



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NAS BRUNSWICK
5090.3a

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

October 3, 2006

Mr. Orlando Monaco
Department of Navy
Base Realignment and Closure
Program Management Office-Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Building 95-Method Detection Limits and Reporting Limits
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

MEDEP has reviewed Environmental Chemical Corporation's response to comments (no date) sent via email on July 25, 2006 regarding MEDEP's letter dated July 5, 2006 on Method Detection Limits (MDL) and Method Reporting Limits (MRL) of groundwater analysis at Building 95. Based on our review MEDEP has the following outstanding comments.

In the future MEDEP requests that the Navy have its consultants date all correspondence and state that it is sent on the behalf of the Navy.

RTC #1: The response is acceptable if the Navy verifies that Northeast Laboratories is reporting any detects greater than the MDL and less than the MRL with a "J" qualifier. Typically only detects greater than 1/2 MRL would be reported, so if this is not being done it will have to be arranged with the lab. (Also see follow up comment to RTC 6.)

Also, there should be a brief text description of the reporting changes in Monitoring Event 21 and 22 reports. It must note that although non-detects are reported to the MRL, any detect above the MDL would appear.

RTC#2: The response is acceptable.

RTC #3: The response is acceptable.

RTC #4: The response is acceptable.

RTC #5: The response is acceptable.

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RTC #6: In the last two monitoring event reports, the data was reported Non-Detect at the MRL NOT the MDL. This also contradicts RTC #1 that states Non Detects at the MDL are reported ND at the MRL. For clarity the reporting of MDL/MRL values should be explained in the text, or as a note in the data tables so the reviewer understands what value is used for ND's. The data tables should include the MDL and the MRL for reference.

Northeast Laboratories can achieve MDLs below the MEG for all compounds but toxaphene, so if they agree to report to that level, only toxaphene will be above its MEG.

RTC #7 is acceptable.

Please contact me at (207) 287-7713 or claudia.b.sait@maine.gov, if you have any questions or comments.

Respectfully,

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

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

Cf: File
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