



DEPARTMENT OF THE NAVY
NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
PHILADELPHIA, PENNSYLVANIA 19112-5094

IN REPLY REFER TO.

1422/JS
5 February 1991

Mr. Ernest Waterman
U. S. Environmental Protection Agency
Region I
Waste Management Section
J. F. Kennedy Federal Building
Boston, Massachusetts 02203-2211

RE: Meeting between U.S. EPA and The U.S. NAVY concerning approval with conditions of the RCRA Facility Investigation (RFI) Proposal for Portsmouth Naval Shipyard.

Dear Mr. Waterman

In order to avoid any confusion which may have arisen from our January 29th meeting, the Navy has a list of items discussed (enclosure 1). This list is not a substitution for the meeting minutes, to be provided at a later date, but to help clarify and keep the RFI moving forward as expeditiously as possible.

Several conditions were clarified and the Navy has agreed to implement these conditions. However, some conditions require additional discussion. A follow-up meeting has been scheduled for 11 February 1991 at EPA Region I to address those outstanding conditions.

If EPA takes exception to any of the listed resolutions please contact me as soon as possible. I can be reached at (215) 897-6432.

Sincerely,

A handwritten signature in cursive script that reads "Linda Resta".

LINDA RESTA
Remedial Project Manager

Copy To:
Portsmouth (Code 410.5)
ME DEP (Pam Parker)
McLaren, Hart, Inc. (S. Urschel)

Meeting between U.S. EPA and The U.S. NAVY concerning
approval with conditions of the RCRA Facility Investigation
(RFI) Proposal for Portsmouth Naval Shipyard.

Final Copy:

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2/18

Item	Resolution
(p.9, #1)	EPA agreed that some of the physical parameters may not be necessary and agreed to modify the list. A response will be provided by EPA.
(p.9, #4)	Visual inspection is not the exclusive technique in selecting samples. The sentence will be reworded to clarify how samples are being selected.
(p.9, #5)	The Navy does not agree with EPA that an 11.7 eV lamp should be used in lieu of the 10.2 eV lamp. The Navy will again discuss this issue with the manufacturer. It was suggested the both lamps be used.
(p.10, #7)	More discussion is required.
(p.10, #8)	The Navy disagrees with EPA's rationale to sample the soils below the water table. The EPA agreed to discuss this issue further with the Navy.
(p.10, #9)	The Navy agreed to revise Section 4.1 and collect an Appendix IX surface soil sample in the DRMO. EPA agreed to further discussion regarding sample location.
(p.10, #10)	Section 4.1 will be revised to obtain additional surface soil samples at the DRMO. The physical parameter list was left unresolved. EPA agreed to further discussion regarding the number of samples and the locations.
(p.11, #12)	This condition has already been satisfied. The Navy's ongoing field work at SWMU 27 has included borings to refusal and test pits to bedrock which satisfies EPA's request for borings. The proposed sampling is sufficient unless the Petroleum ID, shows inconclusive evidence concerning the presence of #6 fuel oil, and shows the possibility of BTEX present at SWMU #27.
(p.13, #2)	Tide gauges will be used in the next phase of work.
(p.15, #2)	The Navy is performing a site specific geologic study of PNS. However, the Navy believes that a fracture trace study using low altitude aerial photographs will not provide any new information. EPA agreed to reconsider the use of a new fracture trace study.

Item

Resolution

- (p.16, #4) The work plan will be modified to indicate that if the need arises a well may have to be placed through the confining layer.
- (p.16, #6) The difficulty in determining the background well locations was discussed. EPA stated that they are looking for baseline water quality in the area and background of reference wells are needed for establishing the Media Protection Standards. EPA stated the proposal should allow for establishing background levels.
- (p.18, #14) The Work Plan will be revised to clarify the rationale for the number of wells at SWMU 8. Also, consideration will be given to the placement of a well east of JW-14.
- *(p.19, #19) The sentence on pg. 6-15 will be revised. However, the use of chalked steel tape will be allowed by EPA, and no revision of the sentence on p. 6-15 is necessary.
- (p.19, #21) The work plan will be revised to indicate where the bailers are stored and what practices will be taken to insure the bailers remain clean and unexposed to contaminants.
- (p.21, #2) Because of the lack of information available on the clay cap design, quantitative analysis on the effects of the clay cap can not be performed. Additional discussion is required.
- (p.22, #1) EPA feels that grain size is required. EPA will evaluate past samples to determine if they have to be resampled for grain size. The Navy believes Atterburg limits are not applicable. This was not resolved and further discussion is required regarding the parameters.
- (p.22, #3b) The Navy disagrees with EPA that all storm water drains need to be sampled. The Navy will propose a plan to sample storm water drains affected by any SWMU runoff.
- (p.22, #4) The words "oxygenated layer" will replace "0-4".
- (p.23, #5) To be discussed at the future Biota meeting.
- (p.23, #6) To be discussed at the future Biota meeting.

Item	R solution
(p.25, #3)	The Work Plan should indicate that unless there is adequate historical information, Appendix IX sampling is the default parameter. The Navy disagrees with performing Appendix IX samples on the tanks contents. This issue was not resolved and requires further discussion.
(p.27, #7)	The Navy believes tightness testing on the tanks proposed for removal is not feasible. This issue was not resolved and will be discussed further.
(p.28, #1)	To be discussed at the future Biota meeting.
(p.29, #2)	On January 31 1991, EPA Ernest Waterman recommended contacting Debra Szaro regarding modified analytical methods.
(p.29, #3)	Table 3-1 of the QAPP has already been revised to include precision, accuracy and completeness data.
(p.30, #11)	A footnote clarifying the correct holding time will be added to Table 7-2.

*EPA to provide modified conditions statement