



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI

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GOVERNOR

COMMISSIONER

September 13, 2005

Mr. Orlando Monaco
Department of Navy
Engineering Field Activity-Northeast
Code 1823/OM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Response to Comment-Site 9 Soil Removal Action
Naval Air Station, Brunswick

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP) has reviewed the response to comments sent via email from Frank Cellucci on September 02, 2005. Based on that review MEDEP has the following outstanding comments and issues.

General Comments:

1. Please resubmit the Response to Comments (RTC) on the letterhead of the Navy or the contractor and addressed them to Christine Williams of EPA or Claudia Sait of MEDEP, as appropriate. The letter also needs to state that the RTC are being submitted on the behalf of the Navy and be signed by either the contractor or by you.
2. The final workplan must be submitted for review prior to initiating the work so that MEDEP can confirm that the approved revisions have been incorporated into the workplan.
3. Only one figure (Figure 4.a) has been submitted which depicts the proposed confirmation sampling locations. All of the figures need to be submitted for review by the agencies.
4. Please add an objective for the removal action. MEDEP suggests the following language: *"The objective of the removal action is to removal all ash and debris from the Site 9 Ash Landfill/Debris Dump as identified in the draft Direct Push Groundwater and Ash Landfill/Dump Area Delineation Investigation Summary Report for Site 9 (EA 2004) and as depicted on Figure [INSERT NUMBER]. Confirmation sampling will be performed after all visible ash and debris has been removed to ensure that cleanup standards have been achieved for unrestricted used."*
5. A table must be generated that combines the information in Table C and the new Table G (not submitted for review) so the regulators can compare the project action levels (i.e., Maine Maximum Exposure Guidelines (1992), Maximum Contaminant Level., Maine Remedial Action Guidelines and the Region IX PRGs/SSL) with the proposed detection limits and the reporting/quantitation limit. If the detection limit cannot be met then it must be noted (e.g vinyl chloride in groundwater). A cursory review of Table C indicates that not all the metals

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and compounds listed in the MEGs are included in the table and some of the listed ones are incorrect.

RTC-3: It is unclear where the treated water will be discharged. Please clarify. Please keep in mind if the treated water is discharged to any surface water body it must meet the Ambient Water Quality Criteria (AWQCs), if it is discharged to the ground it must meet the Maine Maximum Exposure Guidelines (MEGs).

RTC 7: Please change the reference from the Maine Primary Drinking Water Standards to the MEGs. (Also see RTC 3 above regarding the AWQCs.)

Also regarding Table C-1, the following must be reviewed and revised as necessary. (Also see follow up comment 5 above.)

- Detection Limits must be much lower than the project action level. The reporting limit/quantitation limit should be one third the action level and the detection limit should be one third the report/quantitation limit.
- Please note that TPH cannot be used but the Diesel Range Organics and Gasoline Range Organics (Maine Health and Environmental Testing Laboratory Method 4.1.25 and Method 4.2.17 respectively) must be utilized.

RTC 9 See follow up comment for RTC 3 above. Be sure to change TPH to DRO and GRO.

RTC 13: The objective for this removal action should be the removal of all visual ash and debris with confirmatory sampling of the sidewalls and underlying soils. (See follow up general comment 4 above.) MEDEP still recommends that VOC's in soils be remediated to non detect in order to expedite the natural attenuation of groundwater thereby reducing long term monitoring cost.

Thank you for the opportunity to review this report. If you have any questions or comments please call me at (207) 287-7713 or email me at claudia.b.sait@maine.gov.

Respectfully,



Claudia Sait
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Bureau of Remediation & Waste Management

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