



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

January 18, 2007

Orlando Monaco  
Dept of the Navy, BRAC PMO Northeast  
Code 5090 BPMO NE/LM  
4911 South Broad St  
Philadelphia, PA 19112-1303

**Re: *Draft Soil Sampling Corrective Action Plan and Letter Work Plan for Site 9, Ash Landfill/Dump Area, dated December 4, 2006, received December 27, 2006 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 (EPA) has reviewed the subject document and comments are below.

1. EPA agrees with the Maine Department of Environmental Protection's comments dated January 10, 2007 and will not repeat them. Please copy EPA on the Navy's responses to their comments.
2. EPA believes that the plan for the future for site 9 is to do some investigative work in and south of the road to determine nature and extent (I expect this work plan in the beginning of February 2007). A report on this investigation would then be called either a supplemental remedial investigation report (RI) or something similar. Then using this information the Navy would issue a Focused feasibility study (FS), a proposed plan (PP), and finally an amendment to the record of decision (ROD) dated September 1999. The ROD amendment would be for adding the soils to the OU and to propose additional work beyond what is already contracted for currently. The current excavation contract only includes the north side of the road and EPA has indicated that this contract end date would be a good breaking point for the new work that may be needed in and south of the road.

Please provide a schedule under the FFA to add this additional or supplemental RI, a focused FS, a PP, and a ROD amendment within 45 days of receipt of this letter.

3. Please clarify if the Navy intends to sample the site under each of the piles that is removed to ensure no waste has contaminated the site. The analysis required would be the same as required

for backfill (to also include pesticides as requested by the State).

4. Please clarify if the same lab will be analyzing the samples as has provided the lab SOP for compositing the VOC aliquots. Please attach the lab SOP to the final work plan.
5. Please clarify in the text that the Navy intends to composite and send out for total VOC analysis, TCLP analysis (SVOC, Pest. & metals), and PCB analysis soil samples from each of the 500 ton waste (either special or hazardous) piles to be disposed of.
6. Page 4: The third bullet under Methodology for Composite Sampling should be clarified. The laboratory will need to composite the VOC samples without compromising each sample. It is not clear from the text description how this will be done. The medium being sampled is soil so it is also not clear how a 50 microgram aliquot of soil (is that what the text intended to state?) can be collected from each individual sample with a syringe.
7. Page 5: Regarding the last paragraph under Methodology for Composite Sampling, it is not appropriate to calculate a Resultant PQL Using the 20X rule as shown in the table. The appropriate procedure for comparing the analytical results to the TCLP requirements is to divide the 8260B analytical result for each toxic analyte by 20 (which defines the maximum leachable concentration for that analyte) and compare that result to the TCLP concentration limit. If the analytical result divided by 20 is less than the TCLP concentration limit, then the waste is not hazardous for that constituent. Please clarify the text. In addition, what is the Navy's plan for waste characterization if the result is "close to" the TCLP concentration?

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  
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Lisa Joy/NASB (e-mail only)  
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