

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



ANGUS S. KING, JR.
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MARTHA KIRKPATRICK
COMMISSIONER

June 25, 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: Building 95
Naval Air Station-Brunswick

Dear Mr. Monaco:

The purpose of this letter is to follow-up on the conference call between the Navy-Northern Division and the Maine Department of Environmental Protection on June 13, 2001. The Maine Department of Environmental Protection stands by its original position that the Navy must analyze for the second round analytes, Rotenone, Maleic Hydrazide, and Avitrol for the following reasons.

- Building 95 was used for the storage and dispensing of pesticides from the 1940's to 1985. (Engineering Evaluation/Cost Analysis-November 1992)
- These compound among others were identified by the Navy as having been stored or dispensed at Building 95. (Engineering Evaluation/Cost Analysis-November 1992)
- Limited or no information has been provided regarding the volume of pesticides, concentrations, form, handling procedures, spills, storage, disposal or dispensing. Although this is typical of this era prior to environmental requirements, MEDEP must assume the worst case scenario.
- Analysis of groundwater collected during Monitoring Events 11 (April 2000) and 12 (September 2000) detected Alpha-Chlordane and Heptachlor epoxide. (Heptachlor epoxide exceeded its Maximum Exposure Guideline for the September event.)
- The solubility and partition coefficient of alpha chlordane which has a high affinity for soil and a low affinity for water mandates that groundwater must be analyzed for all three of the agreed upon second round analytes which are more soluble with weaker soil partitioning.
- Another "short lived" pesticide (pyrethrins) was found in high concentrations in soil at this site negating half life as a reason to eliminate these compounds. Unless the volume, form and original concentration of the pesticide released are provided, MEDEP must assume the worst case scenario.
- Results of soil analyses from the site identify DDT, DDD,DDE, pyrethrins, dieldren, chlordane, inorganics in excess of background, and polynuclear aromatic hydrocarbons that "may be representative of pesticide carrier co-disposed on site. (EE/CA-Nov 92). The use of a petroleum carrier could increase solubility of some pesticides.
- Data in the EE/CA show that pesticides, at elevated levels, were found in on site soils. The presence of these pesticides is evidence of on-site releases, which may have occurred as unreported spills, disposal, mishandling or use.

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Therefore based on the known data the MEDEP requires the following:

- that the Long Term Monitoring be continued;
- that MW-NASB-067 be added to the monitoring network;
- that Rotenone, Maleic Hydrazide, and Avitrol be added to the list of analytical parameters.

It is MEDEP's understanding that the Navy may have sampled for Avitrol in soil. If this is the case, the analytical results and supporting information should be submitted to MEDEP for review. If the sampling and analysis are determined by MEDEP to be satisfactory our position on Avitrol may be reassessed.

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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