

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS

GE

MARTHA KIRKPATRICK  
COMMISSIONER

July 16, 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: Environmental Site Assessment Report  
Topsham Annex, Topsham, Maine

Dear Mr. Helland:

The Maine Department of Environmental Protection (MEDEP or Department) has received and reviewed the Draft Final Environmental Site Assessment Report, dated April, 2001, prepared by Malcolm Pirnie. Based on that review the Department has the following issues and comments.

The Department reserves all rights and authorities relative to information not contained in this document whether or not such information was known when the document was issued or discovered after such issuance.

**General comments:**

1. MEDEP appreciates the Navy's and their contractor's efforts in producing a report which is very direct and easy to assimilate, without extraneous material. Also many of MEDEP outstanding concerns regarding the Topsham Annex appear to have been addressed.
2. Throughout the document text there is confusion as to the number of groundwater sampling locations and soil sampling locations. It appears that some of the confusion lies with figure 2 since the symbols are too small to determine that some areas are dual sampling points. This is clearer on the figures depicting the individual buildings. Figure 2 should be revised to clearly indicate the soil and groundwater sampling points, including the dual sampling points. Also the building number should be enlarged for easier visibility.
3. Several times, the interpretation of elevated metal concentrations are explained as "believed to be representative of site-background since no other constituents of concern were detected." Which metal besides arsenic does the Navy consider elevated? While one may expect elevated metals to be found where DRO and/or GRO leakage/spills have occurred, a site-wide correlation was not found by this ESA. However, at Building 378, the following were present: a gasoline odor on the temporary well (Appendix D Field Notes, p. 10), DRO above the Maine MEG, and "elevated" RCRA-8 metal concentrations. Please clarify why all RCRA-8 metals are said to be elevated, but yet are also said to be representative of site background.

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4. "Remediation of on-site groundwater to meet the MEG standards is not intended".

This statement is inappropriate here and elsewhere in this document. Just data should be presented without assuming the role of the MEDEP to make regulatory determinations.

**Specific Comments:**

5. Page ES-1, para 5:

"Sampling and chemical analysis of soils (14 locations) and groundwater (6 locations) at these sites was performed to assess the potential threats..."

MEDEP count is 8 and 12 points respectively. (It is clear that not all the groundwater samplings points yielded adequate water for analysis.) However the actual number of points driven should be clarified throughout the documents and figures.

6. Page ES-4, para 3:

MEDEP agrees that a focused investigation of Building 1114 be conducted to determine the remaining source of and mitigate the high concentration of DRO in the groundwater and to determine the potential for LNAPL. Additional source removal may be required.

7. Page 1-4, para 1:

"As a result, groundwater use restrictions were placed on the property as a precautionary measure when it was transferred to MSAD 75."

Groundwater use restrictions were placed MSAD 75's Site Location of Development order by MEDEP not the Navy. This should be corrected.

8. Page 2-1, Section 2.2, Soil Sampling, para 1 and 4:

Please be sure that the 14 locations cited in these paragraphs are depicted on figure 2 and clearly depicted on the individual building figures.

9. Page 2-2, Section 2.3, Groundwater Sampling, para 1:

"Groundwater sampling was performed by MPI at six locations."

The figures depict 12 locations. Please correct.

10. Page 2-7, Section 2.10.1, Soil Sampling, para 1:

"Soil sampling in the two most eastern location of former Building 374 was prevented due to heavily wooded and steep terrain (area of concern 374.1). In their place, one soil sample (DP-13) was collected as far east as possible in that area."

The sampling may not have been adequate to determine if this area is appropriately characterized because the samples were taken upgradient of the areas of concern. MEDEP would like to visit this site. See comment 11 below.

11. Page 2-7, Section 2.10.1, Soil Sampling para 3, bullet 1:

"The soil cores at the former septic systems at former Buildings 373 and 374 reached refusal at 4.5 to 5.5 feet below grade."

According to the first paragraph on this page of the ESA and comparing that to figure 6 a soil core was not taken at the location of the former septic system at building 374. Please correct.

12. Page 3-3, Section 3.32. Buildings 337 and 338:

It seems inconceivable that 625 gallons of hazardous waste could be pumped from the lift pit in building 337 and no evidence remains. See comment 16 below.

13. Page 3-2 through 3-5, Section 3.3 Analytical Results:

Each subsection indicates the number of soil samples and groundwater samples taken. It adds up to nine soil samples and six groundwater samples. This will need to be checked and corrected as necessary.

14. Section 3.3.7, Building 1114, p. 3-5, last para:

a.) Because the Executive Summary of this report recommends a focused investigation, all sentences except the first two are inappropriate to this section. Please delete these, starting with "However, the MEGs are..."

b.) Also, delete the same sentences in Section 4.8.1.

15. Page 4-2, Section 4.3, Former Building 374, Transmitter Facility, Conclusion:

"No environmental contamination appears to be present due to previous activities at this site."

Since the sample was not taken at the area of concern the best that can be said is that the results are inconclusive.

16. Section 4.2.1, Conclusions, Buildings 337 and 338, Storage Facilities, p. 4-1 & 4-2:

One of DEP's main concerns going into the Topsham Annex environmental investigation was what contamination yet existed in the vicinity of the lift pit in Building 337, where historically contaminated groundwater had been observed in the pit. This ESA attempted to collect additional data to prove that the past contamination had dissipated. However, the only drilled location downgradient of the pit met refusal on bedrock at 10 feet in depth without encountering saturation. Therefore, groundwater downgradient of the pit has not been checked for contamination. The Department is not necessarily advocating the sampling of bedrock groundwater - at least until the overburden potential has been examined more thoroughly. Our contouring the ESA-reported water table elevations suggests that shallow groundwater above bedrock could be flowing around the apparent bedrock high to the west, or even southwest, from the lift pit. The Navy should have conducted additional borings in these areas upon finding dry overburden at DP-01. The non-attainment of sampling groundwater downgradient of the lift pit should be addressed.

17. Page 4-4, section 4.7, Building 1108, Congress Circle Housing Unit 220:

MEDEP agrees with the recommendations to perform additional investigations.

18: Page 4-5, Section 4.8.2, Recommendation, 1<sup>st</sup> sentence:

"We recommend conducting a focused investigation in the area to determine the presence of potential LNAPL and/or higher dissolved concentrations of DRO downgradient of the historical source area."

It is unclear what is meant by this statement. Both the nature and extent need to be determined so that any remaining source can be remediated; if necessary.

19. Tables, Table 1, Summary of Analytical Results:

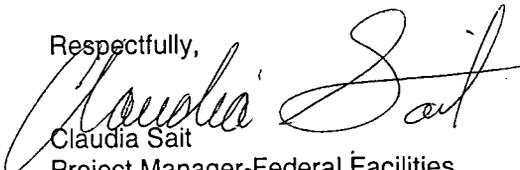
Please explain in the text how the sampling locations for PCBs and pesticide were chosen.

20. Table 2, Soil Sample Analytical Results:

The depth intervals of each soil sample analyzed should be added to headings in this table.

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

Respectfully,

  
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Bureau of Remediation & Waste Management

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