



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NAS BRUNSWICK  
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COMMISSIONER

February 18, 1998

Mr. Emil Klawitter  
Code 1823 EK  
Department of the Navy, Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mail Stop 82  
Lester, PA 19112-2090

Re: Final Report, Monitoring Event 9-July 1997, Site 9,  
Neptune Drive Disposal Site, Naval Air Station, Brunswick

Dear Emil;

The Department of Environmental Protection (DEP or Department) has received and reviewed the report entitled "Final Report, Monitoring Event 9-July 1997, Site 9: Neptune Drive Disposal Site, Naval Air Station Brunswick (November 1997)" prepared by EA Engineering, Science, and Technology. Based on that review the Department has the following comments and issues.

**General Comments:**

1. It is unclear from Department records whether the DEP ever reviewed the locations of the background well in the long term monitoring program. If not, it may be necessary for the Department to review the selected background wells locations and what is upgradient to determine if they represent true background levels.
2. The Navy needs to remove samples results collected from MW-211B and MW-801 from the list of background concentrations. It is clear that the inorganic results have been impacted by the sampling procedures which resulted in elevated turbidity levels in the samples. The text states that both of the wells in question were purged dry before they reach equilibrium. This is likely the cause of the high turbidity values.

**Specific Comments:**

3. Water Quality Indicator Parameters, Section 2.2, Page 5,

"Two wells (MW-NASB-078 and MW-NASB-079) were sampled after being purged dry, and reported turbidity of greater than 10 NTU at the of sampling."

Purging wells dry must be avoided by the samplers. The sampling plan needs to be modified to account for wells where level equilibrium can not be established. There are many modifications that can be made to account for slowly recharging wells. Pumping a well dry will effect water chemistry results for VOC, SVOC, and inorganic parameters. However, the effects can not be characterized

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other than by stating that the results are suspect. Therefore, it is imperative that wells not be purged dry (to the top of the pump). Additionally, purging the pumps dry will result in shorter pump life and will increase costs for the Navy.

Please feel free to call me at (207) 287-7713 if you have any questions or comments regarding this matter.

Respectfully,

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

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

cf: File  
Richard Heath -DEP  
Mike Barry-EPA  
Jim Caruthers-NASB  
Peter Nimmer-EA  
Susan Weddle-BACSE  
Jeff Brandow-ABB-ES  
Jeff Dale-USN  
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