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LETTER AND COMMENTS REGARDING SITE SCREENING PROCESS PLAN NSY  
PORTSMOUTH ME  
9/21/1997  
LEPAGE ENVIRONMENTAL SERVICES

# Lepage Environmental Services, Inc.

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September 21, 1997

Peter Vandermark  
Seacoast Anti-Pollution League  
P. O. Box 1136  
Portsmouth, New Hampshire 03802

Subject: *Review Comments, Site Screening Process Plan*

Dear Mr. Vandermark:

As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the *Site Screening Process Plan* (the plan) dated August 1997 and prepared by Brown & Root Environmental. The plan presents the mechanism for providing preliminary information about a site to determine if further action, such as a Remedial Investigation/Feasibility Study, a Removal Action, or no further action, is necessary. It describes the process for determining whether storage, release, or disposal of hazardous substances may have occurred.

We reviewed the May 1997 draft plan and submitted comments on our letter dated June 26, 1997. The Navy's responses to those comments, along with responses to comments submitted by the U.S. Environmental Protection Agency (U.S. EPA), and the Maine Department of Environmental Protection (MEDEP) are included in the attachment section of the current plan. For the most part, the Navy has either revised the text to address comments or questions, or has presented a clarification in its responses with no changes to the plan itself. Our comments on the current draft are as follows:

- 1. Page 1, Section 1.0.** The text of the third paragraph has been revised to include consistency with U.S. EPA guidance. If this guidance is a specific document or documents, please provide a citation(s). If guidance does not refer to a specific reference, additional clarification should be provided describing the basis and nature of the guidance.
- 2. Page 2, Section 2.0.** The text states that the site visit will be conducted in accordance with Standard Operating Procedure (SOP) GH-1.1 developed in 1996 by Brown & Root Environmental for activities at the Shipyard. The focus of SOP GH-1.1 appears to be on determining the logistical details necessary to efficiently plan and conduct a previously-scheduled hydrogeologic investigation. These details include access for drill rigs, sources of potable water for drilling and other on-site activities, and where to park the site trailer in order to hook up to utilities. While much of this information would prove useful should there be a need for additional investigations at the site, the purpose of the site screening reconnaissance is to look for

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Site Screening Process Plan

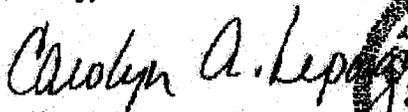
indications or evidence that storage, release, or disposal of hazardous substances may have occurred at the site. It would be appropriate to "customize" the site reconnaissance checklist to focus on the purpose of the site screening reconnaissance and to include the specific items or issues identified in the site screening process plan. These include observations of stained soil, stormwater and floor drains, and transformers. In addition, the introductory sentence to the Hydrogeologic Assessment section of the checklist mentions looking for situations that promote hazardous substance migration. While those situations are indeed important, information concerning barriers or impediments or other factors affecting migration may also be necessary to develop recommendations for future actions.

3. Page 10, Section 6.0. The Navy removed references to the Federal Facilities Agreement (FFA) because the FFA has not yet been negotiated. What is the status of the Site Management Plan (SMP) mentioned below the bulleted items? What does the SMP address?

4. Page 11, Section 6.0. The definition of an infrequently detected chemical needs additional clarification. If it is detected in one of two samples per media, that's a 50% "hit" rate, which doesn't appear to be infrequent.

If you have any questions regarding the comments above, please give me a call at 207-777-1049.

Sincerely,



Carolyn A. Lepage, C.G.  
President



cc: Iver McLeod, MEDEP  
Meghan Cassidy, U.S. EPA

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