



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
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BOSTON, MASSACHUSETTS 02114-2023

February 26, 2001

Lonnie Monaco (monacolj@exchange.efdnorth.northdiv.navy.mil)  
Northern Division, Naval Facilities Engineering Command  
Code 1821/LM  
10 Industrial Highway, Mailstop 82  
Lester, PA 19113-2090

**Re: Final Letter Work Plan for Groundwater and Soil Investigation at Site 7,  
Naval Air Station Brunswick, Maine**

Dear Mr. Monaco:

Thank you for the above final work plan and response to EPA comments on the draft work plan. The sustained cadmium concentration of approximately 50 ppb on the 48 hour pump test bedeviled EPA as well. As such, we fully concur with the Navy's intention to undertake phase II of the work plan.

In light of the higher cadmium concentrations than expected, MEDEP's comment about putting a sampling point(s) upgradient to help localize the area of concern may be of benefit to extracting the cadmium source soils. The planned placement of sampling points may also be impacted by the actual groundwater elevation at MW-96 being 1.8 feet lower than reported (per MEDEP's letter). We look forward to discussing site 7 activities at the upcoming project meeting on March 7.

After the removal is completed, EPA expects some degree of rebound as the remaining cadmium desorbs to reach geochemical equilibrium. The amount and rate of rebound will dependent upon many variables, but we expect may take place over several months rather than days or weeks. An interesting possible mitigating factor could be that previous use as an acid-caustic pit may actually reduce cadmium rebound because it is more mobile at site 7 than under natural conditions.

The resulting closure sampling plan will drive the time line to the Proposed Plan and Record of Decision (ROD). The EPA remains hopeful that this work will remove the source cadmium and result in a No Further Action ROD for site 7 by March, 2002. For any questions, please contact me at 617.918.1344 or [barry.michael@epa.gov](mailto:barry.michael@epa.gov).

Sincerely,

  
Michael S. Barry  
Remedial Project Manager  
Federal Facilities Superfund Section

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