

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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May 1, 2000

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

re: Draft Final Site Screening Report, Sites 30, 31, and 32 for Portsmouth Naval Shipyard, Kittery, Maine, March 2000

Dear Fred:

The Maine Department of Environmental Protection has reviewed the latest Navy Responses to Comments from Appendix H in the document referenced above. The Department's comments follow.

1. Comment 10

"Please refer to Navy's original response."

This response to our follow-up comment is unacceptable. The MEDEP reviewed the Navy's original response at the time that response was issued and presented an argument as to why we disagreed with the original response. We expect the Navy to address our argument, not just refer to the response we are arguing against.

Please respond to the following statement, especially our argument that if the in situ groundwater is nearly homogeneous (as the Navy stated), it is difficult to explain why the highest value is less reliable than the lower value:

"The State of Maine's risk assessment guidance indicates that both average and maximum concentrations should be evaluated for risk assessment purposes. The MEDEP believes that the highest concentration of a duplicate pair should be used for VOCs, in lieu of averaging as the Navy has done. If the in situ groundwater is nearly homogeneous, it is difficult to explain why the highest value is less reliable than the lower value. Conversely, several explanations can be advanced for a loss of concentration during handling and laboratory analysis."

The MEDEP notes, as the Navy stated, that the methodology used for evaluating duplicate pairs is consistent with EPA Region I guidance. However, the Navy should explain why they are not being consistent with the State of Maine's risk assessment

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guidance which indicates that both average and maximum concentrations should be evaluated for risk assessment purposes.

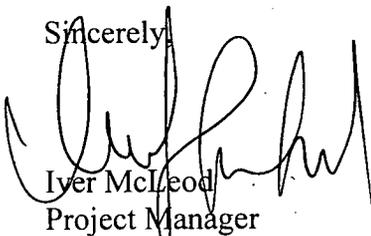
2. Comment 16

“The Navy is currently not planning any additional monitoring wells to the site at this time.”

Response noted. However, the MEDEP will insist on more wells in the remedial investigation phase if the proper water levels (or corrections to for tidal effects) are not collected and if these new data do not dispel our concerns on proper location of downgradient wells.

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

Sincerely,



Iyer McLeod
Project Manager

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