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NSY PORTSMOUTH
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DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO

5090
Ser 2569/1823/JMC

AUG 09 1995

MEMORANDUM

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

We have been reviewing copies of the interview records from the 1983 Initial Assessment Study (IAS) for Portsmouth Naval Shipyard (PNS). Several discrepancies have been noted between these interview records and the IAS report. These records were sought in preparation of the RFI Data Gap Workplan in an attempt to determine appropriate safety precautions for intrusive investigations within the Jamaica Island Landfill (JILF). At that time (1993) we could not find the interview sheets during a search of our records, including asking Roy F. Weston, Inc. the consultant on the project. However, Weston recently found copies of the interview sheets and sent them to us. The discrepancies are discussed in the enclosed comments.

Please review these comments and if you have any questions please call the Public Affairs Office at (207) 438-1140 or by write to:

Portsmouth Naval Shipyard
Code 121.10 Bldg 44
Attn Fran Endyke
Portsmouth, NH 03804-5000

We appreciate your time and effort in reviewing this information.

Sincerely,

JAMES M. CONROY, PE
LT, CEC, USN
Remedial Project Manager
By direction of the
Commanding Officer

Encl: IAS Review Comments

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**COMMENTS ON INITIAL ASSESSMENT
PORTSMOUTH NAVAL SHIPYARD
KITTEERY, MAINE**

1. Section 7.3, pg 7-4, Initial Assessment Study, states that no incinerators are in use at the Shipyard. The copies of the interview sheets speculate that there may have been an incinerator used by the prison for solid wastes. Also there are indications of an incinerator in Bldg 46 which was used for destruction of classified paper material. We will have the PNS Historian look in to the historical use of incinerators including construction, period of usage, what types of materials were burned and how was the ash disposed of. Also of concern is the "Tepee" incinerator near Building 298 which has been included as a study area.

2. The interview sheets indicate that PCB's may have been mixed with waste oils in the past. Section 7.1.6, pg 7-4 of the IAS: Waste oils consist of cooling and cutting oils, motor oils, transmission oils and hydraulic oils. There is no mention of the possibility of mixing in PCB contaminated oil. Also there is mention in the interview sheets that prior to installation of the SWMU #11 tanks, oil was spread on ground or roads for dust control.

3. Apparently all railroad tank cars used for the collection of used solvents/waste oil and transport to Jamaica Island Landfill were cleaned at the end of the railroad tracks behind Building 154. Residual oil and detergent/water mix were dumped directly onto the ground from 1959 on. There was no mention of this type of activity in the Initial Assessment Study or RCRA Facility Assessment report. This area is within the study area designated as the Topeka Pier site.

4. The records state that 100 - 200 gas cylinders (including acetylene) with valves removed were buried at Jamaica Island Landfill after the Korean War. Table 8-1, pg 8-5, (IAS) a table depicting what hazardous materials were disposed of at Jamaica Island Landfill shows 100 - 200 cylinders (chlorine and acetylene gas) were buried full. This contradicts the statements.

5. Bldg 79 is mentioned as having six plating tanks containing chrome, silver, brass, copper, cadmium and lead. These solutions & wastewater for these processes were dumped into floor drains and ultimately into the river. The RCRA Facilities Assessment only mentioned the chromium contaminated wastewater being dumped into the floor drains.

6. There is mention of a temporary storage area for paints, acids and other types of liquid waste, located at the Plate Yard (Area 157). This area was not identified in the IAS or RFA.

7. There is mention of a paint dump located adjacent to the Wastewater Treatment Plant (WWTP), used as temporary staging area prior to disposal. This area is within the study area for the incinerator site.

8. There is reference to a letter from Public Works to the EPA that states that there are approximately ___ capsules at each mercury burial site. It is difficult to read the number of capsules on the interview sheets but it is believed to be 514. This does not match what is stated in the IAS and RFA. This also does not correspond to what was found at MBI.

9. Prior to 1954 an old battery plant was located in Building 18. The IAS states that Building 18 was a Paint Shop. Also there are indications that leakage from the battery acid piping occurred under Bldg 238.