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EMAIL INCLUDING MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON SUPPLEMENTAL REMEDIAL INVESTIGATION AT OPERABLE UNIT 2 (OU
2) NSY PORTSMOUTH ME
11/19/2008
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

Gildersleeve, John CIV NAVFAC MIDLANT

From: McLeod, Iver J [Iver.J.McLeod@Maine.gov]
Sent: Wednesday, November 19, 2008 5:13 PM
To: Stevens, Kirk A CIV NAVFAC MIDLant, EV1; Cohen, Deborah
Cc: Gildersleeve, John CIV NAVFAC MIDLANT; Evans, Chris; Audet.Matthew@epamail.epa.gov
Subject: Draft comments on draft Supplemental Investigation RI for OU2

Here's what I have so far. I have a few more to write but I think these cover the most important issues. I'll try and get them out before I leave for the Yard tomorrow.

General Comment

1. The additional data generated during the 2007-2008 investigations have improved the characterization of the extent of impacted soils and groundwater at sites 6 and 29, and overall MEDEP agrees with the conclusions of the report. The "sub-areas" described in the remedial investigation (RI) report are more reasonable descriptions of the different operable units at the site.
2. At various times in the report the Navy indicates that lead found in the former location of the railroad is not related to DRMO Storage Yard Activities. The MEDEP disagrees with these statements. The railroad in the vicinity of the DRMO Storage Yard had no destination other than the storage yard and terminated within the storage yard. Presumably it was used to transport material to and from the DRMO. Therefore, MEDEP considers lead along the railroad lines that are in proximity to the DRMO to be related to DRMO activities.
3. The Navy also makes several statements indicating that lead concentrations closer to quarters than to the DRMO storage yard are attributed to residential activities including the use of lead-based paint. This may be the case however, any decision made to not include these locations as part of a remedy or removal action cannot rely solely on proximity to the quarters.

Specific Comments

4. Executive Summary, p. ES-2: In the first full paragraph please strike the word "potentially" from "Lead and copper are potentially greater..."
5. 1.3.3 History and Background, p. 1-8, 1st paragraph: Were any samples ever collected around the Bldg. 314 area for pesticide analysis?
6. 2.4.2 OU2 Geology, page 2-7, paragraph 2, Figures 2-4 to 2-10, and (from the OU 2 Additional Investigation Data Package, August 2008) Tables 2-1 and Appendix B.1 Boring Logs:

The comments in Table 2-1 provide notable items from the individual borings including sections of the boring where no recovery was reported, often corresponding to contacts with the interpreted "Rock Fragment Fill" on the cross-sections. MEDEP was unable to find a record of soil recovery in the boring logs, please clarify where this information was recorded.

As an example, OU2-128 has a noted lack of recovery from 6-8 feet in Table 2-1, and a contact between surface and rock fill is noted on cross section Figure 2-4, but neither of these things are noted on the boring log. OU2-163 is another example where the table indicates a lack of recovery but the log indicates a sample was recovered.
7. 2.6 Surface Water Use and Hydrology, p. 2-16, last full paragraph: "However, the top of the shoreline...are above the 100-year coastal flood zone; therefore wave action would not result in flooding of the site." Sea-level rise is a factor the Navy will need to take into account during the O&M phase of OU2 remediation. See comment below.
8. Fig. 2-1, DRMO Impact Area: The area labeled DRMO Impact Area is not the same area as originally defined when the OU was created. Therefore, it would be best to use a

different name for the area designated in Fig. 2-1.

9. 3.0 Nature and Extent, p. 3-3: "Other sources of contaminants in the OU2 area that may not be related to OU2 operations are associated with the historical use of railroads..." Please clarify this statement. It is hard to imagine that railroads that went into the DRMO area were not associated with OU2 operations.

10. 3.2.1 Magnitude, Distribution, and Extent of Pb Contamination, p. 3-8: Regardless of "typical" remediation levels the Navy must use MEDEP's Remedial Action Guidelines for lead in soil, i.e. residential = 375 ppm, adult worker and trespasser = 1000 ppm for comparison purposes (though as stated previously we are willing to use EPA's 400 ppm guideline for residential scenarios).

11. Section 3.2.1, Lead Contamination, page 3-8: The general extent of lead contamination is acceptable; however the restriction of source areas to detections in excess of 15,000 mg/kg seems unrealistic. The central portion of the DRMO storage area (the copper slag area) has multiple detections in the range of 10,000 mg/kg, and in conjunction with the presence of metal slag seen in some samples implies this is also a source area for the detections at the northern fenceline and along the southwestern boundary of the site.

MEDEP believes that another reasonable hypothesis for the lead detections to the west of the shoreline/DRMO area is that during the time the DRMO was unpaved, traffic from the site would have created a residual "plume" of contamination extending from the road/rail entrances to the site through transport of dust, mud, etc. In the context of the much more significant impacts within the DRMO, MEDEP agrees these locations can be separated from the site. The detection at DSB-6A, for example, should not be entirely discounted, as the heterogeneous nature of DRMO materials and the close proximity of the shoreline and the slag area suggest it is likely related to transport of material from those source areas.

12. 3.2.1, DRMO Impact Area: See Comments 2 and 3.

13. 3.2.1, p. 3-11: In the third paragraph, it appears that the locations of samples SS-24, SS-01, and SS-01-3 are to the west, not east, of the DRMO entrance.

14. Page 3-13 - logs do not support the statement that impacts may not extend to depth.