



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

March 28, 2007

Orlando Monaco
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, Draft Direct Push Work Plan for Site 9 Ash Delineation and Investigations at Building 201 Area of concern and Irrigated Playing Fields, dated February 2007, 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:

1. **p.1, sec. 1:** typo "Response the regulator comments" add "to" in the 4th sentence
2. **p.2, sec. 2 & 2.1:** How will the "presence of ash" be determined? Visually or through chemical analysis?
3. **p. 2, sec. 2.1:** The Work Plan indicates that 10 DP borings will be advanced in the neighborhood of Neptune Drive to attempt to delineate the extent of the ash layer that was still present when excavation was halted at its southern extreme. Up to 20 additional DP borings are allocated in the event that the ash is detected, but not bounded, by the initial 10 holes. It is noted that Figure 4 shows 15 boring locations. It is not clear if this is only intended to be "schematic" (i.e., showing only the general concept) or "exact." If the latter, it is not clear which ten of the locations shown are intended as initial targets. Also, please elaborate on the process envisioned for continuing with (and locating) additional borings after the initial ten. Is the intent to continue with up to 30 borings in a single mobilization, or will there be an interim step of reporting results from the initial 10 borings? Will regulators have an opportunity to discuss the locations of the additional borings, if such are indicated?
4. **p. 3, sec. 2.4, fourth bullet:** The Work Plan indicates that soil samples, if collected, will be analyzed for SVOCs and TAL metals by TCLP. Because site groundwater in this area (e.g., at MW-NASB-069) has shown detections of chlorinated solvents (cis-1,2-DCE, VC), and their origin is somewhat ambiguous, it is recommended that soil samples be analyzed for VOCs, as well. This may provide further insight into the nature of the CVOCs in site groundwater (e.g., are they associated with the fill?).
5. **p. 3, sec. 2.4, fourth bullet:** please reference the QAPP that will be used

6. **Figure 4:** please include the outline of the current excavation.
7. **p. 5, sec. 3.2:** *typo:* Please note that the reader is referred to Figure 4 rather than to Figure 5 for the direct-push boring locations.
8. **p. 5, sec. 3.2 and Fig. 5:** Please provide the rationale for the proposed boring locations. It would appear that the working hypothesis is that the fuel compounds detected in groundwater and in the pond may have been released somewhere in close proximity to the south side of Building 201. In that event, one or more of the six borings distributed in that area are likely to detect hydrocarbons in soil and/or groundwater. However, if the release was off another side of the building, or farther from the building, these locations may be too closely clustered to detect anything. In particular, if DROs were detected in groundwater at MW-NASB-076, it seems possible that the release was hydraulically upgradient of this point, and there is no boring coverage that is clearly upgradient. Most of the proposed borings are cross-gradient to the west of MW-NASB-076. Based on whatever constraints are available (e.g., DRO detections at MW-NASB-076 and detections in pond pore water, sheen on surface water, stressed vegetation, etc.), what is the relationship of the proposed boring locations to what is believed to be the most likely area of release?
9. Page 6 of 14, 3.3 Direct-Push Boring and Soil Sampling
Page 6 of 14, 3.4 Direct-Push Groundwater Sampling
Page 10 of 14, 5.1 Soil Boring Installation
Page 10 of 14, 5.2 Soil, Groundwater, and Pore Water Sampling

These Sections indicate that the soil and ground water samples will be collected using the Direct-Push sampling procedure and the samples will be analyzed using the State of Maine Modified Method for Determining Diesel Range Organics Method 4.1.25 and Method 8260B for the VOCs. The EPA Region 1's 1,4-Dioxane Method will be used for the water samples. However, the Work Plan does not include the site's action limits (e.g., clean-up levels), sampling procedures, the laboratory's analytical standard operating procedures, quality control information (field and lab), and how the data are to be reviewed nor does the Work Plan reference the Quality Assurance Project Plan for the Site. Please provide this information. Note if this information is in the Base-Wide Quality Assurance Project Plan for the Long-Term Monitoring Program (January 2006) then the document can be referenced for the information.

10. Page 6 of 14, 3.3 Direct-Push Boring and Soil Sampling

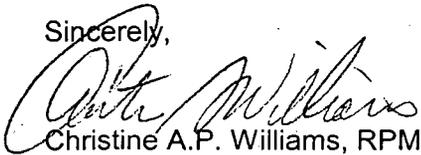
If the field PID head space analysis does not indicate the presence of organic vapor in the boring, will a sample be sent to the off-site laboratory to verify the PID results? It is unclear in the Section that a sample would be analyzed. EPA recommends that a sample be sent to the off-site laboratory for verification.

11. **Figure 5:** add the storm and sanitary utility lines associated with building 201 and the hobby shop. Also add the location of the restaurant grease trap and storage area and previous location of the hobby shop waste oil tank.

12. **p. 7, sec. 3.4:** The Work Plan does not specify the "low-flow" procedure for the groundwater sampling. It is recommended that field parameters be collected at the time of sampling, as these may provide important insight into the predominant transport processes at the site (e.g., indications of active degradation of hydrocarbons).
13. **p. 8, sec 3.5:** Since there were significant levels of acetone and MEK found in the pond by the ME DEP during a previous sampling round and the site 9 ROD was for VOCs in groundwater, please add VOCs to the pore water analysis.
14. **p. 9, sec 4.2:** Since the GWETS treats VOCs and the Navy's recent data has shown the levels to be non-detect, please provide the rationale for analyzing for both VOC and 1,4-dioxane.
15. **p. 9, sec. 4.3 and Fig. 6:** The Work Plan proposes four water-table samples to be collected from within the footprint of the playing field. What is the anticipated groundwater flow direction at this site, and how do the proposed DP locations relate to the flow? Based on the general location of the field, it seems likely that the flow is from NW to SE. If this is the case, the proposed DP locations near the NE, NW, and SW corners of the field have very little of the irrigated area lying upgradient. Only the SE corner is downgradient of a significant portion of the field. If it is believed that the flow is from NW to SE, it is recommended that the NE location be moved south (e.g., to the midpoint of the E side of the field), and the SW location be moved east (e.g., to the midpoint of the S side of the field), so that more of the irrigated area lies upgradient of these points. The NW point (as shown) will provide a comparison to groundwater that has received little recharge from the irrigation system.
16. **p. 11, sec. 5.3:** please reference the site-wide QAPP for groundwater and provide a QAPP for soils.
17. **p. 11, sec. 5.3.1.3:** please provide details as to what the rinsate blanks will be analyzed for.

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

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