

N00102.AR.002317
NSY PORTSMOUTH
5090.3a

LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON
PRELIMINARY DATA QUALITY OBJECTIVES FOR FORMER CHILD DEVELOPMENT
CENTER NSY PORTSMOUTH ME
6/5/2002
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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

June 5, 2002

Portsmouth Naval Shipyard
Code 106.3R, Bldg. 44
Attn: Ms. Marty Raymond
Portsmouth, New Hampshire 03904-5000

Subject: Preliminary Data Quality Objectives (DQOs) for the Former CDC

Dear Ms. Raymond:

We are transmitting comments by Lepage Environmental Services, Inc., (Lepage) on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the Preliminary Data Quality Objectives (DQOs) for the Former CDC (Child Development Center). Our comments are as follows:

- 1. Page 1, Opening Paragraph.** The opening sentence states that the DQOs were developed for the investigation of the extent of lead contamination at the former CDC. However, the DQO steps focus on investigating the extent of contamination in the immediate vicinity of a "hot spot", and not the entire site. The purpose should be restated.
- 2. Page 1, Site History.** The second paragraph states that after the CDC activities were moved to a different location, the building and playground materials were removed and the area where the building stood was regraded and vegetated. What is known about the extent of regrading at the site? Was the area in the vicinity of the "hot spot", sampling location SS-107, affected? Additional information must be provided to assure that the area surrounding and including SS-107 that the Navy is proposing to sample was not disturbed during the building dismantling or site regrading and planting. Otherwise, the assumption should be that the "hot spot" material may have been spread about the site, and the investigation redesigned to address the change in contaminant distribution.
- 3. Pages 3 & 4, Risk Evaluation.** The sentence at the bottom of page 3 characterizes the maximum lead concentration as very localized, a hot spot. The text continues at the top of page 4 with the statement that the spot nature of the lead contamination would tend to limit the probability of exposure. However, the distribution of sampling locations on Figure 1 shows that there were no samples collected to the northeast, east, southeast, and south of SS-107. There is no data regarding contamination (or exposure) for more than half of the area surrounding SS-107. While it is easy to use "hot spot" when referring to SS-107, any statements regarding the extent

of contamination and risk exposure associated with SS-107 should be qualified regarding the lack of samples to characterize more than half of the area around that location.

4. Page 5, Lead Hot Spot Evaluation. The last bullet states that a site average lead concentration has to be greater than 400 mg/kg (the residential lead screening level) to represent an unacceptable lead exposure. SAPL concurs with the Maine Department of Environmental Protection (MEDEP) comment number 5, dated 5/31/02, that regardless of the average concentration in a ½-acre area, any concentrations of lead as high as 35,000 ppm must be removed. SAPL also believes that the process of calculating site average based on area weighting seems overly complicated. If the soil at SS-107 must be removed, why not also remove the soil from those sampling locations where the lead concentration exceeds the residential lead screening level, regardless of area weighting or averaging.

5. Page 6, Data Quality Objective Step 2: State the Decision(s). The Decision Statement concludes that if the area-weighted arithmetic average concentration of lead for the site as a whole does not exceed 400 mg/kg, no further action will be recommended. As stated in comment number 4, above, it is not acceptable to leave lead contamination of 35,000 ppm at the site. The Navy will have to perform some action to address location SS-107 at a minimum. The Decision Statement must be rewritten.

6. Page 6, Data Quality Objective Step 3: Specify the Inputs to the Decision(s). Samples up to 2 feet bgs for vertical extent must (not may) be collected to verify the assumption that contamination at the CDC site is limited to surface soil and that sub-surface soils do not present a risk.

7. Page 7, Data Quality Objective Step 4: Establish the Study Boundaries. The first bullet should be rewritten to state that the area northeast, east, southeast, and south of SS-107 have not been sampled previously.

8. Page 7, Data Quality Objective Step 5: Decision Rules. Comment number 4, above, applies to this section. Why not just compare the actual concentrations with the residential screening criteria to determine which locations, if any, must be removed along with soil from SS-107.

9. Pages 8 & 9, Data Quality Objective Step 7: Sampling Plan Design. Comment number 4, above, applies to the first two bullets in this section. The statement in the third bullet regarding the (lack of a) preferential pathway should be clarified or rephrased. What is the basis for stating that a preferential pathway does not exist if the source is not known. Comment 2, above, regarding the possible affect of site modifications (including regrading) on SS-107, also applies to the fifth bullet. SAPL concurs with the MEDEP's comment 6 (dated 5/31/02) that the table on page 9 is confusing; it should be revised.

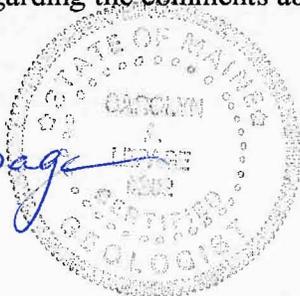
Page 3 of 3, M.Raymond
June 5, 2002
Preliminary DQOs for Former CDC

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: James Horrigan, SAPL
Iver McLeod, MEDEP
Meghan Cassidy, USEPA

105cdcDQOs.jn2