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LETTER REGARDING MAINE COMMENTS ON NAVY RESPONSES ON DRAFT
ENGINEERING ESTIMATE/COST ANALYSIS SITE 30 NSY PORTSMOUTH ME
9/26/2002
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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September 26, 2002

Mr. Fred Evans
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Responses to Comments on the Draft Engineering Evaluation/Cost Analysis (EE/CA), Site 30 (Building 184), Portsmouth Naval Shipyard, Kittery, Maine, August 23, 2002

Dear Fred:

The Maine Department of Environmental Protection has reviewed the Navy's responses referenced above. The center of our disagreement is the Navy's assumption that removing the pit fill material, brick lining, and standing water will remove 100% of the contaminant source. The MEDEP believes that while this is likely, it is not a certainty.

We believe that there is the possibility that acid in the pit could have migrated between the acid-proof brick to the underlying concrete substructure. In such a case the acid would likely have dissolved/degraded the concrete, potentially to the point where the acid could have contaminated the soil behind the concrete.

This soil could be a source of contamination to water that may migrate into the pit. If there are cracks/holes in the bottom of the pit this water may then flow back out of the pit into the soil and groundwater beneath the pit. Since we don't know the source of the water currently in the pit it is difficult to ascertain what may happen with groundwater following the removal action.

Therefore it will be very important to inspect the concrete substructure after the acid-proof brick has been removed. MEDEP will need to participate in this inspection. Details of this inspection can be discussed in the work plan for the removal action.

See comments below.

1. Navy Response to MEDEP General Comment 2

This comment addressed the issue of the Navy's proposal to drill a drain hole through the 8-inch subfloor underlying the acid pit to minimize the future accumulation of water in

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the former pit. The Navy has indicated that Alternative 3 "...removes the potential source of acid crystal growth and the source (pit fill material, brick lining, and any standing water) for potential future groundwater impact."

In a phone call between you and myself on September 26, 2002 we spoke about the Navy's intention regarding the drain hole. You indicated that the any drains in the pit would be connected to the sanitary sewer system. In addition, the Navy will investigate the present nature of the existing drain to determine its suitability to drain any pit water (details to be discussed in the removal work plan). Therefore, in general the MEDEP has no further concerns regarding potential contamination of groundwater via migration of water in the pit to the soil. However, as indicated above, it will be very important to examine the condition of the concrete substructure of the pit. If it appears that the concrete is "leaky" we will have to reassess this position. If the concrete is in poor or damaged condition it will be especially important to determine if soil behind/below the concrete is contaminated.

2. Navy response to MEDEP Comment 4

"Under Alternative 3, the source will be removed, so the action has to be effective. Therefore, monitoring would not be required."

This statement presupposes that we know that 100% of the source of the contamination is from the fill, water, and brick within the pit. As indicated above, while this is likely, it is not yet known whether or not any acid migrated between bricks into the underlying concrete and soil.

In addition it is simply good practice to follow up an action with short term monitoring to ensure that the action was effective. This is especially important with regard to the crystals. How will the Navy know whether or not the crystals reappear without some sort of short-term monitoring program? It is not prudent to indicate that "the source will be removed, so the action has to be effective" without verifying that this is so.

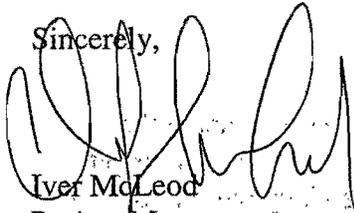
3. Navy response to MEDEP Comment 5

"Under Alternative 3 the Navy is assuming all material (crystals, acidic soil, and acid proof brick within the pit) is removed..."

As indicated above the MEDEP believes this assumption is premature without determining the condition of the concrete substructure.

Please feel free to contact me at (207) 287-8010 if you have any questions.

Sincerely,



Iver McLeod
Project Manager
Bureau of Remediation and Waste Management

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