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TRANSMITTAL LETTER FOR THE DRAFT FINAL NO FURTHER ACTION DECISION
DOCUMENT FOR SITE 30 AND U S NAVY RESPONSES TO MAINE DEPARTMENT OF
ENVIRONMENTAL PROTECTION COMMENTS NSY PORTSMOUTH ME

12/23/2013
TETRA TECH



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PITT-12-13-044

December 23, 2013

Project Number 112G02100

Mr. Matthew Audet
USEPA, Region 1
5 Post Office Square
Suite 100
Mail Code OSRR07-3
Boston, Massachusetts 02109-3912

Mr. Iver McLeod
Maine Department of Environmental Protection
State House Station 17
Augusta, Maine 04333-0017

Reference: Contract No. N62470-08-D-1001 (CLEAN)
Contract Task Order No. WE13

Subject: Draft Final No Further Action Decision Document for Site 30 and
Responses to Comments on Draft
Portsmouth Naval Shipyard (PNS), Kittery, Maine

Dear Mr. Audet/Mr. McLeod:

On behalf of the U.S. Navy, Tetra Tech is pleased to provide to U.S. Environmental Protection Agency Region I (USEPA) and Maine Department of Environmental Protection (MEDEP) 2 and 3 copies, respectively, of the subject document. The Navy's responses to MEDEP comments dated July 3, 2013 on the draft document are also enclosed. USEPA indicated in an e-mail dated July 25, 2013 that they had no comments on the draft document. Electronic copies of the document and responses to comments will be provided via e-mail.

A public comment period on the subject document is scheduled to begin on January 7, 2014. A notice of availability will be placed in two local newspapers at the beginning of the public comment period.

If you have any comments or questions, or if additional information is required, please contact Ms. Elizabeth Middleton at 757.341.1985.

For the Community Restoration Advisory Board (RAB) members; if you have any comments or questions on these issues, they can be provided to the Navy at a RAB meeting, by calling the Public Affairs office at 207.438.1140 or by writing to:

Portsmouth Naval Shipyard
Public Affairs Office
Attn: Danna Eddy
Portsmouth, NH 03804-5000

Sincerely,

Deborah J. Cohen, PE
Project Manager

DJC/clm
Enclosure

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Mr. Matthew Audet
Environmental Protection Agency
Mr. Iver McLeod
Maine Department of Environmental Protection
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Without Enclosure

Mr. Doug Bogen (e-mail)
Ms. Mary Marshall (e-mail)
Mr. Peter Britz (e-mail)
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Hard Copy and e-mail enclosures

NAVFAC MIDLANT. (Code OPTE3/E. Middleton)
NAVFAC MIDLANT PWD ME (Code PRN4, M. Thyng)
NIRIS RDM (responses to comments only)

**RESPONSES TO MEDEP COMMENTS DATED JULY 3, 2013
DRAFT NO FURTHER ACTION DECISION DOCUMENT FOR SITE 30
PORTSMOUTH NAVAL SHIPYARD, KITTERY, MAINE**

1. **Comment:** 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.

Response: The low pH of the crystals are not likely the result of acid being present that is being wicked into the pillar (piling 3), but rather from the type of metals that are in the salt deposits forming on the masonry surface. Any acid that may have spilled from use of the tank vault, which has been closed since the 1960s, would have been neutralized. The type of metals in the salt deposits could be from a combination of metals in the soil around the wall, in the water/moisture coming into contact with the wall causing the efflorescence, and in the wall material. A fingerprinting type investigation of all of these materials may be able to distinguish the different sources of the metals in the crystals; however, this would be difficult and time consuming. The Navy does not believe that such an investigation is warranted given that the potential contaminant source from Site 30 has been removed and the crystals do not pose a CERCLA risk.

2. **Comment:** 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.

Response: The reference of “PNS Construction Worker Risk-Based Number for Groundwater” in the NFA DD is included in Appendix A.1 (Tables and Excerpts from Previous Documents) in the excerpt that was taken from the October 2010 EE/CA (specifically Table 3 in Appendix B of the EE/CA). The methodology for calculation of a PNS Construction Worker Risk-Based Number for Groundwater has been presented in several documents for PNS, including in Appendix D. 2 of the Remedial Investigation Report for OU1 (Tetra Tech, July 2007) and in Appendix D.5.3 of the Remedial Investigation Report for OU7 (Tetra Tech, July 2011). Appendix D.5.6 of the Remedial Investigation Report for OU7 provides the most recent list of screening levels calculated using this methodology. A note will be added to the bottom of Table 3 to refer to Appendix D of the Remedial Investigation Report for OU7 for the methodology.

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

Response: Figure 4 was developed from information on several PNS drawings as listed in the note on the figure, and most recently was provided as Figure 2-3 in the October 2010 EE/CA and Figure 3 in the December 2010 Action Memorandum. Figure 5 was developed after conducting the 2001 test pitting investigation and was most recently presented as Figure 2-4 in the October 2010 EE/CA and Figure 4 in the December 2010 Action Memorandum. An

additional note will be added to Figures 4 and 5 in the NFA DD to reference Figures 3 and 4, respectively, in the December 2010 Action Memorandum.