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LETTER AND COMMENTS ON BEHALF OF SEACOAST ANTI POLLUTION LEAGUE  
REGARDING DRAFT APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
TABLE FOR INTERIM RECORD OF DECISION FOR OPERABLE UNIT 4 (OU 4) NSY  
PORTSMOUTH ME  
10/19/1998  
LEPAGE ENVIRONMENTAL SERVICES

# Lepage Environmental Services, Inc.

P. O. Box 1195 • Auburn, Maine 04211-1195 • 207-777-1049 • Fax: 207-777-1370

October 19, 1998

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

Subject: Review of Draft ARAR Table for Interim Record of Decision for Operable Unit 4

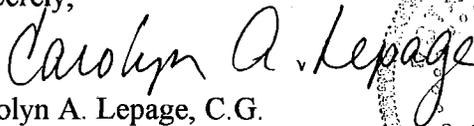
Dear Mr. Vandermark:

As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the Draft ARAR Table for Interim Record of Decision for Operable Unit 4. ARARs are federal or state environmental standards, requirements, or criteria that may be considered 'Applicable or Relevant and Appropriate Requirements' (hence ARARs) for a remedial action. Our comments are as follows:

1. The ARAR table should be subdivided to tabulate chemical-specific, location-specific, and action-specific ARARs separately.
2. We understand the Maine Department of Environmental Protection will be commenting on adding ARARs relating to the classification of estuarine waters, the 1987 State rule regarding sampling and biological analysis, and the special licensing requirements for sampling juvenile lobsters. We concur with these additions to the ARAR table.
3. The State of Maine Fish and Shellfish Consumption Advisories (see enclosed copy) should also be added to the ARARs table.

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: Iyer McLeod, Department of Environmental Protection  
Meghan Cassidy, Environmental Protection Agency  
✓ Marty Raymond, Portsmouth Naval Shipyard