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NSY PORTSMOUTH
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LETTER AND COMMENTS FROM STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT SECOND FIVE-YEAR REVIEW REPORT NSY
PORTSMOUTH ME (PUBLIC DOCUMENT)

3/19/2012

STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

March 19, 2012

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

re: Draft Second Five-Year Review Report, Portsmouth Naval Shipyard, Kittery, ME, January 2012

Dear Linda,

1. 1.0. 1-3. Please provide a reference for the Site Management Plan.
2. 2.2, p. 2-3. In the History section indicate that there is also lead-contaminated soil outside the building.
3. 3.3, p. 3-9. Change "section" to "selection".
4. 3.3.1, p. 3-10. Please indicate that excavation in debris area is surface soil only.
5. 3.4, p. 3-13. The first five-year review report recommended that the wells be checked and repaired as needed as part of the additional investigation for OU2. The Status column of the table indicates that the wells will be inspected after the remedy is implemented. Were the wells inspected as part of the additional investigation for OU2 as the Navy recommended? Were they inspected at any other time? If not, why not?
6. Table 3-1, p. 2/5. Remove "are assumed" from the last sentence under Expected Outcome as there is no question that CoC concentrations will exceed cleanup levels for the foreseeable future.
7. 4.4, internal pipe outlet status, Section 4.7 and Section 4.8. The fact that the pipes are damaged in at least one place and the outlets could not be located indicates the cap may not be installed as designed. Inspection of this area should be included in the recommendations in Section 4.8 and Section 6.1. These observations are of particular concern if they are related to the potential slumping near the gas vents on the east side of the landfill.

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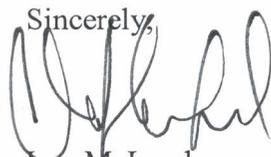
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8. 4.5.2.1, Monitoring Data Review, last paragraph and Table 4-5. The table is missing detections from the April 2011 sampling round, including 1,1 dichloroethylene, dichlorodifluoromethane, and vinyl chloride. Please add the data from JW-13B and these detections to the table. In addition 1,1 dichloroethane, 1,1 dichloroethylene, 1,1,2 trichlorotrifluoromethane and dichlorodifluoromethane need to be retained in the VOC analysis for the next 5-year sampling round. Total 1,2 dichloroethene may be dropped from the analytical list as the data show that the cis- isomer is the primary constituent in the total value. (This comment also applies to the Appendix D-1)
9. 4.5.3, p. 4-17. The text indicates that changes to action levels and screening levels are provided in Tables 4-2 and 4-4. Please add to these tables or provide new ones information indicating the actual changes – what were the original levels and what are the new levels.
10. 4.6, p. 4-18. "The covers also reduces infiltration of water..." Please change "water" to "precipitation/runoff" or something similar. The cover does not reduce infiltration of river water.
11. 4.6, p. 4-21. Opportunities for Optimization. See comment above regarding the VOC list.
12. 4.6, p. 4-22. Please indicate the numbers of the tilted gas vents and show their locations on a figure.
- 13.4.6, p. 4-23, fifth bullet. "There was only one change to a standard in an ARAR that affected an action level (PAHs and metals)." What was the ARAR and what was the change?
14. OU1 Site Inspection Checklist, Implementation of the Remedy, p. 4/4. Strike the reference to the Long Term Groundwater Monitoring Plan as there is no such plan for OU1.
15. App. B.2 Photographs. Please provide a photo of the constructed wetland from the other side of the trees so they do not block the view of the wetland.

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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