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NSY PORTSMOUTH  
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U S NAVY RESPONSE TO THE MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION  
FOLLOW UP COMMENTS ON THE DRAFT TECHNICAL MEMORANUM PERFLUORINATED  
COMPUND USE ASSESSMENT AT PORTSMOUTH ME  
03/11/2015  
RESOLUTION CONSULTANTS

Response to Follow-Up Comments on the  
Draft Technical Memorandum: Perfluorinated Compound Use Assessment at  
Portsmouth Naval Shipyard, September 2014

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The following are responses to comments on the Draft Technical Memorandum on Perfluorinated Compound Use Assessment, Portsmouth Naval Shipyard received from the Maine Department of Environmental Protection on February 27, 2015.

1. Response to Comment 3. If any historic plans showing the drain lines leading from Building 79 to Berth 6 exist please include them in the memo.

*Response.* A request was made to the Public Works Department at PNSY for historic plans. If a historic drain plan showing the drains leading to Berth 6 is located it will be included in the revised memo.

2. Response to Comment 3. This response states that sediment in Berth 6 is being removed as part of the OU4 remedial action. This is incorrect. While sediment is being dredged from the area adjacent to Site 10, near Berth 6, no sediment is being removed from Berth 6 as part of the OU4 RA. Has Berth 6 been dredged since 1972 for other purposes? If not, there is a potential for PFCs to be present in the sediment at this location.

Based on the conceptual site model for PNSY any PFCs that may be present would not pose a risk to human health as sediment in that area is inaccessible. Benthic biotic may be exposed to PFCs in the sediment. However, there is very little information on the effects of PFCs on biota and therefore currently it is difficult to determine if they may pose a risk to the environment.

*Response.* In 1978 over 100,000 cubic yards of sediment was dredged from Berths 6, 11, and 13. Approximate dredge extents were shown on Figure 8-6 of the IAS (attached to Response to Comments), and this figure will be included in the memo. If PFOA and PFOS were discharged to the river during plating operations, which ceased in 1972, any PFOA or PFOS in Berth 6 sediment would have been largely removed through the dredging in 1978.

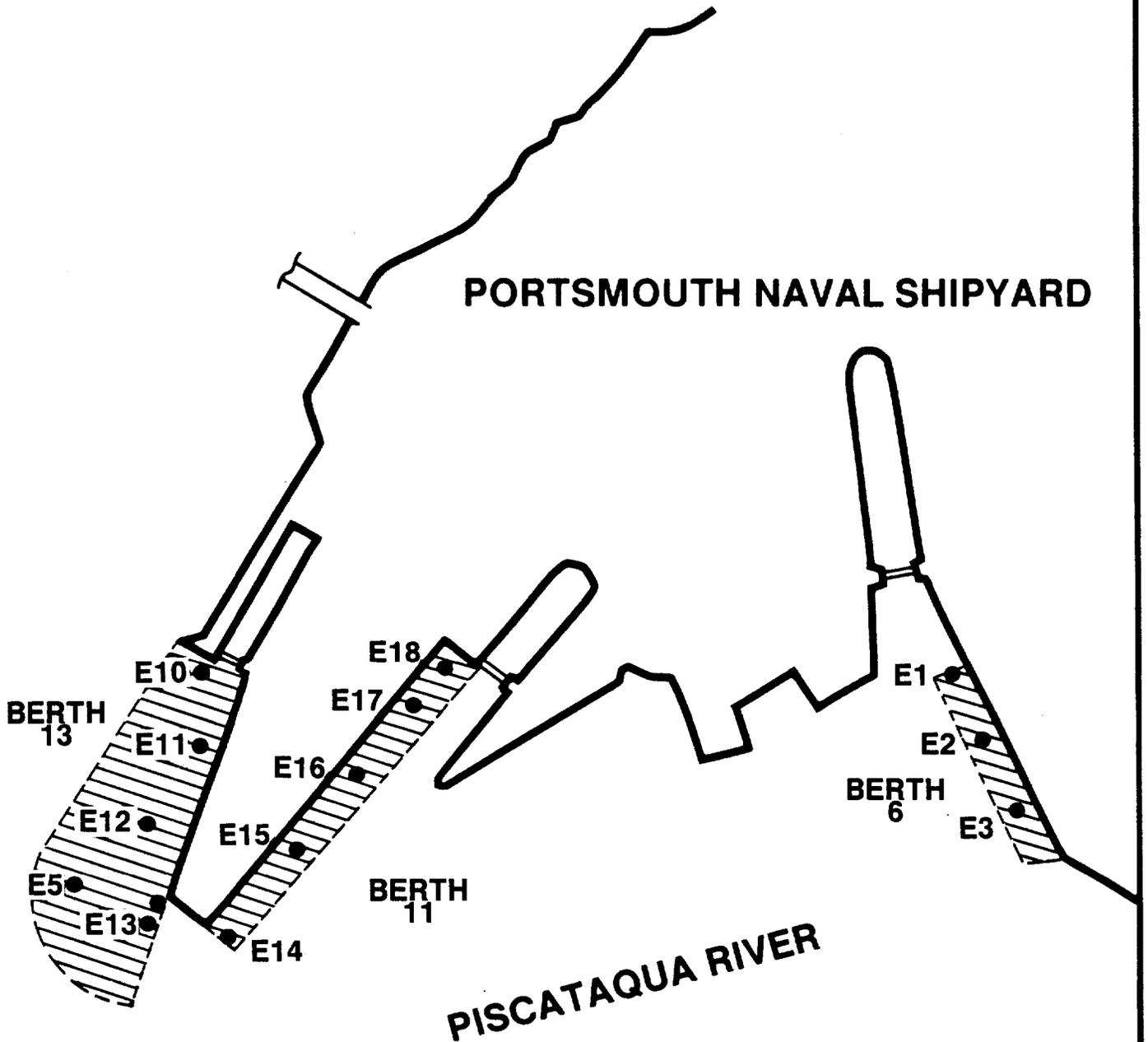
In response to comments from MEDEP dated December 15, 2014 and February 27, 2015, the following red-line, strikeout text is proposed for the Electroplating section in the revised memo.

~~PSONY-PNSY~~ has conducted electroplating operations, and it is possible that PFCs were used. A large electroplating area was operated within Building 79 from the 1940s until 1972, and chromium, cadmium, and lead electroplating were all performed. As reported in the Initial Assessment Study (IAS), ~~during operations at Building 79,~~ wastewater and spent baths ~~from plating operations at Building 79~~ were dumped into floor drains that discharged to the Piscataqua River near Berth 6 "from a review of sewerage plans" (Weston, 1983). Chrome, lead, and cadmium plating sludges were mixed in with normal refuse and were disposed of directly into the Jamaica Island Landfill (JILF) (Operable Unit 3), which is located at the eastern extent of PNSY as shown on Figure 1, between 1945 and 1972 (Weston, 1983). In 1978 over 100,000 cubic yards of sediment was dredged from Berths 6, 11, and 13. Approximate dredge extents were shown on Figure 8-6 of the IAS (see Attachment A). If PFOA or PFOS were discharged to the river during plating operations, which ceased in 1972, any PFOA or PFOS in Berth 6 sediments would have been largely removed through the dredging in 1978. Berth 6 was dredged in 1978, and ~~the~~ dredged materials were disposed of in the southern portion of the JILF. The exact locations of the disposal area within the JILF are unknown.

**E ● ENVIRONMENTAL SEDIMENT SAMPLE STATION**

**▨ PROPOSED DREDGE AREAS**

SOURCE: Candidate EIS, "Dredging Portsmouth Naval Shipyard," March 1978



**FIGURE 8-6**  
**LOCATIONS OF TEST BORINGS AT SITE 2,**  
**INDUSTRIAL WASTE OUTFALLS**



**INITIAL ASSESSMENT STUDY**  
**PORTSMOUTH NAVAL**  
**SHIPYARD**