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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
THE DRAFT TECHNICAL MEETING FROM 10 MAY 2002 NSY PORTSMOUTH ME
6/4/2002
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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June 4, 2002

Portsmouth Naval Shipyard
Code 106.3R, Bldg. 44
Attn: Ms. Marty Raymond
Portsmouth, New Hampshire 03804-5000

Subject: Draft Minutes, May 10, 2002 Technical Meeting on OU3 Phase 1

Dear Ms. Raymond:

We are transmitting comments by Lepage Environmental Services, Inc. (Lepage), on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the Draft Minutes of the May 10, 2002 Technical Meeting on OU3 Phase 1. Our comments are based on notes made during the meeting, as well as the handouts provided at the meeting. We also used the same initials as the draft minutes to indicate who spoke.

1. Page 1, Attendees List. The phone number for Carolyn Lepage should be 207-777-1049.

2. Page 1, Handouts. The bullet for the Section 7 Excerpts should identify the document that the section was taken from. We note that copies of two 5/9/02 email messages from Iver McLeod of the Maine Department of Environmental Protection (MEDEP) were also distributed at the meeting. One email was directed to Dawn Hollowell and Harrison Bispham and contained emails from the Army Corps of Engineers (ACE) regarding ACE jurisdiction for Phase 1 activities. The second was directed to James Briggs and contained comments on the agenda proposed for the May 10th meeting. These handouts should also be listed.

3. Page 2, AGENDA ITEM 1, Design QA. On pages 1 and 2, the minutes include a summary of concerns voiced by reviewers regarding inconsistencies among the submittals. The third bullet on page 2 lists some of the reasons for the inconsistencies. The fact that, because of the schedule, Foster Wheeler and ACE documents were being issued at the same time (Foster Wheeler got the ACE specs at the same time as the Restoration Advisory Board) should be added to the third bullet. The last bullet above the ACTION heading correctly states the MEDEP asked for quality assurance information. However, our notes indicate that MEDEP wanted that Quality Assurance Plan on ACE letterhead, and that a QAP is required by state regulation (Chapter 401?). With regard to the bullet under the ACTION heading, our notes indicate that ACE and Foster Wheeler (DR & CT), not EFANE, would compile the QAP, and that the MEDEP (HB) strongly recommended that whoever compiles the QAP should talk with Harrison Bispham (HB).

4. Pages 2 & 3, AGENDA ITEM 2, Construction Work Plan Contingency Language. As written, this section appears to focus on intact drums. It should also state what will happen should a drum be spilled (per CT, recover what's spilled). Section 7.6 was handed out during the meeting, and should be referenced in the minutes for this section.

5. Page 3, AGENDA ITEM 3, Turbidity Curtain. The MEDEP (HB) stated that information must be added to the document to identify who would be watching over Foster Wheeler. The document must also include the commitment to stop work if monitoring of conditions indicated a potential problem. The ACTION for this item should be revised accordingly.

6. Page 3, AGENDA ITEM 4, Surcharge Pile. Our notes indicate the MEDEP is also concerned with material from the surcharge pile making it to the river.

7. Page 4, AGENDA ITEM 5, Sampling and Analysis, and AGENDA ITEM 8, Depth Mudflat Excavation. The actions associated with each of these two agenda items should be spelled out under an ACTION heading.

8. Page 6, AGENDA ITEM 14, Parking Lot Drainage Discharging to Jamaica Cove. This agenda item is incorrectly identified as an action item. Please correct.

9. Page 7, ACTION ITEMS Table. The action items listed in this table don't match the actions listed under specific agenda items. What is the purpose of this table?

Please give me a call at (207) 777-1049 if you have any questions about my comments.

Sincerely,

Carolyn A. Lepage

Carolyn A. Lepage, C.G.
President



cc. James Horrigan, SAPL
Iver McLeod, MEDEP
Meghan Cassidy, USEPA