



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
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5090
BPMO NE/TB
Ser 08-205
September 9, 2008

Mr. Michael J. Daly
Remedial Project Manager
Federal Facilities Superfund Section
U.S. Environmental Protection Agency (EPA)
1 Congress Street, Suite 1100 (HBT)
Boston, MA 02114-2023

Ms. Claudia Sait
Remedial Project Manager
Maine Department of Environmental Protection (MEDEP)
Bureau of Remediation and Waste Management
17 State House Station
Augusta, ME 04333-0017

Dear Mr. Daly and Ms. Sait:

Enclosed you will find the Navy Responses to Regulator Comments (RTCs) on the Draft Site 9 Monitoring Event 31 Report, September 2007, Naval Air Station (NAS) Brunswick, Maine. These RTCs are provided for your review and concurrence.

If you have any questions or comments, please contact the Navy's Remedial Project Manager, Todd Bober at (215) 897-4911.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul F. Burgio".

Paul F. Burgio
BRAC Environmental Coordinator
By direction of BRAC PMO

Enclosure:

Navy Responses to RTCs on Draft Site 9 Monitoring Event 31 Report, Sep 2007,
NAS Brunswick, Maine

Copy to:

MEDEP (C. Evans)

Gannet-Fleming (D. McTigue)

NASB (L. Joy, M. Fagan)

Lepage Environmental (C. Lepage)

NAVFAC MIDLANT (T. Bober)

NAVFAC ATLANTIC (J. Wright, B. Capito,)

TtNUS (L. Klink, C. Race)

ECC (A. Easterday, G. Calderone, C. Guido, J. Donovan, J. Kiker)

Copy to: (w/o encl)

BRAC PMO NE (P. Burgio)

NAVFAC ATLANTIC (D. Barclift)

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CO NASB (CAPT Fitzgerald)

RAB Brunswick Representative (S. Johnson)

RAB Harpswell Representative (D. Chipman)

MRRA (V. Boundy)

**Responses to Comments Provided by the State of Maine,
Department of Environmental Protection Agency on
Site 9 Monitoring Event 31 (September 2007) Draft Report, February 2008
Naval Air Station, Brunswick, Maine**

Reviewer: Claudia Sait
Date: March 24, 2008
Respondent: ECC
Date: September 11, 2008

Comment #	Location	Comment	Response
1	General	These comments were prepared prior to receipt of a revised EDD for the Fall 2007 data. The highest concentration VOC detected this round was trichlorofluoromethane at MW-NASB-075, and there were no vinyl chloride detections. Diesel Range Organics (DRO) detections persist at the wells near the Galley (MW-NASB-074, MW-NASB-075, and MW-NASB-076); the planned investigation this year should better define the extent of DRO impacted groundwater. (No response required.)	Noted.
2	General	The Fall 2007 round is the first to include the new monitoring well (MW-09-001) located west of the Upper Impoundment Pond. This well and MW-NASB-227 both have detections for TCE and its daughter products, at levels below drinking water criteria. Levels have been fairly consistent over several years, suggesting a minor (but persistent) source is located upgradient. These wells are cross-gradient to the landfill as currently understood, however if the defined ash extent extends further north and west, it may become a reasonable interpreted source for the low VOCs at the western boundary of the site. (No response required.)	Noted.
3	General	Conclusions based on this monitoring event (ME) are limited by the lack of data for wells decommissioned due to the ash landfill excavation, and by data gaps identified in previous ME reports, specifically in the vicinity of MW-NASB-076. Efforts to close this gap are completed or planned for the near future, and the ash landfill removal north of Neptune Drive should be completed in 2008. Pending identification of additional ash on both the north and south of the current excavation which may trigger additional soil removal, MEDEP expects the monitoring network will be re-established as soon as the ash removal and site restoration is complete, hopefully in 2008.	Concur. The Navy anticipates that the monitoring well network will be restored when removal operations and site restoration are completed in 2008.

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4	General	When elevation data are available for MW-09-001 and the staff gauges in the ponds, the groundwater contour maps must be revised for this report to include those elevations.	Concur. To maintain accuracy, all groundwater elevations must be recorded within the same 24-hour period to be included on the same contour map. Since this is not possible for ME31, water level elevations will be recorded for all MWs and staff gauges during ME 32 and included on the ME32 groundwater contour map.
5	General	MW-NASB-070 has been buried or inaccessible for quite some time, when it is uncovered as the soil excavation proceeds, the well must be inspected to see if it has been damaged due to these activities.	Concur. Well MW-NASB-070 will be inspected as soon as it has been uncovered.
6	Table 1-2	MEDEP notes that the Site 9 excavation activities are the likely cause of the historic low water elevation at MW-NASB-081, due to depression of the water table in the excavated area.	Concur.
7	Section 3.1, Bullet 1	The ash landfill removal deserves a mention here, as the limitations of the monitoring network has certainly contributed to the reduction in detected vinyl chloride due to the removal of ash material/debris extending to the former location of MW-NASB-069. Also the reduction in vinyl chloride must not be overstated since the "hottest" well (MW-NASB-069) has been decommissioned for 3 monitoring events. MEDEP suggests the following language: "However MW-NASB-069, the well with the highest historic concentrations of vinyl chloride, has been decommissioned since April 2006 as part of the ash landfill removal."	Concur. The ash landfill removal will be discussed here, and the suggested text will be added.
8	Section 3.1, Bullet 2	Please add a date to indicate when "no significant impacts from the inactive landfill" occurred.	Concur. A date will be added to Bullet 2.
9	Section 3.2, Bullet 2	Please add the following statement to the last sentence. "However MW-NASB-069, the well with the highest historic concentrations of vinyl chloride has been decommissioned since April 2006 as part of the ash landfill removal."	Concur. The suggested statement will be added.

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10	Section 3.2, Bullet 4	<p>“Results from monitoring wells MW-MASB-072, MW-NASB-074, and MW-NASB-075 located down gradient of Site 9 indicate that VOCs including 1,2 DCE and vinyl chloride are not present south of Site 9.”</p> <p>The referenced wells are all within the boundary of Site 9 and the VOCs were not present for this round but were evident in ME-30. Please revise the statement accordingly.</p>	<p>Concur. These three wells are located within the Site 9 boundary. MW-NASB-072 and MW-NASB-075 have not had detections of VOCs since March 2003 and November 1997, respectively. MW-NASB-074 has consistently had VOC detections since the monitoring program began, but did not have detections during ME31. Bullet 4 will be edited to reflect this information.</p>
11	Section 3.3, Bullet 1	<p>The shallow location should not be abandoned when the deep well is installed for two reasons:</p> <ul style="list-style-type: none"> • the screen will have some use as a gauging location to look at vertical gradients, if the new screen is sufficiently offset from the existing well and; • the existing well has had detections for DRO and vinyl chloride and may be needed as a monitoring point. 	<p>Concur. MW-NASB-076 will not be abandoned. It will be used for gauging and may be sampled during future monitoring events as needed. Additionally, a new well with a deeper screen will be added at a location near the S9-B8 soil boring location.</p>
12	Section 3.3, Bullet 2	<p>MEDEP cannot agree at this time that one replacement well will be sufficient to meet the objectives of the Long Term Monitoring Program. It will be necessary to determine whether MW-NASB-070 and MW-NASB-081 will be available after the excavation is completed or if additional wells may be necessary once the full extent of the landfill is known. After the removal action and direct push scheduled for this spring is complete, MEDEP, EPA and the Navy will need to discuss the Long Term Monitoring Program.</p>	<p>Concur. Once the replacement wells are installed at Site 9 in Fall 2008, the Long-Term Monitoring network for the site will be re-evaluated in collaboration with the EPA and MEDEP.</p>
13	Section 3.3, Bullet 3	<p>MEDEP suggest one more round of metals data to assess seasonal variability in the inorganic data. If Navy plans to switch to passive diffusion bags for the VOCs, the first round must assess all three levels in the screen, as has been done in the Eastern Plume.</p>	<p>Concur. An additional groundwater sample will be collected at MW-9-001 and analyzed for metals during the upcoming sampling event.</p>

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14	Section 3.3, Bullet 5	<p>The determination of dropping a well must also include evaluation of the other analytical parameters (such as metals or DRO) if they are being analyzed at that location. As MEDEP has stated elsewhere there must be two rounds with 8260B SIM analysis for vinyl chloride before a location is dropped, to confirm no detects above the MEG.</p> <p>Also, in some cases the purpose of the well(s) is to monitor plume migration (i.e., a sentinel well). MEDEP is willing to reassess the monitoring program but cannot agree to a blanket statement for the elimination of monitoring wells without consideration of their intended purpose. Section 3.4 of the Long Term Monitoring Program establishes the process for program modifications; any reduction to the program must follow that procedure. Please delete or heavily revise the bullet to follow the process in Section 3.4.</p>	Concur. Bullet 5 will be revised as recommended.
15	Appendix D and Table 2-1	Please revise the trend graphs for MW-NASB-227 on pages 59 and 62. The VOC data for Spring and Fall 2007 need to be plotted on the diffusion sample graph rather than the low-flow sample graph.	Concur. The recommended changes will be made to the trend graphs.
16	Appendix A	Many of the field forms for gauging and instrument calibration are for the Old Fuel Farm sampling round. Please omit these pages unless the instruments were used for sampling both sites.	Concur. Calibration forms that do not apply to sampling at Site 9 will be omitted.
END OF COMMENTS			