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NSY PORTSMOUTH
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LETTER AND THE MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION RESPONSE
TO COMMENTS REGARDING THE OPERABLE UNIT 7 (OU 7) DRAFT REMEDIAL ACTION
WORK PLAN NSY PORTSMOUTH ME
02/19/2015
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
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February 19, 2015

ATTN: L.L. Cole, BLDG Z-144, 1st FLOOR
COMMANDING OFFICER
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re: Navy responses to MEDEP comments, OU7 Draft Remedial Action Work Plan, Portsmouth NSY, Kittery, ME, emailed Jan. 5, 2015.

Dear Linda,

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

1. Response to Comment 16.

- a. Please explain Navy's reluctance to excavate saturated soil. If the soil could present an unacceptable risk to construction workers – and the HHRA indicates that it could – then it should either be removed or the possibility of exposure removed using land use controls. Such a LUC would need to require sampling of subtidal soil prior to any post-remedy excavation to ensure that construction workers would not be exposed to contaminated soil potentially presenting an unacceptable risk.
- b. "...the difference between high and low tide is probably relatively small." According to the July 2011 RI Report for OU7, Table 3-1, the difference between high and low tide in TP-MW02 on December 15, 2008 was less than a foot. However, the difference between high and low tide on Dec. 16, 2008 was 3.89 feet, a relatively large difference. If the fill below the high tide level is contaminated it may pose an unacceptable risk to construction workers.

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

Sincerely,

Iver McLeod
Project Manager

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