

Harding Lawson Associates



September 1, 1998

Mr. Emil Klawitter
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Town of Lester, PA 19113-2090

**Subject: Response to Comments on "Summary Report on Sampling and Analysis of Soil and Groundwater at Building 95 and Groundwater at Site 11"
NAS Brunswick, Maine**

Dear Emil:

This letter is intended to provide responses to the limited number of comments that were received on the subject report. The report, dated June 12, 1998, summarizes the results of soil and groundwater sampling conducted by Harding Lawson Associates (HLA) at Site 11 and the Building 95 site. Comment letters were received from the Maine Department of Environmental Protection (MEDEP), the U.S. Environmental Protection Agency (USEPA), and Lepage Environmental Services, Inc. Responses are provided below.

MEDEP comment letter, dated July 28, 1998: MEDEP commented that the analytical detection limit reported for toxaphene in the groundwater samples from the Building 95 site was 5.2 micrograms per liter (ug/l), which exceeds both the federal Maximum Contaminant Level of 5.0 ug/l and the Maine Maximum Exposure Guideline of 0.3 ug/l. In response, I did a quick check of previous analytical results from the site, including samples that were collected directly from the source area during the initial site investigation. I did not find any detections of toxaphene in any of the samples. Toxaphene was also not identified as a pesticide used historically at the base during the records search. Therefore, toxaphene is not a contaminant of concern for the Building 95 site, and the elevated detection limit for this compound is not significant.

USEPA comment letter, dated August 31, 1998: USEPA's letter contained no specific comments on the summary report.

Lepage Environmental Services comment letter, dated July 31, 1998: Carolyn Lepage commented that the geotextile fabric that was reportedly placed at the bottom of the excavation at Building 95 during the removal action was not observed during the direct-push soil sampling conducted by HLA. The removal action contractor was required by the specifications to install the geotextile fabric as a marker to delineate the bottom of the excavation. HLA (at the time, ABB Environmental Services) was not at the site on the day that the contractor backfilled the excavation, and we cannot document for certain that the fabric was placed. It is possible that the fabric is, in fact, in place at the bottom of the excavation, and that the sampling probe merely punctured

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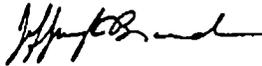
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through the fabric instead of cleanly cutting a piece of the material. In any event, the transition from fill to native soil was abrupt and visually-distinctive, both in color and texture, so there is little doubt that the sample was collected from the intended interval.

Because of the minor nature of the comments discussed above, I do not see the need for revising and re-issuing the previous report. I will, however, make sure the comment letters and this response letter are placed into the information repositories along with the summary report.

Sincerely,

HARDING LAWSON ASSOCIATES



Jeffrey E. Brandow, P.E.
Program Manager

cc: G. Apraham, NASB
M. Barry, EPA Region I
C. Lepage, Lepage Environmental Services
C. Sait, MEDEP