

**Responses to Comments Provided by the State of Maine
 Environmental Protection Agency on the
 Site 9 Monitoring Event 32 (April 2008) Report, July 2008
 Naval Air Station, Brunswick, Maine**

Reviewer: Ms. Claudia Sait, MEDEP Project Manager
 Date: September 5, 2008
 Respondent: Navy
 Date: October 24, 2008

Comment #	Location	Comment	Response
1	General	The data generally indicate improvement in groundwater quality over recent rounds as the ash landfill removal has progressed. Installation of the new monitoring well locations will improve groundwater assessment with the addition of locations upgradient and downgradient of the former landfill. (No response required.)	Noted.
2	General	For monitoring event (ME) 32, the required analysis for MW-09-01 was reduced without MEDEP concurrence as required by the Long Term Monitoring Plan for Site 9, Section 3.4. In MEDEP comments for ME 31, MEDEP disagreed with recommendation to reduce the analysis to just VOC and suggested one more round of metals data to assess seasonal variability in the inorganic data. Therefore the Navy must add metals analysis for MW-09-01 for at least two more rounds to determine if there is seasonal variability.	<p>Noted. The April 2008 sampling event was performed in full compliance with the Final Site 09 LTMP (EA Oct 2005).</p> <p>The LTMP, per Section 3.4 requirements, can only be modified by the Navy providing written notification to the EPA and MEDEP. The Navy has not provided notification to EPA or MEDEP to adopt MW-09-001 into the Final Long Term Monitoring Plan (EA October 2005), so LTMP Section 3.4 requirements are not applicable for MW-09-001.</p> <p>A full suite characterization (MEDEP DRO, SVOCs, VOCs, VOC/SIM, and metals) was requested by MEDEP and EPA for MW-09-001 during the Fall 2007 sampling round, and the Navy collected and reported these results.</p> <p>In the Navy's ME-31 Response to Comment, which was submitted 11 September 2008, it was stated that metals would be collected in the upcoming round (i.e Fall 2008).</p> <p>The Navy has collected all planned samples, from the Final Letter Work Plan for Site 9 Monitoring Well Installation (ECC 2007) and stakeholder requested samples, from previous responses to comments.</p> <p>Because the MEDEP's March 2008 comment about collecting one additional sample at MW-09-001, was not responded to</p>

Comment #	Location	Comment	Response
			<p>until after the April 2008 (ME-32) sampling event was completed, the Navy response to that comment was to collect one additional sample during the upcoming sampling event (i.e ME-33 Fall 2008). Collection of one additional metals sample in Spring 2008 will result in a data set (i.e Spring and Fall) that addresses seasonal variability. After the Spring 2008 metal results are available, seasonal variability can be assessed, and the Navy will then recommend either metals elimination or metals inclusion into the MW-090-001 sampling suite.</p>
3	General	<p>This report references the "revised version of the LTMP (ECC 2007)". The approved LTMP for Site 9 is dated 2005. However MEDEP has a revision of Table 3-1 (Summary of the Long Term Monitoring Program at Site 9) sent via email on March 29, 2007 from Al Easterday of ECC, which was approved by MEDEP. The table summarized the existing well network due to the decommissioning of some of the monitoring wells due to the removal of the ash landfill. MEDEP could find no record of this revision being added to the LTMP. If this is the referenced version then it must be codified by incorporating it into the approved LTMP <u>immediately</u> with the appropriate list of revision page etc and text changes. To avoid another situation which resulted in stipulated penalties being assessed the Navy must ensure that a clear record of all revisions to the monitoring program be incorporated into the approved LTMP.</p>	<p>Noted. As stated in Section 1.0, the ME-32 sampling event was in accordance with the Final Site 09 LTMP (EA 2005), and several non-LTMP stakeholder requests for additional MEDEP DRO sampling occurred at MW-NASB-074, MW-NASB-075, and MW-NASB-076, and the Navy also sampled MW-09-001 for VOCs and DRO.</p> <p>The Summary of the Long Term Monitoring Program at Site 9 sent by ECC via email on March 29, 2007 to stakeholders was not the Final LTMP (EA 2005) revision nor the draft Final LTMP (ECC 2007) or the revised version of the LTMP (ECC 2007). The emailed table was simply a list of the monitoring locations proposed to be sampled, along with the analyses, in Spring 2007. Due to the past confusion between the LTMPs and the Optimization Plan (EA 2004), which lead to stipulated penalties, ECC thought it was prudent to provide sampling and analysis tables to stakeholders. In this way communication between all parties, before the sampling started, would lead to consensus and confidence in the monitoring event sampling to achieve the LTMP goals.</p> <p>All references to the draft Final LTMP (ECC 2007) or revised version of the LTMP (EDC 2007) shall be removed from this monitoring event report.</p> <p>The Navy does agree that any LTMP modifications must be codified, in accordance to Section 3.4 of the Final Site 09 LTMP (EA 2005), by presenting them in writing as modifications to the Final LTMP. Such modifications will be identified by a Navy cover letter, list of revisions page, and the revised tables. Any stakeholder request for sampling, performed by the Navy, which has not been codified in the</p>

Comment #	Location	Comment	Response
			LTMP, is not part of the officially part of the LTMP, but may be reported in the monitoring event reports.
4	Table 1-1	Please check and revise the table to reflect the sampling activities this round; MEDEP noted the VOC analyses were not checked for MW-NASB-074, 075, 076, and MW-09-001.	Concur. Table 1-1 will be revised to reflect the sampling activities for ME32.
5	Tables 1-4 and Table 1-1	Please add MW-NASB-077 to the gauging and field parameters portions of the Table 1-1 Sampling Summary to match the data in the field parameters tables.	Concur. MW-NASB-077 will be added to Table 1-1.
6	Table 2-1	Please continue to report the data for trichlorofluoromethane for wells sampled for VOCs, it has been frequently detected over the history of the site and increased significantly at MW-NASB-072 and MW-NASB-075 in 2007, but was not reported this round. If the data are available from the lab please include it in the table	Noted. Laboratory reported trichlorofluoromethane results will be provided in Table 2-1, and trichlorofluoromethane results will also be added to the MEDEP EDD provided in the Final Report.
7	Section 2.3.2, Surface Water Sample Location SW-0101	Please remove either 1,2-dichloroethene or cis-1,2-dichloroethene from the first sentence since it is the same compound.	Concur. cis-1,2-Dichloroethene will be removed from the first sentence, and replaced by, "1,2-dichloroethene (total)", as that is the basis of the surface water standard.
8	Section 3.1 Bullet 1	Please add a reference to the soil removal and decommissioning of the landfill wells such as MW-NASB-069 as noted in Bullet #2, they have been critical to reductions in VOCs and the reduced monitoring network may not provide an accurate representation of the groundwater conditions.	Concur. A reference to the soil removal and decommissioning of the landfill wells will be noted. Please note that the overall total concentration of VOCs from all wells sampled has decreased with the decommissioning of MW-NASB-069, because the removal action, resulted in less VOC data being collected. However, the removal action has also eliminated a potential source, so it is anticipated that removal action will lessen considerably the VOCs and metals levels at Site 09.
9	Section 3.1 Bullet 2	Reading this bullet would lead one to believe these wells were sampled as part of ME 32, which they were not, therefore the claim of "no significant impacts" cannot be made. Please delete the first two sentences unless there are other wells that can be used to support these statements. A statement must be made to the effect that until these wells are replaced this goal cannot be assessed.	Noted. A timeframe reference will be added to the statement, "...no significant impacts, since April 2001 (MW-NASB-069) and April 1995 (MW-NASB-079 and MW-NASB-080) to their decommissioning, from the inactive landfill"
10	Section 3.2 Bullet 4 Page 3-3	Trichloroethylene and 1,2 dichloroethylene were detected in MW-NASB-074 this round, please revise the bullet.	Concur. The bullet will be revised to include trichloroethylene and 1,2 dichloroethylene detections.

Comment #	Location	Comment	Response
11	Section 3.3 Recommendation Bullet 1	<p>a.) MEDEP does not concur with the recommendation as written. Please revise the reference for the LTMP to "ECC 2005" with a specific reference to the revised Table 3-1 (ECC 2007) if appropriate. (Also see general comment 3 above.)</p> <p>b.) Monitoring Well MW-NASB-076 must not be abandoned when the deep well is installed for two reasons: the first is the shallow screen will have some use as a gauging location to look at vertical gradients, if the new well screen is sufficiently offset from the existing well; the second is the existing well has had detections for DRO and vinyl chloride and is still needed as a monitoring point. Please revise this recommendation.</p>	<p>a) Concur. The "revised version of the LTMP (ECC 2007)" will be deleted, and replaced with "Final Site 09 LTMP (EA 2005) as augmented with stakeholder requested MEDEP DRO analysis at select monitoring wells and sampling MW-09-001 for VOC, MEDEP DRO, and for metals in Fall 2008".</p> <p>b) Concur. MW-NASB-076 will not be abandoned. The last sentence will be re-phrased to show abandonment of MW-NASB-076 is not the intent of this recommendation. In the Final Proposal for Installation of Replacement Monitoring Wells, Site 9 (ECC 2008), the details of the monitoring well locations and screen intervals are provided.</p>
12	Section 3.3 Recommendations Bullet 2	<p>MEDEP does not concur with this statement as written. The Navy has submitted and MEDEP has provided comments on a well reinstatement workplan to replace the monitoring wells decommissioned during the ash landfill removal. To clarify that more than one well is proposed for the decommissioned wells MEDEP suggests the following language: <i>"Recommend installation of monitoring wells to replace those decommissioned. One monitoring well should be placed within the soil removal area, once the soil removal action is complete."</i></p>	<p>Noted. The statement will be rewritten to clarify that more than one well is proposed for the decommissioned wells.</p>
13	Section 3.3 Recommendations Bullet 3	<p>MEDEP does not concur with this recommendation. (See general comment 2.) MW-009-01 must continue to be monitored for metals. Please delete this recommendation.</p>	<p>Concur. MW-09-01 recommendation changed to sample in Fall 2008 and evaluate metals results.</p>
14	Section 3.3 Recommendation Bullet 4	<p>While the monitoring will assess the effect of the ash landfill removal it is unclear if it is the Navy's intent is to change the LTMP objective for monitoring the sediment, surface water, and leachate. Currently the objective for sampling this media is to assess for the effectiveness of the selected remedy (natural attenuation with monitoring), therefore MEDEP cannot concur with the recommendation at this time although the stakeholders may want to discuss if the LTMP goals should be expanded. Please revise.</p>	<p>Noted. The selected remedy (monitored natural attenuation with monitoring) is anticipated to be enhanced by the removal of ash as a potential source of metals and VOCs. The Navy does not propose at this time to change the LTMP. This recommendation merely states that the Navy will continue to adhere to the LTMP, but expects site improvements due to the removal action.</p>
15	Section 3.3 Recommendation Bullet 5	<p>MEDEP does not concur with the recommendation. The LTMP (2005) Section 3.4, Program Modifications outlines how the program will be modified and it does not state "shall be eliminated" but that it <u>may occur</u> based on among other things, data trends. If a well or monitoring point was dropped simply because it had four rounds of VOC non detections then all the sentinel wells would be eliminated and the goals of the LTMP would not be achieved.</p> <p>Also as stated in the LTMP (2005) Section 3.3, "Modifications to the monitoring network included in the LTMP may be appropriate if a trend of contaminant concentrations change significantly (e.g., four monitoring rounds). If a monitoring well is being considered for</p>	<p>Noted. As stated in the Final LTMP (EA 2005), written notification will be provided for any modification of the LTMP. This recommendation will be removed.</p>

Comment #	Location	Comment	Response
		<p>deletion from the sampling program for VOCs, groundwater samples from that well will be analyzed using EPA Method 8260B Modified for Selected Ion Mass for a minimum of four consecutive sampling rounds, in order to achieve the detection limit of 0.15 µg/L (State MEG for vinyl chloride.”</p> <p>If the Navy wants to pursue this recommendation, MEDEP suggests that the Navy include this as a topic for an upcoming Technical Meeting.</p>	
END OF COMMENTS			