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NSY PORTSMOUTH
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LETTER AND MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS
REGARDING DRAFT SAMPLING AND ANALYSIS PLAN OPERABLE UNIT 8 (OU 8)
REMEDIAL INVESTIGATION NSY PORTSMOUTH ME
06/11/2014
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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June 11, 2014

Linda Cole
NAVFAC MIDLANT (Code OPTE3)
Environmental Restoration
Building Z-144, Room 109
9742 Maryland Ave
Norfolk, VA 23511-3095

re: Draft Sampling and Analysis Plan for Operable Unit 8 Remedial Investigation, Portsmouth Naval Shipyard, Kittery Maine, April 2014.

Dear Linda,

The Maine Department of Environmental Protection has completed its review of the subject document. We have the following comments.

General Comment

1. Although the general boundary of the site is described by the quay wall, it is evident from the data at MW/SB-05 and potentially from the disposal data from the recent utility work at Building 174 that the fill placed west of the quay wall is also impacted. It is unclear whether impacts are from Shipyard activity after the filling occurred or from the fill itself. If access can be established additional borings are warranted to characterize soils west of the quay wall. Disposal data from the utility excavation needs to be added to the SAP as an appendix and evaluated to determine if it is consistent with the CSM and the likely COCs. If this data indicate that there are data gaps in the CSM then adjustments need to be made to the SAP.

Specific Comments

- 2. Executive Summary, 1st and 2nd sentence. These sentences give the impression that the RI has already been started. Please change the words completing/complete to performing/perform.
- 3. 10.3, History of Environmental Investigations: The former fuel tanks in the area near Building 92 are identified as potential sources in Section 10.4.3. TPH was detected in soil and groundwater and was identified in the SI as needing additional data collection. In addition to the PAHs please add MADEP EPH method for evaluation of the TPH previously detected at the site.
- 4. 10.3, p. 20, 3rd para. Change "...concentrations exceeding industrial risk-based screening..." to ~~"...concentrations exceeding USEPA industrial risk-based screening..."~~ since Table 1 does

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not indicate that the Navy made any comparison to Maine Remedial Action Guidelines for Soil (RAGS).

5. 10.4.4, p. 23. The previous data collection suggests some tidal influence on groundwater at the site, but it does not necessarily mean there is an influx of river water to the site each tidal cycle. The groundwater data do indicate that in-situ the soils are not leaching significant concentrations of contaminants under current conditions. However, the TCLP data from the utility project may show that management of any future excavated soil will be needed for disposal.

6. 10.4.4, p. 24, 2nd para. The impacts to the offshore are also contingent on conditions such as buildings and asphalt remaining in place. The concentrations won't increase but the mobility could increase if soil were exposed, excavated etc. Text should be added to note that factor.

7. Section 11.2, Project Action Limits and Section 11.4, Decision Rule #3: Maine DEP considers acceptable risk to meet an Incremental Lifetime Cancer Risk (ICLR) of 10⁻⁵ for carcinogens for purposes of human health risk assessment, please revise as needed.

8. Section 11.3, Study Area Boundaries and Figure 8: As noted above, soil data indicate that the boundary of contamination to the west is not defined. It is unclear if Site 31 is the source of elevated concentrations. Additional data are needed to quantify concentrations in the fill, if access is possible, unless data are available for the geotechnical borings around Building 174. At a minimum the area needs to be qualitatively discussed since it borders the currently identified site boundary.

9. Section 11.4, Groundwater EPCs: Approval of the groundwater EPCs will be determined when the Navy risk assessor proposes criteria.

10. Section 11.4, Decision Rule #1: MEDEP does not typically allow compounds to be screened out of a risk assessment based on background concentrations. At a minimum, the implication of leaving out such compounds must be discussed in the uncertainty section of the risk assessment. For comparisons of risk-based values to background MEDEP suggests that the 95% UCL statistic would be an appropriate background value to consider. If another value is used please provide a rationale.

11. Worksheet #13: Please provide the boring logs referenced from construction at Building 92 and Building 174 as an electronic appendix to the SAP.

12. Worksheet #15: Several PAHs do not have brackish/saline PSLs available. What screening levels will be used for these compounds in the likely scenario that the water is brackish/saline?

13. Worksheet #15 and Worksheet #17:

- Please add EPH to the groundwater and soil collection and add the MEDEP reference limits to Worksheet 15. Rather than sample all soil locations for EPH a subset of samples are warranted for locations where there is field evidence of petroleum impacts in the soil. As a minimum locations adjacent SB-02, SB-05, or SB-06 may warrant sampling, based on the earlier data.

- Groundwater, hydraulic conductivity – The general approach is acceptable, although there appear to be some errors in the text. (MW-05 is *west* of the site, and MW-03 is in the east central portion of the site) Based on the proximity or inclusion of MW-02 and MW-05 in the backfill material from the recent construction at the site, only one of these wells is warranted for the study, to see if the newer fill has a hydraulic conductivity distinct from the historic fill in the area. MW-06 should also be considered, based on its location near the last timber basin area filled, and to provide spatial coverage from other wells proposed.

14. Worksheet 18 and Figure 8: Soil samples also are needed from SB-07, to support the groundwater data, and to provide additional soil characterization west of the quay wall. Please add to the table and revise as needed. A subset of EPH samples is also needed as an addition to the table. If trailers or other items have been moved following completion of the work at Building 174 then the three “middle” borings to the south and roughly in line with WTB-MW-04 should be shifted west to the other side of the rail or crane lines for greater spatial coverage of the site.

15. Appendix A: The table associated with the sensitivity analysis indicates that a more desirable 10% alpha error can be achieved with only a small increase in the number of samples, 23 vs 18. The previous page notes that MARSSIM recommends that the number of samples be increased by 20% to account for uncertainty and potential missing/unusable samples, but in this case no increase was included. Based on these factors adding soils data from MW/SB-07 and perhaps adding an additional boring west of the quay wall is consistent with the approach taken to evaluate the number of samples needed. These locations would also provide adequate data collection if some of the proposed sample point(s) prove to be inaccessible.

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

Sincerely



Iver McLeod
Project Manager

Bureau of Remediation and Waste Management

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