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NSY PORTSMOUTH  
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LETTER REGARDING MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON THE DRAFT ENGINEERING EVALUATION/COST ESTIMATE FOR SITE 30  
NSY PORTSMOUTH ME  
5/28/2004  
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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May 28, 2004

Mr. Fred Evans  
Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mailstop 82  
Lester, PA 19113-2090

re: Draft Engineering Evaluation/Cost Analysis, Site 30, Portsmouth Naval Shipyard,  
Kittery Maine, April 2004.

Dear Fred:

The Maine Department of Environmental Protection has reviewed the document  
referenced above. The Department's comments follow.

**General Comments**

1. MEDEP agrees that Alternative 3 (Interim Periodic removal of Crystals and Pit Dewatering, followed by Excavation and Off-Site Disposal) is the most appropriate remedial approach, given the constraints of the source being located beneath the floor of an active base building. Our main concern is that the timetable for ultimately removing the soil source materials is not fixed, due to the inability of the Navy at this time to determine when Building 184 will be vacated. Because the contaminated soil may not be removed for a number of years (although page 4-10 provides an estimate of 3 years in the cost summary), potential leaching to the groundwater outside the pit walls/bottom will continue to exist if there is any breach in the pit liner. This scenario presumes that some contaminated water will remain in the pit in places and/or at various times.
2. We continue to doubt that the three existing monitoring wells near Building 184 are appropriately located or screened properly to intercept a plume of contamination in groundwater that the pit might have created. If the pit-water elevation has been higher than the water-table elevation and breaches in the containment structure have occurred (e.g., old pit drain to the sewer), hydraulic connection to groundwater outside the pit may have resulted in contaminant migration. Under Alternative 3, as well as Alternatives 2 and 4, the contaminant source could be actively leaching to groundwater for an unknown number of years until excavation is accomplished. Therefore, a groundwater monitoring network needs to be operated at least until the pit is excavated and containment conditions are known. At a minimum, the addition of one monitoring well as close as possible to the buried pit drain and sewer connection is necessary.

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Groundwater monitoring needs to be added as a subtask to Sections 4.1.2, 4.1.3, 4.1.4 and 5.0, with related costs included in the totals for these alternatives.

3. Is the herculite that is currently covering the area where crystals form rated to be resistant to acidic substances?

### **Specific Comments**

4. Executive Summary, p. ES-2

“A secondary RAO for the EE/CA is to select a remedy that minimizes interruption of the mission-critical activities in Building 184.”

The need to minimize interruption of Building 184 activities is a restraint, not a Remedial Action Objective. That is, it is not an objective to be achieved as an outcome of the remedial action. As stated in USEPA’s Risk Assessment Guidance for Superfund, Part D<sup>1</sup>, Section 4.1.1,

“As discussed in the NCP, RAOs should describe, in general terms, what a remedial action should accomplish in order to be protective of human health and the environment. RAOs are typically narrative statements that specify the contaminants and environmental media of concern, the potential exposure pathways to be addressed by remedial actions, the exposed populations and environmental receptors to be protected, and the acceptable contaminant concentrations or concentration ranges (remediation goals) in each environmental medium.”

5. 2.4.3, Test Pitting Investigation, p. 2-5, paragraph 2

“The Navy also recommends that the need for additional investigation to assess soil and groundwater potentially impacted by the pit contents be evaluated following the removal action.”

We agree that knowing the extent of contaminated soil is not a time-critical concern. However, MEDEP believes it would be in the best interest of all stakeholders to learn as soon as practical whether groundwater contamination has migrated outside the Building 184 footprint. We propose that the most logical location to investigate is adjacent to the buried drain sump that supposedly connected with the sewer. (Also see general comment above.) MEDEP does not want to wait another 3 years before the groundwater condition is investigated.

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<sup>1</sup> Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual, (Part D, Standardized Planning, Reporting, and Review of Superfund Risk Assessments), December 2001, Publication 9285.7-47. Available at <http://www.epa.gov/superfund/programs/risk/ragsd/tara.htm>

6. 3.4 Removal Action Schedule, p. 3-4

This section does not contain the information specified by USEPA in the document "Conducting Non-Time-Critical Removal Actions Under CERCLA."<sup>2</sup> This document states,

"In addition, this section should provide a general schedule of removal activities, including both the start and completion time for the non-time-critical removal action. This schedule can be an important factor in evaluating removal action alternatives based on their implementation times."

We recognize that the Navy is not sure when the building will be available for removal of the acid pit fill. However, it would be useful to know approximately how long the fill removal would take, how long to remove/move any equipment, etc.

7. 4.1.3 Alternative 3, p. 4-6, 2<sup>nd</sup> bullet

"Cleaning of the concrete substructure behind the acid-proof brick lining."

As previously discussed the concrete substructure must also be inspected for cracks and other damage that may have allowed acidic material to leach into the surrounding soil.

8. 4.3.3. Alternative 3, Implementability

"The installation of the pit dewatering system is expected to occur on weekends over a 1-month period when the building is temporarily available."

Would it be possible to perform the excavation during weekends? If so we see no need to delay the excavation. If not, then more detail needs to be added to this section to explain why not. For instance, does building equipment need to be moved to allow whatever excavating equipment is going to be used to approach the pit?

9. 5.0 Recommended Removal Action Alternative, p. 5-1

2<sup>nd</sup> bullet: "Removal of all equipment and facilities located within the building will be conducted by PNS."

Why is it necessary to remove all equipment and facilities from the building?

5<sup>th</sup> bullet: As stated above the concrete substructure must be inspected for damage in addition to being cleaned.

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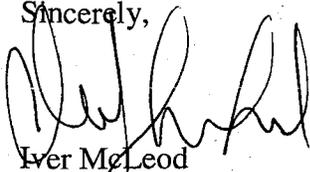
<sup>2</sup> Conducting Non-Time-Critical Removal Actions Under CERCLA, EPA/540/F-94/009, USEPA, December 1993.

10. Appendix A, Conceptual Design Calculation and Assumptions for Costing Input

- a) Soil/Concrete Properties – please clarify the phrase “In-Place to Loose in Truck.”
- b) Pit fill-material Disposal Characteristics – We believe it is premature to assume 100% of the fill material is non-hazardous based on one fill sample. However we recognize that the material will be properly characterized for disposal purposes.

Please feel free to contact me at (207) 287-8010 if you have any questions.

Sincerely,



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