



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

December 12, 2006

Orlando Monaco
Dept of the Navy, BRAC PMO Northeast
Code 5090 BPMO NE/LM
4911 South Broad St
Philadelphia, PA 19112-1303

Re: Letter dated December 1, 2006, received December 12, 2006, Subject: Remedial Investigation/Feasibility Study (RI/FS) Schedule for sites 12 & 17 and the Military Munitions Response Program (MMRP) and Quarry areas of concern (AOC) at the Naval Air Station Brunswick/Topsham, Maine

Dear Mr. Monaco:

The Environmental Protection Agency (EPA) is in receipt of the letter referenced above which provided schedules for documents under the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA). The schedules extended the document due dates to support the RI/FS at both the sites 12 & 17 an additional nine months. However, no good cause for an extension was included even though several documents are overdue and the last remedy in place (LRIP) date will now also have to be extended at this BRAC V Site.

The Navy attended a technical meeting in Portland with EPA and the Maine Department of Environmental Protection last week. Navy noted on the last day of the meeting that a letter had been sent with new schedules, but did not provide a rationale for missing document due dates or for changing the schedule. EPA explained to the Navy that they had to have a good cause for schedule extensions under the FFA; however, no changes were made to the referenced letter. Therefore, pursuant to ' 16 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the EPA denies the extension request for the subject schedules and finds the Navy in non-compliance with the FFA.

Provide a new schedule extension request in accordance with the FFA and provide an explanation for missing the due dates for the PA at site 12, the RI work plan at site 17, and the SI work plan for the MMRP AOCs within 7 days of receipt of this letter.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc. David Peterson/EPA (peterson.david@epa.gov)
Bryan Olson/EPA (olson.bryan@epa.gov)
Claudia Sait/Maine DEP (claudia.b.sait@maine.gov)
Lisa Joy/NASB (lisa.joy@navy.mil)