



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

April 18, 2007

Mr. Orlando Monaco
Department of Navy
Base Realignment and Closure
Program Management Office-Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Sites 1, 3 and Eastern Plume, Revised Summary-Long Term Monitoring Program
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

Pursuant to Section VI of the Naval Air Station, Brunswick, Maine Federal Facility Agreement (Oct 1990), as amended, the Maine Department of Environmental Protection (MEDEP) has reviewed the revised "Summary of the Long-Term Monitoring Program at Sites 1 and 3 April 2007 Sampling Event" (Table 1-2) the revised "Summary of the Long-Term Monitoring Program at Eastern Plume April 2007 Sampling Event" (Table 1-3), dated April 17, 2007, prepared by Environmental Chemical Corporation. Based on that review MEDEP has the following comments and issues.

MEDEP's concurrence of the revised Long Term Monitoring Program, once the errors and omissions are corrected, is for the Monitoring Event 30 (Spring 2007) only. The Navy must finalize the draft final Long Term Monitoring Program for Sites 1 and 3 and the Eastern Plume prior to the September 2007 monitoring event, otherwise the Long Term Monitoring Program will default to the LTMP (EA 2000) with modifications for new wells, monitored natural attenuation parameters, passive diffusion bags and 1, 4 dioxane. Approval for this monitoring event is no guarantee of approval for the final Long Term Monitoring Program.

Sites 1 and 3:

Per MEDEP's letter of April 13, 2007, MW-202B must be added to the bi-annual gauging unless a valid reason can be provided why it should not be included.

Eastern Plume:

The following comment was overlooked in the April 17, 2007 revision. Are the extraction wells sampled by low-flow methods or from a tap off the extraction pump? If from a tap the Sampling Method should be "grab". Please note on table.

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The proposed passive diffusion sampling locations and low flow sampling for MW-335, 337, 338 (A, B & C), and 339 do not match the 2004 optimization or the 2006 draft final Long Term Monitoring Program, which recommend passive diffusion sampling intervals of shallow, middle, deep and low flow sampling. MEDEP assumes that the Navy has the data to justify the proposed PDB locations and will provide it, if necessary. If that is not the case, then these wells will need to be sampled per the 2004 optimization plan. The passive diffusion sampler must target the interval with highest VOC detection and if the well is non detect then it is the middle interval.

Please contact me at (207) 287-7713 or claudia.b.sait@maine.gov, if you have any questions or comments.

Respectfully,

A handwritten signature in black ink that reads "Claudia Sait". The signature is written in a cursive, flowing style.

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

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