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NAS BRUNSWICK
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FINAL RESOURCE CONSERVATION AND RECOVERY ACT PARTIAL CLOSURE REPORT
FOR BUILDING 102 WITH TRANSMITTAL LETTER NAS BRUNSWICK ME
12/23/2010
NAS BRUNSWICK

**ENVIRONMENTAL DEPARTMENT
NAVAL AIR STATION
437 HUEY DRIVE
BRUNSWICK, ME 04011**

December 23, 2010

Mr. Edward Vigneault
Maine Department of Environmental Protection
Division of Oil and Hazardous Waste Facilities Registration
17 State House Station
Augusta, ME 04333-0017

Subj: Final RCRA Partial Closure Report for Building 102

Dear Mr. Vigneault:

A copy of the Final RCRA Partial Closure Report for Building 102 at Naval Air Station Brunswick is provided as Enclosure (1).

If you have any questions, please contact Mr. Mike Fagan at 921-1717 or via e-mail at michael.fagan1@navy.mil.

Sincerely,



For

LISA M. JOY
Environmental Director

Enclosure: (1) Final RCRA Partial Closure Report for Building 102

Copy to:
NAVFAC Mid-Atlantic (B. Abraham)
NAS Brunswick (M. Fagan/D. Smith)
EPA Region I (M. Daly)
MRRR (V. Boundy)
Curtis Memorial Library (L. Oliver)
Lepage Environmental (C. Lepage)
BRAC PMO NE (P. Burgio)

RCRA PARTIAL CLOSURE REPORT
for
BUILDING 102 – INDOOR SMALL ARMS RANGE PARCEL
NAVAL AIR STATION BRUNSWICK, MAINE
USEPA IDENTIFICATION NUMBER ME8170022018
DECEMBER 2010

1. INTRODUCTION

The purpose of this report is to present the findings and conclusions of the investigation conducted to determine if the Maine Department of Environmental Protection (MEDEP) RCRA or hazardous waste closure requirements have been completed for the Building 102 parcel at Naval Air Station Brunswick (NAS Brunswick).

2. PROPERTY DESCRIPTION

The Building 102 parcel is located in the north-central portion of NAS Brunswick at the intersection of Fitch Avenue and Pegasus Street (Figures 1 and 2). As shown in Figure 2, the approximately 3.6-acre parcel is bordered as follows:

- Along its northeastern and eastern boundaries, by Pegasus Street and the Building 103 (Dog Kennel) parcel, Installation Restoration Program (IRP) Site 17, and the Old Navy Fuel Farm (ONFF) Petroleum, Oil, and Lubricants (POL) Site.
- Along its southern boundary, by Fitch Avenue, the Building 583 (Recreation Mall) parcel, and the Building 585 (Chapel) parcel.
- Along its western and northwestern boundaries, by the Building 294 (Supply Warehouse) parcel, Avenue B, and the Building 223 (NMCI [Navy Marine Corps Intranet]) and Building 28 (Oxygen Shop) parcel. Beyond Seahawk Avenue, to the northwest, is the Hangar 6 parcel.

The parcel includes Building 102 (Indoor Small Arms Range), associated paved parking, and grass-covered areas. The topography of the parcel is relatively flat, the land sloping gradually to the southwest. The difference in elevation between the parcel's northeast and southwest corners is approximately 1 foot.

Building 102 itself is located in the northernmost portion of the parcel, between Avenue B and Pegasus Street (Figure 2). It was constructed in 2004 and is 4,675 square feet in area. The building is one story, with a rubber-membrane roof and precast-concrete exterior on a concrete slab foundation. Building 102 has a natural-gas-fired heating system. The layout of Building 102 is presented as Figure 3.

Photographs of Building 102 are provided as an attachment to this report.

3. PROPERTY HISTORY AND RECORDS RESEARCH

The Tetra Tech NUS, Inc. (Tetra Tech) project team interviewed NAS Brunswick Environmental Department personnel and performed records research at both NAS Brunswick and the MEDEP office in Augusta, Maine to collect available information concerning the Building 102 parcel, including past use and operations at that location.

Records reviewed include historical aerial photographs, the NAS Brunswick Other Environmental Liabilities (OEL) Database, area-specific reports, facility plans and drawings, and hazardous waste records. Aerial photographs dated 1953, 1958, 1978, 1981, 1984, 1989, 1993 and 1997 (Sewall, 1953, 1958, 1978, 1981, 1984, 1989, 1993 and 1997) were reviewed. Public Works

Department (PWD) site base maps dated 1943, 1946, 1952, 1956, 1975, 1979, 1983, 1989, and 2006 (PWD, 1943, 1946, 1952, 1956, 1975, 1979, 1983, 1989, and 2006) and site building lists for 1950, 1965, 1966, 1976, and 2006 (PWD, 1950, 1965, 1966, 1976, and 2006) were also reviewed.

Based on information available in building lists, maps, and other documents, since its construction in 2004, Building 102 has been used only as an indoor small arms firing range.

On the earliest historical site plan, dated 1943, the area is shown with five buildings present, none of which remain. The five former buildings were: Building 13 (Paint and Oil Storehouse), Building 14 (Cold Storehouse), Building 15 (General Storehouse), Building 16 (General Storehouse), and Building 50 (10,000 gallon Used Oil Tank). Former Building 13 was located within the current footprint of Building 102, adjacent to Fifth Street. Former Building 14 was located south of Building 13, adjacent to Fifth Street and Avenue C. Former Building 15 was located in the southwest portion of the current Building 102 parcel, north of Avenue C. Former Building 16 was located north of Building 15 and west of Buildings 50 and 13. Former Building 50 is shown east of Building 16 and west of Building 13. A railroad line is shown running east/northeast-west/southwest through the parcel, between former Buildings 13 and 14, and 15 and 16 (this railroad track was immediately south of the current location of Building 102).

In an aerial photograph dated 1958, the location that was designated as Building 50 (10,000 gallon Used Oil Tank) on the 1943 map is a parking area. It is therefore assumed that the 10,000 gallon used oil tank was an underground storage tank (UST). The areas around Buildings 13, 14, 15, and 16 are grass-covered.

Beginning with the 1975 historical map, three additional structures are indicated: Building 125 (Aviation [AV] Lube Tank) and Buildings 559 and 560 (Used AV Lube Tanks) are shown to the north of Building 16. In the 1978 historical map, Avenue C is renamed Fitch Avenue.

On the 1979 historical map, Buildings 50, 125, 559, and 560 are not shown, and the area of former Building 50 is labeled "gravel"; however, Buildings 125, 559, and 560 are visible as aboveground storage tanks in the 1981 aerial photograph (north of Building 16). It is likely that these three buildings/tanks may not have been shown on the 1979 historical map due to their small size.

No changes in the area are noted until the 1984 aerial photograph, in which former Building 14 and former Buildings (ASTs) 125, 559, and 560 are no longer present. No further changes are noted until the 2006 historical map, which shows no buildings present except Building 102, in its current location. Fifth Street is renamed Pegasus Street as well.

Building 102 functioned for its entire history as an indoor small arms firing range used by NAS Brunswick Security. The building contains a five-lane firing range with a bullet trap, consisting of rubber backing material. The building also contains a range master office, restroom, classroom space, weapons cleaning area, and storage areas (Figure 3).

The firing range has been cleaned annually by a Navy contractor who removes and replaces the air filters, and screens the rubber in the bullet trap to collect lead bullets that are caught in the rubber backing. The rubber that is serviceable is placed back in the baffle and the range floor is vacuumed and cleaned (Fagan, 2010).

The NAS Brunswick Removed Transformer Database lists no non-polychlorinated-biphenyl (non-PCB)-containing electrical transformers for Building 102; however, a pad-mounted transformer is located immediately west of Building 102, as observed in the site visit, discussed in Section 4. No information was found regarding the manufacturer or installation date of this transformer. As of July 1, 1979, the United States Environmental Protection Agency (EPA) prohibited all

manufacturing of new PCB-containing electrical equipment (transformers and capacitors). Because the building was built in 2004 it is unlikely that the transformer is PCB-containing.

The NAS Brunswick Aboveground Storage Tank (AST) and Underground Storage Tank (UST) inventory records for Building 102 indicate that no ASTs or USTs have been associated with Building 102 (Environmental Department, 2009).

No oil/water separators (OWS) have been associated with Building 102 (PWD, 2008b).

No septic systems were identified within this parcel, which has historically been (and is currently being) served by the base-wide sanitary sewer system (Navy, 2006).

Information on known NAS Brunswick groundwater contamination areas was reviewed to determine if groundwater underlying the Building 102 parcel could potentially be impacted by another (off-parcel) source. Installation Restoration Program (IRP) Site 17 (Former Pesticide Shop, Building 95) and the Old Navy Fuel Farm (ONFF) Site are approximately 25 to 200 feet east/northeast of the Building 102 parcel. Information available from studies relating to these two IRP sites is presented below.

According to information available from groundwater sampling conducted in relation to Site 17, several compounds were detected in groundwater at concentrations exceeding applicable criteria, including two pesticide compounds at one monitoring well location, and diesel-range organics (DRO) at several well locations. According to groundwater level measurements conducted in relation to Site 17, groundwater flows from that location towards the southeast. Since the Building 102 parcel is located to the west of Site 17, groundwater underlying this parcel is unlikely to be impacted by contaminants from Site 17 (Tetra Tech, 2009).

The ONFF was decommissioned in 1993 and remediated in 2000. Monitoring well MW-NASB-210, located west of Building 102, is part of the ONFF long-term groundwater monitoring program, and is sampled semi-annually as part of that program. Groundwater samples are analyzed for select volatile organic compounds (VOCs) (benzene, toluene, ethylbenzene, total xylenes [BTEX] and methyl tert-butyl ether [MTBE]), DRO, gasoline-range organics (GRO), and monitored natural attenuation (MNA) parameters. During the April and October 2008 groundwater sampling rounds, DRO were detected in MW-NASB-210 at concentrations greater than the Maine Maximum Exposure Guidelines (MEGs) (ESI, 2009).

The April and October 2008 monitoring results for the ONFF site indicate that groundwater flows from the ONFF to the southeast, across Fitch Avenue. Therefore, potentially-impacted groundwater flowing from the ONFF site source is unlikely to significantly impact groundwater underlying the Building 102 parcel, which is located west of the ONFF (ESI, 2009).

4. SITE VISIT AND INVESTIGATION

Site visits were conducted for Building 102 on August 25, 2010 and October 4, 2010 by Mr. James Forrelli, P.E., Mr. Brian Geringer, and Mr. Brandon Smith, P.E., of Tetra Tech. The purpose of the visits was to verify information gathered during the records search and to collect additional information as necessary to prepare this closure report. Tetra Tech personnel were accompanied by Mr. D. Bruce Smith, the NAS Brunswick Hazardous Waste Manager. The building was visually inspected for signs of hazardous waste generation or storage. Site visit observations, recorded on the attached Building Inspection Form ⁽¹⁾, are summarized below:

- At the time of inspection, Building 102 was in good condition; firing range supplies and equipment were present.
- No evidence of hazardous waste residues was observed.

- No signs of a past release (staining, unusual odors, stressed vegetation, etc.) nor structural modifications that could conceal signs of a past release were observed.
- No floor drains were observed in Building 102.
- No peeling or flaking paint was observed on the exterior or interior of the building.
- A pad-mounted transformer was observed immediately west of Building 102. No information regarding the manufacturer or date of manufacture was observed.

Based on the records research and site visit observations, the following conclusions were made regarding the potential for hazardous waste residues to be present at the Building 102 parcel.

Former Building 13, demolished in 1998, served as a paint and oil storehouse for its entire service timeframe. The former building was located on the current footprint of Building 102, and this location would have been significantly re-worked during demolition activities and Building 102 construction activities; possible residue related to the former building would be very difficult to locate and identify. Therefore, the site of the former Building 13 was not targeted for further investigation.

Former Building 14, demolished around 1984, served as a cold storehouse for its entire service timeframe. Based on its use as a storehouse, it is unlikely that any activities within the building would have generated hazardous waste. Therefore, the location of this former building was not targeted for further investigation.

Former Buildings 15 and 16, demolished in 1998, served as general storehouses for their entire service timeframe. Based on their use as storehouses, it is unlikely that any activities within the buildings would have generated hazardous waste. Therefore, the locations of the former buildings were not targeted for further investigation.

Former Building 50, removed around 1979, served as a used oil tank for its entire service timeframe. Based on review of aerial photographs, it is assumed that the 10,000 gallon tank was a UST. The 1979 historical map indicates the area of the former Building 50 as "gravel", which suggests that the tank was excavated and removed and gravel placed at the location. The tank was located immediately west of the current footprint of Building 102, and this location would have been significantly re-worked during Building 102 construction activities; possible residue related to the tank would be very difficult to locate and identify. Therefore, the site of the former Building 50 (10,000 gallon Used Oil Tank) was not targeted for further investigation.

Former Buildings 125, 559, and 560, removed around 1984, served as ASTs for AV lube oil (B125) and waste AV lube oil (B559 and B560) for their entire history. Storage of lube and waste lube oil may have resulted in residual petroleum contamination. There is no record of spills in this location. It is likely that demolition and removal of the surrounding buildings would have removed any potential residual petroleum that may have existed related to the former lube oil tanks. Therefore, the locations of the former buildings/tanks were not targeted for further investigation.

Building 102 served as an indoor small arms firing range for its entire service timeframe; lead-contaminated residue from small arms is present at the building as a result of this activity. To complete a RCRA a closure that would allow unrestricted use of the building requires actions that removes the residue lead contamination levels to the required closure criteria. However, the Town of Brunswick has agreed to continue operation and maintenance of the facility as a small arms firing range by its police department (Braun, 2010). In this case, RCRA closure of the building (intact range) with exception is allowable under certain conditions as follows:

1. The annual cleaning is performed prior to transfer, including the routine servicing and cleaning of the areas outside the bullet traps;
2. The entire facility is inspected to insure that all safeguard systems (bullet traps, air filters, etc.) are intact and fully functional;

3. Documentation is provided to MEDEP indicating that the Town of Brunswick intends to keep the building use as an active firing range, and that the Town is prepared to take responsibility for remediation when the building is no longer used as a firing range; and
4. The owner places an environmental covenant on the building and associated parcel, with conditions indicating that it will be used only as a firing range, it will be properly maintained, and that full remediation will be completed when it is no longer maintained or wanted for its intended use (Vigneault, 2010).

On October 4, 2010, during a site walk with MEDEP, Navy, and Tetra Tech personnel, Mr. Edward Vigneault of MEDEP further stated that a partial RCRA closure would still be required for Building 102, but sampling would not be required if the existing use were continued by the new entity taking ownership (Tetra Tech, 2010).

According to Bruce Smith, NAS Brunswick Hazardous Waste Manager, the annual cleaning at Building 102 has been completed.

Based on a review of known groundwater contamination at NAS Brunswick with respect to the Building 102 parcel location, and based on the review of available information on historical activities that occurred at the parcel, it is likely that groundwater underlying the Building 102 parcel has been impacted by the ONFF source area. This groundwater contamination is being addressed under the Petroleum, Oil, and Lubricants (POL) program.

5. HAZARDOUS WASTE GENERATION AND STORAGE

The records research, site visit observations, NAS Brunswick Environmental Department personnel interviews, and investigation results document that hazardous waste in the form of lead-contaminated residue from small arms was generated at Building 102 while the building was in service. According to NAS Brunswick personnel, in addition to universal waste, other hazardous waste generated at Building 102 included used air filters, lead-contaminated rubber material from the bullet trap, and spent lead bullets.

6. OTHER ENVIRONMENTAL CONSIDERATIONS

The only transformers or tanks known to be associated with the Building 102 parcel are discussed in Sections 3 and 4. No additional transformers or tanks are known of, and no others were observed in the immediate vicinity of the Building 102 parcel.

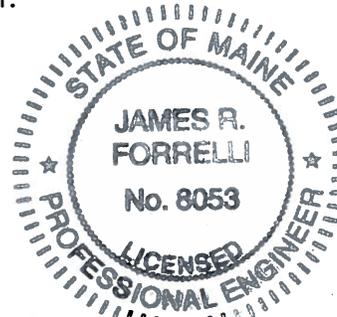
7. LIMITATIONS

This investigation of the hazardous waste closure requirement applies to the Building 102 parcel (as shown on Figure 2) only. The partial RCRA closure certification further requires that the conditions for closure of Building 102 as an intact firing range with exception, as stated above are met.

8. CERTIFICATION

Based on the findings of this investigation as discussed in Sections 3 and 4, there have been activities resulting in the generation, accumulation, or storage of hazardous waste at the Building 102 parcel that consisted of waste oil storage at former Building 50 (10,000 Waste-Oil Tank); waste aviation lubricant storage at former Buildings 559 and 560 (Waste Aviation Lube Tanks); and lead contamination at Building 102 (Indoor Firing Range). With the exception of residual lead contamination associated with Building 102 (subject to the conditions for closure of Building 102 as an intact firing range) and the groundwater contamination associated with the ONFF POL Site as summarized in this Partial Closure report, the hazardous waste closure of the Building 102 parcel was completed in accordance with the provisions of MEDEP Regulations Chapter 851, Standards for Generators of Hazardous Waste, Section 11.


 James Forrelli, P.E.
 Senior Project Engineer
 Tetra Tech NUS, Inc.



(1) The Building Inspection Form provides preliminary information collected during the building inspection, including information from visual observations, Navy personnel interviews, and from documents reviewed during file reviews. It does not reflect any additional information provided at a later date that further clarifies or corrects preliminary information collected during the building inspection and file reviews.

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Sewall, 1981. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, Maine. October 17.

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Sewall, 1989. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, Maine. April 2.

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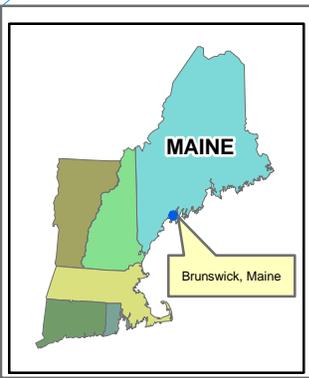
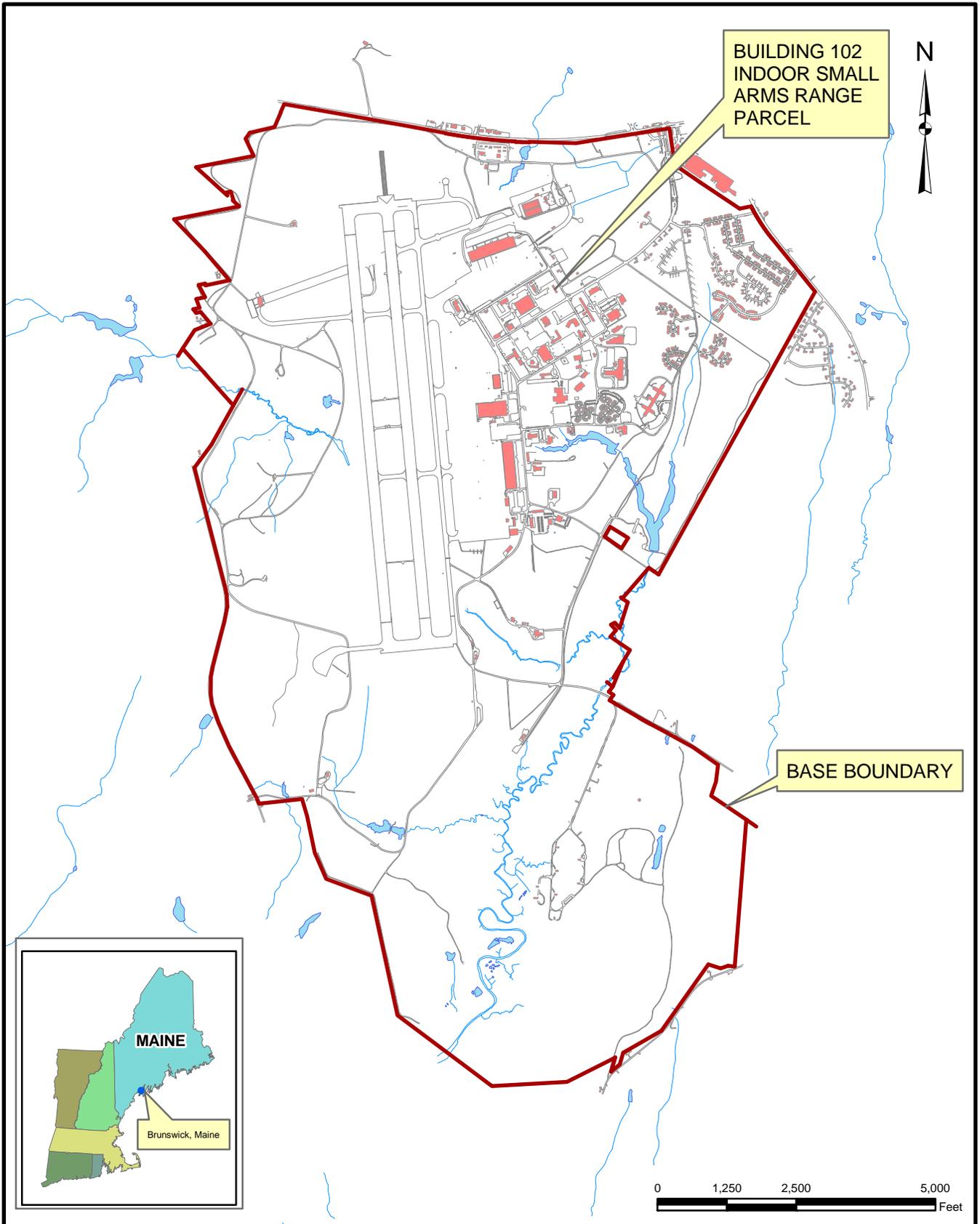
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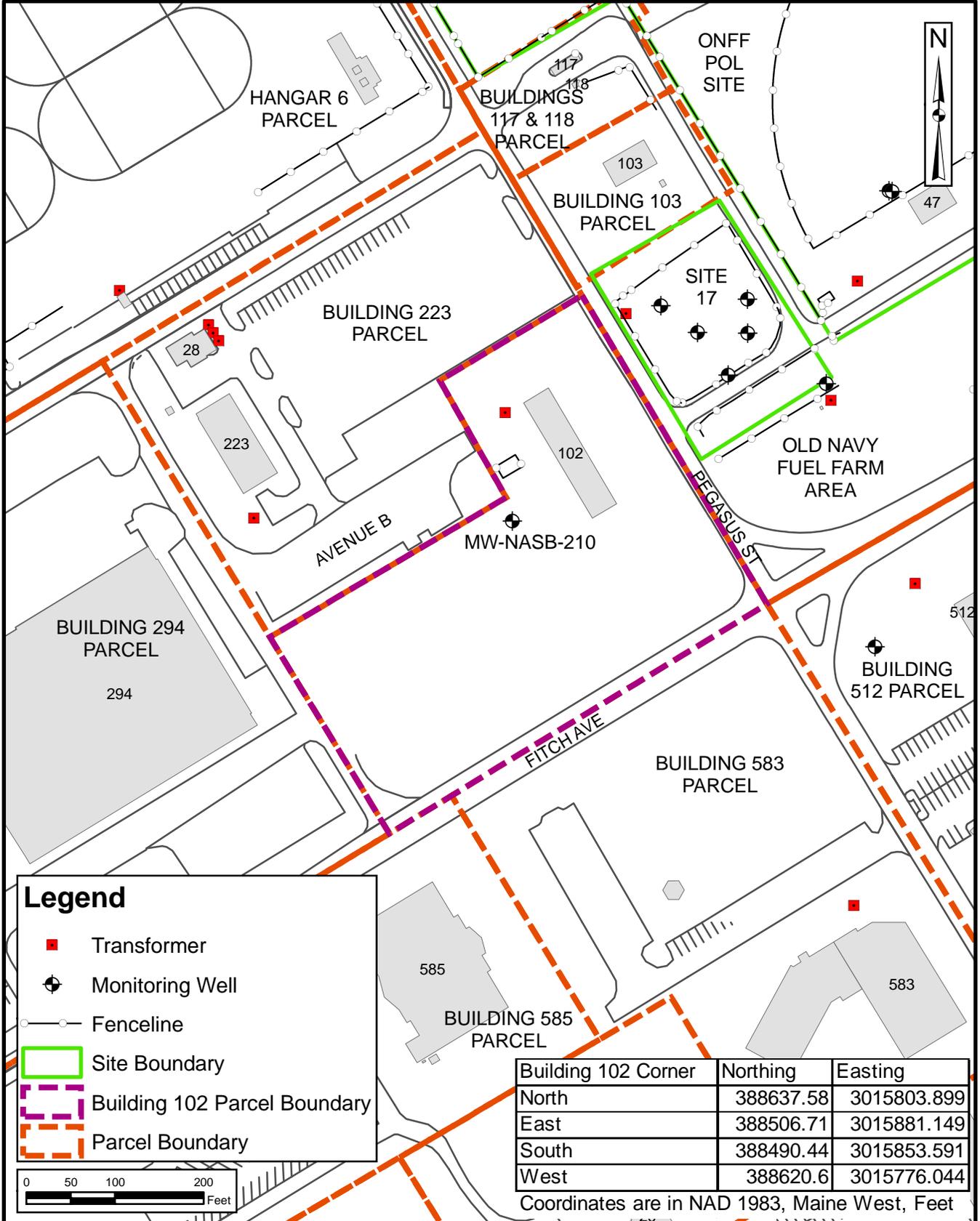
Vigneault, 2010. Email from Edward Vigneault (MEDEP) to Michael Fagan (NAS Brunswick Environmental). "RE: Perspective on Building 102 – Small Arms Range." September 7.



Tetra Tech NUS, Inc.

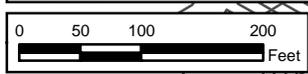
SITE LOCATION MAP
BUILDING 102 - INDOOR SMALL ARMS RANGE PARCEL
RCRA PARTIAL CLOSURE REPORT
NAVAL AIR STATION BRUNSWICK, MAINE

SCALE AS NOTED	
FILE I:\NASB_BLDG_102_LOCUS.MXD	
REV 0	DATE 12/21/10
FIGURE NUMBER 1	



Legend

- Transformer
- ⊕ Monitoring Well
- Fenceline
- ▭ Site Boundary
- ▭ Building 102 Parcel Boundary
- ▭ Parcel Boundary



Tetra Tech NUS, Inc.

SITE LOCATION MAP
 BUILDING 102 - INDOOR SMALL ARMS RANGE PARCEL
 RCRA PARTIAL CLOSURE REPORT
 NAVAL AIR STATION BRUNSWICK, MAINE

SCALE AS NOTED	
FILE I:\NASB_BLDG_102_SITE_MAP.MXD	
REV	DATE
0	12/22/10
FIGURE NUMBER	
FIGURE NO. 2	



JANITOR'S CLOSET

MECHANICAL ROOM

TOILET

RANGE MASTER

FIRING LINE

FIRING RANGE

BULLET TRAP

TRAP CLEANING



TETRA TECH NUS, INC.

FLOOR PLAN
BUILDING 102 - INDOOR SMALL ARMS RANGE PARCEL
RCRA PARTIAL CLOSURE REPORT
NAVAL AIR STATION BRUNSWICK, MAINE

SCALE
AS NOTED

FILE
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REV DATE
0 12/22/10

FIGURE NUMBER
3

**HWSA INSPECTION FORM
HAZARDOUS WASTE STORAGE AREAS CLOSURE
NAS BRUNSWICK
BRUNSWICK, MAINE
CTO WE22**

Inspection Date: 08/25/10 & 10/04/10

Personnel: Brian Geringer / James Forreli, P.E. / Brandon Smith, P.E.

Weather: Rain, 60s

GENERAL BUILDING INFORMATION / USES

Building Name: Building 102 – Indoor Small Arms Range

Function: Indoor small arms firing range

Size: 4,675 SF

Year of Construction: 2004

Building 102 is located in the central portion of NASB Brunswick and is bordered to the north by Avenue B and the Building 223 (NMCI) parcel, to the east by Pegasus Street, the Building 103 (Dog Kennel) parcel and Site 17 and the ONFF, to the south by Fitch Avenue and the Building 583 (Rec Mall) parcel, and to the west by grassed areas and the Building 294 (Supply Warehouse) parcel. It was constructed in 2004 and served as an indoor small arms firing range for NAS Brunswick. Building 102 is a 4,675-square foot single story precast concrete structure on a concrete slab foundation. The building interior consists of a five-lane small arms range, range master office, lobby, restrooms, and storage area. A roof exhaust fan with filter housing is located on the roof for lead dust collection. The building is heated via a natural gas fired heating unit.

HWSA INSPECTION / CONDITION

At the time of inspection, Building 102 was in good condition.

Hazardous waste was generated during the operations at Building 102; and disposed of through Hazardous Waste Department.

No evidence of hazardous waste residues was observed.

No signs of a past release (staining, unusual odors, stressed vegetation, etc.) were observed.

No modifications to the structure, which may conceal signs of a past release, were observed.

POTENTIAL PCB-CONTAINING TRANSFORMERS

No transformers are listed in the NASB transformer database for the Building 102. One pad-mounted transformer is located to the west of Building 102. No additional information was available on the transformer, however, due to the age of the building, the transformer pad likely did not have a PCB-containing transformer.

APPLICABLE REPORTS / DOCUMENTS

Available historical aerial photos and base maps were reviewed for past uses:
1943 Map – Buildings 13 (Paint and Oil Storehouse), 14 (Cold Storehouse), 15 (General Storehouse), 16 (General Storehouse), and 50 (10,000 gallon Used Oil tank) present with the railroad running south of B13, B16, and B50 and Fifth Street to the east and Avenue C to the south.
1946 Map – Same as 1943.
1952 Map - Same as 1946 map.
1956 Map - Same as 1952 map.
1957 Map – Buildings 14 and 50 are not shown; remaining Buildings are shown.
1958 aerial – Buildings 13, 14, 15, 16 are shown with the railroad south of B13 and 16. B50 area is a parking lot, assume it is a UST. Fifth Street is shown to the east, Avenue B to the north, and Avenue C to the south. Remaining area is grassed.
1975 Map – Same as 1956 map, with Buildings 125 (AV Lube Tank) and 559 and 560 (Used AV Lube tanks) to the north of B16.
1978 Map – No buildings are shown. Avenue C renamed to Fitch Avenue.
1978 aerial - same as 1958 aerial.
1979 Map – Building 13, 14, 15, and 16 are present. Buildings 50, 125, 559, and 560 are not shown. Area where B50 was is labeled as gravel.
1981 aerial – same as 1978 aerial; B125, 559, and 560 are now shown north of B16.
1983 Map – Same as 1979 map.
1984 aerial – Building 14 is not shown.
1989 Map – No buildings are shown. Railroad is shown.
1989 aerial – Same as 1984 aerial.
1993 aerial - same as 1989 aerial.
1997 aerial - same as 1993 aerial.
2006 Map – Only Building 102 shown (where B13 was previously); 5th Street renamed Pegasus Street.

There are no above ground storage tanks (ASTs), underground storage tanks (USTs) or oil-water separators (OWS) registered to Building 102.
No spills were reported in the MEDEP or NASB spill logs. Wastewater is disposed of via the sanitary sewer.

HAZARDOUS WASTE STORAGE RECORDS

Hazardous waste quantities records for period 2004 through 2009 disposed of through Hazardous Waste Department according to NAS Brunswick Hazardous Waste Manager, D. Bruce Smith.

MISCELLANEOUS NOTES

The Tetra Tech personnel were accompanied on the inspection by D. Bruce Smith, Hazardous Waste Manager.

(SEE ATTACHED PHOTOGRAPHS)

INSPECTOR SIGNATURE: _____ 

PHOTOGRAPHS



No. 1 Building 102 – Indoor Small Arms Range
Indoor Small Arms Range northwestern elevation

October 25, 2010



No. 2 Building 102 – Indoor Small Arms Range
Indoor Small Arms Range south elevation

October 25, 2010



No. 3 Building 102 – Indoor Small Arms Range
Indoor Small Arms Range firing booths

October 25, 2010



No. 4 Building 102 – Indoor Small Arms Range
Indoor Small Arms Range firing lanes

October 25, 2010



No. 5 Building 102 – Indoor Small Arms Range
Indoor Small Arms Range bullet trap.

October 25, 2010



No. 6 Building 102 – Indoor Small Arms Range
Indoor Small Arms Range - Storage behind the bullet trap.

October 25, 2010



No. 7 Building 102 – Indoor Small Arms Range October 25, 2010
Indoor Small Arms Range – Range Master office and observation area.



No. 8 Building 102 – Indoor Small Arms Range October 25, 2010
Indoor Small Arms Range – pad mounted transformer.