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NSY PORTSMOUTH
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LETTER AND COMMENTS FROM MAINE DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT INTERIM OFFSHORE MONITORING PLAN FOR
OPERABLE UNIT 4 (OU 4) NSY PORTSMOUTH ME
8/25/2010
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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August 25, 2010

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

re: Draft Interim Offshore Monitoring Plan for Operable Unit 4, Portsmouth Naval Shipyard, Kittery, Maine. June 2010

Dear Linda,

The Maine Department of Environmental Protection has reviewed the draft monitoring plan referenced above. Our comments follow.

1. The cover and title page should indicate that this is an update/revision to the 1999 Interim Offshore Monitoring Plan.
2. In the Executive Summary please briefly summarize the changes/updates in the monitoring plan (several monitoring stations were removed from the program, frequency of monitoring at some stations has changed, etc.).
3. 11.1 Problem Definition, p. 32: Please indicate that "acceptable levels" refer to the offshore IRGs (except for lead).
4. 11.2 Identify Information Inputs, p.32 : "...samples will be collected from select monitoring stations on a biennial basis, and at all monitoring stations every five years."

Please be more specific. Which stations will be sampled on a biennial basis and which stations will be sampled every five years. Does "all monitoring stations" refer to just the stations mentioned in this draft plan or to all monitoring stations MS-1 – MS-14? It would be helpful to include a table showing sampling frequency for each station.

Also, please add "...until a final remedy for OU4 is implemented in accordance with the Interim Offshore Monitoring Plan for OU4 (TiNUS, October, 1999)" at the end of the referenced sentence.

5. SAP Worksheet 17, p. 46: This section references modifications recommended in the Rounds 1-10 Interim Offshore Monitoring Program Report. It would be useful to include those recommendations as an appendix to the updated monitoring plan. The Executive

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Summary of the Rounds 1-10 Report provides a sufficient summary that could be used as the appendix.

6. Worksheet 17, p. 47: The SOP for Sediment Sampling referenced in the third paragraph is missing from App. B.

7. Worksheet 19, p. 53: Should EPA Method 7471A for mercury be listed under analytical method for metals in sediment?

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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