

**RESPONSE TO COMMENTS FROM THE  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NEW ENGLAND – REGION 1  
ON THE DRAFT SUMMARY REPORT - SITE 9 ASH DELINEATION AND  
INVESTIGATIONS AT BUILDING 201 AOC & IRRIGATED PLAYING FIELD  
NAVAL AIR STATION BRUNSWICK, MAINE**

<b>Commentor: Michael Daly, EPA - Remedial Project Manager Federal Facilities Superfund Section</b>	
<b>Comment Issue Date: 3 November 2008</b>	<b>Navy Response Date: 11 February 2009</b>

The U.S. Environmental Protection Agency has reviewed the subject document and comments are below:

#### **GENERAL COMMENTS:**

##### **Site 9 Ash Delineation**

1. The results from DP-6 that were used to create vertical cross-section B-B' failed to delineate the western limit of ash. EPA recommends that as part of the planned Site 9-North ash delineation effort, direct push boring(s) be added west of DP-6 to delineate the extent of ash material and refine the volume of ash material remaining in this portion of the site.

*Response: Agreed.* During the recent (December 2008) Area North of Site 9 direct-push investigation, an additional boring (DP-21) was advanced approximately 50 ft west of DP-6. The boring was advanced to 12 ft bgs, no ash was observed in any interval. The results of this boring, plus results from two additional borings requested by the MEDEP which were also advanced during the December investigation, will be included in this report. Therefore, the extent of ash has been delineated to the west.

2. EPA believes it's premature and not appropriate at this time to recommend any remedial decisions for these ash materials and contaminated soils. The Navy still plans to delineate the north-western extent of ash/contaminated soil and the results from both of these efforts will need to be considered and evaluated to determine if these ash materials/soils present current and/or future risks to human health and the environment. Given that the conceptual Site 9 model has significantly changed with the implementation of the removal action and that the full extent of ash and contaminated soils has yet to be delineated, an administrative change to the Site 9 remedy will ultimately be needed for the site. The Navy and regulators will need to discuss how this administrative change to the Site 9 remedy can be most effectively and efficiently completed.

*Response: Agreed.* In response to this comment, and the MEDEP's corresponding Comment No. 13 on this draft summary report, bulleted recommendations, as presented in Section 4.2.1 –

Site 9 Ash Delineations in the draft summary report, will be deleted and the following text will be inserted; *“With concurrence from the MEDEP and EPA, recommendations for further actions at Site 9 will be addressed following the completion of the investigation in the area north of Site 9 (conducted in December 2008). These recommendations will be presented in the Summary Report for the Area North of Site 9”.*

### **Pore Water Sampling Results**

3. EPA noted that chlorinated solvents, including PCE, TCE, 1,2-DCE, as well as petroleum hydrocarbons, were detected in the pore water samples. PW-8 exceeded the MCL/MEG with a reported TCE concentration of 172 ug/l. While EPA is not completely sure of this fact, it appears that this TCE hit represents the highest level of VOCs ever detected in the Site 9 vicinity. Assuming these samples were collected correctly and are representative of shallow ground water quality discharging to the upper impoundment pond, EPA is further convinced that another source(s) of ground water contamination likely exists somewhere north-northwest of Site 9 based on interpreted ground water flow direction. EPA previously commented, as part of our review of the Site 9 Replacement Monitoring Well Work Plan, that VOC contamination detected in monitoring wells side-gradient to the interpreted ground water flow direction at Site 9 supports a hypothesis that an up-gradient source of ground water contamination, other than Site 9, may be present. The Navy and regulators will need to discuss and develop a strategy to understand the nature and extent of any source(s) that could be attributed to this detected ground water contamination.

*Response:* This was a typographical error. Upon review of the validated analytical data, it was found that TCE was not detected above the method reporting limit (1 ug/L for TCE) in sample PW-8. Trichlorofluoromethane was detected in sample PW-8 at a concentration of 172 ug/L, which is below the MEG of 2,100 ug/L. The value of 172 ug/L was inadvertently placed in the TCE result location. The second paragraph under Section 3.2.1.4 will be deleted. The beginning of the third paragraph will be revised to read; ~~The remaining 11 pore water samples had several VOCs were detected at concentrations below regulatory standards.~~ *“Of the 13 pore water samples collected, several contained VOCs; however, samples results were at concentrations below state and federal regulatory standards. All concentrations were qualified as estimated (J) with the exception of TCE detected in PW1 at a concentration of 1.2 ug/L. TCE was also detected in 3 other samples at concentrations below regulatory standards. TCE concentrations ranged from 0.38 (PW2), to 1.2 ug/L in PW1, below the respective MEDEP MEG (7 ug/L) and EPA MCL (5 ug/L). 1,2-Dichloroethene (total) was detected in 6 of the...”*

PW-8 sample results from the laboratory data package will be attached to these RTCs. Table 3 will also be revised to reflect this correction.

### **Irrigated Playing Field**

4. EPA concurs with the Navy’s interpretation of ground water sampling results that Eastern Plume treatment plant effluent temporarily used to irrigate the nearby recreational playing field has not negatively impacted ground water conditions underlying the field.

***Response: Comment noted.***