



STATE OF MAINE

# DEPARTMENT OF ENVIRONMENTAL PROTECTION

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December 19, 1996

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

RE: Final On-Shore/Off-Shore Contaminant Fate and Transport Modeling Phase I Work Plan for Portsmouth Naval Shipyard, and Low Flow Pilot Study Letter Report for Portsmouth Naval Shipyard, Kittery, Maine

Dear Fred:

The Maine Department of Environmental Protection (Department or MEDEP) has reviewed the above referenced documents. I have provided the Department's comments below.

## On-Shore/Off-Shore Contaminant Fate and Transport Modeling Phase I Work Plan for Portsmouth Naval Shipyard

### 1) Basic Analytical Equations, Section 7.3, p. 7-4

"In the conceptual model shown in Figure 6-2, the contaminant source area is separated from the water table by a layer of uncontaminated soil. Conceptually, it will take some amount of time for contaminants in the source area to migrate vertically to the groundwater. During this time the contaminants have the potential to decay so that the concentration of the leachate at the water table...could be less than at the source..."

The Navy should also consider situations in which the contaminant source area is not separated from the water table such as in the Jamaica Island Landfill (JILF). In such a case the concentration of the leachate at the water table would equal the concentration at the source, as happens with conservative, non-decaying substances.

*Serving Maine People & Protecting Their Environment*

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**Low Flow Pilot Study Letter Report for Portsmouth Naval Shipyard, Kittery, Maine**

1) pH, Specific Conductivity, Salinity, p. 2, para 3

There is no discussion of stabilization of temperature in terms of purge volume in this section.

2) Recommendations, p. 6, para 2

"If stabilization of eH and dissolved oxygen do not occur, the maximum purge time should remain one and one-half hours."

The MEDEP agrees that purging for one and one-half hours is adequate.

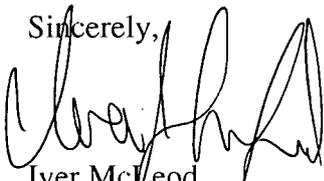
3) Recommendations, p. 6, para 4

"Wells that are not significantly tidally influenced will be sampled independent of the tide...Resolution of this item is required to develop a detailed field planning effort."

The MEDEP concurs that wells that are not significantly tidally influenced, i.e., tidal range is less than or equal to 1 ft, may be sampled independent of the tide.

Please feel free to contact me at (207) 287-8010 if you have any questions.

Sincerely,



Iver McLeod  
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Bureau of Remediation and Waste Management

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