

N00102.AR.002464
NSY PORTSMOUTH
5090.3a

LETTER REGARDING MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON THE DRAFT ENGINEERING EVALUATION/COST ESTIMATE FOR SITE 3
NSY PORTSMOUTH ME
7/29/2005
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI

DAWN R. GALLAGHER

GOVERNOR

COMMISSIONER

July 29, 2005

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

re: Response to MEDEP Follow-up Comments on Draft (Revised) Engineering Evaluation Cost Analysis Report for Site 3, Portsmouth Naval Shipyard, Kittery, Maine, June 30, 2005.

Dear Fred:

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

1. The Navy has stated that they do 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."

It is unclear why the lack of a schedule necessitates that excavation of the pit be removed from the removal action. Although operations at Building 184 may now not be moved until 2009/2010 there never was any specific date for this to occur.

Please clarify the rationale for removing the excavation of pit contents from the removal action. Are there implications for leaving a non-time critical removal action uncompleted for several years? It seems the easiest route to follow would be to simply add "minimization of water entering pit" to Alternative 3 and leave everything else the same.

The MEDEP believes that excavation of the pit (and removal of any material/soil outside the pit that may act as a source) is the most reliable means of eliminating risk from this site.

2. The dewatering of the pit should prevent an ongoing discharge from the pit area, at least until a removal can be scheduled. However, it will not address any material that has already potentially migrated through cracks in the concrete floor or walls of the pit. The building area could remain a source after dewatering if contamination has moved beyond

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: 764-1507

the pit, as the water table is apparently only a foot or two below the base of the pit. This situation will need to be considered when a CERCLA remedy is chosen.

3. 4.1 Identification and Development of alternatives, p. 4-2, 3rd bullet (struck out)

Why has this paragraph been struck out? Since the Navy is not considering waterproofing/lining the pit for this removal action it is appropriate to leave it in.

4. 4.1.2 Alternative 2, p. 4-3, 1st bullet

“Initial pre-construction investigation to determine the actual source(s) of pit water and to confirm the suspected mechanisms of crystalline material growth, and the configuration of the physical layout and conditions of the sewer system associated with the former acid pit.”

The pre-construction investigation should also be included in Alternatives 3 and 4.

5. 4.1.4 Alternative 4, p 4-7

“...until a CERCLA decision is made for ~~the sitewaste materials in the pit.~~”

Why the strike-out? The CERCLA decision is made for the entire site, not just the waste materials in the pit (though that is the majority of the site). The first bullet following this paragraph has similar language but still contains the more appropriate “the site”.

6. 4.1.4 Alternative 4, p 4-7

“The following provides the assumptions used for this EE/CA.”

Actually, the text following this phrase is a list of the main components of the alternative, not assumptions used for the EE/CA. This phrase should be removed or revised.

7. 4.1.4, Page 4-8, 1st bullet

“Blocking of the inlet to the building floor drains, with appropriate notification to users.”

This action is highly recommended, in particular if the condition or destination of any drain is unknown.

8. Table 4-1, Waterproofing

The original language, “Because the pathway from surface water to pit water is not determined, waterproofing may not be warranted. However, this option must be reconsidered during design.” was struck out. The language, “May be useful in reducing the accumulation of water in the pit.” was added. However, we still haven’t determined the pathway from surface water to pit water so waterproofing still may not be warranted.

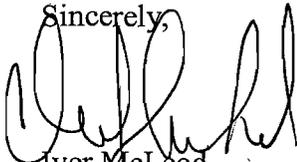
It may be better to reword the added language as, "May be useful in reducing the accumulation of water in the pit although the pathway from surface water to pit water has not been determined."

9. Section 5

The recommended alternative will serve to reduce ongoing discharge from the pit water to groundwater at Site 30. As stated earlier this option does not allow for any additional evaluation of the groundwater flow at Site 30, and does not address impacts outside of the concrete substructure, or in groundwater migrating from Site 30. These issues will need to be addressed before closure of the site can occur.

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

Sincerely,



Iver McLeod
Project Manager
Bureau of Remediation and Waste Management

pc:

Denise Messier, MEDEP
Chris Evans, MEDEP
Matt Audet, USEPA
Marty Raymond, PNS
Debbie Cohen, TtNUS
Peter Britz, RAB
Doug Bogen, RAB
Don Card, RAB

Alan Davis, RAB
Michele Dionne, RAB
Mary Marshall, RAB
Jack McKenna, RAB
Diana McNabb, RAB
Onil Roy, RAB
Roger Wells, RAB
James Horrigan, SAPL
Claire McBane, NH F&W
File