

**Christian, Anna-Marie**

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**From:** McLeod, Iver J [Iver.J.McLeod@Maine.gov]  
**Sent:** Thursday, May 20, 2010 1:47 PM  
**To:** Cole, Linda L CIV NAVFAC MidAtlantic  
**Cc:** Wolfe, Theodore E; Lipfert, Gail E; audet.matthew@epa.gov; Cohen, Deborah; Thyng, Frederick M CIV NAVFAC, PTNH  
**Subject:** Draft Final OU1 PRAP, Portsmouth Naval Shipyard

Linda,

MEDEP has only one comment on the DF PRAP for OU1 so instead of sending a formal comment letter I thought we could just clear it up by email/phone. In our January 12, 2009 comment on the Draft PRAP we indicated in Comment 5 that there appeared to be a discrepancy in some of the text in the Summary of Site Risks. The Navy's response was that one sentence referred to antimony and another to lead (see below). The Navy indicated that you would clear up the confusion by separating the text into bulleted items.

However, the revised text is still confusing since nowhere in this section does it say anything about antimony vs. lead. I think this could be cleared up by just adding what you wrote in the response: "The noncancer risk estimates indicated that adverse noncarcinogenic health effects are possible for the hypothetical future residential scenario for a child exposed to antimony in soil within the crawl space under Building 238" and "Exposure to lead in soil under Building 238 is unacceptable for all current and future receptors."

Let me know if you have any questions about this.

Thanks,

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**MEDEP Comment, 1/12/09:** Summary of Site Risks, p. 9: "Noncancer risk estimates indicated that adverse noncarcinogenic health effects are possible only for the hypothetical future residential scenario for a child exposed to soils within the crawl space under Building 238...Risks under future potential site conditions were unacceptable for exposure to lead in soil under Building 238 for occupational workers, recreational users, and residential users..."

The first sentence indicates that only children under a potential future residential scenario are at risk from soils under Building 238, while the second sentence indicates that occupational workers, recreational users, and residential users are at risk under potential future site conditions. Please clarify this discrepancy.

**Navy Response, 5/3/10:** The referenced text under Summary of Site Risks is discussing noncancer risk estimates (based on the hazard index). The noncancer risk estimates indicated that adverse noncarcinogenic health effects are possible for the hypothetical future residential scenario for a child exposed to antimony in soil within the crawl space under Building 238. The next sentence is discussing risks for exposure to lead in soil. Exposure to lead in soil under Building 238 is unacceptable for all current and future receptors. Exposure to lead in soil outside Building 238 is unacceptable for the future hypothetical residential user. For clarity, bullets will be added to separate each of the risk conclusions so that the cancer, noncancer, and lead exposure risk conclusions are provided in separate bullets.