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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

July 21, 1999

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

Re: Response to Comment Letter
Draft Facility Background Development Report
Portsmouth Naval Shipyard
Kittery, Maine

Dear Fred:

The United States Environmental Protection Agency (EPA) has reviewed the Navy's letter (dated June 17, 1999) providing responses to comments EPA submitted in relation to the draft document entitled "Facility Background Development" for the Portsmouth Naval Shipyard in Kittery, Maine. EPA's comments on this draft document were submitted on March 3, 1999.

Based on EPA's review of the responses, EPA has the following comments.

1. Response to Comment No. 5: The Navy states that the referenced concentration (1,100 mg/kg) was an outlier and was deleted from the background data set used to determine the representative background concentration. The Navy further states that in Section 2.3, the maximum lead concentration in the soils was identified **after** outliers were deleted. For clarification, the text in paragraph 1 on page 2-4 should specify that the maximum concentration of lead (543 mg/kg) excludes outliers. It would also be helpful if the text in the third bullet on page 2-2 is revised to state that the referenced concentration (1,100 mg/kg) was an outlier.

2. Response to Comment 7: The Navy states that the primary reason for the discussion of petroleum-related organics in groundwater as a background issue is to acknowledge that diesel fuel and/or gasoline range organics were detected in the groundwater. The bullet should include a statement that although petroleum-related organics in groundwater were analyzed, the values for these compounds were not used in the risk assessment to eliminate chemicals of potential concern. It should also be stated that the rationale for including these detections in the text was to establish that these compounds are present in background samples from this area. The statement that the detections "do not appear to

influence the inorganic profile of the samples" is unclear and should be deleted from the text or further explained in the context of the risk assessment.

If you have any questions regarding this matter, please contact me at (617)918-1387.

Sincerely,

Meghan F. Cassidy

Meghan F. Cassidy
Remedial Project Manager

cc: Marty Raymond/PNS
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