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U S NAVY RESPONSES TO MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON SITE 17 MONITORING EVENT 25 APRIL 2007 DRAFT REPORT NAS
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**Responses to Comments Provided by the State of Maine,
Department of Environmental Protection on the
Site 17 Monitoring Event 25 (April 2007) Draft Report, July 2007
Naval Air Station, Brunswick, Maine**

Reviewer: Ms. Claudia Sait, MEDEP Project Manager
Date: August 27, 2007
Respondent: Navy
Date: September 7, 2007

Comment #	Location	Comment	Response
1	General	The data overall are consistent with the past few years of monitoring, with low 4,4'-DDD and 4,4'-DDT detected at MW-NASB-67 in Monitoring Event (ME) 24 and with low 4,4'-DDD detected in MW-NASB-067 and low 4,4'-DDT detections in MW-NASB-097 reported in ME 25. None of these detections exceeded 0.1 ug/L. There are no indications of sampling or analytical issues that compromised the data. A summary of the site history through 2003 is included as an appendix, and is a useful addition. Improvements from past ME reports have been continued in the latest submittals.	Noted.
2	General	The appendices for ME 25 do not indicate the subject of the file. Please revise the CD appendices so that they have titles in addition to "Appendix X".	Concur. The CD will be updated in the Final version to include the appropriate titles.
6	Section 1.3 and Table 3-1	MEDEP notes that toxaphene, although not a site contaminant of concern, appears to have been eliminated from analyte list. Please provide the rationale for eliminating this analyte in the report or provide the data.	Noted. As provided for in the accepted Monitoring Event 22 response to Comment #2 (" <i>...Toxaphene will be removed from the laboratory reporting list, as it is not a historical LTMP COC</i> ") the Navy removed toxaphene from the analyte list. Toxaphene is not required in the Basewide QAPP (ECC/EA 2006) nor was it required in any of the past Site 17 LTMP analyte lists.
7	Section 3.2	MEDEP cannot agree to entirely discontinuing the monitoring of groundwater at the site as long as buried waste remains at the site. However, MEDEP is open to discussing a reduction in monitoring, perhaps to sampling every other year. When the Remedial Investigation is completed then the required groundwater monitoring will be revisited, and further revisions to the LTMP are likely.	Noted. The future of Site 17 monitoring could be discussed during the September 2007 technical meeting.

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8	Figures 1-2 and 1-3 and Table 1-1 and Table 1-2	Table 1-1 indicates that MW-NASB-209R and MW-NASB-210 are part of the long term monitoring as gauging locations, however they were not gauged in either ME 24 or ME 25 or the data was not included in the reports. Figure 1-2 must be expanded to show the wells in both reports and future rounds must include the gauging of these wells. That data must be then be included in the appropriate tables and shown on Figure 1-2 and Figure 1-3 or their equivalent.	Noted. These wells were not gauged. As per the November 2004 LTMP for Site 17, MW-NASB-209R and MW-NASB-210 are not part of the Long-Term Monitoring Program. To reflect this, they will be removed from Table 1-1. However, historically these wells were gauged to provide additional data on local groundwater flow patterns. They will be gauged during the Fall 2007 sampling event. Their locations and data will be represented and reported in the Fall 2007 monitoring event report with the following footnote: "These wells are not part of the Site 17 Long-Term Monitoring Program but are gauged to provide additional data on local groundwater flow patterns."

END OF COMMENTS

**Responses to Comments Provided by the United States Environmental Protection Agency
New England – Region 1 on the
Sites 1&3 Eastern Plume Monitoring Event 25 (April 2007) Draft Report, July 2007
Naval Air Station, Brunswick, Maine**

Reviewer: Ms. Christine Williams, EPA Project Manager
Date: August 16, 2007
Respondent: Navy
Date: September 7, 2007

Comment #	Location	Comment	Response
1	General	Water-level gauging was conducted at six wells, as per the monitoring plan. The inferred equipotential surface (Fig. 1-3) indicates flow generally from NW to SE. Results are consistent with previous characterization. Groundwater sampling was carried out at three wells, as per the plan. Most pesticides were non-detect (ND). 4,4'-DDD (0.039J ppb) was detected at MW-NASB-067, and 4,4'-DDT (0.023J ppb) was detected at MW-NASB-097, both at low concentrations. (For comparison, the Maine MEG for 4,4'-DDT is 1 ppb.) Historical detections were found principally at MW-NASB-097; heptachlor epoxide and alpha chlordane were previously above their respective Maine MEGs.	Noted.
2	General	It is agreed that the LTMP should be reviewed following planned additional characterization and soil removal (e.g., p. 3-2, sec. 3.2). However, monitoring coverage and frequency should not be reduced until any soil removal is completed, and several rounds under the current plan are completed, in order to verify that the removal has not (at least temporarily) mobilized groundwater contamination due to disturbed ground, open excavations, etc.	Noted. The future monitoring could be discussed at the next technical meeting.
3	Page 1-2, Section 1.3	It is noted that the ME24 report stated that MW-NASB-097 and -098 did not have dedicated pumps, while this report (ME25) states that all three wells have dedicated pumps. If new pumps were installed in -097 and -098 between ME24 and ME25, this should be noted here for the record.	Dedicated pumps were installed for Monitoring Event 23 (June 2006).
4	Page 2-1, Section 2.2	The text notes (correctly) that the ORP recorded at MW-NASB-067 was below average. It might be noted, too, that the recorded value of -1 mV represents a very large change from the value of +335 mV recorded in ME24. It appears that the ME24 result may have been the anomaly.	Noted. The ORP data will be provided graphically so that comparisons can be made.

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5	Page 3-2, Section 3.2	Please see General Comment regarding discontinuation of groundwater monitoring for the Site.	Noted.
END OF COMMENTS			