



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NSY PORTSMOUTH
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July 1, 1993

Ms. Deborah Carlson
Remedial Project Manager
Department of the Navy/Northern Division
Naval Facilities Engineering Command
10 Industrial Highway Mail Stop # 82
Lester, PA 19113-2090

Re: Addendum to the RCRA Facility Investigation (RFI)
Report.

Dear Ms. Carlson:

The Department has received and reviewed the Addendum to the RFI Report which includes the Navy's responses to MEDEP and EPA comments on the RFI Report. The Department has some additional comments on the Addendum which are provided below.

1. Response to Comment 2

This response is not acceptable. In a December 29, 1992 letter to you, the Department asked that data be submitted in an acceptable reporting format. Examples of acceptable reporting formats were attached to that letter. The Data presented in Appendix III is not in an acceptable format. The data must be presented in table format. Another copy of an acceptable reporting format is attached.

2. Response to Comment 4

If the information is available for providing scaled maps why weren't they provided? At a minimum, site maps must be provided to scale.

3. Response to Comment 5

It is not clear if the site was ever remediated. P. 3-55 states that the pipeline was excavated and removed following detection of a leak. Where is the discussion about remediation?

4. Response to Comment 7

References to the bedrock topographic map should be removed from the text.

5. Response to Comment 8

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Enclosure D does include the seismic refraction lines drawn onto a scaled plan, however, we are particularly interested in seeing the seismic lines drawn at the same scale as the cross sectional maps.

6. Response to Comment 9

Station E8 does not appear to meet the requirements set forth in the workplan for a base station. Will this location adversely affect the results of the magnetometry survey?

7. Response to Comment 11

Background sampling to date does not achieve quantitative results that can be used in calculations. Achieving quantitative results is a stated primary data objective. Additional background sampling is necessary to meet the data quality objectives (DQO) set forth in the Work Plan. What is the status of the additional background sampling that was discussed at the Media Protection Standards meeting held in May? If the additional sampling does not meet the DQO's, additional background sampling will be required.

8. Response to Comment 22

The JILF is NOT a municipal landfill. The material described as "fill" found on page 3-29 does not meet the State of Maine Solid Waste Regulations for "inert fill", which is what the text implies constitutes this material. "Fill" is not defined in the Solid Waste Regulations. The material described in the landfill does meet the Department's definition of "hazardous waste". Use of the terms hazardous waste, or waste, would be acceptable to describe the material found in the landfill. All references in the text to "fill" at the JILF must be changed to hazardous waste, or waste.

9. Response to Comment 42

The text should also include that full characterization of the former pipeline was not accomplished because the appropriate depths were not sampled.

10. Response to Comment 47

If there is no measurable thickness of product (LNAPL) on the water table, then this well should be sampled for a complete list of parameters. It was my understanding that this monitoring well was not sampled due to the amount of free product on the water table. This well is very important and must be sampled for the full list of parameters.

11. Response to Comment 54

I understood that in 1978 dredge spoils from berths 6, 11, and 13 were placed over the southern portion of the landfill. A clay barrier was then placed over these dredge

spoils and a clay barrier was also constructed along the edge of the landfill between the landfilled material and Clark's Island Embayment. The extent of this barrier is not known. Why are you using the running track as the approximate location of the clay barrier? How do you substantiate that assumption?. Is there a protruding ridge along the perimeter of the landfill that you are assuming is the clay barrier?

12. p. 4-30-31., last sentence page 4-30

Where has it been determined that the low permeable barrier encompasses the landfill? The text should be changed to reflect that the extent of the barrier is not known.

13. Response to Comment 62

Some components of #6 fuel oil are denser than water, therefore, free product may exist in the bottom of the monitoring wells. When purging the monitoring wells at the DRMO, the bottom of the wells should be assessed for the presence of free product.

14. Response to Comment 63

The referenced paper indicates that purging procedures for sampling metals may have to be changed. There is no data to support that the filtered samples reflect groundwater quality relating to dissolved metals. The PHERE Study used filtered samples which conflicts with EPA Region I requirements for unfiltered samples. The conclusion that no risks are posed by onsite groundwater has not been properly assessed.

15. Response to Comment 64

Given the magnitude of the releases, the amount of time elapsed since the release occurred, and the fact that the fuel oil was released directly into fractured bedrock, the fuel oil found in the DRMO wells could be from the tank farm. However, your comments on viscosity are appreciated.

16. Response to Comment 65

Please submit a Table for all sampling done at the JILF, not just for inorganics.

17. Response to Comment 68

Petroleum related compounds, like the petroleum product found in FW-06, should be included in the Transport and Fate discussion.

18. Response to Comment 71

Please note in the text that while background station #9 had detectable concentrations of PCE with a southwesterly wind, none of the other stations detected PCE on that day. Location 3, 5, and 7 detected PCE on different days with concentrations, doubling that of the background station.

Sincerely,

Nancy Beardsley

Nancy Beardsley
Project Manager, Federal Facilities Remediation
Office of the Commissioner

Attachment: Reporting Format

cc: Mark Hyland, DEP
Troy Smith, DEP
Ernest Waterman, USEPA, Region I
Jim Tayon, Portsmouth Naval Shipyard

Table 4. Summary of Analytical Results for Volatile Organic Compounds in Ground-Water Samples Collected from Monitoring Wells,

Sample Designation:	MW-1	MW-1	MW-1	MW-1
Date Sampled:	4/25/88	8/1/88	5/16/89	8/28/89
Laboratory:	CAA	CAA	RAI	CAA
Parameter				
[concentrations in ug/L (ppb)]				
Chloromethane	--	--	--	--
Bromomethane	--	--	--	--
Vinyl chloride	--	--	--	--
Chloroethane	--	--	--	--
Methylene chloride	--	--	--	--
1,1-Dichloroethylene	--	--	--	--
1,1-Dichloroethane	--	--	--	--
trans-1,2-Dichloroethylene	--	--	--	--
Chloroform	--	--	--	--
1,2-Dichloroethane	--	--	--	--
1,1,1-Trichloroethane	--	--	--	--
Carbon tetrachloride	--	--	--	--
Bromodichloromethane	--	--	--	--
1,2-Dichloropropane	--	--	--	--
trans-1,3-Dichloropropene	--	--	--	--
Trichloroethylene	--	--	--	--
Chlorodibromomethane	--	--	--	--
1,1,2-Trichloroethane	--	--	--	--
Benzene	--	--	--	--
cis-1,3-Dichloropropene	--	--	--	--
2-Chloroethylvinyl ether	--	--	--	--
Bromoform	--	--	--	--
1,1,2,2-Tetrachloroethane	--	--	--	--
Tetrachloroethylene	--	--	--	--
Toluene	--	--	--	--
Chlorobenzene	--	--	--	--
Ethylbenzene	--	--	--	--
Total xylenes	--	--	--	--
Non-Priority Pollutants	-----			
Carbon disulfide	--	--	--	--
2-Butanone (MEK)	--	--	--	--
Vinyl acetate	--	--	--	--
2-Hexanone (MPK)	--	--	--	--
4-Methyl-2-pentanone (MIBK)	--	--	--	--
Styrene	--	--	--	--
Detection Limit	5	5	25(a)	5
ug/L (ppb)	Micrograms per liter (parts per billion).			
--	Not detected.			
CAA	Cambridge Analytical Associates, Boston, Massachusetts.			
RAI	Resource Analysts, Inc., Hampton, New Hampshire.			
(a)	Detection limit may vary among parameters. The detection limit shown is the highest among all parameters analyzed for this well.			