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NSY PORTSMOUTH
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LETTER REPLY TO U S NAVY LETTER DATED 5 JANUARY 1996 REGARDING CLOSURE
OF BUILDINGS 298 AND 238 NSY PORTSMOUTH ME
2/6/1996
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

JILLIVAN
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February 6, 1996

Mr. Kenneth W. Plaisted, Code 121
Portsmouth Naval Shipyard
Public Works Department
Portsmouth, New Hampshire 03904

Re: Hazardous Waste Treatment Facility Closure, Ser 120/295

Dear Mr. Plaisted:

This letter responds to the Navy correspondence dated 5 January 1996 in regards to the closure of Buildings 298 and 238. The Department views the proposed changes as minor, and no formal modification of the approved closure plan will be required. Specific responses correspond to the items identified by the Navy. Additional clarification of the issues raised was provided during a conference call February 5, 1996.

1. The Department agrees that wiping surfaces dry after decontamination procedures have been completed is unnecessary. Air drying will avoid the generation and management of waste rags. The decontamination procedures of washing, scrubbing, and rinsing the affected equipment should ensure that residues are removed completely.
2. The Department agrees that the waste acid supply pipe from Building 95/96 may be abandoned 5 feet from the north corner of Building 298 for the purposes of closure of the Industrial Waste water Treatment Facility. Further investigations are needed to determine the best method of handling the pipe remaining in the ground. What is the schedule proposed by the Navy to investigate this pipe?
3. The Department agrees that Foster Wheeler may provide analytical services to assist in waste characterization and disposal in support of the facility closure. Foster Wheeler would be used in lieu of the Shipyard Materials Testing Laboratory. The Department understands that methods, sampling frequencies, quality assurance and quality control measures remain unchanged from the approved plan.

Serving Maine People & Protecting Their Environment

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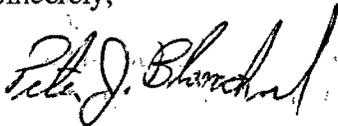
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4. The Department agrees based upon the recommendation of C.T. Male and Foster Wheeler that it is appropriate to demolish and remove the brick linings of the process tanks. The concrete walls of the tank will then be inspected for cracks and staining. Decontamination of the inner surfaces will be conducted in accordance with the approved procedures. The most prominent cracks will be cored to ascertain whether discharges have occurred. Additional decontamination procedures may need to be employed as driven by the results of the coring. The possibility remains for the brick linings to remain and be decontaminated as originally proposed. The Navy will advise the Department of any further revisions as decontamination procedures progress.
5. The treatment facility operators sent one of the tank trailers to the Defense Reutilization and Marketing Office. The trailer was decontaminated in accordance with the approved plan and will be certified closed as part of the facility closure certification. The treatment facility operators understand that the closure of the treatment facility is being conducted under approved procedures coordinated through the Environmental Affairs Office, including notification procedures prior to closure. The treatment facility operators will not conduct any additional closure procedures without coordination with the Environmental Affairs Office and the certifying independent professional engineer.

During our conference call, Liz Rovers of C.T. Male requested information concerning the requirements for disposal of uncontaminated demolition debris from the concrete tank structures. The issue raised was whether the waste would be regulated as a solid waste e.g. landfill, or allowed to be disposed of off site as inert fill. I have been advised the waste concrete may be able to be managed as an inert fill, however, specific approval is needed from the DEP Portland Regional Office. Please contact Barbara Schwendtner at (207) 822-6300 for details in the event that waste concrete is proposed to be disposed of as inert fill. Please contact me with any questions or comments you may have in regards to this letter.

Sincerely,



Peter J. Blanchard
Bureau of Hazardous Materials & Solid Waste Control
Division of Oil & Hazardous Waste Facilities Regulation

p.c. Barb Schwendtner, Portland Regional Office