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

December 14, 2006

Orlando Monaco (orlando.monaco@navy.mil)
Dept of the Navy, BRAC PMO Northeast
Code 5090 BPMO NE/LM
4911 South Broad St
Philadelphia, PA 19112-1303

Re: Building 95, Draft Letter Work Plan to Confirm Post-Excavation Soil Sampling Results, dated 06 November 2006, Naval Air Station Brunswick, Maine

Dear Mr. Monaco:

Pursuant to § 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and comments are below:

General Comments

1. Navy should also take some samples of the material used for backfill after the previous removal, unless the Navy has certification that the backfill was "clean". If the Navy does have the analytical results, please provide.

2. The Base-Wide QAPP includes sampling for groundwater, sediment, surface water, and leachate. It does not include sampling and analysis for soils. This work plan must either include a QAPP for soils or the base-wide QAPP should be amended to include soils.

3. EPA believes it is highly irregular that the confirmation sampling results cannot be verified through the Navy's contracting closeout repots. Please detail and put in place controls in the cleanup program to ensure valid data is included in the administrative record for this BRAC V NPL Site.

Specific Comments

4. **pp. 2 & 6:** The text notes (p. 2) that geotextile fabric was placed over the relocated soil placed south of Avenue B. It is later stated (p. 6) that the entire program of sampling assumes a geotextile marker is present throughout the site as an indicator of the 1994 excavation depth. If the geotextile is not found, how will the original excavation depths be verified? This is important with respect to the contingency analyses, because it is essential that the first sample interval be below the 1994 backfill, or it will not serve as a confirmation that the removal was complete. If the geotextile marker is not found, or if some other unequivocal indicator of the 1994 excavation

depth cannot be found, the deeper ("contingency") samples should be analyzed. Please clarify.

5. **p. 5, bulleted summary:** The summary of sample numbers provided in the bulleted list appears to be inconsistent with Table 1. In particular, the text shows 17 samples to be collected at locations 1-17, while the table shows an additional 17 at contingency depth #1 and 7 at contingency depth #2, for a total of 41 samples. The text shows 24 samples to be collected at locations 35-40, while the table shows 6 samples at each of three depths at these locations, for a total of 18 samples. Please check for consistency.

6. **Page 5 Direct-Push Soil Sampling Investigation:** The Section discusses collecting soil samples from below the excavated area. However, there is no discussion on testing the clean soil that was placed in the excavated areas. Was this soil tested before it was placed in the excavated area to determine if it was free of contaminants? Again Navy contracting submittals should be available to verify this aspect of the previous removal action.

7. **Page 5 Direct-Push Soil Sampling Investigation:** The Section indicates that the soil samples will be collected using the Direct-Push sampling procedure and the samples will be analyzed using Method 8081. However, the Work Plan does not include the soil sampling procedure, the laboratory's analytical standard operating procedures, quality control information (field and lab), and data review nor does the Work Plan reference the Quality Assurance Project Plan for the Site. Note the Base-Wide Quality Assurance Project Plan for the Long-Term Monitoring Program (January 2006) Section 7.2.5 Site 17 – Building 95 does not discuss collecting soil samples. Therefore, this information needs to be added to the quality assurance project plan as an addendum.

8. **p. 6, last bullet:** The text indicates that samples from the area between the northern limit of the 1994 excavation and the kennel fence (locations 46-50), which apparently has not been sampled previously, will be analyzed initially only for the first target interval (0-2 ft). Is it known that this area has not been disturbed (e.g., by site grading following construction)? If not, failure to detect pesticides in the 0-2 ft interval does not provide assurance that there is no contamination in deeper soil. The "contingency" samples proposed from the 2-4 ft interval should be analyzed.

9. **p. 6, last paragraph, Direct-Push Soil Sampling Investigation:** The first paragraph states "all samples will be analyzed for pyrethrins and pesticides by EPA Method 8081". Method 8081 does not include pyrethrins in its analyte list. Explain how the pyrethrins will be analyzed. If Method 8081 is to be modified for the pyrethrins analysis then the laboratory's modified Method 8081 standard operating procedure needs to be added to the quality assurance project plan as an addendum.

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. Claudia Sait/ME DEP (claudia.b.sait@maine.gov)
Ed Benedikt/BASCE e-mail only(rbenedik@gwi.net)
Tom Fusco/BACSE e-mail only (tfusco@gwi.net)
Carolyn LePage/LePage Environmental (calepage@adelphia.net)
Peter Golonka/Gannet-Fleming e-mail only (pgolonka@gfnet.com)
Lisa Joy/NASB (lisa.joy@navy.mil)
Al Easterday/ECC e-mail only (aeasterday@ecc.net)