



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
NEW ENGLAND - REGION I  
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BOSTON, MASSACHUSETTS 02114-2023

November 12, 2002

Lonnie Monaco (monacolj@efane.navy.mil)  
Engineering Field Activity Northeast, Naval Facilities Engineering Command  
Code 1821/LM  
10 Industrial Highway, Mailstop 82  
Lester, PA 19113-2090

**Re: Draft 2001 Annual and Monitoring Event 15 Reports for Building 95, Naval Air Station Brunswick, Maine**

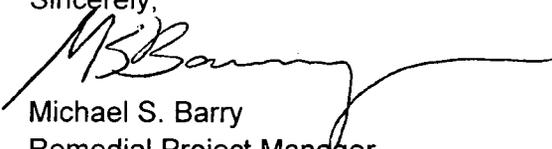
Dear Mr. Monaco:

Thank you for the opportunity to review the above reports which were submitted by EA Engineering, Science and Technology on behalf of the Navy on 16 August and 17 October 2002 respectively. In general the EPA concurs with the draft reports summaries, conclusions and findings; our specific comments and/or any issues are attached.

We highly recommend that a Consensus Statement be developed for Building 95. Due to it's mixed RCRA and CERCLA status and long history, a large amount of resources relative to the site risks have been expended to arrive at the present point of understanding site's status by project team members. A consensus statement would document for the record decisions made to date with their rationale and chart the course ahead to great benefit of project team successors and hopefully the most efficient means to site closeout..

For any questions, please contact me at 617.918.1344 or [barry.michael@epa.gov](mailto:barry.michael@epa.gov).

Sincerely,

  
Michael S. Barry  
Remedial Project Manager  
Federal Facilities Superfund Section

Attachment 1: Specific Comments to 2001 Draft Annual Report  
Attachment 2: Specific Comments to Monitoring Event 15 (April 2002)

cc. Ed Benedikt/Brunswick Conservation Commission ([rbenedik@gwi.net](mailto:rbenedik@gwi.net))  
Tom Fusco/BACSE ([tfusco@clinic.net](mailto:tfusco@clinic.net))  
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Tony Williams/NASB ([WilliamsA@nasb.navy.mil](mailto:WilliamsA@nasb.navy.mil))

**Attachment 1**  
**US EPA New England Comments to Draft 2001 Annual Monitoring Report,**  
**Building 95, Naval Air Station Brunswick, Maine**

Comment codes:      NR      No specific response required, comment for record or observation  
                         ED      Editorial comment  
                         RR      Response requested  
                         MTG      Recommend comment be discussed at meeting prior to formal response

1.      (NR) EPA has no formal comments to this report at this time. We note that the recommendations regarding eliminating VOCs, SVOCs, TAL metals and rotenone commencing in the April 2002 event were concurred upon by EPA and MEDEP by prior correspondence.
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**Attachment 2**  
**US EPA New England Comments to**  
**Draft Monitoring Event 15 Report (April 2002), Building 95**  
**Naval Air Station Brunswick, Maine**

Comment codes:      NR      No specific response required, comment for record or observation  
                         ED      Editorial comment  
                         RR      Response requested  
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1.      (NR/MTG) Section 3 Recommendations Bullet 1. EPA will look forward to evaluating any draft proposal to alter the LTMP the Navy may develop after a review of the 2002 data. We recommend that this matter would be best discussed at a technical meeting prior to the Navy submitting a draft revision to the LTMP in order to meet all concerns with a minimum of administrative burden.
2.      (NR) Section 3 Recommendations Bullet 2. Concur; note that EPA concurred to the removal of maleic hydrazide from the LTMP by letter dated 13 September 2002. Note that MEDEP did not concur since the April 2002 Event Report had not been received at that time.
3.      (RR/MTG) Section 1.4, Page 4. Though not required by a decision document, this would be an appropriate place to document that the soil and groundwater IC's (per NASBINST 5090.1B) have not been violated.
4.      (RR/MTG) Section 1.6, Page 4 regarding low surrogate recoveries. Recommend including a quantitative assessment to accompany the "bias low" yet also definitively state that recoveries are in the acceptable range. Per Appendix C, section C.4.1 the low recoveries were in the 43-67% range, and >40% is acceptable per appendix C.1.
5.      (NR/MTG) General. Recommend a consensus statement be developed, see cover letter.