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NSY PORTSMOUTH
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LETTER AND U S NAVY RESPONSE TO MAINE DEPARTMENT OF ENVIRONMENTAL
PROTECTION COMMENTS REGARDING DRAFT REMEDIAL ACTION WORK PLAN,
INTERIM REMOVAL ACTION AT SITE 30 NSY PORTSMOUTH ME
06/22/2011
SHAW ENVIRONMENTAL AND INFRASTRUCTURE

June 22, 2011

Linda Cole – Code OPTE3-2
NAVFAC MidAtlantic
9742 Maryland Ave
Building Z-144, 1st Floor
Norfolk, VA 23511

**RE: DRAFT REMEDIAL ACTION WORK PLAN, INTERIM REMOVAL ACTION, SITE 30,
FORMER GALVANIZING TANK VAULT, PORTSMOUTH NAVAL SHIPYARD, KITTEERY
MAINE, APRIL 2011, CONTRACT N62470-08-D-1007, TASK ORDER WE16, SHAW PROJECT
137814, RESPONSE TO COMMENTS.**

Dear Ms. Cole:

The purpose of this correspondence is respond to the comments received from the Maine Department of Environmental Protection, dated June 3, 2011. Upon acceptance, all changes to the Remedial Action Work Plan (RAWP) Documents will be addressed and the RAWP will be issued as Final.

Thank you for providing Shaw Environmental & Infrastructure, Inc. with this opportunity. Should you have questions or comments please do not hesitate to call me at (401) 474-0867

Sincerely,
Shaw Environmental and Infrastructure, Inc



Fred Poulin
Project Manager

Enclosures (1)

wld/FP

cc.

Iver McLeod
Matthew Audet
Matt Thyng
Debora Cohen
William Deane
James Dunn
Project File

MEDEP
U.S. EPA
NAVFAC MIDLANT PWD-ME
Tetra Tech NUS Inc.
Shaw Environmental, Inc.
Shaw Environmental, Inc.
139281

Draft Remedial Action Work Plan
Interim Removal Action, Site 30, Former Galvanizing Tank Vault,
Portsmouth Naval Shipyard, Kittery, Maine

Response to Maine Department of Environmental Protection Comments

Dated June 3, 2011

1. **COMMENT:** Once the fixed laboratory is procured an updated work plan is needed, including revisions as appropriate to demonstrate that the lab can meet the project goals.

RESPONSE: Correct, at the time of submittal, Shaw had not selected their fixed base laboratory for analysis. Since the submittal, Shaw has selected Accutest Inc., Northeast location as their fixed based laboratory. This selection allows for consistency as Accutest was the approved lab for the Removal Action at OU-2 DRMO Impact Area and Site 34, and will also be the selected lab for the Remedial Action at OU-1. The updated lab information will be included in the Final QAPP.

2. **COMMENT:** Please add the Site 30 and Site 32 (OU7) monitoring wells to the Figure 2 Overview Map for reference.

RESPONSE: Figure 2 has been revised to show the Site 30 and Site 32 monitoring wells.

3. **COMMENT:** 3.8.1 Inspection, p. 3-4. The first and second paragraphs of this section say mostly the same thing. It appears that one should have been deleted.

RESPONSE: The text has been revised by deletion of the first paragraph.

4. **COMMENT:** SAP Worksheet #10, p. 28. Please provide statistics or some other means of demonstrating that only 3 concrete chip samples in a wall that is approximately 200 square feet in area will provide adequate confidence that no contamination will be left behind.

RESPONSE: Statistical evaluation is not applicable to determining the number of samples for sampling the concrete wall for this project. As provided in the SAP, the concrete chip samples will be visually biased samples (based on staining or other visual indicators of potential for residual fill material on the wall) that will be individually compared to the removal goals in the SAP for evaluation of potential residual material on the wall. The removal goals are based on risk-based numbers (USEPA RSLs) below which average site concentration (across the entire exposure unit) would not result in unacceptable risks for residential exposure. The Navy is comparing individual samples to these numbers to ensure that residual concentrations from Site 30 would not result in unacceptable residential risks for an exposure unit. The wall that will remain represents a very small portion of a residential exposure unit and the amount of fill/soil that could remain on the wall for exposure is also very small. The chip sample locations will be based on best professional judgment and the entire wall as well as the selected locations will be photographed for documentation. If more than three areas of staining exist, best professional judgment will be utilized to select the three areas which exhibit the greatest visual risk. It should be noted that the wall will be washed prior to any sampling.

5. **COMMENT:** SAP Worksheet #10, p. 29. Please add a definition for the acronym "RCI" to the List of Acronyms at the beginning of the document, or define it in the SAP Worksheet (WS) #10.

RESPONSE: Reactivity, Corrosivity, Ignitability (RCI) has been defined in the SAP Worksheet #10, p. 32.

6. **COMMENT:** SAP Worksheet #16, p. 43. Please correct the Deliverable Due Date for the Data Report as it occurs prior to initiation of the report.

RESPONSE: The Deliverable Due Date for the Data Report has been corrected with proper date of September 2011.

7. **COMMENT:** SAP Worksheet #20, p. 51. Please clarify that 1 duplicate per 10 samples (and 1/20 for blanks and MS/MSDS samples) means that 1 duplicate will be collected even if there are fewer than 10 (or 20) samples.

RESPONSE: Footnote 3 on Worksheet #20, p. 58 now reads, "Duplicate samples will be collected at a frequency of 1 per 10 field samples and are not required for waste characterization samples. One duplicate will be collected even if there is fewer than the prescribed number of samples."

Appendix D SAP/QAPP

8. **COMMENT:** App. D, Project-Specific SAP/QAPP, Worksheet 10: Please make the following changes to Worksheet 10:

- a. **COMMENT:** SAP WS #10, Table #1: Based on the objective of unrestricted use for the property, please add the MEDEP Remedial Action Goals for residential use where they are more conservative than the USEPA RSLs listed in the table. Based on a brief review the criteria cadmium, copper, lead, nickel, and selenium all have lower MEDEP soil criteria for residential use.

RESPONSE: Maine Remedial Action Guidelines (RAGs) are not ARARs and were not used as to-be-considered criteria. The removal goals are based on risk-based numbers (USEPA RSLs) below which residual concentrations across a residential exposure unit would not result in unacceptable residential risks. The Navy is comparing the individual samples to these goals to ensure that residual concentrations from Site 30 would not result in unacceptable residential risks across the exposure unit. The area represented by these samples is much smaller than the exposure unit. Based on this, the removal goals as presented in the SAP are low enough to ensure risks meet USEPA target risk levels and are acceptable for unrestricted use.

- b. **COMMENT:** SAP WS #10 - Groundwater and Figure 4 Building Sections: Depths to groundwater at the wells near Building 184 is approximately 5 to 6 feet below ground surface, only slightly deeper than the base of the vault. The plan should briefly address how such water will be dealt with if it is encountered.

RESPONSE: Excavation below the groundwater table is not anticipated. In the event groundwater is encountered, excavation may proceed, however the Navy and Stakeholders will be consulted to determine the final depths and/or sampling required after this condition as the medium to be sampled and the exposure pathway will have dramatically changed.

- c. **COMMENT:** SAP WS #10 - concrete wall sampling: Please briefly describe how the concrete will be sampled, or reference and provide an SOP.

RESPONSE: The concrete will be either chipped utilizing a chisel and hammer or a pneumatic (hammer) drill will be utilized to create a small penetration and the residual concrete from that penetration will be containerized and sent to the fixed based laboratory for analysis. The text will be revised to indicate as such.

- d. **COMMENT:** SAP WS #10 - Fill Material Soil Samples: Please provide the location or name of the source (quarry) used for the backfill material in the Completion Report.

RESPONSE: The Completion Report will include all weight tickets and source information for the backfill material imported to the site.