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OPTIONAL FORM 99 (7-80)

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of pages ▶ 3

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GENERAL SERVICES ADMINISTRATION			

October 26, 1993
File #965

Ms. Loukie Lofchie
Brunswick Area Citizens for a Safe Environment
P. O. Box 245
Brunswick, ME 04011

Subject: Review of "Draft Final Technical Memorandum, Site 9, Neptune Drive Disposal Site",
Naval Air Station Brunswick, Brunswick, Maine, September 1993.

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc. (RGGI), has reviewed the "Draft Final Technical Memorandum, Site 9, Neptune Drive Disposal Site" for Naval Air Station Brunswick, Brunswick, Maine, dated September 1993. The document was prepared by ABB Environmental Services, Inc., (ABB) for the U. S. Department of the Navy for the Naval Air Station Brunswick (NAS Brunswick) located in Brunswick, Maine. The subject document is intended to summarize site investigation activities and make recommendations for future actions at the Neptune Drive Disposal Site.

Site 9, also known as the Neptune Drive Disposal Site, is located in the central portion of NAS Brunswick. The site initially included three areas of potential contamination: a former incinerator location and ash disposal area; an area reportedly used for burning and disposal of solvents; and two streams exhibiting iron-staining characteristic of leachate. Results of earlier environmental investigations were reported in the August 1990 Draft Final Remedial Investigation (RI) and the April 1991 Draft Final Supplemental RI reports prepared by E. C. Jordan.

The subject document presents a summary of investigations and analysis conducted through 1993, and recommendations for future activities at the site. We commented on the June 1993 version of the subject document in our letter to you dated August 10, 1993. Several of the issues and concerns we raised in our August 10th letter remain, particularly those related to source identification. We have summarized our comments and concerns in the following:

1. **General Comment.** The primary focus of the recent investigation activities conducted at Site 9 has been on field evaluations and environmental sampling related to the ash landfill and the septic system at Building 201. As the Navy has concluded that neither of these two areas

Page 2, Draft Final Site 9 Technical Memorandum,
October 26, 1993, File #965

is the current source of the low levels of volatile organic compounds (VOCs) detected at Site 9, additional investigations of other current and historic potential sources should be conducted at this time. For instance, it is our understanding that there is an auto hobby shop relatively close to and upgradient of Site 9. Several flightline buildings are also located upgradient of Site 9. These and other potential source areas should be investigated as the possible sources of the VOCs. The investigations could be conducted concurrently with the implementation of groundwater monitoring, with the understanding that the monitoring plan might be modified to accommodate new information. Additional field investigations might also be necessary to further evaluate the environmental effects of any new potential sources.

2. **General Comment.** We reiterate comments we made in our August 10th letter concerning the need for additional data to determine more precisely the direction of groundwater flow, the relationship of groundwater to streamflow in the two unnamed tributaries, the effect of the former stream channel and the former drain location on groundwater flow and contaminant migration, and seasonal variations of the hydrologic system. Hydrogeologic data gathered in the course of the proposed quarterly monitoring should be presented in the form of water level contour maps and other appropriate forms for review on a regular basis (annually at a minimum). The results of the data analysis and compilation may indicate a need to modify assumptions concerning the groundwater flow regime and/or conduct additional field investigations. For instance, additional data may indicate monitoring well MW-916 cannot be considered a background well.

3. **Page 3-1, for example.** It is misleading to characterize the occurrence of VOCs in groundwater samples collected at Site 9 as "sporadic". Rather, the *collection* of samples has been sporadic (six times over the past five years). Rather than continue to speculate with the limited data currently available, we feel that the regularly scheduled (quarterly, for example) collection and analysis of environmental samples from existing sampling locations should be initiated in a timely fashion, while additional investigations (such as for potential sources) should be conducted concurrently. The possibility of the concurrent actions was presented by Jim Shafer (Navy Northern Division) at the September 23, 1993 TRC (Technical Review Committee) meeting. Perhaps an interim action, mentioned in the EPA's August 11, 1993 comment letter (Appendix D), would be appropriate for Site 9. There seems to be general agreement among the parties providing technical comments and responses to comments that additional environmental data is needed to determine a long-term plan for Site 9. An interim action could all w the collection of the environmental data from existing sample locations to begin and accommodate new information generated during concurrent investigations, such as the evaluation of additional potential sources.

4. **Pages 5-1 - 5-3.** While we agree with the proposed on-going monitoring of groundwater quality in the existing wells at Site 9, we cannot agree that there is no continuing source of VOCs at the site based on currently available information. The occurrence of VOCs in groundwater samples indicates there may be more than one source. Additional investigations

Page 3, Draft Final Site 9 Technical Memorandum,
October 26, 1993, File #965

should be conducted, both north and south of Neptune Drive, to respond to the questions and comments outlined above and to identify the source or sources. Once the source(s) is (are) identified, additional remedial actions should be evaluated. Institutional controls should also address the excavation and removal of the ash landfill should any construction occur in the barracks area.

5. **Appendix D.** In response to our comment #16 in our August 10th letter concerning the evaluation of radioactive hazards at the site, the Navy described the instrument used during investigations at Site 9, and stated that "readings above background were not noted during the survey". However, we are uncertain how background levels were determined. Please provide specific information concerning how background levels for radioactive hazard evaluation were determined.

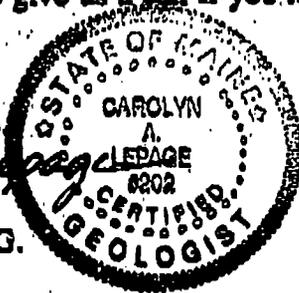
6. **General Comment.** The subject document was discussed during a conference call on October 21, 1993, by representatives of the Navy, U.S. Environmental Protection Agency (EPA), and Maine Department of Environmental Protection. We were initially contacted by Bob Lim of the EPA at 2 PM on October 21st to participate in the conference call that was to start an hour later at 3 PM. We indicated we would need to contact a BACSE representative to authorize us to actively participate in the conference call, but at a minimum, we could listen to the conversation and ask questions. However, we never received the conference call. We also understand that Mr. Lim contacted Susan Weddle (BACSE) after he contacted us, and that she did not receive his message until that evening. We are concerned that BACSE did not receive information in a timely fashion about the conference call from either the Navy or EPA. As a result, BACSE was left out. In addition, we had indicated our interest in participating in the call, but RGGI was also left out. It was our understanding that the same parties involved in the conference call regarding the June 1993 version of the subject document were to participate in the latest conference call. Sufficient notice should be provided to allow BACSE and its representatives to participate in a constructive manner.

Please do not hesitate to give us a call if you have any questions on the comments above.

Sincerely,
Robert G. Gerber, Inc.

Carolyn A. Lepage

Carolyn A. Lepage, C.G.
Director of Operations



Andrews L. Tolman

Andrews L. Tolman, C.G.
Chief Hydrogeologist