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To: Eileen Murphy	From: J. Shafer
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11 Beech Drive
Brunswick, ME 04011
January 13, 1992

Mr. James Shafer
Northern Division
Naval Facilities Engineering Command
Building 77L, Code 1421
Philadelphia Naval Base
Philadelphia, PA 19112

Re: Public Comments on Naval Air Station, Brunswick, Maine
"Proposed Plan Eastern Plume", December 1991 and
"Proposed Plan Sites 1 and 3", December 1991

Dear Mr. Shafer:

As a citizen of Brunswick, Maine, and the community
Committee, I have reviewed the above referenced documents and
submit the following comments for inclusion in the record of the
public comment period ending January 15, 1992 (extended by
request at the public hearing on December 12, 1991).

"Proposed Plan Eastern Plume"

Groundwater modeling is proposed to simulate pumping and
determine effects on the plume from the remediation efforts at
Sites 1 and 3. I am concerned about the possible interactions
between the two sites and would encourage you to back up the
modeling results with significant on-site monitoring once the
proposed plans are implemented. In addition, monitoring should
take place outside the plume edge to insure that the
contamination is not advancing during groundwater extraction. It
is anticipated that the leading edge of the plume could reach
Harpwell Cove in 1996 and the remedial action will take 2 years
and 5 months to implement. Considering the elapsed time before
actual construction begins, it is realistic to assume that
pumping will begin sometime in early 1995. Therefore, it is
essential that monitoring outside the plume edge be performed in
the interim prior to implementation to predict any potential
impacts to Harpswell Cove. The results of the groundwater model
should also be used in the placement of the extraction wells in
the eastern plume.

The proposed method of discharge is to the Brunswick Sewer
District. Although I feel this is the preferred option, I do have
a concern over removing water from one watershed (Harpwell Cove)
and discharging it to another (Androscoggin River/Marrymeeting
implementation of this option. The report states that "the
applicable standards before entering the sewer system." At the
December 12, 1991 public meeting, it was stated that the water
would be cleaned up to MCL levels prior to discharge to the sewer
system. POTW pretreatment standards and NPDES permit requirements
(if surface water discharge is implemented) are usually far less

stringent than MCLs. The report leaves these cleanup levels as an option, however since MCLs were stated as the cleanup level prior to discharge at the public meeting, I would hold you to using the MCL values. Also, please address the discharge requirements for acetone, sulphates, and nitrates generated as byproducts during the groundwater treatment. The groundwater should also be tested for radon prior to treatment. If discharge to the FOTW is not feasible, public comment should be solicited for the other options of groundwater recharge or surface water discharge.

More information on the extent of contamination of the solid residue from the groundwater treatment and its ultimate disposal site is needed. If it is not declared a hazardous waste, will disposal options include the Brunswick sanitary landfill or land application? I encourage you to solicit public comments prior to any decision on a disposal site.

"Proposed Plan Sites 1 and 3"

I am concerned over the mercury levels associated with the leachate seeps and the proposed remediation through natural degradation. What proof do you have that lowering the water levels will decrease mercury concentrations from 3.3 mg/kg to 1 mg/kg and in what time frame? Because mercury has the propensity to bioaccumulate and no source removal is anticipated, potential effects to the aquatic and terrestrial organisms should be monitored, including the taking of tissue samples.

I feel the slurry wall and cap should encompass the entire area of sites 1 and 3 including the munitions complex. A break in the slurry wall, especially on the downgradient side of the site will cause leakage out of the landfill area. A slurry wall built around the fence of the munitions area is preferable to a gap in the wall in the munitions area. Also, the integrity of the slurry wall during an earthquake or other seismic event should be addressed.

The effect of the groundwater extraction and lowering of the groundwater table on Mere Brook should be addressed. How will this effect erosion of contaminated sediment, aquatic life, and water levels downstream?

The target cleanup level for vinyl chloride is proposed at the MCL of 2.0 ppb instead of Maine's MEG of 0.2 ppb. I support the state's MEG value and request that you perform any risk assessment or other work required by the Maine DEP to insure that human health concerns are addressed.

Since the waste source is left in place, a 30 year monitoring program is proposed. However, at what intervals will samples be taken, what compounds will be analyzed, and where will the sampling points be? More details are needed to insure that any future leakage will be detected. Also, in the event the base is privatized, the town of Brunswick would like to have a land use plan with deed restrictions stating what areas around sites 1 and 3 would be available for development.

Page 3: Letter to Shafer re: NASA (1/19/92)

The "Eastern Plume" comments on the groundwater cleanup levels prior to discharge, disposal of solid treatment residue, transfer of water from one watershed to another for discharge, and discharge options other than the POTW also apply to this report.

If you have any questions, please feel free to contact me.

Sincerely,

Susan C. Weddle

Susan C. Weddle
Brunswick Community Representative

cc: Donald Gerrish, Town Manager
Ted Wolfe, DEF
Shelia Eckman, EPA
Brunswick Area Citizens for a Safe Environment
Merrymeeting Audubon Society
Friends of Merrymeeting Bay