



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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ANGUS S. KING, JR.  
GOVERNOR

MARTHA KIRKPATRICK  
COMMISSIONER

August 10, 2001

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 Revised Long Term Monitoring Plan  
Naval Air Station, Brunswick, Maine

Dear Mr. Orlando:

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 July 2001, 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.

**General Comments:**

1. In the review of this document the Department was dismayed to see changes in the text (not included on the revision page) back to language that had been strongly rejected in earlier versions by the State. While this may be an error on the part of the Navy, never the less, it erodes the integrity of the process. The Navy is ultimately responsible for the work produced by their contractor and mistakes of this nature are unacceptable and should not be overlooked or condoned by the Navy. See comments 5 & 7 below. (RR)

**Specific Comments:**

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).

The State has repeatedly objected to the reference to two sampling rounds to eliminate a monitoring well for VOC analysis (specifically vinyl chloride) as stated in comment letters dated August 6, 1999 and January 20, 2000. The Navy finalized the Long Term Monitoring Plan (August 1999) without ever resolving this issue with the State. Two rounds do not

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
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represent a significant time period and is dependent on other variables. This paragraph should reflect only the use of Method 8260 modified for SIM for lowering the detection limit for vinyl chloride to meet the State MEGs and should not go into the elimination of monitoring wells which is covered in section 3.3.1. Please rewrite this section. (ED)

3. Page 1-7, Section 1.5, Reports and Data Presentation, para 2;

"An annual report will also provide the response letters to comments received on the previous year's annual report and monitoring event reports contained in the annual report."

Based on the past year's experience waiting for the annual report to receive responses to comments on the monitoring events and the previous annual report is too long. The annual report for 2000 has yet to be sent out in draft. If there are changes that must be made it could be two year before they would be initiated. This is unacceptable therefore response to comments should be within a more reasonable time frame such as 2 months. (MTG)

4. Table 1-1:

SVOC are analyzed for in three monitoring wells, MW NASB-69, MW NASB-70, and MW NASB-79. This needs to be clearly shown on table 1-1 either as a separate column or as a footnote. Also the nine monitoring wells at the Navy Exchange Service Station being gauged as part of this program should be listed in table 1-1.(ED)

5. Page 3-2, Section 3.1.5, Sampling Frequency:

"As detection levels continue to decrease, the monitoring frequency will decrease or be eliminated."

The detection levels are not universally decreasing and this language has been rejected by the State before. The language needs to be the same as negotiated for the August 1999 LTMP as follows: "Depending on the long-term trends of the compound concentrations, monitoring frequency may be changed with approval by EPA and MEDEP." (ED)

6. Page 3-3, Section 3.3; Analytical Parameters and Procedures:

a.) The EPA method (8270) for Semi Volatile Organics must be added to this section. (ED)

b.) Bullet 5. "Optional field parameters, including Eh and dissolved oxygen, will also be recorded."

MEDEP continues to object to considering these parameters as 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. (ED)

7. Page 3-4, Section 3.3.1, Program Modifications:

"A modification or reduction in the number of sample parameters will occur if a parameter is not detected in ground water at monitoring locations for a significant period of time after two successive monitoring events [*sic*]."

The language should be revised to its original format in the August 1999 LTMP as follows: "A modification or reduction in the number of sample parameters will occur if a parameter is not detected in ground water at monitoring locations for a significant period of time."

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MEDEP regrets the tone of this letter however it considers the undocumented changes to the LTMP to be a serious violation of trust. If you have any questions or comments please call me at (207) 287-7713.

Respectfully,

A handwritten signature in cursive script, appearing to read "Claudia Sait". The signature is written in black ink and is positioned to the right of the typed name.

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

Cf: File  
Larry Dearborn-DEP  
Anthony Williams-BNAS  
Michael Barry-EPA  
Carolyn LePage-LePage Environmental  
Al Easterday-EA  
Ed Benedikt