



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

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COMMISSIONER

September 6, 2007

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

Re: Site 9 Letter Workplan (August 2007)
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 "Letter Workplan, Site 9 Removal Action", dated August 22, 2007, prepared by Oak Environmental Consultants, Incorporated. Based on that review MEDEP has the following comments and issues.

1. Section 1.0, Introduction: "OAK will provide at least seven (7) days of advance notification to the Navy with respect to planned sampling (and other) activities ...

This conflicts with bullet 1 on page 2 and with Section 8.0. Please rectify.

2. Bullet 5: The location of the sheeting is up to the Navy and its contractor. Please delete the last sentence.

3. Table 1:

a.) Since there will be two workplans for this project (October 2005 and hopefully September 2007), it needs to be very clear which workplan covers what. Therefore the Navy needs to go through this table and clarify which workplan is being cited. (MEDEP suggest using the date of the workplan and adding a foot note with the full title.)

b.) In the chemical analyses column for ash and for all rows the workplan referenced is 2005, however the PCB analyses has changed from 8081 (2005 Workplan) to 8082 (2007 workplan). This needs to be rectified.

c.) In the LWP Sampling Plan column the workplan referenced in the 2005 except for the CDD row, second line which is the 2007 workplan.

d.) Loam & Overburden Row 6th line. It is unclear which table is meant since they both are relevant but are slightly different. (PCBs and Pesticides analyses have been added.)

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e.) Loam and Overburden, Chemical Analyses: There are two new analyses, Total PCBs using method 8082 and Pesticides using method 8081. This information is not reflected in Table 1 of the 2005 workplan. These two tables must be rectified to include the two new analyses and the new methodology for PCBs so that there is no misunderstanding as to what is to be done.

f.) Loam and Overburden, LWP Sampling Plan, second para, 1st sentence: Add pesticides to this list.

g.) Loam and Overburden and Confirmatory Samples: When comparing soil results, the most stringent criteria of the Maine Remedial Action Guidelines or EPA Region Preliminary Remedial Guidelines must be used. Please revise.

h.) Also when comparing soil sample results to the Maine State Remedial Action Guidelines, if there are multiple carcinogenic contaminants, the Navy and its contractor must use Section IV.C. Please add this to the table 1 in this workplan and Attachment 3, Table C-2. The Navy may want to consider adding this document to the workplan to ensure that the contractor understands that unless there is only one compound detected is the guideline appropriate to use; if there are multiple compounds then someone must determine the appropriate concentration.

i.) Note: "Contaminated ash/soil/HW will be removed to a level that meets ARARs for the site to the extent practicable."

If it becomes necessary for contamination to remain in place the Navy must determine the nature and extent of that contamination, determine if it poses a risk to human health or the environment and establish the necessary institutional controls to prevent exposure.

j.) Note: "Fill material will be screened against the MEDEP residential standard prior to backfilling. Lacking..."

See comment 3.h. above.

4. Section 7, Methodology, Note: "Liquid wastes generated from dewatering operations and decontamination are handled per the Site Workplan and as previously approved."

It is unclear exactly is meant by this sentence because Section 3.0 of the 2007 workplan and a portion of the 2005 cover the handling of liquid wastes. Please rectify.

5. Page 11, Figure 3 and Insert B: "Temporary Sheet-pile locations determined in field with concurrence of on-site regulatory inspectors."

It is unclear what this means. MEDEP has not confirmed that temporary sheeting is in place so does it mean that the existence of temporary sheeting will be determined in the field? If so, please revise. If not, please delete as MEDEP cannot determine where the proposed sheeting should be placed. That is the decision of the Navy or its contractor.

Please contact me at (207) 287-7713 or claudia.b.sait@maine.gov, if you have any questions or comments.

Respectfully,

A handwritten signature in cursive script, appearing to read "Claudia Sait".

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

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