

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

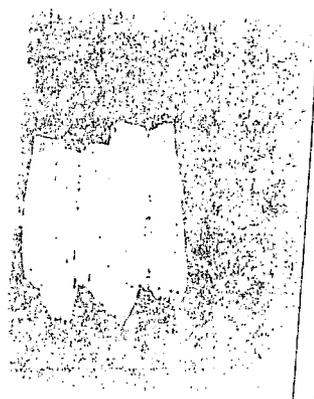


ANGUS S. KING, JR.  
GOVERNOR

MARTHA KIRKPATRICK  
COMMISSIONER

January 5, 2001

Mr. Orlando J. Monaco  
Code 1821 LM  
Department of the Navy, Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mail Stop 82  
Lester, PA 19113-2090



Re: Aqueous Diffusion Sampling Pilot Study-Eastern Plume  
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the report entitled Summary of the September 2000 Aqueous Diffusion Sampling Pilot Study, Eastern Plume, dated 30 November 2000, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

**General Comments:**

1. The recommendation to use aqueous diffusion samplers for remaining wells in the Eastern Plume, and to include Site 9, is not acceptable with the DEP without first (1) conducting a 3-interval pilot monitoring for three consecutive monitoring events to characterize chemical stratification that may be present and to select the most appropriate depth interval in each well, and (2) including provisions to collect selected field parameters at those wells that the EPA and DEP consider critical for MNA analysis. We concur that low-flow sampling should be part of the pilot study. The recommendation would be more appropriate if it only stated the desire to expand the pilot study of the remaining wells.
2. Concerning the recommendations of future monitoring depths within each of the 10 well screens (Table 1), the Department readily agrees with the recommended interval for 7 wells, but asks the Navy to reconsider their proposed intervals for 3 wells. Our choices for the questioned wells are:

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688  
RAY BLDG., HOSPITAL ST.

BANGOR  
106 HOGAN ROAD  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769-2094  
(207) 764-0477 FAX: (207) 764-1507

MW-105A	Deep Interval	Well/screen depth likely at top of plume; deep interval recorded the only detection of TCE
MW-311	Mid/Deep Combination	A compromise setting between middle and deep is most attractive (say 5.5 to 7.5-foot interval)
MW-319	Middle	Deep only appears better because a mid-sample was not analyzed for ME-17; shallow interval is too erratic, also concentrations <u>decreased</u> with depth for ME-16.

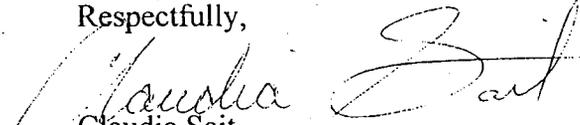
3. The Department finds the format of Attachment C to be interesting but difficult to visually use. We suggest that two standard X-Y graphs be tried for each well – one that includes the major contaminant compounds (COCs), and the second to show all other compounds that have hits.
4. In our January 03, 2001, conference call it was agreed to discuss aqueous diffusion sampling in more detail in our March Technical Meeting. The Department looks forward to this discussion.
5. While the Department is not opposed to switching to limited aqueous diffusion sampling it must be done cautiously using the best scientific methods to ensure that the goals of the long term monitoring plans are met. One of the goals of any long term monitoring is to ensure that the remedy is effective therefore it may be necessary to discuss the appropriateness of diffusion sampling for these sites independently.

The natural attenuation with monitoring remedy approved at Site 9 requires that certain field parameters be taken at the time of the sampling event to indicate whether or not attenuation is occurring. While the remedy in place for Sites 1, 3 and the Eastern Plume may not require field parameters be taken, if in the future the Navy want to move to monitored natural attenuation it will be necessary to compile some of this information in order to prove that conditions conducive to NA exist.

6. Another limitation is that the change in sampling methods will, at least temporarily, complicate or even eliminate the existing trend analyses, the latter requiring that trend analyses have new starting dates.

Thank you for the opportunity to review this report. If you have any questions or comments please call me at (207) 287-7713.

Respectfully,



Claudia Sait  
Project Manager-Federal Facilities  
Bureau of Remediation & Waste Management

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