

**RESPONSE TO COMMENTS FROM
U.S. ENVIRONMENTAL PROTECTION AGENCY
ON DRAFT REVISED LONG TERM MONITORING PLAN FOR
SITE 9: NEPTUNE DRIVE DISPOSAL SITE
AT NAVAL AIR STATION, BRUNSWICK, MAINE**

COMMENTOR: Michael Barry

DATE RECEIVED: 17 MAY 1999

GENERAL COMMENTS

1. The draft revised Long-Term Monitoring Plan (LTMP) is concise and comprehensive. The EPA concurs in general with the Navy's proposed revision; we have the following specific comments and concerns.

Response—No response required.

2. VOC sampling monitoring well MW-NASB-081 should be retained in the LTMP because 1,1-DCE was detected in it the last time it was sampled, on Monitoring Event 12 in July 1998. All VOCs which will later decay to vinyl chloride at levels greater than the MEG should be monitored to assess natural attenuation performance as accurately as possible. This would affect the LTMP in Section 3.1.1 and on Tables 1-1 and 3-1.

Response—The Monitoring Event 12 summary table was in error; 1,1-DCE was not detected in this well, as is correctly noted in the 1998 Annual Report summary table. Therefore, the Navy does not feel that additional sampling of this well would be necessary. This is also noted in response to EPA Comment No. 4a. for the Draft 1998 Annual Report.

3. We recommend adding the approximate location of the Building 201 septic system to Figure 1-2, just as are the ash landfill and incinerator locations. The septic system location adds information to the understanding of VOCs at site 9 as it was a probable source of VOCs in the past and appears to have been directly upgradient of MW-NASB-76.

Response—The approximate location of the Building 201 septic system has been added to Figure 1-2.

4. *Analytical Methods*—Several modified methods to reach near the MEG of 0.15 ppb were discussed by the RAB and were identified as acceptable to EPA in our letter of 6 May 1999. These methods and the reason for including them should be identified in the LTMP in Sections 1.4.5 and 3.3 and in the QAPP on Tables 5-1 and 5-2.

Response—The issue of vinyl chloride detection levels was discussed during the 4 May 1999 Technical Meeting. It was decided that Method 8260B modified for SIM would be used when a well is to be deleted from the sampling program. The method will not be used at a well where vinyl chloride is known to be above 2 • g/L, as established using EPA Method 8260B. The following text has been added as the second paragraph of Section 1.4.5 and the last paragraph of Section 3.3 of the LTMP:

If a monitoring well is being considered for deletion from the sampling program for volatile organic compounds, ground-water samples from that well will be analyzed using Method 8260B modified for SIM for two sampling rounds, in order to achieve the detection limit of 0.15 • g/L (State MEG for vinyl chloride). This method will not be used at a well where vinyl chloride is known to be above 2 • g/L, as established using EPA Method 8260B.

Method 8260B modified for SIM has been added to Table 5-1 of the QAPP under the Organics section. Footnote f on Table 5-2 of the QAPP has been revised to include the above information (see response to MEDEP Comment No. 19).

SPECIFIC COMMENTS

5. ***Low Flow Purging Rate; Appendix A, Page A-3***—Because of the low VOC concentrations at Site 9, the purge rate range of 0.2-0.5 liters/minute should be strictly observed.

Response—A purge rate of 0.2-0.5 liters/minute will be strictly observed at Site 9. It should be noted that wells at Site 9 are routinely sampled at a rate of 0.1-0.2 liters/minute.

6. ***Reporting Limits and MDL for Vinyl Chloride; QAPP Section 5.5, Page 5-3 and Table 5-2***—VOC detections, especially those for vinyl chloride, 1,2-DCE, and 1,1-DCA between the MDL and reporting limit should be reported with a J designator. Is it also possible to report non-detects of vinyl chloride at less than the MDL with a J designator rather than less than the reporting limit. This would minimize the amount of modified 8260B SIM analyses required.

Response—The analytical laboratory uses the J designator only for detections that are greater than the Method Detection Limit and lower than the Practical Quantitation Limit. The laboratory will not report non-detects of vinyl chloride below the MDL with a J designator.

This issue is likely to be resolved by using Method 8260B modified for SIM if the concentration of vinyl chloride is suspected to be less than 2 • g/L, as noted in the Response to Comment No. 4.