

Lepage Environmental Services, Inc.

P. O. Box 1195 • Auburn, Maine 04211-1195 • 207-777-1049 • Fax: 207-777-1370

May 6, 2003

Mr. Orlando J. Monaco
Code EV21 LM
Naval Facilities Engineering Command, EFANE
10 Industrial Highway, Mail Stop #82
Lester, PA 19113-2090

Subject: Review of the April 2003 Draft *Work Plan for Site 9 Direct-Push Investigation*

Dear Mr. Monaco:

The following comments on the April 2003 Draft *Work Plan for Site 9 Direct-Push Investigation* are submitted on behalf of the Brunswick Area Citizens for a Safe Environment (BACSE):

1. General Comment. BACSE concurs with the majority of the Maine Department of Environmental Protection's (MEDEP) May 1, 2003, comments on the Work Plan and will not repeat the rest of the agency's comments below. With regard to MEDEP Comment Number 1, BACSE agrees that detection of contaminant concentrations in excess of MCLs or MEGs at any of the direct-push locations may result in additional subsurface investigations being needed. However, BACSE also believes that any detection of contaminants, regardless of concentration, should be considered when evaluating the need for any additional investigation. This is particularly important because several direct-push locations are outside the current Site 9 boundary and the limit of Site 9 Institutional Controls as documented in the September 1999 *Record of Decision for Site 9*.

2. Page 2, Section 1.2 Work Plan Organization. "*Field activities and procedures specific to Site 9 are detailed in Section 2. Field activities and procedures specific to the ash landfill are detailed in Section 3.*"

These statements imply that the ash landfill is not part of Site 9. BACSE suggests that the sentences be rewritten as follows: "Field activities and procedures specific to the investigation of volatile organic compounds in Site 9 groundwater are described in Section 2. Field activities and procedures specific to the Site 9 ash landfill are described in Section 3." Similar revisions should also be made to the opening sentences in Sections 2 and 3.

3. Page 2, Section 1.2 Work Plan Organization. *“Responses to regulator’s comments on the Draft Work Plan are provided in Appendix A.”*

The sentence should be revised to indicate that responses to BACSE’s comments are also included in Appendix A.

4. Page 13, Section 3 Field Activities and Procedures for Barrack Buildings 218 and 219.

The opening paragraph and bullets in Section 3 state that “up to 10” direct-push borings will be installed to investigate the extent of the ash landfill. However, the first sentence in Section 3.1 states that “A total of 10” soil borings will be installed. The criteria for deciding to install fewer than 10 borings should be added to the text, or the text should be revised to consistently state that 10 borings will be installed.

5. Page 14, Section 3.1 Soil Boring Program. *“Up to 2 soil samples will be collected from 5 of the 10 soil borings to determine extent of the ash landfill, for a total of 10 samples.”*

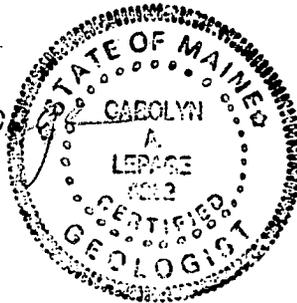
The criteria for selecting samples for laboratory analysis should be added to the text and the text should be revised so it is clear of “a total of” or “a maximum of” 10 samples will be collected.

In closing, BACSE appreciates the opportunity to participate in the April 24, 2003, technical meeting. The Site 9 discussions and site visit were very helpful in resolving questions and reaching a common understanding. Please do not hesitate to call me if you have any questions on the comments above.

Sincerely,



Carolyn A. Lepage, C.G.
President



cc: Loukie Lofchie, BACSE
Tom Fusco, BACSE
Ed Benedikt, BACSE
Anthony Williams, NASB
Claudia Sait, MEDEP
Christine Williams, EPA
Al Easterday, EA ES&T