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LETTER AND THE U S EPA REGION I COMMENTS ON THE DRAFT REMEDIAL  
INVESTIGATION/FEASIBILITY STUDY REPORT FOR OPERABLE UNIT 8 (OU 8) AT NSY  
PORTMOUTH ME  
06/07/2016  
U S EPA REGION I BOSTON MA



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

June 7, 2016

Linda Cole  
Remedial Project Manager  
Northeast IPT, NAVFAC Mid Atlantic  
Code OPTE3  
9742 Maryland Ave  
Norfolk, VA 23511

Re: ***Draft RI/FS Report, OU8 , Portsmouth Naval Shipyard, Kittery, Maine***

Dear Ms. Cole:

I have reviewed the subject document submitted by the Navy. The Agency's comments are provided in Attachment 1.

If you have any questions, please feel free to contact me at [audet.matthew@epa.gov](mailto:audet.matthew@epa.gov) or 617.918.1449.

Sincerely,

A handwritten signature in blue ink that reads "Matthew R. Audet." is positioned below the word "Sincerely,".

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

cc. Iver McLeod/ME DEP  
Deb Cohen/Tetra Tech NUS  
Paul Dombrowski/Resolution Cons.

## Attachment 1

### **EPA comments on Navy's *Draft RI/FS*, OU8, Portsmouth Naval Shipyard, Kittery, Maine**

1. Section 6.1, page 6-5: the next-to-last bullet indicates that the June 2015 Regional Screening Level table was used. Since this is a draft, EPA expects the final risk assessment to use the latest version which is May, 2016. Please review the "What's New?" section of the RSL website for versions back to June 2015 to identify any of the Site COPCs that may have changed. If, as I suspect, none have changed, please note this in the final version somewhere in the text or as a footnote to the COPC selection tables, or preferably change the citation (i.e. USEPA, June 2015a) to USEPA, May, 2016. If any have changed, please update the COPC selection and risk assessment results, as appropriate.
2. Section 6.5.4, page 6-21: In the subsection entitled "Non-carcinogenic Risks-CTE Evaluation" change the first sentence from "...under the CTE scenario are less than 1 that no adverse..." to "...under the CTE scenario are less than 1, indicating that no adverse..."
3. Section 6.5.4, page 6-22: In the subsection entitled "Non-carcinogenic Risks-CTE Evaluation" change the 4<sup>th</sup> sentence from "The associated target organ (thyroid) exceeds 1." to "The associated target organ (thyroid) HI exceeds 1."
4. Section 6.6.1, page 6-27: In the subsection entitled "Chemicals Eliminated Due to Background" prior to the in-text table, it is stated that the cumulative site risks were calculated and are presented in Appendix D.8.1, which could not be found on the CD. Please provide this in the final and send a copy as soon as possible for EPA review.
5. Section 6.6.2, page 6-31: Please add a footnote explaining "NA" in the unnumbered table on this page.
6. Figure 6-1: This figure indicates an incomplete pathway for subsurface soil direct contact for occupational worker, recreational user, and future resident; however subsurface soil PRGs are developed for recreational user, industrial worker, and resident in Appendix D. Please clarify in the text. Although changes in land use are unlikely, institutional controls should be instituted to prevent exposure of these receptors to subsurface soils if it cannot be demonstrated that the subsurface soil PRGs are met.
7. Section 7.4, page 7-4: The sentence prior to in-text Table 7-4 indicates that ARAR-based PRGs were used for lead; however, subsurface PRGs are developed for the subsurface soil lead PRGs for industrial workers and recreational users in the table are based on blood lead modeling, which is risk based, rather than ARAR-based. Please clarify.