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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
THE JANUARY 2003 DRAFT FINAL SITE INVESTIGATION QUALITY ASSURANCE
PROJECT PLAN FOR SITE 34 NSY PORTSMOUTH ME
2/28/2003
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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February 28, 2003

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

Subject: Review of January 2003 Draft Final *Site 34 Site Investigation Quality Assurance Project Plan*

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 34 Site Investigation Quality Assurance Project Plan (QAPP)*:

- 1. Ash Removal Action.** SAPL supports the Navy's proposal to remove the ash pile and associated contaminated soil at Site 34.
- 2. Use of Background Data in Decision-Making.** SAPL concurs with the U.S. Environmental Protection Agency's position, as stated in the agency's letter dated February 26, 2003, regarding the use of background data to screen out chemicals from further consideration at Site 34. As SAPL has stated in numerous previous comment letters, including Comments Number 2, 8, 11, 12, and 13 in its December 29, 2002 letter on Responses to Comments on the August 2002 Draft Site 34 QAPP, concentrations of potential chemicals of concern should be compared with appropriate screening levels. Chemicals should not be eliminated from consideration based on comparison with background concentrations alone.
- 3. Floordrains/Outfalls.** In its response to SAPL Comment Number 1 (dated December 29, 2003) regarding the need to investigate the site's drainage system as a possible migration pathway, the Navy states it thinks there is a sanitary sewer connection in the lavatory and there may be two storm sewer drains in the storage areas, and that the Navy will confirm this information. SAPL is encouraged that the Navy has found additional information on floordrains and outfalls at Site 34 and will investigate further. The drainage system may provide a pathway for contaminants (such as pesticides from storage/handling/mixing activities) to be migrate to the offshore environment. Elevated concentrations of PAHs and pesticides are known to occur in the monitoring locations immediately offshore of Site 34. However, since specific information

regarding how the Navy would investigate the drain system was not provided, SAPL cannot be more specific in its comments on the Navy's approach or methods. In general, SAPL is concerned with not only the current configuration of the drainage system, but also with the historic layout. For instance, has the system been altered since the 1960s-1980s period when pesticides were stored and handled at Site 34. Another consideration is that breaks, cracks, loose fittings, etc., in the drainage system might have allowed contaminants to leak into the subsurface environment at the site.

4. Pesticide Handling/Mixing/Storage Activities. SAPL had commented on the need to investigate potential adverse environmental impacts caused by the historic pesticide handling and storage in Comments Number 1, 3, 6, 14, and 15 in the December 29, 2002 letter. In its response to Comment Number 1, the Navy asked SAPL for suggestions on additional areas to investigate beyond those already proposed. As noted in Comment Number 3, above, SAPL believes the Navy's investigation of floor drains and outfalls would help address the question of potential migration pathways for pesticides, although SAPL cannot comment on the specifics of the Navy's approach and methods. However, with an appropriate level of effort to determine where the drain system is located, and with appropriate sampling of areas possibly impacted, the impact of the potential migration pathways can be evaluated.

With regard to other areas to cover, the Navy knows that pesticide storage and handling occurred within the buildings, but doesn't know exactly where within the buildings. There has been an adverse impact to offshore sediments, although the link to an on-shore source at Site 34 has not yet been established. SAPL also notes that concentrations of several pesticides were detected in the ash adjacent to the building, suggesting the possibility of pesticide disposal or handling at locations other than just inside of the buildings or at the wash pad. Additional surface and subsurface soil sampling locations to supplement those already proposed would help determine the nature and extent of adverse impact to soil. The Navy proposes compositing subsurface soil samples over a four-foot interval. SAPL suggests that analyzing samples over a two-foot interval would provide additional detail. There are also no monitoring wells proposed for down-gradient of the Building 62 Annex (see Figure 4-1). An additional well at that end of the site would help determine if there has been an adverse impact to groundwater.

5. Dioxin Sampling. SAPL suggests that if dioxin is detected in ash, that the underlying soil as well as also be tested to confirm contaminant migration has not occurred. Dioxins should also be included (assuming they were detected in the overlying ash or soil) in the confirmatory sampling that should be conducted once the removal action is complete. Comparison with background concentrations should not be the basis for eliminating dioxin from consideration. It is also not clear to SAPL how the decision to test groundwater samples for dioxin will be made. The decision information SAPL received only addressed soil and sediment.

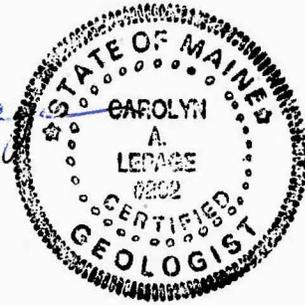
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If you have any questions regarding the comments above, please give me a call at 207-777-1049.

Sincerely,



Carolyn A. Lepage, C.G.
President



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

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