



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

N60087.AR.000855  
NAS BRUNSWICK  
5090.3a

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GOVERNOR

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COMMISSIONER

September 8, 1999

Mr. Emil Klawitter  
Code 1823 EK  
Department of the Navy, Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mail Stop 82  
Lester, PA 19113-2090

Re: Monitoring Event 14 – November 1998 Site 9: Neptune Drive Disposal Site  
Naval Air Station, Brunswick, Maine

Dear Mr. Klawitter:

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the report entitled Monitoring Event 14 – November 1998 Site 9: Neptune Drive Disposal Site, dated June 1999, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

General Comments:

1. Changes that the Navy has implemented in this monitoring event report, with input from the RAB, have greatly cut down the review time and the report is now truly a data report. Although the Navy will release interpretation of Site 9 event data only in the annual report, it is important that we compare the concentrations reported in the event reports with trends and historical data as the data becomes available. The Department has reviewed these new data in this fashion.
2. MEDEP also agrees with EPA's comments and observations for this monitoring event. No response required.

Specific comments:

3. Introduction, Section 1.1, page 1, 1<sup>st</sup> para:

"NAS Brunswick is located south of the Androscoggin River between Brunswick and Cooks Corner, Maine (Figure 1)."

This description is rather inaccurate, as Brunswick is not a distinct locality, as is Cooks Corner. A better statement would be: "*NAS Brunswick is located between the Androscoggin River and Middle Bay/Harpswell Cove approximately one mile southwest of Cooks Corner.*" Or use whatever language was decided on the draft ROD for Site 9.

4. Figure 2, Site Plan:

The map and its legend does not indicate which wells are only gauged for water level elevations versus those that are sampled for water quality. Figures 3 and 4 indicate that all wells are gauged, which is

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correct. However, Figure 2 (or a new map) should indicate which wells are sampled using a color code, and the sampled locations of LT-901 and SED-010 also should be color coded. It would even be possible to show where the different types of analyses are being run; this would benefit all parties.

5. Figures 2-4:

The following observation is not new, but has slipped through the cracks in previous reviews.

These maps show only one headwall culvert outflow into the North Branch of the Unnamed Stream. In the field, we have observed two separate subdrain discharge points into the stream that run under Neptune Drive. On the east, a concrete headwall and spillway exist; to the west a partially plugged smaller culvert contributes water into the head of the wetland at the base of the road embankment. The west seepage joins the east headwall culvert flow at the west side of the concrete spillway. Both features should be shown, and LT-901 appropriately located at one or the other seepage channel. Please make the appropriate changes.

6. Summary of Inorganic Analytical Results for Ground-water Samples, Table 6:

Why was lead not analyzed in these three groundwater samples? MEDEP requests that lead be added.

7. Summary of Analytical Results for Surface Water Sample, Table 8:

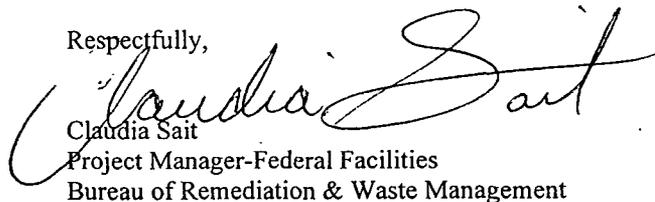
Shouldn't "Total 1,2-Dichloroethane" actually be Total 1,2-Dichloroethene?

8. Summary of Analytical Results for Sediment Sample, Table 10:

The Department notes that both vinyl chloride and trichloroethene were found at low levels in the sediment at SED-10. This is the first time since 1995 (two events) that vinyl chloride has been detected at SED-10 location. Trichloroethene has been detected sporadically during the monitoring period. No response required.

Thank you for the opportunity to review this . If you have any questions or comments please call me at (207) 287-7713.

Respectfully,



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