

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



JOHN ELIAS BALDACCI
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September 2, 2004

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

re: Draft FY05 Amended Site Management Plan, Portsmouth Naval Shipyard, Kittery, Maine, July 2004

Dear Fred:

The Maine Department of Environmental Protection has reviewed the document referenced above. The Department's comments follow.

~~CONFIDENTIAL~~

General Comment

1. The biggest change to the schedule compared to the FY04 Amended SMP, as discussed at our 8/11/04 Project Management meeting, is the extended time period for remedial activities at OU2. As discussed at the RPM meeting this is the result of the project's budget. The budget does not allow for a shortened OU2 remedial construction schedule while still working on other OUs at the Shipyard. The MEDEP is not happy about the seven-year remedial construction period but recognize that it is preferable to a shortened OU2 remedial construction schedule with no work on other OUs.

Nevertheless, there are still questions regarding elevated lead concentrations at MS-11 location 3, offshore of the DRMO. While this may be potentially attributed to contaminants upstream of the DRMO it is important to keep an eye on conditions at OU2 should it be found that lead-contaminated soil is being released to the river despite the 2000 shoreline stabilization. The MEDEP will strongly support any interim actions or short-term removal actions that may be necessary at OU2 to prevent any potential future releases of contaminated soil to the river.

Specific Comments

2. 6:2 Documents Completed After Signature of FFA, p. 6-3

In the first sentence shouldn't "July and September 2003" be changed to "July and September 2004"?

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3. OU1 schedule

On February 6, 2004 the Navy submitted a time extension request of 359 days for OU1. On February 17, 2004 the MEDEP indicated its agreement with the request. This extension is accurately indicated in the FY05 Amended SMP (with the inclusion of 18 days for a total extension of 377 days). We have no further comments regarding the OU1 Schedule.

4. OU2 schedule

See General Comment 1 above.

5. OU4 schedule

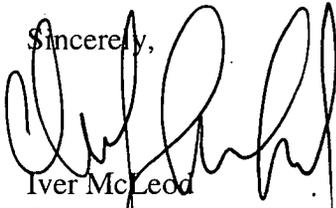
This schedule has been changed to reflect the fact that the Navy will address remedial options for OU4 upon completion of the onshore sites. As the Navy stated in the list of "Schedule Revisions", "The Navy will continue to consider how offshore areas of onshore sites may be addressed concurrently with onshore actions and if interim actions are necessary prior to completing the OU4 FS." As the MEDEP has stated previously we strongly support such consideration.

6. OU8 schedule

The Navy has changed the start date for the RI work plan from March 2010 to January 2011. Given the low priority of this site the MEDEP has no objections to this change.

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

Sincerely,



Iver McLeod

Project Manager

Bureau of Remediation and Waste Management

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