



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

July 1, 1994

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

Dear Mr. Evans:

The United States Environmental Protection Agency (EPA) has reviewed the document entitled Draft Long Term Monitoring Plan Site 9, Neptune Drive Disposal site, dated June 1994. The EPA's comments are found in Attachment I of this letter. Should you have any questions, please feel free to call me at (617) 223-5521.

Sincerely,

A handwritten signature in cursive script that reads "Robert Lim".

Robert Lim, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc. Nancy Beardsley/MEDEP  
Jim Caruthers/NASB  
Beth Walter/ABB-ES, Inc.  
Susan Weddle/BACSE  
Carolyn LePage/Gerber, 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 Long Term Monitoring Plan (LTMP) for Site 9 dated Jun 1994.

### General Comments

1. Similar to the overall organizational problem identified in the review of the draft Proposed Plan, Section 1.3 in this report needs to be revised to integrate data from 1993 investigations with the RI data. The EPA understands that this plan was developed prior to the changes made in the Proposed Plan, however comments on Section 1.3 are provided for consideration in revising the investigations summary.
2. There is a tendency to dismiss many of the analytes, particularly solvents, as "common laboratory contaminants." While some of the analytes mentioned are common laboratory contaminants, this argument depends on the concentration of the analyte being reported and whether it has been detected in the associated blanks. In many cases, no information on the analyte concentration has been provided, therefore, it cannot be determined whether the authors had a reasonable basis for attributing the analyte to contamination of the sample. Where an analyte has been dismissed, a complete description of the reason needs to be provided.
3. The federal Maximum Contaminant Level for vinyl chloride is 2 µg/L. As the EPA had commented in the LTMP for the Eastern Plume, the Navy must demonstrate that this requirement can be met using SW-846 Method 8260 by submitting a Method Detection Limit (MDL) study. Making site decisions are difficult if the detection levels for contaminant(s) of concern is above the regulatory limit and/or estimated. The EPA also understands that the Navy is undertaking additional efforts aimed at obtaining representative groundwater samples at Site 9.

### Specific Comments

1. Page 1-9: A brief description of the current/recent use of Building 201 and the area behind it should be provided.
2. Page 1-15, Figure 1-5: There is no mention in the text of dibenzofuran reported at 5,100 ug/Kg in the sediment at SD-011.
3. Page 1-16, ¶ 2: Provide discussion on SW-916 where toluene was detected at a higher level than SW-915 (i.e., to what can this be attributable?).
4. Page 1-16, ¶ 2: Specify whether compounds identified for surface water samples exceeded acute or chronic AWQC.

5. Page 1-17, ¶ 1: Specify whether iron surface water sample exceeded acute or chronic AWQC.
6. Page 1-17, ¶ 1: AWQC should specify the freshwater chronic AWQC. In the case of iron, an AWQC limit is available for freshwater chronic (1.0 mg/L) as well as for water and fish ingestion (300 ug/L).
7. Page 1-17, ¶ 2: Comparison of concentrations of lead in sediments with background concentrations of lead in sand and clay soils is ineffectual. Delete last sentence since it does not add to the analysis.
8. Page 1-22: Include mercury in the list of contaminants detected above background range.
9. Page 1-32: The text should indicate that CRQLs for the TCL Pesticides/PCBs are frequently or consistently above the MCLs/MEGs.
10. Table 1-5: The shading used in the table needs to be defined.
11. Page 1-35, ¶ 1: a) The results for 1,1-DCA, toluene, and PAH, which are referenced as detected in SD-901, could not be found. The data or a reference to this data needs to be provided. In addition, reference Table 1-3 for inorganic sediment data.  
  
b) Toluene is not considered a common laboratory contaminant in CLP. The text should state that the result is below the CRQL.  
  
c) Road salt runoff would not appear to be a source for cyanide. An explanation needs to be provided if cyanide contamination is to be dismissed.
12. Page 1-35, ¶ 2: It seems that the first sentence of this paragraph is referring to investigations conducted in 1993. If so, please clarify because it implies that further investigations are recommended for South of Neptune Drive.
13. Page 1-37: It is unclear whether the VOC results are listed from the straight analysis of soil. Please clarify TCLP test results for VOCs.
14. Page 2-1: Page should be 2-2.
15. Table 3-1: DDT was detected in several sediment/seep samples. Freshwater chronic AWQC for DDT in surface water is extremely low (0.001 ug/L). Analysis of surface water for TCL pesticides at this level should be considered.
16. Table 3-1: The text should state whether TAL inorganics

analysis will include the analysis for cyanide.

17. Table 3-1: The addition of at least annual analysis of SW/SED-916 should be considered. One round of data indicates high levels of toluene, PAHs, and TOC at that location, which points toward a potential source in the vicinity. This may be non-point source runoff, but it does not appear to be fully evaluated.
18. Table 3-1: Sediment sampling at SD-901 should be considered. Sampling of SW/SD-920 should be considered due to the potential for the septic system to be a continuing source.
19. Table 3-1: Sampling of MW-902 to the north of Neptune Drive should be considered. The 2-butanone results may be attributable to the site and history of positive results in this location. Both MW-901 and MW-902 had positive results in September 1988 and results that were rejected in December 1988.
20. Table 3-1: Sampling for TAL inorganics should be considered for MW-903 if the results from this well will be compared to the upgradient (north) wells or used as background for septic system wells.
21. Page 3-4: The table only includes five SW/SED locations, not six, as stated in the text. A background location, as described in the text, should be collected.
22. Page 3-5: Consider including the versions of Tables 7-1 and 7-2 that are applicable.
23. Page 3-6: The example of turbidity as an intractable problem is poor. Several alternatives are possible if highly turbid samples present analytical problems.
24. The limits listed for inorganics in Table 7-2 (Long Term Monitoring QAPjP) should clearly state whether these are instrument detection limits or CRDLs. The table does not include sediment limits for VOCs, SVOCs, or pesticides.