

ROBERT G.
GERBER, INC.*Geoscience and Environmental Management Professionals*

17 West Street • Freeport, Maine • 04032-1133

207-865-6138 • (FAX) 207-865-1071

October 14, 1994
File #965Ms. Louisa Lofchie
Brunswick Area Citizens for a Safe Environment
P. O. Box 245
Brunswick, ME 04011Subject: Review of *Draft Final Work Plan, Site 9, Neptune Drive Disposal Site*, September 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 Final Work Plan, Site 9, Neptune Drive Disposal Site*, dated September 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 presents site-specific activities for conducting additional field investigations of potential source areas at Site 9.

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 E. 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.

We reviewed July 1994 *Proposed Plan for Site 9* that presented the Navy's preferred alternative for an interim remedial action for groundwater at Site 9. We provided you with written comments on the *Proposed Plan* at the end of the public comment period in our letter dated August 10, 1994. We also reviewed the *Draft Final Long Term Monitoring Plan, Site 9*, and the *Draft Final Interim Record of Decision for an Interim Remedial Action at Site 9*, both dated August 1994, and provided our comments to you in our letters dated August 19, 1994 and September 1, 1994, respectively. We commented on an earlier version of the subject document, the *Draft Work Plan, Site 9, Neptune Drive Disposal Site* dated June 1994, in our letter to you dated July 27, 1994. While the subject document addresses a number of the questions, suggestions, and issues we

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Identified in our July 27, 1994 letter, several points remain outstanding. We would also like to point out that we have not reviewed two of the documents incorporated by reference in the subject document, ABB-ES' corporate *Health and Safety Plan (HASP)* and 1988 *Quality Assurance Program Plan (QAPP)*, so we are not able to provide any comments relating to those two documents. Our comments on the *Draft Final Work Plan* are as follows:

1. Page 1+. This comment reiterates comment #1 in our July 27, 1994 letter concerning the June 1994 version of the subject document. A good deal of information has been added to the current version of the *Work Plan* to clarify the site-specific investigation methods and the rationale for method and location selection. Our intent in making this comment is to point out the need for a statement of the "big picture" for Site 9, and where the activities described in the *Work Plan* fit in the overall investigation and remediation "scheme" or scenario for Site 9.

It is not clear how the activities described in the subject document relate to the interim remedial action for groundwater at Site 9 or the investigations at the Naval Exchange (NEX) gasoline station. The Introduction (or other appropriate section) should provide an explanation of the various environmental investigations being conducted at Site 9 and the NEX, and how the data generated will be used to develop a final Record of Decision (ROD). We also recall that roadwork would be conducted along Neptune Drive this summer. At one of the TRC meetings we attended, it was suggested that the Navy take advantage of the opportunity to observe subsurface conditions in the middle of Site 9, but there is no mention of the Neptune Drive construction activities in the *Work Plan*.

2. Page 1-3. Given that the QAPP was prepared in 1988, does the Navy intend to review and possibly revise the document?

3. Page 2-1. How much time will elapse between the completion of the field work (estimated to take two weeks) and the submission of the investigation report for TRC review and comment?

4. Page 2-3. Will TRC representatives be consulted or informed if the Navy finds it necessary to deny clearance for the sampling locations proposed in the *Work Plan*?

5. Page 3-3. If DigSafe is to be notified, as the response to comments on the previous version of the *Work Plan* indicates, the procedure, including who will mark the investigation locations and notify DigSafe, should be described in Section 3.1.3.

6. Pages 3-4 - 3-8. The addition of the historical information in Section 3.2 is very helpful. However, there is no mention of the *Interim ROD* or the activities to be conducted under the *Interim ROD*, and how the additional investigations to be conducted in accordance with the *Work Plan* fit with the *Interim ROD*.

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7. Page 3-9. Should the term "fuel soaked oil" used in the first paragraph in section 3.2.1 (and elsewhere in the document) read something like "fuel oil soaked soil"?

8. Page 3-10. What is an "equivalent" method that might be used in place of the DEP method 4.1.2 for total fuel oil in soil? Because the total fuel oil method will not detect the lighter or more volatile fuels that might be present, the soil samples should also be analyzed by the DEP's total gasoline method (4.2.3).

In addition, the procedures for collection and handling of the soil samples for headspace screening should be described more fully, and should be similar to those in Appendix Q of the Chapter 691 regulations pertaining to underground tanks. For example, soil samples should reach a temperature of 15 to 25 , rather than ambient air temperature, before a headspace reading is taken. A duplicate of the headspace sample should be collected in the appropriate container for laboratory analysis, as once a sample is used for headspace measurement, it is no longer suitable for chemical analysis.

The last sentence in the page should be revised to clarify what will happen if no sample yields a PI meter reading above background. Will the samples at a depth comparable to that where the "fuel odor" and "fuel soaked oil (soil?)" were observed be sent for laboratory analysis?

9. Page 3-12. The last sentence on the page states that "clean cuttings" will be placed above the sandpack during well installation. What are the criteria and the method for determining if cuttings are "clean"?

10. Page 3-16. The portion of comment 8 above regarding the "equivalent" to the DEP total fuel oil method and the need for consideration of the DEP's total gasoline method to address more volatile fuels also applies to the soil samples collected in test pits.

11. Page 3-19. What are the criteria for determining when in situ parameters monitored during purging are considered "stabilized"?

12. Page 3-20. How will the "desired depth" to drive the HydroPunch be determined? While the depth to the bottom of the well screens in MW-914 and MW-915 are known, how will the top of the clay be determined? What parameters will the groundwater samples collected with the HydroPunch and from monitoring wells be analyzed for?

13. Page 4-1. The second sentence in the first paragraph in section 4.1 states that all samples collected for laboratory analysis will be analyzed for fuel oil. The method number should be provided for the preferred and any "equivalent" method. In addition, analysis by a total gasoline

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method to detect more volatile fuels should also be conducted. The next-to-last sentence on the page appears to be missing a word.

14. Pages 4-2 - 4-6. What does the heading in the right column of Table 4-1 mean and why does it change from "low concentration water detection limit" to "water detection limit" partway down page 4-3? The total fuel oil method for water, as well as the total gasoline methods for both soil and water, should be added to Table 4-1.

15. Page 4-9. The third bullet on the page should be revised to include the total fuel oil method for water, as well as the total gasoline methods for both soil and water.

16. Page A.2-6 - 2-9. The text mentions four contaminants of concern: PAHs, DCE, DCA, and vinyl chloride. However, Tables A-1 and A-2 include detections of other contaminants, such as chlordan and 2-butanone. Why aren't these other contaminants of concern for worker health and safety?

17. Page A.3-3. By how much will background PI meter readings be exceeded before work zone workers back of(f)? The Action Levels should be clearly described. How and where will background radiation readings be determined?

18. Page A.5-1. Section A.5.1 should be revised to reflect that engineering controls may become necessary to continue on-site investigations (see page A.3-3).

19. Page A.6-1 & 6-2. The last sentence on page 6-1 should be revised to reflect that Thermo Environmental, not HNU, meters will be used. Do the Thermo Environmental meters use the two different UV sources at the same time? If not, what are the criteria for selecting which source to use?

20. Page A.11-3. Because the HASP has been revised significantly since it was first submitted for review in June 1994, The Health and Safety Manager may need to review and approve the final version.

21. Appendix A-1. Comment 16 above also applies to the chemical data included in Appendix A-1. For example, should information concerning 2-butanone also be included?

22. General Comment. While many of the issues or suggestions we and others raised in our comments on the June 1994 version of the *Work Plan* have been addressed by the inclusion of detailed information in the current *Work Plan*, a number of issues should be included or expanded upon. The topics that should be addressed in the *Work Plan* include: the additional tasks, such as review of historical air photos and evaluation of nearby building uses, to identify potential up-radiant sources; what will be included in the data presentation and interpretation report, and when the

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report will be available; and, the relationship of this work plan to the interim ROD and the NEX gas station investigation. The community also remains concerned that contaminants detected in the stream sediments at Site 9 be addressed in a timely and appropriate fashion.

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.
Vice President & Chief Hydrogeologist

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