

# Lepage Environmental Services, Inc.

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May 15, 2007

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

Subject: February 2007 Draft *Direct-Push Work Plan for Site 9 Ash Delineation and Investigations at Building 201 Area of Concern and Irrigated Playing Fields*

Dear Mr. Monaco:

The following comments regarding the February 2007 Draft *Direct-Push Work Plan for Site 9 Ash Delineation and Investigations at Building 201 Area of Concern and Irrigated Playing Fields* (prepared by ECC) are submitted on behalf of the Brunswick Area Citizens for a Safe Environment (BACSE).

- 1. General Comment.** BACSE concurs with comments submitted by the Maine Department of Environmental Protection (MEDEP) and the U. S. Environmental Protection Agency (EPA) dated April 11, 2007 and March 28, 2007, respectively.
- 2. Page 1, Section 1.** The first two sentences in the second paragraph duplicate the fourth and fifth sentences. Please correct.
- 3. Page 2, Section 2.** MEDEP comment number 7 states that the landfill may be following the former stream channel which continues to the southeast as an unnamed stream. The former stream channel appears on aerial photographs from the 1940s. Are there other features on aerial photographs from other years that would also help guide the investigations at Site 9? Do the proposed boring locations address MEDEP's observation? BACSE notes that Figure 5-1 of the February 1996 Draft *Site 9 Source Investigation Report* shows the trace of the former 40-inch drain pipe that trends from the northwest to the southeast, toward the unnamed stream. How does this feature relate to the former stream channel? The ash landfill? Contaminant migration pathways?

**4. Figure 4.** The trace of the former stream channel (MEDEP comment number 7) and the former 40-inch drainpipe shown on Figure 5-1 of the 1996 Draft *Site 9 Source Investigation Report* should be added to Figure 4.

**5. Page 5, Section 3.** MEDEP comment number 14 addresses an additional source of petroleum contamination observed at the impoundment pond. What followup action is the Navy considering for this additional source?

**6. Page 5, Section 3.** The 1990 Draft Final *Remedial Investigation Report* describes fuel-related and other volatile organic compound detections at Site 9. How were these and other historic data factored into the design of the investigation near Building 201? Of particular concern is the solvent burning area discussed on pages 11-21 and 11-23, and outlined on Figure 11-12 (page 11-22) of the RI report. The solvent burning area as described in the RI is based on the 1983 *Initial Assessment Study (IAS)*, which BACSE did not review. While the solvent burning area was suspected of being a source in the 1990 RI report, in the 1991 Draft Final *Supplemental Remedial Investigation Report*, attention turned to the abandoned leachfield adjacent to Building 201 as a more significant potential source.

It is not clear from the historic data that the solvent burning area was investigated sufficiently to determine if it is or is not (or was or was not) a source of the contaminants detected at Site 9. With base closure now on the horizon, this potential source area should be evaluated more thoroughly in order to have confidence in any future decisions regarding the environmental conditions and risk of Site 9. BACSE understands that this task may be beyond the scope of work covered by this Work Plan, but believes that the uncertainty about the solvent burning area as a potential source must be addressed.

**7. Page 5, Section 3.1.** Are the detection levels for the proposed analyses lower than applicable action levels? In particular, BACSE is concerned with the interpretation of non-detect results. For example, can they can be acceptable as indicating that no further action is needed?

**8. Page 14, Section 6.** The Summary Report should also identify any deviations from the final approved Work Plan. The Summary Report should also include a figure identifying the area or plume of contaminated groundwater at Site 9.

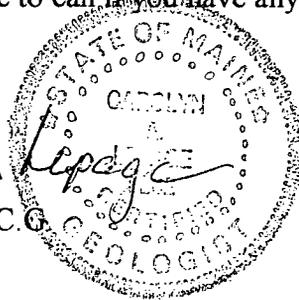
**9. Additional Porewater Sampling.** BACSE believes that the investigations proposed in the Work Plan will move the understanding of, and decision-making for, Site 9 in a positive direction. However, additional porewater sampling along the unnamed stream northeast of Building 201 will likely be needed in the future to better understand and address the distribution and migration of fuel-related and other volatile organic compounds at the site.

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Please do not hesitate to call if you have any questions.

Sincerely,

  
Carolyn A. Lepage, C.G.  
President



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