

July 3, 2007

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

Re: Draft Final Site 9 Ash Land Fill Removal Letter Workplan
Naval Air Station, Brunswick, Maine

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 draft final "Site 9, Ash Land Fill Removal Letter Workplan", dated May 18, 2007, prepared by Oak Group Incorporated. Based on that review MEDEP has the following comments and issues.

1. Existing Hazardous Waste Pile, Page 2, Para 3:

The email summarizing a conference call on April 25, 2007 from you dated April 26, 2007 states:

"Start of Work - The contractor will extend the northern site boundary as needed to provide additional staging area. He will remove the amount of ash material from piles #7 and #8 necessary to isolate the HW pile (based on the calculation, above, and visual inspection). This material will be staged in 500-ton segments and treated as hazardous waste, with all necessary precautions taken (bottom liner, erosion controls, cover, signs, etc). Both Navy and regulatory inspectors will then determine whether the HW pile was kept isolated from the adjacent piles based on the presence/condition of its cover. If they determine it had been, the re-staged material from piles #7 and #8 will be sampled as described in the final LWP and disposed of accordingly. If they determine it had not been, the re-staged segments from piles #7 and #8 will be treated as hazardous waste and disposed of along with the original HW pile (without additional sampling). The remaining ash material of piles #7 and #8 will be restaged into 500-ton piles in the area presently occupied by CDD pile #5, sampled, and disposed of accordingly."

The Navy needs to revise paragraph 2 in the Letter Workplan clearly specifying if any 500 ton segment in whole or in part from Pile 7 and Pile 8 came in contact with or was commingled with the Hazardous Waste pile, that the entire segment(s) will not be sampled and will be disposed of as hazardous waste. Also the Workplan needs to specify that Navy, EPA and MEDEP inspectors will determine the existence and integrity of the poly sheeting.

2. Figure 3: The purpose of this figure is unclear. The northern edge of Pile 8 and the entire eastern edge of Pile 7 should be shown. Please revise. (MEDEP cannot agree with the Proposed Zone of Potential Co-mingling shown on the figure because it is unclear how this was determined.)

Please make these revisions quickly so that the planned schedule for uncovering the Hazardous Waste Pile can be met. Please contact me at (207) 287-7713 or claudia.b.sait@maine.gov, if you have any questions or comments.

Respectfully,

Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

Cf: File
Chris Evans-MEDEP
Dale Mosher-BNAS
Christine Williams-EPA
Carolyn Lepage-Lepage Environmental
Al Easterday-ECC
Ed Benedikt
David Chipman (email only)
Jeff Donovan-ECC (email only)
Carol Warren-(email only)
Catherine Guido-ECC (email only)
Gina Calderone-ECC (email only)
Neal Williams-ECC (email only)
Mary Johanson-ECC (email only)
Joe Gallant-NASB, ROICC (email only)