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June 29, 1994
File #965

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

Subject: Review of Draft Long Term Monitoring Plan: Site 9, Neptune Drive Disposal Site, Naval Air Station Brunswick, Brunswick, Maine, June 1994.

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc. (Gerber), has reviewed the *Draft Long Term Monitoring Plan: Site 9, Neptune Drive Disposal Site* for Naval Air Station Brunswick, Brunswick, Maine, dated June 1994. The document was prepared by ABB Environmental Services, Inc., (ABB-ES) for the U. S. Department of the Navy for the Naval Air Station Brunswick (NAS Brunswick) located in Brunswick, Maine. In the subject document, the Navy proposes sampling and reporting activities in support of their proposed interim remedial action to address groundwater contamination 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: the location of a former incinerator and an associated 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 B. C. Jordan. The September 1993 *Draft Technical Memorandum for Site 9* presented a summary of investigations and analysis conducted through 1993, and recommendations for future activities at the site. Several of the issues we raised in our review of the September 1993 and earlier versions of the Technical Memorandum have been broached at subsequent meetings of the Technical Review Committee, and remain outstanding.

We recently reviewed the May 1994 *Draft Proposed Plan for Site 9* that presented the Navy's preferred alternative for an interim remedial action for groundwater at Site 9. The proposed interim action includes groundwater remediation by natural attenuation, implementation of institutional controls to prevent human exposure, and long-term monitoring of groundwater, surface water, and sediments to evaluate changes in environmental quality. We presented our comments on the draft proposed plan in our letter to you dated June 15, 1994.

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The subject document addresses the environmental monitoring portion of the proposed remedial alternative. The purpose of the long term monitoring plan, as stated on page 1-3, is to "characterize the groundwater and surface water quality on-site and downgradient of Site 9 and identify contamination, if any, associated with past disposal activities at the site", as well as "better establish the presence/absence and concentrations of contaminants which have been sporadically observed during past sampling events". Our comments on the proposed monitoring plan are as follows:

1. Page 1-1. It is not clear where the former base landfill, described in Section 1.0 as being located north of Neptune Drive, is located. Figure 1-2 on page 1-6 shows the approximate locations of both the old incinerator and the ash disposal area (also described on page 1-1 as located north of Neptune Drive), but does not show the location of a former base landfill.
2. Page 1-4. There are four, not three, concepts enumerated in the first paragraph. The additional investigations described in the third concept should also characterize groundwater and possibly surface water quality in potential source areas.
3. Page 1-4. The second sentence in the second paragraph should reflect that the decision to terminate the monitoring program and proceed to a final ROD (Record of Decision) will be based on the five-year review of the program and the results of the additional investigations the Navy intends to conduct to identify potential sources at Site 9. The fourth sentence should be revised to indicate the five-year program and/or the results of the additional investigations the Navy intends to conduct at Site 9 may drive additional actions at the site.
4. Page 3-1. The Long Term Monitoring Plan for Site 9 should be a "freestanding" document in that it should include major components, such as the Quality Assurance Project Plan and the Health and Safety Plan, as appendices rather than reference an earlier document that applies to a completely different location.
5. Page 3-1. The description of monitoring locations in Section 3.1 should reference the total number of monitoring wells at Site 9 and include a justification for excluding wells. In addition, the description of several of the wells selected for monitoring as "within" the site boundaries, or upgradient and downgradient of the site, implies that the boundaries of Site 9 are well-defined and include all known sources. There is not sufficient data at this time to determine the areal extent of the site. The additional investigations the Navy intends to conduct should help define any potential sources as well as any environmental quality issues related to current or historical source areas.
6. Page 3-4. Where and when will the specific sampling methods and procedures be presented for review and approval by the appropriate entities. The issue of low-flow sampling has been

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discussed at several TRC (Technical Review Committee) meetings. What measures will be employed to minimize the volatilization of contaminants, vinyl chloride in particular, during sample collection.

7. Page 3-4. Will the quarterly sampling schedule coincide with typical seasonal high and low groundwater conditions. What is the anticipated date that sampling would begin.

8. Page 3-4. The quarterly sampling procedures should include collection of water level measurements from all existing monitoring wells at Site 9. The data analysis and review performed every five years should include evaluation of the water level measurements collected.

9. Page 3-6. The meaning of the next-to-last sentence on the page is unclear.

10. Page 3-7 & 3-8. Section 3.5 should be revised to reflect that the monitoring program duration and modification may be affected by the results of the additional source investigations the Navy intends to conduct at Site 9.

11. A glossary of abbreviations and acronyms similar to those included at the end of other NAS Brunswick documents prepared by ABB-ES would be helpful.

12. General Comment. There are a number of issues we raised in our comment letter dated June 15, 1994, concerning the May 1994 Draft Proposed Plan for Site 9 that remain unanswered at this time, such as how contaminants detected in stream sediments would be handled. Because of the extensive comments received from the various reviewers, the proposed plan is currently being revised and will be submitted to TRC participants for review and comment. Depending on the nature and extent of the revisions, we may have additional comments concerning the activities proposed for Site 9, including long term monitoring.

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



ROBERT G.
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