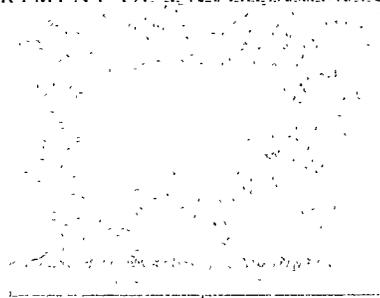




ANGUS S KING, JR.  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MARTHA KIRKPATRICK  
COMMISSIONER

July 18, 2002

Mr. Anthony Williams  
Public Works-Environmental  
Naval Air Station  
437 Huey Drive  
Brunswick, ME 04011

Re: Topsham Annex  
Phase II Environmental Site Assessment-Parcel 2

Dear Mr. Williams:

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the draft responses to MEDEP comments for the Phase II Environmental Site Assessment, Topsham Annex Parcel 2, dated February 2002, prepared by Summit Environmental Consultants, Inc.. As you are aware MEDEP has ongoing concerns regarding both petroleum sheens and VOC at parcel 2 as outlined in our letter to you, dated July 12, 2002. Therefore the merits of Summit Environmental's interpretation of low risk, minor source and no further action are unacceptable and MEDEP cannot concur with their conclusions at this time.

The area of the former power plant and potential area of solvent disposal generally has not been explored. Therefore, the report's limited view misses the mark because nearly all the borings are clustered in the northwestern segment of the former power plant area where the buried fuel tanks once existed. The sampled monitoring wells northeast of the tennis courts are located across a drainageway that likely would have prevented migration from the power plant, and besides, a local source of petroleum was found and addressed there. MEDEP's interpretation remains that the groundwater solvent source appears to be outside the area covered by the borings (farther east).

MEDEP does not agree that the data indicates the TCE and VC contamination originates west/northwest of former Building 369. The pattern and range in concentrations suggest a plume is present that either has its source at the former western cooling tower, or underneath the building foundation, which is an additional 1 acre in size. Because solvent levels in groundwater exceed MCLs and MEGs, we do not agree with the responses "Speculation of potential alternate sources is not warranted..." and "Additional investigations or remediations are not warranted at this Site".

However, rather than continue rounds of comments and responses to comments MEDEP recommends finalizing the document with the draft responses by Summit dated June 12, 2002, even though MEDEP stands by its original comments. Be sure to include MEDEP's comment letters in the final report. MEDEP anticipates working with the Navy to further investigate this site and determine if remediation is necessary.

MEDEP has GPSed parcel 2 in order to accurately locate the seeps and drainage ways. A figure is being developed that will incorporate all the information acquired to date. This should aid in our discussions and knowledge of the site.

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Page 2 of 2

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

Respectfully,

A handwritten signature in cursive script, appearing to read "Claudia Sait". The signature is written in black ink and is positioned over the typed name and title.

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

Cf: File  
Larry Dearborn-MEDEP