



DEPARTMENT OF THE NAVY

NORTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
10 INDUSTRIAL HIGHWAY  
MAIL STOP, #82  
LESTER, PA 19113-2090

IN REPLY REFER TO

5090  
Ser 2005/1821/FE

DEC 09 1993

Mr. Robert Lim  
U.S. Environmental Protection Agency  
Region I  
J.F. Kennedy Federal Building  
Boston, MA 02203-2211

Subj: COMMENTS ON DRAFT EXPLANATION OF SIGNIFICANT DIFFERENCES - SITES  
1 AND 3 DATED NOVEMBER 1993, NAS BRUNSWICK, ME

Déar Sir:

Enclosed is a copy of the Navy responses to your Draft Explanation of Significant Differences.

If additional information is required, please contact Fred Evans at 215-595-0505, x159.

Sincerely,

A handwritten signature in cursive script that reads "F. A. La Greca".

FRANCO LA GRECA  
Head, Restoration Mgmt Section  
By direction of the Commanding Officer

Encl:

(1) Comments on Draft Explanation of Significant Differences

Copy to:

Mr. J. Caruthers, NAS Brunswick  
Ms. Nancy Beardsley, MEDEP  
Mr. Robert McGirr, ABB Environmental

COMMENTS ON SITES 1 AND 3  
EXPLANATION OF SIGNIFICANT DIFFERENCES

General comment: Add the definitions of acronyms POTW, NPDES and OSHA the first time they are used in the text.

Page 1, 4<sup>th</sup> paragraph, last sentence. Revise to read "...will be published in the Brunswick Times-Record". This is the newspaper that has been used in the past to notify the public of ongoing activities at the NAS.

Page 2, 2<sup>nd</sup> paragraph, 3<sup>rd</sup> sentence. Suggest revising to read: "Site 5 contains asbestos materials and Site 6 contains asbestos materials and construction debris."

Page 2, 3<sup>rd</sup> paragraph and Page 7, 3<sup>rd</sup> paragraph, 3<sup>rd</sup> sentence. Suggest revising the word "option" to "alternative" ; to read "...of all the material from Site 8 be considered as a new alternative."

Page 2, 3<sup>rd</sup> paragraph 4<sup>th</sup> sentence. Suggest revising the sentence to read: "...permanent land-use restrictions...".

Page 2, 3<sup>rd</sup> paragraph and 5<sup>th</sup> paragraph. Last sentence in these paragraphs is awkward.

Page 2, 4<sup>th</sup> paragraph 4 and Page 7, 4<sup>th</sup> paragraph. Suggest adding the following sentence at the end of the paragraph: "No comments were received."

Page 2, last paragraph, 3<sup>rd</sup> sentence. Suggest revising to read: "...use of the excavated material as **part of the** necessary subgrade...".

Page 6, last paragraph, 2<sup>nd</sup> line. Suggest adding the words "and treatment" to read "waste and recovery and treatment".

Page 7, 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence. Change "are" to "is".

Page 7, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence. Suggest revising to read: "...sites in question are shown on Figure 1."

Page 7, 2<sup>nd</sup> paragraph, 4<sup>th</sup> sentence. Suggest revising to read: "Site 5 contains asbestos materials and Site 6 contains asbestos materials and construction debris."

Page 7, 2<sup>nd</sup> paragraph, last sentence. Suggest revising to read: "...be used as **part of the necessary...**"

Page 8, 1<sup>st</sup> paragraph, 1<sup>st</sup> sentence. Suggest revising to read "...use of the excavated material as **part of the necessary subgrade...**".

Page 9, 4<sup>th</sup> paragraph, 3<sup>rd</sup> sentence. Sentence should start with "Site 1", not "Site 3".

Page 9, 6<sup>th</sup> paragraph, 5<sup>th</sup> line from bottom of page. Change "beaches" to "reaches".

Page 12, paragraph D.2, 2<sup>nd</sup> sentence. Suggest revising to read: "The cap will also extend over the slurry wall to prevent rainfall infiltration within the slurry wall limits."

Page 12, paragraph D.2, 3<sup>rd</sup> sentence. Revise this sentence to read: "The maximum permeability of the low-permeability barrier layer of the cap will be..."

Page 12, paragraph D.3, 3<sup>rd</sup> and 4<sup>th</sup> sentences. Delete these two sentences.

Page 13, 3<sup>rd</sup> paragraph, last sentence. Revise to read "...become effluent limits for the **groundwater treatment system**".

Page 14, 1<sup>st</sup> paragraph, last sentence. Suggest revising to read: "...use it as **part of the necessary subgrade...**".

Page 14, 1<sup>st</sup> paragraph, last sentence. Should read "...fill under the **landfill cap, which is ...**". The cap is not a RCRA Subtitle C cap. The cap meets RCRA Subtitle C cap performance criteria. This distinction should be maintained throughout the ESD. See other comments for recommended text changes.

Page 14, 5<sup>th</sup> paragraph, 6<sup>th</sup> sentence. Suggest adding "is a conservative" after "This" and before "estimate" and deleting "is".

Page 14, paragraph A.1, 1<sup>st</sup> sentence. Delete " a small amount of" and revise to read "...remove PAH-contaminated...dispose of this material as subgrade fill under...".

Page 14, last paragraph, 5<sup>th</sup> and 6<sup>th</sup> sentences. Suggest revising for consistency. Either state one concentration and one risk, or a range of concentrations and the corresponding range of risks.

Page 15, 2<sup>nd</sup> paragraph. Although the current wording is accurate, please be aware that the construction cost estimate prepared for the bid documents reflect a smaller volume of debris (5,600 cy<sup>3</sup>) than originally estimated and contained in the Site 8 ROD.

Page 15, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence. Revise to read: "No TCL pesticides,...".

Page 15, 2<sup>nd</sup> paragraph, 3<sup>rd</sup> sentence. Revise to read: "Several TAL inorganic ...".

Page 15, paragraph B.1. Suggest revising to read: "Navy will remove asbestos-containing material from Site 5 and construction rubble and asbestos-containing material from Site 6, and dispose of this material as subgrade fill for the proposed landfill cap...".

Page 16, 3<sup>rd</sup> paragraph, 2<sup>nd</sup> sentence. Revise to read: "Asbestos was not detected...".

Page 16, last paragraph. The current wording is accurate. However, please be aware that the construction cost estimate prepared for the bid documents reflect a significantly greater volume of construction debris and asbestos material (totalling 18,700 cy<sup>3</sup>) than originally estimated and presented in the Sites 5 and 6 ROD. This higher estimate is based on additional field efforts conducted in the Spring of 1993.

Page 18, 1<sup>st</sup> paragraph, 2<sup>nd</sup> sentence. Suggest revising to read: "However, since the materials from Sites 5,6, and 8 were determined...".

Page 18, 3<sup>rd</sup> paragraph, 2<sup>nd</sup> sentence. Suggest revising to read: "...rather, they are abandoned sites which are...Sites 5, 6, and 8 as part of the required fill...".

Page 18, last paragraph, 3<sup>rd</sup> sentence. Revise to read: "...requirement is appropriate are the purpose...".

Page 18, last paragraph, 4<sup>th</sup> sentence. Revise to read: "...the purpose of the landfill cap...in the Sites 1 and 3 ROD...to prevent migration of the hazardous wastes from Sites 1 and 3 into the groundwater."

Page 18, last paragraph, 5<sup>th</sup> sentence. Revise to read: "Since the landfill cap will meet the performance criteria of a RCRA Subtitle C cap, it will provide equal or greater protectiveness than the requirements set forth in the Maine Solid Waste Regulations, the Maine regulations are not appropriate." Also, note that the Maine Solid Waste Regulations were identified as an ARAR in the ROD and Design Summary Report.

Last page. No entries were made in Table 1 for the Maine Solid Waste Management Rules.