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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
OCTOBER 2004 DRAFT SAMPLING AND TREATABILITY STUDY WORK PLAN FOR
OPERABLE UNIT 2 (OU 2) NSY PORTSMOUTH ME
11/11/2004
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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

November 11, 2004

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

Subject: Review of October 2004 Draft *Operable Unit 2 Sampling and Treatability Study Work Plan*

Dear Ms. Raymond:

Lepage Environmental Services, Inc., is submitting this comment letter on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the October 2004 Draft *Operable Unit 2 Sampling and Treatability Study Work Plan*. The comments below incorporate input from Summit Environmental Consultants, Inc. (Summit).

1. General Comment. SAPL concurs with the Maine Department of Environmental Protection's (MEDEP's) comments dated November 9, 2004, and the Environmental Protection Agency's (USEPA's) comments dated November 4, 2004; and will not repeat them below.

2. Page 2-2, Section 2.1.3 OU2 Description and History. The description of Site 6 should mention that the rock forming Henderson's Point was blasted in the past, as the Work Plan refers to "blasted rock" in subsequent sections (see page 3-4, for example).

3. Page 2-9, Section 2.3.1 Project Quality Objectives, Step 7 Optimize the filed investigation plan. Please clarify what "adequately representative" means with regard to the first three test pit samples. Does it mean that concentrations are similar to the highest levels previously detected at the sites, or something approaching an 'average' concentration?

4. Page 2-10, Section 2.3.2 Decision Rules. Please provide the basis for the assumption that lead and benzo(a)pyrene are indicators for the performance of the other inorganic and organic COCs.

5. Page 2-11, Section 2.3.2 Decision Rules. It is not clear if the Action Levels described on page 2-11 apply only to this Treatability Study or if they have been developed for all future actions at OU2. Please clarify.

6. Page 3-2, Section 3.2.1 Test Pits. Test pit OU2-TP104 should also be described at the bottom of page 3-2.

7. Pages 3-4 & 3-5, Section 3.2.2.2 Sampling Procedures. What measures will be implemented to control dust, as well as precipitation infiltration and runoff, during the test pitting?

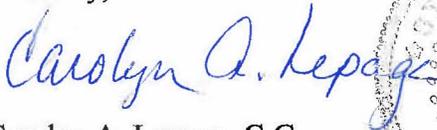
8. Page 3-11, Figure 3-1. What are the proposed soil borings shown on Figure 3-1? If they date from a previous investigation, they should be labeled and a reference should be cited so that the supporting data can be looked up readily.

9. Page 6-1, Section 6.1.2 Field Analysis Data Package Deliverables. When will the HASP, which is mentioned in this section, be provided for review? As noted in SAPL's April 2003 comments on the proposed field demonstration for Site 6, radioactive hazard monitoring should be addressed in the HASP. Engineering controls for dust management and suppression, as well as spill control measures and response should also be covered in the HASP.

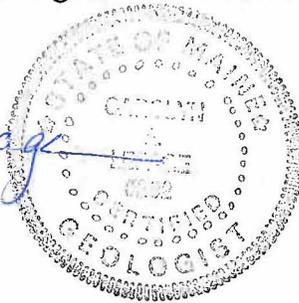
10. Appendix C. SAPL questions whether the heavy salt solution (Section 2.2.2.3) will adequately separate the clays from the sand, but that should be verified in the lab. Of greater concern is taking the bench scale results to the "real world". Although construction details and procedures are yet to be defined, dust control during soil separation and screening would be a particular concern. Control of the wash water and maintenance of screen openings while processing large quantities of soil are other areas of concern.

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
James Bouquet, P.E., Summit