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LETTER AND COMMENTS ON BEHALF OF SEACOAST ANTI POLLUTION LEAGUE  
REGARDING DRAFT PROPOSED PLAN FOR INTERIM ACTION AT OPERABLE UNIT 4 (OU  
4) NSY PORTSMOUTH ME  
9/9/1998  
LEPAGE ENVIRONMENTAL SERVICES

# Lepage Environmental Services, Inc.

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September 9, 1998

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

Subject: *Review of Draft Proposed Plan for Interim Action at Operable Unit 4*

Dear Mr. Vandermark:

As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the August 1998 *Draft Proposed Plan for Interim Action at Operable Unit 4*. Operable Unit 4 (OU4) includes the areas offshore Portsmouth Naval Shipyard potentially impacted by onshore shipyard sites. The Plan was prepared by Brown and Root Environmental and summarizes the Navy's proposed interim action for OU4. The Navy intends to conduct environmental monitoring in the offshore area until the Feasibility Study for OU4 is released and a final remedy is selected and implemented. In addition to the opportunity to comment on this draft report, we will also have an opportunity to provide verbal input at the public meeting to be held later this fall and written comments on the final version of the Plan when it is released in a few weeks. Our comments on this version of the Plan are as follows:

- 1. Page 1, Learn More About the Proposed Plan...** The first sentence should reflect that the Navy will also hear comments, not just questions, from the public.
- 2. Page 2, Site Background.** The third sentence in the first paragraph isn't complete. Perhaps it should read: PNS's shipbuilding history dates back to the 1800s and the Shipyard has been engaged in the construction, conversion..., or, ...dates back to the 1800s and includes construction, conversion...

The sentence in the second column about Sites 5 and 26 is a bit confusing to those unacquainted with the Shipyard's Operable Units and Sites.

The dates of the *Community Relations Plan* (the one we have is dated October 1996) and the *Estaurine Ecological Risk Assessment* (April 1997), as well as for other references mentioned elsewhere in the Plan, should be provided. Also, the text should reflect that the ecological risk assessment cited is the Draft Final version. It might help the reader if the titles of documents mentioned in the text were italicized.

**3. Page 3, Summary of Offshore Investigations.** The acronym RCRA should be defined.

**4. Page 4, Summary of Offshore Investigations.** The statements in the first column that the human health risk assessment did not consider whether chemicals that cause risk in seafood were from PNS sources or from other sources, and that the concentrations of chemicals detected in seafood in the Lower Piscataqua River were equal to or lower than other areas of the State is misleading. Section 6.0 of the Executive Summary from the May 1994 *Final Health Risk Assessment Report for Off-Shore Media* states the following:

“USEPA risk estimates were exceeded for ingestion of lobsters, clams, and flounder for five inorganics (arsenic, lead, mercury, cadmium, and copper), ten pesticides, four PAHs, and total Arochlors. However, of these, lead is the only contaminant which shows levels in off-shore media adjacent to the Shipyard which are elevated over other areas of the estuary, and for which a source has been identified in the On-Shore Study of the Shipyard. Therefore, lead is the only contaminant identified off-shore which is easily linked to activities at the Shipyard. This finding is consistent with the results of the On-Shore RCRA Facility Investigation and Human Health Risk Assessment, which identified lead in surface soils at the DRMO (SWMU#6) as a source of contamination resulting in estimated human health risks which are unacceptable. The lead found in sediments and biota in the estuary, is probably the result of surface soil runoff from the DRMO into the estuary.”

This statement clearly indicates the Shipyard has had a recognizable adverse impact on the offshore environment that is significant in terms of human health risks. The Navy must revise the text to reflect this.

**5. Page 5, Identification of the Proposed Interim Action.** In addition to the remedial action objectives (RAOs) and general response actions (GRAs) discussed at the March 1998 technical meeting, the group also discussed preliminary remediation goals (PRGs) at the May meeting. Also, the text should be revised to state that RAOs are qualitative, not quantitative.

One of the purposes of the proposed interim monitoring is to address some of the data gaps and uncertainties identified in the April 1997 Draft *Final Estuarine Ecological Risk Assessment*. This point should be mentioned in the text of this Plan.

**6. Page 6, Table 3.** It is not clear from the information contained in the table why disposal is a stand-alone GRA. It would appear that disposal would occur as a component of removal and ex-situ treatment actions. The Navy should clarify this point.

**7. Pages 7 & 8, Evaluation of the Proposed Action.** With regard to compliance with applicable or relevant and appropriate requirements (ARARs) described in the second bullet in the right column, the proposed interim action would allow the Navy to monitor environmental

Draft Proposed Plan for Interim Action at OU4

conditions to determine if ARARs are being met, but the action itself would not comply with ARARs. Please clarify.

The fifth bullet in the right column also needs clarification. Short-term effectiveness refers to the likelihood of adverse environmental or human health impacts during implementation of an alternative. While the proposed interim action does not pose a threat and might warn of an adverse impact, monitoring itself cannot eliminate detrimental effects.

Is the last paragraph in the section (on page 8) supposed to be a bullet?

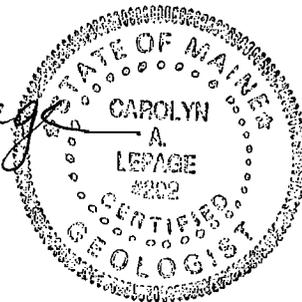
**8. Page 8, Glossary of Technical Terms.** The definition of Responsiveness Summary should specify that it includes a summary of written and oral comments (and responses to comments) made during the public comment period.

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



Enc.

cc: Iver McLeod, Department of Environmental Protection  
Meghan Cassidy, Environmental Protection Agency  
Marty Raymond, Portsmouth Naval Shipyard