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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
APRIL 2003 DRAFT ADDENDUM REMEDIAL INVESTIGATION QUALITY ASSURANCE
PROJECT PLAN FOR SITE 32 NSY PORTSMOUTH ME
5/16/2003
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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May 16, 2003

Portsmouth Naval Shipyard
Code 106.3R, Bldg. 44
Attn: Ms. Marty Raymond
Portsmouth, New Hampshire 03904-5000

Subject: April 2003 Draft *Addendum to Site 32 Remedial Investigation Quality Assurance Project Plan*

Dear Ms. Raymond:

We are transmitting comments by Lepage Environmental Services, Inc., on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the April 2003 Draft *Addendum to Site 32 Remedial Investigation Quality Assurance Project Plan*. Our comments are as follows:

1. General Comment. SAPL concurs with the Maine Department of Environmental Protection's (MEDEP) comments dated May 16, 2003, and will not repeat those comments below except where particular emphasis is desired.

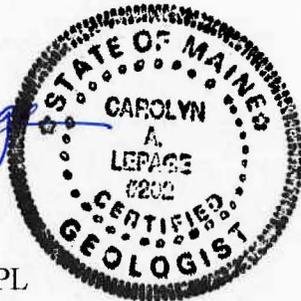
2. Contaminated Soil Removal. SAPL has stated in the past (see Comment Number 4, dated June 5, 2002, for example) that it is unacceptable for the Navy to leave such highly contaminated soil at the former CDC site. SAPL continues to believe that any concentrations of lead as high as 35,000 ppm must be removed, regardless of the average concentration in a 1/2-acre area. The potential risk to a future resident (gardening, children playing, etc.) is too great to allow such a high level of contamination to remain on-site. SAPL also believes that the process of calculating a site average based on area weighting is overly complicated. The Navy should focus instead on defining and removing the areas of highly contaminated soil.

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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