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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
ONE CONGRESS STREET
BOSTON, MASSACHUSETTS 02203-2211

March 2, 1994

Mr. Fred Evans
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Draft Final Long Term Monitoring Plan
Building 95, Sites 1 and 3, and Eastern Plume
January 1994

Dear Fred:

The United States Environmental Protection Agency (EPA) has reviewed the document entitled Draft Final Long Term Monitoring Plan Building 95, Sites 1 and 3, and Eastern Plume dated January 1994. The EPA's comments are found in Attachment I of this letter.

Prior to implementing the monitoring program for Sites 1 and 3, and the Eastern Plume, the EPA, as stated in our draft comments, requires a method detection limit (MDL) study to be performed to demonstrate the laboratory's ability to detect vinyl chloride at 2 µg/L. Procedures for performing an MDL study can be found in 40 CFR 136, Appendix B. Upon the Navy's submission of this study, the EPA will consider this issue to be closed.

Should you have any questions regarding the EPA's comments, please feel free to call me at (617) 223-5521.

Sincerely,

Robert Lim, Remedial Project Manager
Federal Facilities Superfund Section

Enclosure

- cc. Meghan Cassidy/EPA
- Nancy Beardsley/MEDEP
- Jim Caruthers/NASB
- Robert McGirr/ABB-ES
- Diane Whittle/SASCE
- Carolyn LaPage Barber, Inc.
- Sam Butcher/Harpswell Community Rep.
- Rene Bernier/Topsham Community Rep.

ATTACHMENT I

The following are the EPA's comments pertaining to the document entitled Draft Final Long Term Monitoring Plan Building 95, Sites 1 and 3, and Eastern Plume dated January 1994.

1. pg 2-1, Section 2.0 - This section needs additional detail.

It is correct to state that "the remedial actions undertaken at Sites 1 and 3, and the Eastern Plume will be performed under CERCLA and RCRA," however it is more correct to state that "the selected remedial actions.... will be performed to attain ARARs and as specified in their respective Records of Decision (RODs)." For Building 95, the following can be said, "a non-time critical removal action was conducted at Building 95 where DDT-contaminated soil was excavated and sent off-site for incineration."

In addition, it is correct to state that there is no specific guidance for developing long-term monitoring plan, however the "relevant and appropriate requirements" in the RODs list federal and state regulations from which part of this LTMP was developed. Therefore, the second sentence should be revised to read, "this LTMP was developed to comply with relevant and appropriate requirements, and the groundwater monitoring component of the selected removal alternative as found in the RODs and Engineering Evaluation/Cost Analysis (EE/CA), respectively. The requirements dealing with long-term monitoring were the RCRA requirements for detection monitoring (40 CFR 265 Subpart F) and landfill closure and post-closure (40 CFR §264.110-264.120), and State of Maine SWMR, Chapter 401."

2. pg 3-3, Section 3.1.2.3 - In the event that the laboratory does not meet the method detection limits during a regularly scheduled sampling event, how will the data set be treated?
3. pg 3-13, Table 3-5 - a. The Maximum Contaminant Level (MCL) for methylene chloride (a.k.a. dichloromethane) is incorrectly listed as proposed. It was finalized on July 17, 1992 and became effective on January 17, 1994.

b. The MCL for Nickel is incorrectly listed as proposed. It was finalized on July 17, 1992 and became effective on January 17, 1994.
4. pg 3-15, Section 3.2.2.2 - In the event that the laboratory does not meet the method detection limits during a regularly scheduled sampling event, how will the data set be treated?
5. pg 3-20, Section 3.2.2.4 - In addition to evaluating the groundwater extraction system, the water levels in the landfills at Sites 1 and 3 need to be specifically evaluated to determine if the groundwater levels are shown to rise

contacting the waste which may necessitate additional remedial measures.

6. Figure 3-2 - a. Table 3-8 lists MW-215 A & B as sampling locations, but Figure 3-2 only shows MW-215. Revise figure.

b. Table 3-8 lists MW-232 as a sampling location, but Figure 3-2 shows MW-232 A & B. If both A & B are to be sampled during monitoring program, then Table 3-8 needs to be revised.

c. Table 3-8 lists MW-230 as a sampling location, but Figure 3-2 shows MW-230 A & B. If both A & B are to be sampled during monitoring program, then Table 3-8 needs to be revised.