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LETTER REGARDING THE TRANSMITTAL OF INTERIM OFFSHORE MONITORING PLAN  
FOR OPERABLE UNIT 4 (OU 4) REVISION 1 NSY PORTSMOUTH ME  
11/15/2010  
TETRA TECH NUS



**TETRA TECH**

PITT-11-10-042

November 15, 2010

Project Number 112G02225

Mr. Matthew Audet  
USEPA, Region 1  
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Suite 100  
Mail Code OSRR07-3  
Boston, Massachusetts 02109-3912

Mr. Iver McLeod  
Maine Department of Environmental Protection  
State House Station 17  
Augusta, Maine 04333-0017

Reference: Contract No. N62470-08-D-1001 (CLEAN)  
Contract Task Order No. WE29

Subject: Interim Offshore Monitoring Plan for Operable Unit 4 (OU4), Revision 1  
Portsmouth Naval Shipyard (PNS), Kittery, Maine

Dear Mr. Audet/Mr. McLeod:

On behalf of the U.S. Navy, Tetra Tech NUS, Inc. is pleased to provide to the U.S. Environmental Protection Agency Region I (USEPA) and to the Maine Department of Environmental Protection (MEDEP) 2 and 3 copies, respectively, of the subject document and 1 CD each.

The USEPA indicated in an electronic mail message sent to the Navy on October 13, 2010 that the Draft Interim Offshore Monitoring Plan for OU4, Revision 1 was accepted that there were no further comments. The MEDEP provided comment on the draft plan. The MEDEP concurred with the informal responses to comments on the draft plan. The responses to MEDEP comments are attached. The Health and Safety Plan (HASP) for this project will be submitted under a separate cover at a later date.

If you have any comments or questions, or if additional information is required, please contact Ms. Linda Cole at 757.341.2011.

For the Community Restoration Advisory Board (RAB) members; if you have any comments or questions on these issues, they can be provided to the Navy at a RAB meeting, by calling the Public Affairs office at 207.438.1140 or by writing to:

Portsmouth Naval Shipyard  
Public Affairs Office  
Attn: Danna Eddy  
Portsmouth, NH 03804-5000

Sincerely,

Daniel C. Witt, P.E.  
Project Manager

DCW/clm

Enclosure

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Mr. Matthew Audet  
Environmental Protection Agency  
Mr. Iver McLeod  
Maine Department of Environmental Protection  
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**Electronic Copy on CD**

ME Dept. of Marine Resources (D. Nault)  
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Ms. Michele Dionne  
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Mr. Peter Britz  
NH Fish & Game (D. Grout)  
Mr. Jon Carter  
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**Hard Copy**

NAVFAC MIDLANT. (Code OPTE3-2/L.  
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**RESPONSES TO MEDEP COMMENTS DATED AUGUST 25, 2010  
DRAFT INTERIM OFFSHORE MONITORING PLAN FOR OU4, REVISION 1  
PORTSMOUTH NAVAL SHIPYARD, KITTERY, MAINE**

1. **Comment:** The cover and title page should indicate that this is an update/revision to the 1999 Interim Offshore Monitoring Plan.

**Response:** The cover will be revised to indicate that this is Revision 1 to the Interim Offshore Monitoring Plan (IOMP), as provided in the title page and on subsequent worksheets. The Executive Summary will be revised to clarify that Revision 1 is an update to the 1999 Interim Offshore Monitoring Plan (Revision 0). The revised Executive Summary is provided in the Attachment to these responses to comments.

2. **Comment:** 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.).

**Response:** The Executive Summary will be revised to clarify that Revision 1 of the IOMP is for interim offshore monitoring activities that will be conducted from Round 11 until a final remedy is implemented for OU4. The revised Executive Summary is provided in the Attachment to these responses to comments. Modifications to Revision 0 of the IOMP for Rounds 5 through 10 are summarized in Table 1-2 of the Rounds 1 through 10 Interim Offshore Monitoring Program Report (Tt, February 2010). Recommended modifications subsequent to Round 10 are summarized in the Executive Summary and Table 6-1 of the Rounds 1 through 10 Report. These excerpts from the Rounds 1 through 10 Report will be included in Appendix D of Revision 1 of the IOMP.

3. **Comment:** 11.1 Problem Definition, p. 32: Please indicate that "acceptable levels" refer to the offshore IRGs (except for lead).

**Response:** The text in Section 11.1 will be revised to reference project screening levels (PSLs) as the "acceptable levels." The following provides the proposed revisions:

"OU4 is currently in the FS stage of the CERCLA process, and a final remedy for OU4 has yet to be implemented. The remedy, which will be selected after completion of the FS, is scheduled to be in place by 2014. Per the Interim ROD (Navy, May 1999), *interim offshore monitoring will continue until a final remedy is selected for OU4* selection of a viable remedy requires continued monitoring in the offshore area of PNS. Environmental media will be monitored to determine whether over the course of interim monitoring current and future concentrations of chemicals of concern in the offshore areas identified herein are at acceptable levels ~~acceptable levels~~ (the project screening levels [PSLs])."

4. **Comment:** 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.

**Response:** The text will be revised to provide the requested clarification and a table with the stations for monitoring in biennial and every five years will be provided in Worksheet #17. The following is the proposed text revision for Section 11.2:

"As presented in *Table 6-1 of the Rounds 1 through 10 Interim Offshore Monitoring Report* (Tt, February 2010) samples will be collected from select monitoring stations on a biennial basis, and at all monitoring stations every five years *until a final remedy for OU4 is implemented in accordance with the Interim ROD for OU4 (Navy, May 1999)*. The biennial samples.....are not becoming a problem at these locations. *Worksheet #17 provides the list of stations for biennial and five year sampling.*

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

**Response:** The first sentence in Worksheet #17 will be clarified to indicate that the sampling strategy in Revision 1 of the IOMP Revision is for Rounds 11 and subsequent rounds (until a final remedy for OU4 is implemented) that is based on the Rounds 1 through 10 Report. Modifications made to the sampling program prior to Round 10 are summarized in Table 1-2 of the Rounds 1 through 10 Report and recommended modifications subsequent to Round 10 are provided in the Executive Summary and Table 6-1 of the Rounds 1 through 10 Report. The Executive Summary, Table 1-2, and Table 6-1 of the Rounds 1 through 10 Report will be included in Appendix D of Revision 1 of the IOMP. The proposed revision to the first sentence in Worksheet #17 is as follows:

The OU4 sampling strategy for *Rounds 11 and subsequent rounds* is the sampling design that was established in *Revision 0 of the Interim Offshore Monitoring Plan for OU4* (Tt, October 1999) that incorporates modifications recommended in the Rounds 1 through 10 Interim Offshore Monitoring Program Report (Tt, February 2010). *A summary of the modifications to the sampling program and recommended modifications based on the Rounds 1 through 10 Report are provided in Appendix D'*

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

**Response:** The Sediment Sampling SOP will be added to Appendix B.

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

**Response:** U.S.EPA Method 7471 (A or B) will be added to SAP Worksheet #19.

## **ATTACHMENT**

### **REVISED EXECUTIVE SUMMARY FOR REVISION 1 OF THE IOMP**

This Operable Unit (OU) 4 Interim Offshore Monitoring Plan (IOMP), Revision 1 provides the basis and method for conducting interim monitoring for OU4 at Portsmouth Naval Shipyard (PNS), Kittery, Maine, subsequent to Round 10 until a final remedy is implemented for OU4. This plan incorporates modifications to the program as recommended in the Rounds 1 through 10 Interim Offshore Monitoring Program Report (Tt, February 2010). Tetra Tech (Tt) prepared this OU4 IOMP for the United States Department of Navy, Naval Facilities Engineering Command (NAVFAC) Mid-Atlantic under the Comprehensive Long-Term Environmental Action Navy (CLEAN) Contract Number N62470-08-D-1001, Contract Task Order (CTO) WE29. This OU4 IOMP follows the format of the Uniform Federal Policy (UFP) for Quality Assurance Project Plans (QAPPs) (U.S. EPA, March 2005), and will be used during interim monitoring activities at OU4. OU4 is currently in the Feasibility Study (FS) stage of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process, and a final remedy has yet to be implemented. The remedy is scheduled to be in place by 2014.

OU4 includes areas offshore of PNS that potentially were impacted by PNS onshore Installation Restoration (IR) program sites. OU4 consists of Site 5, Former Industrial Waste Outfalls, and six offshore areas referred to as Areas of Concern (AOCs). Monitoring Stations (MS) were selected within OU4 to provide spatial coverage of the offshore AOCs.

The Navy, as lead agency, in consultation with U.S. EPA as a support agency, determined that interim monitoring was warranted for OU4. Per the Interim Record of Decision (ROD) (Navy, May 1999), the Navy is conducting monitoring in the offshore area of PNS until the FS is prepared and the final remedy has been implemented. Environmental media is being monitored to determine whether over the course of interim monitoring current and future concentrations of chemicals of concern in the offshore areas identified herein are at acceptable levels. In addition, interim monitoring is being used to meet the following objectives: (1) provide information on the current condition of the offshore areas; (2) provide information to support the identification and selection of any removal action, any additional interim action, or a final remedy; (3) be consistent with any final remedial action; and (4) provide a basis for any monitoring that may be incorporated as part of the final remedy.

Revision 0 of the IOMP (Tt, October 1999) was prepared as required by the Interim ROD to present the monitoring program for the interim action. Ten rounds of sampling have been conducted at OU4 from September 1999 to April 2010, as per the Revision 0 of the IOMP with modifications based on evaluation of the results of the monitoring. Modifications since initiation of the interim monitoring, including elimination of biota sampling, reduction of analytes, and reduction and changes in sampling locations, are summarized in Appendix D.

Modifications outlined in Revision 1 of the IOMP, to be implemented in Round 11, were made based on the evaluation of results from the 10 rounds of sampling and the recommendations in the Rounds 1 through 10 Interim Offshore Monitoring Program Report (Tt, February 2010). The recommendations in the Rounds 1 through 10 Report are also summarized in Appendix D