P. O. Box 297
Brunswick, ME 04011
May 1, 1991

Captain H. M. Wilson
Commanding Officer
Naval Air Station Brunswick
Brunswick, ME 04011-5000

Re: Comments on Draft Focused Feasibility Study, Sites 1 and 3.

Dear Captain Wilson:

These remarks focus on the alternatives described in the document. It should be clear that I am biased toward options that will provide a measure of safety through more passive methods (those not dependent on the continuous operation of a lot of mechanical devices). I also add that these comments are based on a "single pass" through the document. I did not check back to see whether some of these issues were picked in the document. Most of the comments concern Option C in the draft.

- The integrity of the slurry wall and the cap are keys to Option C. What sort of history is available on the life of slurry walls and caps? Is there any tendency for break-through of the slurry wall? I understand that plastic liners can be expected to fail as a result of natural movement in the cap and other factors. Is the PVC liner central to the operation of the cap or is the clay going to provide adequate protection by itself?

- The non-treatment of the ground water in Option C is a problem. It seems to me that we should have more information on the time scale for drainage from the site once the wall and cap are in place. Can't this be modeled in some way? I would expect it to exhibit some sort of exponential decrease in which most of the water would be out sooner, with a much longer time required for the final drainage, which may not be significant enough to impact the groundwater.

- Possible new option. Is there any possibility for an Option C augmented in the early years by limited collected of water and treatment? The treatment program might be terminated when seepage from the site has diminished enough.

- Monitoring. If Option C is chosen, what options remain if Option C doesn't do the job or fails in some way? Will monitoring pick up potential problems soon enough that meaningful corrective action can be taken? How will we know of the wall fails? What kind of treatment options could be put in place after Option C is implemented?

- Major Comments about Options D, E, and F concern reliability. Environmental quality depends on the proper operation of active devices over a long period of time. The document expresses doubts about the effectiveness of treatment (presumably under the best of conditions). To this must be added concern about the effects of equipment failure. Can we have more information on the effectiveness and reliability of treatment options?

Sincerely,

S.S. Butcher

Samuel S. Butcher

cc: James Shafer