



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

May 14, 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 Action Memo, Response to EPA Comments on the Draft Letter Work Plan, dated May 3, 2007, for the Naval Air Station, Brunswick, Maine*

Dear Mr. Monaco:

Pursuant to § 6 and § 11 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.

EPA concurs with the comments from MEDEP dated May 4, 2007, and attempted not to repeat their comments.

Action Memorandum

GENERAL COMMENTS

1. The Action Memorandum would benefit from inclusion of a Locus Plan that shows the entire area of Site 9. Figures 1 and 2 show only a portion of Site 9 and do not include features discussed in the text. Please edit the Action Memorandum accordingly.
2. The formatting of the various sections of the Action Memorandum should be revised for clarity. For example, as written all the paragraph headings from page 2 through "Endangerment Determination" on page 7 are subsections of the page 2 heading "Previous Investigations", which is not the intent. Please correct the paragraph headings.
3. The Action Memorandum format is in general compliance with the model format with a few exceptions, some of which are noted below:

The model format requires a discussion of the hazardous substances and pollutants released or threatened to be released as part of the site description.

In accordance with 40CFR 300.415 (i), the FFA, and EPA guidance OSWER directive 9360.3-01, the Navy must attain ARARS to the extent practicable in the performance of this removal action. Please add this information to the Action Memo.

A separate discussion is recommended, as required by the model format, to discuss expected changes in the situation should action be delayed or not taken.

4. In accordance with 40CFR 300.415 (b)(4), the FFA, and EPA guidance OSWER directive 9360.3-01, an EE/CA must be prepared for a non-time critical removal action. While EPA did receive the original EE/CA, EPA did not review it since the action was deemed to be a solid waste removal by virtue of the data available. Please provide a revised EE/CA for EPA review.

SPECIFIC COMMENTS

5. Page 1, Site Description: The first paragraph refers to two surface water impoundment ponds on the southern boundary of the site. The third paragraph refers to the groundwater flowing to the north toward the surface impoundment ponds. Are these statements consistent? Are there impoundment ponds on the northern and southern site boundaries? Please augment the site description to include the boundary descriptions for Site 9.
6. Page 7, Endangerment Determination: The language used has been modified from that required for Action Memoranda; the model language states: "... may present an imminent and substantial endangerment" Please revise the statement accordingly.

Response to Comment

Navy Response to EPA comment 1. The response refers to Figure 3 in the Letter Work Plan. There is no Figure 3 in this reviewer's copy of the Letter Work Plan. Does this refer to a new figure to be added to the planned revised letter work plan?

Navy Response to EPA comment 2. The schedule attached to the responses indicates approval of the revised Letter Work Plan by May 11, 2007. Because the revised Letter Work Plan has not been submitted to EPA as of May 11, 2007 this date will need to be changed. This is expected to impact all the proposed schedule dates. Please modify the schedule accordingly.

Navy Response to EPA comment 4. The response indicates that an evaluation of the impact of asphalt layers beneath the soil piles will be conducted during site closure assessment. Will the evaluation include sampling of the asphalt to allow comparison of the asphalt contaminants to the potential soil contaminants?

Navy Response to Comment #13: SSLs can be deleted from the table. However, if Navy

leaves contaminants at site 9 after the removal action that are above risk levels, PRGs will have to be developed during a risk assessment as part of the RI/FS process.

EPA has no other further comments on the revised Letter Workplan provided that all the revisions as approved are incorporated into the final Workplan.

If you have any questions, do not hesitate to call me at (617) 918-1384.

Sincerely,



Christine Williams
Remedial Project Manager
Federal Facility Section

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