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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON  
MAY 2004 DRAFT FINAL SITE SCREENING INVESTIGATION REPORT FOR SITE 32 NSY  
PORTSMOUTH ME  
7/14/2004  
LEPAGE ENVIRONMENTAL SERVICES

# Lepage Environmental Services, Inc.

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July 14, 2004

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

Subject: Review of May 2004 Draft Final *Site Screening Investigation Report for Site 34*

Dear Ms. Raymond:

We are transmitting the following comments on behalf of the Seacoast Anti-Pollution League (SAPL) on the May 2004 Draft Final *Site Screening Investigation Report for Site 34* (SSI Report). Our review focused on the Navy's responses to previous comments that are included in Appendix E of the SSI Report and on the responses to SAPL's May 11, 2004, comments which the Navy sent out separately under a cover letter dated June 21, 2004.

**1. General Comment.** SAPL concurs with the Maine Department of Environmental Protection's (MEDEP's) comments dated July 9, 2004 (especially those regarding background data) and won't repeat those comments below.

The SAPL comment numbers listed for each topic below correspond to specific comments in SAPL's letter dated February 5, 2004, regarding the December 2003 Draft SSI Report.

**2. Drainage System (SAPL Comments 4, 7, 11).** In response to SAPL's questions regarding the utility maps consulted by the Navy, the Navy's June 2004 response states that the utility maps show both existing and abandoned utilities. SAPL believes that knowledge of historical drainage features (which may still exist today, even if not intentionally used for drainage) is needed to understand potential contaminant migration pathways for both the pesticides known to have been handled at Site 34 and the tar pit possibly located beneath Building 62. Therefore, copies of the utility maps should be included in the Final SSI Report.

**3. Vertical Distribution of Pesticides (SAPL Comments 18, 20, 21, 23).** The Navy's June 2004 response provides some information on the mobility and migration of pesticides in the environment: pesticides are not very mobile, tend to strongly adhere to soil particles, do not easily leach from soil to water, and [tend to] migrate through particulates in storm runoff or sediments. SAPL understands migration through particulates in storm runoff, but is not sure what the Navy means by migration through sediments. Please clarify.

Of greater import, however, are SAPL's unanswered questions regarding the vertical distribution of pesticides at the ash pile. SAPL's February 5, 2004, comments pointed out that ash disposal at Site34 reportedly ceased in 1930, and DDT was not used until 1939 (at the earliest), yet DDT has been detected at depths in excess of 6 feet below the ground surface (bgs) within and below the ash pile. SAPL questioned how this vertical distribution could be consistent with "topical application" of pesticides that are not very mobile in the environment. SAPL believes this is important because of the unknowns regarding pesticide handling and disposal at the site and the possibility of drainageways (including historic features) that could provide migration pathways. It is also unclear if pesticide-contaminated soil has been pushed around the site, during the construction and paving of the roadway, for instance. Therefore, SAPL's comments 18, 20, 21, and 23, dated February 5, 2004, still require responses.

**4. Reliability of Soil Sampling Method (SAPL Comment 21).** SAPL had questioned the reliability of all of the soil sampling and analysis results because the Navy had stated that the low concentration of pesticide reported beneath the ash layer at 34SB16 was highly likely to be due to overlying contaminated material sloughing off and being incorporated into the next sample interval. SAPL had also questioned what the sampling documentation showed regarding sloughing. The Navy's June 2004 response states that "Slough ... was easily distinguishable from undisturbed material and separated from the sample". If there is no documentation of slough occurring, then the paragraph at the end of the Normal Probability Plots section on page 2 of Appendix D (as well as other similar passages that might be elsewhere in the SSI Report) that states that sloughed material is likely the reason for very low detections of pesticides at 6 to 10 feet bgs in sample 34SB160610 should be deleted or revised appropriately.

**5. Appendix D.** SAPL had asked a number of questions about the literature values presented on pages 2 and 3 in the appendix, such as how application rates and methods, soil characteristics, vegetative cover, climate conditions, sample depths, and vertical distribution of concentrations compare with Shipyard data and conditions. The Navy should amend the text (per its June 2004 response) to state that information on application rates and method, climate, soil conditions, etc., are not available for comparison with Shipyard data and conditions.

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