



DEPARTMENT OF THE NAVY  
NORTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
PHILADELPHIA, PENNSYLVANIA 19112-5094

N00102.AR.000049  
NSY PORTSMOUTH  
5090.3a

5090 IN REPLY REFER TO  
Ser 1203/1423/LR

28 March 1991

Mr. David Webster  
Chief ME, NH & VT Waste Regulation Section  
Region I  
J.F. Kennedy Building  
Waste Management Section  
Boston, MA 02203-2211

Re: PORTSMOUTH NAVAL SHIPYARD RCRA FACILITY INVESTIGATION  
PROPOSAL APPROVAL WITH CONDITIONS

Dear Mr. Webster:

As agreed to in our 28 February 1991 response to EPA's conditions, we have enclosed our response to the remaining seven conditions.

Based upon discussions with EPA Region I on 19 March 1991 and EPA's letter of 21 March 1991, we respond as follows:

Section 1: Condition #8 - Prepare plans for the collection of air monitoring and SWMU specific meteorological data at SWMU 8 (JILF) sufficient to meet the objectives of the RFI.

The Navy has prepared the attached Air Monitoring Proposal. As a result of our 19 March 1991 meeting, EPA requested that Respirable Suspended Particulate (RSP) data be used if available instead of Total Suspended Particulate (TSP) data. This change has been incorporated into the proposal.

EPA also stated that site specific data over ambient air monitoring data for the region was preferred for the Risk Assessment. The Navy will only use ambient air monitoring data for the region if it is in close proximity to the shipyard, otherwise site specific data will be collected.

The temporary meteorological tower will be erected.

Section 4: Condition #8 - Revise Section 4.0 to specify that soil samples for the full range of chemical and physical parameters listed in the RFI Proposal will be collected below the water table in each boring as well as above the water table.

Although the Navy believes that collection and analysis of soil samples below the water table is not warranted at this time in the RFI and may be more appropriate at the Corrective Measures Study, the Navy will comply with EPA's revised condition of 21 March 1991.

Re: PORTSMOUTH NAVAL SHIPYARD RCRA FACILITY INVESTIGATION  
PROPOSAL APPROVAL WITH CONDITIONS

Section 8: Condition #6: - Revise Section 8.0 to provide for sampling of all areas of sediment occurrence within the area shown on Attachment A.

In response to the condition, the Navy previously submitted the sediment sampling proposal. Section 8 of the revised RFIP will include this proposal. In addition, the Navy has requested the Naval Ocean Systems Center, Marine Environmental Support Office (NOSC) to develop a more extensive off shore program. The Navy will present this program to EPA Region I within the next month. However, EPA Region I was informed that this more extensive program will require an extension beyond the July 1992 due date of the RFI Report.

Section 9: Condition #1: - Identify where and how soil samples and sediment for SWMU 26 will be collected and how many soil and sediment samples will be collected.

This condition was responded to in our 28 February 1991 submission. Mr. Waterman has informed me that our submission is acceptable with the exception that MEDEP must concur. Pamela Parker of MEDEP was contacted on March 27, 1991 and concurs with this approach.

Section 9: Condition #4: - Remove the sentence on p. 9-3 which reads "During the excavation ... in a scheme acceptable to DEP and EPA .... sampling of soil will be performed," and replace with the sentences "A scheme for the excavation and removal of underground storage tank SWMUs shall be developed and submitted to EPA and ME DEP. During excavation soil sampling will be conducted." or draft new sentences which convey the equivalent information.

This condition was responded to in our 28 February 1991 submission. Mr. Waterman has informed me that our submission is acceptable with the exception that MEDEP must concur. Pamela Parker of MEDEP was contacted on March 27, 1991 and concurs with this approach.

Section 11: Condition # 1, 2: - The attached QAPP has been revised to reflect all EPA Region I conditions.

In addition to the seven conditions listed above, Mr. Waterman also requested clarification on the following:

Section 4: Condition #14: - The EPA requested removal of the sentence "Because the spatial distribution of the six continuously sampled borings includes both upgradient and downgradient perimeters of the JILF, the borings will be

Re: PORTSMOUTH NAVAL SHIPYARD RCRA FACILITY INVESTIGATION  
PROPOSAL APPROVAL WITH CONDITIONS

indicative of both SWMU related and non-SWMU related conditions." The Navy will remove the sentence from the RFI Proposal.

Section 5: Condition #8: - The EPA requested a correction technique for tidal measurements related to slug testing. The correction technique is provided as an attachment.

Section 6: Condition #4 - The EPA indicated that the Navy went beyond the requirements of the original condition and requested that the Navy reword the addendum. The addendum response is reworded as follows: If contamination is found in groundwater above the confining layer, a bedrock well may be necessary to determine potential contamination within the bedrock. This bedrock well location will be chosen to minimize the risk of vertical cross contamination.

Section 7: Condition #1 - The QAPP has been revised to reflect this condition.

Section 15: Condition #4 - The EPA requested minor word changes on page 73 and 76 of the addendum. These changes have been incorporated and the pages are provided.

As a result of our 4 March 1991 TRC Meeting at Portsmouth, the EPA also requested the Navy to revise the RFI Proposal to reflect the conditions. The Navy agreed to revise the proposal in lieu of the addendum format which originally was proposed. We expect to award this contract task to our consultant by mid May. Therefore, a revised RFI Proposal will be submitted to EPA Region I by August 5, 1991.

If you have any questions, please contact me at (215) 897-6432.

Sincerely,



LINDA RESTA

Remedial Project Manager

By direction of the Commanding Officer

Copy To:  
ME DEP (P. Parker)  
PNS (Codes 410.5)

w/o Enclosures:  
PNS (Code 400, 410)  
McLaren, Hart (S. Urschel)

**Re: PORTSMOUTH NAVAL SHIPYARD RCRA FACILITY INVESTIGATION  
PROPOSAL**

**Internal Copy To:**

**14**

**1423/LR**

**1422/JS**