

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



JOHN ELIAS BALDACCI
GOVERNOR

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COMMISSIONER

May 13, 2007

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

Re: Site 17 (Building 95) Monitoring Event 23 Report
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

Pursuant to Section VI of the Naval Air Station, Brunswick, Maine Federal Facility Agreement (Oct 1990), as amended, the Maine Department of Environmental Protection (MEDEP) has reviewed the draft Building 95, Monitoring Event 23 Report, June 2006, dated April 2007, prepared by Environmental Chemical Corporation. Based on that review MEDEP has the following comments and issues:

General Comments:

1. The overall organization and presentation of the data, trend charts and other appendices was logical and consistent with suggested corrections from past reviews. The addition of text in Section 1.3 describing the process for evaluating data to the MDL, and reporting non-detects to the MRL is an excellent and needed addition to the report. A summary of the data validation review was also included as an appendix, and is a useful addition. MEDEP supports inclusion of a summary of this nature in all ME reports so reviewers do not have to review the entire data validation package.
2. Based on a review of the tables and appendices the data evaluation was appropriate. The only detection this round was a low (0.21 ug/l) detection of 4,4 DDT.
3. There are two Appendix D listed in the Appendices on the CD Rom, please adjust the titles and text as needed for clarity. Appendix F should be re-titled as "Trend Graphs" or something similar. The presentation of the trends with different symbols for detects/non-detects is a helpful addition to the figures.
4. A brief notation such as "Non-detects are reported to the MRL, detects are reported to the MDL" should be added to the table and figures for clarification.
5. Please change the title of this report and future reports to Site 17 or Site 17 (Bldg 95) to differentiate between the building and the site and to conform to the Federal Facility Agreement. In future reports Site 17 should be used instead of Building 95 in the text.

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Specific Comments:

6. Section 1.2, Measurement of Water Level Elevations, and Figure 1-3: The figure should be expanded to show the location of MW-NASB-209R, and the labels for MW-NASB-067 (well designation and water level elevation) need to be added to the figure.
7. MEDEP notes that the flow direction is approximately Southeast at 146 degrees, which is typical for the last several years and that the spring monitoring round of water elevations are also near the high levels of 2005, although the sampling occurred in June rather than May.
8. Section 2.3, Appendix F and Table 1-4: "All groundwater sampling data results..."

The statement is incorrect as 4,4 DDT was detected at MW-NASB-097 this round. Please correct. MEDEP will also be interested to see if the detections noted in 2000-2004 return if water elevations drop to those levels in 2007. It is also possible that the soluble fraction of the residual pesticides at the site has largely been flushed out of the soils at the site.
9. Table 1-4: The Maximum Exposure Guideline (MEG) 2006 version for Lindane (0.2 ppb), Endosulfan (42 ppb for the sum of the I and II mixtures) should be added to the table. There is a revised MEG for Methoxychlor of 42 ppb, please update the table to reflect the 2006 risk based numbers.
10. Section 3.1, LTM Objectives:
 - Bullet 1 – Please revise the first sentence to reflect the 4,4 DDT detection at MW_NASB-097. MEDEP concurs that overall concentrations in groundwater have declined since the detections 2000 – 2001.
 - Bullet 3 – Please confirm the repairs at MW-NASB-097 have been completed.
11. Section 3.2, Recommendations, Page 3-2: At this time, MEDEP supports continuing with the long-term monitoring until the soil investigation/remediation is completed, unless the initial work determines that no further soil removal is needed. The low frequency of detections however, make discussion of optimization reasonable. The Consensus Statement seems a valid topic for a Technical Meeting when the next step of work for Site 17 is determined.

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

Respectfully,


Claudia Sait
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Bureau of Remediation & Waste Management

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