



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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COMMISSIONER

April 5, 1999

Mr. Emil Klawitter  
Code 1823 EK  
Department of the Navy, Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mail Stop 82  
Lester, PA 19113-2090

Re: Summary Letter, Long Term Monitoring Program  
Sites 1,3, Eastern Plume, Site 9, and Building 95  
Brunswick Naval Air Station

Dear Mr. Klawitter:

The Department of Environmental Protection (DEP or Department) has reviewed the summary letter outlining the Long Term Monitoring Program, dated March 16, 1999, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

Comments

The Department has reviewed this summary in preparation for the April monitoring event and this cursory review should be viewed as an interim measure and should not be misconstrued as approval of a final Long Term Monitoring Plan for any of these sites. Additional discussion with the Navy in regards to additional monitoring well(s) for building 95 and surface water and sediment sampling at site 9 is still needed.

1. MW-230B needs be added as a gauging location only. DEP has previously stated at technical meetings that this well will be critical to monitoring changes in the vertical gradient component approximately 400 feet south of Extraction Well No.1. This well is located where EPA has recently expressed interest in a possible fault-type feature in bedrock (an extension of the upper Mere Brook valley). The Navy has included in the LTMP gauging network many wells that are less important due to high well location density. MW-222 or MW-220 could be dropped to pick up MW-230B.
2. Table 6 needs to be revised to indicate that MW-NASB-077 and MW-NASB-078 will be sampled for VOCs and gauged. DEP is willing to discuss a time limit on sampling these wells for VOCs.

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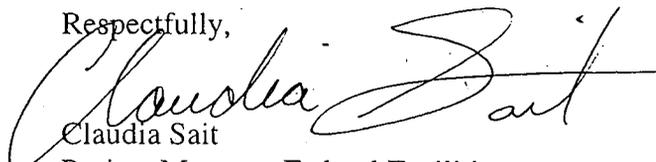
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3. Based on our earlier comments on the monitoring network for Building 95, the Department does not agree with the proposed 4-well monitoring plan for Building 95, as presented in Table 7. At least one more down gradient monitoring well is needed.
4. The attached map for Site 9 shows nine monitoring wells associated with the NEX Service Station that are not listed in Table 6. Most, if not all, of these wells are being monitored under the NEX program. These locations are potentially valuable to evaluate Site 9 groundwater flow pathways and the Department endorses their inclusion on this figure. However, these wells should be assigned a different well symbol than the Site 9 wells, and a note added explaining monitoring/gauging of these wells.
5. Sediment sampling should be performed at LT-901 and SW-010 for VOCs and TAL. Surface water should also be taken bi-annually at SW-12.
6. Sediment sampling should be performed on a limited basis at SW-12 for VOCs and TAL.
7. In lieu of sediment sampling at the historic sampling locations (SW-11, SW-12, SW-915, SW-916, SW-919, SW-922) the Department would like to discuss the installation of shallow ground water wells at the edge of the pond. The wells would be sampled for VOC's and TAL.

The Department agrees with the summary Long Term Monitoring Program as an interim measure only for the next monitoring event, so that a better understanding of the goals of the long term monitoring can be achieved for site 9 and building 95.

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

Respectfully,

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

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