

# Lepage Environmental Services, Inc.

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October 11, 2005

Mr. Orlando J. Monaco  
Code EV21 LM  
Department of the Navy, EFANE  
10 Industrial Highway, Mail Stop 82  
Lester, PA 19113-2090

Subject: September 2005 Draft Final *Long-Term Monitoring Plan for Site 9 (Neptune Drive Disposal Site)*

Dear Mr. Monaco:

The following comments on the September 2005 Draft Final *Long-Term Monitoring Plan for Site 9 (Neptune Drive Disposal Site)* (the Site 9 LTMP) are submitted on behalf of the Brunswick Area Citizens for a Safe Environment (BACSE):

- 1. General Comment.** As discussed in a telephone conversation with Gina Calderone of EA ES&T on October 6, 2005, this review was based on a comparison of the Site 9 LTMP with the January 2005 Final *Long-Term Monitoring Plan for Site 7* and previous comments and responses on the December 2003 Draft *Long-Term Monitoring Plan for Site 7*. The Site 7 LTMP was the first of the series of site-specific long-term monitoring plans revisions that began in 2003. Therefore, the assumption on BACSE's part was that changes that were made to the Site 7 plan format and "boilerplate" language would be carried over to subsequent revisions for the other sites, including the Site 9 LTMP.
- 2. Remedial Action Objectives.** In response to a USEPA comment (comment number 6 dated January 6, 2004), the Remedial Action Objectives (RAOs) from the ROD were added to page 1-3 of the Site 7 LTMP. The RAOs for Site 9 should also be added to the Site 9 LTMP.
- 3. Conceptual Model.** As both USEPA and BACSE had commented on the draft Site 7 LTMP, the Monitoring Plan would be improved by adding a description of the conceptual model for the presence of, and factors likely to be controlling transport of the contaminants of concern. The Site 9 LTMP would also benefit with the addition of a brief description of the conditions affecting natural attenuation of the contaminants of concern at the site.

- 4. Page 1-1, Section I. INTRODUCTION.** In the second sentence, NAS Brunswick is described as an active base. This should be revised to reflect the likely closure of the base. In the fifth sentence, Site 9 is described of consisting of 2 areas. According to page 2-2 of the Record of Decision (ROD), Site 9 consists of three areas. The sixth sentence should contain a citation to the September 1999 ROD.
- 5. Page 1-2, Section 1.1 PURPOSE AND SCOPE.** Why are the goals of the Site 9 LTMP different from the goals on pages 2-11 and 2-39 of the September 1999 Site 9 ROD? Please reconcile.
- 6. Page 1-3, Section 1.2.1 Former Incinerator and Ash Landfill/Dump Area.** The last sentence in the section should be updated to reflect the current status of the buildings (formerly located in this area of Site 9).
- 7. Page 1-7, Section 1.3.4 Long-Term Monitoring.** The transition from quarterly to tri-annual sampling is documented in the text. Please add documentation regarding when the change from tri-annual to biannual took place. This comment also applies to Section 1.4.2 on page 1-8.
- 8. Figures 1-2 and 1-3.** These figures should be updated, either by symbol or a notation, which buildings have been removed from the site.
- 9. Page 2-1, Section 2 REGULATORY FRAMEWORK.** The first sentence should be revised to state that institutional controls are also part of the selected remedy. The sentence regarding the five-year review should be revised to indicate that the second five-year review has been completed. A reference citation should also be added to the text and the reference added to the reference list. The second paragraph should include reference to the second Proposed Plan from July 1999.
- 10. Page 3-4, Section 3.4 PROGRAM MODIFICATIONS.** Why wasn't the text from Section 3.5 on page 3-4 of the Site 7 LTMP used? Why is this section so different?
- 11. Page 3-5, Section 3.4.2 Laboratory Quality Assurance and Quality Control.** The text from Section 3.5.2 on page 3-5 of the Site 7 LTMP regarding method detection limit/resampling and holding times should be added here.
- 12. Page 3-5, Section 3.4.3 Corrective Measures.** This section should be revised so that it reads the same as Section 3.5.3 of the Site 7 LTMP. (Please see BACSE's comment number 11, dated January 22, 2004).

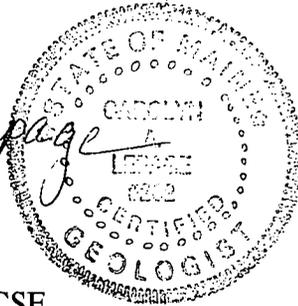
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Please do not hesitate to call me if you have any questions.

Sincerely,



Carolyn A. Lepage, C.G.  
President



cc: Loukie Lofchie, BACSE  
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