



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

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COMMISSIONER

September 17, 2004

Mr. Orlando Monaco
Department of Navy
Engineering Field Activity-Northeast
Code 1823/OM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Building 95, Monitoring Event 17 Report Response to Comments-Follow Up
Naval Air Station, Brunswick

Dear Mr. Monaco:

MEDEP has reviewed the Navy's response to comments for Building 95, Monitoring Event 17 Report-April/May 2003, dated July 13, 2004. In general the responses are acceptable except for those outlined below.

ME-17, General Comment 3:

"The Navy would be interested in discussing the MTBE issue to develop a reasonable sampling approach to identify the source of this contaminant."

Follow up comment. MEDEP looks forward to discussing this topic with the Navy at the next technical meeting. As part of this discussion it will be necessary to discuss the significance of the MTBE trend and its likely source.

ME-17, Specific Comment 5:

The Navy responded "...To more accurately reflect groundwater flow at the Building 95 site, only those wells in the immediate vicinity are included on the contour map."

Follow up comment. MEDEP continues to believe that water-table elevations recorded for Event 17 for the 1-acre Building 95 site has not been correctly contoured. Straight-line contours have been drawn for most past monitoring events without any obvious data conflicts using only data points in the "immediate vicinity". However, it is unusual to show a radical bow in one contour (71.00 feet) and no curvature in the next downgradient contour (70.50 feet), as shown on Figure 3. Nevertheless, over the period of monitoring, groundwater has been shown to flow generally southeastward, with flow direction apparently varying approximately 30 degrees. This degree of variance may be natural, or may be a result of inaccurate contouring. Only one of three downgradient wells in Figure 3 has shown pesticide contamination (at very low levels), presumably because it is the closest to the source area and is appropriately located with respect to groundwater flow direction. In order to resolve this on-going disagreement on water table contours, 2-3 piezometer should be installed to get an accurate understanding of the groundwater flow at this site. Please add this item to the agenda for the next regularly scheduled conference call.

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Page 2 of 2

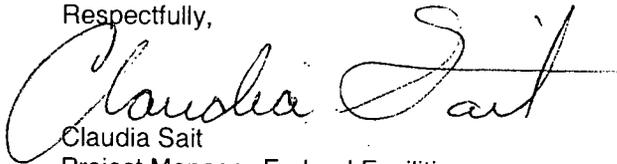
ME-17, Specific Comment 13:

"We believe the wells used in development of the site groundwater contour map are sufficient, and the map is accurate as drawn."

MEDEP stands by its original comment. Please see the follow up response to Specific Comment 5 above.

If you have any questions or comments please call me at (207) 287-7713 or email me at claudia.b.sait@maine.gov.

Respectfully,

A handwritten signature in cursive script that reads "Claudia Sait". The signature is written in black ink and is positioned above the typed name and title.

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

Cf: File
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