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LETTER REGARDING U S EPA REGION I COMMENTS ON THE PHASE 2 REMEDIAL
INVESTIGATION FOR SITE 32 NSY PORTSMOUTH ME
3/1/2004
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

March 1, 2004

Mr. Frederick J. Evans, P.E.
Remedial Project Manager
Engineering Field Activity Northeast
10 Industrial Hwy., Mail Stop #82
Lester, PA 19113-2090

Re: ***Phase 2, Remedial Investigation, Site 32, Portsmouth Naval Shipyard, Kittery, Maine***

Dear Mr. Evans:

I have reviewed the January 2004 subject document prepared by Tetra Tech NUS, Inc, on behalf of the Navy. The Agency's comments are included as Attachment 1.

If you have any questions, please feel free to contact me at audet.matthew@epa.gov or 617.918.1449.

Sincerely,

Matthew R. Audet (signed)

Matthew R. Audet, P.G.
Remedial Project Manager
Office of Site Remediation and Restoration

cc. Iver McLeod/ME DEP
Marty Raymond/PNS
Deb Cohen/Tetra Tech NUS
Carolyn Lepage/Lepage Environmental (email)
RAB Members (email)

Attachment 1
US EPA Comments on Phase 2, Remedial Investigation,
Site 32, Portsmouth Naval Shipyard

1. Section 2.0: Groundwater Evaluation and Recommendation

The proposal to conduct another round of groundwater monitoring outlined in Section 2.0 of the Technical Memorandum is concurred with. However, EPA believes that sampling and analysis should be for all metals previously sampled for, not just arsenic, lead, and thallium. While those may be the only metals requiring additional data for performance of the statistical analysis, it is noted that there are a limited number of total sampling rounds for the installation. The additional groundwater sampling round should be for all metals of concern.

2. Section 2.0: Groundwater Evaluation and Recommendation

Page 2-7, Section 2-7 of the Data Package notes that well purging was performed during the last couple of hours prior to reaching low tide with groundwater samples being collected at that time (low tide). This timing complies with the procedures outlined in the March 2003 QAPP (Page 4-8, Monitoring Well Sampling). Review of the groundwater sampling logs indicates that samples were collected over a period from approximately 09:30 to 19:00 on May 7, 2003, suggesting that sampling of all groundwater wells was over a range of tides. The implication of this should be discussed.

3. Section 3.0: Outfall and Surface Water Evaluation and Recommendation

EPA questions whether the outfall surface water sampling was actually conducted as specified in the QAPP. Sampling of groundwater flowing out of the storm drains required that groundwater not be diluted by runoff. This was agreed to and spelled out in the QAPP on Page 4-12, Section 4.5. However, review of the precipitation records for Kittery, Maine for May 11, 12, and 13, 2003 show that 0.01, 0.30, and 0.05 inches of precipitation fell on those days. Weather records note thunderstorms occurring during those periods. This suggests rainfall over the previous night and morning, if not afternoon of the day of sampling.

Review of the surface water sampling logs indicates that sampling of the outfalls was performed during the early afternoon of May 12 (around 14:00 to 14:30). There is no discussion in the Technical Memorandum or accompanying Site 32 Data Package explaining the impact of precipitation and resulting runoff on dilution of the collected samples.

4. Section 6.0: Copper and Nickel Sediment Data Evaluation and Recommendation

While there were only two sample locations noted to be above the PRGs for copper and nickel (TP-SD-04 and TP-SD-12), several previously sampled locations not sampled again during this effort were also above those goals (MS-4-1, etc.). Further, several locations sampled during this effort had elevated levels of copper, although not exceeding the preliminary remediation goals. For instance TP-SD-25, TP-SD-28, TP-SD-30, TP-SD-34, TP-SD-35, and TP-SD-37 had levels of copper of 216, 274, 342, 317, 220, and 263 milligrams per kilograms (mg/Kg), respectively.

The values for copper from those locations are below the PRG of 486 mg/Kg. However, given sample variability, any consideration of remedial actions should consider those areas approaching the PRG levels in concert with those areas that have been identified to exceed PRG levels (486 mg/Kg). That is, evaluation of risk and remedial efforts should consider the near shore sediments as a unit, or segments, not just isolated sample locations. The concern is that contaminants in excess of those found in specific locations may exist between discrete sampling points and still pose a risk.