



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

June 1, 2006

Orlando Monaco (orlando.monaco@navy.mil)
Dept of the Navy, BRAC PMO Northeast
Code 5090 BPMO NE/LM
4911 South Broad St
Philadelphia, PA 19112-1303

Re: Site 9 Neptune Drive Disposal Site, Monitoring Event 27 (September 2005) Report, dated April 2006, 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 subject document and comments are below:

GENERAL COMMENTS:

1. The Report indicates that the laboratory analytical data was reviewed and the laboratory analytical review is included in the Appendix. 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.
2. The Report should include a summary of the data validation, rather than a generic statement that the data is usable.
3. Results from ME 27 are generally routine, with no surprises. It is noted that monitoring at Site 9 is in transition due to a number of factors. First, the soil removal in the vicinity of the former ash disposal area has resulted in the decommissioning of a number of monitoring wells, and replacements will be installed following completion of the removal. Second, updates to the current network are planned, independent of the need to replace destroyed wells; a new monitoring well is planned for the southwest portion of the site (near boring B10), and a replacement for MW-NASB-076 is planned, as well. Finally, impacts to the Upper Impoundment Pond, possibly linked to discharge of contaminated groundwater, were observed in Fall 2005, and diesel-range organics (DRO) were detected at MW-NASB-075 (shallow well upgradient of the pond). ME27 precedes an extraordinary period of high rainfall (and, presumably, groundwater recharge) in October 2005, which, it has been speculated, may have mobilized contamination within the system.

4. Monitoring well MW-NASB-069 (which was expected to be destroyed in the soil removal action) remains the "hotspot" for Site 9 in ME 27. It is the only well exhibiting exceedances (vinyl chloride at 34/25 ppb (shallow/deep)). Concentrations of VC and 1,2-DCE at this well are consistent with a general declining trend observed since 2001 (with the exception of "spikes" in the Spring 2002 and Fall 2004 events).
5. Because of the detection of DRO at MW-NASB-075 in Fall 2005, DRO should be added to the analyte list for all wells at Site 9 for a minimum of one monitoring event, to be followed by a reassessment. This will support interpretation of the source(s) and transport pathway(s) for the DRO.
6. It is recommended that the laboratory analytical summary table for VOCs (currently included as a pdf file on the supplemental CD as Table B-1) be printed in the Tables section of the report. Given that VOCs are the principal driver for the monitoring program, it would be useful to offer readers a quick, but complete, assessment of the VOC analytical results.
7. It is interesting to note that manganese at MW-NASB-069 shows a systematic decline in concentrations from about 0.7 mg/L in early 2000 to about 0.4 mg/L by early 2002, and has remained fairly stable since that time. This suggests a general shift toward more oxidizing conditions, perhaps accompanying the decline in organic contaminants. ORP was measured at 100.8 mV in ME 27.

Specific Comments

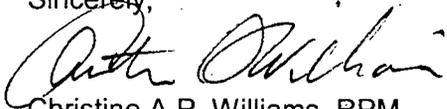
8. **p. 1-2, sec. 1.4:** Additional surface water/sediment samples should be taken at the eastern end of the impoundment pond where it has been noted that a possible additional landfill leachate breakout is occurring. These samples should be analyzed for the VOC/SVOC and Metal analysis that the wells in the center of the landfill have been analyzed for.
9. **p. 2-3, sec. 2.3.1:** A figure is included that shows historical trends for MW-NASB-069. This may be a useful graphic, as it shows the only exceedances detected in the present network. However, neither the text nor the figure itself indicates what is plotted here. Are the two sets of data for total VOCs (black diamonds) and vinyl chloride (green squares)? Are these data for the deep diffusion sampler (at least in more recent events)? Please clarify in text and/or the figure.
10. **p. 2-3, sec. 2.3.1:** The text directs the reader to various screening sampling locations for reference (e.g., S9-B8 and -B9, B10, etc.). However, these locations are not shown on any of the maps supplied with the report. It would be useful to display the historical boring locations on at least one map, along with the monitoring well locations.
11. **p. 2-4, sec. 2.3.1:** No discussion of the results of neither the metals analysis nor the SVOC analysis was found. Please include.
12. **p. 3-1, sec. 3.1:** The third bullet states that there are "... no significant impacts

from the inactive landfill," and supports that conclusion with the observation that, "Concentrations of inorganics and semivolatile organic compounds are below applicable State MEG and Federal MCL guidance." This seems to imply that the VOCs, which do show exceedances (VC at MW-NASB-069) are believed to have no relationship to the on-site waste. It is not clear that this has been established. It might be added here for completeness and objectivity that VOC impacts of uncertain origin are detected downgradient of the fill.

13. Page 3-3, Section 3.2 Recommendations. The first bullet indicates that sodium bisulfate will be continued to be used as a preservative for the sediment samples which will be analyzed for VOCs. If acetone is a concern at this site, the VOC samples should not be preserved with sodium bisulfate. Consult EPA Method 5035A for other ways to preserve the sample such as freezing the sample.
14. Appendix E Analytical Data Quality Review. The Analytical Data Quality Summary form lists for the Overall Evaluation of Data (VOCs and metals analyses) as "M". This means "data were qualified due to major/systemic MPC [measurement performance criteria] exceedances". Trip sediment blank was not analyzed by the laboratory. Explain what corrective actions will be taken to prevent the above from occurring in future sampling events. Please include a summary of the review in the text of the report.

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

Sincerely,



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

cc. Claudia Sait/ME DEP (claudia.b.sait@maine.gov)
Charles Porfert, EPA e-mail only (porfert.charlie@epa.gov)
Ed Benedikt/BASCE e-mail only (rbenedik@gwi.net)
Tom Fusco/BACSE e-mail only (tfusco@gwi.net)
Carolyn LePage/LePage Environmental (calepage@adelphia.net)
Peter Golonka/Gannet-Fleming e-mail only (pgolonka@gfnet.com)
Lisa Joy/NASB (lisa.joy@navy.mil)
Darren Gainer/ECC e-mail only (dgainer@ecc.net)
Al Easterday/ECC e-mail only (aeasterday@ecc.net)