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NSY PORTSMOUTH
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LETTER REGARDING MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT NO FURTHER ACTION DECISION DOCUMENT FOR SITE 30 NSY
PORTSMOUTH ME
7/3/2013
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

July 3, 2013

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

re: Draft No Further Action Decision Document for Site 30, Portsmouth Naval Shipyard, Kittery, ME, May 2013.

Dear Liz,

The Maine Department of Environmental Protection (MEDEP) has completed its review of the subject document and we have the following comments.

1. According to App. K in the Draft Site 30 Construction Completion Report crystals collected from the southeast corner of the office and from the west wall of Building 184 had an expected pH of 7-12. However, crystals collected from along the edge of the former tank vault (Pillar 3) had a pH of 2.02 – 2.15. These results seem to support the earlier conclusion that the tank vault was the source of the low pH crystals.

Please provide an explanation for the low pH of crystal samples collected from the tank vault area. Given that efflorescence typically has a pH of 7 or higher, as seen in the other two sample locations, an acidic pH is unexpected. Since the tank vault contained acid it is important for the Navy to demonstrate that the low pH crystals are not related to the vault by providing an alternate explanation.

2. The NFA document (and the EE/CA from 2010) reference a “PNS Construction Worker Risk-Based Number for Groundwater”. Please add a reference where this value was developed and approved.

3. Figures 4 and 5. Please provide a reference for the source document on these figures.

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

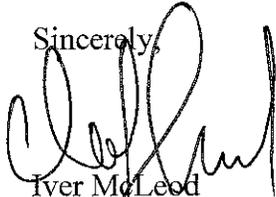
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Sincerely,



Iver McLeod

Project Manager

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