



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

July 9, 2007

Orlando Monaco
Dept of the Navy, BRAC PMO Northeast
Code 5090 BPOM NE/LM
4911 South Broad St
Philadelphia, PA 19112-1303

Re: Letter Work Plan for the Site 9 Neptune Drive Disposal Site Ash Removal, dated May 18, 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:

GENERAL COMMENTS

1. EPA agrees with the MEDEP comments dated July 2, 2007 and has endeavored not to repeat them.
2. It is not clear how the construction and demolition debris (CDD) is to be sampled using the composite method described. If the CDD is a conglomeration of various materials, all materials should be represented in the samples selected. If that is not clearly described in the previously-approved Work Plan, please augment this revision to clarify how these samples will be collected.
3. Unless comparability studies are performed to confirm the comparability of alternative methods, the Toxic Substances Control Act (TSCA) requires that Method 8082 be used to analyze samples for PCBs and extractions be performed via Methods 3550 or 3540. This should be considered when analyzing PCBs for this project.
4. Page 47 of 53 in ESS Laboratory's Procedure 20-5035 R8 (VOAs by Method 5035) the high level sampling procedure is described. The description suggests that samples be collected with a scoopula; however, EPA recommends that the samples be collected with cut syringe (the same sample protocol/device that is used for the low level sampling procedure) to minimize the loss of volatiles. Please plan to collect the samples with a cut syringe.
5. In response to EPA's e-mail of February 15, 2007, the Navy clarified the standards to be applied to the backfill material. The clarification stated:

A revised Table C-2 is attached and has been revised to include pesticides. For the backfill samples, the hierarchy of standards to be applied shall be as follows: 1. Where an MEDEP

residential standard exists, that value shall be the standard; 2. Lacking an MEDEP residential standard, the EPA PRG residential standard shall be used, where available; or 3. the EPA SSL standard shall be used where neither of the other two standards exist.

However, the version of Table C-2 (revised April 2007) provided in the latest Letter Work Plan has deleted the soil screening level standards and the Navy has inserted a note at the end of Table C-2 stating that site-specific PRGs will be developed during the RI/FS for any contaminant exceeding these standards or for substances for which no standard is available. Please clarify how this table note impacts decisions made relative to the further excavation of soil if confirmation samples are found to exceed these standards. In addition, please note that the development of PRGs is a lengthy process involving specific risk assessment statistical calculations that will require stakeholder agreement.

SPECIFIC COMMENTS ON THE SOP

6. Page 1: In the second paragraph under "Existing Hazardous Waste Pile", the text discusses the potential impacts from asphalt buried in the planned stockpile area for the potentially hazardous material segregated during the uncovering of the hazardous waste pile. To prevent any uncertainty related to cross contamination from the potentially hazardous material, it is recommended that this relocated material be placed on poly sheeting if that is not already included in the work plan protocol.
7. Table 1, p. 4: The LWP sampling plan discussion for CDD states that Pile CDD5 has been sampled and is ready for disposal. Please describe what precautions have been taken to prevent and verify that additional CDD has not been added to Pile CDD5 since it was sampled and analyzed.
8. Table 1, p. 4: It is not clear why a separate set of analytical parameters is provided for the loam and overburden because the backfill analytical parameters are identical to the waste characterization parameters except that PCBs are not also listed for the backfill parameters. It is presumed that a complete single set of analyses will be run, including PCBs, and decisions will be based on the results from that one set of analyses. Please clarify the intent.
9. Page 6: The discussion under "Methodology for Special Waste Disposal/Load Tracking" is not clear. The first sentence suggests that the methodology will be applied to all waste sent off site; however, subsequent discussion refers only to "special waste", which is presumed to mean ash waste. Please clarify if the protocol described in this section will be required for all waste except that hazardous waste will also be managed with the additional protocol in the SOP for hazardous waste management.
10. Figure 3: If the waste removed from the co-mingled zone surrounding the hazardous waste pile is found to be hazardous then the co-mingled zone needs to be expanded to remove additional material from Piles P7 and P8 for segregation and analysis as potential hazardous waste. Please also see the State's comments and provide EPA with the response to the MEDEPs comments.
11. p. 102 of 105: The following description was provided by Navy on page 102 of 105 of the pdf attachment to the revised Letter Work Plan:

Methanol Preservation and Compositing.

ESS provides pre-weighed 40 mil vials with methanol for sample collection. The vials will be post weighted and an average weight will be calculated. A 50 micro liter aliquot will be taken from each vile and composited in a 50 mil volumetric container. A sample will then be drawn for VOC analysis. The % moisture will be determined from the 8oz composite soil sample jar.

This description is obsolete and incorrect and should not be used. Please notify ESS. The correct compositing protocol is provided in the revised Letter Work Plan on page 5.

12. Table C-2: This table includes PQLs based on low level samples via Method 5035; however, the stockpiles will apparently be sampled using the high level sample method (methanol preservation) based on the Letter Work Plan discussion. Is Table C-2 intended to be used only for the confirmation samples? Please clarify the intent.

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

CC:

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