



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NSY PORTSMOUTH  
5090.3a

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June 3, 1999

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

re: MTADS Geophysical Survey of the Jamaica Island and Topeka Pier Landfills at the Portsmouth Naval Shipyard, Kittery, ME, 5-10 October 1998, Draft - 18 May, 1999

Dear Fred:

The Maine Department of Environmental Protection has reviewed the document referenced above. The Department's comments follow.

**General Comments**

- 1) This report is of high quality, and the graphics are exceptionally well presented and are clear.
- 2) The geophysical results show many potential buried metal targets for test-pitting consideration. It is difficult to specify a ceiling number of locations to investigate in advance of actually digging some of the locations. At a minimum, the Department is interested in two additional locations (T#33 and T#43), and hopes the Navy will include these. These additional targets are in the H-27 area of the JILA (Table B1), where only 6 test pits in an area of widely spread geophysical hits are now scheduled.
- 3) At the May 20 RAB, the Navy also indicated they would be test pitting within the area of the JILF that was inaccessible to the survey. This work is not listed in the draft MTADS report. Will details of this test pitting be provided in the final MTADS report or under separate cover?
- 4) No test pits are proposed for the Topeka Pier Survey Area. Admittedly, many utilities are present, both above ground and below ground. However, a few red anomalies appear on Figures C3 and C4 that apparently are not associated with known utilities. MEDEP encourages the Navy to select several of these to investigate. If no pits are dug, our knowledge of this area will have no chance of being enhanced.

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## Specific Comments

### 5) 5.0 Survey Results, p. 7

Please include the term “nT” in the acronym list.

### 6) Figures 7 and 9, Distribution of calculated object depths, p. 9, 11

Displaying the data in increments of 0.1 meters resolution gives a very busy appearance to the graphs. The need for increments of less than 0.25 meters is not apparent to us. Please consider reformatting this scale.

### 7) Table 2, Suggested Targets for Further Investigation, p. 13

a) This table identifies 25 suggested targets for further investigation out of over 300 targets identified in the survey. What is the rationale for choosing only 25 targets for test pitting?

b) The accuracy of the geophysical instruments and methodology is very impressive, especially when the applied algorithms furnish diameters and depths to hundredths of a meter. Please consider rounding these values to the nearest 0.1 meter. It matters little to the public and the excavation process to drop the hundredths, and in doing so the Naval Research Laboratory substantially reduces the risk of over-selling the capabilities of subsurface geophysics. These predictions will retain more creditability as these rather precise depths and diameters undoubtedly will not be verified in many instances.

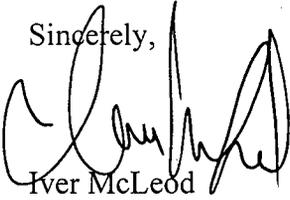
### 8) Appendix C

a) The GIS overlays on the Topeka Pier EM anomaly image maps (Figures C3 and C4) is confusing. For the most part, utilities don't seem to match with anomalies in the EM maps. In addition, the EM anomaly image maps don't seem to correspond with the maps presented in Figures C1 and C2 even though they are supposed to be the same maps. The utility maps seem to correspond better with Figures C1 and C2.

b) It is puzzling that X and Y coordinate scales are not shown, as is the case for all other image maps in this report. If this cannot be added, the distance scale should be changed to meters or feet, from miles.

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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