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March 5, 1993
File #965Ms. Loukie Lofchie
Brunswick Area Citizens for a Safe Environment
P. O. Box 245
Brunswick, ME 04011

Subject: Review of "Draft Final Proposed Plan, Sites 5 and 6, Orion Street Asbestos Disposal Site, Sandy Road Rubble and Asbestos Disposal Site" and "Draft Final Technical Memorandum, Detailed Evaluation of Alternative 5,6E: Excavation and Use of Subgrade Material at Sites 1 and 3", February 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 Final Proposed Plan, Sites 5 and 6, Orion Street Asbestos Disposal Site, Sandy Road Rubble and Asbestos Disposal Site" and the "Draft Final Technical Memorandum, Detailed Evaluation of Alternative 5,6E: Excavation and Use of Subgrade Material at Sites 1 and 3". Both documents are dated February 1993 and were 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 Technical Memorandum.

We had commented on the January 1993 drafts of the Proposed Plan and Technical Memorandum in letters to you dated January 27, 1993, and February 2, 1993, respectively. The Navy responded to comments on the January documents in a letter dated February 18, 1993, from Elizabeth Walter (ABB) to James Shafer (Navy). We have enclosed a copy of ABB's February 18th letter for your reference. Unfortunately, ABB did not receive a copy of our January 27th letter, and therefore did not respond to our comments on the proposed plan. While several of BACSE's concerns have been addressed in the current documents, we reiterate several comments we had made in our January 27th letter.

The Navy will conduct a public comment period from March 29 to April 27, and will hold a public informational meeting and public hearing on April 8, 1993. Both the comment period and the public hearing will provide BACSE with another opportunity to voice their concerns. Written comments on the documents will be accepted if post-marked no later than April 27, 1993.

Page 2, Draft Proposed Plan and Technical Memorandum for Sites 5 and 6, File #965, March 5, 1993

Our comments on the subject documents are as follows:

1. **Proposed Plan, Page 1-1.** We are still uncertain if the potential for radioactive hazards at Sites 5 and 6 has been adequately assessed. It is our understanding that use of dosimeter badges, which were mentioned by the Navy in their response to our comments on the October 1992 draft plan, doesn't necessarily monitor for the entire array of radioactive hazards because some dosimeters are designed to monitor a specific type of radiation. In addition, it is not clear if ABB personnel wore dosimeters when field work was being conducted at Site 5. Therefore, we would ask that the Navy provide additional specific information concerning the type and monitoring capability of the dosimeter badges used by ABB personnel during field investigations at both Sites 5 and 6, and the results of the quarterly testing of these badges.
2. **Proposed Plan, Page 6-1.** Page 6-1 of the December 1992 "Draft Final Proposed Plan, Sites 5 and 6, Orion Street Asbestos Disposal Site, Sandy Road Rubble and Asbestos Disposal Site", states that "Excavation at Site 6 is not considered feasible because the location of waste is not well defined and health hazards associated with excavating potentially large quantities of asbestos materials." What measures has, or will, the Navy employ to surmount these difficulties?
3. **Proposed Plan, Page 6-8.** In response to several BACSE comments concerning the potential for contaminants other than asbestos, the Navy now states that materials other than asbestos encountered during excavation will be characterized and disposed of at an approved special waste or hazardous waste landfill off base. Regulatory agencies would also be notified. Will there be a description of the Navy's criteria for evaluating non-asbestos waste provided for review and comment?
4. **Technical Memorandum, Page 1.** The final sentence of Section 1.0 states that "Because waste 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 NASB, 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 the current proposed plan (see comment 3 above), the Navy states that materials other than asbestos encountered during excavation will be characterized and disposed of at an approved special waste or hazardous waste landfill off base. Depending on the nature of any materials or contaminants of concern (other than asbestos) that might be identified and removed during the excavation of materials from Sites 5 and 6, further remedial action and possibly long-term monitoring and institutional controls may be necessary.

Page 3, Draft Proposed Plan and Technical Memorandum for Sites 5 and 6, File #965, March 5, 1993

5. Technical Memorandum, Page 2. In responding to our February 2nd comment concerning how site workers will evaluate "unknown" hazards, such as from radioactive materials, the Navy indicated that site workers "could" monitor for radioactivity. Will there be any monitoring for potential radioactive hazards at either site by direct-reading instruments? *LET'S DO IT*

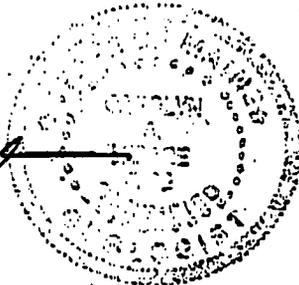
6. Technical Memorandum, Pages 9 and 11. If hazardous materials other than asbestos be discovered during excavation of either site, simply removing the materials for off-site disposal may not be sufficient to allow unrestricted development of the sites in the future. Site Restoration may include signage, institutional controls, or long-term monitoring, depending on the nature and extent of any non-asbestos waste that might be discovered.

We would be happy to discuss any questions you may have. Please do not hesitate to give us a call.

Sincerely,
Robert G. Gerber, Inc.

Carolyn A. Lepage

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



Enc.