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NSY PORTSMOUTH
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LETTER REGARDING PROPOSED HAZARDOUS WASTE STORAGE FACILITY AT NSY
PORTSMOUTH ME
4/11/1994
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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April 11, 1994

Mr. Kenneth Plaisted
Director, Environmental
Environmental Affairs Office
Portsmouth Naval Shipyard
Portsmouth, N.H. 03804-5000

Dear Ken:

Both Joan Jones of the Department's RCRA Hazardous Waste Licensing Program and I met last week to discuss the Navy's proposed Hazardous Waste Storage Facility at Portsmouth Naval Shipyard. At issue is the proximity of the proposed new facility to SWMU #11. SWMU #11 is located under the concrete rolloff pad in the support area at the existing facility. This rolloff area is also used as a licensed storage and transfer area for solid and special wastes.

It is misleading to portray SWMU #11 as merely the location of two removed 7500 gallon "waste oil tanks". The wastes disposed of in these tanks reportedly include degreasers, lubricating oil, and waste fuel oils and possibly include other unknown hazardous wastes. When the tanks were removed in 1989, Department staff observed gross soil contamination in every direction of the excavation. Soil removed from the excavation during the tank removals was stockpiled on-site. The stockpiled soil was sampled and designated as hazardous waste. As part of the tank removal, approximately 370 cubic yards of contaminated soil was hauled off-site in March 1990. To date, the extent of soil contamination at SWMU #11 has not been defined or fully characterized. No remediation other than the tank removals in 1989 have occurred at SWMU #11.

Soil sample analyses taken by Department staff from the sidewalls of the excavation after the tank removals showed extremely elevated levels of metals, particularly lead. The soil samples contained a series of hydrocarbons C12-C22, which resemble either weathered #1 or #2 fuel oil at an approximate concentration of 1,900,000 ppb. The groundwater sample results show elevated levels of freon and other volatiles.

Freon was detected in monitoring wells JW-16B and JW-16 in several rounds of groundwater sampling conducted during the RCRA Facility Investigation. Freon was detected in monitoring well JW-16B at concentrations of approximately 970 ppb and 46 ppb and in monitoring well JW-16 at concentrations of approximately 2,500 ppb, 3,700 ppb, and 62,000 ppb. In response to Department comments about the possible source of the freon at SWMU #11, the Navy responded that freon still bottoms generated at Shop X-99 may have been disposed at SWMU #11. Number 4 fuel oil and number 6 fuel oil were also detected in monitoring well JW-16, at 5.3 ppm and 14 ppm respectively.

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Haliburton NUS, the Navy's contractor for the RCRA Corrective Action Program, will be conducting additional investigations at SWMU #11 this field season to determine the nature and extent of potential plumes of volatile and semi-volatile organic compounds detected in the vicinity of SWMU #11. The Department recommends that soil and groundwater samples should also be analyzed for metals, PCB's, and pesticides.

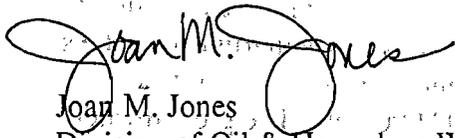
There is documented evidence of groundwater and soil contamination at SWMU #11. The extent of contamination at SWMU #11 must be defined prior to licensing the proposed new facility. The contamination must also be fully characterized. At a minimum, the Department recommends that test-pits be dug in the location of the proposed new facility and soil samples be collected for analysis around the existing facility to confirm that there is no contamination in that area. It may be possible and necessary to remove hot spots prior to construction of the new Hazardous Waste Storage Facility.

It would not be reasonable to move forward with the licensing of the proposed Hazardous Waste Storage Facility, in light of the unknown contamination at SWMU #11 and the proximity of SWMU #11 to the proposed facility. It is not known if SWMU #11 has contaminated the area under the proposed facility. The Department recommends that the Navy meet with us to discuss this problem. The purpose of this meeting should be to explore an expedited plan of action to investigate and further characterize SWMU #11.

Sincerely,



Nancy Beardsley
Division of Federal Facilities Remediation
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