



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

August 3, 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 Workplan Site 9 Neptune Drive Disposal Site
NAS Brunswick
June 1994

Dear Fred:

The United States Environmental Protection Agency (EPA) has reviewed the above referenced document. The EPA's comments are found in Attachment I of this letter.

The EPA would like to clarify that although this workplan does not cover or only briefly references additional work in the vicinity of Site 9 (i.e., Neptune Drive reconstruction and NEX monitoring), the Navy should ensure that any relevant additional information be incorporated into the forthcoming investigation report.

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

Attachment

- cc. Steve Mierzykowski/USFWS
- Nancy Beardsley/MEDEP
- Jim Caruthers/NASB
- Elizabeth Walter/ABB-ES (w/ disk)
- Susan Weddle/BASCE
- 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 Workplan Site 9 Neptune Drive Disposal Site dated June 1994.

1. Page 3-2, Figure 3-1: Either in the final workplan or the investigation report documenting the fieldwork, the EPA suggests that this figure should be expanded and revised to present existing monitoring wells and sampling locations.
2. Page 3-6, ¶ 1: This paragraph states that the new groundwater monitoring wells will complement the wells installed as part of the Naval Air Station investigation of the Naval Exchange (NEX) gas station. The relationship between these wells needs to be expanded upon, and Figure 3-1 should show the gas station and the associated wells.
3. Page 3-8, Figure 3-2: The figure should state that either a Bentonite Slurry Seal or a Bentonite Pellet Seal will be used.
4. Page 3-8, Figure 3-2: Notes J and K need to be reversed.
5. Page 3-11, Section 3.2.4 Soil and Groundwater Sampling: For groundwater sampling, Appendix A in the QAPP of the LTMP for Bldg 95, Sites 1 and 3, and the Eastern Plume needs to be cross-referenced. As a matter of technicality, the 900 series monitoring wells at Site 9 are part of the long-term monitoring program and the new wells are part of the additional investigations.
6. Page 3-13, ¶ 1: The text states that samples will be taken from the desired sampling depth. The text should be expanded to explain how the depth will be determined.
7. Page 4-1, Section 4.1: The listed analytical references are incorrect and inconsistent.
 - a) The reference to the 3/90 CLP SOW as ILM02.0 is incorrect and should be reference as OLM01.0. However, several updates of this method have been released to correct problems with this initial version. It is recommended that a version more recent than the 3/90 CLP SOW be utilized for organics analysis.
 - b) Does the reference to the October 1992 CLP SOW for volatile and PCB/pesticide analysis refer to the low concentration 10/92 CLP SOW?
 - c) Provide method references for analysis of soils for VOCs or PCB/pesticides.
 - d) Program summary contains incorrect references to CRQLs and CRDLs. CRDL only applies to inorganic analyses. CRQL only applies to organic analyses.
8. Page 4-2, Table 4-1:

- a) The table does not provide CRQLs, CRDLs or reporting limits for soil samples.
- b) The reference in the table to the inorganic 3/90 CLP SOW appears incorrect. Note that the CLP SOW methods require reporting inorganic results to the instrument detection limit (IDL) not just the CRDL which is listed in Table 4-1. The IDLs are laboratory and instrument specific. Due to this, IDLs cannot be readily listed in a table such as this. The text or table should indicate whether quantitation to the CRDL only will be required or whether the results will be reported to the IDL. By listing the CRDL only and with no reference to the IDL, it could be assumed that results would only be reported to the CRDL. It is recommended that results be reported down to the IDL with appropriate CLP qualifiers indicating results below the CRDL, but above the IDL.
- c) The references to the vinyl chloride, fuel oil, and gasoline analysis methods do not provide sufficient detail since none of these methods can be considered routine as many of the CLP SOW analyses. For non-routine analyses, it is recommended that the workplan should provide some general information concerning the methods. The reference to the vinyl chloride method as "SIM & MOD.601" appears to combine two distinctly different methods. Low level vinyl chloride can be detected by GC/MS in the selected ion monitoring (SIM) mode and also by the GC/ELCD Method 601. However, the methods are distinctly different with completely different technical and quality control requirements. The references to "4.1.2" and "4.2.1" in relation to fuel oil and gasoline analysis, respectively, are not clear. Petroleum analysis methods are not standardized and are performed in various ways using different instrumentation based on the goals of the analysis, intended use of the data, and DQO level. Please provide complete references and additional detail of these methods.

- 9. Page 4-3, Section 4.2 Data Quality Objectives: The listing of DQOs Level A and D do not appear to include the low level vinyl chloride, fuel oil, or gasoline analyses included in Table 4-1 since the Level D definition specifies "USEPA CLP methods." Since no CLP methods are available for these analyses, the appropriate DQO level for these non-CLP methods should be included in this discussion.