

# Lepage Environmental Services, Inc.

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April 10, 2007

Mr. Orlando Monaco  
Department of Navy  
Base Realignment and Closure PMO-Northeast  
4911 South Broad Street  
Philadelphia, PA 19112-1303

Subject: February 2007 Draft *Remedial Investigation Scoping Plan for Site 17, Building 95*

Dear Mr. Monaco:

The following comments regarding the February 2007 Draft *Remedial Investigation Scoping Plan for Site 17, Building 95* (prepared by ECC) are submitted on behalf of the Brunswick Area Citizens for a Safe Environment (BACSE).

- 1. General Comment.** BACSE concurs with comments submitted by the Maine Department of Environmental Protection (MEDEP) and U.S. Environmental Protection Agency (EPA) regarding the Draft Scoping Plan. The agencies' comment letters are dated March 28, 2007, and March 26, 2007, respectively.
- 2. Beginning Date for Site Operations.** Throughout the Scoping Plan, pesticide operations at Building 95 are described as beginning in 1955. However, the November 1992 *Environmental Evaluation/Cost Analysis (EE/CA)* (see page ES-1, for example) states that use of Building 95 for pesticide operations began in the 1940s. Please verify the correct date, and make any necessary corrections to the Scoping Plan.
- 3. Page 1, Section 1.** Please provide the reference for the MEDEP guidance mentioned in the first paragraph, along with the reference for the Building 95 long-term monitoring plan.

Please provide a figure with the outline or extent of the site clearly shown.

Figure 2 shows both a Storage Building and a Shed, but not a former "Storage Shed" that is mentioned in the second paragraph. Please either add the former Storage Shed to Figure 2 or correct the text in the second paragraph.

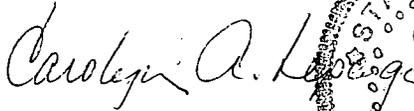
- 4. Page 2, Section 1.1.** The first item listed as a purpose of the RI is to evaluate the nature and extent of remaining pesticide contamination in the soil and groundwater beneath the site. How and when will the potential for off-site migration of contaminants be evaluated?
- 5. Page 3, Section 2.1.** Figure 3 is referenced in the first paragraph with regard to site features. However, the Figure 3 that was provided to reviewers by email on March 23<sup>rd</sup> is the Conceptual Site Model/Potential Exposure Pathways. Please correct the figure citation in the text.
- 6. Page 10, Section 2.3.3.** The second paragraph states that soil samples were collected by direct-push methods in 1992. However, page 1-25 of the 1992 EE/CA states that surface soils (0-0.5' bgs) were collected with a bucket auger or a stainless steel spoon, and shallow subsurface soil from 1.5-2.0' or 3-3.5' bgs was collected with a bucket auger or TerraProbe. Please correct as necessary.
- 7. Page 12, Section 2.4.** Following the additional excavation of the site in October 1994, was there supposed to be a geotextile layer, intended as a marker horizon, laid on top of the contaminated soil backfill south of Avenue B, before the area was covered with clean fill?
- 8. Page 13, Section 3.1.** BACSE suggests the August 1998 *Results of Bimonthly Monitoring Well Gaging Program Conducted at Building 95, Old Navy Fuel Farm, and Site 7*, prepared by EA Engineering, Science and Technology, be added to the list of documents to be reviewed, as it should provide information on groundwater characteristics for the area, not just Site 17.
- 9. Page 15, Sections 3.2.1.1 and 3.2.1.2.** Should the last sentence in the first paragraph in Section 3.2.1.1 and the last sentence in Section 3.2.1.2 refer to Section 3.1, not Section 3.3?
- 10. Page 17, Section 3.5.1.** Three potential primary sources are listed in Section 3.5.1. MEDEP comment number 10, dated March 28, 2007, requests adding another three potential sources. According to the November 1992 EE/CA, and as noted on page 10 of the Scoping Plan, prior to 1976, any material left over from pesticide/herbicide operations was dumped on site. BACSE doesn't recall that a precise location for this dumping was ever identified and investigated. Is there historic information that would help pin down the location(s) for on-site dumping? If not, how will the RI address this potential source/sources?
- 11. Page 18, Section 3.6.** Is there MEDEP (or other State of Maine) guidance for risk assessment? If so, the appropriate document should be referenced and used.

**12. Page 20, Section 3.7.2.** COCs are mentioned in this section. There were numerous chemicals reported to have been stored, handled, and disposed at Site 17. How and when will the Contaminants of Concern for Site 17 be determined?

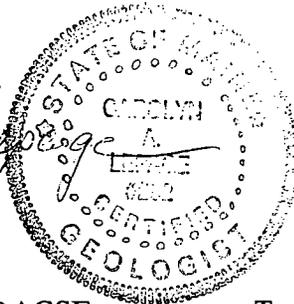
**13. General Comment.** BACSE suggests that a reference list for acronyms be added to the Scoping Plan and all subsequent RI/FS related documents.

Please do not hesitate to call if you have any questions.

Sincerely,



Carolyn A. Lepage, C.G.  
President



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