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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT LEAD  
MODELING AT DEFENSE, REUTILIZATION AND MARKETING OFFICE IMPACT AREA NSY  
PORTSMOUTH ME  
8/6/1998  
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

August 6, 1998

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

Re: Draft IEUBK Lead Modeling at DRMO Impact Area  
Portsmouth Naval Shipyard  
Kittery, Maine

Dear Fred:

The United States Environmental Protection Agency (EPA) has reviewed the technical memorandum entitled "Lead Contamination at DRMO Impact Area, Portsmouth Naval Shipyard, Kittery, Maine". The technical memorandum is dated April 6, 1998. The document was transmitted to EPA for review with a cover letter dated July 15, 1998.

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)673-5785.

Sincerely,

A handwritten signature in cursive script that reads "Meghan F. Cassidy".

Meghan F. Cassidy  
Remedial Project Manager

Enclosure

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

## ATTACHMENT I

The following are EPA's comments on the technical memorandum entitled "Lead Contamination at DRMO Impact Area, Portsmouth Naval Shipyard, Kittery, Maine". The technical memorandum is dated April 6, 1998. The document was transmitted to EPA for review with a cover letter dated July 15, 1998.

### Specific Comments

- (1) What were the sampling depths of samples SS-06 and SS-07? Please change information in text and in models (see comment #3) as appropriate.
- (2) Since the maximum lead concentration, which gave Integrated Exposure Uptake Biokinetic (IEUBK) blood lead level model results greater than 10 ug/dl, was detected at sample location SS-23S, Please describe the area this sample represents (i.e., is it on a hill?, is the soil easily accessed/a garden/highly vegetated?, are there any reasons why a child would prefer to play in this area of the yard versus the rest of the yard?, etc). Please address this in the text.
- (3) Since the lead concentration input for IEUBK Model should represent a potential exposure area, please rerun the model at the 0 to 0.5 foot surface soil depth (Surface soil is defined as 0 to 1 foot for human health evaluations) for each of the three residences:
  - at the "N" residence (samples SS- 17S, 18S, 19S, 20S, 21S, 22S, and 23S),
  - at the 68 residence (samples SS-06S and 07S),
  - and the "S" residence (Samples SS- 14S and 16S).

Please also include sample SS-15S in the appropriate residence evaluation (this sample was not depicted on figure 2-9 of the March 1994 Public Health and Environmental Risk Evaluation used to determine sample locations). Please also recalculate the indoor air concentration for inclusion in the IEUBK model.