

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



ANGUS S. KING, JR.
February 14, 2001
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

Mr. Orlando J. Monaco
Code 1821 LM
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

Re: Site 9, Monitoring Event 17 – September 2000,
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the report entitled Monitoring Event 17-September 2000, Site 9, dated November 2000, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

General Comments:

1. MEDEP reviewed the new VOC concentration data for MW-NASB-069 with respect to this well's graph in the 1999 Annual Report for Site 9. It was observed that vinyl chloride rose to a new high of 60 µg/L, while 1,2-dichloroethene maintained its recent high levels, registering 51 µg/L. For the second sequential monitoring event, vinyl chloride concentration exceeds the corresponding 1,2-dichloroethene concentration. As proposed during our last conference call a discussion at the March technical meeting is warranted. (MTG)
2. The RAB has acknowledged that long-term monitoring programs are "living documents" that will be changed periodically. With this in mind, MEDEP requests that the following topic be added to agenda of the Technical Meeting scheduled for March 7, 2001.

In looking at the spatial relationship of VOCs relative to the elevation of well screens, MEDEP believes that NASB-21 should be included in the Long Term Monitoring program. NASB-21 is a deep companion well to NASB-80, having a screened elevation between 8.5 and 13.5 feet msl. This well is screened 1 foot lower elevation than NASB-69, where the highest detection of vinyl chloride consistently occurs. NASB-21 is about 150 upgradient of NASB-69. NASB-80 had 9 µg/L of vinyl chloride in the September 2000 monitoring event, even though its screen is 25 feet higher elevation than the adjacent NASB-21. Furthermore, during the 1996 source investigation, the newly installed NASB-21 had a very low detection of vinyl chloride.

The State would like to see this well sampled beginning in the April 2001 event. (MTG)

3. The field parameter values and inorganic chemistry results for Monitoring Event 17 seem to show a progression of downgradient effects of air sparging in the NEX area. The Department will comment in more detail upon review of the 2000 Annual Report. (NR)

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Specific comments:

4. Quality Assurance/Quality Control, Section 1.7, p. 4:

The remedy for Site 9 must be stated as "*natural attenuation with monitoring*", as it is significantly different than "monitored natural attenuation", per USEPA definitions. Please correct on p. 5 (last sentence) also. (ED)

5. Analytical Data Quality Review, Section 1.8, page 5, top bullet:

a.) Why would a detection of potassium in groundwater not be expected? Maine groundwater commonly has a potassium content of 1 to 5 mg/L, and prior monitoring event detections in this range have not been questioned. Unless extenuating circumstances are involved and are discussed in this report, this bullet should be deleted. (ED)

b.) The same standards should also be applied to sodium. (ED)

c.) Appendix C.6.3 (page C-8) should be reviewed for appropriateness, concerning potassium and sodium in source water. (RR)

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

Respectfully,



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