



STATE OF MAINE

# DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NAS BRUNSWICK  
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September 8, 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 Final Long Term Monitoring Plan Site 9, dated August 1994, Brunswick Naval Air Station, Brunswick, Maine**

Dear Fred:

The Department has received and reviewed the Draft Final Long Term Monitoring Plan at Site 9 for NAS, Brunswick dated August 1994. The Department has also included some comments on the Navy's responses to our comments on the Draft LTMP. The Department's comments are provided below.

## General Comments

1. I would like to schedule a meeting to discuss AWQC and how AWQC are applied in the State of Maine. The Department has commented on AWQC in many review comments over the past year, but our comments have not been adequately addressed. I want to get this issue resolved ASAP. I will ask Barry Mower from our Bureau of Water Quality to present the State's position on AWQC. Please let me know when it would be convenient to meet.

## Specific Comments

2. Table 1-2: CWA Water Quality Criteria include criteria for the protection of human health and criteria for the protection of freshwater aquatic life. Why hasn't the human health criteria been included in this table?

3. Page 2-1: Natural attenuation will result in diminishing contaminant concentrations if you make the assumption that there is not an on-going source that is contributing to the contamination.

*Serving Maine People & Protecting Their Environment*

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4. Page 2-1: EPA should base its five year reviews on actual field conditions and not on the implicit assumption that natural attenuation will reduce contaminant concentrations. We don't know what, if any, the source areas are for Site 9, therefore, we can only assume that contaminant concentrations will decrease. It seems that the long term monitoring program hinges on five year reviews to determine the next plan of action at the site. I don't believe that five year reviews should be a discretionary requirement based on natural attenuation. I would like to see a further explanation from EPA or the Navy that explains EPA's interpretation of the Statutory Review in relation to Site 9 long term monitoring. Attachment I has not been included in this Report.

#### Comments on Navy response to Draft comments

Response 10: What is the basis for considering SW-915 as an upstream sampling point. The groundwater contours presented in past reports indicated that groundwater discharges in the area from Site 9.

Response 11: The Department does not accept MW-916 as a background well for reasons that have already been explained in detail. In the Navy's response to Department comments dated December 8, 1993, the Navy proposed to install and sample a new monitoring well in the vicinity of the southeast corner of Building 215, and perform a soil boring in the area of T-23 and MW-916. However, Figure 3-1 of the Draft Work Plan shows that a new upgradient monitoring well will be installed directly north of MW-916. Please clarify.

Response 12: At a minimum the Navy must include the additional wells as water level monitoring points, and evaluate after sampling whether these wells should be included in the LTMP.

Response 13: The Department's approach is to include all monitoring wells in the LTMP until sufficient data exists to justify the elimination of sampling points. USEPA comment number 19 does not discuss MW-905.

Please call with any questions or comments.

Sincerely,



Nancy Beardsley  
Project Manager, Federal Facilities Unit  
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