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LETTER AND COMMENTS FROM MAINE DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FEASIBILITY STUDY REPORT FOR OPERABLE UNIT 4 (OU 4)
NSY PORTSMOUTH ME
8/3/2010
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Admin.
National Ocean Service
Office of Response and Restoration
c/o EPA Office of Site Remediation and Restoration
(OSRR07-1)
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3 August 2010

Ms. Linda Coles
U.S. Department of the Navy
Facilities Engineering Command, Mid-Atlantic (Code OPNEEV)
Naval Facilities Engineering Command
9742 Maryland Avenue, Building Z-144
Norfolk, VA 23511-3095

Dear Linda:

Thank you for 1. The Feasibility Study Report for Operable Unit 4 (July 2010) and 2. The Interim Offshore Monitoring Plan for Operable Unit 4 (June 2010) at the Portsmouth Naval Shipyard, Kittery, ME both produced by Tetra Tech NUS, Inc. Comments are provided below only for the Feasibility Study.

1. As discussed in my 16 July 2010 comment letter concerning the Round 10 and Rounds 1-10 Monitoring Program Reports, NOAA's primary remedial interest is Monitoring Station-12. And the FS takes note of the need for a potential remedy there. Given the high organic and inorganic concentrations at all three long-term locations, especially locations 1 (organic) and 3 (inorganic), NOAA prefers a complete removal at MS-12A (i.e., MS 12A-04 as in Figure 7-3). Figure 2-3 showing concentrations above the PRGs both on the ramp and in the area surrounding the eelgrass supports such a remedy. Specifically, very high concentrations of lead and HMW PAHs are found here as shown in Figures 1-14 and 1-15, respectively. Of particular concern is the lead at AS12-SD107. Additionally, the complete removal is less expensive than the partial removal as subsequent annual costs for monitoring are not necessary.
2. As for MS-12B, dredging with off-yard disposal (MS-12B-03) as shown in Figure 7-5 is supported by the elevated lead in sediment concentrations shown on Figures 1-14 and 2-3. Of particular concern are locations AS12-SD12, AS12-SD109, and AS12-SD108, all showing high to very elevated lead concentrations.
3. Given the high subtidal organic contamination at Monitoring Station-1, NOAA recommends Alternative MS 01-03: hydraulic dredging and off-yard disposal.
4. MS-11, adjacent to the DRMO Storage Yard AOC, shows extremely high lead copper, and nickel at one intertidal location of three when reviewing the Trend Plots in Appendix B. Granted, there is little sediment and the sediment size is likely coarse. The latter results in much bioavailability, the former means that little needs to

- be removed; hence, NOAA recommends that the Navy remove this small area.
5. Other locations that need attention but in the form of a Monitored Natural Recovery remedy include MS-3, 4, 5, 8, and 9. We need to soon discuss the trigger that would either eliminate these locations from further monitoring or move them towards an engineered remedy.

Please contact me with any questions. I look forward with meeting with the Navy, EPA, and the State of Maine

Sincerely,

Kenneth Finkelstein, Ph.D.

CC: Matt Audet (EPA)
Ken Munney (USF&WS)
Iver Mcleod (MEDEP)