



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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GOVERNOR

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COMMISSIONER

June 13, 1996

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

RE: Draft Community Relations Plan for Portsmouth
Naval Shipyard Kittery, Maine, May 1996

Dear Jim:

The Maine Department of Environmental Protection (MEDEP) has reviewed the Navy's Draft Community Relations Plan. The MEDEP's comments are provided below.

Specific Comments

1.) 2.2 History, Page 2-3, Para 2

It might be helpful to the reader to note that along with EPA, the MEDEP has played a regulatory role in the cleanup of this site. Especially since the report states in a later section, i. e., 2.2.3, that the "...MEDEP have coordinated the transition from RCRA to the CERCLA/Superfund process" and "... the MEDEP and the Navy will continue to work toward site cleanup ...".

2.) 2.2 History, Page 2-3, Para 5

Why single out the HWSF? There are many other areas at the Shipyard that are regulated by the MEDEP, i.e., mixed waste, air emissions, solid waste, oil terminals, etc.

3.) 2.2.1 Onshore Studies, Page 2-4, Para 3

"The Ambient Air Monitoring Report (McClaren/Hart, 1992a) was developed to support identification..."

Please revise text to include the most recent version of the Air Monitoring Report, dated June 1996.

Serving Maine People & Protecting Their Environment

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4.) 2.2.2 Offshore Studies, Page 2-5, Para 2

"Phase I and Phase II data and conclusions were synthesized to develop the final EERA"

The EERA is in a draft final stage as described in the next sentence. Please revise text.

5.) 2.2.2 Offshore Studies, Page 2-5, Para 2

"These needs are to be addressed in the Offshore Interim Monitoring/Verification and Data Gap Studies Work Plan (B & R Environmental, 1995) currently in the Rough Draft stage."

This report has not been submitted for the MEDEP's review. I don't believe the public will be able to distinguish Rough Draft from Draft or Draft Final. The MEDEP recommends that you note that at this time the report is available for Navy review only.

6.) 2.2.2 Offshore Studies, Page 2-5, Para 3

"The data collected during Phase I of the Ecological Risk Assessment work were also used to develop the Human Health Risk Assessment for Offshore Media (McLaren/Hart, 1994c)."

The data collected from Phase II is currently being evaluated to assess human health risk.

7.) 2.2.2 Offshore Studies, Page 2-5, Para 4

"Once both the Ecological and Human Health MPSs have been finalized..."

The MEDEP understands that the Navy ecological and human health MPSs will not be combined to develop one set of MPSs. It is our understanding that the ecological and human health MPSs will be used in the development of Preliminary Remediation Goals. Please clarify.

8.) 2.5 Site Screening Areas, Page 2-19, Para 2

"These areas will be addressed by the Federal Facilities Agreement."

It is not clear what is meant by "addressed". Investigation of these sites is not contingent upon the Federal Facilities Agreement.

9.) 2.5.3 Site 31 - West Timber Basin Landfill, Para 5

"A second timber basin, that had been..."

Please locate the second timber basin on a plan and provide any information relating to the site.

10.) 3.0 Regulatory Process Activities, Page 3-1, Para 2

The text in this section doesn't flow very well from one paragraph to the next. Consider rewriting.

11.) 3.1.1 Preliminary Assessment/Site Investigation and Site Screening Process, Page 3-3, Para 5

"The Site Screening Process (SSP) is the FFA's alternative to the PA/SI process."

The SSP originated from either the Navy or EPA, but is not a product of the FFA.

12.) 9.0 Community Relations Plan Implementation, Page 9-2, Para 1

Please add "Attend public meetings".

13.) Appendix B, Page B-2, MEDEP

Please change "Project Coordinator" to "Project Manager".

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

Sincerely,



Nancy Beardsley
Project Manager, Division of Remediation
Bureau of Remediation and Waste Management

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