



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI

DAVID P. LITTELL

GOVERNOR

COMMISSIONER

February 22, 2007

Mr. Orlando Monaco
Department of Navy
Base Realignment and Closure
Program Management Office-Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Site 9-Response to Comments for the Proposed Soil Sampling Corrective Action Plan & Letter Work Plan

Dear Mr. Monaco:

Pursuant to Section VI of the Naval Air Station, Brunswick, Maine Federal Facility Agreement (Oct 1990), as amended, the Maine Department of Environmental Protection (MEDEP) has reviewed the Navy's responses (undated, received via email on February 15, 2007) to MEDEP's comments for the Proposed Soil Sampling Corrective Action Plan and Letter Work Plan, Site 9 Soil Removal Action, dated January 10, 2007. Based on that review MEDEP has the following outstanding comments and issues. For your convenience MEDEP has reused the original numbering system. Any RTC not addressed below is acceptable.

1. It is still not clear whether material to be excavated from the ash landfill will be staged in 500 ton piles for sampling or staged in larger piles that will be segmented for sampling as proposed in the original workplan. It is MEDEP's expectation that any material excavated will be staged in 500 ton piles for sampling. Therefore, it needs to be stated very clearly in the corrective action plan that both the excavated material in piles P6, P7, P8, and the unnamed ash pile will be broken into 500 ton piles for sampling and any future materials excavated from Site 9 will also be staged in 500 ton piles for sampling.
4. Para 1: "The following represents OAK's revision to the Letter Work Plan (LWP) to address the quality and reliability of chemical data that has been collected to date on the project."

MEDEP's initial comment: a.) MEDEP is unfamiliar with the above referenced Letter Work Plan. Does Oak mean the Final Work Plan and Site Safety and Health Plan (Oct 2005)? Please specify.

Navy's Response: *The document dated December 4, 2006 is the Letter Work Plan (LWP). A heading, entitled "Letter Work Plan" has been added following the first paragraph, and above the first subsection.*

MEDEP's follow up comment: Please review the response as the answer is impossible since the corrective workplan is referencing itself. (MEDEP's initial comment was regarding the December 4, 2006 document.) Therefore the revisions must be to the Final Work Plan and Site Safety and Health Plan (Oct 2005) or a version of the workplan MEDEP has not seen. It might be simplest to revise the statement. MEDEP suggests the following language

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or something similar: *"The following represents Oak's revisions to the Final Work Plan and Site Safety and Health Plan (Oct 2005) to address the handling and sampling of existing excavated and stockpiled materials and construction water and any materials to be excavated from the ash landfill."*

Please contact me at (207) 287-7713 or claudia.b.sait@maine.gov, if you have any questions or comments.

Respectfully,

A handwritten signature in cursive script, appearing to read "Claudia Sait".

Claudia Sait
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