

**EXPLANATION OF SIGNIFICANT DIFFERENCES
AT SITES 1 AND 3
NAVAL AIR STATION BRUNSWICK, MAINE**

September 1994

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**DECLARATION FOR THE
EXPLANATION OF SIGNIFICANT DIFFERENCES**

SITE NAME AND LOCATION

Sites 1 and 3
Naval Air Station Brunswick (NASB or NAS Brunswick)
Brunswick, Maine

STATEMENT OF PURPOSE

This decision document sets forth the basis for the determination to issue the attached Explanation of Significant Differences (ESD) for Sites 1 and 3 at the NAS Brunswick Superfund Site in Brunswick, Maine.

STATUTORY BASIS FOR ISSUANCE OF THE ESD

Under Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), if the lead agency determines that the remedial action at a Site differs significantly from the Record of Decision (ROD) for that Site, the lead agency shall publish an explanation of the significant differences between the remedial action being undertaken and the remedial action set forth in the ROD and the reasons such changes are being made. Section 300.435(c) of the National Contingency Plan (NCP), and EPA guidance (OSWER Directive 9355.3-02), indicate that an ESD, rather than a ROD amendment, is appropriate where the changes in issue do not fundamentally alter the overall remedy with respect to scope, performance, or cost. Because the adjustments to the remedial action do not fundamentally alter the overall remedy for the Sites 1 and 3 with respect to scope, performance or cost, this ESD is properly being issued.

In accordance with Section 300.435(c) of the NCP, this ESD will become part of the Administrative Record which is available for public review at both the NASB Public Works Office and the Curtis Memorial Library, both in Brunswick, Maine. In addition, a notice that briefly summarizes this ESD will be published in the Brunswick Times Record.

OVERVIEW OF THE ESD

The 1992 ROD for Sites 1 and 3 at NASB requires that the selected remedy combine both containment of waste and recovery of contaminated groundwater to obtain a comprehensive approach for site remediation. In summary, the selected remedy included the following components: construction of a cap over the landfills; construction of a slurry wall around the waste to divert clean water away from the landfills; extraction of contaminated groundwater contained within the cap/slurry wall system; and treatment of extracted groundwater by chemical oxidation,

flocculation, clarification and filtration to remove inorganic compounds, and ultraviolet/oxidation to destroy organic compounds prior to discharge. The selected remedy also includes implementation of a long-term monitoring program; and requires institutional controls and land-use restrictions.

By this ESD, the Navy, as lead agency, with concurrence from EPA and Maine Department of Environmental Protection, is including the movement of material from Sites 5, 6, and 8 at NASB to Sites 1 and 3 in the remedial action for Sites 1 and 3. Sites 5, 6, and 8 are additional sites at NASB undergoing remediation as part of the CERCLA process. Site 5 contains asbestos materials, and Site 6 contains asbestos materials and construction debris. The material at Site 8 includes a small volume of soil contaminated with polynuclear aromatic hydrocarbons, and construction debris/rubble. The material excavated from Sites 5, 6 and 8 will be used as necessary subgrade material in the construction of the cap at Sites 1 and 3.

In October 1992, a Proposed Plan was issued outlining a containment option for Site 8. Since waste was to be left in place under this alternative, permanent land-use restrictions were a necessary component of the remedy. During the public comment period, the Navy received a substantial number of comments asking that removal of all of the material from Site 8 be considered as a new alternative. The main reason for this request was the community's desire to avoid the need for permanent land-use restrictions to be placed on small parcels of land. Since Site 8 is less than one acre in size and contains primarily construction debris and rubble, evaluation of this new alternative indicated that excavation (with the use of the material as subgrade fill for the cap to be constructed at Sites 1 and 3) was feasible and cost-effective.

In March 1993, the Navy issued a second Proposed Plan for Site 8 outlining excavation of all material and use as subgrade fill at Sites 1 and 3 as the preferred alternative, and a second public comment period was held. No comments were received.

Subsequent to the Navy's response to the public comments on Site 8, the Navy evaluated alternatives for remedy selection at Sites 5 and 6. Anticipating that the public would raise the same issues for Sites 5 and 6 (which are only one-half acre and one acre respectively), the Navy proposed excavation of materials from these sites as the preferred alternative. This alternative involves excavation of a small volume of asbestos pipes from Site 5, and excavation of asbestos-containing material and construction debris from Site 6 with use of the excavated material as part of the necessary subgrade for Sites 1 and 3. This preferred alternative was determined to be feasible and cost-effective.

The use of excavated material from Sites 5, 6, and 8 as subgrade for the cap at Sites 1 and 3 does not fundamentally alter the overall remedy for Sites 1 and 3 with respect to scope, performance or cost.

DECLARATION

For the foregoing reasons, by my signature below, I approve the issuance of an Explanation of Significant Differences for Sites 1 and 3 at Naval Air Station Brunswick, in Brunswick, Maine and the changes stated therein.

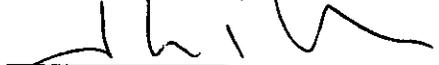
By: 
D.J. Nelson

Date 13 Sep 94

Title: Captain, U.S. Navy
Commanding Officer
Naval Air Station
Brunswick, Maine

DECLARATION

For the foregoing reasons, by my signature below, I approve the issuance of an Explanation of Significant Differences for Sites 1 and 3 at Naval Air Station Brunswick, in Brunswick, Maine and the changes stated therein.

By: 
John P. DeVillars

Date 9/30/94

Title: Regional Administrator
U.S. Environmental Protection Agency, Region I

**EXPLANATION OF SIGNIFICANT DIFFERENCES
SITES 1 AND 3
NAVAL AIR STATION BRUNSWICK
BRUNSWICK, MAINE**

I. INTRODUCTION

A. Site Name and Location

Site Name: Sites 1 and 3
Naval Air Station Brunswick (NASB or NAS
Brunswick)

Site Location: Brunswick, Maine

B. Lead and Support Agencies

Lead Agency: United States Department of the Navy (Navy)

Support Agencies: United States Environmental Protection
Agency (EPA)

Maine Department of Environmental Protection
(MEDEP)

Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) §120(e), the Navy, EPA and MEDEP entered into a Federal Facility Agreement (FFA), dated October 19, 1990 regarding the cleanup of environmental contamination of NASB. The FFA sets forth the roles and responsibilities of each of the parties.

C. Legal Authority

Under CERCLA §117(a), the National Contingency Plan (NCP) §300.435(c), and EPA guidance (OSWER Directive 9355.3-02), if the lead agency determines that differences in the remedial action significantly change, but do not fundamentally alter the remedy selected in the Record of Decision (ROD) with respect to scope, performance, or cost, the lead agency shall publish an explanation of the significant differences between the remedial action being undertaken and the remedial action set forth in the ROD and the reasons such changes are being made.

D. Summary of this Explanation of Significant Differences (ESD)

The 1992 ROD for Sites 1 and 3 at NASB requires that the selected remedy combine both containment of waste, and recovery and treatment of contaminated groundwater to obtain a comprehensive approach for site remediation. In summary, the selected remedy included the following components: construction of a cap over

the landfills; construction of a slurry wall around the waste to divert clean water away from the landfills; extraction of contaminated groundwater contained within the cap/slurry wall system; and treatment of extracted groundwater by chemical oxidation, flocculation, clarification and filtration to remove inorganic compounds, and ultraviolet/oxidation to destroy organic compounds prior to discharge. The selected remedy also includes implementation of a long-term monitoring program; and requires institutional controls and land-use restrictions.

By this ESD, the Navy, as lead agency, with concurrence from EPA and MEDEP, is including the movement of material from Sites 5, 6, and 8 at NASB to Sites 1 and 3 in the remedial action for Sites 1 and 3. The locations of the sites in question are shown on Figure 1. Sites 5, 6, and 8 are additional sites at NASB undergoing remediation as part of the CERCLA process. Site 5 contains asbestos materials, and Site 6 contains asbestos materials and construction debris. The material at Site 8 includes a small volume of soil contaminated with polynuclear aromatic hydrocarbons (PAHs), and construction debris/rubble. The material excavated from Sites 5, 6 and 8 will be used as part of the necessary subgrade material in the construction of the cap at Sites 1 and 3.

In October 1992, a Proposed Plan was issued outlining a containment alternative for Site 8. Since waste was to be left in place under this alternative, permanent land-use restrictions were a necessary component of the remedy. During the public comment period, the Navy received a substantial number of comments asking that removal of all of the material from Site 8 be considered as a new option. The main reason for this request was the community's desire to avoid the need for permanent land-use restriction to be placed on small parcels of land. Since Site 8 is less than one acre in size and contains primarily construction debris and rubble, evaluation of this new alternative indicated that excavation (with the use of the material as subgrade fill for the cap to be constructed at Sites 1 and 3) was feasible and cost-effective (ABB ES, Inc., 1993).

In March, 1993, the Navy issued a second Proposed Plan for Site 8 outlining excavation of all material and use of the excavated material as part of the necessary subgrade fill at Sites 1 and 3 as the preferred alternative, and a second public comment period was held. No comments were received.

Subsequent to the Navy's response to the public comments on Site 8, the Navy evaluated alternatives for remedy selection at Sites 5 and 6. Anticipating that the public would raise the same issues for Sites 5 and 6 (which are only one-half acre and one acre respectively) the Navy proposed excavation of materials from these sites as the preferred alternative. This alternative involves excavation of a small volume of asbestos pipes from Site

5, and excavation of asbestos-containing material and construction debris from Site 6 with use of the excavated material as necessary subgrade for Sites 1 and 3. This preferred alternative was determined to be feasible and cost-effective.

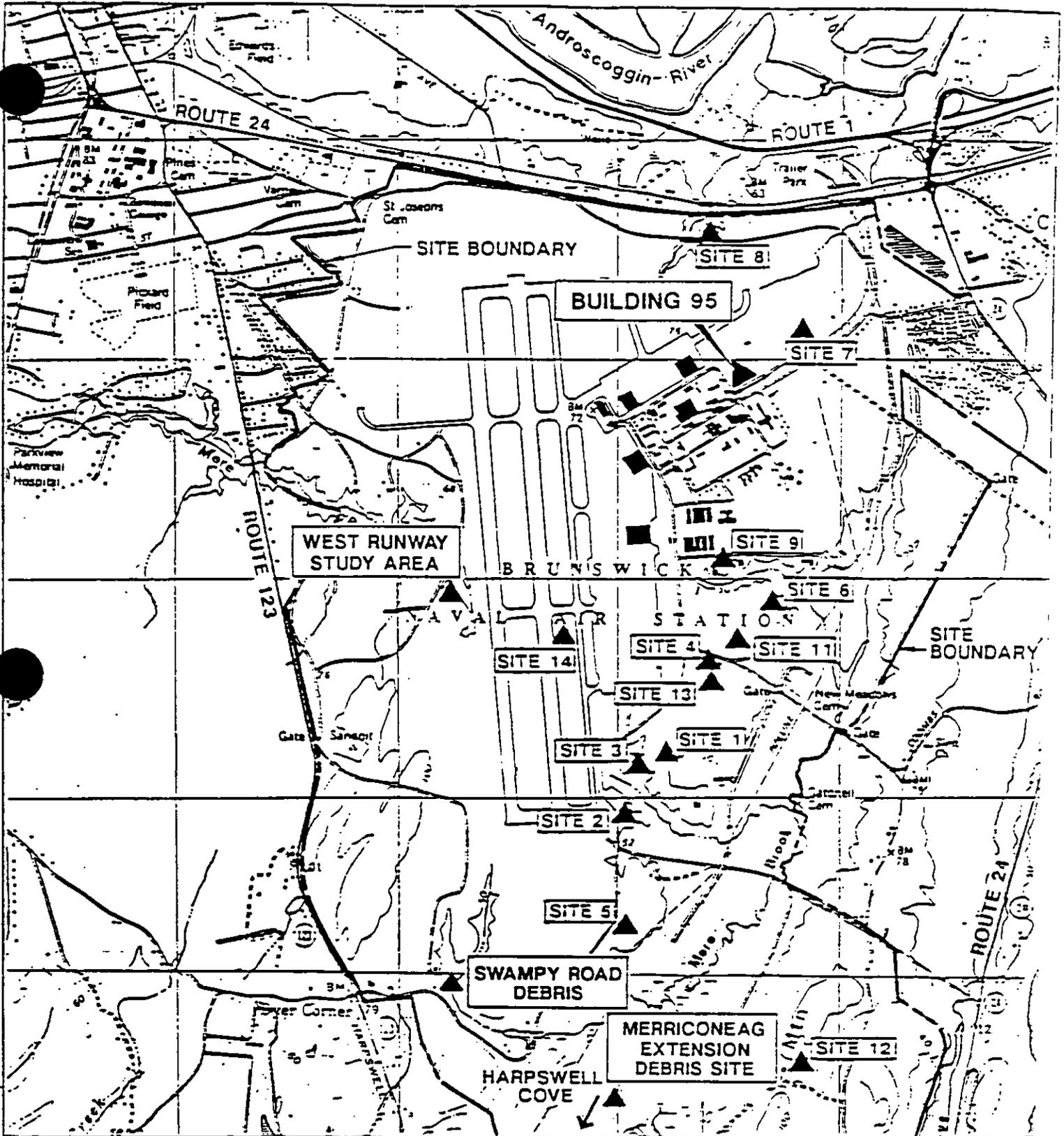
The use of excavated material from Sites 5, 6, and 8 as subgrade material for the cap at Sites 1 and 3 does not fundamentally alter the overall remedy for Sites 1 and 3 with respect to scope, performance or cost. These adjustments will not impact the other aspects of the original remedy: construction of a cap and slurry wall; extraction and treatment of contaminated groundwater; long-term monitoring; and institutional controls and land-use restrictions.

E. Availability of Documents

This ESD shall become part of the administrative record for Sites 1 and 3. Both the ESD and the administrative record are available to the public at the following locations.

Public Works Office
Naval Air Station Brunswick
Brunswick, Maine 04011
(207) 921-2445

Curtis Memorial Library
23 Pleasant Street
Brunswick, Maine 04011
Hours:
Monday-Wednesday: 9:30 a.m. - 8:00 p.m.
Thursday-Friday: 9:30 a.m. - 6:00 p.m.
Saturday: 9:30 a.m. - 5:00 p.m.



SOURCE: U.S.G.S. QUADRANGLES, BRUNSWICK, AND ORRS ISLAND, ME. DATED 1984 AND 1978. 7.5 MINUTE SERIES.



QUADRANGLE LOCATION

SCALE IN FEET



FIGURE 1
SITE LOCATION MAP

II. SUMMARY OF SITE HISTORY, ENFORCEMENT HISTORY AND SELECTED REMEDY

A. Site Name, Location, and Description

NAS Brunswick is a National Priorities List (NPL) site. There are currently 13 areas (Sites) within NAS Brunswick under investigation. This ESD relates to Sites 1 and 3. These sites were grouped together based on their proximity and common historical land use (i.e., landfill areas).

NAS Brunswick is located south of the Androscoggin River between Brunswick and Bath, Maine, south of Route 1 and between Routes 24 and 123. Undisturbed topography at NAS Brunswick is characterized by low, undulating hills with deeply incised brooks; ground surface elevations range from mean sea level (MSL) in lowland drainage areas and the Harpswell Cove estuary, to over 110 feet MSL west and southeast of the southern end of the runways. Topography in the developed areas of the base has been modified by construction, with ground surface elevations generally ranging from 50 to 75 feet above MSL.

NAS Brunswick is located on 3,094 acres. The operation area (approximately 138 acres) lies east of the two parallel runways and consists of numerous office buildings, a steam plant, fuel farm, barracks, recreational facilities, base housing, hangars, repair shops, and other facilities to support NAS Brunswick aircraft. Forested areas (approximately 48 percent), grasslands (approximately 28 percent), and paved areas (approximately 12 percent) comprise most of the base property. The remaining 12 percent of the base includes the operations area (approximately 5 percent) and miscellaneous shrubland, marsh and open water. The southern edge of the base borders coves, and estuaries of the Gulf of Maine and Atlantic Ocean.

Property uses surrounding NAS Brunswick are primarily suburban and rural residential, with some commercial and light industrial uses along Routes 1, 24 and 123. An elementary school, a college, and a hospital are located within 1 mile of the western base boundary.

The general area of Site 1 covers more than 60 acres, although the specific area of documented refuse disposal is much smaller, approximately 8.5 acres. Site 3 consists of approximately 1.5 acres and is contiguous to Site 1. Site 1 is currently an open, slightly rolling, grass-covered field bordered to the north, west, and east by woodlands, and to the south by the Weapons Compound and steep embankments bordering the Mere Brook beaver marsh. Site 3 is next to Site 1 to the southwest, and currently consists of a small knoll covered with grass and a pine grove.

Lowland areas along the Mere Brook beaver marsh are heavily

wooded. The slopes along portions of the brook are typically very steep in the areas next to the landfill.

Groundwater associated with the site is not used for potable purposes or any other uses. The base is connected to a public water supply administered by the Brunswick-Topsham Water District, with the exception of the golf course. The golf course area is distant from Sites 1 and 3 and is not affected by groundwater flow from Sites 1 and 3. Mere Brook, south of Sites 1 and 3, receives drainage from the runways as well as runoff and leachate from the landfills. The brook is not commonly used for recreational activities in the beaches near Sites 1 and 3 because access to this area is restricted. Mere Brook flows into the Atlantic Ocean at Harpswell Cove, which is designated as a potential aquaculture area by the State of Maine. Harpswell Cove supports various commercially important fish species.

B. Site History

NAS Brunswick is an active facility supporting the U.S. Navy's antisubmarine warfare operations in the Atlantic Ocean and Mediterranean Sea. The base's primary mission is to operate and maintain P-3 Orion aircraft. NAS Brunswick first became active in the 1940s during World War II, and underwent major expansion in the 1950s.

Sites 1 and 3 are located within a restricted area in the central portion of NAS Brunswick. Historical records indicate that the Site 1 landfill was used from 1955 to 1975. Material reportedly disposed of in this landfill included garbage, food waste, refuse, waste oil, solvents, pesticides, petroleum products, paint wastes, aircraft and automobile parts, and various chemicals.

Site 3 is defined as the area across from Site 1, next to the access road into the Weapons Compound. Historical information reports that Site 3 operated as a disposal area from 1960 to 1973. Wastes disposed of at this site included solvents, paints, and isopropyl alcohol. No waste material was observed at Site 3 and only low-level soil contamination was reported. Although Site 3 was originally believed to be a separate disposal area from Site 1, field sampling activities did not show a clear delineation between these two sites.

Based on the proximity of the two sites, common historical land use, and hydrogeologic characteristics, the impacts of past disposal practices from Sites 1 and 3 cannot be distinguished. Therefore, these areas of contamination are combined and discussed as one site. Test pit information and field sampling results were used to estimate the combined size of the landfills at 10 acres. The waste estimate is based on test pit data and boring logs. The waste in the trench area of the landfill is

approximately 20 feet in the deepest areas with the depth of waste decreasing to the east and west. An average depth of 15 feet was assumed to estimate an approximate combined refuse volume of 300,000 cubic yards (yd³) for Sites 1 and 3.

Environmental contamination was observed in several media at Sites 1 and 3, including soils, groundwater, leachate/sediment, and surface water/sediment. Contaminants detected above background levels include PAHs and pesticides in soil; volatile organic compounds (VOCs) and inorganic compounds in groundwater; inorganic compounds, VOCs, and semivolatiles (SVOCs) in leachate; and inorganic compounds in surface water. The source area for this contamination is considered to be the landfill (Sites 1 and 3) located north and west of the Weapons Compound. No single, well-defined source of contamination has been identified in the landfill.

C. Enforcement History

The enforcement history at NAS Brunswick, including Sites 1 and 3, is summarized as follows:

- In 1983, an Initial Assessment Study (IAS) was completed detailing historical hazardous material usage and waste disposal practices at NAS Brunswick.
- In 1984, a Pollution Abatement Confirmation Study was conducted. These studies recommended further investigation of seven of the nine hazardous waste sites originally identified (i.e., Sites 1 through 4 and 7 through 9).
- In 1987, NAS Brunswick was placed on the CERCLA National Priorities List.
- The Remedial Investigation/Feasibility Study (RI/FS) process was begun in 1987 for seven sites.
- In February 1988, the first Technical Review Committee (TRC) meeting was held. TRC meetings have been held quarterly since that initial meeting.
- Four sites were added to the RI/FS program in 1989 i.e., Sites 11, 12, 13, 14), as well as the two additional sites originally identified in the IAS (i.e., Sites 5 and 6). Site 10, originally identified in the IAS, was no longer under the jurisdiction of NAS Brunswick and is not included in the Installation Restoration Program (IRP).
- In August 1990, the Navy completed Draft Final RI and Phase I FS reports (E.C. Jordan Co., 1990a and 1990b). The Draft Final RI Report described field sampling investigations, geology, and hydrogeology, and presented contamination and

risk assessments. The Draft Final Phase I FS identified remedial action objectives, and developed and screened remedial alternatives for the nine original sites studied in the Draft Final RI. The Navy prepared Focused Feasibility Study (FFS) Reports for Sites 1 and 3 and Site 8 in 1991 and 1992, respectively (E.C. Jordan Co., 1991c and 1992b). The Navy submitted: a Draft Final Supplemental RI Report for the Eastern Plume and Sites 5, 6, 8, 12, and 14 in August 1991; an FFS Report for Sites 5, 6, and 12 in July 1991; and a Feasibility Study for Sites 2, 4, 7, 9, 11, and 13 in March 1992 (E.C. Jordan Co., 1991b, 1991a, and 1992a, respectively).

- In October 1990, the Navy entered into a Federal Facility Agreement (FFA) with the USEPA and the MEDEP regarding the cleanup of environmental contamination at NAS Brunswick. The FFA sets forth the roles and responsibilities of each party, contains deadlines for the investigation and cleanup of hazardous waste sites, and establishes a mechanism to resolve disputes among the parties.
- The Navy and EPA signed a ROD for Sites 1 and 3 in June 1992, one for Sites 5 and 6 in August 1993, and one for Site 8 in August 1993. The MEDEP provided a letter of concurrence on these RODs.

D. Selected Remedy

The 1992 ROD for Sites 1 and 3 requires that the selected remedy combine both a source control and groundwater component to obtain a comprehensive approach for remediation. In summary, the selected remedy includes the following components:

1. A slurry wall will be placed around the landfill (with the exception of the Weapons Compound Area), and will divert clean groundwater flow around the site, preventing groundwater contact with waste material. Because the slurry wall will be sealed into the underlying silty clay, and will have a permeability of 10^{-6} to 10^{-7} centimeters per second (cm/sec), minimal volumes of groundwater will flow beneath or through the wall. The final location of the slurry wall will be outside the limits of the waste.
2. A low-permeability cap will be placed over the landfill area to reduce the amount of rainfall infiltration and thereby reduce leachate production. The cap will also extend over the slurry wall to prevent rainfall infiltration within the slurry wall limits. The maximum permeability of the low-permeability barrier layer of the cap will be 1×10^{-7} cm/sec. The landfill cover, as required by the Sites 1 and 3 ROD, was designed to meet or exceed Resource Conservation and Recovery Act (RCRA) guidance as described in the USEPA

document, Design and Construction of RCRA/CERCLA Final Covers (USEPA, 1991b) and sound engineering design practices.

3. A groundwater extraction system was designed and will be installed to remove contaminated groundwater trapped beneath the cap and within the slurry wall system. Approximately 16 million gallons of water (i.e., one pore volume) will be removed and treated. Capturing this contaminated water will prevent it from discharging to Mere Brook. These extraction wells will decrease the time required for this water to drain naturally. The extraction wells included in the selected remedial alternative will facilitate the collection of the volume of contaminated ground-water remaining beneath the landfill cap following installation of the slurry wall and reduce the time required to lower groundwater to levels below the waste.
4. The extracted groundwater will be pumped to a central treatment plant located outside the Sites 1 and 3 area for the pretreatment of dissolved metals and treatment of VOCs. The groundwater treatment system will handle extracted water from Sites 1 and 3, as well as the Eastern Plume.

Extracted groundwater from Sites 1 and 3 will be run through a pretreatment system to remove inorganic compounds to the appropriate discharge limits (based on the Publicly Owned Treatment Work's (POTW) National Pollution Discharge Elimination System (NPDES) permit) and concentrations that would not interfere with VOC treatment. Once the inorganics are removed, the water will be treated to remove or reduce VOCs using ultraviolet(UV)/oxidation system. This technology destroys organic compounds in water through chemical oxidation enhanced by exposure to UV light. In the oxidation process, organic contaminants are broken down into simpler, nonhazardous substances such as carbon dioxide, water, salts, organic and inorganic acids, or other by-products.

5. Treated water will be piped and tied into the existing base sanitary sewer system (Brunswick Sewer District POTW). Pretreatment standards will be established for the water before it enters the POTW. These standards will then become effluent limits for the groundwater treatment system.
6. This alternative requires the implementation of institutional controls and land-use restrictions to prevent future use of the landfills or groundwater. Restrictions on land use will be incorporated by NAS Brunswick to prevent future land use of the landfills and groundwater affected by the landfills.

7. A long-term environmental monitoring program will be implemented following construction of the components discussed above. The monitoring program will include groundwater flow and quality, surface water, sediment, and leachate seeps. Data collected under this program will provide information necessary to assess the effectiveness of the cap and slurry wall at diverting clean water around the site and preventing further contamination of groundwater. In addition, the monitoring program will assess the dispersion and degradation of contamination that has already emanated from the landfill. At a minimum, the environmental monitoring program will continue for 30 years.

Five-year reviews will also be required as part of the environmental monitoring program. The five-year reviews will assess the performance of the containment system.

III. DESCRIPTION OF SIGNIFICANT DIFFERENCES

The selected remedy for Sites 1 and 3 as described in section II.D. above is contained in the Site 1 and 3 ROD issued in June 1992. Under the remedial actions selected in two later RODs, one for Sites 5 and 6, and one for Site 8, both issued in August 1993, the Navy will excavate material from those sites and use it as part of the necessary subgrade fill under the landfill cap which meets RCRA Subtitle C requirements and is to be constructed as part of the remedial action at Sites 1 and 3.

Since the June 1992 ROD for Sites 1 and 3 did not include the use of material from Sites 5, 6 and 8 as subgrade fill for the Sites 1 and 3 cap, the Navy, as lead agency, is issuing this ESD. Sections III.A. and III.B. below describe Sites 5 and 6, and Site 8, including the remedial actions selected for those sites and the relationship of those actions to the remedial action for Sites 1 and 3. Section III.C. and Table 1 describe additional Applicable or Relevant and Appropriate Requirements (ARARs) to the Sites 1 and 3 remedial action which will result from the use of material from Sites 5, 6 and 8 at Sites 1 and 3.

A. Site 8

Under an August 1993 ROD, the Navy will excavate and remove PAH-contaminated surface soil, construction debris and rubble from Site 8, and dispose of this material as part of the necessary subgrade fill under the landfill cap to be constructed at Sites 1 and 3.

The approximately 0.6-acre Site 8, the Perimeter Road Disposal Site, is located in the northern portion of the base. Site 8 was a disposal area reportedly used from 1964 to 1974 for rubble and debris from NAS Brunswick. The site is a flat, open area with steep, wooded embankments down to two small tributaries bordering

the site on the northeast and northwest. Seeps have been observed at the base of the slope of the embankment down to the northeastern tributary. Groundwater associated with the site is not used for potable or any other purposes.

Soil boring and test pit samples were collected in the disposal area at Site 8 to identify contaminants in surface and subsurface soils. Environmental contamination was present in only four test pits located in the northeastern area of Site 8. PAHs were determined to be the only contaminant of concern at this site. PAHs were detected in surface soil only, except for one test pit where they were found in decreasing concentrations to a depth of 8 feet. Carcinogenic PAH concentrations ranged from less than 2.5 to 30 mg/kg. The total incremental human health carcinogenic risks associated with exposure to the levels of carcinogenic PAHs were 1×10^{-4} and 3×10^{-4} . This range is a conservative estimate based on a future residential scenario assuming exposure to the average and maximum detected concentrations of carcinogenic PAHs. Toxicity Characteristic Leachate Procedures (TCLP) tests were run on the soils contaminated with PAHs. The soil samples passed the TCLP tests indicating that the contaminants have very low mobility in the present site.

Groundwater, surface water, sediment and leachate seeps were all evaluated during the remedial investigation. No TCL pesticides, polychlorinated biphenyls (PCBs), VOCs or SVOCs were detected in Site 8 monitoring wells. Several TAL inorganic contaminants were detected above background levels. However it was determined that the presence of these inorganics (sodium, chloride and cyanide) were associated with runoff from an upgradient salt storage pile. This salt pile has since been moved. Cadmium was also detected, however the presence of cadmium is associated with the native geologic soils in the area and is not associated with the past activities at Site 8. Inorganic and organic compounds were detected sporadically in surface water, sediment, and leachate seeps adjacent to Site 8. Analytes detected in these media were either not associated with past disposal practices at Site 8, or if they were potentially associated were not present at levels that posed a human health or environmental risk.

The selected remedy for Site 8 as outlined in the ROD includes excavation of an upper estimate of 14,000 yd³ of soil, construction rubble and debris. Since the issuance of the ROD, it has been determined that the excavation will be in the amount of approximately 5600 yd³. Material will be excavated and transported to Sites 1 and 3. Transportation of the material entails loading it onto dump trucks and transporting it by truck approximately 3 miles on NASB property to Sites 1 and 3. The material will then be placed and spread at Sites 1 and 3 as subgrade material before landfill cap construction. No permanent land-use restrictions will be required at Site 8 since all PAH contaminated soil and construction debris will be removed.

Use of the Site 8 material was not anticipated in 1992 when the ROD for Sites 1 and 3 was finalized. However, an engineering evaluation performed during the design phase of the Sites 1 and 3 cap indicated that the material from Site 8 is suitable subgrade material and will provide some of the required fill necessary for completion of the Sites 1 and 3 remediation.

B. Sites 5 and 6

Under an August 1993 ROD, the Navy will remove asbestos-containing material from Site 5, and construction rubble and asbestos-containing material from Sites 6, and dispose of this material as part of the necessary subgrade fill under the landfill cap to be constructed at Sites 1 and 3.

Records indicate that Site 5 was used once, in 1979, as a disposal area for asbestos-covered pipes. The pipes were placed in two trenches, one measuring three by 20 by seven feet deep and the second, alongside the first, measuring 15 by 30 by 10 feet deep. One trench contained six asbestos pipes from four to 12 feet long and the second contained six to eight corrugated pipes with smaller asbestos pipes inside. The trenches were covered with soil.

Site 6 was reportedly used for general dumping of construction debris until the late 1970s. A site inspection in 1980 reported asbestos-covered pipes protruding from the surface. Aircraft parts were also reportedly disposed of at Site 6. At the current time, pipe, concrete, asphalt and other debris are visible at the surface.

Geophysical surveys performed at Site 5 confirmed the location of the reported trenches. Geophysical surveys at Site 6 did not locate any primary anomalies, but did suggest a large semi-circular region where asbestos and rubble were likely disposed. Additional test pitting further defined the area of disposal.

Surface soil samples were collected from both Sites 5 and 6. Asbestos was not detected in any of these samples. Groundwater contamination resulting from asbestos (the contaminant of concern at Sites 5 and 6) was not of concern, because asbestos fibers are very stable in the subsurface environment and are not likely to migrate (Gilbert, et al., 1981). Therefore, groundwater at Sites 5 and 6 was not monitored for asbestos. TCLP tests were run on the soils from Site 6. The soil samples passed the TCLP tests indicating that there are no contaminants present that are mobile in the environment.

Human health and ecological risk assessments were conducted for Sites 5 and 6. While there is a human health risk associated with future potential exposure to asbestos during construction or

excavation-related activities, quantitative risks cannot be estimated because no subsurface samples were collected. The potential for increased future risks remains if any asbestos is uncovered by activities at either site. The concentrations of contaminants in surface soils at Sites 5 and 6 were within background concentrations and are not expected to adversely affect environmental receptors.

The selected remedy for Sites 5 and 6 as outlined in the ROD includes excavation of approximately 12 yd³ of asbestos-containing soil and pipes from Site 5, and approximately 8,800 yd³ of material including 250 yd³ of asbestos-containing materials from Site 6. All excavated asbestos-containing material will be containerized in two layers of polyethylene, each with a minimum thickness of 6 millimeters (mils), in accordance with the Maine Landfill Disposal Regulations for the Management, Testing, and Disposal of Special Wastes (38 MRSA 1304, Chapter 405.4) and labeled in accordance with Occupational Safety and Health Administration regulations (29 CFR 1910.1001 or 1926.58). Since the issuance of the ROD, it has been determined that approximately 18,700 yd³ of construction debris and asbestos material will be excavated from Sites 5 and 6. Containerized asbestos material and other excavated debris will be transported by dump trucks to Sites 1 and 3 where it will be used as subgrade fill beneath the landfill cap. No permanent land-use restrictions will be required at Sites 5 and 6 since all asbestos-containing material and debris will be removed.

Use of the Sites 5 and 6 material was not anticipated in 1992 when the ROD for Sites 1 and 3 was finalized. However, an engineering evaluation performed during the design phase of the Sites 1 and 3 cap indicated that the material from Sites 5 and 6 is suitable subgrade material and will provide some of the required fill necessary for completion of the Sites 1 and 3 remediation.

C. Applicable or Relevant and Appropriate Requirements

Use of material from Sites 5, 6, and 8 as subgrade fill at Sites 1 and 3 requires compliance with certain ARARs, in addition to those discussed in the 1992 ROD for Sites 1 and 3. These additional ARARs, including a synopsis of the requirement and the action to be taken to meet the requirement, are set forth in Table 1 of this ESD.

Federal and State requirements relating to asbestos. Since the material from Sites 5 and 6 to be used as subgrade fill at Sites 1 and 3 includes asbestos, the following Federal and State requirements relating to asbestos must be met:

- Clean Air Act, National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 61. The NESHAP

requirements for emission limits and personnel training for the handling of asbestos (Subpart M) are relevant and appropriate to the activities regarding the placement of asbestos material from Sites 5 and 6 under the landfill cap at Sites 1 and 3.

- Occupational Safety and Health Act, General Industry Standards, 29 CFR Part 1910. Training requirements specified in 29 CFR § 1910.120 for workers at asbestos sites are applicable and will be complied with.
- Occupational Safety and Health Act, General Industry Standards, 29 CFR Part 1926. This regulation, which specifies the type of safety equipment and procedures for handling asbestos, is applicable.
- Maine Solid Waste Management Regulations, Testing and Disposal of Special Wastes, MSWMR, Chapter 405. Section 405.4, which sets forth the requirements that apply to the storage, transport and disposal of asbestos wastes, is applicable.
- Maine Asbestos Abatement Regulations, Chapter 136. This regulation which specifies the minimum work practice requirements for asbestos abatement contractors, is applicable.

Resource Conservation and Recovery Act (RCRA), Land Disposal Restrictions, 40 CFR Part 268. Under this regulation, land disposal of RCRA hazardous waste is restricted without specified treatment. However, since the material from Sites 5, 6, and 8 were determined not to be RCRA hazardous waste, this regulation is not an ARAR.

Federal and State permits. Although Sites 1 and 3 will be receiving waste material from Sites 5, 6, and 8, it is not necessary for Sites 1 and 3 to obtain any Federal or State permits. Sites 1, 3, 5, 6, and 8 may be viewed as separate CERCLA facilities which are non-contiguous, as defined in CERCLA §109(1). Therefore, Sites 1 and 3 are exempt from the permit requirements because, under the NCP, it is appropriate to aggregate these facilities for the purpose of the response action since they are related based on the threat posed and based on geography (55 FR 8690, March 8, 1990).

Maine Solid Waste Management Regulations, MSWMR, chapters 400 and 401. These regulations set forth requirements for alterations (including vertical and horizontal expansions) to and closure of solid waste disposal sites. The use of material from Sites 5, 6 and 8 as fill material necessary for completion of the remedial

action at Sites 1 and 3 does not constitute a horizontal or vertical expansion of a solid waste disposal site (EPA letter, dated May 3, 1994). Therefore, the requirements of MSWMR, chapters 400 and 401, which relate to expansions of solid waste disposal sites (e.g. the bottom liner requirements of MSWMR §401.4(C)), are not applicable to this action.

These requirements, however, may be relevant since they relate to the disposal of solid waste, including debris from construction demolition such as that found at Site 8 and special waste such as asbestos that is at Sites 5 and 6. Even if these requirements are relevant, in order for them to be ARARs which must be complied with, they must also be determined to be appropriate. For the reasons discussed below, these regulations are not appropriate.

Two of the factors to be looked at in determining if a requirement is appropriate is the purpose of the requirement and whether another requirement is available that more fully matches the circumstances of the site (CERCLA Compliance with Other Laws Manual: Interim Final, EPA/540/G-89/006, August 1988, at 1-67). Here, the purpose of both the RCRA Subtitle C requirements (which are ARARs for the remedial action contained in the Site 1 and 3 ROD) and the requirements of MSWMR, chapters 400 and 401, which relate to expansions of solid waste disposal sites is to prevent hazardous wastes from Sites 1 and 3 from infiltrating into the ground water. Since the RCRA Subtitle C requirements will provide equal or greater protectiveness than the requirements regarding the expansion of solid waste disposal sites set forth in the MSWMR, chapters 400 and 401, these Maine regulations are not appropriate.

TABLE 1
Action-Specific ARARS, Criteria, and Guidance For Sites 1 and 3

ESD: Site 1 and 3
 Naval Air Station Brunswick

REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	ACTION TO BE TAKEN TO MEET ARAR
<p><u>Federal</u> CAA - National Emission Standards for Hazardous Pollutants (NESHAPs) (40 CFR Part 61).</p>	<p>Relevant and Appropriate</p>	<p>Emission of asbestos fibers are regulated Subpart M of 40 CFR Part 61. This regulation includes requirements for inactive waste disposal sites for asbestos mills and manufacturing and fabricating operations, for active waste disposal sites, and for waste disposal for demolition and renovation operations. It does not include requirements for inactive waste disposal sites like Sites 1 and 3. Therefore, the NESHAP will not be applicable. However, the regulation is "relevant and appropriate" to the control of asbestos fiber emissions at an inactive waste disposal site for demolition and renovation operations because the situation is sufficiently similar.</p>	<p>The NESHAP requirements for emission limits, and personnel training for the handling and disposal of asbestos (Subpart M) are relevant and appropriate to activities regarding the placement of asbestos material beneath the landfill cap at Sites 1 and 3. Actions taken at Site 1 and 3 will meet these requirements.</p>
<p>Occupational Safety and Health Act (OSHA) - General Industry Standards (29 CFR Part 1910).</p>	<p>Applicable</p>	<p>These regulations specify the 8-hour time-weighted average concentration for various organic compounds. Training requirements for workers at hazardous waste, including asbestos, operations are specified in 29 CFR Part 1910.120.</p>	<p>Proper respiratory equipment will be worn if it is impossible to maintain the work atmosphere below the concentration. Workers performing activities at Site 1 and 3 will be required to have completed specific training requirements.</p>
<p>OSHA - Safety and Health Standards (29 CFR Part 1926).</p>	<p>Applicable</p>	<p>This regulation specifies the type of safety equipment and procedures for handling asbestos.</p>	<p>All appropriate safety equipment will be worn on site. In addition, safety procedures will be followed during on-site activities.</p>
<p>Resource, Conservation, Recovery Act (RCRA) Land Disposal Restrictions (LDRs) (40 CFR Part 268).</p>	<p>Not Applicable</p>	<p>Land disposal of RCRA hazardous waste is restricted without specified treatment. It must be determined that the waste meets the definition of one of the specified restricted wastes and the remedial action must constitute "placement" for the land disposal restrictions to be considered applicable. For each hazardous waste, the LDRs specify that the waste must be treated either by a treatment technology or to a concentration level prior to disposal in a RCRA Subtitle C permitted facility.</p>	<p>Waste materials from Site 5, 6 and 8 were established as non-hazardous under RCRA definitions; therefore these materials can be disposed of at Site 1 and 3 without begin subject to LDRs.</p>

TABLE 1
Action-Specific ARARS, Criteria, and Guidance For Sites 1 and 3

ESD: Site 1 and 3
Naval Air Station Brunswick

REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	ACTION TO BE TAKEN TO MEET ARAR
<u>State</u> Maine Solid Waste Management, Testing, and Disposal of Special Wastes (MEDEP Regulations Chapter 405).	Applicable	Section 405.4 sets forth requirements that apply to the storage, transport and disposal of asbestos wastes.	These requirements will pertain to activities involving disposal of asbestos material at Site 1 and 3.
Maine Asbestos Abatement Regulations (MEDEP Regulations Chapter 136)	Applicable	These regulations specify the minimum work practice requirements for asbestos abatement contractors.	These requirements will apply to remedial activities at Site 1 and 3.

IV. SUPPORT AGENCY COMMENTS

EPA and MEDEP have participated with the Navy as lead agency in developing the changes to the 1992 ROD for Sites 1 and 3 and support the changes described in this ESD. The changes allow the Navy to address contamination at NAS Brunswick in a manner which addresses the concerns of the community, and is still protective of human health and the environment.

V. STATUTORY DETERMINATIONS

Considering the above-described adjustments to the selected remedy set forth in the 1992 ROD for Sites 1 and 3, the Navy believes that the remedy remains protective of human health and the environment; complies with Federal and State requirements that are applicable or relevant and appropriate to the remedial action; and is cost-effective. In addition, the revised remedy results in permanent solutions (removal of all wastes) for Sites 5, 6 and 8.

VI. PUBLIC PARTICIPATION

This ESD, as well as all other material relating to investigations and remedy selection, is available for public review at the locations listed in Section I above. The public has had the opportunity to comment during the public comment periods for Sites 5 and 6, and Site 8 and supports the actions described in this ESD.

REFERENCES

- ABB Environmental Services, Inc., 1993. "Technical Memorandum, Detailed Evaluation of Alternative 8D, Excavation and Use as Subgrade Material at Sites 1 and 3"; Portland, Maine; March.
- E.C. Jordan Co., 1990a. "Draft Final Remedial Investigation Report NAS Brunswick"; Portland, Maine; August.
- E.C. Jordan Co., 1990b. "Draft Final Phase I Feasibility Study Development and Screening of Alternatives NAS Brunswick"; Portland, Maine; August.
- E.C. Jordan Co., 1991a. "Focused Feasibility Study Report for Sites 5, 6, and 12 NAS Brunswick"; Portland, Maine; July.
- E.C. Jordan Co., 1991b. "Draft Final Supplemental RI for Eastern Plume and Sites 5, 6, 8, 12 and 14 NAS Brunswick"; Portland, Maine; August.
- E.C. Jordan Co., 1991c. "Focused Feasibility Study Sites 1 and 3 NAS Brunswick"; Portland, Maine; October.
- E.C. Jordan Co., 1992a. Feasibility Study for Sites 2, 4, 7, 9, 11, and 13 NAS Brunswick"; Portland, Maine; March.
- E.C. Jordan Co., 1992b. "Focused Feasibility Study Site 8 NAS Brunswick"; Portland, Maine; April.
- Gilbert, et al., 1981. "Experimental Studies of Amphibole Stability"; Reviews in Minealogy - Amphiboles and other Hydrrous Pyriboles; vol. 9B, pp. 229-267.
- Letter to Nancy Beardsley, Maine Department of Environmental Protection, from Robert Lim, U.S. Environmental Protection Agency, regarding Maine Solid Waste Disposal Regulations, chapters 400-401 -- Explanation of Significant Differences for Sites 1 and 3; May 3, 1994.
- Maine Department of Environmental Protection, Maine Asbestos Abatement Regulations, Chapter 136.
- Maine Department of Environmental Protection, Maine Solid Waste Regulations, Chapters 400 and 401.
- Maine Department of Environmental Protection, Maine Landfill Disposal Regulations for the Management, Testing, and Disposal of Special Wastes, 38 MRSA 1304, Chapter 405.4.
- Northern Division, Naval Facilities Engineering Command (NAVY), 1992. "Record of Decision for Remedial Action at Sites 1 &

3 NAS Brunswick"; Portland, Maine; June.

Northern Division, Naval Facilities Engineering Command (NAVY), 1993a. "Record of Decision for Remedial Action at Sites 5 & 6 NAS Brunswick"; Portland, Maine; August.

Northern Division, Naval Facilities Engineering Command (NAVY), 1993b. "Record of Decision for Remedial Action at Sites 8 NAS Brunswick"; Portland, Maine; August.

Occupational Safety and Health Administration, 29 CFR Part 1910.

Occupational Safety and Health Administration, 29 CFR § 1910.1001 or § 1926.58.

Occupational Safety and Health Administration, 29 CFR Part 1926.

U.S. Environmental Protection Agency (USEPA), 1988. "CERCLA Compliance with Other Laws Manual: Interim Final"; EPA/540/G-89/006; August.

U.S. Environmental Protection Agency (USEPA), 1989. "Interim Final Guidance on Preparing Superfund Decision Documents"; OSWER Directive 9355.3-02; June.

U.S. Environmental Protection Agency (USEPA), 1991. "Design and Construction of RCRA/CERCLA Final Covers"; Office of Research and Development, Washington, D.C.; EPA/625/4-91/025; May.

U.S. Environmental Protection Agency (USEPA), 1992. "National Oil and Hazardous Substances Pollution Contingency Plan (The NCP)"; OSWER Directive 9200.2-14; January.

GLOSSARY

ARARS	Applicable or Relevant and Appropriate Requirements
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
ESD	Explanation of Significant Differences
FFA	Federal Facilities Agreement
FFS	Focused Feasibility Study
FR	Federal Register
IAS	Initial Assessment Study
IRP	Installation Restoration Program
MEDEP	Maine Department of Environmental Protection
MSL	Mean sea level
MSWMR	Maine Solid Waste Management Regulations
NAS	Naval Air Station
NCP	National Oil and Hazardous Substances Contingency Plan
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NPDES	National Pollution Discharge Elimination System
NPL	National Priorities List
OSHA	Occupational Safety and Health Administration
OSWER	Office of Solid Waste and Emergency Response
PAH	Polynuclear Aromatic Hydrocarbon
PCBs	Polychlorinated biphenyl
POTW	Publicly Owned Treatment Works
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
SVOC	Semivolatle Organic Compound
TAL	Target Analyte List
TCL	Target Compound List
TCLP	Toxicity Characteristic Leaching Procedure
TRC	Technical Review Committee
USEPA	United States Environmental Protection Agency
UV	Ultraviolet
VOC	Volatile Organic Compound

APPENDIX A
RESPONSE TO NAVY COMMENTS



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

Dear 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,

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, 4th 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, 2nd paragraph, 3rd sentence. Suggest revising to read: "Site 5 contains asbestos materials and Site 6 contains asbestos materials and construction debris."

Page 2, 3rd paragraph and Page 7, 3rd paragraph, 3rd 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, 3rd paragraph 4th sentence. Suggest revising the sentence to read: "...permanent land-use restrictions..."

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

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

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

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

Page 7, 2nd paragraph, 1st sentence. Change "are" to "is".

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

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

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

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

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

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

Page 12, paragraph D.2, 2nd 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, 3rd 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, 3rd and 4th sentences. Delete these two sentences.

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

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

Page 14, 1st 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, 5th paragraph, 6th sentence. Suggest adding "is a conservative" after "This" and before "estimate" and deleting "is"

Page 14, paragraph A.1, 1st 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, 5th and 6th 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, 2nd 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 cy³) than originally estimated and contained in the Site 8 ROD.

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

Page 15, 2nd paragraph, 3rd 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, 3rd paragraph, 2nd 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 cy³) 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, 1st paragraph, 2nd sentence. Suggest revising to read: "However, since the materials from Sites 5,6, and 8 were determined..."

Page 18, 3rd paragraph, 2nd 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, 3rd sentence. Revise to read: "...requirement is appropriate are the purpose..."

Page 18, last paragraph, 4th 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, 5th 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.

Response to Navy Comments Dated December 3, 1993

(Comments are typed as they appear in original comment letter.)

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

Response - Text will be revise accordingly

2. **Comment** - Page 1, 4th 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 NASB.

Response - Text "...will be published in the Brunswick Times Record" will be added to paragraph.

3. **Comment** - Page 2, 2nd paragraph, 3rd sentence. Suggest revising to read: "Site 5 contains asbestos materials, and Site 6 contains asbestos materials and construction debris."

Response - Text will be revised accordingly.

4. **Comment** - Page 2, 3rd paragraph and Page 7, 3rd paragraph, 3rd sentence. Suggest revising the word "option" to "alternative"; to read "...of all the material from Site 9 be considered as a new alternative."

Response - Text will be revised accordingly.

5. **Comment** - Page 2, 3rd paragraph 4th paragraph. Suggest revising the sentence to read: "...permanent land-use restrictions..."

Response - Text will be revised accordingly.

6. **Comment** - Page 2, 3rd paragraph and 5th paragraph. Last sentence in these paragraphs is awkward.

Response - Sentence will be deleted.

7. **Comment** - Page 2, 4rd paragraph, and Page 7, 4th paragraph. Suggest adding the following sentence at the end of the paragraph: "No comments were received."

Response - Text will be revised accordingly.

8. **Comment** - Page 2, last paragraph, 3rd sentence. Suggest revising to read: "...use of the excavated materials as part of the necessary subgrade..."

Response - Text will be revised accordingly.

9. **Comment** - Page 6, last paragraph, 2nd line. Suggest adding the words "and treatment" to read "waste and recovery and treatment."
- Response** - Text will be revised accordingly.
10. **Comment** - Page 7, 2nd paragraph, 1st line. Change "are" to "is."
- Response** - Text will be revised accordingly.
11. **Comment** - Page 7, 2nd paragraph, 2nd sentence. Suggest revising to read: "...sites in question are shown on Figure 1."
- Response** - Text will be revised accordingly.
12. **Comment** - Page 7, 2nd paragraph, 4th sentence. Suggest revising to read: "Site 5 contains asbestos materials and Site 6 contains asbestos materials and construction debris."
- Response** - Text will be revised accordingly.
13. **Comment** - Page 7, 2nd paragraph, last sentence. Suggest revising to read: "...be used as **part of the** necessary subgrade..."
- Response** - Text will be revised accordingly.
14. **Comment** - Page 8, 1st paragraph, 1st sentence. Suggest revising to read: "...use of the excavated material as **part of the** necessary subgrade..."
- Response** - Text will be revised accordingly.
15. **Comment** - Page 9, 4th paragraph, 3rd sentence. Sentence should start with "Site 1," not "Site 3."
- Response** - Text will be revised accordingly.
16. **Comment** - Page 9, 6th paragraph, 5th line from bottom of page. Change "beaches" to "reaches."
- Response** - Text is correct and does not need to be revised.
17. **Comment** - Page 12, paragraph D.2, 2nd sentence. Suggest revising to read: "The cap will also extend over the slurry wall to prevent rainfall infiltration within the slurry wall limits."
- Response** - Text will be revised accordingly.

18. **Comment** - Page 12, paragraph D.2, 3rd sentence. Revise sentence to read: "The maximum permeability of the low-permeability barrier layer of the cap will be..."

Response - Text will be revised accordingly.

19. **Comment** - Page 12, paragraph D.3, 3rd and 4th sentence. Delete these two sentences.

Response - The EPA feels that sentences provide an adequate summary of the selected remedy, and will remain in the paragraph.

20. **Comment** - Page 13, 3rd paragraph, last sentence. Revise to read: "...become effluent limits for the groundwater treatment system."

Response - Text will be revised accordingly.

21. **Comment** - Page 14, 1st paragraph, last sentence. Suggest revising to read: "...use it as part of the necessary subgrade..."

Response - Text will be revised accordingly.

22. **Comment** - Page 14, 1st 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.

Response - Text will be revised to read "a landfill cap which meets RCRA Subtitle C requirements and which is to be constructed, and the distinction will be maintained throughout the text..

23. **Comment** - Page 14, 5th paragraph, 6th sentence. Suggest adding "is a conservative" after "This" and before "estimate" and deleting "is."

Response - Text will be revised accordingly.

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

Response - Text will be revised to read "...remove PAH-contaminated...dispose of this material as part of the necessary subgrade fill under...."

25. **Comment** - Page 14, last paragraph, 5th and 6th sentences. Suggest revising for consistency. Either state one concentration and one risk, or a range of concentrations and the corresponding range of risks.

Response - Text will be revised to state the associated risk range which will be consistent with the stated concentration range.

26. **Comment** - Page 15, 2nd 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 yd³) than originally estimated and contained in the Site 8 ROD.

Response - Insert the following sentence after 2nd sentence. "Since the issuance of the ROD, it has been determined that the excavation will be in the amount of approximately 5600 yd³."

27. **Comment** - Page 15, 2nd paragraph, 2nd sentence. Revise to read: "No TCL pesticides..."

Response - Text will be revised accordingly.

28. **Comment** - Page 15, 2nd paragraph, 3rd sentence. Revise to read: "Several TAL inorganic..."

Response - Text will be revised accordingly.

29. **Comment** - 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..."

Response - Text will be revised accordingly.

30. **Comment** - Page 16, 3rd paragraph, 2nd sentence. Revise to read: "Asbestos was not detected..."

Response - Text will be revised accordingly.

31. **Comment** - 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 yd³) 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.

Response - Before "Containerized..." insert sentence, "Since the issuance of the ROD, it has been determined that approximately 18,700 yd³ construction debris and asbestos material will be excavated from Sites 5 and 6."

32. **Comment** - Page 18, 1st paragraph, 2nd sentence. Suggest revising to read: "However, since the materials from Sites 5, 6, and 8 were determined..."

Response - No change is needed since comment and existing text are the same.

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

Response - Text will be revised accordingly.

34. **Comment** - Page 18, last paragraph, 3rd sentence. Revise to read: "...requirement is appropriate are the purpose..."

Response - Response not needed. Last paragraph has been deleted and replaced with a new paragraph.

35. **Comment** - Page 18, last paragraph, 4th 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."

Response - See response to Maine DEP second comment. Last paragraph has been deleted and replaced with a new paragraph.

36. **Comment** - Page 18, last paragraph, 5th 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 ROD Summary Report.

Response - See response to State of Maine second comment. Last paragraph has been deleted and replaced with a new paragraph.

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

Response - Entry has been deleted because entry does not effect Sites 1 and 3, but only effects Site 8.

APPENDIX B
RESPONSE TO STATE OF MAINE COMMENTS



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN R. McKERNAN, JR.
GOVERNOR

DEAN C. MARRIOTT
COMMISSIONER

DEBRAH RICHARD
DEPUTY COMMISSIONER

December 20, 1993

Mr. Robert Lim
USEPA Region I
Remedial Project Manager
JFK Federal Building
Boston, Mass. 02203

RE: Comments on the Draft Explanation of Significant Differences, Sites 1 and 3,
NAS Brunswick

Dear Bob:

The Department has the following comments on the Explanation of Significant Differences, Sites 1 and 3, Naval Air Station Brunswick.

1. Page 18, Maine Solid Waste Regulations, MEDEP, Chapters 401-404: The Department's January 25, 1993 letter to Mr. James Shafer, was a response to a telephone inquiry from Mr. Shafer concerning whether a license was required to dispose of asbestos from Sites 5 and 6 at Sites 1 and 3. In this letter, the Department did not notify the Navy that the Maine Solid Waste Regulations were not applicable to Sites 1 and 3. The letter stated that the Director of the Division of Solid Waste Facility Licensing did not believe a license for asbestos disposal at Sites 1 and 3 was required because the disposal is part of a remedial activity. Asbestos is listed as a "Special Waste" in Maine, not a hazardous waste.

2. Page 18, fourth paragraph: As we discussed on the telephone, the Department does not support EPA's statements that the State of Maine Solid Waste Regulations, Chapters 401-404, are not appropriate at Sites 1 and 3.

The Department does not consider RCRA Subtitle C cap regulations to be as protective as Maine's Solid Waste Management Regulations (SWMR) for the following reasons:

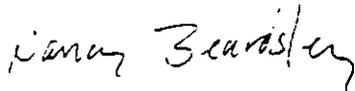
Maine's SWMR are more protective for final cover than RCRA Subtitle C because SWMR address the protection of the cap from frost.

Maine's SWMR require a minimum of 30 years of long-term site monitoring, or longer, if required by the Board of Environmental Protection. RCRA Subtitle C requires a maximum of 30 years of monitoring.

A RCRA Subtitle C cap does not provide equal or greater protectiveness than the requirements set forth in the Maine SWMR. Maine SWMR are appropriate. Maine's SWMR Chapters 401-404 should be an ARAR.

Please call me at 207-287-2651, if you have any questions or comments.

Sincerely,



Nancy Beardsley
Project Manager, Federal Facilities Unit
Office of the Commissioner

cc:Jim Caruthers, NAS Brunswick
Carolyn Lepage, R.G. Gerber Inc.
Bob McGirr, ABB ES
Rene Bernier, Topsham
Sam Butcher, Harpswell
Susan Weddle, Brunswick
Brunswick Topsham Water District
Mark Hyland, DEP
Marianne Hubert, DEP
Troy Smith, DEP

Response to State Comments Dated December 20, 1993

(Comments are typed as they appear in original comment letter)

1. **Comment** - Page 18, Maine Solid Waste Regulations, MEDEP, Chapters 401-404: The Department's January 25, 1993 letter to Mr. James Shafer, was a response to a telephone inquiry from Mr. Shafer concerning whether a license was required to dispose of asbestos from Sites 5 and 6 at Sites 1 and 3. In this letter, the Department did not notify the Navy that the Maine Solid Waste Regulations were not applicable to Sites 1 and 3. The letter stated that the Director of the Division of Solid Waste Facility Licensing did not believe a license for asbestos disposal at Sites 1 and 3 was required because the disposal is part of a remedial activity. Asbestos is listed as a "Special Waste" in Maine, not a hazardous waste.

Response: Instead of listing Chapter 401-404 of the Maine Solid Waste Management Regulations (MSWMR), this section has been revised to reflect only Chapter 400 and 401 which covers new landfill disposal facilities or alterations to existing solid waste disposal sites.

2. **Comment** - Page 18, fourth paragraph: As discussed on the telephone, the Department does not support EPA's statements that the State of Maine Solid Waste Regulations, Chapters 401-404, are not appropriate at Sites 1 and 3.

The Department does not consider RCRA Subtitle C cap regulations to be as protective as Maine's Solid Waste Management Regulations (SWMR) for the following reasons"

Maine's SWMR are more protective for final cover than RCRA Subtitle C because SWMR address the protection of cap from frost.

Maine's SWMR require a minimum of 30 years of long-term site monitoring, or longer, if required by the Board of Environmental Protection. RCRA Subtitle C requires a maximum of 30 years of monitoring.

Response: As stated in the previous comment, the scope of this section has been narrowed to MSWMR Chapters 400 and 401. The reasons for the determination that MSWMR regarding expansions are not appropriate at Sites 1 and 3 are discussed in section C of the ESD.

In regard to frost protection, you have referred to the cover requirements MSWMR §401.7(C)(4)(a). The cover requirements §401.7(C) have been included as an ARAR in the Sites 1 and 3 Record of Decision, dated June 1992 (Table D-3, p. D-8). The requirements of §401.7(C) remain an ARAR notwithstanding the new action.

In regard to long-term monitoring, the EPA considers the federal and state requirements to be equally protective. You indicate in your letter that MSWMR require a minimum of 30 years of site monitoring, or longer, if required by the Board of Environmental Protection. Federal requirements at 40 CFR §264.117(a)(1) require monitoring for a period of 30 years after completion of closure. 40 CFR §264.117(a)(2)(ii) provides that the Regional Administrator may extend this period if he/she finds that it is necessary to protect human health and the environment.

APPENDIX C
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION LETTER OF
CONCURRENCE



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN R. MCKERNAN, JR.
GOVERNORDEAN C. MARRIOTT
COMMISSIONERDEBRAH RICHARD
DEPUTY COMMISSIONER

September 16, 1994

W.A. Waters
 Captain, CEC, U.S. Navy
 Commanding Officer
 Department of the Navy, Northern Division
 Naval Facilities Engineering Command
 Building 77-L
 Philadelphia Naval Shipyard
 Philadelphia, PA 10112-5094

RE: Naval Air Station Brunswick Superfund Site, Brunswick,
 Maine

Dear Captain Waters:

The Maine Department of Environmental Protection (MEDEP) has reviewed the Navy's May 1994 Explanation Of Significant Differences (ESD) At Sites 1 and 3 Naval Air Station, Brunswick.

Under Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, if the lead agency determines that the remedial action at a Site differs significantly from the Record of Decision (ROD) for the Site, the lead agency shall publish an explanation of the significant differences between the remedial action being undertaken and the remedial action set forth in the ROD and the reasons such changes are being made.

The 1992 ROD for Sites 1 and 3 at NASB requires that the selected remedy combine both containment of waste and recovery of contaminated groundwater to obtain a comprehensive approach for site remediation. In summary, the selected remedy included; the construction of a slurry wall around the waste, placement of a low-permeability cap over the landfill area extending over the slurry wall, the installation of groundwater extraction wells, and the construction of a treatment plant to treat groundwater extracted from within the waste.

By this ESD, the Navy, as lead agency, with concurrence from EPA and MEDEP, is including the movement of material from Sites 5, 6, and 8 at NASB to Sites 1 and 3 in the remedial action for Sites 1 and 3. Sites 5, 6, and 8 are additional sites at NASB undergoing remediation as part of the CERCLA

AUGUSTA
 STATE HOUSE STATION 17
 AUGUSTA, MAINE 04333-0017
 (207) 287-7688 FAX: (207) 287-7826
 OFFICE LOCATED AT: RAY BUILDING, HOSPITAL STREET

PORTLAND
 312 CANCO ROAD
 PORTLAND, ME 04103
 (207) 879-6900 FAX: (207) 879-6303

BANGOR
 105 HOGAN ROAD
 BANGOR, ME 04401
 (207) 941-4570 FAX: (207) 941-4584

PRESQUE ISLE
 1225 CENTRAL DRIVE, SKYWAY PARK
 PRESQUE ISLE, ME 04769
 (207) 784-0477 FAX: (207) 784-1907

process. Site 5 contains asbestos materials, Site 6 contains asbestos materials and construction debris, Site 8 contains PAH contaminated soils and some construction debris. The material excavated from Sites 5, 6, and 8 will be used as necessary subgrade material in the construction of the cap at Sites 1 and 3.

Since the June 1992 ROD for Sites 1 and 3 did not include the use of material from Sites 5, 6, and 8 as subgrade fill for the Sites 1 and 3 cap, the Navy, as lead agency, is issuing this ESD. The MEDEP concurs with this ESD.

Sincerely,



Deborah N. Garrett
Acting Commissioner

pc: Captain D.J. Nelson
Elizabeth Walter, ABB-ES
Robert Lim, USEPA Region 1
Mark Hyland, MEDEP

APPENDIX D
ADMINISTRATIVE RECORD INDEX AND GUIDANCE DOCUMENTS

NAVAL AIR STATION BRUNSWICK ADMINISTRATIVE RECORD INDEX

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SECTION 1: PRELIMINARY ASSESSMENTS

Volume 1: *Initial Assessment Study of Naval Air Station Brunswick, Maine*, prepared by Roy F. Weston, Inc.; June 1983 (Sites 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10).

Correspondence:

1. USEPA Notification of Hazardous Waste Site Forms identifying three landfills, and one asbestos disposal area at Naval Air Station Brunswick; May 22, 1981.

SECTION 2: SITE INSPECTIONS

Volume 1: *Field Site Inspection Report for the U.S. Naval Air Station, Brunswick, Maine*, prepared by NUS Corporation; August 1984 (Sites 1, 2, and 3).

Pollution Abatement Confirmation Study, Step 1A - Verification, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; June 1985 (Sites 1,2,3,4,7,8,9).

Correspondence:

1. Memo to Don Smith, NUS Corporation, from Colin Young, NUS Corporation, regarding the site inspection at the U.S. Naval Air Station; September 22, 1983.
2. Memo to Robert Kowalczyk, Naval Facilities Engineering Command, Northern Division, from William Fisher, E.C. Jordan Co. [ABB Environmental Services, Inc.], regarding the schedule of on-site exploration and sampling activities during the Pollution Abatement Confirmation Study; October 30, 1984.
3. Memo of conversation between Robert Kowalczyk, Naval Facilities Engineering Command, Northern Division, and William Fisher, E.C. Jordan Co. [ABB Environmental Services, Inc.], regarding the preliminary data from the Confirmation Study at Brunswick and the status of fieldwork; December 11, 1984.
4. Memo of conversation between Robert Kowalczyk, Naval Facilities Engineering Command, Northern Division, and William Fisher, E.C. Jordan Co. [ABB Environmental Services, Inc.], regarding the preliminary results of the NACIP Study at Brunswick and the expected completion of the sampling; January 3, 1985.
5. Memo of conversation between Robert Kowalczyk, Naval Facilities Engineering Command, Northern Division, and William Fisher, E.C. Jordan Co. [ABB Environmental Services, Inc.], regarding the results of the NACIP Study at Brunswick and the expected submittal of the report; January 15, 1985.

October 25, 1993

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6. Letter to William Fisher, E.C. Jordan Co. [ABB Environmental Services, Inc.], from A. Rhoads, Department of the Navy, Northern Division Environmental Protection Section, regarding comments on the Draft Confirmation Study Verification Step report; April 15, 1985.
7. Meeting minutes of May 22, 1984[5], meeting among Department of the Navy, Northern Division, NAS Brunswick, and E.C. Jordan Co. [ABB Environmental Services, Inc.], regarding the NACIP Confirmation Study Verification Phase report; May 24, 1985.
8. Letter to William Fisher, E.C. Jordan Co. [ABB Environmental Services, Inc.], from A. Rhoads, Department of the Navy, Northern Division Environmental Protection Section, regarding comments on the revised Confirmation Study Verification Step Report; August 2, 1985.
9. Letter to Robert Jackson, U.S. Environmental Protection Agency (USEPA), from L.K. Jones, Naval Air Station, Brunswick, regarding transmittal of the June 1985 [Pollution Abatement Confirmation Study, Step 1A - Verification] Report; December 3, 1985.
10. Letter to L.K. Jones, Naval Air Station, Brunswick, from Robert Jackson, USEPA, regarding comments on the [June 1985] Pollution Abatement Confirmation Study, Step 1A - Verification Report; January 13, 1986.
11. Letter to L.K. Jones, Naval Air Station, Brunswick, from Anthony Leavitt, Maine Department of Environmental Protection (DEP), regarding comments on the [June 1985] Pollution Abatement Confirmation Study, Step 1A - Verification Report; January 13, 1986.
12. Letter to Jim Shafer, Department of the Navy, Northern Division, from Nancy Beardsley, MEDEP, regarding MEDEP's comments on future planned field activities and the TRC meeting discussion for Site 9; April 1, 1993.

SECTION 3: REMOVAL ACTIONS

NOT APPLICABLE TO SITES 1 AND 3

SECTION 4: REMEDIAL INVESTIGATIONS

Volume 1: *Remedial Investigation/Feasibility Study Work Plan*, formerly Draft Pollution Abatement Confirmation Study Work Plan - Step 1 prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; April 1988 (Sites 1,2,3,4,7,8,9).

Addendum to RI/FS Work Plan, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; July 1988 (Sites 1,2,3,4,7,8,9).

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Additional Sampling Plan, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; August 1989 (Sites 1,2,3,4,7,8,9).

Correspondence:

1. Letter to Commander L.K. Jones, Naval Air Station Brunswick, from Matthew Hoagland, USEPA, regarding comments on the September 1986 Draft Pollution Abatement Confirmation Study Work Plan - Step 1B: Characterization; November 24, 1986.
2. Letter to Matthew Hoagland, USEPA, from T.G. Sheckels, Naval Air Station Brunswick, regarding responses to USEPA comments on the September 1986 Draft Pollution Abatement Confirmation Study Work Plan - Step 1B: Characterization; March 31, 1987.
3. Letter to Commander L.K. Jones, Naval Air Station Brunswick, from David Webster, USEPA, regarding clarification as to the status of incorporating USEPA's comments into the revised report, and communication of their concerns for Site 8; April 9, 1987.
4. Letter to Charlotte Head, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration (NOAA), regarding comments on the RI/FS Workplan for Phase II field activity; April 14, 1989.
5. Letter to Charlotte Head, USEPA, from Sharon Christopherson, National Oceanic and Atmospheric Administration (NOAA), regarding responses to Navy comments on NOAA's work plan recommendations; May 8, 1987.
6. Letter to David Epps and Robert Kowalczyk, Naval Facilities Engineering Command, Northern Division, from Charlotte Head, USEPA, regarding the [Pollution Abatement Confirmation Study, Step] 1B - Characterization Work Plan meeting, and a discussion for the Superfund program; June 29, 1987.
7. Meeting summary of June 12, 1987, planning meeting at USEPA Region I offices in Boston, Massachusetts, among USEPA; U.S. Navy; E.C. Jordan Co. [ABB Environmental Services, Inc.]; Maine DEP; NOAA; Camp, Dresser & McKee; June 30, 1987.
8. Letter to Robert Kowalczyk, Naval Facilities Engineering Command, Northern Division, from Jack Hoar, Camp, Dresser & McKee, regarding meeting notes from a June 12, 1987, planning meeting at USEPA Region I offices in Boston, Massachusetts, among USEPA; U.S. Navy; E.C. Jordan Co. [ABB Environmental Services, Inc.]; Maine DEP; NOAA; Camp, Dresser & McKee; July 8, 1987.
9. Letter to Charlotte Head, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration, regarding the June 10, 1987, Trustee Notification Form; November 10, 1987.

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10. Letter to Captain E.B. Darsey, Naval Air Station Brunswick, from Merrill Hohman, USEPA, regarding comments on the [January 1988] Pollution Abatement Confirmation Study RI and Extended SI Studies, the Site Quality Assurance Plan, the Site Health and Safety Plan, and the Quality Assurance Program Plan; March 15, 1988.
11. Letter to Ronald Springfield, Naval Facilities Engineering Command, Northern Division, from Cynthia Kuhns, Maine DEP, regarding comments on the January 1988 Remedial Investigation Work Plan, and the January 1988 Quality Assurance Program Plan (see Section 10 of this index); April 7, 1988.
12. Letter to Charlotte Head, USEPA, from Gordon Beckett, U.S. Fish and Wildlife Service, regarding comments on the [April 1988] RI/FS Work Plan; May 10, 1988.
13. Letter to Charlotte Head, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration, regarding the [April 1988 Remedial Investigation/ Feasibility Study] Work Plan; May 13, 1988.
14. Letter to Captain E.B. Darsey, Naval Air Station Brunswick, from Cynthia Kuhns, Maine DEP, regarding comments on the April 1988 Remedial Investigation/ Feasibility Study Work Plan; June 6, 1988.
15. Letter to Captain E.B. Darsey, Naval Air Station Brunswick, from David Webster, USEPA, regarding comments on the April 1988 Remedial Investigation/ Feasibility Study] Work Plan; June 17, 1988.
16. Memo from M. Aucoin, Naval Air Station Brunswick, regarding laboratory analytical methods discussed in the RI/FS Work Plan; August 12, 1988.
17. Letter to Naval Facilities Engineering command, Northern Division, from Anthony Sturtzer, Naval Energy and Environmental Support Activity, regarding laboratory approval for Installation Restoration Program analyses; August 22, 1988.
18. Letter to Charlotte Head, USEPA, from T.G. Sheckels, Department of the Navy, Northern Division, regarding status and completion of the first phase of fieldwork and sampling under the RI/FS Work Plan: October 26, 1988.
19. Letter to Ronald Springfield, Naval Facilities Engineering Command, Northern Division, from Denise Messier, Maine DEP, regarding comments on the April 1989 Draft Additional Sampling Plan; May 22, 1989.
20. Letter to T.G. Sheckels, Naval Facilities Engineering Command, Northern Division, from David Webster, USEPA, regarding comments on the April 1989 Draft Additional Sampling Plan; June 9, 1989.

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21. Letter to Ronald Springfield, Naval Facilities Engineering Command, Northern Division, from Denise Messier, Maine DEP, regarding approval of the Draft Additional Sampling Plan; June 15, 1989.
22. Letter to Ronald Springfield, Naval Facilities Engineering Command, Northern Division, from Melville Dickenson, E.C. Jordan Co. [ABB Environmental Services, Inc.], regarding transmittal of the Additional Sampling Plan and some outstanding issues that needed further discussion with the regulatory agencies; August 9, 1989.
23. Letter to Ronald Springfield, Naval Facilities Engineering Command, Northern Division, from David Webster, USEPA, regarding comments on the August 1989 Draft Additional Sampling Plan; September 26, 1989.
24. Letter to Ronald Springfield, Naval Facilities Engineering Command, Northern Division, from Denise Messier, Maine DEP, regarding comments on the August 1989 Additional Sampling Plan; December 28, 1989.

Volume 2: *Post-Screening Work Plan, prepared by E.C. Jordan Co.* [ABB Environmental Services, Inc.]; July 1990 (Sites 1,2,5,6,8,9,11,12,13, Eastern Plume; Treatability Studies 8; 11).

Addendum - Post-Screening Work Plan, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; November 1990 (Sites 1,2,5,6,8,9,11,12,13,14, Eastern Plume; Treatability Studies 8; 11).

Correspondence:

1. Letter to Kenneth Marriott, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the April 1990 Draft Post-Screening Work Plan; May 1, 1990.
2. Letter to Kenneth Marriott, Department of the Navy, Northern Division, from Michael Jasinski for David Webster, USEPA, regarding the April 1990 Draft Remedial Investigation Report and the April 1990 Draft Post-Screening Work Plan; May 17, 1990.
3. Letter to Kenneth Marriott, Department of the Navy, Northern Division, from Susan Weddle, TRC community member, regarding comments on the February 1990 Draft Phase I Feasibility Study - Development and Screening of Alternatives, and the April 1990 Draft Remedial Investigation Report and the April 1990 Draft Post-Screening Work Plan; May 23, 1990.
4. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the July 1990 Post-Screening Work Plan; July 27, 1990.
5. Letter to James Shafer, Department of the Navy, Northern Division, from David Webster, USEPA, regarding comments on the July 1990 Post-Screening Work Plan; August 30, 1990.

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Volume 3: *Round I Data Package, Phase I - Remedial Investigation*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; January 1989 (Sites 1,2,3,4,7,8,9).

Correspondence:

2. Letter to Ronald Springfield, Department of the Navy, Northern Division, from David Gulick, E.C. Jordan Co. [ABB-ES] regarding the transmittal of the Round I Data Package; January 13, 1989.
3. Letter to T.G. Sheckels, Department on the Navy, Northern Division, from David Webster, USEPA, regarding comments on the Round I Data Package and recommendations on future data packages; March 13, 1989.
4. Letter to Charlotte Head, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration, regarding comments on the Rounds I and II Data Packages; March 13, 1989.

Volume 4: *Round II Data Package, Phase I - Remedial Investigation*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; March 1989 (Sites 1,2,3,4,7,8,9).

Round III Data Package, Phase I - Remedial Investigation, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; July 1989 (Sites 1,2,3,4,7,8,9).

Correspondence:

1. Letter to Ronald Springfield, Northern Division, Naval Facilities Engineering Command, from David Gulick, E.C. Jordan, Co. [ABB-ES], regarding transmittal of and comments on the Round II Data Package; March 10, 1989.
2. Letter to Ronald Springfield, Northern Division, Naval Facilities Engineering Command, from David Gulick, E.C. Jordan, Co. [ABB-ES], regarding transmittal of and comments on the Round III Data Package; July 14, 1989.
3. Letter to Jack Jojokian, USEPA, from John Walker, Camp, Dresser & McKee Federal Programs Corporation, regarding comments on the Round III Data Package; August 31, 1989.
4. Letter to Ronald Springfield, Northern Division, Naval Facilities Engineering Command, regarding comments on the Round III Data Package; October 4, 1989.

Volume 5: *Remedial Investigation Feasibility Study - Round IV Data Package*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; January 1990 (Sites 1,2,3,4,7,8,9,11,13).

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Correspondence:

1. Letter to Meghan Cruise, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration, regarding comments on the Round 4 [IV] Data Package; August 28, 1989.
2. Letter to Kenneth Marriott, Northern Division, Naval Facilities Engineering Command, regarding comments on the Round IV Data Package; March 5, 1990.

Volume 6: *Draft Final Remedial Investigation Report Volume 1*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; August 1990 (Sites 1,3; 2; 4,11,13; 7; 8; 9).

Correspondence:

1. Letter to Kenneth Marriott, Department of the Navy, Northern Division, from Susan Weddle, TRC community member, regarding comments on the April 1990 Draft Remedial Investigation Report; May 15, 1990.
2. Letter to Kenneth Marriott, Department of the Navy, Northern Division, from Michael Jasinski for David Webster, USEPA, regarding comments on the April 1990 Draft Remedial Investigation Report and the April 1990 Draft Post-Screening Work Plan; May 17, 1990.
3. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the August 1990 Draft Final Remedial Investigation Report; October 10, 1990.
4. Letter to James Shafer, Department of the Navy, Northern Division, from Mary Jane O'Donnell, USEPA, regarding comments on the August 1990 Draft Final Remedial Investigation Report; October 17, 1990.

Volume 7: *Draft Final Remedial Investigation Report Volume 2: Appendices A-J*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; August 1990 (Sites 1,3; 2; 4,11,13; 7; 8; 9).

Volume 8: *Draft Final Remedial Investigation Report Volume 3: Appendices K-P*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; August 1990 (Sites 1,3; 2; 4,11,13; 7; 8; 9).

Volume 9: *Draft Final Remedial Investigation Report Volume 4: Appendix Q - Risk Assessment*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; August 1990 (Sites 1,3; 2; 4,11,13; 7; 8; 9).

Correspondence:

October 25, 1993

NAVAL AIR STATION BRUNSWICK ADMINISTRATIVE RECORD INDEX

1. Letter to Ronald Springfield, Naval Facilities Engineering Command, Northern Division, from Charlotte Head for David Webster, USEPA, regarding the inclusion of the [Step] 1A Verification Study data in the risk assessment for the air station; September 15, 1988.
2. Letter to T.G. Sheckels, Naval Facilities Engineering Command, Northern Division, from David Webster, USEPA, regarding review comments on the Phase I Feasibility Study Preliminary Development of Alternatives, and the Preliminary Risk Assessment; May 5, 1989.
3. Letter to Kenneth Marriott, Department of the Navy, Northern Division, from Ted Wolfe for Denise Messier, Maine DEP, regarding comments on the February 1989 Preliminary Risk Assessment; February 8, 1990.
4. Letter to Kenneth Marriott, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the April 1990 Draft Remedial Investigation Report; May 17, 1990.

Volume 10: *Remedial Investigation Feasibility Study Round V Data Package*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; March 1991 (Sites 5,6,8,9,11,12,14, Eastern Plume; Treatability Study for Sites 8,11).

Volume 11: *Draft Final Supplemental RI Report Volume 1*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; August 1991 (Sites 5,6,8,9,11,12, Eastern Plume).

Correspondence:

1. Letter to Meghan Cassidy, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration, regarding comments on the [April 1991] Draft Focused Feasibility Study for Sites 1 and 3; the [April 1991] Draft Supplemental Remedial Investigation; and the [April 1991] Draft Supplemental Feasibility Study for Sites 5, 6, and 12; May 1, 1991.
2. Letter to Captain H.M. Wilson, Naval Air Station Brunswick, from Samuel Butcher, regarding comments on the [April 1991] Draft Supplemental Remedial Investigation Report; May 1, 1991.
3. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the [April 1991] Draft Supplemental Remedial Investigation Report; May 23, 1991.
4. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the [April 1991] Draft Supplemental Remedial Investigation Report; May 30, 1991.

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5. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding additional comments on the April 1991 Draft Supplemental Remedial Investigation Report; June 19, 1991.
6. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the [August 1991] Draft Final Supplemental Remedial Investigation Report; September 4, 1991.
7. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the [August 1991] Draft Final Supplemental Remedial Investigation Report; September 10, 1991.

Volume 12: *Draft Final Supplemental RI Report Volume 2: Appendices A-J*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; August 1991 (Sites 5,6,8,9,11,12, Eastern Plume).

Volume 13: *Draft Final Supplemental RI Report Volume 3: Appendices K-Q*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; August 1991 (Sites 5,6,8,9,11,12, Eastern Plume).

SECTION 5: FEASIBILITY STUDIES

Volume 1: *Draft Final Phase I Feasibility Study Development and Screening of Alternatives*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; August 1990 (Sites 1,3; 2; 4,11,13; 7; 8; 9).

Correspondence:

1. Letter to T.G. Sheckels, Department of the Navy, Northern Division, from David Webster, USEPA, regarding comments on the February 1989 Phase I Feasibility Study: Preliminary Development of Alternatives, and February 1989 Preliminary Risk Assessment reports; May 5, 1989.
2. Letter to Alan Prysunka, Maine DEP, from T.G. Sheckels, Department of the Navy, Northern Division, regarding Applicable or Relevant and Appropriate Requirements (ARARs) for Remedial Investigation/ Feasibility Study (RI/FS); March 6, 1990.
3. Letter to Kenneth Marriott, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the February 1990 Draft Phase I Feasibility Study Development and Screening of Alternatives; April 17, 1990.
4. Letter to Kenneth Marriott, Department of the Navy, Northern Division, from David Webster, USEPA, regarding comments on the February 1990 Draft Phase I Feasibility Study Development and Screening of Alternatives; April 23, 1990.

October 25, 1993

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5. Letter to Kenneth Marriott, Department of the Navy, Northern Division, from Susan Weddle, TRC community member, regarding comments on the February 1990 Draft Phase I Feasibility Study Development and Screening of Alternatives, and the April 1990 Draft Post-Screening Work Plan; May 23, 1990.
6. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on Draft Final Phase I Feasibility Study Development and Screening of Alternatives; September 28, 1990.
7. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the August 1990 Draft Final Phase I Feasibility Study Development and Screening of Alternatives; October 16, 1990.
9. Letter to Meghan Cassidy, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration, regarding comments on the [April 1991] Draft Focused Feasibility Study for Sites 1 and 3; the [April 1991] Draft Supplemental Remedial Investigation; and the [April 1991] Draft Supplemental Feasibility Study for Sites 5, 6, and 12; May 1, 1991.

Volume 2: *Focused Feasibility Study*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; October 1991 (Sites 1 & 3)

Numerical Modeling Report, prepared by ABB Environmental Services, Inc.; January 1993 (Sites 1 & 3; Eastern Plume).

Correspondence:

1. Letter to Captain H.M. Wilson, Naval Air Station Brunswick, from Samuel Butcher, regarding comments on the [April 1991] Draft Focused Feasibility Study Report; May 1, 1991.
2. Letter to Meghan Cassidy, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration, regarding comments on the [April 1991] Draft Focused Feasibility Study for Sites 1 and 3; the [April 1991] Draft Supplemental Remedial Investigation; and the Draft Supplemental Feasibility Study for Sites 5, 6, and 12; May 1, 1991.
3. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the [April 1991] Draft Focused Feasibility Study Report; May 9, 1991.
4. Letter to Meghan Cassidy, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration, regarding additional comments on the [April 1991] Draft Focused Feasibility Study for Sites 1 and 3; May 10, 1991.

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5. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding additional comments on the [April 1991] Draft Focused Feasibility Study Report; May 13, 1991.
6. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding state requirements for off-gas treatment for the [April 1991] Draft Focused Feasibility Study Report; May 21, 1991.
7. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the July 1991 Draft Final Focused Feasibility Study Report; August 14, 1991.
8. Letter to Merrill S. Hohman, USEPA, from Capt. Thomas Dames, Department of the Navy, Northern Division, regarding dispute resolution pertaining to the Draft Final Focused Feasibility Study; August 14, 1991.
9. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the August 1991 Draft Final Focused Feasibility Study Report; August 15, 1991.
10. Letter to Ralph Lombardo, Department of the Navy, Northern Division, from Ted Wolfe, MEDEP, regarding dispute resolution, August 28, 1991.
11. Memorandum of agreement to resolve a dispute initiated under the Federal Facility Agreement for the Focused Feasibility Study for Sites 1 and 3; September 1991.
12. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the Focused Feasibility Study for Sites 1 and 3, September 16, 1991.
13. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the October 1991 [Draft] Numerical Modeling Work Plan; November 22, 1991.
14. Letter to James Shafer, Department of the Navy, Northern Division, from Mark Hyland, Maine DEP, regarding comments on the [October 1991] Draft Numerical Modeling Work Plan; December 5, 1991.
15. Letter to James Shafer, Department of the Navy, Northern Division, from Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, regarding comments on the [October 1991 Draft] Numerical Modeling Work Plan; January 13, 1992.
16. Letter to James Shafer, Department of the Navy, Northern Division, from Mark Hyland, Maine DEP, regarding comments on the Draft Numerical Modeling Report; December 4, 1992.

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Volume 3: *Feasibility Study Volume 1*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; March 1992 (Sites 2; 4,11,13; 5,6; 7; 9; 12; 14; Eastern Plume).

Correspondence:

1. Letter to Meghan Cassidy, USEPA, from John Lindsay, National Oceanic and Atmospheric Administration, regarding comments on the [July 1991] Draft Feasibility Study Report; August 16, 1991.
2. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the July 1991 Draft Feasibility Study Report; September 20, 1991.
3. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the July 1991 Draft Feasibility Study Report; September 23, 1991.
4. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the November 1991 Draft Final Feasibility Study; December 26, 1991.
5. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the November 1991 Draft Final Feasibility Study Report; January 2, 1992.
6. Comments from BACSE on the Feasibility Study Report, February 18, 1992.

Volume 4: *Feasibility Study Volume 2: Appendices A - O*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; March 1992 (Sites 2; 4,11,13; 5,6; 7; 9; 12; 14; Eastern Plume).

Volume 5: *Focused Feasibility Study*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; April 1992 (Site 8)

Correspondence:

1. Memo to Mark Hyland, MEDEP, from Dick Behr, Division of Technical Services, regarding the Focused Feasibility Study (Site 8).
2. Letter to Captain H.M. Wilson, Naval Air Station Brunswick, from Samuel Butcher, regarding comments on the [May 1991] Draft Focused Feasibility Study report; May 28, 1991.
3. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the May 1991 Draft Focused Feasibility Study report; June 17, 1991.

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4. Letter to Meghan Cassidy, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration, regarding comments on the [May 1991] Draft Focused Feasibility Study for Site 8; June 5, 1991.
5. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the May 1991 Draft Focused Feasibility Study Site 8 report; June 27, 1991.
6. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the August 1991 Draft Final Focused Feasibility Study Site 8 report; August 11, 1991.
7. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the August 1991 Draft Final Feasibility Study Site 8 report; September 9, 1991.
8. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding the re-calculation of risk estimates for Site 8; February 19, 1992.

SECTION 6: PROPOSED PLANS AND PUBLIC HEARING TRANSCRIPTS

Volume 1: *Proposed Plan*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; December 1991 (Sites 1 and 3).

Transcript of the Public Hearing for Sites 1 and 3 and the Eastern Plume, prepared by Downing & Peters Reporting Associates; December 12, 1991 (Sites 1 and 3; Eastern Plume).

Correspondence:

3. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the August 1991 Draft Proposed Plan - Sites 1 and 3; September 23, 1991.
4. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the August 1991 Draft Proposed Plan - Sites 1 and 3; September 26, 1991.
7. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the October 1991 Draft Proposed Plan - Sites 1 and 3; November 6, 1991.
8. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the October 1991 Draft Proposed Plan - Sites 1 and 3; November 12, 1991.

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11. Letter to James Shafer, Department of the Navy, Northern Division, from Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, regarding comments on the December 1991 Proposed Plans, Sites 1 and 3 and Eastern Plume; January 13, 1992.
12. Letter to James Shafer, Department of the Navy, Northern Division, from Susan C. Weddle, Brunswick community representative, regarding public comments on the December 1991 Proposed Plan Eastern Plume, the December 1991 Proposed Plan Sites 1 and 3; January 13, 1992.
13. Letter to James Shafer, Department of the Navy, Northern Division, from Edmund E. Benedikt, Friends of Merrymeeting Bay, regarding comments on the December 1991 Proposed Plans for Sites 1 and 3 and the Eastern Plume; January 3, 1992.

Volume 2: *Final Proposed Plan* prepared by ABB Environmental Services, Inc.; September 1992 (Site 8).

Transcript of the Public Meeting [Hearing] for Proposed Plan, Site 8: Perimeter Road Disposal Site, prepared by Mason & Lockhart; October 15, 1992 (Site 8).

Revised Proposed Plan for Site 8 prepared by ABB Environmental Services, Inc.; March 1993.

Proposed Plan prepared by ABB Environmental Services, Inc.; March 1993 (Sites 5 and 6).

Technical Memorandum prepared by ABB Environmental Services, Inc.; March 1993 (Sites 5 and 6).

Technical Memorandum, prepared by ABB Environmental Services, Inc., March 1993 (Site 8).

Correspondence:

1. Letter to Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, from Carolyn A. Lepage and Andrews L. Tolman, Robert G. Gerber, Inc., regarding comments on the Draft Proposed Plan for Site 8; May 28, 1992.
2. Memo to Mark Hyland, MEDEP, from Marianne Hubert, Technical Services, regarding the Proposed Plan for Site 8, June 18, 1992.
3. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the May 1992 Draft Proposed Plan for Site 8; June 29, 1992.
4. Letter to James Shafer, Department of the Navy, Northern Division, from Mark Hyland, MEDEP, regarding the Proposed Plan for Site 8, June 30, 1992.

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5. Letter to Loukie Lofchie, BACSE, from Carolyn LePage, Robert G. Gerber, Inc., regarding comments on the Proposed Plan for Site 8, August 27, 1992.
6. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the August 1992 Proposed Plan for Site 8; August 31, 1992.
7. Letter to James Shafer, Department of the Navy, Northern Division, from Mark Hyland, Maine DEP, regarding comments on the August 1992 Proposed Plan; September 10, 1992.
8. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding comments on the February 1993 Revised Draft Proposed Plan; August 31, 1992.
9. Letter to Loukie Lofchie, BACSE, from Carolyn LePage, Robert G. Gerber, Inc., regarding comments on the Proposed Plan for Site 8, October 28, 1992.
10. Letter to James Shafer, Department of the Navy, Northern Division, from Mark Hyland, MEDEP, regarding the Draft Proposed Plan for Sites 5 and 6, November 6, 1992.
11. Letter to Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, from Carolyn A. Lepage and Andrews L. Tolman, Robert G. Gerber, Inc., regarding comments on the Draft Proposed Plan for Sites 5 and 6; November 6, 1992.
12. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding the Draft Proposed Plan for Sites 5 and 6, November 10, 1992.
13. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding the Draft Final Proposed Plan for Sites 5 and 6, December 18, 1992.
14. Letter to James Shafer, Department of the Navy, Northern Division, from Mark Hyland, MEDEP, regarding the Proposed Plan for Sites 5 and 6, December 22, 1992.
15. Letter to James Shafer, Department of the Navy, Northern Division, from Mark Hyland, MEDEP, regarding the Proposed Plan for Sites 5 and 6, January 25, 1993.
16. Letter to Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, from Carolyn A. Lepage and Andrews L. Tolman, Robert G. Gerber, Inc., regarding comments on the Draft Proposed Plan for Sites 5 and 6; January 27, 1993.

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17. Letter to James Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding the Technical Memorandum, January 29, 1993.
18. Letter to Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, from Carolyn A. Lepage, Robert G. Gerber, Inc., regarding comments on the Draft Technical Memorandum for Sites 5 and 6; February 2, 1993.
19. Letter to Jim Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding USEPA's comments on the Revised Draft Proposed Plan (February 1993) and Draft Technical Memorandum for Site 8; February 8, 1993.
20. Letter to Jim Shafer, Department of the Navy, Northern Division, from Mark Hyland, MEDEP, regarding MEDEP's comments on the Draft Revised Proposed Plan and Draft Technical Memorandum for Site 8; February 17, 1993.
21. Letter to Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, from Carolyn A. Lepage, Robert G. Gerber, Inc., regarding comments on the Draft Revised Proposed Plan and Draft Technical Memorandum for Site 8; February 17, 1993.
22. Letter to Jim Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding USEPA's comments on the Draft Final Proposed Plan (February 1993) and Draft Final Technical Memorandum for Sites 5 and 6; February 24, 1992[3].
23. Letter to Jim Shafer, Department of the Navy, Northern Division, from Mark Hyland, MEDEP, regarding MEDEP's comments on the Draft Final Proposed Plan and Draft Final Technical Memorandum for Sites 5 and 6; March 4, 1993.
24. Letter to Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, from Carolyn A. Lepage and Andrews L. Tolman, Robert G. Gerber, Inc., regarding comments on the Draft Proposed Plan and Draft Final Technical Memorandum for Sites 5 and 6; March 5, 1993.
25. Letter to Jim Shafer, Department of the Navy, Northern Division, from Nancy Beardsley, MEDEP, regarding MEDEP's comments on the Proposed Plan for Sites 5 and 6; April 1, 1993.

SECTION 7: RECORDS OF DECISION

- Volume 1: *Record of Decision for a Remedial Action* prepared by ABB Environmental Services, Inc.; June 1992 (Sites 1 and 3)

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Correspondence:

1. Letter to Meghan Cassidy, USEPA, from Gordon Beckett, Fish and Wildlife Service, regarding the Draft Records of Decision for Sites 1 and 3 and the Eastern Plume, March 25, 1992.
2. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding comments on the March 1992 Draft Record of Decision for Sites 1 and 3 and March 1992 Draft Interim Record of Decision for the: Eastern Plume; April 2, 1992.
4. Letter to James Shafer, Department of the Navy, Northern Division, from Mary Jane O'Donnell, USEPA, regarding USEPA's and U.S. Fish and Wildlife Services' comments on the [March 1992] Draft Record of Decision for the: Sites 1 and 3; April 6, 1992.
6. Letter to Thomas Dames, Department of the Navy, Northern Division, from Dean Marriott, Maine DEP, regarding Maine DEP's concurrence with the interim remedial action presented in the June 1992 Draft Record of Decision for Sites 1 and 3; June 4, 1992.

Volume 2: *Record of Decision for a Remedial Action* prepared by ABB Environmental Services, Inc.; August 1993 (Sites 5 and 6).

Record of Decision for a Remedial Action prepared by ABB Environmental Services, Inc.; August 1993 (Site 8).

Correspondence:

1. Letter to Jim Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding USEPA's comments on the Draft Record of Decision for Site 8; May 25, 1993.
2. Letter to Jim Shafer, Department of the Navy, Northern Division, from Mark Hyland, MEDEP, regarding MEDEP's comments on the Draft Record of Decision for Site 8; May 26, 1993.
3. Letter to Jim Shafer, Department of the Navy, Northern Division, from Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, enclosing a letter dated May 25, 1993 to Loukie Lofchie, from Carolyn A. Lepage and Andrews L. Tolman, Robert G. Gerber, Inc., regarding comments on the Draft Record of Decision for Site 8; May 26, 1993.
4. Letter to Jim Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding USEPA's comments on the Draft Record of Decision for Sites 5 and 6; June 24, 1993.

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5. Letter to Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, from Carolyn A. Lepage, Robert G. Gerber, Inc., regarding comments on the Draft Record of Decision for Sites 5 and 6; June 24, 1993.
6. Letter to Jim Shafer, Department of the Navy, Northern Division, from Nancy Beardsley, MEDEP, regarding MEDEP's comments on the Draft Final Record of Decision for Sites 5 and 6; June 25, 1993.
7. Letter to Jim Shafer, Department of the Navy, Northern Division, from Nancy Beardsley, MEDEP, regarding MEDEP's comments on the Draft Final Record of Decision for Site 8; June 25, 1993.
8. Letter to Loukie Lofchie, Brunswick Area Citizens for a Safe Environment, from Carolyn A. Lepage, Robert G. Gerber, Inc., regarding comments on the Draft Final Record of Decision for Site 8; June 25, 1993.
9. Letter to Jim Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding USEPA's comments on the Draft Final Record of Decision for Site 8; June 29, 1993.
10. Letter to Jim Shafer, Department of the Navy, Northern Division, from Meghan Cassidy, USEPA, regarding USEPA's comments on the Draft Final Record of Decision for Sites 5 and 6; July 11, 1993.
11. Facsimile to Bob McGirr, ABB Environmental Services, Inc., from Meghan Cassidy, USEPA, regarding additional USEPA comments on the Draft Final Record of Decision for Site 8; August 3, 1993.
12. Facsimile to Kathy Kern, ABB Environmental Services, Inc., from Meghan Cassidy, USEPA, regarding additional USEPA comments on the Draft Final Record of Decision for Sites 5 and 6; August 13, 1993.
13. Letter to Jim Shafer, Department of the Navy, Northern Division, from Nancy Beardsley, MEDEP, regarding MEDEP's comments on the Draft Final Record of Decision for Sites 5 and 6; August 16, 1993.

SECTION 8: POST-RECORD OF DECISION

- Volume 1: *Remedial Design Summary Report*, prepared by ABB Environmental Services, Inc.; May 1993 (Sites 1, 3, 5, 6, 8, and the Eastern Plume).

SECTION 9: COMMUNITY RELATIONS

- Volume 1: *Community Relations Plan - for NASB NPL Sites* prepared jointly by Public Affairs Office, Navy Northern Division, and E.C Jordan Co. [ABB Environmental Services, Inc.]; September 1988

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Correspondence:

1. Public notice for the Remedial Investigation and Feasibility Study schedule for Brunswick Naval Air Station Superfund Site published in the Portland Press Herald; February 24, 1988.
2. Memo to Commanding Officer, Naval Air Station Brunswick, from T.F. Rooney, Department of the Navy, Northern Division, regarding community relations interviews, and comments on the Draft Community Relations Plan; July 14, 1988.
3. Press release regarding the USEPA and U.S. Navy announcing the signing of the Federal Facility Agreement for the Brunswick Naval Air Station; October 6, 1989.
4. Letter to Commander Geoffrey Cullison, Naval Air Station Brunswick, from Ted Wolfe, Maine DEP, regarding analytical results from water samples collected from a Coombs Road residence; December 27, 1989.
5. Letter to Ken Marriott, Naval Facilities Engineering Command, Northern Division, from Joshua Katz, Brunswick Area Citizens for a Safe Environment, regarding Freedom of Information Act request; March 6, 1990.
6. Press release regarding an extension of application notification deadline for Technical Assistance Grant Application to be filed; March 26, 1990.
7. Letter to [Joshua] Katz, from T.J. Purul, Naval Air Station Brunswick, regarding the availability of information requested under the Freedom of Information Act; April 6, 1990.
8. Letter to Kenneth Marriott, Naval Facilities Engineering Command, from Joshua Katz, Brunswick Area Citizens for a Safe Environment, regarding the Freedom of Information Act request; a March 22, 1990 public information meeting; and the preliminary response to an April 8, 1990 site visit: April 12, 1990.
9. Letter to file from Geoffrey Cullison, Naval Air Station Brunswick, regarding Site 8 and off-site influences; April 23, 1990.
10. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding data from the sampling at Consolidated Auto, and the revised May 30, 1990 Maximum Exposure Guidelines; June 22, 1990.
11. Fact sheet for Naval Air Station Brunswick regarding question and answers about National Priorities List Sites; August 15, 1990.
12. Press release announcing the public comment period for the Federal Facility Agreement for Brunswick Naval Air Station; November 2, 1990.
13. Press release regarding Brunswick citizens receiving a \$50,000 federal grant for a Superfund advisor; January 3, 1991.

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14. Fact sheet regarding the Sites 1 and 3 Proposed Plan, and the Eastern Plume Proposed Plan; December 1991.
15. Public notice announcing the public meeting/hearing and public comment period for the Sites 1 and 3 Proposed Plan, and the Eastern Plume Proposed Plan; December 1991.
16. Press release regarding the signing of the Record of Decision for Sites 1 and 3 cleanup at Naval Air Station Brunswick; June 1992.
17. Public notice announcing the public meeting/hearing and public comment period for cleanup of the Perimeter Road Disposal Area [Site 8] at Naval Air Station Brunswick; October 1992.
18. Fact sheet regarding the Site 8 Proposed Plan; October 1992.
19. Public notice announcing the public meeting/hearing and public comment period for removal of Building 95 pesticide shop and surrounding soils; November 1992.
20. Fact sheet regarding the proposed removal actions at Building 95; November 1992.
21. Public notice announcing the public meeting/hearing and public comment period for the revised Proposed Plan for Site 8 that now includes excavation; March 1993.
22. Public notice announcing the public meeting/hearing and public comment period for the Sites 5 and 6 Proposed Plan; March 1993.
23. Fact sheet regarding the Proposed Plan for Sites 5, the Orion Street Asbestos Disposal Site, and Site 6, the Sandy Road Rubble and Asbestos Disposal Site; March 1993.

Volume 2: *Technical Review Committee Meeting Minutes (November 1987 to December 10, 1992).*

1. Meeting minutes of December 3, 1987, Technical Review Committee (TRC) meeting to get acquainted, to discuss results of completed and planned investigations, and to establish future review procedures; undated.
2. Meeting minutes of January 11, 1988, TRC meeting to discuss the project schedule; January 26, 1988.
3. Memo to TRC members from Geoffrey Cullison, Naval Air Station, Brunswick, regarding corrections to the January 11, 1988, meeting minutes; February 3, 1988.

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4. Meeting minutes of May 17, 1988, TRC meeting to discuss the draft charter for the TRC at Brunswick and a review of the revised April 1988 RI/FS work plan; undated.
5. Meeting minutes of July 8, 1988, TRC meeting to attend a site tour and to confirm proposed locations; of field investigations, undated.
6. Meeting minutes of November 22, 1988, TRC meeting to review analytical data from the first round of sampling, and to establish parameters for the second round of sampling; undated.
7. Meeting minutes of February 22, 1988, TRC meeting to review validated analytical data from the first round of sampling, and to present preliminary information for the forthcoming risk analysis and alternative development deliverables; undated.
8. Memo of TRC meeting minutes of March 28, 1989, to discuss the structure of the third round of sampling; April 10, 1989.
9. Letter to Bruce Darsey, Department of the Navy, Naval Air Station, Brunswick, requesting copies of the March 27, 1989, TRC meeting minutes; April 18, 1989.
10. Letter to Senator William Cohen from E.B. Darsey, Department of the Navy, Naval Air Station, Brunswick, regarding a copy of the requested TRC meeting minutes, and the contact for the IRP program at the base; April 28, 1989.
11. Meeting minutes of June 20, 1989, TRC meeting to discuss the Additional Sampling Plan, the RI/FS program, and the schedule for its implementation; July 11, 1989.
12. Meeting minutes of August 10, 1989, TRC meeting to discuss the third round of sampling; undated.
13. Meeting minutes of February 13, 1990, TRC meeting to discuss the fourth round of sampling; January 22, 1990.
14. Letter to TRC members from James Shafer, Department of the Navy, Northern Division, regarding the May 22, 1990, TRC meeting minutes in which the Draft Initial Screening report, Draft Remedial Investigation report, and Draft Post-Screening Plan were discussed; July 12, 1990.
15. Memo to James Shafer, Department of the Navy, Northern Division, from Geoffrey Cullison, Naval Air Station, Brunswick, transmitting the omitted handout from the previous letter; July 19, 1990.
16. Letter to TRC members from James Shafer, Department of the Navy, Northern Division, regarding minutes from the September 13, 1990, TRC meeting; October 31, 1990.

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17. Letter to TRC members from James Shafer, Department of the Navy, Northern Division, regarding minutes from the January 10, 1991, TRC meeting; January 28, 1991.
18. Letter to James Shafer, Department of the Navy, Northern Division, from Melville Dickenson, ABB Environmental Services, Inc., regarding minutes from the October 3, 1991, TRC meeting; January 28, 1991.
19. Meeting minutes of February 20, 1992, TRC meeting to discuss the schedule and status of the IRP sites; undated.
20. Meeting minutes of May 20, 1992, TRC meeting to discuss schedules for the Sites 1 and 3 and Eastern Plume Records of Decision and Remedial Design, the site inspection work plan for Swampy Road Debris site and Merriconeag Extension Debris site, Site 8 Focused Feasibility Study and Proposed Plan, and the multi-site Feasibility Study; the minutes also included a discussion of the future actions scheduled for other sites; undated.
21. Meeting minutes of October 1, 1992, TRC meeting to discuss schedules for the Sites 1 and 3 and Eastern Plume Records of Decision and remedial design, the Building 95 Removal Action, the site investigation at Swampy Road Debris site and Merriconeag Extension Debris site, the proposed plans for Site 8, and Sites 5 and 6; the minutes also included a discussion of the future actions scheduled for other sites; undated.
22. Meeting minutes of December 10, 1992, TRC meeting to discuss schedules for the Building 95 Removal Action, the proposed plans for Sites 5 and 6, Site 8, and Site 9, the Sites 1 and 3 and Eastern Plume Records of Decision and remedial design, the remedial designs for Sites 5, 6, 8, 9, and Building 95, and the site investigation at Swampy Road Debris site and Merriconeag Extension Debris site; undated.

Volume 3: *Technical Review Committee Meeting Minutes (March 1993 to September 1993)*

Correspondence:

1. Meeting minutes of March 18, 1993, TRC meeting to discuss the accelerated schedule, undated.
2. Meeting minutes of June 10, 1993, TRC meeting to discuss schedule update, undated.
3. Meeting minutes of September 23, 1993, TRC meeting to discuss schedule update, undated.

SECTION 10: PROGRAM GUIDANCE

Volume 1: *Quality Assurance Program Plan*, prepared by E.C. Jordan Co. [ABB Environmental Services, Inc.]; February 1988 (all sites)

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Federal Facility Agreement among the U.S. Department of the Navy, USEPA, and Maine DEP; October 10, 1990.

Correspondence:

1. Letter to Robert Kowalczyk, Department of the Navy, Northern Division, from Cynthia Bertocci, Maine DEP, regarding the state's interest in the Installation Restoration Program for Brunswick Naval Air Station; February 24, 1986.
2. Letter to L.K. Jones, Naval Air Station Brunswick, from Anthony Leavitt, Maine DEP, regarding the state's interest in the Installation Restoration Program for Brunswick Naval Air Station; February 25, 1986.
3. Letter to Naval Facilities Engineering Command, Northern Division, from L.K. Jones, Naval Air Station Brunswick, regarding the Navy's assessment and control of installation pollutants (NACIP) program and guidance involving federal and state regulatory agency oversight; March 11, 1986.
4. Letter to Commanding Officer, Naval Air Station Brunswick, from Commanding Officer, Naval Facilities Engineering Command, Northern Division, regarding federal and state environmental agencies oversight authority of the NACIP program; April 7, 1986.
5. Letter to David Webster, USEPA, from K.J. Vasilik, Naval Air Station Brunswick, regarding the definition of the RI/FS program at the NAS Brunswick; January 20, 1987.
6. Letter to David Epps and Robert Kowalczyk, Naval Facilities Engineering Command, Northern Division, from Charlotte Head, USEPA, regarding the current status and goals of the investigations; June 29, 1987.
7. Letter to Charlotte Head, USEPA, from R.L. Gillespie, Naval Facilities Engineering Command, Northern Division, regarding the Navy's timetable to complete Remedial Investigation Feasibility Study at the Naval Air Station Brunswick, and outlining the Navy's understanding of the responsibilities of the various agencies involved in the RI/FS program; October 22, 1987.
8. Letter to Charlotte Head, USEPA, from Kenneth Finkelstein, National Oceanic and Atmospheric Administration, regarding the June 10, 1987, Trustee Notification Form for Naval Air Station Brunswick; November 10, 1987.
9. Letter to Charlotte Head, USEPA, from T.G. Sheckels, Department of the Navy, Northern Division, regarding the listing of Naval Air Station Brunswick on the NPL, the establishment of the Administrative Record, and the Technical Review Committee for the base; November 16, 1987.
10. Letter to R.L. Gillespie, Naval Facilities Engineering Command, Northern Division, from David Webster, USEPA, regarding the schedule to be published by February 1988, a mechanism for delineating the roles and responsibilities of

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the agencies, and the USEPA's concerns over the progress to date; November 20, 1987.

11. Memo to Charlotte Head, USEPA, from Joan Coyle, USEPA Water Monitoring Section, regarding sampling results from the Jordan Avenue Well Field in Brunswick, Maine; December 10, 1987.
12. Letter to G.D. Cullison, Naval Air Station Brunswick, and T.G. Sheckels, Naval Facilities Engineering Command, Northern Division, from David Webster, USEPA, regarding the definition of the commencement of the RI/FS under the Comprehensive Environmental Response, Compensation, and Liability Act; December 17, 1987.
13. Letter to Merrill Hohman, USEPA, from E.B. Darsey, Naval Air Station Brunswick, regarding comments received at the February 10, 1988, TRC meeting on the status of the RI/FS program; February 17, 1988.
14. Letter to Ronald Springfield, Naval Facilities Engineering Command, Northern Division, from David Webster for Charlotte Head, USEPA, regarding the extent of quality assurance and quality control of validation for samples at Naval Air Station Brunswick; April 25, 1988.
15. Letter to Ronald Springfield, Naval Facilities Engineering Command, Northern Division, from David Webster for Charlotte Head, USEPA, regarding the evaluation of sites that were not incorporated into the [Hazard Ranking System] package, especially Sites 5 and 6; April 25, 1988.
16. Letter to Meghan Cruise, USEPA, from Alan Prysunka, Maine DEP, regarding comments on the Federal Facility Agreement; November 8, 1989.
17. Letter to Meghan Cruise, USEPA, from Susan Weddle, TRC community member, regarding comments on the Federal Facility Agreement; November 16, 1989.
18. Letter to Meghan Cruise, USEPA, from Jeanne Johnson, Town of Brunswick Conservation Commission, regarding a request for an extension for review and comment of [the documents included in the Information Repository for] the Brunswick Naval Air Station; November 17, 1989.
19. Letter to Alan Prysunka, Maine DEP, from Merrill Hohman, USEPA, regarding the state's comments on the [Federal Facility] Agreement; December 18, 1989.
20. Letter to William Adams, E.C. Jordan Co. [ABB Environmental Services, Inc.], from R.L. Gillespie, Department of the Navy, Northern Division, regarding a schedule extension for the Draft Initial Screening Report [Feasibility Study]; February 1, 1990.
21. Letter to T.G. Sheckels, Department of the Navy, Northern Division, from Merrill Hohman, USEPA, regarding an amendment to the Federal Facility Agreement; February 9, 1990.

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22. Letter to Alan Prysunka, Maine DEP, from T.G. Sheckels, Department of the Navy, Northern Division, regarding Applicable or Relevant and Appropriate Requirements (ARARs) for Remedial Investigation/ Feasibility Study at Naval Air Station Brunswick; March 6, 1990.
23. Letter to Ken Marriott, Naval Facilities Engineering Command, Northern Division, from Meghan Cassidy, USEPA, regarding a request concurrence between the agencies for an extension to the Remedial Investigation schedule; March 12, 1990.
24. Letter to Thomas Sheckels, Naval Facilities Engineering Command, Northern Division, from Alan Prysunka, Maine DEP, regarding ARARs [Applicable or relevant and appropriate requirements] for Naval Air Station Brunswick; April 9, 1990.
25. Letter to Meghan Cassidy, USEPA, from K.R. Marriott, Department of the Navy, Northern Division, regarding an extension under the FFA for preparing the response to comments on the Draft Feasibility Study and Draft Remedial Investigation reports; May 18, 1990.
26. Letter to James Shafer, Naval Facilities Engineering Command, Northern Division, from Meghan Cassidy, USEPA, regarding a notice to proceed with the Feasibility Study activities at Naval Air Station Brunswick; June 21, 1990.
27. Letter to Meghan Cassidy, USEPA, from James Shafer, Naval Facilities Engineering Command, Northern Division, regarding an extension under the FFA for preparing the response to comments on the Draft Feasibility Study and Draft Remedial Investigation reports; June 25, 1990.
28. Letter to James Shafer, Department of the Navy, Northern Division, from Ted Wolfe, Maine DEP, regarding invertebrate tissue analysis for mercury along the Maine coast for establishing background mercury levels; February 24, 1992.
29. Letter to Cmdr. Ron Terry, Naval Air Station Brunswick, from Meghan Cassidy, USEPA, regarding sampling of Mere Brook, April 23, 1992.
30. Letter to James Shafer, Naval Facilities Engineering Command, Northern Division, from Mary Sanderson, USEPA, regarding the proposed accelerated schedules for the naval air station; January 11, 1993.

By Reference ONLY with location noted:

U.S. Environmental Protection Agency, 1988. "Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA"; Office of Solid Waste and Emergency Response; OSWER Directive 9335.3-01; Interim Final; October 1988.

U.S. Environmental Protection Agency, 1988. "Engineering Evaluation/ Cost Analysis

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