



STATE OF MAINE

Department of Environmental Protection

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December 19, 1991

Mr. James Shafer
Department of the Navy, Northern Division
Naval Facilities Engineering Command
Building 77-L, CODE 1421
Philadelphia Naval Shipyard
Philadelphia, PA 19112-5094

RE: Draft Site Evaluation Work Plan, Building 95, November,
1991, by ABB Environmental Services, Inc.

Dear Mr. Shafer:

The Maine Department of Environmental Protection (MEDEP) has completed its review of the Draft Site Evaluation Work Plan for Building 95, which was submitted to the MEDEP on November 18, 1991 on behalf of the U.S. Department of the Navy for the Naval Air Station Brunswick (NASB) Site.

The MEDEP wishes to submit the following partial comments for your consideration.

General Comments:

This work plan was developed to be consistent with the Maine Board of Environmental Protection (BEP) RCRA closure order of May 22, 1991. The funding of this investigation and remedial action under the Navy's Installation Restoration Program may also require that the work plan be consistent with requirements set forth in Section 11 of the Federal Facilities Agreement, dated October 19, 1991

EPA guidance states that To Be Considered (TBC) values such as health advisories, reference doses, or other guidelines will be used when ARARs are not sufficiently protective or available. Proper consideration must be given to State TBCs at each step of the site investigation and remedial process. For potential or documented ground water contamination the Maximum Contaminant Levels (MCL) will be utilized however, for any target compound list analyte for which an MCL does

not exist, the Maine Exposure Guideline (MEG) value should be substituted.

Any future remedial actions must be adequate to reduce contaminant impact on groundwater resources to levels that can be considered sufficiently protective by the MEDEP.

Specific Comments:

Page	Section	Comment
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4-8,	table 4-2, Laboratory Analytical Program-Soils:	Four wipe samples, 1 field duplicate, and 1 matrix spike will total 6 wipe samples to be submitted, not 7 samples as indicated in this table.
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4-13,	table 4-3, Surface Soil Sampling Results-Building 95:	Endrin Aldehyde was included in the target compound list but appears to be missing from table 4-3. Identify whether this contaminant was included in previous analysis and list the concentration if available.
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4-14,	section 4.4.1, Insecticide/Herbicide Storage Building:	In the exploration program summary, identify the total number and types of samples to be collected for field screening and the number of samples to be sent for laboratory analysis. This will summarize information provided in other parts of the work plan such as page 4-3 (section 4.3.2) and table 4-2.
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4-15,	section 4.4.1:	The soil/water grid pattern identified in this section and in figure 4-4 does not include any sampling point in the "dumping area" located behind Building 95. This dumping area was discussed on page 4-11 and shown on the site sketch in figure 4-2. The location of prior surface soil sampling (figure 4-3) indicates that no previous sampling was conducted in the dumping area. An effort must be made to collect soil samples from this area to determine if this is a problem area overlooked in previous sampling.
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4-17,	section 4.4.1:	The anticipated depths of soil sampling were selected at 0.5', 2.5', 3.5', 5', and 10'. The introduction to the Terra Probe survey (page 4-3) stated that up to five soil samples would be collected at each location. Identify circumstances that might result in less than five samples being collected.
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It is not clear whether the confirmatory laboratory samples (5% of samples) will be randomly selected from all soil samples obtained during the field screening process or only from samples with detected contamination. Clarify the method by which random selections will be made.

4-18, section 4.4.1: In addition to the four wipe samples planned for horizontal surfaces within Building 95, preparations should be made to obtain additional samples from any obviously stained or contaminated areas within the building.

5-3, table 5-2, Contract Required Quantitation Limits (CRQL): The CRQL (water) for target compound analytes exceed the MCL or MEG (if no MCL exists) for several compounds. Consequently, the validity of non-detect results for some analytes may be questioned if these detection limits are utilized.

5-10, table 5-3, Practical Quantitation Limits (PQL) for Pesticides and Herbicides: The PQL (water) for these compounds should not exceed the MCL or MEG (if no MCL exists) that have been established for these compounds. If the PQL exceeds Federal or State guidelines, the validity of non-detect results for some analytes may be questioned.

5-15, section 5.2, Data Quality Objectives: It is not clear if random selections made from all samples or random selections from only contaminated soil, groundwater, and sludge samples will be submitted to provide for Level IV data quality.

If you have any concerns or questions regarding these comments, please contact me at (207) 289-2651.

Sincerely,



Ted Wolfe
Division of Site Investigation and Remediation
Bureau of Hazardous Materials and Solid Waste Control

cc: Michael Barden, MEDEP
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