



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

IN REPLY REFER TO

1423/LR  
7 February 1991

Mr. David Webster  
Chief ME, NH & VT Waste Regulation Section  
Region I  
J.F. Kennedy Building  
Waste Management Section  
Boston, MA 02203-2211

Re: PORTSMOUTH NAVAL SHIPYARD RCRA FACILITY INVESTIGATION  
PROPOSAL

Dear Mr. Webster:

This letter is to acknowledge receipt of your 15 January 1991 Approval With Conditions of the RFI Proposal submitted 9 November 1991. The Navy has elected to revise portions of the RFI Proposal and submit those as an addendum to the RFI Proposal. We also acknowledge that the HSWA Permit requires delivery of the RFI Report, Public Health and Environmental Risk Evaluation, and Media Protection Standards by 16 July 1992. Attached is an updated schedule to reflect this approval with conditions.

I want to insure the record is complete regarding several observations in your letter of 15 January 1991:

1. You mention your concern that after lengthy interaction, EPA's comments are still not adequately addressed. You failed to mention that EPA did not have a dedicated Project Manager assigned to the Portsmouth Naval Shipyard from early April 1991 through August 1, 1991. It is very difficult to make progress on a project without a consistent group of participants. It should be understood that with the addition of a new Project Manager, new ideas and comments did originate.
2. While developing the RFI Proposal, the Navy accepted the risk in proceeding with fieldwork in November 1989 without EPA approval. To date we have completed approximately sixty percent of the fieldwork identified in the RFI Proposal. Our goal in proceeding has been to compensate for time lost in the RFI Proposal review process. We think this was a valuable decision in that a significant portion of the fieldwork on-shore has been performed.
3. Our submittals to date have been the result of the Navy's, and our consultant's, best technical judgement. We have incorporated our understanding of EPA's comments and agreements reached in discussions with the various staff assigned from your office.

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4. Our Initial Assessment Study and the RFI Proposal both acknowledge releases to the river from the Industrial Waste Outfalls. In addition, the Navy has acknowledged the potential for releases at the Jamaica Island Landfill and the DRMO Storage Yard.

As you know, we met on 29 January 1991 to discuss EPA's approval with conditions and have scheduled a follow-up meeting for 11 February 1991. The Navy is committed to corrective action at the Portsmouth Naval Shipyard and will continue to work together with EPA and the State of Maine to achieve this common goal.

Sincerely,



LINDA RESTA  
Remedial Project Manager

Copy To:  
ME DEP (P. Parker)  
NAVSHIPYD PORTS (Code 410.5)

Re: PORTSMOUTH NAVAL SHIPYARD RCRA FACILITY INVESTIGATION  
PROPOSAL

Internal Copy To:

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1422/JS

# **HSWA CORRECTIVE ACTION SCHEDULE**

## **Portsmouth Naval Shipyard**

- \* 10 April 1989** **HSWA PERMIT EFFECTIVE**
  
- \* 16 January 1991** **RFI Proposal Approved w/ Conditions**
  
- \* 16 July 1992** **RFI Report w/ PHERE & MPS**  
**-Review & Approval by EPA**
  
- \* (October 1992)** **Establish Media Protection Standards**
  
- \* (November 1992)** **CMS Proposal**  
**-Review & Approval by EPA**
  
- \* (March 1993)** **CMS Report**  
**- EPA Review & Approval**  
**- Modify Permit**  
**- Public Comment Period**  
**- Public Hearing**
  
- \* (November 1993)** **Corrective Measures Design**
  
- \* (May 1994)** **Corrective Measures Begin**

**(Tentative Dates based on 2 Month EPA Review)**