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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE COMMENTS ON THE DRAFT
PHASE 1 AND 2 REMEDIAL INVESTIGATION FOR SITE 32 NSY PORTSMOUTH ME
3/12/2004
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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March 12, 2004

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

Subject: Review of January 2004 Draft *Technical Memorandum, Recommendations Regarding Phase II of the Remedial Investigation for Site 32 and Site 32 Phase I Remedial Investigation Data Package*

Dear Ms. Raymond:

We are transmitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) on the January 2004 Draft *Technical Memorandum, Recommendations Regarding Phase II of the Remedial Investigation for Site 32 and Site 32 Phase I Remedial Investigation Data Package*:

- 1. General Comment.** SAPL concurs with the Maine Department of Environmental Protection's (MEDEP) and U.S. Environmental Protection Agency's (EPA) comments dated March 1, 2004, and will not duplicate those comments below except where additional emphasis is desired.
- 2. Analysis of Groundwater for Metals.** SAPL concurs with the EPA (Comment Number 1) and MEDEP (Comment Number 1) that groundwater samples collected during Phase II should be analyzed for all metals, not just the three metals (arsenic, lead, and thallium) identified as requiring additional data for statistical analysis.
- 3. Analysis for Organics.** MEDEP (Comment Number 4) disagrees with the Navy's position that "*Additional organics analysis for groundwater is not required because most organics were not detected and the SVOCs that were detected were infrequently detected at very low concentrations (well below the risk screening levels).*" As MEDEP points out, the 1998 results for several organics had detection limits that were many times higher than the screening criteria. This means that there is only one round (the 2003 round) of useful data for these compounds. Therefore, MEDEP wants to see another round of groundwater sampling for SVOCs and pesticides.

SAPL agrees with the MEDEP that additional sampling for organics should be performed during Phase II. Also, SAPL has commented on previous Site 32 documents (See Comment Number 63, dated May 2, 1999, on the *Site Screening Report* and Comment Number 9, dated May 22, 2002, on the *Quality Assurance Project Plan*, for example) about the need to properly qualify statements regarding frequency of detection and the number (and possibly magnitude) of screening criteria exceedances if detection limits are elevated. These comments apply to the Site 32 Phase I and Phase II RI documents as well. Qualifying statements are needed in the text and, where appropriate, as footnotes in Tables. The impact of elevated detection levels on risk estimates should also be discussed.

MEDEP expressed similar concerns about elevated detection limits exceeding screening levels for several pesticides in outfall and surface water samples in Comment Number 16. SAPL shares those concerns and believes that another round of outfall and surface water samples should be collected.

4. Comparison to Background Concentrations. SAPL concurs with MEDEP (Comment Number 25) that if concentrations of dioxin/furans exceed risk levels, then the associated risk must be addressed, regardless of facility background concentrations. SAPL has consistently gone on record that concentrations of chemicals at a site should be compared to risk-based standards in order to evaluate potential risk to a receptor, regardless of background concentration (see Comment Number 5, dated February 7, 2003, on the Site 32 QAPP, for example). As stated in Comment Number 6, also dated February 7, 2003, SAPL has a specific concern with the potential for windblown dispersion from the Teepee Incinerator site, where dioxins are known to occur, to affect concentrations at the Navy's background locations. The lack of information on the potential for contaminants from known sites at the Shipyard to adversely affect concentrations at the Navy's background locations reinforces SAPL's position that background data must not be used to eliminate contaminants from risk evaluation.

5. Deviations from the QAPP. EPA commented (Comments Number 2 and 3) on apparent deviations from the approved QAPP with regard to well purging and outfall surface water sampling. SAPL has commented on previous documents that deviations from a QAPP should be presented in the subsequent investigation report. The Site 32 Phase I Data Report identifies a number of differences from the QAPP, such as which locations were moved due to utilities, and where sample recoveries were inadequate. Are there any other deviations from the Site 32 QAPP that should be added to the Data Report?

6. Extent of Contamination. MEDEP commented on some unclear statements regarding how extent of contamination would be determined (Comment Number 8, for example). SAPL looks forward to the Navy's clarifications. Of particular concern is it is unclear if there is enough information on the vertical extent of slag or slag-impacted sediment. How will the Navy address the apparent lack of data on vertical extent?

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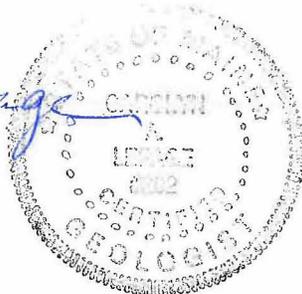
7. Site Conceptual Model. MEDEP provides some interesting observations regarding variations in groundwater chemistry results in Comment Number 37, and suggests one conclusion is that the subsurface physical/chemical conditions are affecting the mobility of metals. Will the Navy be developing a conceptual model for the site that will address these observations?

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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