



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

N00102.AR.000046
NSY PORTSMOUTH
5090.3a

IN REPLY REFER TO

1423/LR
4 March 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
Approval with Conditions

Dear Mr. Webster:

This letter is to clarify the intent of the Navy's submission dated 28 February, 1991, which addressed EPA's conditions for approval of the RCRA Facility Investigation Proposal. This document was submitted by the Navy to address and fully comply with all conditions set forth by EPA, excluding the seven conditions to be addressed by 29 March 1991.

The Navy realizes that the lack of action statements has contributed to EPA's misinterpretation of the submission. Through the reiteration of EPA's condition, the Navy intended to accept the condition, and regrets that the EPA misunderstood the Navy's intent.

As agreed to at the 4 March 1991 TRC meeting the following conditions are clarified:

Section

Action

General Comments

Condition 1

The following will replace the paragraph on B-16, para. 8.2.4 AFTER "....Safety Officer." and BEFORE "Decontamination and Disposal Procedures:". Surveillance Equipment, Clothing, and Materials: Ambient air monitoring equipment will include one or more of the following: OVA or HNU, Draeger or other colorimetric sampling equipment, and chlorine detection equipment. Although man-made radioactivity is neither expected nor likely to be found, EPA requests that field monitoring equipment will include a standard geiger survey meter.

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Section	Action
(Cont'd) Condition 1	When wells are installed the geiger meter will be used to survey the operation and the results included with other field screening information on the geological boring logs. All samples collected, including soil samples taken from SWMUs 6 and 8, will be screened with the geiger meter at the time of collecting the sample. Thus, radioactive surveys will be completed upon completion of installing wells and collecting soil samples.
<u>Section 1.0</u>	<u>Initial Facility Characterization</u>
Condition 2, 3 & 4	The Navy will comply with EPA's condition.
Condition 14	A mistake was made in the addendum. The Navy will revise Table 1-6 to reflect all available historical data concerning tank contents.
<u>Section 2.0</u>	<u>Preliminary Investigation of Corrective Measures</u>
Condition 2	The sentence will be revised as per EPA's comment.
<u>Section 3.0</u>	<u>Surface Geophysical Investigation</u>
	No clarification required.
<u>Section 4.0</u>	<u>Soils Investigation</u>
Condition 5	The Navy will comply and use the 11.7 eV lamp.
Condition 6	The Navy is in receipt of EPA's 26 February 1991 modification and will comply with this condition.
Condition 9	The Navy has tentatively identified the location of the Appendix IX sample and will comply.
Condition 11,15	The Navy will comply and revise the sentence.

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Section 5.0

Ground Water Hydraulics

Condition 3

The Navy will comply and revise the sentence.

Section

Action

Section 6.0

Hydrogeologic Monitoring Plan

Condition 1

The Navy will comply as outlined in the addendum. All previous work performed prior to RFIP approval will be reviewed with EPA.

Condition 5

The Navy will use the terms "landward" and "seaward" until a water follow pattern can be established.

Condition 9

The Navy will comply and remove the sentence from the RFIP.

Condition 13

The Navy will comply and revise the sentence.

Condition 18 & 19

The Navy will revise the sentences to comply with EPA's comment.

Condition 20

The Navy will add the sentence to comply with EPA's condition.

Condition 22

The Navy will revise the sentence to comply with EPA's condition.

Conditions 23 & 24

The Navy will revise the sentence to comply with EPA's condition.

Section 7.0

Subsurface Gas Characterization

No Clarification required

Section 8.0

Sediment Characterization

The Navy has met with EPA to discuss the conditions in this section and has agreed to comply. The final sediment characterization plan will be submitted by 29 March 1991.

Section 9.0

Tank Investigation

Condition 3

The Navy is in receipt of EPA's 7 February 1991 modification and will comply with the condition.

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Section 10 **Biota Characterization**

Condition 1 The Navy will replace the sentence to comply with EPA's condition.

Section **Action**

Condition 2 The Navy will add EPA's sentence at the end of the third paragraph on page 10-3 and will also add an additional paragraph at the end of Section 10.2.

Section 11 **QAPP**

This section will be revised in its entirety to reflect EPA's conditions.

Section 12 **Data Management Plan**

This section was approved without conditions.

Section 13 **Health & Safety Plan**

No conditions

Section 14 **Project Monitoring Plan**

Condition 1,2 & 3 These conditions have been met and presented to EPA.

Section 15 **Public Health & Environmental Risk**

Conditions 1,2 & 3 The Navy will revise the sentences and comply with EPA's conditions.

Appendices

Condition 1 The Navy will resubmit Appendix C in a legible format.

The Navy is committed to resolving this in an acceptable manner to all parties. We hope that this clarifies the addendum submitted to EPA on 28 February 1991. The only outstanding conditions to be finalized are the Air Monitoring Proposal, Soil samples below the water table, Sediment Sampling Plan, SWMU 26 Sampling Plan, Tank Removal Scheme, and the QAPP Revisions which will be submitted to EPA by 29 March 1991.

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If the above does not clarify the concerns that were expressed by EPA during the 4 March 1991 TRC meeting, please contact me to resolve any objections.

Sincerely,

Linda Resta

LINDA RESTA

Remedial Project Manager

By direction of the Commanding Officer

Copy to:

Chris Mitchell

Onil Roy

Phil McCarthy

MEDEP (Pam Parker)

PORTS (Code 410.5)

McLaren, Hart (S. Urschel)

Internal copy to:

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