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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

December 24, 2002

Mr. Frederick J. Evans, P.E.
Remedial Project Manager
Engineering Field Activity Northeast
10 Industrial Hwy., Mail Stop #82
Lester, PA 19113-2090

Re: Site 34 Draft Site Investigation Quality Project Plan Follow on Comments, Portsmouth Naval Shipyard, Kittery, Maine

Dear Mr. Evans:

Thank you for your responses to our comments to the Draft QAPP dated 25 November 2002, which were prepared on behalf of the Navy by Tetra Tech NUS. Upon review of the responses, the majority of EPA's comments are resolved, pending review of the described changes to be in the draft final QAPP. We have several follow-on comments or comments of record which are attached.

If you have any questions, please feel free to contact me at barry.michael@epa.gov or 617.918.1344 with copy to Matt Audet at audet.matthew@epa.gov.

Sincerely,

(signed)
Michael S. Barry
Federal Facilities Superfund Section

Attachments

cc. Matt Audet/EPA
Deb Cohen/Tetra Tech NUS
Carolyn Lepage/Lepage Environmental
Iver McLeod/ME DEP
Charles Porfert/EPA
Marty Raymond/PNS
Rick Sugatt/EPA
RAB Members

Attachment 1
US EPA Follow On Comments to Site 34 Draft Site Investigation QAPP
Portsmouth Naval Shipyard

Note: Several of EPA's comments are comments of record which relay EPA concern and/or denote issues to be resolved by higher authorities; in the meantime EPA concurs with the Navy's proposals for proceeding with the Site 34 Site Screening Investigation. Comment numbers are the same as in our letter of 10 October 2002.

1. **Tables 1-3, 2-1, and 5-1 to 5-9.** Comment addressed pending confirmation review of modified draft final QAPP.

2. **(Comment of Record) Appendix B, Page 16, second bullet** regarding basing the PRG upon individual chemical risk of 1E-05. EPA policy is that PRGs for individual chemicals should be derived based on 1E-06 cancer risk and HI =1, if the cumulative cancer risk of all COCs is higher than the acceptable risk range (1E-04 to 1E-06, HI =1) so that the cumulative risk of multiple chemicals of concern is likely to be within the acceptable risk range if PRGs are achieved. However, we can concur with the Navy's proposal to proceed for Site 34 and PNS pending resolution of this and other risk assessment issues with the Navy by higher level authorities.

3. **(Comment of Record) Appendix B, Page 19, Sediment Screening Level for Pesticides Bullet** regarding the use of ER-Ms in event there is no OU4 IRG for a contaminant. EPA believes ER-L's are most often appropriate if there is no IRG/PRG. However, we have reviewed the Navy's rationale for using ER-M's and concur with using them for the reasons cited at Site 34 for this Site Screening Investigation.

Comments 2-5 and 7-11 have been addressed pending confirmation review of modified draft final QAPP. Comment numbers are the same as in our letter of 10 October 2002.

1. Page 3-4, Planned Assessments. As in EPA comment to the Site 32 QAPP, it appears there is a semantic misunderstanding of "audit" vs "field review". The Navy's response that the FOL will ensure that the field SOPs are consistent with the QAPP is acceptable. In EPA's experience, field personnel often disregard the specific QAPP in favor of the general SOPs unless they are fully and frequently briefed beforehand on what is expected of them to obtain the required data quality. Thus we urge the Navy to ensure field personnel are briefed in addition to the FOL verifying the SOPs against the QAPP. As noted in the Navy's response, the EPA may also request permission for Quality Assurance or oversight contractor personnel to be present and observe during field work. It is likely that we will make a request for such a visit at a mutually agreed time.

6. (Comment for Record) Page 4-7, Section 4.6.1 Groundwater Purging and Page 4-8, Section 4.6.2 Temporary Monitoring Well Sampling. EPA believes that using peristaltic pumps for VOC samples on investigative phases is not usually appropriate because of the possible loss of VOCs from the ground water using a vacuum pump (as opposed to during long term monitoring where it is often acceptable to track overall contaminant conditions over time). However, EPA can concur to using a peristaltic pump in wells at Site 34 in the belief that an environmentally significant concentration of VOCs will be detected in any case. Our concurrence is based upon several site specific reasons:

-VOCs are not expected to be encountered due to the building use and history.

-Low level VOCs even if encountered are not expected to be a risk nor trigger regulatory action due to expected brackish groundwater and short pathway to river discharge.