



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NAS BRUNSWICK  
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May 31, 2005

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

Re: Eastern Plume-Relocation of EP-LOG-04  
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP) has reviewed the email letter request to relocate the soil boring EP-LOG-04, dated May 19, 2005, prepared by Environmental Chemical Corporation (ECC) and has concluded that it cannot agree with moving the EP-LOG-04 location approximately 300 feet southwest of the approved Work Plan location. Our reasons for this position are as follow.

1. Foremost, the original location is near the center of an interpreted deep depression in the clay surface, where the regulators have the expressed concern that high concentrations of chlorinated hydrocarbons may exist and escape removal by the current remedial extraction well system. The Navy's proposed relocation is on the edge of this depression in a convex part of the contours where movement of contaminated groundwater along the top of clay into contaminant "hot-spots" appears unlikely. The proposed relocation is within an area downgradient of the targeted deep depression, where existing monitoring well data appear to define past and current groundwater contamination. It is improbable that the proposed relocation will provide pertinent information to better understand past and present contaminant movement to the EW-05/P-105 locality, whereas the original location of EP-LOG-04 should be considerably better.
2. The arguments given by the Navy to justify the relocation appear flawed. Concerning the Navy's first item, EP-LOG-01 is not closer to the former FTA source than the original 2004 Work Plan location of EP-LOG-04. Although EP-LOG-02 is slightly closer, it is too far south and west to address the concerns for the EW-05/P-105 and Picnic Pond area. Under the proposed plan, the northern part of the Eastern Plume will still not be adequately characterized in regards to the possible need for installing an extraction well in this area.

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3. The basis for the second argument (top of page 2) is the detection of "residual traces ... of VOCs indicating the potential for DNAPL migration from an upgradient source area". Residual traces that will likely be found should not be equated with the migration of a DNAPL this far from the source without support from other types of field evidence. MEDEP is concerned about the possible presence of any solvent concentration found that is greater than 0.5 to 1 mg/L, and does not expect that DNAPL will be found or implicated by this work. The goal is to learn what concentrations now exist in the clay depressions, not upgradient or downgradient of the depressions.

Therefore, to meet the objectives of the workplan the Navy must commit to building a short access roadway to the center of the targeted depression. Such roads have been constructed at other military cleanup sites in Maine and elsewhere in the nation to properly locate groundwater monitoring wells. MEDEP expects the most appropriate data to be collected at the original location of EP-LOG-04, even though extra effort and funds may be required.

Thank you for the opportunity to review this request. If you have any questions or comments please call me at (207) 287-7713 or email me at [claudia.b.sait@maine.gov](mailto:claudia.b.sait@maine.gov).

Respectfully,



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