



DEPARTMENT OF THE NAVY

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

IN REPLY REFER TO

5090  
Code 1823/JMC

OCT 31 1995

Ms. Meghan Cassidy  
U.S. Environmental Protection Agency Region I  
JFK Federal Building, HAN-CAN 1  
Boston, MA 02203-2211

Ms. Nancy Beardsley  
Maine Department of Environmental Protection  
State House Station 17  
Augusta, ME 04333-0017

Subj: INSTALLATION RESTORATION PROGRAM, PORTSMOUTH NAVAL SHIPYARD,  
KITTEERY, ME

Dear Ms. Cassidy and Ms. Beardsley:

Enclosed are the minutes from the September 22, 1995 Project Team Meeting at Portsmouth Naval Shipyard. Your comments on the draft meeting minutes have been incorporated. If you have any questions on this matter please call me at (610) 595-0567 extension 117.

Sincerely,

A handwritten signature in cursive script that reads "Jim Conroy".

JAMES M. CONROY, PE  
LT, CEC, USN  
Remedial Project Manager  
By direction of the  
Commanding Officer

Encl:  
(1) Meeting Minutes

Copy to: w/encl  
EPA (P. Whittemore)  
PNS (Code 121.10, F. Endyke)  
Halliburton NUS (L. Klink, M. Perry)

PORTSMOUTH NAVAL SHIPYARD  
INSTALLATION RESTORATION PROGRAM

PROJECT MANAGEMENT MEETING MINUTES

TIME: 8:00 AM, September 22, 1995

PLACE: MILITARY FAMILY HOUSING OFFICE

ATTENDEES: Meghan Cassidy/EPA  
Nancy Beardsley/MEDEP  
Richard Heath/MEDEP  
Fran Endyke/PNS  
Fred Evans/NorthDiv  
LT Jim Conroy/NorthDiv  
Linda Klink/Brown & Root Environmental (B&RE)  
Dave Brayack/B&RE

DISCUSSION:

A. Status of Investigations & Reports

RFI Data Gap Report

- The Navy will send a letter to the EPA, MEDEP (cc: RAB) stating we understand that there are no further changes required in the report. We will specify the date which we will submit the final report. Regulatory agency comments and Navy responses to the draft report will be added as an appendix.

Air Report

- MEDEP and EPA will check with the comment originators to determine the need for a conference call to resolve any Navy responses. Jim requested that this call be in the next 1 to 2 weeks.

### Off-Shore ERA

- The EPA and MEDEP comments on this report are forthcoming shortly.

### Off-Shore ECO MPS

- The Navy has received the pre-release draft for review prior to submittal.

### Off-Shore HH MPS

- Meghan requested that the rationale and development behind the procedures used to develop the MPS be explained fully in the report. This is necessary to fully provide all readers w/the approach used to develop the MPS.

### Ground Water Monitoring Work Plan

- There was considerable discussion on the issue of low flow sampling (LFS). The EPA LFS procedure has been recently updated. Meghan will request a copy from Dick Willy and will provide to the Navy. Also, the workplan will provide a detailed procedure to determine when a sample will be taken following purging. (field parameter stabilization, well volumes purged). The Navy will provide, once developed, for a review by EPA/MEDEP. Fran recommended a pilot trial run prior to the actual sampling effort. This would be used to ensure the low flow sampling is done correctly and field parameters stabilize. (Any additional input from EPA or MEDEP on low flow sampling and field parameters (DO) would<sup>be</sup> appreciated, if there are any preferences.)  
Meghan will check w/Dick Willy to see if LFS has been applied in a similar situation with respect to (salinity and tidal fluctuations).

Also Jim explained that because of the additional work being proposed in response to EPA/MEDEP comments the 1st round of sampling will probably not occur until Spring.

#### B. SWMU 12, 13, 16, 23

Jim proposed that NFA be taken at SWMU 12, 13, 16 & 23 and these sites be closed out and not incorporated into the FFA. After discussion it was decided that the best way to do this is to:

- issue a public notice of intent
- issue a fact sheet providing site information and rationale for decision
- A no further action decision document which would be signed by PNS, ND, EPA and MEDEP project managers.

Nancy and Meghan agreed to review the available site information to determine if they are willing to sign such a decision document. Meghan will provide a recent no further action decision document as an example (no standard guidance is available).

#### C. SWMU 27

After much discussion the following issues were presented:

- The PNS HSWA permit only covers the portion of the fuel oil pipeline which was abandoned and removed 1978.
- Under CERCLA a TPH (petroleum related contamination) cleanup standard cannot be set by the EPA or State.
- The PNS Fuel Farm permit w/MEDEP may require cleanup at the tank farm including free product and contaminated soil removal. This permit may or may not include cleanup along the fuel pipeline.
- SWMU 27 can remain in the IR Program and remedial actions taken to MPS. However, the groundwater metals problem does not appear to be related to SWMU 27.
- MEDEP does not believe the vertical extent of contamination has been adequately characterized.
- The question was asked: How do GW concentrations compare with AWQC levels? AWQC levels are being used as a basis for the offshore MPSSs.
- Nancy will review state laws to see if there is a program which could cover the Fuel Oil Pipeline and any spills along its length. There is also a meeting being held the week of Oct 11 w/Rick Kaselis (MEDEP), Bill Lott (PNS) and Mary Hunt (ND) to discuss finalization of the Tank Farm investigation.

#### D. ARARs

Nancy will send the Navy a list of ARARs for OU-1 or SWMU 10. She also noted that State offshore Ambient Water Quality Criteria

(AWQC) were not listed in the onshore ARAR report and she will provide these to the Navy.

#### **E. Background Soil Concentrations**

Meghan asked how background soil concentrations were established, especially with respect to Pb & As. (Background was established as the 95% UCL from the 2 rounds of sampling.)

#### **F. SWMU 10**

Additional activity is planned by the Navy before proceeding with the FS for this site. Recently available IAS interview sheets indicate potential fill line leakage, this will require additional investigation prior to continuing with the FS. MEDEP and EPA requested copies of these interview sheets which the Navy will provide.

#### **G. SWMU 21**

The Navy believes this site does not warrant any further action. However, because no groundwater information is available at this site we recognize that it is difficult to conclusively argue that the groundwater has not been impacted. (NOTE: results of testing soils and tank contents are an indication that impact to groundwater is unlikely). MEDEP is concerned about the proximity of the tank to bedrock.

Several options which could be explored were discussed:

- 1) No further remedial action planned (NFRAP).
- 2) NFRAP on soils with GW addressed in future.
- 3) No action on soils or GW at this time but address groundwater issues with a larger groundwater investigation which will be required at the West Timber Basin Landfill site. (This option appears to be the most favorable.)

#### **H. FS comment response letter**

We agreed that this letter should be finalized. In some cases it serves as a basis for future work or evaluations of existing work.

Nancy expressed concern that the RAB should receive draft comment responses and MEDEP decisions regarding them. This issue was tabled until MEDEP decides whether to resolve draft response to comments prior to Navy finalization or continue with formal letters. Either a conference call or a meeting will be required depending on the magnitude of the follow-up comments.

#### **I. Interim Remedial Actions (IRAs)**

IRAs at SWMU 9 and SWMU 11 will not be possible in FY-96 because:

- SWMU 9 is ranked as a medium relative risk site and no free

product was found at SWMU 11 during the RFI or RFI Data Gap investigation.

**J. Nov 16th RAB meeting**

Presentation of the off-shore Human Health Based Media Protection Standards is the primary focus of the meeting. A presentation on the risk associated with seafood consumption should precede the MPS presentation. NEHC is revising the seafood ingestion risk assessment to incorporate the Phase II data, available for Navy review Oct 6th. This will be made available to MEDEP and EPA at the earliest possible time.