

N00102.AR.002913
NSY PORTSMOUTH
5090.3a

LETTER REGARDING U S EPA REGION I COMMENTS ON DRAFT RECORD OF DECISION
FOR OPERABLE UNIT 7 (OU 7) NSY PORTSMOUTH ME
8/27/2013
U S EPA REGION I



Deborah

To: Audet, Matthew <Audet.Matthew@epa.gov>
Cc: Tuesday, August 27, 2013 2:46 PM
Liz Middleton; Bryan Peed; Iver McLeod; Cohen, Deborah; Paul Dombrowski
Subject: Johnson, Winoma A CIV NAVFAC MIDLANT, IPTNE
EPA Comments OU7 ROD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

August 27, 2013

Liz Middleton, EIT
Remedial Project Manager
Northeast IPT, NAVFAC Mid Atlantic
Code OPTE3
9742 Maryland Ave
Norfolk, VA 23511

Re: EPA comments on Navy's July 24, 2013 Draft Record of Decision for Operable Unit 7, Portsmouth Naval Shipyard, Kittery, Maine

Dear Ms. Middleton:

I have reviewed the subject documents provided by the Navy. The Agency's comments are provided below:

- 1.) Section 2.1: Change the last sentence from "The Navy is the lead agency for CERCLA activities at the facility, and USEPA and MEDEP are support agencies." to "The Navy is the lead agency for CERCLA activities at the facility, and USEPA and MEDEP provide regulatory oversight."
- 2.) Table 2-1: In the 2nd investigation (Groundwater Monitoring), change the 2nd sentence under "Activities" from "The purposed of the program..." to "The purpose of the program..."
- 3.) Section 2.12.1: In the first bullet change the sentence "Excavation under Alternative 3 will result in unrestricted exposure for current industrial workers and unrestricted exposure to surface soil at OU7." to "Excavation under Alternative 3 will result in unrestricted exposure for current industrial workers and unrestricted exposure to current and future industrial workers to surface soil at OU7." Alternatively, confirm that excavation under Alternative 3 will result in "unrestricted exposure" for hypothetical residents.
- 4.) Table 2-3: Please explain in footnote 1 the meaning of "pick-up levels". To ensure that the high PCBs cleanup level (7.3 mg/kg) for residents is not precedential, please add a footnote indicating this cleanup level is based only on carcinogenic risk, that a non-carcinogenic residential cleanup level would be lower, and that this cleanup level was negotiated based on the likelihood that the post-excavation

exposure point concentration will have acceptable residential carcinogenic and non-carcinogenic risk, to be confirmed by post-excavation confirmation sampling.

- 5.) Section 2.12.2: In the 1st bullet it is stated that prohibited residential uses shall include “any form of housing”; however, in the next to last paragraph in Section 2.1 it is stated that current activities include a hotel (Bldg. H23). Perhaps, the language should be changed to indicate that prohibited residential uses shall include any form of housing, other than transient officers’ housing. Alternatively, explain what this transient housing entails in terms of exposures.

If you have any questions, please feel free to contact me at audet.matthew@epa.gov or 617.918.1449.

Sincerely,

A handwritten signature in cursive script that reads "Matthew R. Audet".

Matthew R. Audet, P.G.
Remedial Project Manager
Office of Site Remediation and Restoration