



STATE OF MAINE

# Department of Environmental Protection

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JOHN R. McKERNAN, JR.

GOVERNOR

April 2, 1992

DEAN C. MARRIOTT  
COMMISSIONER

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

Re: Naval Air Station Brunswick, Draft Record of Decision  
Sites 1 & 3 and Draft Interim Record of Decision Eastern  
Plume, March 1992, by ABB Environmental Services, Inc.

Dear Mr. Shafer:

The Maine Department of Environmental Protection (MEDEP) has completed its review of the Draft Record of Decision Sites 1 & 3 and the Draft Interim Record of Decision Eastern Plume, which were submitted to the MEDEP by ABB Environmental Services, Inc. on March 9, 1992 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 Record of Decision for these sites.

General Comments:

The Draft ROD for Sites 1 & 3 and the Draft Interim ROD for the Eastern Plume should present all information in a similar fashion.

The Draft ROD for Sites 1 & 3 includes a table listing contaminants of concern (table 1). An additional table should be developed that summarizes contaminant concentrations and compares these concentrations with MCLs and MEGs. The Draft Interim ROD for the Eastern Plume effectively presented this information.

The Draft ROD for Sites 1 & 3 (page 45) states that the "POTW's NPDES permit does not currently have pretreatment standards for the compounds that may be detected in the treated water". The Draft Interim ROD for the Eastern Plume (page 31) states that the "treated water would meet

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pretreatment requirements or other applicable standards before entering the sewer (POTW) system". Please correct this apparent contradiction.

The groundwater model which is currently being developed to predict groundwater movement in the vicinity of Sites 1 & 3 and the Eastern Plume should be referenced in both RODs.

Specific Comments, Draft ROD Sites 1 & 3:

Page	Section	Comments
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Page 31,	The Selected Remedy, Clean-up Levels:	Based on discussions held on October 12, 1991 and on correspondence dated November 6, 1991 the MEDEP can concur with the selected remedy for Sites 1 & 3 provided that the following conditions are met:
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- 1.) a risk evaluation for the site to be conducted following completion of the remedial action
- 2.) additional remedial action for Sites 1 and 3, if the 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 are part of the clean-up proposal and should be clearly identified in the Record of Decision. Conditions #2 and 3 will determine whether the selected alternative is protective and whether further action shall be required.

Page 34, Description of Remedial Components, Slurry Wall: As designed, the slurry wall will not fully enclose the landfill area due to the location of the Weapons Compound. Concerns have been raised that this design feature could result in an influx of groundwater from outside the wall through the breach due to the negative gradient created by the operation of the extraction wells. The MEDEP will closely monitor the effectiveness of the slurry wall because of this design feature. The response to comment #12 attempts to address this concern. It would be helpful if this explanation was also included in the text.

Page 38, Description of Remedial Components, Cap: Clarify that the steep bank of Mere Brook will not be disturbed by the construction of the cap.

Page 46, Description of Remedial Components, Environmental Monitoring: Provisions for monitoring groundwater levels within the slurry wall must be a part of the environmental

monitoring program. The slurry wall and cap may not be 100% effective and the removal of accumulating water may be periodically necessary. Provisions for the analysis, treatment and disposal of this water must also be included in the ROD for Sites 1 & 3.

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  
BACSE group  
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Susan Weddle, Brunswick Representative

A:DROD1&3