



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

5090

IN REPLY REFER TO

Ser 2125/1823/JMC

MAY 20 1994

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

Re: RCRA CORRECTIVE ACTION PROGRAM AT PORTSMOUTH NAVAL SHIPYARD;
GROUNDWATER MONITORING PLAN

Dear Mr. Waterman:

While considering comments received from both EPA and Maine Department of Environmental Protection (MEDEP) we have reevaluated our approach to developing a groundwater monitoring work plan. McLaren/Hart will soon be providing, on electronic media, a history of the monitoring wells installed and sampled at Portsmouth Naval Shipyard. This information and information available from previous investigations on the contaminants found and disposed of at individual SWMUs should be used to develop recommendations for sampling and analysis of individual wells or SWMUs.

Another consideration when evaluating contaminants to be analyzed for is to compare the concentrations found in past investigations to concentrations set in the Media Protection Standards. Those contaminants which are well below Media Protection Standards may be candidates to be eliminated from the list of analytes.

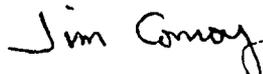
Evaluating information gathered during previous stages of the RCRA Facility Investigation to select analytes and wells for ground water monitoring may provide for reduced analytical costs during the implementation of the groundwater monitoring effort. If this effort does not reduce the initial sampling requirements it will serve as the basis to begin reviewing new data and develop revisions of the sampling effort once additional rounds of sampling are conducted. This type of examination will be necessary now or in the future to evaluate what to look for during groundwater monitoring.

Additionally, based on comments received at the last TRC meeting, section 4.2.2 of the Draft Groundwater Monitoring Work Plan will be evaluated with respect to the requirements of RCRA groundwater monitoring (subpart F) and those in the Maine solid waste regulations.

In the future, the enhanced understanding of groundwater flow at PNS, which the RCRA Facility Investigation Data Gap report will contribute, should be an additional basis to evaluate which wells should be included in the monitoring program.

Our intent is to provide a flexible monitoring effort which is protective of the environment but which does not waste valuable resources testing for chemicals which we have no basis to believe might be at a particular SWMU. Also, due to the limited availability of funds, this type of examination may make the difference in actually implementing a monitoring program prior to remedial actions. If you have any questions please contact me at (610) 595-0567 extension 117.

Sincerely,



JAMES M. CONROY, PE

LT, CEC, USN

Remedial Project Manager

By direction of the Commanding Officer

Copy to:

MEDEP (N. Beardsley)

PNS (Code 121.5)

Halliburton NUS (L. Klink)