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NSY PORTSMOUTH
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LETTER AND COMMENTS FROM STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT FEASIBILITY STUDY REPORT OPERABLE UNIT 9
(OU9) OCTOBER 2012 NSY PORTSMOUTH ME
1/14/2013
STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
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January 14, 2013

Elizabeth Middleton
NAVFAC MIDLANT
Code OPTE3
9742 Maryland Ave
Norfolk, VA 23511

re: Draft Feasibility Report for OU9, Oct. 2012, Portsmouth Naval Shipyard, Kittery, ME

Dear Liz,

The Maine Department of Environmental Protection has reviewed the Draft FS for OU9. We have the following comments.

1. Add PEF to the acronym list.
2. 1.6.2. p. 1-10, last full sentence. "...contamination at OU9 is due to PAHs..."
Contamination at OU9 is due to past activities at the site. Risk at OU9 is due to PAHs. Please revise this statement.
3. 1.6.2. p. 1-10. Indicate the source of the risk-based screening levels and include a table showing the screening levels used in the report.
4. 1.6.3. p. 1-11, 2nd paragraph. "...because most of the site contamination was removed, offsite migration of remaining contamination in the subsurface is not expected." Removal of most of the contamination has no bearing on the migration of remaining contamination. Migration of the subsurface soil could occur if it were brought to the surface or if shoreline controls failed. It would be more accurate to say something like, "...because most of the site contamination was removed, any risk resulting from offsite migration of remaining contamination in the subsurface is expected to be insignificant."
5. 3.3.3, p. 3-9. Please indicate the depth of the water line.
6. Table A.1, Footnote 2. This is the only time in the document the term "Regional Screening Level" is used. Please state the source of the regional screening levels and include it in the references if appropriate.
7. 4.2.2. Alternative 2. p. 4-7. The description of this alternative states that LUCs would prevent residential land use of the PAH-contaminated area north of Building 62. Applying a

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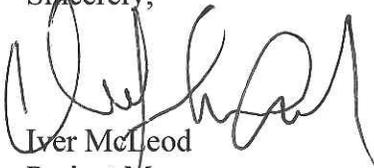
LUC to this very small area in the midst of land where residential use would be allowed would be confusing at best. It would be much simpler to apply LUCs preventing residential use to the entire property.

In addition, this would satisfy MEDEP's preference to limit residential exposure to surface and subsurface soil contaminants posing a risk with an Incremental Lifetime Cancer Risk (ILCR) level to less than 1×10^{-5} . As stated previously, MEDEP's ILCR benchmark is not promulgated and therefore we cannot require the Navy to meet it. However, we have a strong preference for remedial alternatives that meet this benchmark.

8. App. C, Cost Estimates. Alternative 4 should include a line for "Site Health & Safety and QA/QC" as is shown for Alternative 3, line 3.6.

Please feel free to contact me at (207) 287-8010 if you have any questions.

Sincerely,



Iver McLeod
Project Manager
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