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cc:
Subject Site 9 - ME 18

Hi, everyone.

Here are the State's comments on the Site 9 Monitoring Event 18 report. Hopefully our comments on ME 18 for Sites 1,3 & EP will follow shortly. Thanks, CBS

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STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

February 5, 2002

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, Monitoring Event 18 (April/May 2001)
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP) has reviewed the report entitled Monitoring Event 18, April/May 2001, Site 9, dated December 2001, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

General Comments:

1. MEDEP's review of this document, in context with past Site 9 reports, again raises our concern that the monitoring network may be inadequate. To ensure that the full picture of contamination and natural attenuation is being tracked through long-term monitoring and that the remedy remains protective, additional monitoring wells and another surface water/sediment station may be necessary. MEDEP proposes to discuss its concerns at a future technical meeting. (MTG)
2. The data from MW-NASB-80 except for gauging appears to be missing. Please provide an explanation for the omission or provide supplemental data for this monitoring event. (RR)
3. The TCE level at MW-NASB-227 (4 ppb) is approaching its Maximum Exposure Guideline threshold of 5 ppb therefore the institutional control boundary may not be protective. This is another concern that should be discussed at a future technical meeting. (MTG)

Specific Comments:

4. Section 1.3.1, Sampling Activities, p. 2, bottom paragraph:

MEDEP notes that MW-NASB-071 was purged for sampling at 1.5 liters per minute, which is not considered a low-flow sampling rate. The well did not incur much drawdown during the purging, and because the diffusion sampling method gave non-detects for all compounds tested, the non-detect results reported from the pumped sample appear to be valid. When true low-rates are not achieved, the data needs to be qualified in tables and the pumping rate given. In the case of MW-NASB-071, Tables 4 and A-1 should have a footnote added.
(ED)

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5. Section 1.6, Visual Inspection, p. 4:

"A minor sheen was present at the entrance of the retention pond. A propylene odor was noted in the area of the retention ponds by the inspector."

Please identify if the pond with the sheen is the Upper Impoundment Pond. The report should provide a statement of the amount of rainfall received the week before sampling at Site 9, as does the Eastern Plume report. (MEDEP assumes that the Base Environmental Office was notified.) (ED)

6. Section 1.8, Analytical Data Quality Review, p. 5:

Please explain what the Navy means by the phrase "...should be considered estimated with a low bias based on precision criteria". Does this imply that the laboratory-reported values for vinyl chloride are lower than values that might have been obtained with no precision standards problem? Appendix C-3 (Precision) does not provide clarity either. Since vinyl chloride is the primary contaminant of concern at Site 9, this quality control problem must not be allowed to impact graphed contamination trends and should be plainly footnoted if the impact is discernable. (RR/ED)

7. Section 1.8, Analytical Data Quality Review, p.6, last bullet:

"The results for total 1,2-dichloroethene should be considered an estimation of its true concentration in Sample MW-NASB-069 (shallow) based on field precision criteria."

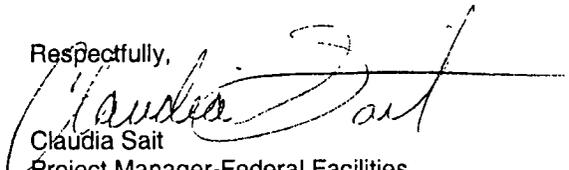
Why is this statement necessary? Please clarify what makes this particular sample unlike any of the others. (RR)

8. Table 5, Summary of Water Quality Indicator Parameters Measured in Surface water and Leachate Seep Samples:

Surface water and leachate seep temperatures are reported as 18.7 and 17.72 °C, respectively. These values are high for this time of year (May 2), unless the sampled locations were strongly affected by direct sunshine. Please explain the circumstances at the time of sample collection. (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,


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

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