



DEPARTMENT OF THE NAVY  
PORTSMOUTH NAVAL SHIPYARD  
PORTSMOUTH, N. H. 03804-5000

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NSY PORTSMOUTH  
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IN REPLY REFER TO:

October 26, 1998

MEMORANDUM

FOR THE MEMBERS OF THE RESTORATION ADVISORY BOARD (RAB) CERCLA REMEDIAL ACTION PROGRAM, PORTSMOUTH NAVAL SHIPYARD, KITTERY, MAINE

On behalf of the Seacoast Anti-Pollution League (SAPL), the Navy is forwarding SAPL's Review of Draft ARAR Table for Interim Record of Decision for Operable Unit 4 for your information. It was prepared for SAPL by their Technical Assistance Grant advisor, Lepage Environmental Services, Inc.

If you have any questions regarding these comments, they may be asked at a RAB meeting, by calling Lepage Environmental Services at (207) 777-1049 or by writing to:

Lepage Environmental Services  
P.O. Box 1195  
Auburn, ME 04211-1195

Sincerely,

*Ken*  
Ken Plaisted  
Navy Co-Chairman  
Restoration Advisory Board

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# Lepage Environmental Services, Inc.

P. O. Box 1195 • Auburn, Maine 04211-1195 • 207-777-1049 • Fax: 207-777-1370

October 19, 1998

Peter Vandermark  
Seacoast Anti-Pollution League  
P. O. Box 1136  
Portsmouth, New Hampshire 03802

Subject: Review of Draft ARAR Table for Interim Record of Decision for Operable Unit 4

Dear Mr. Vandermark:

As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the Draft ARAR Table for Interim Record of Decision for Operable Unit 4. ARARs are federal or state environmental standards, requirements, or criteria that may be considered 'Applicable or Relevant and Appropriate Requirements' (hence ARARs) for a remedial action. Our comments are as follows:

1. The ARAR table should be subdivided to tabulate chemical-specific, location-specific, and action-specific ARARs separately.
2. We understand the Maine Department of Environmental Protection will be commenting on adding ARARs relating to the classification of estuarine waters, the 1987 State rule regarding sampling and biological analysis, and the special licensing requirements for sampling juvenile lobsters. We concur with these additions to the ARAR table.
3. The State of Maine Fish and Shellfish Consumption Advisories (see enclosed copy) should also be added to the ARARs table.

If you have any questions regarding the comments above, please give me a call at 207-777-1049.

Sincerely,



Carolyn A. Lepage, C.G.  
President



Enc:

Iver McLeod, Department of Environmental Protection  
Meghan Cassidy, Environmental Protection Agency  
Marty Raymond, Portsmouth Naval Shipyard

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## MAINE DEPARTMENT OF HUMAN SERVICES - BUREAU OF HEALTH

### 1. What is this handout about?

- Maine fish are good for you, and good to eat. However, like most states, Maine has some consumption advisories.
- Updated fish consumption advisories are being issued for 1997 by the Maine Bureau of Health. As new data on the amounts of toxic chemicals in fish become available the Bureau of Health reassesses advisories to include the most up-to-date information.

### 2. What is new in 1997?

- Consumption advisories due to mercury contamination were first issued in 1994, and applied to consumption of fish from all lakes and ponds. This year, mercury advisories are being modified in two ways. First, separate consumption advisories are being issued for warm water (bass, pickerel, perch, sunfish, crappie) and cold water (trout, salmon, smelt, cusk) fish species (details are listed on the flip side of this handout). Second, consumption advisories are being expanded to include all inland surface waters of the state, including rivers and streams.
- New data on levels of PCBs (suspected cancer causing chemicals) in fish caught in specific waters are prompting the issuance of new and expanded advisories on striped bass, bluefish and certain Maine rivers (details listed on reverse).
- Sampling results show that dioxin levels in fish have declined substantially since the mid-1980s. Some rivers still have levels of dioxin that have prompted fish consumption advisories. In addition, new data on coplanar PCBs must be calculated with dioxin in issuing advisories. Coplanar PCBs are found both above and below industrial discharges on some of Maine's rivers. The exact source of these chemicals is not known (see PCBs below).

### 3. Some Background:

#### • Why do we care about mercury, where does it come from?

Mercury causes toxic effects on the nervous system. The unborn child and young children are more susceptible than adults due to their developing nervous systems. Toxic effects of mercury depend on the amount to which you are exposed. Some fish caught in Maine have been found to have levels of mercury that may be harmful to health. Mercury occurs naturally in the environment at low levels. Mercury levels are increased in the environment when mercury is released into the air from coal fired power plants, municipal/medical waste incinerators, and other industrial facilities. There are currently 34 states with mercury advisories.

#### • Why do we care about PCBs, where do they come from?

PCBs have been shown to cause cancer in laboratory animals and may cause cancer in humans. PCBs were once widely used in electrical transformers. Because these chemicals were used extensively, accidental leaks and spills were likely to occur, and disposal of consumer electronic products into landfills would cause PCBs to be released into the environment. Municipal waste incinerators are also suspected sources of PCBs. There are currently 31 states and the District of Columbia with fish consumption advisories for PCBs.

#### • How are advisories issued?

The Maine Department of Environmental Protection (DEP) collects and monitors fish for toxic pollutants throughout the State. The Surface Water Ambient Toxic Monitoring Program (SWAT) allows the DEP to perform these studies. Data are given to the Bureau of Health for consideration of possible health effects if certain amounts of fish are consumed. The advisories are updated as the Bureau of Health receives and assesses the new data and the Maine Departments of Environmental Protection, Inland Fisheries and Wildlife and Marine Resources have been consulted.

#### • For more information:

For information concerning the Surface Water Ambient Toxic Monitoring Program call the Maine Department of Environmental Protection, Office of Land and Water Quality at 287-3901. For information concerning fish consumption advisories contact the Maine Department of Human Services, Bureau of Health at 287-6455.

## Maine 1997 Fish Consumption Advisories

### Maine Department of Human Services - Bureau of Health

#### General Consumption Advisory for ALL Inland Surface Waters Due to Mercury Contamination

- ☛ *Pregnant women, nursing mothers, women who may become pregnant, and children less than 8 years old, should NOT EAT warm water fish species (bass, pickerel, perch, sunfish, crappie) caught in any of Maine's inland surface waters; Consumption of cold waters species (trout, salmon, smelt, cusk) should be limited to 1 meal per month. The consumption of older cold water fish (e.g., a large lake trout) should be avoided.*
- ☛ *All other individuals should limit consumption of warm water species caught in any of Maine's inland surface waters to 2 to 3 meals per month. People who eat large (older) fish are advised to use the lower limit of 2 meals per month. There is no consumption limits for cold water species.*

#### Specific Freshwater Fish Consumption Advisories

In addition to the general statewide advisory due to mercury contamination of fish, other chemicals (PCBs and dioxins) in fish caught in specific waters of the state have been found at levels sufficient to prompt consumption advisories for these waters. The consumption advisories listed below are more restrictive than the statewide mercury advisory for the general population, and may be more stringent than the statewide advisory intended to protect the developing fetus, infant and young child.

ADVISORY AREA		MAXIMUM CONSUMPTION LEVEL [All Species]	CHEMICALS OF CONCERN
Water Body	SEGMENT		
All Waters	Statewide	SEE DESCRIPTION ABOVE	mercury
Androscoggin River	Gilead to Merrymeeting Bay	6 meals per year	PCBs & dioxins
Kennebec River	Madison to Edwards Dam (Augusta)	1 to 2 meals per month*	PCBs & dioxins
	Edwards Dam (Augusta) to The Chops (Bath)	NO CONSUMPTION (freshwater fish only)	PCBs & dioxins
Penobscot River	Below Lincoln	1 to 2 meals per month*	PCBs & dioxins
Salmon Falls River	Below Berwick	6 meals per year	PCBs & dioxins
East Br. Sebasticook R.	Below Corinna	1 meal per month	PCBs & dioxins
West Br. Sebasticook R.	Below Hartland	2 meals per month	PCBs & dioxins
Little Madawaska River and all tributaries	Madawaska Dam to Grimes Mill Road	NO CONSUMPTION	PCBs
Green Pond, Chapman Pit, Greenlaw Brook	All Waters (on former Loring Air Force Base)	NO CONSUMPTION	PCBs
Red Brook	All Waters (Scarborough)	6 meals per year	PCBs

\* People who eat large (older) fish are advised to use the lower consumption level, as older fish tend to accumulate PCBs, dioxins, and mercury.

#### Marine Fish and Shellfish Consumption Advisories

**Lobster Tomalley:** *Pregnant women, nursing mothers, and women who may become pregnant should NOT EAT tomalley (the green substance found in the body of the lobster). All others should limit consumption of lobster tomalley to 1 meal per month. A tomalley meal is eating the tomalley from one lobster.*

**Striped Bass:** *Pregnant women, nursing mothers, women who may become pregnant, and children less than 8 years old, are advised to limit consumption of striped bass to 1 meal per month. All others should limit consumption to 2 to 3 meals per month, with the lower limit applying to those consuming large striped bass.*

**Bluefish:** Consumption of bluefish should be limited to one fish meal per month.