



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

April 20, 2007

Orlando Monaco (orlando.monaco@navy.mil)
Dept of the Navy, BRAC PMO Northeast
Code 5090 BPMO NE/LM
4911 South Broad St
Philadelphia, PA 19112-1303

Re: Navy Responses to EPA comments on Various Monitoring Events for Naval Air Station Brunswick, Maine Long Term Monitoring Program for sites 17, 9, and 1, 3 & Eastern Plume electronic mail dated March 29, 2007

Dear Mr. Monaco:

Pursuant to § 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency has reviewed the subject documents and comments are below:

Site 9, ME 26 (April 2005)

- Requested editorial changes will be made. The Response to #8 clarifies the intent of the words, "significant impacts," but it does not appear that changes will be made to the text. For future documents, the clarification should be provided in the text, so that an exceedance is not seemingly dismissed.
- Comment #1 is a reminder that EPA requested one round of low-flow samples on monitoring wells near the pond in order to test for acetone and MEK. The request was communicated in November 2005, after sampling for ME26 (the subject of this report) and ME27. The Reply states that the issue should be discussed. The final outcome is not clear from this exchange.
- Comment #6, EPA requests a summary of the validation memo be included in the text for clarity.
- Comment # 2, the response indicates the field data will be reviewed and the review will be included in the report. However, it is unclear that the calibration work sheets will be included in the report. EPA recommends that the field calibration work sheets be attached to the report.

Site 9, ME 27 (September 2005)

- Requested editorial changes will be made.

- Concerns regarding monitoring coverage, media sampled, and analytes (e.g., EPA #5, 8) were addressed in subsequent sampling (e.g., DRO analysis for groundwater), or are to be addressed in the forthcoming Site 9 direct-push investigation (Work Plan dated February 2007). It is noted, however, that EPA #8 recommended that sediment and surface water at the east end of (presumably the upper(?)) impoundment pond should be sampled for VOCs, SVOCs, and metals. This objective is not to be addressed in the forthcoming Site 9 investigation; the planned pore water sampling is directed specifically to further delineation of DRO impacts, and is focused on the western and central portions of the pond.
- Comment #14, EPA requests a summary of the validation memo be included in the text for clarity.
- MEDEP Comment #8, Location 2.2 – Discusses converting ORP to Eh. The conversion to Eh is performed in the field because to measure Eh the sample and standard (Zobell solution) are measured at the same temperature (within $\pm 0.1^\circ \text{C}$). This would need to be performed at each sampling location. Was this performed? Why is it necessary to report Eh rather than ORP?
- Comment #1, the response indicates the field data will be reviewed and the review will be included in the report. However, it is unclear that the calibration work sheets will be included in the report. EPA recommends that the field calibration work sheets be attached to the report.

Building 95, ME 22 (September 2005)

- Requested editorial changes will be made.
- Questions regarding detection limits are to be addressed by several actions, including a change in the contract laboratory, an updated Basewide QAPP specifying more stringent MDLs, and the addition to the reporting of a description of the data qualification conventions.
- Comment #3, EPA requests a summary of the validation memo be included in the text for clarity.
- Comment # 2, the response indicates the field data will be reviewed and the review will be included in the report. However, it is unclear that the calibration work sheets will be included in the report. EPA recommends that the field calibration work sheets be attached to the report.

Sites 1&3 and Eastern Plume, ME 26 (April 2005)

- Requested editorial changes will be made.
- The Response to EPA Comment #7 simply states that the bar graphs are "... meant to provide a quick synopsis of the data." It is agreed that these plots give a useful qualitative view of trends. They should nonetheless be updated and checked for each round, and assessments given in the text should be consistent with what is shown.
- MEDEP comment #25 was not addressed. Please address.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,



Christine A.P. Williams, RPM
Federal Facilities Superfund Section

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