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NSY PORTSMOUTH
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LETTER AND COMMENTS FROM UNITED STATES FISH AND WILDLIFE SERVICE
REGARDING DRAFT PROPOSED PLAN OPERABLE UNIT 4 (OU4) NSY PORTSMOUTH ME
10/25/2012
UNITED STATES FISH AND WILDLIFE SERVICE

-----Original Message-----

From: Kenneth_Munney@fws.gov [mailto:Kenneth_Munney@fws.gov]

Sent: Thursday, October 25, 2012 22:44

To: Middleton, Elizabeth B CIV NAVFAC MIDLANT, EV

Cc: 'Matthew Audet' (Audet.Matthew@epamail.epa.gov); ken.finkelstein@noaa.gov; 'McLeod, Iver J' (Iver.J.McLeod@Maine.gov)

Subject: Re: PORTSMOUTH NAVAL SHIPYARD INSTALLATION RESTORATION PROGRAM - Draft Proposed Plan for Operable Unit 4

Thank you for the opportunity to provide brief technical comments on the PNS Proposed Plan for OU4. As noted by NOAA, the Navy proposes to remediate the sites that have been of highest ecological concern for many years and are most in need of cleanup. Comprehensive removal and off-yard disposal of contaminated sediment will achieve the most protective remedy possible. As stated, contaminated sediment will be delineated prior to removal. However, there is no mention of post-excavation confirmational sampling to verify complete removal of contamination. Since the Navy is proposing not to include LUCs, O&M, LTM or Five Year Reviews for all sites, it would be most conservative to verify full attainment of site-specific RGs at depth. We are assuming that post-excavation elevations will be retained without thin-layer capping but it would be beneficial to clarify this for each alternative. Additionally, site-specific RGs are not discussed in the PP and would provide a more comprehensive portrayal of remedial benefits for each area.

We are interested in pre-removal sampling design and results, remedial design and post-excavation confirmational results, as these issues evolve.

Please contact me if you have any questions or concerns.

Best regards,

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