

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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January 26, 2005

Mr. Orlando Monaco
Department of Navy
Engineering Field Activity-Northeast
Code 1823/OM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Building 95, Monitoring Event 20
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

Thank you for the responses to the Maine Department of Environmental Protection's comments on the Draft Final Monitoring Event 20 Report, Building 95 (September 2004). MEDEP has reviewed the response to comments (RTC) and has the outstanding comments, which follow the original number system.

3. Section 1.6, page 1-4:

MEDEP Original Comment: It appears from references within this document that it was done in accordance with the November 2004 LTMP. If that is the case then the visual inspection section must include an inspection of the area for soil disturbance, new structures, or the removal and use of groundwater to ensure compliance with the institutional controls for this site (LTMP Section 3.1.5). Since there is a new kennel adjacent to the Building 95 site this should be noted in the document and possibly photographed for future reference. If ECC has not revised their field inspection forms to ensure compliance with institutional controls, it is recommended that they do so.

Navy's Response: Concur. Even though the May 2000 Final LTMP does not list for documentation compliance with land use requirements, ECC did inspect the Bldg 95 site for any land use violations, as part of the site inspection.

Please note that the Final LTMP (Nov 2004) post dates the ME-20 (Sept 2004), and it could not be used for the ME-20 sampling nor cited in the Bldg 95 ME-20 Report. Also please note that the Draft Final January 2004 LTMP had the Site Inspection Form from the May 2004 Final LTMP, which did not require documentation of land use control.

Future ME's and Site Inspections will be based upon the Final LTMP (Nov 2004), and ECC will use the updated Site Inspection Form to document compliance with land use controls.

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MEDEP Follow Up Comment: Section 1.6, Visual Inspection section states: Site inspection activities were completed in accordance with the Final LTMP (EA 2004a) ..." MEDEP confusion is that it is unaware of any Final LTMP for Building 95 dated May 2004; if the November 2004 LTMP was not used, then LTMP in effect as of the September monitoring event was May 2000 (with revisions). Please recheck your source.

MEDEP has received a number of response to comments (RTC) and draft follow up response to comments for various sites from ECC. MEDEP has noted that ECC has in response to follow up comments has changed its original response without noting the follow up comment. The comments and response to comments are all part of the administrative record, therefore both the original comment and its response and the subsequent comment and response must be included so that the continuity of the RTC process can be followed.

If you have any questions or comments please call me at (207) 287-7713 or email me at claudia.b.sait@maine.gov.

Respectfully,



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