



STATE OF I E

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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GOVERNOR

EDWARD O. SULLIVAN
COMMISSIONER

July 6, 1995

Commanding Officer
Attn: Code 1823/Lt. Conroy
NORTHNAVFACENGCOM
10 Industrial Hwy, MSC 82
Lester, PA 19113-2090

RE: Navy Responses to MEDEP comments on the RFI Data Gap Report provided in MEDEP's March 8, 1995 letter for Portsmouth Naval Shipyard, Kittery, Maine.

Dear Jim:

The Maine Department of Environmental Protection (MEDEP) has reviewed the Navy's responses to MEDEP's comments on the RFI Data Gap Report. The MEDEP provides the following comments.

Comment 1

Navy Response:

..."No significant revisions will be made to the report format. The report is organized in accordance with the outline selected by the Navy."

Please clarify the meaning of this response. The response implies that because the report is formatted in accordance with the Navy's direction, that no changes will be made regardless of the value of the proposed changes. MEDEP's review and comments are submitted in good faith with the understanding that they will be considered seriously.

Comment 2

I believe Jim Tayon took photographs of the excavation at MBI. Please clarify.

Comment 9

What is the status of the MEDEP RFI Report comments re-evaluation? How will this re-evaluation be presented to MEDEP?

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Comment 20

Navy Response:

"Of the base/neutrals detected, PAHs were present at moderate concentrations compared with MPSs."

Do PAHs exceed MPSs?

Comment 27

It is still unclear how the collection of the soil gas sample was followed by groundwater sample collection. The Draft Data Gap Report text indicates "To collect the groundwater samples, the steel casing was removed following the soil gas sample collection." A disposable drive point was ejected from the end of the steel casing prior to collecting the soil gas sample. If the soil gas sample was collected "one to two feet above the saturated zone" as indicated in the Navy's response, the disposable drive point would have to be reinserted into the end of the steel casing prior to driving the casing into the saturated zone to collect a groundwater sample. It seems unlikely the disposable drive point could be reinserted by driving the casing back onto it. Please explain.

Comment 36

The MEDEP requested the use of arrows to indicate the surface water discharge points and flow directions for Upper and Lower Meade Ponds. The following response was provided by the Navy:

"Section 2.0 discusses the scope and methodology. Hydrogeologic results, including flow directions are presented in Section 3.0. Specifically refer to Map D and Map E discussed in Section 3.0."

Section 3.0 and Maps D and E provide information on groundwater flow. The MEDEP requested clarification of surface water flow directions. Please address our comment.

Comment 39

A specific seep location is not identified on Figure 2-7. The figure shows a "Seep Observation Area" including the entire portion of SWMU # 9 which borders Clark Cove. It appears that the seeps located in the Back Cove area were not included as part of this study. Please note in the text that the Back Cove seeps, which are also believed to emanate from the JILF and are typically visible at low tide, were not included in this study.

Comment 65

This response is not adequate. Regardless of whether or not the MPSs were finalized by EPA, the MEDEP's concerns should be addressed and our questions should be answered. Please address our comments.

Comment 66

How will TICs be addressed? Regardless of the uncertainty of the results MEDEP would like to see the quantitative data, merely denoting the detections with an "X" is not adequate. Please comply with our request to provide the results in Appendix H.

Comment 67

This response is not adequate. Please provide drinking water standards for comparison with compounds listed in table.

Comment 69

This response is not adequate. See # 66 above.

If you have any comments or questions, please call me at 207-287-2651. Thank you.

Sincerely,



Nancy Beardsley
Remedial Project Manager
Office of the Commissioner

pc: Meghan Cassidy, USEPA
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