



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

N60087.AR.000697
NAS BRUNSWICK
.5090.3a

ANGUS S. KING, JR.
GOVERNOR

EDWARD O. SULLIVAN
COMMISSIONER

June 11, 1998

Mr. Emil Klawitter
Code 1823 EK
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19112-2090

Re: Final Reports - Quarterly Monitoring Event 10 - November 1997
Site 9, Neptune Drive
Naval Air Station, Brunswick, Maine (April 1998)

Dear Emil;

The Department of Environmental Protection (DEP or Department) has received the report entitled Final Reports, Quarterly Monitoring Event 10, Site 9, Neptune Drive (November 1997) prepared by EA Engineering, Science, and Technology. Based on that review, the Department has the following comments and issues.

General Comments

1. A new base map is needed for the site for Figures 2, 4 and 5. The flooded drainages are misrepresented by the single line drainage symbol. Furthermore, it appears that the "new" much enlarged area of ponded surface water behind the dams was not factored into contour drawing on the potentiometric surface maps (see Specific Comments).

Specific Comments

2. Section 1.2, Measurement of Water Level Elevations, page 1.

This section should begin with a paragraph describing the nature and physical attributes of the newly created surface water impoundments on the drainages in the downgradient area. Elevations of the ponds should be given, as well as elevations of the stream beds at key locations (headwaters and confluence at a minimum). The initial start of impoundment should be given.

3. Section 1.5, Visual Inspection, page 3, para 1.

"The volume of water contained by the surface-water impoundments was noted to be increasing compared to the previous engineering inspection conducted in July 1997".

Is this a purely a visual observation? Isn't the stage of the major impoundment instrumented?

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 764-1507

4. Section 2.1, Water Level Gauging, page 5, para 2:

"Figures 4 and 5 provide the interpreted ground-water flow directions for the subject site based on the 2 September and 4 November 1997 well gauging data respectively."

The contours in Figures 4 and 5 do not reflect the newly created surface water impoundments. See comment #1 above. MEDEP intuitively believes that, at least locally, the shallow water table should be strongly influenced by the artificially raised elevations of surface water in the downgradient area. Unless evidence can be presented to show that it is not, the contours need to be revised.

5. Section 2.2, Water Quality Indicator Parameters, page 5, para 2:

"One well (MW-NASB-080) was sampled after being purged dry, and turbidity and temperature did not stabilize to within 10 percent on 3 successive readings."

As commented previously, DEP does not agree with purging wells dry prior to sampling (See comment for Sites 1 & 3, EP).

6. Section 2.5, Sediment, page 7, para 2:

"Note that significantly higher concentrations of SVOC were reported in the duplicate compared to the primary sample at SW-010."

Shouldn't SW-010 be SED-010? It would be easier to believe that a decimal is one place off than the apparent 6.7 times increase in the duplicate sample concentrations over the actual sample concentrations. Please confirm.

7. Table 5, Summary of analytical results for groundwater samples...:

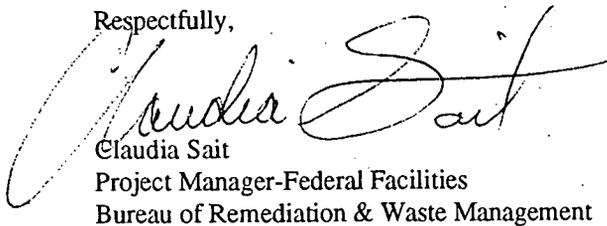
Results from Monitoring Event 10 indicate that, compared to Events 4-9, the concentration of vinyl chloride (VC) has further elevated above MCL/MEGs in wells MW-NASB-069, MW-NASB-072, and MW-NASB-081. The recent data also suggests that significant decreases in VC have occurred at MW-NASB-075 and MW-NASB-076. Therefore the relationship between the unknown source and the plume as it has evolved over time warrants a closer look. To facilitate this the Navy should be monitoring the surface water elevations above and below the dam at the time of the monitoring event. Also does the Navy have any explanation for this change?

8. Table 8, Summary of analytical results for the seep and sediment samples...:

It is noted that the lead concentration in leachate from LT-901 seep is 25 to 30 times greater than the MCL (15 µg/L) and has increased. Does the Navy have an explanation for the increase?

Please feel free to call me at (207) 287-7713 if you have any questions or comments regarding this matter.

Respectfully,



Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

cf: File

Larry Dearborn-DEP

Mike Barry-EPA

Greg Apraham NASB

Peter Nimmer- EA

Susan Weddle-BACSE

Jeff Brandow-ABB-ES

Jeff Dale-USN NORTHDIV

Carolyn Lepage