



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

December 15, 2005

Lonnie Monaco (orlando.monaco@navy.mil)
Engineering Field Activity Northeast
Naval Facilities Engineering Command
North Loop and American Way,
Building G, Code 182
Lester, PA 19113-2090

Re: *Monitoring Event 26 (April 2005) Report for Site 9, Ash Landfill/Dump Area, dated November 2005 for the Naval Air Station Brunswick, Maine*

Dear Mr. Monaco:

Pursuant to § 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency has reviewed the referenced document and comments are below.

GENERAL COMMENTS

1. In a letter dated November 28, 2005, EPA requested a temporary change to the LTMP for the fall 2005 event and the two events in 2006. Monitoring well locations 71, 72, 74, 75, & 76 must be sampled by the low flow method to determine a representative result for acetone and MEK in the groundwater near the impoundment pond. If the Navy would prefer to include other wells at or around site 9 in this change, that would also be acceptable. EPA looks forward to working with the Navy to determine the origin of the acetone and MEK in the impoundment pond and believes this temporary LTMP modification request is a first step.
2. The Report indicates that the laboratory analytical data was reviewed and the laboratory analytical review is included in Appendix E. However, there is no indication that the field water quality parameter data (e.g., pH, dissolved oxygen, conductivity, temperature, Eh (ORP), and turbidity) were reviewed. If this field data are to be used to assess environmental conditions at the site then the field data review and the field calibration information needs to be attached to the Report. This general comment should be noted and the information included in all monitoring event reports where field data are used to assess environmental conditions (MNA or a similar evaluation) at the site.
3. Event 26 sampling and analysis is complete, carefully executed, and documented fully. Results are generally consistent with those from recent past events. Two "spikes" seen in Event 25 appear to have been brief transients, and not causes for concern:
 - Vinyl chloride in groundwater at MW-NASB-069 rose sharply from ~15 micrograms per liter (estimated from plot, Appendix C) in ME24 (Spring 2004) to 71.4 micrograms per liter in ME25 (Fall 2004), but dropped back again to 32 micrograms per liter (deep diffusion sample) in ME26 (Spring 2005). This continues what appears to be a general pattern of higher concentrations in the Fall and lower concentrations in the Spring.

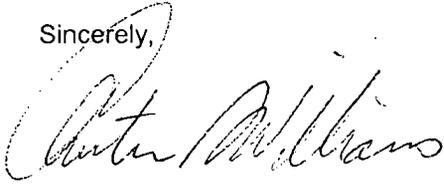
- A first-time appearance of benzene was detected at MW-NASB-080 in ME25 (Fall 2004) at 13 micrograms per liter, but benzene was not detected (<1 microgram per liter) in ME26 (Spring 2005).
4. The recommendations to install a new monitoring well near S9-B10, as well as to replace MW-NASB-076 with a deeper screen near S9-B8, are supported. As noted in the text (p. 2-2, sec. 2.3.1), these activities can reasonably be executed at the same time that wells in the fill area are replaced following the soil removal.

SPECIFIC COMMENTS

5. **Section 1.1 and figure 1-3.** Stream Gauge #2 was damaged/submerged according to the figure, however there is no discussion of this in section 1.1. Please reconcile/clarify the text/figure.
6. **Section 1.5 Quality Assurance and Quality Control.** This Section should include any problems discovered in the review of the data. An example would be the reason(s) why the 1,1,2,2-Tetrachloroethane data were rejected (Appendix B, Laboratory Analytical Data Summary Tables).
7. **p. 2-3, Sec. 2.3.1:** The table provided on pages 2-3 and 2-4 includes small bar charts showing trends for each analyte over the past ten monitoring events. It appears that at least some of these bar charts were not updated with data for ME26. For example, it is noted that vinyl chloride at MW-NASB-069 (deep) has varied from about 15 ppb in ME24 to 71.4 ppb in ME25 to 32 ppb in the present reporting period (ME26). The corresponding bar chart on p. 2-3 shows a sharp increase from the next-to-last to the last bars; i.e., it appears that the ME26 result is not shown. Please check the bar charts for completeness and accuracy.
8. **p. 3-1, Sec. 3.1:** The third bullet in this section states that LTM data from MW-NASB-069, -070, and -079 "... indicate no significant impacts from the inactive landfill." and further notes that elevated inorganics and/or SVOCs are not observed. However, MW-NASB-069 continues to see elevated vinyl chloride (above the MEG and MCL). Is the vinyl chloride not regarded as originating in the fill? This seems to contradict the recent site 9 Direct Push sampling results that found vinyl chloride in the soils. Please clarify.
9. **Appendix B Laboratory Analytical Data Summary Tables.** Table B-1 indicates that samples were collected using diffusion samplers for the analyses of acetone and 2-butanone. However, the diffusion samplers are not designed to collect samples for these analyses. Therefore, the acetone and 2-butanone data needs to be qualified as rejected "R". Consult the *USGS User's Guide for Polyethylene-Based Passive Diffusion Bag Samplers to Obtain Volatile Organic Compound Concentrations in Wells*, 2001, for the list the contaminants that can be collected using this sampling method.
10. Table B-2 and Table B-3 indicate that SVOCs and Metals samples were collected using diffusion samplers. Is this a typo? The diffusion samplers which are described in the above USGS User Guide are not designed to collect samples for SVOCs and Metal analyses.
11. Sample MW-NASB-069 (Dup) appears to be a duplicate of sample MW-NASB-069. However, the sampling methods are different. Duplicate samples are collected using the same sampling method. Are the sampling methods listed correct? If methods are correct, explain how this data is to be used.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Williams". The signature is fluid and cursive, with a large initial "C" and "W".

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc. Claudia Sait/ME DEP (claudia.b.sait@state.me.us)
Ed Benedikt/BACSE e-mail only (rbenedik@zwi.net)
Tom Fusco/BACSE e-mail only (tfusco@zwi.net)
Carolyn LePage/LePage Environmental (clepagegeo@aol.com)
Peter Golonka/Gannet-Fleming e-mail only (pgolonka@gfnet.com)
Lisa Joy/NASB (lisa.joy@navy.mil)
Charles Porfert via e-mail only (porfert.charlie@epa.gov)