

**ROBERT G.
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February 2, 1993
File #965Ms. Loukie Lofchie
Brunswick Area Citizens for a Safe Environment
P. O. Box 245
Brunswick, ME 04011**Subject: Review of "Draft Technical Memorandum, Detailed Evaluation of Alternative 5,6E:
Excavation and Use of Subgrade Material at Sites 1 and 3", January 1993, Naval Air
Station Brunswick, Brunswick, Maine.**

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc., has reviewed the "Draft Technical Memorandum, Detailed Evaluation of Alternative 5,6E: Excavation and Use of Subgrade Material at Sites 1 and 3", dated January 1993. The document was prepared by ABB Environmental Services, Inc., (ABB) for the U. S. Department of the Navy for the Naval Air Station Brunswick (NASB), Brunswick, Maine. In response to Susan Weddle's request, we did not evaluate to cost analysis portion of the document. While the Navy had requested receiving comments by February 1, 1993, Jim Shafer of the Navy's Northern Division indicated in our telephone conversation on February 1st that it would be acceptable for the Navy to receive BACSE's comments on February 3, 1993.

The Navy is now proposing to excavate and transport the materials from Sites 5 and 6 to be placed as subgrade fill beneath the landfill cap at Sites 1 and 3 as the new "preferred alternative" for remediation of Sites 5 and 6. The subject document presents the detailed analysis of this remedial alternative for each of the nine evaluation criteria specified in the National Oil and Hazardous Substances Contingency Plan. Other remedial alternatives were subjected to the same analysis in the "Draft Final Supplemental Feasibility Study" released in July 1991.

Our comments on the subject document are as follows:

1. **Page 2.** The final sentence of Section 1.0 states that "Because asbestos would be removed from both Sites 5 and 6, institutional controls and long-term maintenance would not be required at either site." The proposed alternative to excavate and move the material from both Sites 5 and 6 to Sites 1 and 3 meets one of BACSE's objectives to consolidate waste at the Base, thereby reducing the number of "sites" unavailable for future use should the Navy ever close the Base. However, there is still concern that asbestos may not be the only contaminant at Sites 5 and 6. In our November 6, 1992 and January 27, 1993 letters concerning the draft proposed

Page 2, Draft Technical Memorandum, Sites 5 and 6,
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plans for Sites 5 and 6, we made several comments concerning the uncertainty of the type of wastes disposed at Sites 5 and 6, and the need for monitoring should other contaminants (besides asbestos) be identified during excavation. Should any materials or contaminants of concern (other than asbestos) be identified during the excavation of materials from Sites 5 and 6, then further remedial action and possibly long-term monitoring and institutional controls may be necessary.

2. Page 2. The first sentence of Section 2.0 specifies that "nonhazardous" construction rubble and debris will be excavated at Sites 5 and 6. If "hazardous" material is encountered during excavation, how will it be dealt with?

3. Page 3. The Health and Safety Plan will be developed to address potential hazards associated with asbestos exposure. Given the uncertainty of the nature of wastes disposed at these sites in the past, how will site workers evaluate "unknown" hazards, such as from radioactive materials?

4. Page 3. It should be noted that information from monitoring well installation logs could only be used in developing the estimate of excavated material at Site 6 as there were no monitoring wells installed at Site 5.

5. Page 9. If hazardous materials other than asbestos be discovered during excavation of either site, Site Restoration may include signage, institutional controls, or long-term monitoring. This same comment applies to the statement at the bottom of the page that removal of asbestos would allow unrestricted development of the sites in the future.

6. Page 9. What are the physical hazards that will be eliminated by the excavation of rubble and debris from Site 6?

Please do not hesitate to give us a call if you have any questions on the comments above.

Sincerely,
Robert G. Gerber, Inc.

Carolyn A. Lepage
Carolyn A. Lepage, C. G.
Director of Operations

