



DEPARTMENT OF THE NAVY

NORTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
10 INDUSTRIAL HIGHWAY  
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LESTER, PA 19113-2090

IN REPLY REFER TO

5090  
Ser 1864/1823:dec  
15 April 1993

Mr. Ernest Waterman  
U.S. Environmental Protection Agency  
Region I  
Waste Management Section  
JFK Federal Building  
Boston, MA 02203-2211

Re: MINUTES OF 11 MARCH 1993 MEETING

Dear Mr. Waterman:

Enclosed is a copy of the minutes from the meeting at which we discussed the requirements/expectations of the Phase I Off-Shore Report being prepared for Portsmouth Naval Shipyard. This draft represents a summary of the meeting and highlights the major points of discussions. If you wish to make any changes or additions, feel free to contact me at (215) 595-0567.

Sincerely,

*Deborah Carlson*

D. E. CARLSON  
Remedial Project Manager  
By direction of the Commanding Officer

Copy to:

EPA Region I (P. Tyler)  
PORTSMOUTH (120, 121, 121.5)  
NCCOSC (R. Johnston)  
NCCOSC (J. Grouvhoug)  
ERLN (S. Nelson)  
ERLN (H. Walker)  
ERLN (J. Garber)  
McLaren Hart (S. Urschel)

**MINUTES OF MEETING**

**Subject:** Phase I Off-Shore Investigation at Portsmouth Naval Shipyard

**Purpose:** To review the requirements of the ongoing Phase I and II off-shore investigation with respect to the RCRA permit and ensure all permit requirements are being met within a satisfactory timeframe.

**Location:** U.S. EPA Region I Headquarters  
90 Canal Street  
Boston, MA

**Date:** 11 March 1993

**Prepared By:** Deborah Carlson, Remedial Project Manager  
Northern Division, NAVFACENGCOM  
Philadelphia, PA  
15 April 1993

**Attendees:** USEPA Region I  
Ernest Waterman, Project Coordinator  
Patti L. Tyler, Ecological Risk Assessor

Northern Division NAVFACENGCOM  
Deborah Carlson, Remedial Project Manager  
Simeon Hahn, Biologist

Portsmouth Naval Shipyard  
Jim Tayon, Shipyard Project Engineer

Naval Command Control & Ocean Surveillance Center  
Robert Johnston, Project Officer/Scientist

USEPA Research Lab Narragansett  
Henry Walker, Environmental Scientist  
Skip Nelson, Environmental Scientist

The following represents topics and discussion that occurred among the attendees at the subject meeting:

The first topic of the meeting discussed the roles and responsibilities of EPA Research Laboratory Narragansett (ERL-N) in the investigations being conducted at Portsmouth Naval Shipyard. ERL-N is working under a MOU established with the Naval Command Control and Ocean Surveillance Center (NCCOSC) and their primary role is to conduct research in the area of ecological risk assessments in the marine environment. ERL-N does not have any involvement in regulatory management decisions and does not promulgate or enforce regulations. But on the other hand, ERL-N does not represent the Navy with respect to meeting the RCRA permit requirements. ERL-N's involvement will be only with the research and compilation of scientific data. Interpretation and writing of documents to meet the RCRA permit requirements are the responsibility of the Navy and their contractors. In addition to reviewing the roles and responsibilities of ERL-N, we discussed the problems with getting funds accepted. There have been critical delays in processing of funds within ERL-N which have impacted the schedule by at least 4 months. ERL-N is required to follow strict financial procedures and can not work on a project until funding has been accepted and established in the appropriate account. Based on ERL-N's commitment to the project, there will be closer involvement in ensuring funds are accepted in a timely manner.

The second and primary topic discussed was the off-shore ecological assessment being conducted. E. Waterman described what his expectations are from the Phase I off-shore report with respect to the RCRA Corrective Action Program at Portsmouth Naval Shipyard. Basically, the Phase I report must provide enough information to move the offshore portion of the project into the Corrective Measures Study.

The report should be able to address the following areas:

- \* Sufficient biologic sampling to characterize; the biota which inhibit/utilize the estuary, the interrelationships between the biota and the physical environment and identify stress at the individual, population and community levels.

Review of the Preliminary Phase I report along with the Historical Overview appears to have sufficient information to characterize the biota in the estuary and its interrelationships.

- \* Sufficient hydrodynamic data to characterize the fate and transport of hazardous wastes/hazardous constituents released from the shipyard

The hydrodynamic model needs to address what is migrating off the shipyard. B. Johnston indicated that is in the

process of being developed and could be fast tracked. It was also indicated that we could probably move ahead with corrective measures without having the completed dispersion model.

- \* Sufficient sediment sampling to characterize; the physical nature and distribution of bottom sediments and the areal and vertical distribution of hazardous waste/hazardous constituents found in these sediments. (i.e. depositional areas)

The sediment distribution map will be required prior to corrective measures and will be completed by April 1993 and submitted with the Final Draft Phase I Report. Phase II will allow us to go back and review particular areas for accumulation.

- \* Sufficient water sampling data to characterize; the general water quality of the estuary and the loading of hazardous waste/hazardous constituents in the water column.

Discussions indicated that sediment toxicity will probably drive corrective measures with water column toxicity less of an issue. From an order of magnitude there will be enough information in the Final Draft Phase I Report to proceed corrective measures with confirmation in Phase II.

- \* Risk characterization which evaluates the link between ecological effects observed in the estuary and exposure to hazardous waste/hazardous constituents and permits delineation of areas and conditions which require remediation.

Risk characterization is the biggest area that was not addressed in the Preliminary Phase I Report.

- \* Ability to propose Media Protection Standards

The Phase I Report must address some type of Media Protection Standards with the possibility that final cleanup levels can be different once we have the time to catch up. It was suggested that literature levels be reviewed and possibility keep it at a quantity level. In most cases, the Media Protection Standards are the cleanup levels. B. Johnston indicated that the report will not address the MPS since this decision is part of the Risk Management Stage of the Risk Assessment Framework.

- \* Any needed data to partition hazardous waste/hazardous constituents released from the Shipyard from hazardous waste/hazardous constituents released from any other sources.

This requirement will primarily be covered during Phase II of the investigation.

E. Waterman identified at the end of Phase I, the Navy should be able to link the onshore and offshore results without worrying that information evaluated later on during the Phase II investigations could change corrective measures being developed or already in place. B. Johnston indicated that the Navy would probably not be able to give a definite "yes" or "no" but could establish boundaries to make an educated decision.

In terms of the upcoming Public Workshop, the Navy should be able to answer the following

- \* Are releases from past on-shore activities causing problems off-shore in the estuary.
- \* If there is evidence that contamination is being released into the estuary from the shipyard, where are the big problem areas.

An updated schedule was presented by B. Johnston which listed submission dates for the different tasks being completed for the study. The submission dates were acceptable with emphasis that the reports listed for an April submission must be met.

The Ecological Risk Assessment is being conducted based on the EPA Framework for Ecological Risk Assessments published in February 1992. The framework is generic and can apply to both RCRA and CERCLA project assessments.

Enhancement of the estuary was also introduced if remediation of an areas does not seem feasible. Enhancement would give something back to the estuary and compensate for any loss. EPA indicated that was a reasonable approach but probably a bit premature to be discussing. The Navy should concentrate on remediation and partitioning prior to considering enhancement.

ACTION ITEMS:

- > Submission of the Draft Final Phase I Report must be received in April 1993.
- > All addresses on ERLN's Memorandum of Understanding must respond in writing that they understand and accept the terms of the MOU.