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NSY PORTSMOUTH  
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LETTER REGARDING SUMMARY OF CONFERENCE CALL FROM 14 DECEMBER 1995  
NSY PORTSMOUTH ME  
12/28/1995  
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE

# DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.  
GOVERNOR

December 28, 1995

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

RE: December 14, 1995 Conference Call Summation

Dear Ken:

As follow-up to our conference call held on December 14, 1995, the Maine Department of Environmental Protection (MEDEP) would like to summarize some of the major points that came out of the call. The MEDEP staff participating in the call were Richard Heath, Joan Jones, Peter Blanchard and Nancy Beardsley.

First, it is essential that the MEDEP be informed when the Navy encounters any "waste" while performing construction or other activities at the base. Because Portsmouth Naval Shipyard (PNS) has been designated a Superfund site, any newly discovered "waste" sites or other newly identified contamination areas may be very important to the Superfund clean-up of PNS. While it may be customary for construction and environmental investigations to proceed along separate paths, it may not be the most productive approach. PNS is a very small, congested site and normal construction activities may very likely interfere with past areas of contamination.

Specifically, when subsurface work is conducted within, or adjacent to, known areas of contamination, such as SWMU #11 or SWMU #8, and waste is encountered, MEDEP should be called immediately and given the opportunity to sample the soil or waste in-situ. It is not acceptable to be informed by the Navy after-the-fact. This situation occurred during the excavation for the scales trench during the week of December 4, 1995. "Waste", including deteriorated drums, cable, wood, paint cans, brushes, etc., was removed from the trench and stored in rolloffs. The Navy conducted sampling for disposal purposes only on the stored waste. MEDEP was called after the waste had been removed, stockpiled, and sampled. The discovery of waste in this area could have important implications for the remediation at SWMUs #8 and #11, yet it appears that the Navy viewed the waste as a construction problem only.

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MEDEP was not given the opportunity to sample this material in-situ, and the Navy sampled the excavated material for limited parameters and solely for disposal purposes. Had MEDEP been given timely notification, we would have sampled for a full suite of contaminants. Sampling conducted in test pits located in the trench area by DEP staff on December 5, 1995, indicates a potential contamination problem exists there. The analytical results of the sampling event are attached for your review. Please forward to MEDEP a copy of the Navy's sampling results from the December 5, 1995 sampling event when they are available.

Second, it is important that the location, sampling procedures, analytical methods, analytical results, photographs, etc. of this new "waste" site be forwarded to MEDEP, EPA, and Northern Division, so that this new information can be incorporated into the Superfund database.

Third, it is important that Shipyard construction personnel be kept fully informed of environmental activities or concerns on-going at the base. Specifically, the construction of the scales and the proposed construction of the detention pond are located within, or very close to, areas of known contamination. It makes good sense to view any subsurface construction project with an eye toward identifying contamination problems that may otherwise have to be separately or individually investigated as part of the Superfund clean-up.

Fourth, the MEDEP supports the Navy's plan to relocate the proposed detention pond and would like to be involved in the relocation discussions. The Navy should submit to the MEDEP a set of revised plans for the detention pond as soon as they are available, so that we can be prepared for construction during the 1996 field season.

Within the MEDEP, the RCRA licensing unit and the Federal Facilities unit have closely coordinated on this project. However, it may be helpful to clarify that questions relating to the licensing of the Hazardous Waste Storage Facility should be addressed to Joan Jones. Questions relating to the closure of the existing (old) Hazardous Waste Storage Facility should be addressed to Peter Blanchard. Questions relating to past disposal areas or Installation Restoration issues should be addressed to Nancy Beardsley. Because the old and the new Hazardous Waste Storage Facilities are located within, or adjacent to, past disposal areas, any work performed in this area requires the attention of both units. If you should ever have any question as to who at the MEDEP should be involved in a situation, please ask any of us, and we will provide some guidance.

The MEDEP appreciates your forthrightness and expects full cooperation should the Navy encounter any environmental situations that may require MEDEP involvement. The MEDEP will strive to continue a positive and pro-active approach in working with

the Navy to solve the environmental problems at PNS. Please call us if you have any questions about any construction activity and its potential impact on on-going environmental investigations.

Sincerely,

*Nancy Beardsley*

Nancy Beardsley  
Federal Facilities Remediation Unit  
Bureau of Hazardous Materials and Solid Waste Control

pc: Mark Hyland, MEDEP  
Joan Jones, MEDEP  
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