

MEMORANDUM

TO: Meghan Cruise, EPA Site Manager

FROM: Jack Hoar, CDM Site Manager

PROJECT: Brunswick Naval Air Station (BNAS)

SUBJECT: Meeting Minutes from BNAS Technical Review committee (TRC)
June 20, 1989

DATE: June 27, 1989 (Revised July 11, 1989)

Representatives from the Brunswick Naval Air Station (BNAS), Northern Division Naval Facilities (NORDIVNAVFAC), E.C. Jordan, Maine Department of Environmental Protection (DEP), Environmental Protection Agency (EPA), Brunswick-Topsham Water District, Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Fish and Wildlife Service (USFWS), Brunswick Community and Camp Dresser & McKee Inc. (CDM) met at the BNAS on Tuesday, June 20, 1989 at 9:00 AM. A complete list of participants is attached.

The agenda for the day included a visit to sites 7,8, and 9 by representatives of NORDIVNAVFAC, EPA, ATSDR, USFWS AND CDM, followed by a meeting of all TRC participants to discuss the project status and comments on the Draft Additional Sampling Plan dated April 1988 [sic] and submitted by E.C. Jordan. Following the discussion and resolution of the comments on the sampling plan, the remaining sites (1,2,3,4,5,6,10,11,12 and 13) were visited. The comment review discussion was presented by Mel Dickenson of E.C. Jordan. It was noted that Mel will now assume project management responsibilities for BNAS RI/FS project for E.C. Jordan, replacing David Gulick. It was also noted that Meghan Cruise would be replacing Charlotte Head as EPA Site Manager at BNAS.

The first item presented involved the current scheduled submittal date for the Remedial Investigation (RI) report. The current schedule specifies January 29, 1989 as the submittal date. Ron Springfield of NORDIVNAVFAC proposed that this submittal date be changed to April 2, 1989. The reasons given for the scheduled extension included, additional review time, the addition of several new sites and additional laboratory analytical time requirements. This request for schedule extension was acceptable to the community representative if it meant an improved product. EPA requested that they receive written documentation for the schedule extension including justification for it.

Rick Beringer of NAVFACENCOM next spoke of the Navy's intent to prioritize the sites at the BNAS in order to address sites with the most pressing environmental problems first and possibly delay remedial work on sites deemed less significant until a later date. Charlotte Head (EPA) responded that she was not authorized to agree to such a proposal which

might differ from the normal RI/FS process of site investigation and remediation. More specific information on this proposal should be submitted in written form to EPA to allow for their review and decision on this matter.

The meeting continued with Mel Dickenson's review of EPA's submitted comments on the Additional Sampling Plan. E.C. Jordan's response to each individual comment was presented and the resolution to each comment will be included in the final submittal of the Additional Sampling Plan document. The comments are attached for reference and this memorandum will note the resolution of each comment by referencing the page number in the same format as the comments:

Attachment I

- o Pg. 3-4 - E.C. Jordan will identify and clarify the 90 day holding time at the DRMO facility for contaminated materials.
- o Pg. 4-5 - Accepted, will revise.
- o Pg. 4-13 - Bentonite seals will be consistently specified as 3 ft. in depth. A complete description of monitoring well grouting and backfilling procedures and well screen depth information will be provided.
- o Pg. 4-12 - The required depth of the protective steel casing was decided as 4 ft.
- o Pg. 4-13 - E.C. Jordan believes that dedication of bailers and hoses is unnecessary and their sampling procedures are adequate to prevent cross contamination.
- o Pg. 4-13 - E.C. Jordan will add sampling plan discussion to indicate a concern for the issue of cross contamination.
- o Pg. 4-14 - Accepted, this is the current practice and will be indicated as so in the sampling plan.
- o Pg. 4-14 - Considering the short time frame in which water level measurements are measured at specific sites, it was decided that barometric pressure changes should not be a significant concern.
- o Pg. 4-16 - E.C. Jordan's opinion is that the source at site 2 has been characterized as well as can be justified on a cost/benefit ratio. They think the source of the mercury in the leachate is probably widespread throughout the site 2 landfill area and further investigation will not locate a specific isolated source. They will so state their conclusions in their formal response to comments.
- o Tables 4-4 to 4-8 - Comment accepted, proposed revisions will be made.
- o Pg. 4-21 - E.C. Jordan's opinion is that the current specified

level of analysis is justified based on existing information.

- o Pg. 4-28 - More information on the Forster MK-26 device will be provided.
- o Pg. 4-31 - Comment accepted, will revise.
- o Pg. 4-38 - E.C. Jordan's opinion is that the current level of information is adequate and that no additional investigation beyond that currently specified is required.
- o Pg. 4-38 - Comment accepted. Chloride and sulfate analyses will be added.
- o Pg. 4-39 - Comment accepted. The location of the golf course water supply wells will be shown.

Section 4.4.17 - The old well/spring will be tested and the results will determine the recommendation for further action.

- o Pg. 4-48 - Comment accepted. The requested analytical method information will be provided.
- o Pg. 4-50 - Further test pitting is proposed in this area.
- o Pg. 4-57 - E.C. Jordan contends that these wells are not fully screened in the glaciomarine clay layer and thus do not represent the permeability of that layer which is specified as 10^{-8} cm/sec.
- o Pg. 4-68 - More information will be added to justify the proposed scope of sampling and analysis in the current sampling plan.
- o Section 5-1 - Comment accepted. The requested information will be provided in the sampling text.

Ken Finklestein's Letter

- o After discussion of the requested scope of sampling and analysis in Ken Finklestein's letter it was decided to sample at locations 302 and 201 rather than the requested 4 sampling locations. E.C. Jordan will provide the rationale for their decision in the revised sampling plan.

Attachment II

- o All these minor comments were accepted and revisions will be made accordingly.

Comments provided by the Maine Dept. of Environmental Protection

- o Section 3.3 - The two comments on this section were accepted and the requested clarifications will be provided.

- o Section 4.3 - Comments 1,2,4,5, and 6 were accepted and the appropriate revisions will be made to the final Sampling Plan. Comment No. 3 will be implemented only in specific areas. It is E.C. Jordan's opinion that it is not required in all locations.
- o Section 4.4 - Comment No. 1 will be acted on later after more information is obtained. Comment No. 2 was accepted. In response to comment No. 3, discrete samples will be specified. Comment No. 4 was accepted. The clarification requested in comment No. 5 will be provided. Comments 6 and 7 were accepted. In response to comment No. 8, PCB and pesticide analysis will be added. The clarifications requested in comments 9 and 10 will be provided in the final Sampling Plan. In response to comment 11, discrete samples will be specified. No penetration of the clay layer will be clarified in response to comment 12. The damaged well at site 8 will be repaired. In response to comment 13, the current understanding of groundwater flow in that area is the basis for sampling decisions, E.C. Jordan will provide this rationale in the final sampling plan submittal. E.C. Jordan's response to comment 14 was that if current sampling analysis results indicate a problem at the source, the sampling area will be expanded. The rationale for this decision will be provided in the sampling plan. Comment 15 was answered with the explanation that the 6 ft. depth of sampling is the depth limit of a hand auger. Three borings are specified in this area to sample at greater depths. Comments 16 and 17 were accepted and the requested clarifications will be provided.

After breaking for lunch, the meeting resumed with a discussion of comments provided by the Navy.

- o The first comment made by Rick Beringer was the proposal to delete the proposed soil gas survey investigation in the area west of site 1, as shown in Figure 4.2. The basis for this recommendation was the contention that there existed no evidence to indicate that this was an area of potential contamination.
- o The second comment was a proposal to delete the installation of proposed MW-221 which the Navy felt was unnecessary.
- o The Navy proposed the phasing of monitoring well installations shown in Fig. 4.4 on page 4-26. Postponement of the installation of monitoring well couplets 226', MW-227 and MW-228 was proposed until data is available to justify their installation.
- o On pg. 4-42 at site 11, the Navy proposed the reduction of the number of hand auger borings from 10 to 5.
- o The Navy proposed to split off a portion of what now is considered site 4 into a new site to be known as site 13. This area would now be considered in the initial or "site assessment" phase. The Navy proposed to thus postpone the installation of monitoring wells 412, 413 and 414 until the initial investigation is complete.

- o On pg. 4-55, the Navy proposes only water level measurements for MW's 812, 813 and 814.
- o The Navy proposes to include a description of these proposed changes to the Additional Sampling Plan in a cover letter attached to the final submittal. EPA requested that the rationale behind these proposed revisions be included.
- o EPA noted its disapproval of the Navy proposing revisions to the Sampling Plan in this manner without allowing time for EPA review of such revisions.

E.C. Jordan indicated that delivery of the revised Additional Sampling Plan with the cover letter explaining Navy proposed revisions could be expected in early July 1989. It was agreed that the target date for the next TRC meeting to review the Round 3 data package would be the first week of August. The meeting ended and was followed by a tour of the remaining sites by representatives of NORDIVNAVFAC, EPA, ATSDR, USFWS, and CDM.

JH/sb

TRC MEETING
NAS BRUNSWICK

20 JUNE 1989

NAME	ORGANIZATION	TELEPHONE
Cdr. G.D. Cullison	PWO NAS Brunswick	
Capt. E.B. Darsey	C.O. NAS Brunswick	
Susan Weddle	Community Member	
Carolyn Lepage	Maine DEP	
Denise L. Messier	Maine DEP	
Richard Willey	EPA, Hydrologist	
Charlotte Head	EPA	
Louise House	ATSDR	
Meghan Cruise	EPA, Remedial Project Mgr.	
Jack Hoar	CDM	
Jim Mikolaities	USFWS	
Mel Dickenson	E.C. Jordan, Project Mgr.	
David Gulick	E.C. Jordan	
Tom Longley	E.C. Jordan	
Bill McLoughlin	Navy Public Affairs	
Patricia L. Ferrebee	Northern Division, Phila.	
Norman J. Cyr	Brunswick-Topsham	
Rick Roecker	SJA NAS Brunswick	
Greg Apraham	NAS Brunswick	
Rick Beringer	Northern Div., NAVFACENGCOM	
Ron Springfield	Northern Div.	