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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON  
THE DECEMBER 2002 ENGINEERING EVALUATION/COST ANALYSIS FOR SITE 30 NSY  
PORTSMOUTH ME  
2/13/2003  
LEPAGE ENVIRONMENTAL SERVICES

# Lepage Environmental Services, Inc.

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February 13, 2003

Alan Robinson  
Public Affairs Office  
Portsmouth Naval Shipyard  
Portsmouth, New Hampshire 03804-5000

Subject: Comments on the December 2002 *Engineering Evaluation/Cost Analysis (EE/CA), Site 30 (Building 184)*

Dear Mr. Robinson:

We are submitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the December 2002 *Engineering Evaluation/Cost Analysis (EE/CA), Site 30 (Building 184)*:

**1. General Comment.** SAPL supports the Navy's decision to pursue Alternative 3, the removal of the former acid pit's contents, because the action should protect the health of workers who use the building. The removal of pit material will also eliminate a potential source of groundwater contamination. However, SAPL also believes that monitoring must be performed after the removal is complete to assess possible regrowth of crystals. Otherwise, occupants of Building 184 could again be exposed to potential hazards. Monitoring is also needed to check the condition of groundwater adjacent to the pit as well as at down-gradient locations, and to determine if contamination from the pit has adversely affected groundwater quality.

**2. Page 2-3, Section 2.2 Site Location and Description.** The last two paragraphs of this section contain information about two floor drains, a clean-out plug, and a utility trough that are located within the footprint of the former acid pit, and surface drainage outside the building. SAPL does not recall that these features were discussed in the March 2002 *Test Pitting Investigation Report, Building 184, Site 30, March/April 2001 Activity*. Given the uncertainty regarding the source of the water found in the pit, and the potential for drains or trenches to be pathways for migration, SAPL believes that more information should have been provided in the EE/CA. For example, when were the floordrains installed? Where do they discharge? What is the clean-out plug connected to? How deep is the utility trench relative to water levels within the pit? What is the potential for contamination to migrate along the trench or via the floordrains? With regard to the discussion in the last paragraph of the surface drainage outside the building, how do the observations relate to the crystal growth inside the building? Is the Navy proposing that water from outside the building is leaking in through the base of the walls?

**3. Page 2-5, Section 2.4.3 Test Pitting Investigation.** The last paragraph in the section states that the Navy recommended in the Test Pitting Investigation Report that a non-time critical removal action be performed. It should have also stated that the Navy recommended that the need for additional investigation at Site 30 be evaluated following the removal action. Both SAPL and the Maine Department of Environmental Protection (MEDEP) have commented on several previous occasions that the extent of contamination at Site 30 has not been adequately defined, and that available data are not sufficient to determine if and how contamination from Building 184 is affecting groundwater in the vicinity of the site. Both SAPL and MEDEP have stated that additional monitoring wells will likely be required at the site. However, the Navy's recommendations in the Test Pitting Investigation Report placed the priority for action at Building 184 on performing a non-time critical removal action within the building first, and then evaluating the need for any additional investigation. In a previous comment letter, SAPL supported performing the removal action first because it would address potential risks to people currently working in the building. But it is also important to not lose sight of what should be done after the removal action is complete.

**4. Page 2-6, Section 2.5 Nature of Pit Contents and Source of Crystal Growth.** The sentence at the bottom of page 2-6 states that the elimination or reduction of the infiltration of surface water into the former acid pit (along with removal of pit materials) is expected to mitigate the growth of the crystals. What is the surface water the Navy is referring to? Where is it coming from and how does it get into the building and into the pit? What action does the Navy plan to take to address infiltration?

**5. Page 3-3, Section 3.2 Removal Action Objectives.** The last sentence on the page states that the Navy recognizes the presence of metal contaminants in the pit fill material and pit water could pose a future potential risk to groundwater. The acidic nature of the water in the pit is also of concern.

**6. Pages 4-4 & 4-5, Section 4.1.3 Alternative 3 - Excavation and Off-site Disposal.** The bullet at the bottom of page 4-4 should also address the utility trench, floordrains, and clean-out plug located within the footprint of the former acid pit. The sixth bullet on page 4-5 specifies visual inspection of the condition of the concrete pit walls. How will the Navy determine if the concrete itself is contaminated with just a visual inspection? If the concrete is contaminated, does the Navy plan to remove it? A final bullet regarding post close-out monitoring should be added. These comments also apply to the bullets on page 5-1.

**7. Page 4-9, Section 4.3.3 Alternative 3 - Excavation and Off-site Disposal.** The Implementability section contains the statement "Furthermore, long-term operation, maintenance, and monitoring would not be required for this alternative." What does the Navy consider to be "long-term"? As stated in comments above, SAPL believes that checking for recurrence of

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Site 30 EE/CA

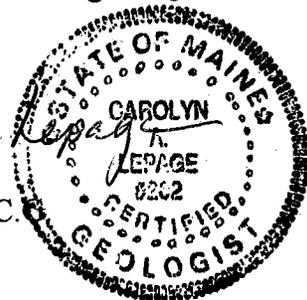
crystal growth and groundwater monitoring are needed after the removal action is complete to ensure that the Navy's remedy is effective. The Cost section also specifies that monitoring costs are not factored in to the estimated cost of the Alternative. Costs associated with monitoring should be added to provide a more realistic cost estimate.

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

Sincerely,



Carolyn A. Lepage, C.  
President



cc: James Horrigan, SAPL  
Iver McLeod, MEDEP  
Matt Audet, EPA  
Marty Raymond, PNS