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LETTER REGARDING U S NAVY RESPONSES TO MAINE DEPARTMENT OF
ENVIRONMENTAL PROTECTION COMMENTS ON THE DRAFT ENGINEERING
EVALUATION/COST ESTIMATE FOR SITE 3 NSY PORTSMOUTH ME

6/30/2005

TETRA TECH NUS



TETRA TECH NUS, INC.

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PITT-06-5-059

June 30, 2005

Project Number 4169

Mr. Matthew Audet
Environmental Protection Agency
Region I (Mail Code: HBT)
1 Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Mr. Iver McLeod
Maine Department of Environmental Protection
State House Station 17
Augusta, Maine 04333-0017

Reference: Contract No. N62467-94-D-0888 (CLEAN)
Contract Task Order No. 835

Subject: Response to MEDEP Follow-up Comments on
Draft (Revised) Engineering Evaluation Cost Analysis Report for Site 3
Portsmouth Naval Shipyard (PNS), Kittery, Maine

Dear Mr. Audet/Mr. McLeod:

On behalf of the U.S. Navy, Tetra Tech NUS, Inc. is pleased to provide to the U.S. Environmental Protection Agency Region I (USEPA) and to the Maine Department of Environmental Protection (MEDEP) 2 and 3 copies, respectively, of the responses to MEDEP follow-up comments on the draft (April 2004, revision 1) Engineering/Evaluation Cost Analysis (EE/CA) report for Site 30.

Based on discussions in August 2004 with the USEPA and MEDEP regarding site priorities, it was determined that Site 30 was a low priority compared to other PNS sites and the Site 30 EE/CA was put on hold until regulatory concerns for groundwater at the site could be addressed. However, the Navy would like to reduce the potential for crystal growth and potential for migration from the source to groundwater to the extent possible as part of a removal action for Site 30. Therefore, the Navy is recommending a removal action alternative (modified Alternative 4) that will include minimization of water entering the pit along with long-term periodic crystal removal and pit dewatering. The proposed text revisions related to this change are attached to the responses to comments. After receipt of comments on the proposed text revisions, the Navy will finalize the Site 30 Revised EE/CA and hold a 30-day public comment period on the final EE/CA.

Comments on the proposed revisions are requested by **August 1, 2005**.

For the Community Restoration Advisory Board (RAB) members; if you have any comments or questions on these issues, they can be provided to the Navy at a RAB meeting, by calling the Public Affairs office at (207) 438-1140 or by writing to:

Portsmouth Naval Shipyard
Code 106.3R Bldg. 44
Attn: Marty Raymond
Portsmouth, NH 03804-5000



TETRA TECH NUS, INC.

Mr. Matthew Audet
Environmental Protection Agency
Mr. Iver McLeod
Maine Department of Environmental Protection
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If you have any comments or questions, or if additional information is required, please contact Mr. Fred Evans at 610-595-0567 x 159.

Sincerely,

Deborah J. Cohen, P.E.
Project Manager

DJC/kf
Enclosure



TETRA TECH NUS, INC.

Mr. Matthew Audet
Environmental Protection Agency
Mr. Iver McLeod
Maine Department of Environmental Protection
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Electronic Copy via E-mail

ME Dept. of Marine Resources (D. Card)
Mr. Doug Bogen
Ms. Michele Dionne
Ms. Mary Marshall
Mr. Peter Britz
Ms. Diane McNabb
Mr. Alan Davis
NH Fish & Game (C. McBane)
Mr. James Horrigan (SAPL)

Hard Copy

EFANE, (Code 1823/FE, F. Evans) (4 copies)
PNS (Code 106.3R, M. Raymond) (2 copies)
Mr. Jack McKenna
Mr. Jeff Clifford
Ms. Carolyn Lepage
Mr. J. P. Kumar

Without Enclosure

Dr. Roger Wells
Mr. Onil Roy
PNS Code 100PAO
Y. Walker, NEHC
NOAA (K. Finkelstein)
U.S. Fish and Wildlife (K. Munney)
ATSDR (DOD-EJ/Carole Hossom)

**RESPONSES TO MEDEP FOLLOW UP COMMENTS DATED JULY 28, 2004
DRAFT REVISED ENGINEERING EVALUATION/COST ANALYSIS FOR SITE 30 (REVISION 1)
PORTSMOUTH NAVAL SHIPYARD, KITTERY, MAINE**

General Comments

1. **Comment:** The MEDEP agrees that more discussion with the Navy and other stakeholders is needed regarding groundwater concerns by the agencies and the timeframe to take action. MEDEP will be prepared to discuss/show why the existing monitoring wells may not be reliable for concluding that contaminated groundwater is not leaving the site.

Response: Comment noted.

Specific Comment

2. **Comment:** Navy Response to MEDEP Comment 2 and EPA Comment 2

" However, the Navy believes that by acknowledging the need to remove the pit water in the removal action alternatives, the pit water as a source of contamination to groundwater would be adequately addressed."

MEDEP realizes that the Navy will do its best to remove all pit water when the EE/CA is implemented; but in the meantime (several years), dissolved metal contaminants in low pH water may start or continue to leak through the pit walls or floor, and migrate away from Building 184. Acknowledging the need to further investigate possible groundwater contamination does not prevent or mitigate environmental degradation.

Response: The Navy recognizes that additional discussion will be necessary to resolve the groundwater concerns raised by the USEPA and MEDEP. Based on discussion with the USEPA and MEDEP regarding site priorities in August 2004, it was determined that Site 30 was a low priority compared to other PNS sites. The crystals within the building are covered; groundwater at Site 30 is not used for drinking; and the groundwater at Site 30 flows into Site 32 and would be addressed as part of Site 32. Therefore, there is no imminent concern for Site 30.

However, the Navy would like to reduce the potential for crystal growth and potential for migration from the source to groundwater to the extent possible as part of a removal action for Site 30. The Navy does not know when activities at Building 184 will be relocated and therefore a schedule for removal of the pit cannot be determined. Therefore, the Navy cannot recommend a removal action alternative at this time that includes removal of the pit. The draft revised EE/CA (dated April 2004) recommends Alternative 3 (Interim Periodic Removal of Crystals and Pit Dewatering followed by Excavation and Off-Site Disposal); however, the Navy will now recommend a modified Alternative 4 that will include minimization of water entering the pit along with long-term periodic crystal removal and pit dewatering. The proposed revised text for the identification, development, and analysis of removal action alternatives (Section 4.0) and for the recommended removal action alternative (Section 5.0) are attached. The associated revisions to the Executive Summary are also attached.