



STATE OF MAINE

Department of Environmental Protection

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GOVERNOR

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COMMISSIONER

September 23, 1991

Mr. James Shafer
Department of the Navy, Northern Division
Naval Facilities Engineering Command
Building 77-L
Philadelphia Naval Shipyard
Philadelphia, PA 19112-5094

Re: Naval Air Station Brunswick, Draft Proposed Plan-Sites 1
and 3, August, 1991, by E.C. Jordan Co.

Dear Mr. Shafer:

The Maine Department of Environmental Protection (MEDEP) has reviewed the Draft Proposed Plan-Sites 1 and 3, which was submitted to the MEDEP by E.C. Jordan Co. on August 5, 1991 on behalf of the U.S. Department of the Navy for the Naval Air Station Brunswick (NASB) Site.

The MEDEP wishes to submit the following comments to be considered and addressed prior to the issuance of the Proposed Plan for this site.

General Comments:

Alternative 1,3-C (Containment) proposes to minimize groundwater contamination and reduce leachate by isolating the waste material. This will be achieved through the construction of a cap, slurry wall barrier, and a treatment of contaminated groundwater until the groundwater table is lowered below the landfilled material. The reduction of the groundwater table beneath the site will depend, in part, on the integrity of the cap and slurry wall and on the dependability of long term maintenance.

E.C. Jordan estimates that the water table below the site will be initially reduced 6-8 feet and up to 11 feet after 5 years. The MEDEP is concerned that if some of the waste material is still in contact with the water table, then this alternative cannot be assured of meeting chemical specific ARARs for the groundwater under the cap.

In this case the potential for groundwater and surface water contamination will continue to exist. Furthermore, if this



alternative was implemented and found to be ineffective, the presence of the slurry wall could possibly interfere with other alternatives that would then be considered.

Continued monitoring of the groundwater table beneath the site will be necessary. The extraction wells should be maintained indefinitely so that they may be utilized for future regulation of groundwater levels at the site. In this way, the potential for continued leaching of toxic material into the groundwater could be minimized to the greatest extent possible

The target clean-up level of 2 ppb for vinyl chloride at Site 1 and 3 is insufficient to meet the needs of the MEDEP. In order for the MEDEP to concur with this Proposed Plan the remedy must include:

- 1.) a risk evaluation for the site to be conducted following completion of the remedial action
- 2.) additional remedial action, if the calculation of total excess cancer risk exceeds 10^{-4}
- 3.) institutional controls that must remain in place as part of the remedial alternative, if the calculated total excess cancer risk for the site exceeds 10^{-5} .

These conditions were discussed and agreed to during our meeting of October 12, 1991.

If this alternative is presented to the public, it should be made clear that the objective of this alternative is to attempt to isolate the buried material rather than treat the source material to reduce toxicity. At the same time, it would be worth while to bring to the public's attention that Sites 1 & 3 are similar in many aspects to municipal landfills and that this alternative does include features not normally associated with typical landfill closures.

All of these concerns should be addressed in the Proposed Plan in order for the public to evaluate the advantages and disadvantages of this remedy.

Specific Comments:

- | Page | Section | Comments |
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| 1.) | 2-1, section 2.1, Public Informational Meeting and Public Hearing: | Citizens may voice concerns that insufficient time is being allowed between presentation of the plan during the informational meeting and the more formal "hearing" during which their comments and questions will be recorded and transcribed. If the |



public is expected to formally comment on the Proposed Plan the MEDEP believes it would be appropriate to allow the citizens time to consider the information presented in the informational meeting prior to going on record with their "formal" questions and comments. The MEDEP will favor a follow-up hearing 1-2 weeks after the informational meeting if it requested by the public or citizen group.

A more detailed explanation of the hearing process is needed. It should be mentioned that comments made at the hearing will be recorded and transcribed.

- 2.) 2-4, section 2.4, The Navy's Review of Public Comment: The interim remedy will be submitted to the State of Maine, Department of Environmental Protection for review.
- 3.) 2-5, section 2.5, Additional Public Information: Include the MEDEP as an additional source of information for the public.
- 4.) 3-8, section 3.1.1, Groundwater Flow and Subsurface Geology: As presently written, citizens probably will not understand the influence of the clay layer or if the groundwater flowing in fractures and joints has been impacted by contaminants. A statement concerning the impact of contamination on the bedrock aquifer beneath the site should be included.
- 5.) 3-10, section 3.1.4, Leachate Seeps, Surface Water, and Sediment: The types of metals found in leachate samples should be listed. The types of metals identified for remediation and their corresponding target clean up levels should also be listed.
- 6.) 5-2, section 5.0, Proposed Clean up Objectives and Levels: The Navy's long term clean up goals for reducing contamination in groundwater at NASB is to meet MCL's. An explanation of how MCLs differ from MEGs and why MCLs are being utilized would be helpful for public understanding. If the Maximum Exposure Guidelines are not met, the MEDEP cannot concur with any remedy that does not include permanent institutional controls that will preclude the possibility of future groundwater consumption.



- 7.) 6-7, section 6.0, The Navy's Preferred Alternative: Three options for treated effluent have been mentioned. If the Navy wants public reaction to the three options, then the advantages and disadvantages of each option must be discussed.

- 8.) 6-9, section 6.0: The treatment of discharged effluent to "pretreated requirements" and "appropriate requirements or standards" needs to be defined. The Proposed Plan should refer to the fact that this will be finalized.

If treated effluent is discharged to surface water, the treated discharge must meet Ambient Water Quality Criteria (AWQC) prior to discharge. Also, any discharges to surface water must meet the intent of any relevant permit requirements. The volume of discharge cannot be allowed to result in alterations to the normal stream environment.

- 9.) 8-9, section 8.8, State Acceptance: This paragraph should be edited to read "The State of Maine and the USEPA have reviewed this Proposed Plan and have provided comments and recommendations. State and USEPA concurrence with the selected remedy is required under the FFA." The MEDEP feels that it cannot give a final approval to a remedy until it has had the opportunity to evaluate changes to the plan which were requested by other Parties including interested citizen groups.

- 10.) 9-1, section 9.0, Rational: This proposal states that this alternative provides the "best balance among the criteria used by USEPA to evaluate alternatives". If citizens are to be made fully aware of the "balance among criteria" it should also be mentioned that waste material will remain in place without a source treatment being conducted.

- 11.) Glossary: Include a definition for the Maximum Exposure Guideline. This definition should read: "The maximum permissible level of a contaminant in water that is consumed as drinking water. These levels are determined by the State of Maine and applicable to all public water supplies in Maine. The MEG typically coincides with the federal MCL for each regulated contaminant however, risk based calculations have resulted in some specific MEG's that are set at a more stringent level than the MCL."



If you have any concerns or questions regarding these comments, please contact me at (207) 289-2651.

Sincerely,



Ted Wolfe
Division of Site Investigation and Remediation
Bureau of Hazardous Materials and Solid Waste Control

cc: Michael Barden, MEDEP
Sam Butcher, Harpswell Representative
Meghan Cassidy, EPA
Eileen Curry, NASB
Mel Dickenson, E.C. Jordan/ABB Environmental
Donald Gerrish, Town of Brunswick
Marianne Hubert, MEDEP
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Loukie Lofchie, BACSE
Denise Messier, ME DEP
Susan Weddle, Community Representative

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