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NSY PORTSMOUTH
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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE COMMENTS ON THE
RECOMMENDATION REGARDING ANALYSES OF PHASE 2 AND 3 SOIL SAMPLES FROM
THE FORMER CDC INVESTIGATION NSY PORTSMOUTH ME
1/22/2004
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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January 22, 2004

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

Subject: December 30, 2003, Navy's Recommendation Regarding Analyses of Phase 2/3
Soil Samples from the Former CDC Investigation

Dear Ms. Raymond:

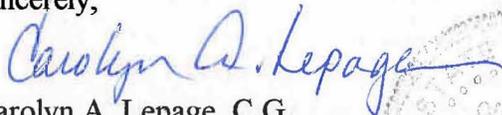
We are transmitting the following comments by Lepage Environmental Services, Inc., on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the December 30, 2003, *Recommendation Regarding Analyses of Phase 2/3 Soil Samples from the Former CDC Investigation*:

1. General Comment. SAPL concurs with the majority of the Maine Department of Environmental Protection's (MEDEP) letter dated January 22, 2004, and will not repeat MEDEP's comments in this letter.

2. Land Use Controls. SAPL is encouraged that the results of the 2003 sampling indicate lead concentrations well below the earlier 35,000 mg/kg detection at SS-107. However, half of the 2003 sampling results either exceed or are just under the USEPA residential screening level of 400 mg/kg and the MEDEP guidance of 375 mg/kg. For that reason, the Navy should take measures to prevent inappropriate development (residential, child care, recreational, etc.) and disturbance of soil at the site. At a minimum, land use controls for this site should be institutionalized in the Base Operating Instruction or equivalent record.

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

