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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

December 23, 1996

Mr. Fred Evans
Northern Division
Naval Facilities Engineering Command
10 Industrial Hwy.
Mail Stop #82
Lester, PA 19113-2090

Re: Draft Conceptual Model for Site Screening Process Plan
Portsmouth Naval Shipyard
Kittery, Maine

Dear Fred:

The United States Environmental Protection Agency (EPA) has reviewed the draft Conceptual Model for Site Screening Process Plan for the Portsmouth Naval Shipyard.

EPA's comments on the above-referenced document are provided in Attachment I to this letter.

If you have any questions regarding these comments, please contact me at (617)573-5785.

Sincerely,

Meghan F. Cassidy

Meghan F. Cassidy
Remedial Project Manager

Enclosure

cc: Marty Raymond/PNS
Iver McLeod/ME DEP
Carolyn Lepage/Lepage Environmental
RAB Members
Sarah Levinson/EPA

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ATTACHMENT I

The following are EPA's comments on the draft document entitled "Conceptual Model for Site Screening Process Plan" for the Portsmouth Naval Shipyard in Kittery, Maine.

1. In general the conceptual model is not clear as to the purpose or goal of the Site Screening Process. It was EPA's impression that the Site Screening Process was meant to provide preliminary information regarding a site to determine whether that site should proceed into the Remedial Investigation process (i.e., Whether it is likely that contamination may be present and whether an investigation to determine the nature and extent of contamination is warranted.). The purpose must be more fully discussed since agreement on the goal of the process dictates the requirements.

1. Page 1: The second sentence of this paragraph should include Remedial Investigation/ Feasibility Study as part of the parenthetical statement.

2. Page 2. Section 2.0, Purpose: In line 4, change "...disposal of hazardous substances has occurred" to "...disposal of hazardous substances may have occurred." EPA does not believe that a site visit or review of historical information will provide sufficient information to make a definitive statement regarding whether disposal has occurred.

Please note that this comment applies to several other sections of the document and should be changed appropriately.

3. Page 2, Section 3.0, Media: The Region I uses 0 to 12 inches as the default for acceptable surface soil sampling.

4. Page 3, Section 3.0, Analytical: The text indicates that validation will only be required for TCL organics and TAL inorganics. EPA is not willing to agree to this at this time. QA/QC requirements will be reviewed and commented on in conjunction with specific Quality Assurance Project Plans.

5. Page 3, Section 4.0, Purpose and Activities: These sections refer repeatedly to additional field work. Clarify what is meant by "additional field work". Isn't the field work discussed here the first round of field work?

6. Page 4, Item #5, Sediment: Clarify what values are intended to be used as sediment PRGs?

7. Section 5.0: EPA has several risk-based concentration approaches available. Since there is no specific information presented here to explain which RBCs are being referred to, EPA assumes that the appropriate RBCs or RBC approach will be proposed in each individual Site Screening Process Work Plan. Verify that this is the correct assumption.

8. Section 5.1, Items 2-5: The following comments pertain to this section.

- ☐ Provide additional information regarding which chemical concentrations in the affected media are to be compared to the specified criteria (i.e., the maximum observed, an average, 95% upper confidence limit on the average, etc.).

- ☐ Provide additional information regarding which contaminants are to be evaluated against the specified criteria. Will it be all contaminants or a subset? If a subset, how will the subset be chosen?

- ☐ For any groundwater that could be considered a future drinking water supply, compliance with MCLs should be included in the screening.

- ☐ Provide additional information regarding the Ambient Water Quality Criteria (AWQC) referred to in the surface water and sediment screening evaluation. Are the AWQCs proposed for the protection of human or aquatic organisms? Are the sediment quality criteria protective of potential human exposures?

- ☐ In item 6, consider elaborating upon what it means to have an "exceedance" of one of the identified criteria. For example, does a single exceedance of one criterion mean that a no further action cannot be recommended?

9. Page 5, Section 5.2, paragraph 2: There may be instances where it is determined that an on-shore ecological habitat does exist. Therefore, in certain limited circumstances potential risk to terrestrial ecological receptors may have to be considered.

10. Page 6, Section 6.0: This section does not make it clear that the goal of the SSP is to determine whether a site should be included in the RI/FS process. This should be more clearly explained.

In general, EPA does not think a second round of data collection would be part of the Site Screening Process. It was our understanding that should the findings of the Site Screening Process indicate that additional data collection is warranted a Remedial Investigation Work Plan would be prepared for the Site Screening Area (SSA).

11. Page 6, Section 6.0, Item #1: Regulatory concurrence cannot be obtained prior to regulatory review of the Site Screening Process Report.

12. Page 8, last paragraph, 3rd sentence: This sentence says "a chemical will be considered infrequently detected if it is detected in only one sample per media." Frequency of detection must consider the number of samples available. EPA will evaluate whether a chemical should be considered a contaminant of concern (COC) on a case-by-case basis.

13. As discussed during the September 20, 1996 Project Managers' meeting, the Site Screening Process Report should also include: 1) a relative risk ranking for the SSA; 2) a proposed schedule for the SSA if further work is recommended.