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NSY PORTSMOUTH
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LETTER AND STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
RESPONSE TO U S NAVY COMMENTS TO DRAFT FEASIBILITY STUDY OPERABLE UNIT 4
(OU4) NSY PORTSMOUTH ME

5/18/2012

STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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May 18,2012

Linda Cole
NAVFAC MIDLANT
9742 Maryland Ave
Bldg Z-144, 1st Floor
Norfolk VA 23511-3095
Attn: Linda Cole

re: Responses to MEDEP Comments Dated September 20,2010, Draft Feasibility Study for
OU4, Portsmouth Naval Shipyard, Kittery, ME

Dear Linda,

The Maine Department of Environmental Protection has reviewed the Navy's responses
referenced above. We have the following comments.

General Comment

1. The Navy has informed MEDEP that the Shipyard will begin renovating Building 178 this year. As part of this renovation the Shipyard planned to remove sediment from the MS-12 area outside of the IR program. For the record, as we discussed during our May 15,2012 conference call the sediment removal must meet CERCLA standards. The Navy and regulators should meet to discuss exactly what procedures and documentation are required. It may be possible for the Navy to submit documentation that meets the intent of the CERCLA guidance without following the letter of the guidance.

2. Please use a red-line strikeout format to indicate text changes in the **Draft** Final FS.

Specific Comments

3. RTC 19. Our comment was poorly worded. We meant that the MNA remedy could only be considered effective if it met the RAO within some specific time frame. However, in contrast to our original comment, a time frame for meeting the RAO is more appropriate to include as a decision rule in the monitoring program, rather than in the RAO.

4. RTC 21. In Table 1-1 change the source of sediment depth data for MS-1 from "OU9 PI" to "OU9 RI".

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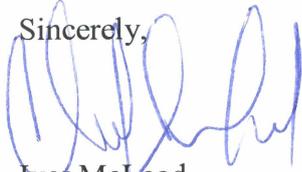
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5. RTC 34. The primary point of MEDEP's comment was that the Navy should consider the potential cost advantage of mechanical removal over monitored natural attenuation. This could be an informal "back of the envelope" comparison. If there appears to be a significant cost savings for a one-time removal versus potentially years of monitoring it may then be necessary to do a full evaluation of sediment removal.

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

pc:

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