February 4, 2003

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

Subject: Review of the January 2003 Draft Final *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 January 2003 Draft Final *Site 10 Additional Investigation Report*.

1. General Comment. SAPL concurs with the comments in the Maine Department of Environmental Protection's letter dated February 3, 2003, and will not duplicate those comments below. SAPL also agrees with the U.S. Environmental Protection Agency's comments dated February 3, 2003, with one exception. The EPA states that "*The off-shore monitoring of sediments is deemed adequate to evaluate present and future impacts.*" While SAPL agrees that monitoring offshore sediments is appropriate for evaluating adverse impacts of Site 10 contamination, SAPL does not accept that the offshore monitoring, as currently designed and conducted, is adequate for future monitoring. The Navy agreed during a late-fall conference call to look at offshore sediment locations, perhaps as part of the five-year review. SAPL supports the Navy's recommendation. Evaluating the offshore monitoring locations in light of the recent Site 10 investigation results (such as the very high levels of metals contamination in shallow soils, the high hydraulic conductivity of Site 10 materials, and the dominance of horizontal groundwater flow) is a logical and appropriate action.

2. Page ES-4, RECOMMENDATIONS FOR FURTHER ACTION. The last bullet addresses potential impact from Site 10 on offshore surface water. The bullet should be amended to also address the action related to the site's impact on offshore sediments. Specifically, the Navy agreed to evaluate the offshore sediment monitoring locations (see Comment Number 1 above). This action should be added to the final bullet (or as a separate bullet) in the Recommendations for Further Action section in the Executive Summary and on page 6-3.

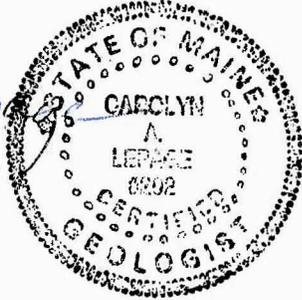
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If you have any questions regarding the comments above, please give me a call at 207-777-1049.

Sincerely,

Carolyn A. Lepage

Carolyn A. Lepage, C.G.
President



cc: James Horrigan, SAPL
Iver McLeod, MEDEP
Matt Audet, USEPA

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