



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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July 1, 1994

Mr. Fred Evans
Project Manager, Code 1821
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, Penn. 19112-2090

RE: Draft Long Term Monitoring Plan, Site 9, Neptune Drive Disposal Site, dated June 1994, Brunswick Naval Air Station, Brunswick, Maine

Dear Fred:

The Department has received and reviewed the Site 9 Draft Long Term Monitoring Plan for NAS, Brunswick dated June 1994. The Department's comments are provided below.

1. Page 1-4, ¶ 2, second sentence: What determines if the monitoring program is terminated? Can a termination occur before the first 5-year review? .
2. Figure 1-2: Please include a smaller scale map in addition to Figure 1-2. The smaller scale map should show and label all buildings surrounding Site 9, specifically: all buildings east of the runway, all monitoring wells associated with the PX Gas Station, all areas north of Building 52, and west of sample point SW-922.
3. Page 1-7, ¶ 2, second sentence: The landfill contains material other than just ash. The IAS Study identified Site 9 as a former base landfill and a disposal area for metal wastes associated with the metal shop.
4. Page 1-7, ¶ 2, second sentence: If the two streams are contaminated because they have received leachate from the landfill or from another source at Site 9, the streams must be investigated and remediated as part of Site 9 under CERCLA.
5. Page 1-8, Title: Please change "Ash Landfill" to "Landfill".
6. Page 1-8: The IAS identifies the landfill as the "first dump area used at the Air Station." The IAS states, "For a while it was the main Air Station disposal area... At least some direct disposal of solid waste took place during the 1950's." Direct evidence collected to date confirms that un-incinerated solid waste exists in the landfill.

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7. Page 1-9, ¶ 1, last sentence: Please supply supporting information for the statement that, "the drain was reportedly removed and filled during construction of the barracks". The only information submitted to date is a figure showing the drain pipe with the words "to be removed" printed along the drainpipe.
8. Page 1-10, Section 1.3: The text should present all the data from previous investigations together. Separating the previous investigations is very confusing to the reader. All tables and figures must combine the information for all previous investigations.
9. Figure 1-3: Figure 1-3 shows work that was completed in 1993, but those investigations are not mentioned in the text on page 1-10.
10. Page 1-17, ¶ 1, sample location SW-915: The Navy should consider sample location SW-915 as an on-site sampling location. Seasonal groundwater directions are unknown. Groundwater from Site 9 may be discharging at SW-915.
11. Page 1-32, ¶ 2, fifth sentence: The Department does not accept MW-916 as a background location.
12. Page 3-1, ¶ 1: Additional language is necessary to indicate that all new monitoring wells installed as part of the additional investigative work for Site 9 will be sampled and analyzed as part of this plan. The number of wells, their approximate location, and frequency of monitoring must be indicated.
13. Page 3-1, ¶ 2: Please include a figure that shows all proposed sampling points. This figure should show the analytes to be sampled for and frequency of sampling for each location.
The monitoring plan must include sample locations MW-902, MW-905, SD-901, SD-920, and SW-920 for analyses. Data collected to date is inadequate to justify eliminating sampling points.
14. Page 3-4, ¶ 2: Previous discussions with the Navy included using specific down hole sampling procedures for VOC sampling. The LTMP does not mention any procedures for collection of groundwater. The text should include specific sampling procedures. Is there any flexibility that allows for amendments to the sample procedures based on performance evaluations and technology advances? The LTMP should provide specific performance requirements for the selected sampling procedures.
15. Page 3-5, ¶ 1: This should be a stand-alone report. The Data Quality Objectives should be included in this report. The final LTMP for Sites 1, 3, Building 95, and the Eastern Plume hasn't been accepted at this date.
16. Page 3-4, ¶ 2: The text should include a statement that the water level in every monitoring well will be measured and recorded during every sampling event.

17. Page 3-5, ¶ 2: Provide justification for the use of SW 846 protocols versus CLP procedures for characterizing groundwater chemistry at Site 9. The text should include a description of how the field parameters will be collected. All field parameters must be collected continuously during purging and after sampling is complete. Include how the field parameters will be reported and used by field personnel and in the performance evaluations.

18. Table 3-1, note 3: Include a figure identifying each monitoring point. The figure should show the frequency of measurement. Future reports must include a water table map.

19. Table 3-1, note 4: Note 4 should include water level measurements as a field parameter. Field personnel must record the water level during purging and sampling.

20. Page 3-6, ¶ 2, last two sentences: If conditions exist that cannot be corrected with the chosen purging and sampling techniques, alternative techniques must be chosen and implemented.

21. Page 3-8, ¶ 3: The final LTMP for Building 95, Sites 1 and 3, and the Eastern Plume has not been accepted by the Department. The LTMP for Site 9 should be a stand-alone report.

Section 3-6 must include a complete discussion of data reduction, validation, and reporting. The report should include a discussion about how GRIT/STAT will be used. Minimum data requirements for the specific statistical analyses must be presented. The text should include a discussion of how the Data Quality Objectives will be maintained during the sampling, analytical, and reduction stages. The specific statistical procedures must be presented to insure that the proposed sampling plan will meet the minimum requirements.

Section 3.6 must include a discussion of data validation. The report should discuss how the data will be reported. Figures must be included in the reports with complete data tables. All the data must be included on a computer diskette. The computer file must include all sample results. The database must use the most current EPA notation.

Please call me with any questions or comments.

Sincerely,

Nancy Beardsley

Nancy Beardsley
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