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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE COMMENTS ON THE DRAFT  
ENGINEERING EVALUATION/COST ANALYSIS FOR SITE 30 NSY PORTSMOUTH ME  
5/31/2004  
LEPAGE ENVIRONMENTAL SERVICES

# Lepage Environmental Services, Inc.

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May 31, 2004

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

Subject: April 2004 Draft *Engineering Evaluation/Cost Analysis (EE/CA), Site 30 (Building 184)*

Dear Ms. Raymond:

Lepage Environmental Services, Inc., (Lepage) is submitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the April 2004 Draft *Engineering Evaluation/Cost Analysis (EE/CA), Site 30 (Building 184)*:

**1. Proposed Alternative.** SAPL agrees with the selection of Alternative 3, Interim Periodic Removal of Crystals and Pit Dewatering, Followed by Excavation and Off-Site Disposal, as the best of the four alternatives presented in the EE/CA. As stated in SAPL's August 29, 2003 letter regarding the July 2003 Proposal on the Site 30 Action Memorandum, it is paramount to protect the people occupying Building 184. The crystal growth must be monitored and removed at a frequency that will ensure the protection of worker health and safety.

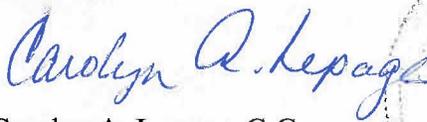
**2. MEDEP Comments.** SAPL concurs with the Maine Department of Environmental Protection's comments dated May 28, 2004, and will not repeat the agency's comments below except where additional emphasis is necessary. As noted below, some of the issues the MEDEP raises in its May 2004 letter are not new with regard to investigation and proposed action for Site 30.

**3. Timetable for Action.** SAPL had expressed disappointment in its August 29, 2003 letter that the removal of the pit materials would be delayed further due to the funding involved in the permanent relocation of the welding school that currently occupies Building 184. The timetable presented in the Draft EE/CA is still open-ended. SAPL shares MEDEP's concern (MEDEP Comment Number 1) that possible leaching of contaminants would continue until the Navy finally removes the material in the pit. Potential impacts to groundwater are discussed in the next comment.

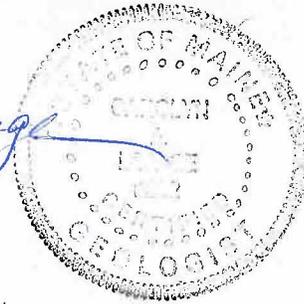
**4. Potential Impacts to Groundwater.** Both the MEDEP and SAPL have commented previously on the (in-)adequacy of the monitoring well network at Site 30 to determine potential site impacts on groundwater. SAPL has also commented previously on the need to evaluate possible contaminant migration pathways associated with drains, a utility trough, and other features at Site 30 (see SAPL's January 31, 2001, November 16, 2001, February 4, 2002, April 4, 2002, February 13, 2003, May 9, 2003, and August 29, 2003 comment letters). SAPL concurs with the MEDEP (Comment Number 2) that an adequate groundwater monitoring network (including at least one new well close to the pit drain and sewer connection) must be operated until the pit material is removed and the integrity of the pit structure can be evaluated. SAPL also agrees that the investigation of potential groundwater impacts (MEDEP Comment Number 5) should not wait until after the pit is excavated.

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