



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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December 10, 2003

Mr. Orlando Monaco
Department of Navy
Engineering Field Activity-Northeast
Code 1823/OM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Building 95, Monitoring Event 16-September 2002
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP) has reviewed the draft report entitled Monitoring Event 16-September 2002 for Building 95, dated October 2003, prepared by EA Engineering, Science and Technology. Based on that review MEDEP has the following comments and issues.

General Comments:

1. Since monitoring events are being used in place of an annual report the understanding of the monitoring event reports relative to the initial site problem should be enhanced by inserting a paragraph or two into the Introduction that briefly relates what activities occurred at the site that caused contamination, and what corrective actions were taken (e.g. soil removal and monitoring well installation). (ED)
2. It is noted that water levels were measured in "all wells at the Old Navy Fuel Farm ... to better identify groundwater flow". Data for 12 wells are given in Table 2, but Figure 3 (Interpreted Groundwater Potentiometric Surface Contour Map) only shows two of these wells. The other wells lie outside the figure boundaries. If any other well besides the two shown were used to interpret groundwater flow direction, the text should explain how this was done. If data from the other ten wells were not used to draw the contours, then the text needs to be revised and the information eliminated from Table 2. MEDEP believes that the best contouring will result by making use of most, or all, of the Old Fuel Farm monitoring wells. In this case, a figure should be presented in this report that shows the larger picture. (RR & ED)

Specific Comments:

3. Section 1.2, Project Background, p. 1 & 2:
 - a.) Paragraphs 2-4 attempt to provide an overview of a complicated site history and changing monitoring program. MEDEP recommends the following in an attempt to provide a more fluent overview.

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- Delete the first sentence of para 3. (This information is in the record and doesn't provide any relevant information to a reader.)
- A brief description of the development of the first and second round analytes and the circumstances that triggered the initiation of the second round analytes would be helpful.
- An overview of the reduction of both the frequency and the analyte list might be better accomplished with bulleted items. (ED)

b.) Paragraph 4 in particular is difficult to understand in that it discusses a recommendation beginning in September 2003 but then switches at the end to the reason maleic hydrazide was analyzed for in Monitoring Event 16 (April 2002). Please re-read this paragraph and check the chronology before revising. (ED)

4. Section 1.5, Visual Inspection, p. 4:

"Inspection of the area confirmed no exposure of the geotextile marker fabric at the ground surface."

Within the written context of this report, the Navy should supply a brief explanation of the use of the geotextile so that a reader that is not familiar with the Building 95 site will understand this statement.

5. Section 1.7, Analytical Data Quality Review, p. 4, 2nd paragraph:

"All sample results in Sample MW-NASB-097 are considered estimated due to low system monitoring compound recoveries." "However, the analytical data are considered to be of sufficient quality to evaluate the long-term effectiveness of the removal action."

This paragraph should reference D.4 Accuracy, D.4.1 Pesticide Compounds beginning on page 5 of Appendix D. Some estimated quantification of the error bar should be given in support of the second quoted sentence above. (ED)

6. Section 2.2.2 Groundwater Sampling Results, p.6, 1st paragraph:

"Sample results have been below corresponding MEGs/MCLs since March 2000, with the exception of one exceedance of alpha-chlordane noted during October 2001 and the exceedances of both alpha-chlordane and heptachlor epoxide during September 2002."

This statement is not accurate. Figure 14 in Appendix C shows that all but one of the six sample results for heptachlor epoxide exceeds the MEG of 0.04 $\mu\text{g/L}$. Furthermore, September 2002 had the highest concentration. Please correct this paragraph. (ED)

7. Section 2.2.2 Groundwater Sampling Results, p.6, 2nd paragraph:

"No pesticides have been detected at this monitoring well location since March 2000."

For clarity, please modify to read: "No pesticides have been detected at this monitoring well location since *the well was installed and first sampled in* March 2000."

8. Section 3, Recommendations, p. 7 bullet 2:

Please re-read bullet 2. MEDEP recommends the following language: "~~Reduce the number of parameters for laboratory analysis to~~ Eliminate maleic hydrazide from the sampling program...."

9. Section 3, Recommendations, p. 7 bullet 3:

Please delete bullet 3. It is very similar to the information provided in bullet 2 and the agreement to eliminate maleic hydrazide from Bldg 95 analyte list was not made until September 16, 2003, therefore it is inappropriate to include it in this report.

10. Section 3, Recommendations, p. 7, last bullet:

“Generate a consensus statement to document changes to the site to date.”

MEDEP believes that the Navy is proposing that a consensus statement would document the history of site, long-term monitoring decisions, regulatory decisions based on new data collected, and related activities, such as new well installations. Please clarify by adding information to this bullet.

11. Figure 2, Site Plan:

a.) This figure shows the area and depths of soil excavation, and where soil was buried. The figure legend and report text provides no further details, thus, it is assumed that the reader has read earlier background reports. The legend should make it clear what soil (origin) was buried where indicated on the figure, and provide reference to the appropriate remedial action report. (ED)

b.) Also, the depth-of-excavation contours are very faint on the MEDEP copies, and are difficult to read. Please strengthen these line weights. (ED)

12. Appendix E.2, Field Record of Well Gauging, Purging, and Sampling Forms:

a.) These field forms are incompletely filled out and/or displayed in places. For example, on one sheet there is no entry under “Sample Personnel” (MW-NASB-067 for September 10), and on the field forms for November 11, 2002 for late collection of maleic hydrazide (which is not explained in the text) the report pages are missing the “Sample Personnel” line. The missing information is potentially significant in the case of MW-NAB-067, as the following appears under comments: “strong chemical odor in purge water”. The September 10, 2002 sampling field record sheet for MW-NASB-067 makes no mention of odors at this well. Were different people doing the sampling? This difference is even more intriguing because the earlier data weather note says “sunny hot humid” while the later data weather note says “cloudy, windy, warm, humid”. The odor detected in November could have also been present in September, and in September, conditions were more conducive to detection. Recall that MW-NASB-067 is located next to the area of deepest soil excavation, close to the source area hot spot. A number of SVOCs were documented at this location in the 1990s. Please correct the reporting deficiencies, and comment on the odor observation. (RR & ED)

b.) Also, please explain what the September 18 comments refer to in the lower right corner of the field sheets for MW-NASB-067, MW-NASB-097 and MW-NASB-098. (RR)

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Thank you for the opportunity to review this report. If you have any questions or comments please call me at (207) 287-7713.

Respectfully,

A handwritten signature in cursive script that reads "Claudia Salt". The signature is written in black ink and is positioned to the right of the word "Respectfully,".

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

Cf: File
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