



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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July 05, 2001

Mr. Brian Helland
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

Re: Remediation of the Old Navy Fuel Farm
Naval Air Station, Brunswick, Maine

Dear Mr. Helland:

The Maine Department of Environmental Protection (MEDEP or Department) has received the Draft Final Remediation of the Old Navy Fuel Farm, dated January 5, 2001, prepared by Foster Wheeler Environmental Corporation.

General Comments:

1. MEDEP notes that the report date should be changed from January 2000 to January 2001.
2. MEDEP commends the Navy for utilizing the CD media for transmitting the 1289 pages of analytical results and 489 pages of waste disposal information. However, it is time-consuming to locate data for a particular pit, in that an index was not provided for either of the above appendices. We request that indexes be furnished for all future CD containing voluminous data.

Specific Comments

3. Section 3.3, Site Investigation, p. 3-2, 1st para:

"Foster Wheeler determined that contaminated areas identified during the direct-push investigation, performed by EA, were inconsistent with analytical results from the initial test pits excavated at the site."

The Department is aware of this discrepancy, but was looking for a technical explanation in the final report. Results from 25 initial test pits were compared with 175 prior direct-push soil samples. The 1999 direct-push investigation analyzed for BTEX concentrations, while the August 2000 test pitting investigation analyzed for total petroleum hydrocarbons – namely DRO and GRO. A rough estimate is that half of the hot-spot areas mapped in 1999 are the same as those mapped in 2000. Therefore, the differences may not be as great as being portrayed. Please add more discussion of differences observed and likely reasons for these differences.

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4. Section 3.3, Site Investigation, Table 3-2:

In the header of this table, "Result (ppm)" should be replaced by "*Total Concentration, DRO + GRO (ppm)*"

5. Section 3.5, Contaminated Soil Excavation, p. 3-7, 2nd para:

"Areas that had TPH concentrations exceeding 870 ppm were re-excavated until sample results confirmed that the area was free of contamination."

Free of contamination means non-detects. This should be changed to say "*until sample results confirmed that the remaining perimeter soils were below 870 ppm.*"

6. Section 3.6, Confirmation Sampling, p. 3-14, 2nd para:

It should be made clearer that "combined TPH concentrations" means DRO + GRO totals for each sample, and that these totals are reported in Table 3-5.

7. Section 3.9, Water Treatment, p. 3-17:

"Results of the analysis confirmed that the groundwater was free of contamination."

Again, what does the Navy mean to imply by "free"? The water analysis labeled "OFF-WI GRAB 09/29/00 at 1130" showed 780 DRO and 290 GRO. It is an established fact that groundwater underlying the OFF is not clean. Please clarify and correct.

Thank you for the opportunity to review this report. 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

Cf: File
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