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Subject: STATE OF MAINE

<<BNAS209Bldg95memo.doc>>

Per our discussion on Building 95 and maleic hydrazide analysis, this memo lays out the groundwater elevation that MEDEP would accept as "high groundwater" in order to resolve this issue. Please call me if we need to discuss this matter further.



BNAS209Bldg95memo.doc

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF REMEDIATION AND WASTE MANAGEMENT, TECHNICAL SERVICES

MEMORANDUM

TO: Al Easterday-EA Engineering

FROM: Claudia Sait-MEDEP Project Manager

DATE: March 3, 2003

SUBJECT: **Response to Navy's Response to MEDEP Review of Monitoring Event 15 (November 21, 2002), Building 95, Naval Air Station, Brunswick, Maine**

MEDEP Comment 4:

By prior agreement, the second-round analytes were to be sampled for a minimum of two rounds that included both a high and a low water table condition at the site, the chemical data would be reviewed, and a decision would be made as to whether the second-round analytes could be dropped from further sampling rounds. This comment recommended that the Navy include maleic hydrazide in the fall monitoring event of 2002 (Event 16) "as groundwater levels are expected to be higher than those of the last two events".

Upon recent review of the data collected to date, MEDEP pointed out that Monitoring Events 14-16, which included maleic hydrazide, did not include a high water table condition. Water-level data collected by the Navy show that Event 15 was sampled too late in the spring (April 23, 2002), and the water table was over 1.5 feet lower than levels historically recorded in the spring. Using hydrographs furnished by the Navy, MEDEP noted that the water table at MW-NASB-066, which correlates very closely to that of MW-NASB-97 and other site wells, has been at or above an elevation of 72.4 feet five different times since measurements began in March 1995. The last documented date of this elevation was April 2, 2002, however, water samples were not collected until April 23, 2002.

MW-NASB-097, the monitoring well of concern, has a starting date of March 2000. The average difference in water table elevation between these two wells for seven concurrent measurements is approximately 0.9 feet. The elevations of MW-NASB-097 are lower because it is located downgradient. Relative to MW-NASB-066, an equivalent water-table elevation in MW-NASB-097, the only well that MEDEP requests another analysis for maleic hydrazide, is 72.4 minus 0.9, or 71.5 feet.

The Navy needs to make its best effort to collect groundwater samples at Building 95 during the late winter/early spring 2003 monitoring event when the water table is at or above 71.5 feet msl in MW-NASB-097. Because nature's timing of snowmelt and rain during March and April is unpredictable, frequent checking of the water level in MW-NASB-097 should be performed to indicate when samples should be collected. If maleic hydrazide is not detected in the "high water" sample, the Department can agree that this analyte can be dropped from future sampling.

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Other than confirming that the groundwater elevation in MW-NASB-97 is at 71.5 feet msl the Long Term Monitoring program for Building 95 should be conducted per the Long Term Monitoring Plan, as revised.