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NSY PORTSMOUTH
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LETTER AND THE MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS
ON THE DRAFT TECHNICAL MEMORANDUM PERFLUORINATED COMPOUND USE
ASSESSMENT NSY PORTSMOUTH ME
12/15/2014
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

December 15, 2014

ATTN: L.L. Cole, BLDG Z-144, 1st FLOOR
COMMANDING OFFICER
NAVFAC MIDLANT
9324 VIRGINIA AVE
NORFOLK, VA 23511-3095

re: Draft Technical Memorandum, Perfluorinated Compound Use Assessment, Portsmouth Naval Shipyard, Kittery, Maine, August 2014.

Dear Linda,

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

1. Due to the likely presence of PFCs in the landfill, MEDEP agrees with USEPA's December 15, 2014 email indicating the Navy should collect groundwater samples from the landfill and perform PFC analysis on them.
2. 2.0, Potential Sources-Fire Fighting and Fire Suppression. Other Dept. of Defense facilities which MEDEP regulates were required to flush and test mobile and fixed equipment multiple times during the year, which involved some discharge of the AFFF mixture, frequently to the ground surface. Please confirm if this sort of maintenance or testing was conducted for the PNSY AFFF equipment.
3. 2.0, Potential Sources-Electroplating. Based on the drain plan MEDEP has on record there is a large line originating from Building 79 flowing to the north through the west side of Site 32. If this line was in use historically then waste discharged during plating operations may have been released to the river north of Site 32, as well as to the Berth 6 area. This potential pathway should be included in the summary unless building plans confirm that all the waste drained to the south. If it is possible there were discharges to Outfall 60 (or another in that vicinity) then the sediment could be tested and compared to the screening criteria developed by MECDC for recreational exposure to sediment.
4. 3.0, Conclusions. "Therefore the PFOA MEG is not applicable to groundwater at PNSY because potable water is provided from outside PNSY, the groundwater is not used for drinking, and institutional controls are in place to prevent future groundwater use for the JILF."

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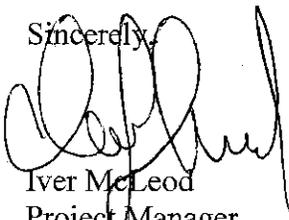
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- a) The PFOA MEG is in fact applicable to fresh groundwater at PNSY (assuming PFOAs are present, of course). However, because the groundwater is not used for drinking no action need be taken if there are exceedances of the MEG (however, we note that, other than at the JILF, we know of no actual prohibition of fresh groundwater consumption at the shipyard).
- b) The last part of this sentence is incorrect - ICs for the JILF do not prevent all future groundwater use, only the use of groundwater as a potable water source.

5. In numerous instances in the memo Portsmouth Naval Shipyard is abbreviated as PSNY. These should be corrected to PNSY.

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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