

N00102.AR.002424
NSY PORTSMOUTH
5090.3a

LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE COMMENTS ON 2004
DRAFT PHASE 1 AND 2 REMEDIAL INVESTIGATION FOR SITE 32 NSY PORTSMOUTH ME
5/24/2004
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

P. O. Box 1195 • Auburn, Maine 04211-1195 • 207-777-1049 • Fax: 207-777-1370

May 24, 2004

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

Subject: Review of April 14, 2004, Responses to Comments 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*

Dear Ms. Raymond:

We are transmitting this letter on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the Navy's April 14, 2004, responses to comments 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) comments dated May 20, 2004, and will not duplicate those comments below except where additional emphasis is desired.
- 2. Date of SAPL Comments.** SAPL's comments 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* were transmitted in a letter dated March 12, 2004. The date in the section heading for the Navy's responses to SAPL's comments should be corrected.
- 3. Analysis for Organics.** SAPL shares MEDEP's concern (Comment Number 2, dated May 20, 2004) that MDLs exceed screening levels for a number of organic compounds. SAPL has long been concerned that elevated detection levels would lead to an underestimation of risk. MEDEP has requested that the Navy provide additional information to justify not sampling for the compounds. SAPL looks forward to reviewing that information.

4. Comparison to Background Concentrations. The Navy's response to SAPL's March 12th Comment Number 4 on comparison of site data with facility background concentrations recognizes that SAPL disagrees with the current Navy Policy for use of background data. It also states that the facility background dataset does not include any dioxin/furan samples located at the Teepee Incinerator site, which SAPL understands. However, in previous comments (see February 7, 2003 letter, for instance), SAPL has questioned 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. SAPL continues to be concerned with 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.

5. PCB Congener Data. SAPL concurs with MEDEP (Comment Number 6, dated May 20, 2004) regarding the necessity of obtaining dioxin-like PCB concentration data. These data are needed so that the RI risk evaluation does not underestimate risk.

6. Petroleum Contamination. SAPL agrees with the MEDEP (Comment Number 7, dated May 20, 2004), that visual identification alone of petroleum contamination in the area of TP-SB36 is insufficient, and that soil sampling for DRO analysis, at a minimum, must be performed.

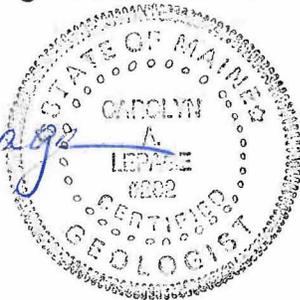
7. Extent of Contamination. SAPL agrees with the MEDEP (Comment Number 8, dated May 20, 2004) that the extent of contamination (including the vertical extent) must be understood before moving forward to the Feasibility Study where a remedy is selected.

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