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NSY PORTSMOUTH
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LETTER AND COMMENTS FROM MAINE DEPARTMENT OF ENVIRONMENTAL
PROTECTION ON DRAFT FINAL FEASIBILITY STUDY REPORT OPERABLE UNIT 7 (OU7)
SITE 32 NSY PORTSMOUTH ME
4/29/2013
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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April 29, 2013

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

re: Draft Final Feasibility Study Report for OU7, Portsmouth Naval Shipyard, Kittery, Maine,
February 2013.

Dear Liz,

The Maine Department of Environmental Protection has reviewed the subject document and has the following comments.

1. As discussed in recent emails and phone calls, the Navy should calculate the non-carcinogenic risk from PCBs at the site, as an addendum to the OU7 risk assessment. Since there is no reference dose for Aroclor 1260, the most common at OU7, the Navy calculated the total PCBs PRG based on carcinogenic numbers. However, non-carcinogenic risk for PCBs is greater than carcinogenic risk in some risk scenarios. Except for the Commercial scenario the non-cancer risk is a significant risk driver for PCBs.

As previously discussed, because there is no reference dose for Aroclor 1260 the Navy should use the reference dose for Aroclor 1254 as a surrogate. The use of a surrogate will lead to uncertainty and this should be discussed in the addendum. In addition to the addendum, the FS should indicate what the PRG would be based on non-carcinogenic PCBs.

Because of the hot-spot nature of PCB-contaminated soil at the site, excavation to or below the carcinogenic PRG will also result in excavation of soil to the non-carcinogenic PCB. For this reason, and at Site 32 only, the MEDEP is willing to base remediation of PCB-contaminated soil on the carcinogenic PRG.

Should this issue arise at any other Installation Restoration sites at the Portsmouth Naval Shipyard we will have to discuss how to proceed at that time. However, based on our knowledge of the other IR sites on the yard we don't expect this to be a future issue.

2. RTC 3. "Use of a construction worker exposure frequency of 60 days per year is based on likely construction worker exposure at OU7 and is consistent with construction worker PRG development in the OU1 and OU2 FS reports."

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Construction worker exposure duration at one OU or site should not necessarily be assumed to be the same duration at another OU or site. Exposure duration largely depends on the types of construction work performed at any one site and this of course can vary between sites. In this situation, MEDEP agrees that 60 days is appropriate.

3. RTC 9. If a typical excavation depth could result in unacceptable exposure for a construction worker then the contaminated soil should be removed regardless of whether or not the soil is saturated. This does not mean we expect the Navy to excavate to a depth of 9 feet but rather to a depth typical for excavations at the Shipyard. We note that the Navy took into account removing soil to a depth of 9 feet bgs in the quantity calculation (App. D) and cost estimate for Alternative 3 (App. C.2).

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

Sincerely,



Iver McLeod
Project Manager
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