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STATE OF MAINE
 DEPARTMENT OF ENVIRONMENTAL PROTECTION

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June 8, 2004

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EA ENGINEERING,
 SCIENCE & TECHNOLOGY

JUN 14 2004

RECEIVED

Re: Sites 1, 3 and Eastern Plume, Monitoring Event 23
 Naval Air Station, Brunswick

Dear Mr.Krivanski:

The Maine Department of Environmental Protection (MEDEP) has reviewed the draft "Monitoring Event 23 Report-October 2003 for Sites 1 and 3 and Eastern Plume, dated March 2004, prepared by EA Engineering, Science and Technology. Based on that review MEDEP has the following comments and issues.

Specific Comments:

1. Section 1.4.1, Sampling Activities, p. 6, 1st Paragraph:

"One monitoring well (MW-NASB-217B) was sampled utilizing the aqueous diffusion sampler ... but yielded insufficient water volume for low-flow sampling techniques, therefore, a sample for target Analyte List metals was unable to be collected."

This well should be re-developed, or else be replaced with a slightly deep screened well. Also, for clarity and consistency the well name is MW-217B, without the NASB. (RR & ED)

2. Section 1.6, Water Quality Indicator Parameter Measurements, p. 9, 1st paragraph:

"After the water quality indicator parameters stabilized, one set of reading was recorded on the field form."

This is an accurate statement as supported by Appendix E-2. However, standard protocol for low flow sample is at least three sets of readings recorded for each well during the stabilization process to provide data to support that the parameters actually did stabilize within the 10 percent sequential change requirement. This should also be the protocol for aqueous diffusion field parameter collection. These readings can be as short as one minute apart, if stabilization is known to occur rapidly, and the field data support this frequency of readings. If this is a concern with the Navy we should discuss it at an upcoming conference call or meeting. (RR/MTG)

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3. Section 2.1, Groundwater Extraction and Treatment System p. 13, 4th paragraph:

"The mass of VOCs removed was calculated based on the sum of the detected concentrations of the 9 VOCs included in the treatment plant operating permit issued by the Brunswick Sewer District in December 1994 (although total VOC removal is likely to be greater than shown)."

Please explain in the report why the Navy believes that total VOC removal has been underestimated as depicted in the graphs on page 14. (RR)

4. Section 2.1, Groundwater Extraction and Treatment System p. 14, graphs:

This page shows two graphs that appear to be identical. If this is true, please eliminate one of the graphs and, expand the remaining graph to fill the page (rotated sideways) to improve readability. If this not the case, please label the second graph appropriately. (ED)

5. Section 2.1, Groundwater Extraction and Treatment System p. 15, 2nd paragraph:

"As shown on the graphics above, the sum of the monthly VOCs removed reached 10.4 kg from the Eastern Plume between May and October 2003."

It is not evident without considerable work to verify the above value, and therefore, it appears that an intended graph is missing (since the two graphs shown are seemingly identical). Please substitute the correct graph, or delete the above statement. (ED)

6. Section 2.1, Groundwater Extraction and Treatment System p. 15, 3rd paragraph:

"The overall monthly VOCs removed from the Eastern Plume continue to show increasing rates of VOC removal from May through October 2003, although influent concentrations decrease through the end of 2003."

The graph shows that the influent mass, not influent concentrations which are not graphed in this report, decreased sharply in November and December 2003. This decrease is due to EW-04 going off-line. The above text statement needs to be revised for accuracy. MEDEP suggest the following language. "The overall monthly VOCs mass removed from the Eastern Plume shows a slight increase from May through October 2003, *however, the monthly mass removed decreased the last two months of the year due to EW-04 malfunctioning.*" (ED)

7. Section 2.1, Groundwater Extraction and Treatment System p. 15, 4th paragraph:

"The long-term reduction of VOC removed by the treatment plant suggests that the highest concentration areas of the Eastern Plume have been effectively targeted by extraction wells, and VOC concentrations in the plume have been significantly reduced."

MEDEP notes that the graph shows that both the monthly and cumulative VOC removal trends have been relatively steady after 1999. By far the largest influence was the two order-of-magnitude decrease in VOC in the EW-02A area upon startup of this well in June 1998. The EW-02A area is essentially the only hot spot that has been substantially reduced. Hot spots at P-106 and MW-331 remain, and have been targeted for new extraction wells. Also this statement does not take into account that only 4 extraction wells are currently pumping and one of those at limited capacity. The above Navy statement over-emphasizes the present overall state of the Eastern Plume and needs to be restated with a qualifier or deleted. (RR)

8. Section 2.3.1, Sites 1 and 3 – Volatiles, p. 17, 1st bullet:

“A low-flow samples was collected from this location during the May 2003 monitoring event.”

Please correct to reflect the October 2003 event (ME 23) as reported in this document. (ED)
9. Section 2.3.1, Sites 1 and 3 – Volatiles, p. 17, 2nd bullet:

“Low-flow data were not reported during Monitoring Event 23 due to a lack of appreciable water in the monitoring well.”

“... volatile concentrations for all of the contaminants of concern have decreased since Monitoring Event 23.”

Both of the above comments were left over from Monitoring Event 22; please delete. (ED)
10. Section 2.3.2, Sites 1 and 3 – Inorganics, p. 18, 1st bullet:

“Concentrations for chromium, iron, lead, manganese, barium and nickel have increased ...”

MEDEP notes that only the chromium increase is significant. Chromium was measured at 96.8 µg/L, and the MEG/MCL is 100 µg/L. (NR)
11. Section 2.3.2, Sites 1 and 3 – Inorganics, p. 18, 2nd bullet:

“Generally, concentrations for the contaminants of concern have decreased since Monitoring Event 22.”

Since a metals sample was not taken here during Event 22 (due to inadequate water for low-flow pumping), Event 21 is the correct comparison. Please correct. (ED)
12. Section 2.3.2, Sites 1 and 3 – Inorganics, p. 19, 1st paragraph:

“Since 2000, the concentrations for nickel and chromium have been steadily increasing.”

This statement is not accurate, and would be better presented as follows: “*Since 2002, the concentrations for nickel and chromium have remained at or near historical high levels.*” (ED)
13. Section 2.3.3, Eastern Plume – Volatiles, p. 19, 1st bullet:

“A sample was not collected during Monitoring Events 23 due to field error.”

Please correct by substituting monitoring events “21 and 22” for “23”. (ED)
14. Section 2.3.3, Eastern Plume – Volatiles, p. 19, 2nd bullet:

“Volatile concentrations (including total VOCs) have ranged from non-detect to approximately 60 µg/L since April 2002.”

Total VOCs have approached 60 $\mu\text{g/L}$ but have not declined to non-detect. Furthermore, several graphed compounds have remained at or near their detection limit. This statement is inaccurate and must be rewritten. MEDEP suggests the following language: "Volatile concentrations of individual VOCs have ranged from non-detect to approximately 35 $\mu\text{g/L}$ since April 2002. Total VOCs have reached approximately 70 $\mu\text{g/L}$." (ED)

15. Section 2.3.3, Eastern Plume – Volatiles, p. 19, 3rd bullet:

MEDEP notes that the concentration of benzene in MW-224 went from non-detect to 28 $\mu\text{g/L}$ (duplicate 29 $\mu\text{g/L}$) since the last monitoring event. In the last several years, benzene has rarely been detected, and has not exceeded its MCL/MEG of 5 $\mu\text{g/L}$ in the Eastern Plume. (NR)

16. Section 2.3.3, Eastern Plume – Volatiles, p. 19, 4th bullet:

The text should mention that total VOCs (even disregarding 9 $\mu\text{g/L}$ of acetone) is the highest concentration measured at MW-225A since 1997. (ED)

17. Section 2.3.3, Eastern Plume – Volatiles, p. 20, 2nd bullet:

"The concentration of 1,1-dichloroethene has increased since Monitoring Event 22, while ..."

The graph in Figure 76 Appendix C.4 does not show a data point for 1,1-dichloroethene for Monitoring Event 23. Please correct. (ED)

18. Section 2.3.3, Eastern Plume – Volatiles, p. 20, 4th bullet:

"The concentration of 1,1-dichloroethene exceeds the State MEG and Federal MCL."

The October 2003 exceedance by 1,1-dichloroethene is the second event in a row at MW-313, but the contaminant's concentration was higher during Monitoring Event 20. The Eastern Plume seems have turned eastward in the past few years, and may eventually discharge to Mere Brook in this area. The direct push investigation planned by the Navy for this area in 2004 should provide needed data. (NR)

19. Section 2.4.2.2 Sites 1 and 3 – Inorganics, p. 25, 4th bullet, Leachate Seep SEEP-05:

"Manganese concentrations have increased to a new high at 58,100 $\mu\text{g/L}$ from samples collected in October 2003. Arsenic concentrations have increased to a new high at 15,700 $\mu\text{g/L}$ from samples collected in October 2003."

Appendix C.4 graphs in Figures 126 and 127 show that both arsenic and manganese had much higher concentrations in October 2003 than any previous results since monitoring began in 1995. It is noted that pH was measured at 6.15 units and dissolved oxygen at 0.28 mg/L. Under such in-situ chemical environments, arsenic and manganese are commonly dissolved into groundwater from desorption of mineral coatings on soil grains. The reason for the low pH and very low dissolved oxygen apparently is unknown or else not reported. MEDEP believes the likely cause is changes in subsurface conditions emanating from Sites 1 and 3 immediately upgradient. MEDEP is concerned about this escalating arsenic and manganese leachate adjacent to Mere Brook above their Ambient Water Quality Criteria of 0.018 $\mu\text{g/L}$ and 50 $\mu\text{g/L}$ respectively. If this situation continues the Navy will need to consider the effectiveness of the remedy. (MTG)

20. Section 2.4.2.2 Sites 1 and 3 – Inorganics, p. 26, 1st bullet, Leachate Seep SEEP-09:

"Inorganic concentrations, with the exception of manganese, are generally within the historical range ... (excluding two spikes in arsenic at approximately 12,500 µg/L and 5,190 µg/L during 2002 and October 2003 sampling events, respectively). Manganese concentrations have increased to a new high at 10,400 µg/L from samples collected in October 2003."

SEEP-09 is close to and downgradient of SEEP-05, as discussed in comment 19. The pH at SEEP-09 was low (5.64 units) and the dissolved oxygen was very low (0.20 mg/L). The coincidence of record highs of manganese and arsenic at both locations and depressed pH and DO levels are further evidence that these seeps are within a migration path that passes through the gap in the slurry wall on the south in the direction of Mere Brook. MEDEP is concerned about this escalating arsenic and manganese leachate adjacent to Mere Brook above their Ambient Water Quality Criteria. If this situation continues the Navy will need to consider the effectiveness of the remedy. (MTG)

21. Section 2.5, Natural Attenuation Sampling Program, Introduction p. 29, bullets:

There appears to be two references combined into the first bullet. The first is seemingly a repeat of bullet 3. The second reference (Parsons Engineering and U.S. Geological Survey 1998) is missing from the list of report references. Please make the appropriate corrections/additions. (ED)

22. Section 2.5, Natural Attenuation Sampling Program, Introduction, paragraph spanning pages 29/30:

The contaminant degradation scenario presented does an injustice on two aspects that are important. First of all, the petroleum fraction of the initial contamination at the Fire Training Pit source area had to have been instrumental as electron donors that greatly accelerated degradation of the chlorinated hydrocarbon parents (PCE, TCE, and 1,1,1-TCA) once aerobic respiration had run its course. Thus, the initial abundance of BTEX compounds in groundwater, followed by their consumption, made possible the later magnitude of microbial reduction of the parent chlorinated compounds (referred to as Type I behavior). Secondly, a large portion of the mass of parent compounds have been transported thousands of feet downgradient, where most of the degradation compounds have been observed at or near the leading edge as it migrates. The in situ oxygen at the leading edge is naturally high enough to cause oxidation of daughter products. The travel distance of DCE appears much less than that of TCE and PCE. These aspects need to be incorporated into the degradation conceptual model presented in the Introduction. (RR)

23. Section 2.5.2, Natural Attenuation Parameter Results and Discussion, p. 30, 4th paragraph:

a) "Background levels of dissolved oxygen at locations MW-1104 were 1.30 mg/L, while Eh was 152 mV."

MEDEP questions whether this well at this location is an appropriate background reference well for natural attenuation evaluation. The following reasons for finding a different background well are:

- dissolved oxygen, and possibly Eh, are significantly lower than typical values for shallow and deep groundwater outside the historic plume footprint;
- groundwater at MW-1104 was moderately contaminated by the FTA plume in 1995-96, and soil adsorption may yet be affecting the subsurface environment; and

- this well is screened shallow (15 to 25 feet bgs) within the upper sand unit, which is coarser than the much deeper lower sand unit where the mass of the plume resides. The choice of background wells for the natural attenuation should be discussed at the next Technical Meeting. (MTG)

b) "Sulfate and chloride analysis yielded concentrations of 20,000 and 17,500 mg/L respectively."

The units for these values are $\mu\text{g/L}$, not mg/L, according to Appendix H-13, report page 85 and Table B-5. (ED)

24. Section 2.5.2.1, Chlorinated Compounds, p. 31, 1st paragraph:

"Parent compounds include PCE and 1,1,1-TCA (Figure 2)."

a.) TCE should also be considered an original source parent compound, although some TCE likely is present as a daughter compound of PCE. (ED)

b.) The reference to Figure 2 is a mystery. Please delete this reference. (ED)

25. Section 2.5.2.1, Chlorinated Compounds, p. 31, 2nd paragraph:

"The spatial distribution of these daughter product compounds reported in October 2003 sampling data is provided on Figures 12 and 13."

The spatial distribution for perhaps the most important breakdown product, 1,1-DCE is not shown, and there are nine exceedences shown in Table B-3. Please add the distribution for 1,1-DCE on a figure. (ED)

26. Section 2.5.2.1, Chlorinated Compounds, p. 32, Chloride:

For clarity and consistency please change MW-212 to its correct historical designation (MW-NASB-212). (ED)

27. Section 2.5.2.1, Chlorinated Compounds, p. 32, Dissolved Oxygen:

"Depleted concentrations of dissolved oxygen were reported in 5 of the monitoring wells sampled for natural attenuation parameters (MW-207AR, MW-313, MW-330, MW-333, MW-334). The reported depleted dissolved oxygen levels also correlate with the presence of methane and PCE breakdown products..."

MW-330 does have very low dissolved oxygen, but chlorinated solvents and methane were not found, according to Tables B-3 and B-5. Please delete this well from the above statement. (ED)

28. Section 2.5.2.1, Chlorinated Compounds, p. 32, Nitrate:

Please change the units for nitrate given for MW-1104 to $\mu\text{g/L}$ to agree with Table B-5 and Appendix H-13. (ED)

29. Section 2.5.2.1, Chlorinated Compounds, p. 33, Sulfate:

Please change the units for sulfate given for MW-105A and MW-1104 to $\mu\text{g/L}$ to agree with Table B-5 and Appendix H-13. (ED)

30. Section 2.5.3, Natural Attenuation Screening Process, p. 33, 1st paragraph:

a.) A weighted score was established for individual groundwater sampling locations for the October 2003 sampling data at the Eastern Plume. These scores were then compared and contrasted with the score for background conditions at the location of MW-1104."

MEDEP questions whether MW-1104 is an appropriate background data set for comparison. See Specific Comment 23.a above. (RR)

b.) "The results of the screening evaluation are listed in Table 18."

There are errors in the units given for some parameters, and units are not given for other parameters. Please correct. (ED)

31. Section 2.5.3, Natural Attenuation Screening Process, p. 33, 2nd paragraph:

"In addition, weighted scores indicated that there is limited evidence of chlorinated VOC biodegradation for 6 remaining monitoring locations that were assessed. These locations included MW-205, MW-230A, MW-332, MW-NASB-212, P-111 and P-106."

Some of the above listed wells will change categories when the well data are correctly evaluated using Table 17. Table 18, which is the basis of the above statement, has the following problems that affect the application of the EPA scoring methodology:

- A negative 3 points should only be awarded when dissolved oxygen exceeds 5.0 mg/L, not 0.5 mg/L. MW-105A, MW-1104, MW-230A, MW-319, MW-NASB-212, MW-330, and P-111 will all receive 3 additional points each.
- No points should be awarded for the presence of 1,1,1-trichloroethane, as it is not a daughter product. MW-205A, MW-229A, MW-306, MW-332, and P-106 will all lose 2 points each.

The overall MNA assessment for the Eastern Plume may change once these corrections are made. Isocontour maps based on natural attenuation scores for the selected wells sampled likely will require modification. (ED, RR)

32. Section 3.1, General Conclusions and Recommendations, p. 35, 1st bullet:

"However, continued increases in concentrations at MW-331 in 2003 have been noted and this well is currently the monitoring point with the highest total VOC concentrations. These increases suggest an area of increased VOC contamination is moving south; and, during 2003, the center of mass of the Eastern Plume moved from P-106 to MW-331."

Movement of the center of mass between P-106 and MW-331, a distance of 1200 feet, requires that the northern and southern regions of the Eastern Plume connect. The statement at the bottom of page 33 says that the chemical data does not exist to support a connection. At this time, MEDEP cannot endorse the concept that significant mass has migrated from P-106 to MW-331. The increase in concentration at MW-331 could be due to a long-decline in pumping rate at EW-02A and EW-01, resulting in contamination no longer being "pulled" from the MW-331 area. MW-331 is 600 feet from EW-02A, which at one time had a contoured radius of hydraulic influence over a 200 feet. The contaminant graph in Figure 133 (Appendix C-4) shows a general decline in VOC concentrations at P-106 over the last four years, with a leveling trend after the fall of 2002. At MW-331, the fall 2003 VOC

concentrations are not as high as in the fall of 2001 and the fall of 2002, therefore, contaminant mass has not been accumulating here.

MEDEP has agreed with the recommendation to investigate the placement of new replacement extraction wells in the P-106 and MW-331 areas. (RR)

33. Section 3.1, General Conclusions and Recommendations, p. 35, 2nd Conclusion:

MEDEP agrees with the conclusion and recommendation presented in this bullet. Please add the bullet symbol next to "Conclusion" (ED)

34. Section 3.1, General Conclusions and Recommendations, p. 36, 1st bullet:

MEDEP agrees with much of the conclusion, but cautions that the VOC plume may travel beneath Mere Brook for some distance rather than discharge to the stream at MW-313. The recommended one-time expansion of surface-water sampling should be delayed until the geologic and chemical data from the 2004 field investigation in this area are available and integrated into the site conceptual model. (RR)

35. Section 3.1, General Conclusions and Recommendations, p. 36, 2nd bullet:

"Based on the data collected to date, the remedial measures completed at Sites 1 and 3 appear to be effective in preventing significant impacts from the Sites 1 and 3 landfill."

The key word in this statement is "significant". Migration of various metals in groundwater beyond the landfill boundary continues to occur through the southeast gap in the slurry wall. Aluminum, arsenic, and chromium (duplicate sample) exceed their respective MEGs at one or more monitoring wells outside the source area this monitoring event. Iron and manganese concentrations have greatly exceeded their secondary MCLs at some wells. Aluminum, arsenic, cadmium, iron, manganese, silver and thallium are moderately to highly elevated at two aqueous seep sampling locations. These seeps (SEEP-05 and SEEP-09) are located close to Mere Brook, indicating a substantial distance of travel away from the landfills. The last sentence of the conclusion needs to be deleted, or transformed into proper perspective using comparisons between source area and downgradient contaminant levels. (RR/ED)

36. Section 3.1.1, Extraction System, p. 36-37, 1st bullet:

"The extraction well network appears to have limited effectiveness at maintaining hydraulic control of the Eastern Plume..."

It should also be noted that the extraction network is operating in a reduced capacity. (ED)

37. Section 3.1.1, Extraction System, p. 37, 1st bullet:

MEDEP supports the proposal to eliminate the potential for cross-aquifer contamination by either properly abandoning EW-01, and replacing this well with a more appropriate well design and location. Prior to abandonment, a determination of water flow within the very long well screen needs to occur. A finding of appreciable flow may provide valuable insight into the expansion of the Eastern Plume (mainly daughter products) eastward of EW-01 into the MW-313 area. (RR)

38. Figure 7, Interpreted Deep Groundwater Potentiometric Surface Contour Map:

The 21-foot contour is incorrectly in two places in the southern boundary area. The 21-contour on the north side of Mere Brook has to dip southward and encompass the EP wells surrounding EW-01. A small circular 21-contour representing a depression surrounds EW-01 (shown in Figure 8). The 21-contour on the south side of Mere Brook must pull away from MW-229A to a position just north of MW-230A. (ED)

39. Figure 8, Extraction Well Detail Map, 7 and 8 October 2003, Deep Potentiometric Surface:

EW-02A was pumping at a rate of 5 gpm during October. As discussed in prior Monitoring Event reports, a contour diagram for this extraction well should be shown in this figure. (ED)

40. Figure 12, PCE, TCE, 1,1,1-TCA Concentration Isocontours:

The method used to construct the isocontours for the three maps needs to be named. Please explain the rationale behind the unusual numerical ranges assigned to the four categories for each map (e.g., 60-137, 138-206, 207-240, 241-310). These maps vividly illustrate the lack of interior sampling points between the P-106 and MW-331 hot spots. Another interesting new feature is the tongue of clean water that has penetrated to former interior well MW-207AR. (RR)

41. Figure 13, 1,1-DCA, 1-2, DCE, and Methane Concentration Isocontours:

The method used to construct the isocontours for the three maps needs to be named. Please explain the rationale behind the unusual numerical ranges assigned to the four categories for each map (e.g., 35-106, 107-177, 178-248, 249-320). (RR)

42. Figure 14, Isocontours of Monitored Natural Attenuation Scoring:

MEDEP does not agree with how the isocontours are depicted in the southern area of the Eastern Plume for the following reasons and therefore it needs to be revised.

- The MW-105A/B wells, which are not contaminated, have been shown to be too shallow to represent the Eastern Plume therefore MW-105A/B should be eliminated from this figure.
- The area surrounding MW-205 belongs in the green dotted unit (>5-14).
- Table 18 contains errors (See Specific Comment 47 below).

Once these changes have been made most of the southern plume region will then be above 5 MNA points. (ED)

43. Table 4, Monitoring Well Gauging Summary for 2-3 October 2003:

MW-207AR is noted as replacing MW-207A. Please state when the new well was installed, and where a well construction log can be viewed. The gauging data indicates "artesian well". What magnitude of flow is observed when the riser is uncapped? Is there any leakage of groundwater when the well is capped between visits? (RR)

44. Table 6, Summary of Water Quality Indicator Parameters Measured in Low-Flow Groundwater Samples:

Data for MW-219 shows a pH of 4.90 units. This is a very low value for deep groundwater that is 500 feet downgradient of Site 1 and 3 landfills. MEDEP notes that the Weapons Compound is located several hundred feet upgradient of MW-219. The next lowest value

reported in this table is 5.12 units at MW-2101, which is close to the landfills, but upgradient. It would appear that the pH meter was not properly calibrated. If possible please provide an explanation and provide information as to when this pH meter was calibrated. (RR)

45. Table 8. Summary of Water Quality Indicator Parameters Measured in Aqueous :

An unexpected number of the reported field measurements made October 2-15 are significantly different from the same measurements made October 21-22 (Table 10) during field data collection for the natural attenuation assessment. It seems unlikely that specific conductance would change 2 to 4 fold, dissolved oxygen would increase or decline 7 to 8 mg/L, or pH change as much as 1 unit. It is an accepted fact that field instruments occasionally lose their calibration, and some variation between instruments should be expected. Another factor is that the earlier set of samples was collected via diffusion bags and the later set using low-flow pumping. Of most concern for assessing natural attenuation is having confidence that the dissolved oxygen readings are reliable. The Navy needs to state which collection method they believe provide the most representative data, and their rationale. (RR)

46. Table 12. Summary of Water Quality Indicator Parameters Measured in Surface Water...:

a.) The pH of sample SW-8 is reported at 5.10 units. This is an extremely low value for Mere Brook water. It is also noted that SW-8 is not far downgradient of MW-219, where the pH was reported in Table 6 as 4.90 units. If these readings are accurate this alignment of locations makes MEDEP increasingly suspicious that a recent-pulse or release has occurred at the Weapons Compound or the Site 1 & 3 landfills. Please check into when the pH meter was calibrated and any other outside influence that may have effected the pH. In the future if pH readings are less than 5.0 units they should be rechecked immediately and, if necessary, the equipment recalibrated. If these low values are obtained during Monitoring Event 24, further investigation may be required. (RR)

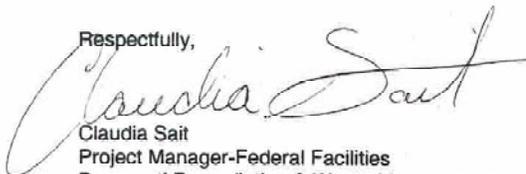
b.) The 35.66 mg/L for dissolved oxygen is also in error. Please correct. (ED)

47. Table 18. Results of Natural Attenuation Parameter Screening ...:

A number of errors occur in this table. Please see Comment 42. Corrections will result in new score totals for many of the wells. (ED)

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

Respectfully,



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

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Cf: File
Larry Dearborn-DEP
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Carolyn Lepage-Lepage Environmental
Al Easterday-EA
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NOTE: Each comment is followed with a code that indicates whether a response is required (RR), no response is required (NR), editorial correction needed (ED); or meeting discussion requested (MTG). No response is required for editorial corrections unless the Navy disagrees with the correction.