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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 1  
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BOSTON, MASSACHUSETTS 02114-2023

May 29, 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: Preliminary Data Quality Objectives for  
Former CDC  
Portsmouth Naval Shipyard  
Kittery, Maine

Dear Mr. Evans:

The United States Environmental Protection Agency (EPA) has reviewed the Preliminary Data Quality Objectives (DQOs) for the Former CDC at the Portsmouth Naval Shipyard in Kittery, Maine. The information reviewed is dated April 26, 2002.

EPA's comments are provided in Attachment I to this letter.

Should you have any questions regarding this matter, please contact me at (617)918-1387.

Sincerely,

Meghan F. Cassidy  
Remedial Project Manager

Enclosure

cc: Marty Raymond/PNS  
Iver McLeod/ME DEP  
Carolyn Lepage/Lepage Environmental  
Deb Cohen/Tetra Tech NUS  
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## ATTACHMENT I

The following are EPA's comments on the Preliminary Data Quality Objectives (DQOs) for the Former CDC at the Portsmouth Naval Shipyard in Kittery, Maine. The information reviewed is dated April 26, 2002.

This document designs a sampling approach and decision criteria to determine the extent of a lead hot spot of that contained 35,000 mg/kg in one location but less than 100 mg/kg in most other locations (0-1 foot surface soil composites). The average concentration excluding the hotspot was 90 mg/kg. A phased sampling program is proposed in which samples will be collected from 0-0.5 ft bgs, 0.5 to 1 ft bgs, and 1-2 ft bgs at distances of 10 ft and 20 ft from the hot spot location. Samples will be analyzed in phases starting with the nearest and shallowest samples. After each phase a new area-weighted average exposure point concentration for the whole site will be calculated to determine whether the risk is acceptable. If risk is unacceptable, analysis of additional samples will be conducted in phases to determine the horizontal and vertical extent of lead at concentrations greater than 375 mg/kg.

The approach seems to be reasonable but EPA has the following comments.

1. Although the proposed procedure is generally acceptable, EPA reserves the option to re-evaluate the need for removal of any discrete bounded hotspot area greater than 400 mg/kg. This concentration is a policy-based PRG that may be implemented on an average basis or a not-to-exceed basis, depending on the likely exposure scenario and risk management considerations.
2. The procedure for calculating area-weighted averages should be described in detail and reviewed and approved by EPA before implementation.
3. The information provided indicates that since the original sampling effort, the site has been regraded. Therefore, it is possible that the SS-107 "hot-spot" may be deeper than it was when originally sampled. Information about the regrading should be reviewed, if available, before the decision is made regarding the appropriate sample depth.