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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE COMMENTS FROM
TECHNICAL CONFERENCE CALL FROM 14 JANUARY 2003 REGARDING QUALITY
ASSURANCE PROJECT PLAN FOR SITE 32 NSY PORTSMOUTH ME
2/7/2003
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

P. O. Box 1195 • Auburn, Maine 04211-1195 • 207-777-1049 • Fax: 207-777-1370

February 7, 2003

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

Subject: Review of Minutes of January 14, 2003, Technical Conference Call to Resolve
Comments on the October 2002 Draft Final *Site 32 QAPP*

Dear Ms. Raymond:

We are transmitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) on the Minutes of January 14, 2003, Technical Conference Call to Resolve Comments on the October 2002 Draft Final *Site 32 QAPP* [October 2002 Draft Final *Site 32 Remedial Investigation Quality Assurance Project Plan*].

1. Page 2, Topic, Discussion, and Resolution Number 1. Our notes indicate that the discussion concluded with Matt Audet saying that Conrad Leszkiewicz needed to look at the [revised/reprinted] figure to see if the sampling grid was adequate. Conrad then said that if the grid gets to the edge of OU4 Monitoring Station 4, it should be OK, also stating that the slag may not be the only source. It is important that the minutes be revised to identify what the EPA's consultant considered adequate at the time of the call, when the revised figure was not available. In addition, the Resolution section states that the revised figure will be submitted with the conference call minutes (and included in the final QAPP). There was no such figure attached to our copy of the minutes, so SAPL is not able to comment on the adequacy of the figure.

2. Pages 2 & 3, Topic, Discussion, and Resolution Number 2. The Discussion section should be revised to reflect the discussion of where to move soil boring SB-23, with reference to the proposed location and grid blocks shown on Figure 4-2 and/or the utilities. For example, Iver McLeod commented on location relative to the utilities, and Carolyn Lepage suggested that the boring be moved one grid block to the northeast of the proposed location. Also, the revision to Figure 4-2 that is attached to the Minutes should be labeled.

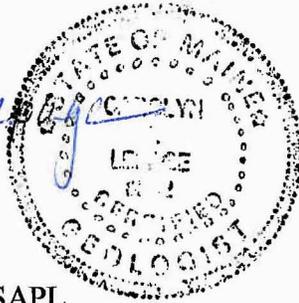
3. Page 5, Topic, Discussion, and Resolution Number 6. The Resolution section should have a Post-Meeting Note added (similar to the one at the top of page 3) that states that SAPL sent an email message on January 15th to Fred Evans, Iver McLeod, and Matt Audet requesting additional information regarding past and current experience with application of the Navy's proposed sampling decision process (or something close to it). In particular, what were the results, were results reasonable, appropriate, and defensible, how professional judgement did/did not enter the process, how large the datasets were, how exceedances of screening criteria were handled, and what problems were encountered. SAPL sent another email later in January requesting that the information be provided prior to the February 5th deadline for comments on the Site 32 QAPP Responses to Comments. As of February 7th, no response has been received from the Navy.

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
Matt Audet, USEPA