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L page Environmental S rvic s, Inc.

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January 5, 1998

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

Subject: Review of the November 1997 *Revised Draft Final Record of Decision for No Further Action at Sites 4, 11, and 13 and a Remedial Action for the Eastern Plume*

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 *Revised Draft Final Record of Decision for No Further Action at Sites 4, 11, and 13 and a Remedial Action for the Eastern Plume* dated November 1997. The document was prepared by ABB Environmental Services, Inc., 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 the final remedial action selected for long term measures for soil and ground water contamination associated with Sites 4, 11, and 13.

The three sites, the Acid/Caustic Pit at Site 4, the Fire Training Area at Site 11, and the fuel and waste liquid underground storage tanks at Site 13, lie within several hundred feet of each other. As a result of environmental investigations performed since 1988, the Navy concluded that Site 11 was the primary source of ground water contamination in the Eastern Plume, and that Sites 4 and 13 are n longer contributing to ground water contamination in the Eastern Plume. In the *Record of Decision* (ROD), the Navy states there will be no further action for soils at Sites 4, 11, and 13, but that remediation and long term monitoring of contaminated ground water in the Eastern Plume will continue. The Navy will be adding wells to the monitoring program to further investigate ground water contamination in the vicinity of Sites 4, 11, and 13 and will consider the need for additional investigation at Building 584 at Site 4 should it be demolished in the future. At the October 1997 meeting of the Restoration Advisory Board (RAB), the Navy stated it would also be conducting additional investigations southeast of Site 11.

BACSE provided oral comments at the October 17, 1996, public meeting held on the *Sites 4,11,13 Proposed Plan*, which described the Navy's preferred option for long term measures for soil and ground water at Sites 4, 11, and 13. Written comments were provided on the March and July 1997

Draft Record of Decision documents in our letters to you dated April 3, and August 16, 1997, respectively. Our comments on the latest version of the ROD are as follows:

1. General Comment. Concerns have been voiced at a number of RAB and technical meetings about the potential for dense nonaqueous phase liquid (DNAPL) contamination as a result of past activities at Site 11. At the October 10th Restoration Advisory Board meeting, the Navy indicated that they would be performing additional investigations to the southeast of Site 11. However, with the exception of the revisions to pages 14 and 21 that state that the potential for contaminated soils exists and that the No Action Decision for Site 11 may be revisited if groundwater monitoring shows contaminated soils are a continuing source of contamination, the rest of the ROD appears to imply that the door is closed to further investigation. It would be appropriate to mention the additional investigations the Navy intends to conduct (and the potential impact on the No Action Decision and long term monitoring) in several places in the ROD, such as the descriptions of Site 11 on page 14 and pages 25 through 28, and in sections describing the response action, such as pages 3, 21, 42, and 45.

2. Page 52. The Navy states that it will pursue the option of discharge of treated water to groundwater in Section IV, Scope and Role of Response Action. How does the cost of this option compare with the costs presented on page 52?

3. Page 54. In comment 5 in our August 16th letter, we asked if there had been any revisions to the estimate of 13 to 71 years to attain cleanup goals throughout the plume. The text of the latest version of the ROD has not been revised, but it is unclear to us if that is because the estimated cleanup time is still 13 to 71 years or because our comment was overlooked. Please clarify.

Please do not hesitate to give us a call if you have any questions about our comments.

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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