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NSY PORTSMOUTH
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LETTER AND COMMENTS FROM MAINE DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT SAMPLING AND ANALYSIS PLAN FOR OPERABLE
UNIT 2 (OU 2) PRE DESIGN INVESTIGATION NSY PORTSMOUTH ME
8/19/2010
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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August 19, 2010

NAVFAC MIDLANT
9742 Maryland Ave
Bldg Z-144, 1st Floor
Norfolk Va 23511-3095
Attn: Linda Cole

re: Draft Sampling and Analysis Plan for OU2 Pre-Design Investigation, Portsmouth Naval Shipyard, June 2010.

Dear Linda,

The Maine Department of Environmental Protection (MEDEP) has reviewed the Draft SAP for the OU2 Pre-Design Investigation. Our comments follow.

1. SAP Worksheet #5. Please correct my phone number (287-8010, not 787-8010).
2. SAP Worksheet #9, fourth bullet. This paragraph mentions data will be collected on 30 foot centers. P. 5 of the Executive Summary indicates soil samples will be spaced "approximately 25 feet apart". These should be consistent.
3. SAP Worksheet #9, Project Scoping Session December 8, 2009. Please correct the spelling of MEDEP geologist Gail Lipfert (also misspelled in Appendix D).
4. SAP Worksheet #9, Project Scoping Session December 8, 2009, Comments/Decisions, last bullet. Please explain what is meant by the terms vertical and horizontal phasing.
5. SAP Worksheet #10, 10.4, Conceptual Site Model. Please include a geologic section to the CSM that includes a description of soils/overburden, depth to bedrock, or depth to groundwater within the proposed extension of the OU2 area to the CSM.
6. SAP Worksheet #10, 10.4, Conceptual Site Model, Site History. What is the history of uses for Building 233?
7. SAP Worksheet #10, 10.4, Conceptual Site Model, Potential Sources of Contamination, Soil Sample SS-24. The Navy defends the exclusion of sample SS-24 from the OU2 investigation as the contamination at SS-24 cannot have resulted from DRMO activities due to the location of former Building 233. What steps does the

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Navy plan to take to investigate this unrelated contamination outside the DRMO boundary³

8. SAP #11, 11.4, Decision Rule #1, Lateral extent of surface contamination, first paragraph. The last sentence is incomplete.
9. SAP #11, 11.4, Decision Rule #1, Lateral extent of surface contamination.
10. The Navy states, "The project team assumes that for any area that has surface soil contamination in excess of the residential PALs, the likely remedy will be land use controls. These controls will extend vertically from the surface to include all the unsaturated soil, therefore, delineation of subsurface soil above the residential PAL is not required." This doesn't make sense. If the Navy wants to continue to use the area commercially/industrially then contamination greater than the occupational and construction worker PALs must be remediated. Perhaps after "contamination in excess of the residential PALs" the Navy meant to add "but less than the lower of the construction worker or occupational worker PALs".

Furthermore, terminating sampling after low levels of contamination are detected may result in omission of knowledge of greater contamination at depth. We recognize that the part of the CSM stating that contaminant concentrations are expected to decrease with depth makes sense conceptually. However, our acceptance of vertical phasing of samples was conditionally based on the Navy demonstrating this decreased concentration with depth using existing data. This is reflected in Appendix D which states, "Data for borings nearby the sampling area should be reviewed to see if the data show a vertical pattern in the data." However, the current draft SAP does not contain any evaluation of contamination concentrations with depth and our assessment of previous OU2 data shows that surface samples with lead concentrations less than 400 mg/kg can have lead concentrations greater than 400 mg/kg at depth.

11. Figure 4b, Human health conceptual site model. Under the heading, Secondary Release Mechanism, mechanisms such as snowplowing and previous construction/destruction activities should be listed.

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:

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