



28 September, 2001

Mr. Lonnie Monaco
Remedial Project Manager
Engineering Field Activity - Northeast
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

RE: Review of Maine Department of Environmental Protection Draft Investigation of Overburden Geology to Assess Groundwater Migration Across the Southwestern Boundary, October 23 – 27, 2000, Dated September 11, 2001.
Naval Air Station, Brunswick, Maine
Contract D62472-92-D-1296, Contract Task Order No. 0047
EA Project No. 29600.47

Dear Mr. Monaco:

EA Engineering, Science, and Technology is pleased to provide review comments of the Maine Department of Environmental Protection (MEDEP) draft report entitled "Investigation of Overburden Geology to Assess Groundwater Migration Across the Southwestern Boundary, October 23 – 27, 2000" dated 11 September 2001. EA has reviewed the document and our comments are provided below for your inclusion within the Navy's comment letter to the MEDEP.

General Comments

The Navy appreciates the significant efforts put forth by the MEDEP as part of this investigation. The report provides a thorough documentation of the field efforts completed during the MEDEP's overburden investigation. We recognize the effort required to generate the cross-sections provided in the document, and we believe these cross-sections represent a significant advance in the understanding of the geology and hydrogeology along the southern boundary of NAS Brunswick.

We believe the findings of this report will have a significant effect on the understanding on the *downgradient behavior of the Eastern Plume*. In particular, the finding that the overburden in the downgradient area of the Eastern Plume is comprised of geologic material, which does not transmit significant ground water, indicates that the Eastern Plume cannot migrate off-site through the soil overburden. The need for the existing pump and treat system should be re-evaluated in light of the finding that a permeable pathway leading off-base does not exist in the overburden in the downgradient area of the Eastern Plume. One primary goal of the pump and treat system is to achieve hydraulic containment of the Eastern Plume within the overburden.

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This goal appears to have been achieved by natural conditions based on the findings presented in this report. We recommend that this topic be discussed during an upcoming technical meeting.

The data presented in this report in the cross-sections and text of this report include references to the locations of clay linear features. These clay linear features have been hypothesized by the US EPA's consultant, although no conclusive data has been provided to the Navy to document or support their existence and their implication on the conceptual model for the Eastern Plume. Inclusion of discussion of these features in an MEDEP document may appear to the public to be an endorsement of this hypothesis. The Navy feels it is important in any public document to clearly distinguish hypothesized features, such as the clay linear features, from those, which have been documented with physical evidence and have been provided for peer review. Therefore, due to the unproven nature of these clay linear features and their unsubstantiated nature, the Navy recommends that the final version of this report remove discussion of the clay-linear features.

It has been our pleasure providing Engineering Field Activity – Northeast these comments on MEDEP's draft investigation report. If there are any questions, please do not hesitate to call me at 781-275-8846, ext 209.

Sincerely yours,



Alexander C. Easterday, P.G.
Project Manager

AE/caw
Attachments

cc: M. Fohner (EFA-NE)
K. Kilmer (EA)
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G. Calderone (EA)