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NSY PORTSMOUTH
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LETTER REGARDING MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN FOR PRE-REMOVAL SEDIMENT
CONFIRMATION SAMPLING AT OPERABLE UNIT 4 (OU 4) NSY PORTSMOUTH ME

7/9/2013

MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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July 9, 2013

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re: Draft Sampling and Analysis Plan for Pre-Removal Sediment Confirmation Sampling at
OU4, Portsmouth Naval Shipyard, Kittery, Maine, June 2013.

Liz,

The Maine Department of Environmental Protection has reviewed the subject document. Our
comments follow.

1. The MEDEP will likely attend some of the pre-confirmation sampling. Please ensure we receive a work schedule at least two weeks prior to mobilization. MEDEP should also receive a copy of the final Accident Prevention Plan to acquaint ourselves with safety procedures for this project. We will also attend any necessary safety meetings held on the day of sampling.
2. Section 2, Communication Pathways. Please include communication with regulators per EPA's UFP-QAPP section 2.4.2.
3. Section 7, re: freezing samples. The referenced EPA document states, "a holding time of 100 days at either 4° C or -20° C would result in no more than a 20% decrease in concentration." Therefore, if frozen samples are analyzed it will be necessary to pay special attention to any results of low molecular weight PAHs that are slightly below PRGs. It is possible that such results could be biased low.
4. 8.1.2. Please provide a copy of the APP to the MEDEP. See Comment 1.
5. 8.1.3. Geotechnical Engineering Parameters Sampling. "Each sample will consist of a single depth interval at one location." Will the Navy collect more than one sample if there are significantly different sediment types at different intervals in the same core?
6. 8.2.2. Data Management. Electronic data must also be submitted to the MEDEP in the required MEDEP EDD format.

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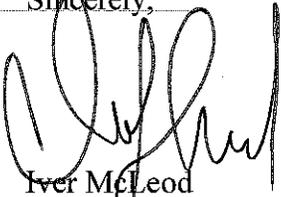
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7. 8.4 Sample Details Table. Some Rationale/Comments entries state, "...subsurface assumed to be < PRG" and some say, "Need to bound subsurface horizontally and vertically." However, for many of these entries the top two layers will be analyzed and the lower ones will be held. If some of the subsurface locations are assumed to be less than the PRG then why will subsurface samples be collected? Further, what are these assumptions based on?

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

Sincerely,



Iver McLeod
Project Manager
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