

**RESPONSE TO COMMENTS FROM THE  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
DRAFT LETTER PROPOSAL FOR INSTALLATION OF REPLACEMENT  
MONITORING WELLS - SITE 9  
NAVAL AIR STATION BRUNSWICK, BRUNSWICK, MAINE**

<b>Commenter: Mike Daly, Remedial Project Manager, EPA New England Region 1, Federal Facility Superfund Section</b>	
<b>Comment Issue Date: 20 August 2008 (via email)</b>	<b>Navy Response Date: 05 September 2008</b>

Pursuant to Section VI of the Naval Air Station, Brunswick, Maine Federal Facility Agreement (Oct 1990), as amended, the United States Environmental Protection Agency (USEPA) has reviewed the draft "Letter Proposal for Installation of Replacement Monitoring Wells-Site 9", dated August 8, 2008, prepared by ECC. Based on that review USEPA has the following comments and issues.

**Comments:**

1. I concur with DEP that the two proposed locations along the northern edge of Neptune Drive may be at risk of future abandonment depending on the future extent of ash removal activities to the south of the current removal extent. Confirmation that all removal activities have been completed in the southern portion of Site 9 should be demonstrated before completing these wells.

**Response:** Comment noted.

2. The top of the screen interval for shallow well location MW-09-002 (@10' BGS) should be positioned below the bottom of backfill material used to replace excavated ash & contaminated soil.

**Response:** Agreed. This statement will be stated in the Final Work Plan.

3. An up-gradient well is needed. EPA would recommend a location in the oval-shaped grass island just north of the northwest corner of the June 2008 delineated excavation limit. However, this location may be premature given future planned efforts to characterize soil/ash contamination in this vicinity. If contamination extends in this vicinity, it is probably acceptable to rely on MW-NASB-204 to provide up-gradient ground water quality data for Site 9.

**Response:** Comment noted. The issue of the location of an up-gradient well will be discussed at a future date following the completion of the ash delineation and removal actions.

4. EPA questions the association of detected CVOC contamination in side-gradient wells MW-NASB-227 & MW-09-001 with the Site 9 site conceptual model. EPA believes that low CVOC detections at these side-gradient wells are likely associated with another source of contamination west-northwest of Site 9. While EPA doesn't expect the Navy to evaluate this CVOC ground water contamination as part of this well installation work plan, discussions amongst the Navy/DEP/EPA team will be needed to determine the best path forward in investigating this contamination.

***Response:*** Comment noted and agreed. This issue will be discussed between Navy and project stakeholders at a later date.