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NSY PORTSMOUTH
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DEPARTMENT OF THE NAVY

ENGINEERING FIELD ACTIVITY, NORTHEAST
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY

MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO

5090
Code EV23/FE
July 25, 2002

Ms. Meghan Cassidy
U.S. Environmental Protection Agency, Region I
1 Congress Street
Suite 1100
Mail Code HBT
Boston, MA 02114-2023

Mr. Iver McLeod
Maine Department of Environmental Protection
State House Station 17
Augusta, ME 04333-0017

Dear Ms. Cassidy/Mr. McLeod:

SUBJECT: REMEDIAL DESIGN ANALYSIS REPORT FOR OPERABLE UNIT 3;
INSTALLATION RESTORATION PROGRAM FOR PORTSMOUTH NAVAL
SHIPYARD, KITTERY, ME

Enclosed are the Navy's responses to SAPL comments dated May 20, 2002 on the Remedial Design Analysis Report for Operable Unit 3. The Navy's Draft Final Design will be submitted for review and comment on August 8, 2002.

If additional information is required please contact Mr. Fred Evans at (610) 595-0567 x159.

Sincerely,

FREDERICK J. EVANS
Remedial Project Manager
By Direction of the
Commanding Officer

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July 25, 2002

Copy to:

USEPA (M. Barry)
MEDEP (D. Hallowell)
National Marine Fisheries Service (J. Catena)
COMSUBGRU TWO (A. Stackpole) (w/out encl.)
NOAA (K. Finkelstein)
US Fish & Wildlife Service (K. Munney)
ME Dept. of Marine Resources (Don Card)
NH Fish & Game (C. McBane)
PNS (Code 106.3R, M. Raymond)
ROICC (G. Wallace)
PNS Code 100PAO (w/out encl.)
Foster Wheeler Environmental Corp. (C. Tippmann)
TtNUS, Inc. (D. Cohen)
Mr. Doug Bogen
Mr. Peter Britz
Mr. Jeff Clifford
Mr. Alan Davis
Ms. Michelle Dionne
Mr. James Horrigan
Ms. Carolyn Lepage
Ms. Mary Marshall
Mr. Phil McCarthy
Ms. Diana McNabb
Mr. Jack McKenna
Mr. Onil Roy
Dr. Roger Wells

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July 25, 2002

**RESPONSES TO SAPL COMMENTS DATED MAY 20, 2002
REMEDIAL DESIGN ANALYSIS REPORT, OPERABLE UNIT 3
PORTSMOUTH NAVAL SHIPYARD**

COMMENTS BY LEPAGE ENVIRONMENTAL SERVICES, INC. DATED MAY 20, 2002

1. **Title Blocks.** The title blocks at the top of the first pages of the responses should clearly state that Lepage's and Summit's comments are on behalf of the Seacoast Anti-Pollution League.

Response: Future title blocks will be indicate comments are on behalf of SAPL as requested.

2. **Stormwater Management and Erosion Control.** Lepage's Comment Number 2, dated 2/14/02, expressed SAPL's concern regarding the (in-)adequacy of the stormwater management plan. The Navy's response states that the stormwater pollution plan will be included in the Draft Final submittal. SAPL may have additional comments once that document becomes available for review.

Response: Comment noted.

3. **Sea Level Rise.** SAPL appreciates the Navy's consideration of previous comments on the potential for sea level rise to affect the remedial action. The Navy's response states that while regulations require consideration of the 100-year storm, the shoreline revetment design was evaluated against the 500-year storm to account for sea level rise. What is the difference between the 100-year and 500-year storms with regard to the parameters use to evaluate the design?

Response: The 100 year flood elevation is 105.2 feet and the 500-year flood elevation is 105.9 ft, both PNS Datum. While we did not completely evaluate the 500-year storm, the reefs and islands that limit the fetch of the 100-year winds to less than 2 miles would have the same effect on the 500-year storm, with the result that waves would not be significantly larger, and the wave-runup elevation might be about 1-foot higher than the 100-year event. If needed in the future, 1-foot of height can be added to the shoreline protection along Clark Cove.

4. **Aesthetic Issues.** At the March 21, 2002 Restoration Advisory Board (RAB) meeting, the public representatives brought up the issue of what the final landfill cover would look like to

people viewing the site from Kittery. Of particular concern is that the landfill will look like a big mound with a parking lot on it. What are the Navy's plans to address these concerns?

Response: Trees will be planted along Parker Avenue to provide screening.

5. **Effect of Gas System.** Another issue brought up at the March 21st RAB meeting was the effect of bringing fresh air into the landfill via the gas system. Would the influx of fresh air begin a new oxidation process that would produce new toxic pollutants, defeating the purpose of the cap. How will the Navy ensure that does not happen?

Response: The cap and landfill gas system will not introduce oxygen to areas of the landfill which are not already above the water table and therefore already in the presence of oxygen.

COMMENTS BY SUMMIT ENVIRONMENTAL CONSULTANTS, INC. DATED MAY 8, 2002

Section 2.3.1.3.1

Comment 1: We questioned if alternative materials had been considered for drain layer construction (e.g. tire sheds). The AOC focused their response on granular materials. Summit does not consider granular materials an "alternative material". In fact, arguments for the use geosynthetic materials such as less weight, lower cost, shorter installation time, better quality control, etc., may also apply to a material such as tire shreds.

Response: Alternative materials like the one suggested are made up of particles, and would behave similar to granular materials. Although these materials may be lighter than aggregate materials, quality control is more difficult to control, given the unknown sources that recycled materials come from. These materials are not under consideration for use.

Section 2.3.1.7

Comment 3: AOC should clarify the last sentence of their response that states "Vents can be spaced so they are located on the playing fields themselves, but at high points".

Response: Vents may be on the playing fields but not inside the field of play, for example a vent may be located behind the backstop.

Section 2.6.6.1

Comment 7: We continue to have concerns relative to sediment and erosion control during construction. AOC indicated that a temporary sedimentation basin(s) would not be constructed. This approach does not appear consistent with the Maine Erosion and Sediment Control Handbook for Construction. The response indicated that Foster-Wheeler Environmental Corporation (FWENC) would develop a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP needs to be consistent with the Storm Water Management Plan and the Soil Erosion and Sediment Control Plan developed for the project.

Response: All possible erosion control measures are not possible with the constraints of a

landfill and limited space at JILF. The storm water and erosion control plan will be submitted by Foster Wheeler Environmental with the Draft Final Remedial Design Workplan.

General

Comment: Please verify that the Seacoast Anti-Pollution League (SAPL) will have an opportunity to review and comment on the Operations and Maintenance Plan and the Long-Term Monitoring Plan for the facility.

Response: The Operations & Maintenance, and Long Term Monitoring Plans will be submitted to regulators and RAB for review and comment.