



DEPARTMENT OF THE NAVY
PORTSMOUTH NAVAL SHIPYARD
PORTSMOUTH, N. H. 03804-5000

IN REPLY REFER TO:

November 9, 1999

MEMORANDUM

FOR THE MEMBERS OF THE RESTORATION ADVISORY BOARD CERCLA REMEDIAL
ACTION PROGRAM, PORTSMOUTH NAVAL SHIPYARD, KITTERY, MAINE

Enclosed please find the draft minutes from the September 23, 1999, Restoration Advisory Board meeting for your review and comment. Comments are requested by November 30, 1999. You may provide your comments to me at 207-438-3830.

Sincerely,

A handwritten signature in cursive script that reads "Marty Raymond".

Ken Plaisted
Navy Co-Chairman
Restoration Advisory Board

Distribution:

Doug Bogen
Jeff Clifford
Michele Dionne
Eileen Foley
Carolyn Lepage
Mary Marshall
Phil McCarthy
Jack McKenna
Mary Menconi
Onil Roy
Roger Wells
Johanna Lyons
EPA (M. Cassidy)
NOAA (K. Finkelstein)
MEDMR (D. Card)
USFWS (K. Munney)
NHF&G (C. McBane)
MEDEP (I. McLeod)
NORTHDIV (F. Evans)
COMSUBGRU TWO (R. Jones)
Tetra tech NUS (L. Klink, D. Cohen)
PNS (Codes 106, 106.3, 106.3R, 100PAO, 105, 105.5, NRRO)

**RESTORATION ADVISORY BOARD MEETING
PORTSMOUTH NAVAL SHIPYARD
DAYS INN, KITTERY, MAINE
SEPTEMBER 23, 1999**

The meeting began at 7:10 p.m. and ended at 9:00 p.m. Community members attending were: Doug Bogen, Phil McCarthy, Jeff Clifford, Onil Roy, Mary Mericoni, and Roger Wells; Johanna Lyons from Seacoast Anti-Pollution League(SAPL), regulatory members Meghan Cassidy (EPA) and Denise Messier (MEDEP); and Navy members Ken Plaisted and Fred Evans. Others attending were Carolyn Lepage, on League's (SAPL) technical advisor; Marty Raymond, Alan Robinson, and Tom DeVaney from the Shipyard. Among the guests were Larry Favinger (a reporter for the Portsmouth Herald), Linda Klink from Tetra Tech NUS, Kristen Wandland from ENSR, and Steve Haberman from SAPL. Community members Jack McKenna, Eileen Foley, and Mary Marshall were absent.

INTRODUCTION

Ken Plaisted, the Navy co-chair welcomed the RAB and introduced the primary topics of the evening; the Defense Utilization and Marketing Office (DRMO) slope stabilization, and a review of the Feasibility Study (FS) process. Also, he announced Johanna Lyons will be replacing Peter Vandermark as SAPL's representative on the RAB; Ken thanked Peter for his service.

STATUS OF WORK

Fred Evans provided a handout summarizing the work status. The Navy noted that the Seep/Sediment Report is due out shortly. Other recent activities by the Navy have focused on the exchange of comments with MEDEP and EPA on recently submitted reports.

REGULATOR UPDATES

EPA --- Meghan Cassidy told the RAB that EPA had recently submitted comments in two letters, dated September 14 and September 21, 1999 on the proposed DRMO slope stabilization. EPA's Biological Technical Assistance Group (BTAG) reviewed the Interim Offshore Monitoring Plan for Operable Unit (OU) 4 and provided comments in two letters dated August 20 and September 1, 1999. In a letter dated August 20, 1999, the EPA officially requested that the Navy sign the final Federal Facility Agreement (FFA), and Meghan noted that the EPA will sign once the Navy does, at which time the FFA and Site Management Plan will be available for public comment.

EPA also submitted comments on the Navy's Response to Comment letters for the Sites 10 & 29 Draft Field Investigation Report, and the Sites 30, 31, and 32 Draft Site Screening Report. She also noted that EPA has no further comments on the Revised OU3 (Jamaica Island Landfill (JILF)) Risk Assessment. Meghan agreed that EPA is willing to present the FFA and Site Management Plan to the RAB at the November meeting.

MEDEP --- Denise Messier was attending the RAB meeting for Iver McLeod. She expressed MEDEP's concern with lead contamination at the DRMO, and gave the RAB a handout which summarized CERCLA-related documents received and/or reviewed by MEDEP since the last RAB meeting (06/24/99). Documents recently reviewed by MEDEP include:

- DQOs for Interim Offshore Monitoring Program for OU4: Comments submitted June 28;
- Draft Interim Offshore Monitoring Plan, Comment Response Letter: Comments submitted June 28;
- Draft On-Shore/Off-Shore Contaminant Fate and Transport Modeling Phase II Report, Comment Response Letter: Comments submitted July 1;
- Proposal for the Evaluation of Seep/Sediment Data Collected Between December 1996 and November 1997: Comments submitted July 26;
- Sampling and Analytical Standard Operating Procedures for the Interim Offshore Monitoring Plan for Operable Unit 4 for Rounds 1 and 2: Comments submitted August 9; and
- Draft Final Interim Offshore Monitoring Plan for Operable Unit 4 for Portsmouth Naval Shipyard: Comments submitted August 20 and September 8.

DRMO SLOPE STABILIZATION

As an introduction to the presentation, Ken Plaisted of the Shipyard stated the Navy takes full responsibility for the erosion. He explained that the 1993 interim cap objective was to minimize human and ecological exposure at the DRMO. The cap was therefore built horizontally, with no consideration given to vertical reinforcement. The history of the DRMO slope stabilization to date has been as follows: EPA and MEDEP were informed; the Navy sampled the soil from the slope; corrective action funding was obtained; the Navy met with their remediation contractor (Foster-Wheeler) to design a plan; a letter with sampling results and plan drawings of the slope stabilization were presented to the RAB and regulators; the DRMO was treated with hydromulch to deter further erosion; and the Draft Slope Stabilization Work Plan was issued. Foster-Wheeler is scheduled to begin slope stabilization during the first week of October 1999. The JILF and Topeka Pier were also treated with hydromulch, since erosion, albeit minimal, was noticed by the Navy during an inspection of the shoreline.

Fred Evans the Navy's project manager presented the status and plans for the slope stabilization at the DRMO. The DRMO consists of approximately 2 acres of mostly filled land. It has been in operation for over 40 years, and typical materials stored on site included lead and nickel-cadmium battery elements, motors, typewriters, paper products, and scrap metal. A Final Confirmation Study was conducted in 1984, and a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) was conducted from 1989-1992. Interim corrective measures, based on the RFI findings, were to minimize human and environmental exposure to the chemicals in soil, primarily lead. The work conducted to meet these measures included asphalt paving on the western portion of the site adjacent to existing pavement, and a geocomposite liner overlain with a gravel-embedded concrete cap on the eastern portion of the DRMO. A curb was installed along the shoreline to prevent overland "sheet" runoff from stormwater. The vertical retaining wall along the shoreline of the DRMO consists of concrete blocks. Soils may erode from

under, over, and between these blocks which, it was noted, have been decomposing with continued exposure to the salt water and strong currents.

Since noticing the erosion, the slope has been stabilized with hydromulch, a wood pulp and grass seed mixture. Drawings for a multi-layer erosion control system have been prepared. The proposed control system includes bank run gravel, two layers (woven and non-woven) of geotextile, and three layers of stone; 6 inches of 1½ inch stone, 12 inches of 4-6 inch rock, and a top layer of 18-24 inch rock. Other actions the Navy is currently undertaking include an expedited lead analysis of Interim offshore monitoring samples at Monitoring Stations 10 (at Sullivan's Point), 11 (by DRMO, Site 29), and 12 (offshore of Site 10). These results will be compared to previous sampling results from 1991 and 1993, and the comparison will be available at the end of October. As noted by Ken Plaisted, the shoreline at the JILF from the boat landing to beyond the landfill and the whole length of Topeka Pier have also been hydromulched as a preventative measure.

The Navy will establish inspection plans for the DRMO interim cap and stabilized slope, as well as the shoreline at all other Installation Restoration sites to inspection for future erosion problems. The Navy will also prepare a DRMO Action Memorandum and Removal Action Report.

Concerns raised by the RAB included the status of the adjacent Teepee Incinerator Site (Site 29) retaining wall. The Navy noted that the retaining wall was designed to hold vertically and is comprised of reinforced concrete. It was recently inspected and is sound. The long-term stability of the hydromulch at JILF and Topeka Pier was raised as a concern. The Navy responded it will discuss more permanent solutions with the EPA and the MEDEP, but that the hydromulch should hold in the interim. Questions were raised by the RAB regarding the Shipyard's stormwater management plan. A plan is in place, and 10 of 65 outfalls are tested during rain events. The plan does not, however, address slopes. The Navy will develop an inspection plan for the shorelines of the IR sites.

Concerns were raised by the RAB regarding the allocation of funds for the DRMO slope stabilization system. The Navy indicated the construction will cost approximately \$380,000, and the funding was allocated from other programs at the Navy's Northern Division. Therefore, this may or may not impact the Portsmouth Naval Shipyard's budget. If it does, the Navy noted that they will try not to impact OU3 funding, since the site is close to decision.

The RAB had several concerns regarding the design and construction of the stabilization wall. The Navy noted that they will discuss with Foster-Wheeler the re-use of embankment rock, the design slope, and the actions taken to reduce soil and sediment erosion during construction. Concerns were raised by the RAB and SAPL regarding the amount of contamination that may have entered the river during the erosion. The Navy noted that it is impossible to know how much lead from contaminated soil was eroded, or where the lead may have gone. The Navy is currently concentrating on prevention of additional erosion.

The RAB asked for the comparative lead sampling results to be expedited. The Navy said that once the data are available, it would be fast turn-around for the comparison

table. Therefore, the Navy prefers to submit the results and comparison table as one package.

FEASIBILITY STUDY PROCESS

Linda Klink of Tetra Tech NUS presented an overview of the Feasibility Study (FS) process for the RAB's reference. The FS for OU3 will be distributed to the RAB and discussed at the next meeting.

The FS is part of the CERCLA process. During the FS, various remedial alternatives are scrutinized using nine evaluation criteria as defined in the National Contingency Plan (NCP). The FS provides a basis for identifying a preferred remedial alternative and supports the selection of a final Remedial Action. During the FS, Remedial Objectives are developed, Technologies are identified and screened, and Alternatives are identified and screened. The Alternatives are then evaluated using the nine NCP criteria, as a basis for later identifying a "Preferred Alternative" during the Proposed Plan.

The nine criteria are broken down into three main groups: two Threshold Criteria, five Balancing Criteria, and two Modifying Criteria. Each criterion is explained below:

Threshold Criteria

- Overall protection of human health and the environment. This criterion describes how the alternative, as a whole, achieves and maintains the protection of human and environmental health.
- Compliance with Applicable or Relevant and Appropriate Requirements (ARARs). This criterion judges the alternative in terms of how well it complies with regulations, or if a waiver is required, how this waiver is justified.

Balancing Criteria

- Long-term Effectiveness and Permanence. This criterion assesses how well and how long the human health and environment will be protected following completion of the alternative.
- Reduction of Toxicity, Mobility, and Volume. This criterion assesses the alternative in terms of the anticipated performance of the specific treatment technologies used.
- Short-term Effectiveness. This criterion assesses how well human health and the environment are protected during the construction and implementation of the remedy.
- Implementability. This criterion assesses the alternative in terms of its technical and administrative feasibility, as well as the availability of goods and services.
- Cost. The alternative is assessed using this criterion with respect to its present-worth capital, and operation and maintenance costs.

Modifying Criteria

- State Acceptance. Technical and administrative issues and concerns are judged from a regulatory point of view using this criterion.
- Community Acceptance. This criterion assesses the alternative based on comments received during the formal public comment period. The preferred alternative may be

modified or another selected as more appropriate based on the outcome of public comments.

FUTURE MEETINGS

The next RAB meeting is scheduled for **November 18, 1999** at the Courtyard Marriott in Portsmouth, NH. The topics for the November 18, 1999 meeting are as follows:

- The OU3 Feasibility Study
- The Federal Facility Agreement
- Update on the DRMO Slope Stabilization.

The RAB was asked if they had additional topics they wished to discuss, and was silent.