



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NSY PORTSMOUTH  
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ANGUS S. KING, JR.  
GOVERNOR

MARTHA KIRKPATRICK  
COMMISSIONER

September 13, 2002

Mr. Fred Evans  
Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mailstop 82  
Lester, PA 19113-2090

Re: Navy Response to Comments, Draft Site 32 Quality Assurance Project Plan,  
Portsmouth Naval Shipyard, Kittery, ME, April 2002.

Dear Fred:

The Maine Department of Environmental Protection has reviewed the document  
referenced above. The Department's additional comments follow.

**General Comment**

1. We note that the Navy is in the process of providing additional material as responses to MEDEP Comments 2 and 10.

**Specific Comments**

2. MEDEP Comment 5

Navy Response: "The soil and groundwater outside the former acid pit have not shown elevated levels of metals, which would indicate that the acid pit contaminants have migrated in the environment. The Navy disagrees that the 'shallow soil' at Site 30 (presumably the 0 to 1 foot bgs samples) has elevated levels of the same metals as those in the Site 32 downgradient groundwater."

Reports released by the Navy on Sites 30 and 32 provide data that do indicate the metals of concern in Site 32 groundwater (copper, nickel, lead, and zinc [see page 1-16 of the RI QAPP]) are also present as exceedances in Site 30 soils. The use of "shallow soil" in the MEDEP comment was not limited to surface soil, although a nickel exceedance in the 0- to 1-foot soil sample at B184-MW03 was documented. The other exceedances of nickel were in deeper soils and occurred at both B184-MW-01 and B184-MW-02. Also, copper and lead were found at 116J mg/kg and 394J mg/kg in the 3 to 5 foot depth interval at B184-MW-02. This boring/well is located just outside Building 184 where the former acid pit resides. The MEDEP will continue to push for the case that the available data

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688  
RAY BLDG., HOSPITAL ST.

BANGOR  
106 HOGAN ROAD  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769-2094  
(207) 764-0477 FAX: (207) 764-1507

suggest there is a potential for metal migration from Site 30 to Site 32 until adequate data are available to refute a linkage.

3. MEDEP Comment 10

This issue concerns the Navy's proposal to collect only one round of groundwater quality data during the RI. The MEDEP asked that a minimum of two rounds be collected. As discussed at the August 13, 2002 technical meeting the MEDEP does not consider samples taken in 1998 as a legitimate substitute as a second round for confirmation, since site activities, environmental conditions, sample handling, and/or laboratory procedures may not be the same 5 years later. However, the MEDEP is considering the point raised at the technical meeting that at a significant enough variability between the 1998 round and the proposed round the Navy will conduct further investigation into the groundwater. What is considered "significant" has not yet been determined. Nevertheless, the MEDEP will review the Navy's submittal of a draft decision tree for the necessary number of sampling rounds before making a final decision.

4. MEDEP Comment 11

While the Navy's responses to the USEPA seem reasonable, several of the State's original questions were not addressed. Please add new text to the QAPP that provides some specific information and rationale for the proposed surface water sampling.

5. MEDEP Comment 20

The Navy's response did not provide the answer to the question posed, however, in rereading the QAPP, we interpret the following. Sediment sampling in Phase I will be analyzed for only nickel and copper to support an interim action. In Phase III the full TAL metals, SVOCs, PCBs and pesticides will be collected at the same locations as in Phase I, unless the interim action eliminated the sediments. This confusion could be eliminated if more cross-referencing were added to the report between sections. In this case, Section 4.3.4 might be referenced, or else the Section 4.0 overview be expanded to include analytical parameters for Phase III.

6. MEDEP Comment 22

The written response does not satisfy the State's request, however, upon discussion at the August 13, 2002 technical meeting the Navy did verbally agree to relocate proposed well MW-10 to the proposed TP-SB38 location. This relocation satisfies our concern regarding well location.

7. MEDEP Comment 24

The issue is that MEDEP expected a minimum of 7 days for stabilization between the end of well development and groundwater sampling. The QAPP specified a minimum of 4 days. If sampling occurs prior to 7 elapsed days, the MEDEP will view the resulting

concentrations as screening data suitable for the identification of general contaminant levels.

8. MEDEP Comment 26

“...neither SVOC TICs or DRO/GRO analyses can be used for evaluation of risk within a CERCLA risk assessment.”

MEDEP does not automatically rule out TICs from risk assessments. The State of Maine's Guidance Manual for Human Health Risk Assessments at Hazardous Substance Sites, June 1994, page 2-6 states, “It is often appropriate to eliminate sampling data for TICs from the data set. However, if concentrations or toxicities of TICs are very high – that is, if these compounds could substantially affect the outcome of the risk assessment – professional judgement may indicate that further chemical analyses are warranted.” Therefore, we expect the Navy to include SVOC TICs in the sample analysis so they may be evaluated for possible inclusion in a risk assessment.

9. MEDEP Comment 29

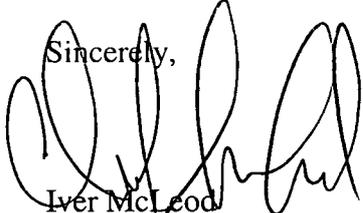
Our current perception from the QAPP and the August 13, 2002 technical meeting is that the Navy does not intend to sample the discharge from Outfall OF-63 before an interim action could be implemented. It is our understanding that the Navy feels that historic concentration data are sufficient for characterizing human health risks. These data were collected in 1996/97, and may not be representative of current conditions (due to the extended drought and/or changes at the site). While perhaps it is not critical to collect a current sample of OF-63, we believe the data could be quite useful in understanding the recent year mass loading OF-63 has contributed to Back Channel.

**Responses to MEDEP Comments Dated June 6, 2002 on Navy response to MEDEP comments on the Draft DQOs for the Draft Site 32 Remedial Investigation QAPP**

10. Item 1: In regard to organisms that have potential exposure to undiluted seep water for more than half of the tide cycle the Navy response states, “Seeps are not present at Site 32 that meet this definition.” Please indicate this fact in the text of the QAPP.

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

pc:

Denise Messier, MEDEP  
Larry Dearborn, MEDEP  
Michael Barry, USEPA  
Marty Raymond, PNS  
Debbie Cohen, TtNUS  
Ken Finkelstein, NOAA  
Ken Munney, USFWS  
Peter Britz, RAB  
Doug Bogen, RAB  
Don Card, RAB

Alan Davis, RAB  
Michele Dionne, RAB  
Mary Marshall, RAB  
Phil McCarthy, RAB  
Jack McKenna, RAB  
Diana McNabb, RAB  
Onil Roy, RAB  
Roger Wells, RAB  
James Horrigan, SAPL  
Carolyn Lepage, TAG Advisor  
Claire McBane, NH F&W  
File