



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

February 26, 1991

Captain Thomas M. Hagge, CEC, USN  
Public Works Officer  
Portsmouth Naval Shipyard  
Portsmouth, NH 03084-5000

Re: Modification of U.S. Environmental Protection Agency (EPA)  
Approval with Conditions of the RCRA Facility Investigation  
(RFI) Proposal for Portsmouth Naval Shipyard (PNS).

Dear Captain Hagge:

Based upon the results of the February 11, 1991 meeting between representatives of the Navy and the EPA and the February 19, 1991 meeting between Linda Resta of Naval Facilities Engineering Command and Ernest Waterman of my staff the purpose of this letter is to formally modify several of the conditions set in EPA's Approval with Conditions of the RFI Proposal. The modified conditions are provided in Attachment A.

In addition to the conditions modified by this letter it is our understanding that due to the complexity of the revisions involved the Navy feels that it cannot fully respond to seven of the conditions set in the RFI Proposal Approval by the February 28, 1991 response date set for those conditions. To allow the Navy sufficient time to respond fully to those conditions and to minimize the number of documents comprising the complete RFI Proposal EPA accepts the Navy's proposal to submit a response in letter format by February 28 1991 and to postpone submission of a final addendum to the RFI Proposal until March 29, 1991.

If you have any questions on this letter please call me or Ernest Waterman of my staff at (617) 223-5511.

Sincerely,

A handwritten signature in cursive script that reads "David M. Webster".

David Webster, Chief  
ME, NH, & VT Waste Regulation Section

Enclosure

cc: Ken Finklestein, NOAA  
Pamela Parker, ME DEP  
Linda Resta, USN



Attachment A  
Modified Conditions

Based on agreements reached at our February 11, 1991 meeting four of the conditions set on the RFI Proposal are being modified. The modified conditions are presented below with underlining to show where new text has been written into the condition and empty brackets to show where text has been removed from the condition.

1. General condition #1 of the RFI Proposal shall now read:

Prepare a plan for screening of all samples collected at the site with a geiger counter; inclusion of a geiger counter in the monitoring of field activities; [ ] and a radiation survey of SWMU 6 and 8 (DRMO and JILF) [ ].

2. Condition #6 for Section 4.0 of the RFI Proposal shall now read:

Revise Section 4.0 to specify that all surface soil sampling locations, at any given location, will include both shallow soil (0-3 inches and deeper soil (at approximately 12 inches deep) if obtainable or will be a composite sample from 0-12 inches. An acceptable approach is to obtain for analysis one composite sample taken from 0-3 inches and a second composite sample from 15-18 inches (or the deepest three inch interval less than 15-18 inches which is obtainable) at each surface soil sample location. Specify how the results from these samples will be used in the Public Health and Environmental Risk Assessment (PHERE).

Note that this is the second modification of this condition. The first modification was made in the February 6, 1991 letter from EPA to the Navy.

3. Condition #7 for Section 4.0 of the RFI Proposal shall now read:

Identify locations or provide for the future identification of locations for the collection of background surface and subsurface soil samples and provide a rationale for locations chosen as part of the location identification.

Background soil samples were called for in EPA's March 13, 1990 comment letter and are needed to support performance of Part II.F of the HSWA Permit.

4. Condition #4 for Section 9.0 of the RFI Proposal shall now read:

Remove the sentence on p. 9-3 which reads "During the excavation--in a scheme acceptable to DEP and EPA--sampling of soil will be performed," and replace with the sentences "A scheme for the excavation and removal of underground storage tank SWMUs shall be developed and submitted to EPA and ME DEP [ ]. During excavation soil sampling will be conducted." or draft new sentences which convey the equivalent information.