

N00102.AR.001785
NSY PORTSMOUTH
5090.3a

LETTER AND COMMENTS FROM U S NAVY REGARDING RESOURCE CONSERVATION
AND RECOVERY ACT FACILITY ASSESSMENT NSY PORTSMOUTH ME
10/15/1986
PORTSMOUTH NAVAL SHIPYARD

420.05
3920
COPIES
FILE

420.05: KWP, YAC
11350
Checked by
Ser 420/005
15 OCT 1986

U. S. Environmental Protection Agency
Maine Waste Regulation Section
Attn: Mr. K. Chin, P.E.
Region I
J. F. Kennedy Federal Building
Boston, MA 02203

420.05
KWP
10/7/86
420/005

Gentlemen:

In response to your 5 Sep 86 letter which requested comments on the RCRA Facility Assessment (RFA), Portsmouth Naval Shipyard has reviewed the RFA and our comments are enclosed.

57
14
400

Questions may be referred to Kenneth W. Plalsted, Code 420.05, at (207) 438-1218.

Sincerely,

440.01
MAC

D. J. MONARCH, JR.
Captain, CEC, USN
Public Works Officer
By direction of the Commander

Encl:
(1) Comments

- Copy to:
- 100L
- 107
- 400
- 420
- 420.01
- ✓ 420.05
- 420.051
- 420.052

I have personally reviewed this work and consider it to be a quality work product.

Typist V. Carignan
Originator _____
Reviewer _____

V. Carignan, 6 Oct 86
K. W. Plalsted, 420.05, xlets

MAILED

Incls.

FILED

3423
3423



PORTSMOUTH NAVAL SHIPYARD
RCRA FACILITY ASSESSMENT COMMENTS

Page 2 FACILITY DESCRIPTION

The Shipyard has 230 buildings.

Page 2 SHIPFITTER SHOP

Sodium Cyanide is no longer used for case-hardening. Now use Barium Chloride.

Page 4 TABLE 5-1

Shops 38 and 56 freon usage has dropped way down. Actual figures are not available. Shop 99 freon still bottoms have been eliminated. The freon still is not in operation and the Shipyard has submitted a Closure Plan to the State DEP.

Page 5 SHEET METAL SHOP

The spent solutions are transferred directly to a tanker trailer which delivers to the Industrial Waste Treatment Plant.

The rinse tanks are serviced in a similar manner.

The underground tank receives drag-out from floor drains and the wash water from a wash machine which is located in the shop metal cleaning facility.

Page 5 PIPEFITTER SHOP

The vapor degreaser operation in Bldg. 89 was discontinued in the 70's. All use of trichloroethylene stopped at that time.

Bldg. 155 contains an alkaline degreasing tank. When spent, this solution is transferred directly to tanker trailer for shipment to the Industrial Waste Treatment Plant.

Bldg. 174 houses freon still which is no longer used. Shipyard has submitted Closure Plan to the State DEP.

There are no flushing operations in the building.

Bldg. 174 houses a parts cleaning facility with acid and alkaline dip tanks. Spent solutions go to the Industrial Waste Treatment Plant via tanker trailer. Rinse solutions and drag-out go to underground tanks which are also serviced by the Industrial Waste Treatment Plant tanker trailer.





Page 5 MACHINE SHOPS

The spend acid and alkaline solutions are transferred by tanker trailer to the Industrial Waste Treatment Plant. The drag-out and rinse solutions go to underground tanks. When full, the underground tanks are serviced by the Industrial Waste Treatment Plant tanker trailer.

Page 6 ELECTRIC SHOP

The underground tank at Bldg. 238 is slated for removal this year. Tank has been out of service since 1984. Waste from battery work are collected in a portable acid chemical tank. Tank, when full, is transported to the Industrial Waste Treatment Plant.

Page 7 PRINTING AND PHOTOGRAPHY OPERATIONS

There is not a silver recovery operation in Bldg. 20.

UNIT CONDITIONS, CONCLUSIONS AND RECOMMENDATIONS

PAGE 17 HAZARDOUS WASTE STORAGE FACILITY

No drums are stored inside the office/supply storage building. The area is surrounded by a 6 inch asphalt berm and by an 8 foot high chain-link fence. The area is sloped to a water gate.

Page 19 FREON RECOVERY OPERATIONS

This unit has been out of service since 1985 and is slated for dismantling and removal. A Closure Plan has been submitted to the State for approval. The 4,000 gallon holding tank is empty.

Page 20 INDUSTRIAL WASTE TREATMENT PLANT

Waste storage tank No. 23 has been out of service since 1985. This tank is slated for removal.

The proposed State of Maine consent agreement of July 1985 was incorrect. Acetone has never gone to the Industrial Waste Treatment Plant.

Page 21 INTERMEDIATE STORAGE FACILITIES

The four intermediate storage areas were taken out of service in June of 1986. A Closure Plan has been submitted to the State of Maine.





Page 22 INDUSTRIAL WASTE OUTFALLS

The outfalls were located along the Shipyard's Industrial waterfront with the primary areas being Berths 6, 4, 2, and 11.

The reason for the testing of the sediments was a proposed dredging project. Prior to the spoil disposal, sediments had to be sampled and tested for contaminants.

Dredging operations were conducted to widen and deepen submarine berths.

Page 24 DPDO STORAGE YARD

This facility functions as a receiving and sorting area for scrap metal and equipment. The materials are stored here temporarily until off-site recycling or disposal.

A final Phase II study report was issued in June 1986. This report calls for a remedial action feasibility study with the recommended solution being the removal of the top 12 inches of soil.

Page 26 INTERIM STORAGE AREAS

The Closure Plan for these areas is awaiting State approval.

Page 27 JAMAICA ISLAND LANDFILL

The PCB level detected (8.8 ppm) has been taken out of context. The equivalent wet weight-edible portion (4.4 ppm) is less than the U.S. Food and Drug Administration limit of 5 ppm.

Page 28 TABLE 28

Sandblast grit quantity - 5,000 tons/yr.

Page 32 MERCURY BURIAL SITE

The concrete vaults were originally buried under 8 to 10 feet of fill. However, the dredge spoil, and other filling operations have since buried the vaults an additional 15 feet.

Page 33 TANK NO. 24 (BLDG. 238)

This tank was taken out of service in 1984. Battery dismantling is mentioned in our Hazardous Waste Storage Facility State of Maine License, as being licensed by rule.





This tank is scheduled for removal either this fall or next spring. A Closure Plan for these removals has been approved by the State of Maine as part of Shipyard Hazardous Waste Storage Facility License.

The groundwater at this location is tidal.

Page 34 WASTE OIL TANKS (JAMAICA ISLAND)

Shipyard analytical lab testing results indicate that spent degreasing solvents have not contaminated the Jamaica Island waste oil storage tanks.

Prior to off-site shipment of our waste oil, the contents of the Jamaica Island tanks is tested for the following:

- pH of Water Layer
- Flash Point
- Gas Chromatography for Chlorinated Solvents
- Toxic Metals in Water Layer

The testing has been performed on our waste oil since 1981.

These tanks are scheduled for precision testing this fall.

Page 36 BOILER BLOWDOWN TANK (BLDG. 72)

This tank serves as a temporary holding tank for power plant boiler blowdown. Pumps discharge tank's contents to the sanitary sewer.

Page 36 WASTE OIL TANK NO. 31 (ASSOCIATED WITH POWER PLANT OIL/WATER SEPARATOR)

This tank is part of the oil spill contingency facility at power plant fuel transfer location. This tank would receive the oil from the adjacent oil/water separator in the event of a spill.

Page 36 OIL/WATER SEPARATOR NO. 32 (OIL SPILL CONTINGENCY EQUIPMENT AT POWER PLANT FUEL TRANSFER FACILITY)

In the event of an oil spill during fuel transfer, drain system directs flow to oil/water separator.

Page 37 FLOOR DRAIN WATER TANK NO. 26

This unit has been confused with Unit No. 23 on Page 38 (Chemical Cleaning Facility tank). Eliminate this unit.





Page 37 WASTE OIL TANK NO. 37

This tank is located in the Auto Hobby Shop and is the storage tank for the oil/water separator tank.

Page 38 OIL/WATER SEPARATOR NO. 38

This oil/water separator is located in the Auto Hobby Shop and is connected to the floor drain system.

Page 38 ACID/ALKALINE DRAIN TANK (BLDG. 75)

This tank receives drag-out (from floor drain system) from the acid/alkaline metal surface-cleaning operations. The acid/alkaline tanks themselves are serviced by tanker trailer. The tank also receives discharge from wash machine located in the area (Dreft detergent used in this machine).
Period of Operation: 1974 to present.

Page 38 CHEMICAL CLEANING FACILITY TANK (BLDG. 174)

Period of Operation: 1974 to present.
Wastes: Waste acid and alkaline rinse waters from metal surface cleaning solutions.

This tank is serviced by the Industrial Waste Treatment Facility tanker trailer.

Page 41 CHEMICAL CLEANING FACILITY TANK (BLDG. 155)

This unit is a 4,000 gallon above ground tank which receives oily wastes from the flushing of hydraulic hoses.

As explained in the facility description, Page 5, the alkaline metal parts cleaning tank is serviced by the Industrial Waste Treatment Plant.

Period of Operation: 1974 to present.
Wastes: Oily Waste water.

Page 42 ASBESTOS COLLECTION DUMPSTER

The Shipyard maintains two 30 cubic yard roll-off containers for the storage of asbestos waste. The waste is contained in double lined polyethylene bags and sealed with duct tape. The asbestos waste is initially collected in several color coded (white w/black lettering) dumpster containers located adjacent to work sites throughout the facility. The asbestos roll-off containers, when full, are covered and shipped off-site with manifest to a license landfill.





Page 43 BURNABLE DUMPSTERS

Red enclosed dempster dumpster buckets are located throughout the Shipyard for the collection of non-hazardous waste. These dumpsters, when full, are transported to a refuse transfer station where the materials are dumped into a compactor. When full, the compactor is transported to the Pease Air Force Base Incinerator.

Wastes: Non-hazardous burnable wastes only.

Waste sorbent materials, sorbent materials contaminated with solvents, oils and other such materials are drummed and shipped to the Shipyard's licensed Hazardous Waste Storage Facility.

Page 44 OIL/WATER DUMPSTERS

Wastes: Acidic cleaning solutions, detergent cleaners and oily water mixtures.

History of Releases: The eleven oil spills mentioned were all not caused by the overflow of oil/water dumpster tanks.

Page 45 FUEL OIL SPILL

The 1978 oil release was of undetermined quantity. The pipes involved were excavated and removed.

