



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NAS BRUNSWICK
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COMMISSIONER

January 20, 2000

Mr. James Shafer
Code 1823/JS
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

Re: Site 9 Long Term Monitoring Plan
Naval Air Station, Brunswick, Maine

Dear Mr. Klawitter

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the report entitled Long-Term Monitoring Plan, Site 9 (Neptune Drive Disposal Site), dated August 1999, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

Each of our comments is followed with a code that indicates whether a response is required (RR), no response is required (NR), editorial correction needed (ED); or meeting discussion requested (MTG). No response is required for editorial corrections unless the Navy disagrees with the correction.

1. As brought up on several occasions, the Department was surprised to receive a "final" copy of this document since not all the outstanding issues had been resolved. However, the Navy has assured us that the necessary revisions will be made to this version to address our outstanding concerns. For the most part the Navy has incorporated MEDEP's previous comments and corrections into the current plan (August 1999). (NR)
2. Page 1-7, Section 1.4.5, Analytical Methods, para 2:

"If a monitoring well is being considered for deletion from the sampling program for volatile organic compounds, ground-water samples from that well will be analyzed using Method 8260B modified for SIM for two sampling rounds, in order to achieve the detection limit of 0.15 µg/L (State MEG for vinyl chloride). This method will not be used at a well where vinyl chloride is known to be above 2 µg/L, as established using EPA method 8260B."

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The State objects to the reference to two sampling rounds using Method 8260B modified for SIM. As stated in our letter to the Navy of August 6, 1999, it is highly unlikely that the State will agree to eliminating a monitoring well based on such limited data. Also it is unclear what happens if the vinyl chloride is evident at levels

between the MCL of 2.0 ppb and the MEG of 0.15 ppb. There may be instances where the vinyl chloride in groundwater is below the MCL but above the MEG. These wells should be sampled until EPA and MEDEP are satisfied that the ground water does not contain vinyl chloride above its MEG (or is steadily approaching the MEG). Therefore delete this phrase "for two sampling rounds" from this section, section 3.3, 2nd bullet, table 5-2, and anywhere else it is found in the document. (RR)

3. Page 3-3, Section 3.3, Analytical Parameters and Procedures, bullet 5:

"Field parameters will be monitored at the time of sampling, including, pH temperatures, turbidity, specific conductance. Optional field parameters, including Eh and dissolved oxygen, will also be recorded."

DEP stands by its comment that Eh and dissolved oxygen must be included and should not be optional. The remedy for this site is natural attenuation with monitoring therefore the Navy must include all the field parameters necessary to evaluate the success of selected remedy or understand the degradation process. (RR)

4. Attachment A-1, Summary of Laboratory ..., page 1:

The Department stands by its earlier comment that any sample results not analyzed within their holding time must be flagged (e.g. footnote) on the summary tables. (Please in the future if there is any confusion regarding our comments, call for clarification.) (RR)

5. Page 1-4, Section 1.3.2, Site Hydrogeology:

- a. Monitoring well MW-NASB-69 is located in an apparent valley in the clay topography. This feature appears to exert strong influence on the distribution of vinyl chloride and 1,2-DCE. Old topographic maps of the base show a distinct drainage valley along this northwest-southeast alignment. Apparently, the old valley was filled during base construction. (NR)

- b. "Historical ground-water flow patterns indicate that the shallow ground water discharges to the two streams (now flooded)."

Please reword as follows: "*Historical ground-water flow patterns indicate that the shallow ground water passing through Site 9 discharges near the confluence of the*

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north fork tributary with the unnamed stream, which is now flooded (see Figure 1-2)." (ED)

6. Page 1-7, Section 1.4.5, Analytical Methods, 1st para:

"Sampling requirements for Target Compound List semivolatile organic compounds have been eliminated for site monitoring points."

Three monitoring wells have been retained for semivolatile analyses (see Table 1-1). Please correct the above statement. (ED)

7. It is anticipated that these comments and the Navy responses will be included in the final long term plan (revised final or the next revision). (NR)

If there are questions regarding our comments please call me at (207) 287-7713

Respectfully,



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

Cf: File

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