



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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November 22, 2002

Mr. Fred Evans  
Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mailstop 82  
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re: Additional MEDEP comments for the Site 32 Remedial Investigation Quality Assurance Project Plan for Portsmouth Naval Shipyard, Kittery, Maine, October 2002 and Site 32 Action Items, October 15, 2002.

Dear Fred:

The Maine Department of Environmental Protection submitted comments on the document referenced above in a letter dated November 18, 2002. As indicated in that letter we had not yet completed review of the document. Our review is complete and I have included the Department's additional comments below. I apologize for any inconvenience by submitting comments in two separate letters.

Please note: Comments 2 and 23 in my Nov. 18, 2002 comment letter quote the Navy as stating "...it is unlikely..." This is in error. The Navy's actual quote was "...it is likely:..." I apologize for any confusion this error may have caused.

### General Comment

The Department has reviewed the 1925 site-conditions map of the US Navy Yard, Portsmouth from the January 2000 Preliminary Assessment Former Prison Complex report prepared by Malcolm Pirnie (referenced by the Navy in the Oct. 11, 2002 'Site 32 Action Items' submission). The map delineates a bedrock high, called "ledge" approximately 450 due north of Buildings 129/158. The former point of land where a crematory was located in Figure 1-3 would suggest that this bedrock high likely is a submerged extension of the historical shoreline (circa 1880). We think that this might be important to future RI interpretations in that a buried northeast-trending bedrock ridge could effectively divide Site 32 into two migration basins: an eastern basin that contained the former Timber Basin and comprises most of the drainage area for Outfall OF63, and a western basin containing the large auto repair building, old Berth 16, and a second major drain system (OF60 and OF61) that discharges close to the pier. Data to be collected during the RI may reveal significant differences between these apparent basins.

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## Specific comments

### 1. Sampling Design and Rationale, p. 2-13 1st bullet

For reader cross-referencing, please add the following to the end of the statement: “(See Section 4.3.2 and Appendix G)”.

### 2. Monitoring Well Purging and Groundwater Sampling, p. 4-6 1st paragraph

For reader cross-referencing, please expand the end of the statement to read: “(See Section 2.6 and Appendix G)”.

## Appendix F - Comments on Navy's RTC to MEDEP's Comments of September 13, 2002

### 3. Specific Comment 2 (MEDEP's Comment 5)

The table that the Navy presents on page 7 gives Site 30 soil concentrations that are more than slightly elevated relative to other groundwater samples at Site 30, even though they are not much higher than the Navy's "Representative Facility Background Concentration". The Department has previously not accepted PNS background concentrations as a standard for comparison, and continues to do so. It should be noted that the maximum lead concentration in soil shown in the table (394 mg/kg) is essentially at the USEPA Region 9 Residential PRG of 400 mg/kg.

The occurrence of higher metal concentrations at Site 32 compared to Site 30 immediately upgradient does not necessarily mean that those metals have not migrated from Site 30 to Site 32. Each site likely contributes to the 'basin contaminant load' measured at Site 32. In going forward in the RI process, MEDEP cannot dismiss the potential for linkage between these two sites, and will be examining the combined data to support or refute a linkage.

### 4. Specific Comment 5 (MEDEP's Comment 20)

“The Navy will present a rationale for why PAHs are not likely human health risk drivers that need to be considered as part of an interim action for sediment... Please see the text in the draft final QAPP related to the sediment sampling for extent to support an interim action and for support of a human health risk assessment. (See Section 4.4).”

We cannot find the any such rationale in Section 4.4.

### 5. Specific Comment 8 (MEDEP's Comment 26)

Navy response in part: “Given the relatively low semi-volatile concentrations observed during the SSI, the Navy does not anticipate any issues associated with TICs. As such, TICs will not be analyzed for as part of this investigation.”

There is no reason to expect any correlation between the concentrations of TICs and other SVOCs. Regardless, the mass spectrometer does analyze for TICs along with the other SVOCs. The only extra work is for the analyst to interpret and report the data. Should there not be any issues with TICs as the Navy anticipates there should not be a great deal of extra effort on the part of the analyst. The MEDEP expects the Navy to report the SVOC TIC data.

### **Additional Groundwater Sampling Decision Process**

#### **6. Background, p. 1, fourth paragraph**

The use of “may” in these statements seems to indicate a significant degree of uncertainty in the cause and effect relationship being proposed. If this word cannot be eliminated, the premise will be perceived as questionable and/or weak.

The second sentence would be better written as “Whichever component has the largest variability is the one that will affect decision making the most.”

#### **7. Data Evaluation Process, p. 2, Step 6**

“If no COPC requires additional data, then the evaluation is complete and no further groundwater sampling will be conducted as part of the RI to support the risk assessment.”

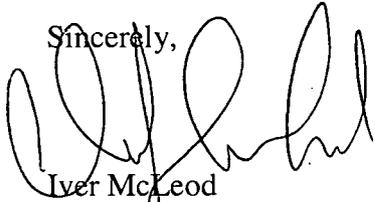
Is the Navy saying that if two sampling events in time do not show an exceedance of risk screening levels for an analyte, statistical evaluation will show the confidence level that this analyte does not exceed its screening level at times in between is 95%? Such a projection is not intuitive to us. Please elaborate.

#### **8. Data Evaluation Process, p. 3, Step 9 and 10**

Step 9 uses a sigma time value of greater than 2 times the sigma distance, and step 10 gives a sigma time value of less than 1 times the sigma distance as criteria that would initiate an additional round of sample collection. We are having difficulty in comparing these requirements to what is presented in the flow diagram on page 4. The flow diagram has greater than 2 times sigma (d) in both instances. Is this an error?

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

Sincerely,



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