STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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December 8, 1993

Mr. Fred Evans
Project Manager, Code 1821
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, Penn. 19112-2090

RE: Technical Memorandum Site 11 Fire Training Area, Naval Air Station Brunswick

Dear Fred:

The Department has received and reviewed the Technical Memorandum for Site 11 Fire Training Area, dated November 1993. The Department has also reviewed the Statement of Work that was faxed to me on November 9, 1993. The Department's comments are provided below.

Statement of Work

C.3: RCRA empty drums/buckets as well as metallic debris removed from Site 11 should be treated as hazardous waste, until such time as the Navy can prove through sampling and analysis that the waste is non-hazardous. As was discussed at the TRC, it may be less costly for the Navy to assume the waste is hazardous and properly dispose of the metal debris as hazardous waste.

A GPR instrument should be used at the site during excavation. The instrument could be used during excavation, as soon as drums are removed, and could possible eliminate the need for further actions.

Technical Memorandum
General Comments

Following the removal of all metal drums and debris, the Department must review and comment upon the confirmatory magnetic survey results and proposed plan before a second round of excavation and removal is initiated. Any anomaly equal to or greater that 15 gammas/meter should be investigated with an exploratory test pit.

Removal of the UST and associated piping should take place soon. Soil should be remediated and/or removed as soon as possible.

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The laboratory results from soil samples collected at the bottom of each pit may warrant further excavation and removal. The Department would like to be consulted before the Navy makes a decision to take further action.

Specific Comments

Page 2-1, 2-3: The last sentence on page 2-1 states that a piping system was installed to contain the unburned liquids. Please include construction details of the piping system and UST. An explanation should be included in the text outlining why the piping system was not located during the magnetometer survey.

Page 3-1, first sentence: This sentence states that a Preliminary Assessment (PA) was conducted prior to the 1993 field work. Page 4-2 states that the PA was performed after the initial geophysical survey was conducted. Please clarify the text.

Section 4.0: Present site conditions do not represent optimal conditions for use of the selected geophysical equipment. The site includes surface materials that limit the ability to detect varied ferrous objects in the vicinity of surface interferences. The text should explain how objects closer to the surface may mask objects buried deeper in the subsurface. The text should also address how areas in the vicinity of surface interferences will be evaluated for the presence of drums below the land surface.

Page 5-1: How do you know that the metallic debris uncovered is non-hazardous?

Page 6-1, second paragraph, page 6-2:

> The text states that total SVOC concentrations for TP-93-01 are 719 ug/l. Appendix D analytical results show a total SVOC concentration of 689,000 ug/L. Please clarify.
>
> The test states that BEHP was detected in sample TP-93-03 at 110 ug/L. Appendix D lists the BEHP concentration as 1000 ug/L.
>
> The test states that the method blank associated with sample TP-93-03 detected BEHP. Appendix D does not include the results for the method blank. The complete laboratory report must be included in Appendix D.
>
> The text states that MEK was detected in TP-93-11 at 0.1%. Appendix D results show that MEK was detected at 0.15%. Please clarify.

Appendix D: Many of the samples required dilution for analysis which raised the detection limits for almost all compounds to unacceptable levels. When samples require dilution, additional extractions from the original sample must be analyzed, this will lower the detection limits of the remaining sample components. In the future, the

Department will require additional sampling if detection limits are not at acceptable levels.

Please call me at 207-287-2651, f you have any questions or comments.

Sincerely,

Nancy Beardsley

Nancy Beardsley
Project Manager, Federal Facilities Unit
Office of the Commissioner

cc: Bob Lim, USEPA
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