



Brunswick Area Citizens for a Safe Environment

P.O. Box 245 Brunswick, Maine 04011 (207)725-1330

July 25, 1996

Fred Evans

Department of the Navy  
Northern Division

Leicester, PA. 19113-2090 Fax 610-595-0555

Dear Fred:

Please find enclosed Review of  
June 1996 Draft Sites 4, 11, 13 prepared  
by Le Page Environmental Services, Inc.

Should you have any questions  
concerning this review, please contact  
Carolyn Repage at 207-777-1049 -

Sincerely,

Rockie Rofe  
Secretary -

# Lepage Environmental Services, Inc.

P. O. Box 1195 • Auburn, Maine 04211-1195 • 207-777-1049 • Fax: 207-784-3817

July 23, 1996  
File #102

Ms. Loukie Lofchie  
Brunswick Area Citizens for a Safe Environment  
P. O. Box 245  
Brunswick, ME 04011

Subject: Review of June 1996 *Draft Sites 4, 11, 13 Proposed Plan*

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Lepage Environmental Services, Inc., as a consultant to Robert G. Gerber, Inc., has reviewed the *Draft Sites 4, 11, 13 Proposed Plan*, dated June 1996. The document was prepared by ABB Environmental Services, Inc., (ABB-ES) for the U. S. Department of the Navy for the Naval Air Station Brunswick (NAS Brunswick) located in Brunswick, Maine. In the subject document, the Navy presents their preferred option for long term measures for soil and ground water at Sites 4, 11, and 13.

Site 4 is the Acid/Caustic Pit located under the eastern end of building 584. The pit was used for the disposal of liquid wastes between 1969 and 1974. During the 30-year period Site 11 was used as a Fire Training Area, waste liquids, including fuels, oils, and degreasing solvents, were burned during fire training exercises. Site 13, which is located adjacent to Site 4 and Building 584, included three underground storage tanks that were removed in the 1980s. The tanks were used to store diesel fuel and waste fuels, oils, and degreasing solvents.

Based on environmental investigations that began in 1988, The Navy concluded that Site 11 was the primary source of contamination in the Eastern Plume, and that Sites 4 and 13 are no longer contributing ground water contamination in the Eastern Plume. In the subject document, the Navy proposes no further action at Sites 4, 11, and 13, although remediation and long term monitoring of ground water contamination in the Eastern Plume will continue. The Navy will also be adding wells to the monitoring program to further investigate ground water contamination in the vicinity of Sites 4, 11, and 13.

Based on the schedule included in the subject document, there will be other opportunities for BACSE to provide comments on the Navy's proposal for Sites 4, 11, and 13. The Navy will be holding a public meeting and hearing on October 2, 1996, to present the preferred option described in the *Proposed Plan* and address questions from the public. Written opinions and comments must be submitted between September 20 and October 19, 1996. The Navy will subsequently issue a Record of Decision.

Page 2 of 2, L. Lofchie  
July 23, 1996  
Draft Sites 4, 11, 13 Proposed Plan

Following a brief review, our comments on the *Draft Proposed Plan* are as follows:

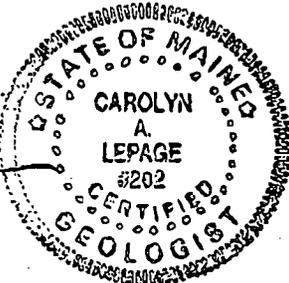
1. **Page 1.** The Navy states that the ground water component of the *Proposed Plan* is that same as that specified in the June 1992 Eastern Plume Interim Record of Decision (ROD). Given the additional data that has become available since June 1992, will it be necessary or desirable to amend or revise the ground water component as it is addressed in the June 1992 ROD?
2. **Page 1.** The acronym DRMO should be explained.
3. **Page 2-3.** With regard to no further action at Site 4, we recall discussions at a Restoration Advisory Board (RAB) meeting that, should Building 584 be demolished, additional investigations of the Acid/Caustic Pit would be conducted. How will that be addressed under the *Proposed Plan* or the resulting ROD?
4. **Page 3.** Did the Maine Department of Environmental Protection (DEP) sign the June 1992 ROD? If not, will the DEP sign the new ROD?
5. **Page 3.** The Navy is proposing to add wells in the vicinity of Sites 4, 11, and 13. Additional wells that are properly situated should help determine if Sites 4 and 13 are no longer contributing ground water contamination to the Eastern Plume, and that the remaining contaminants at Site 11 do not pose a risk. The number of wells and their locations should be determined in discussions that include the entire RAB, not just the Navy, DEP, and EPA.
6. **Page 3.** How was the potential for radioactive hazards evaluated at Sites 4, 11, and 13 and where are the results documented?
7. **Page 3.** Will deed restrictions, installation of signs an/or protective fencing, or other measures be implemented at Sites 4, 11, and 13?

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

Sincerely,  
Lepage Environmental Services, Inc.

*Carolyn A. Lepage*

Carolyn A. Lepage, C.G.  
President



cc: Andrews L. Tolman, Robert G. Gerber, Inc.  
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