



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

October 12, 2001

Mr. Orlando Monaco
Department of Navy
Engineering Field Activity-Northeast
Code 1823/OM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Site 9-Aqueous Diffusion Sampling Pilot Study
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the report entitled Summary of the April 2001 Aqueous Diffusion Sampling Pilot Study for Site 9 Neptune Drive Disposal Area, dated August 29, 2001, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

General Comments:

1. The results are quite interesting although they do not provide a clear relationship between diffusion sampling and the historically used low-flow sampling. Therefore the Navy and the agencies will be needed to decide which method more accurately characterizes contaminant distribution in groundwater and if conversion to aqueous diffusion sampling is appropriate for this site.
2. The Department requests that MW-NASB-227 in which contaminants were detected at all three diffusion sampling depths be included in the upcoming sampling round, exactly as done in the April sampling round with 3 sampling intervals. The shallow diffusion total VOC concentration was over double the low-flow concentration, and most surprisingly, TCE was not detected in the low-flow sample. Although vinyl chloride was not detected, the presence of 4 $\mu\text{g/L}$ of TCE is of interest in that documenting the long-term trend for a likely parent of VC could prove valuable. As such, the highest concentration interval must be well established by repetitive testing in the pilot study.
3. MEDEP concurs with all other Table 1 proposed aqueous diffusion sampling depths for Event 19.
4. The detection of 2 $\mu\text{g/L}$ of benzene in the rinsate blank is unusual. If this happens again, the Navy should investigate to learn whether it is a sample handling problem or a laboratory analytical problem.

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Thank you for the opportunity to review this report. 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 word "Respectfully,".

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

Cf: File
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