



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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December 23, 1999

Mr. Fred Evans  
Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Hwy., Mail Stop #82  
Lester, PA 19113-2090

Re: Draft Final Work Plan for  
Mercury Burial Vault II and Drum Investigation  
Portsmouth Naval Shipyard  
Kittery, Maine

Dear Fred:

The United States Environmental Protection Agency (EPA) has reviewed the draft final version of the document entitled "Work Plan for Mercury Burial Vault II and Drum Investigation at Portsmouth Naval Shipyard, Kittery, Maine". The document is dated December 1999 and was received in this office on December 20, 1999.

As requested in EPA's comments on an earlier draft of this document, the objective of the proposed work has been clarified. The proposed work is being performed to provide additional characterization information regarding the Jamaica Island Landfill (JILF). The work will also attempt to locate Mercury Burial Vault II (MBII). As stated by the Navy, this work will supplement the extensive amount of information already available for the JILF.

EPA's comments on the draft final Work Plan are as follows.

1. The text states that if MBII is located it will be removed as a Time-Critical Removal Action. However, there is no specific information provided regarding how this removal would be conducted. EPA recommends that the document indicate that a removal action at MBII would be completed in accordance with the final work plan for Mercury Burial Vault I. This work plan outlines sampling requirements, analytical procedures, etc.
2. The Work Plan for MBII and Drum Investigation work does not make any mention of any proposed analytical work (i.e., laboratory analysis of soil from test pits). EPA recalls that at the technical meeting on December 15, 1999 the Navy indicated that some of the soil from the test pits would be analyzed for certain chemical constituents. Given the

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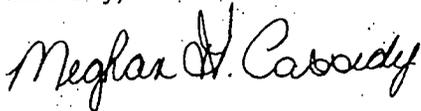
clarified objective of the proposed work, EPA realizes that chemical analysis may no longer be a proposed component of the work plan. However, this needs to be clarified. If any samples will be analyzed, the Navy should document that they will use Standard Operating Procedures (SOPs), laboratory methods, etc. that have already been reviewed and approved by EPA's Quality Assurance/Quality Control staff. If the Navy intends to use different and/or new procedures, they should be submitted to EPA for review.

3. Page 4-4 of the Work Plan states that if MBII and/or drums containing materials are removed, the removal would be considered a Time-Critical Removal Action. The text further states that the action would be documented in a Removal Action Close-Out Report. EPA reminds the Navy that depending on the type of removal action pursued, there may be requirements in addition to a Close-Out Report.

Given the scope of the proposed work and the intended use of the information (i.e., supplemental site characterization), EPA has no further comments.

Should the Navy have any questions regarding the comments provided above, please contact me at (617)918-1387.

Sincerely,



Meghan F. Cassidy  
Remedial Project Manager

cc: Marty Raymond/PNS  
Iver McLeod/ME DEP  
Carolyn Lepage/Lepage Environmental  
RAB Members