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LETTER AND CONCURRENCE FROM MAINE DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT FINAL REMEDIAL INVESTIGATION REPORT
OPERABLE UNIT 7 (OU7) NSY PORTSMOUTH ME
11/3/2011
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

Cohen, Deborah

From: McLeod, Iver J [Iver.J.McLeod@Maine.gov]
Sent: Thursday, November 03, 2011 5:02 PM
To: Cole, Linda L CIV NAVFAC MIDLANT, IPTNE
Cc: Wolfe, Theodore E; Evans, Chris; audet.matthew@epa.gov; Cohen, Deborah; Thyng, Frederick M CIV NAVFAC MIDLANT, PWD Maine; calepage@adelphia.net; Douglas.Grout@wildlife.nh.gov; lisa.joy@navy.mil; dbogen@metrocast.net; Mary Marshall; michele.dionne@maine.edu; Plbritz@ch.cityofportsmouth.com; Roger Wells; thegoobers@comcast.net
Subject: July 2011 OU7 Draft Final Remedial Investigation Report, Portsmouth Naval Shipyard

Linda,

The MEDEP has reviewed the DF RI Report for OU7 and has no further substantive comments. Therefore, the Navy should finalize this document.

However, while not significantly affecting the conclusions and recommendations of the RI report, MEDEP has some concerns regarding background comparisons and outliers in App. B. A significant issue with the original background study is simply due to it being rather dated. Analytical methods have improved a great deal and use of the old data is hampered by detection limit and non-detect issues, particularly with the PAH data.

On April 14 of this year MEDEP sent an email to the Navy requesting an addendum for the May 2000 Facility Background Development document. The addendum would discuss why the May 2000 benchmarks were replaced by numbers based on 2002 EPA guidance, show calculations, etc. We would like to continue this discussion along with other issues related to background comparisons. This would be separate from any specific OU or site. While another background study likely is not necessary we need to discuss how best we can use the data we already have. I will follow up on this with you later.

Let me know if you have any questions.

Thanks,

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