



STATE OF MAINE

Department of Environmental Protection

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JOHN R. McNERHAN, JR.
GOVERNOR

June 7, 1991

DEAN C. MARRIOTT
COMMISSIONER

Mr. James Shafer
Department of the Navy, Northern Division
Naval Facilities Engineering Command
Building 77-L
Philadelphia Naval Shipyard
Philadelphia, PA 19112-5094

Re: Naval Air Station Brunswick, Draft Supplemental
Feasibility Study Sites 5, 6, and 12, April, 1991, by
E.C. Jordan Co.

Dear Mr. Shafer:

The Maine Department of Environmental Protection (MEDEP) has completed its review of the Draft Supplemental Feasibility Study Sites 5, 6, and 12, which was submitted to the DEP by E.C. Jordan Co. on April 23, 1991 on behalf of the U.S. Department of the Navy for the Naval Air Station Brunswick (NASB) Site.

The MEDEP does not approve of the report as presented for the reasons outlined in this correspondence. The Department requests that the Department's comments be reviewed and incorporated into a second draft version of the document.

Following review of this report, the MEDEP has become concerned that the RI process may not have been sufficiently completed at Sites 5 & 6 to allow for the proper development of a Feasibility Study for these sites. The Department wishes to avoid a situation in which the schedule agreed to early this year drives the review process to such an extent that possible data gaps are not recognized. The Department believes that a discussion of this matter is warranted.

General Comments:

It appears that the remedial alternatives were developed without a clear definition of the problem associated with sites 5 and 6. The extent of the investigation has been mostly limited to a review of the sites' history. The EM and GPR work at sites 5 and 6 appear to be somewhat inconclusive. Soil sampling appears to be limited to surficial sampling. No soil borings or test pitting were

conducted to detail the extent and depth of asbestos containing material or possibly other soil contaminants. The MEDEP believes that the lack of more detailed information may have impacted the assessment of alternative options, including the effectiveness, implementability and/or cost of these alternatives. Consequently, undesirable alternatives may have been carried forward or preferable alternatives may have been eliminated.

The MEDEP recommends that before proceeding to the Focused Feasibility Study, consideration must be given to the limited amount of information currently available and whether this information is sufficient to adequately address the alternatives under consideration. It also appears that the current information will not meet the needs of the reporting requirements outlined under MEDEP Solid Waste Management Regulations, Chapter 401.7 (F).

The following ARAR's concerning landfilled asbestos material and landfill closure must be considered. These ARAR's provide additional detailed information and expand upon information provided in MEDEP correspondence to NORDIV dated April 9, 1990:

38 MRSA Chapter 13: Waste Management

Subchapter 1, Maine Hazardous Waste, Septage, and Solid Waste Management Act, Section 1301 et. seq.: Sets forth the authority to identify and regulate hazardous waste.

Chapter 400-406, Solid Waste Management Rules:
(5-24-89) These rules apply to the siting, operation and closing of solid waste disposal facilities.
(Action, Chemical, and Location Specific)

Chapter 401, Landfill Disposal Facilities: (5-24-89)
This chapter establishes the rules of the Board and the Department for disposal by landfilling of special wastes. Requirements are specified for closure of the facility and post closure maintenance. (Action Specific)

Chapter 401.7 (C), Minimum Standards and Specifications for Final Cover: This subchapter specifies the extent, permeability, allowable slopes and cover systems for secure landfills. The cover system requires a minimum of 2 feet of suitable material or a geonet covered with a layer of suitable medium for supporting vegetative growth. (Action Specific)

Chapter 401.7 (F), Permanent Record: This subchapter provides the requirement to prepare and record specific information in the Registry of Deeds, including the extent and depth of waste material and the location

coordinates of asbestos containing waste materials.
(Action Specific)

Chapter 405.4, Storage, Transport, and Disposal of Asbestos Containing Material: The requirements of this subchapter shall apply to the storage and disposal of any asbestos-containing material and asbestos-containing wastes including the installation and maintenance of signs and fencing.

The MEDEP prefers alternatives that meet long-term remedial objectives that result in the permanent reduction of the level of contamination and that attain overall protection of human health and the environment as well as achieve chemical, location, and action specific ARAR's outlined in the RI/FS process.

Specific Comments:

Page	Section	Comments
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2-10,	section 2.1.1.2, Site 6:	The GPR survey identified two major anomalies at Site 6 and identified a semicircular area across the site. Figure 2-5 outlined the area but did not include anomaly A in this designated area.
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2-12,	section 2.1.2.1, Exposure Assessment:	If Site 6 is an area with easy access by children, base security or other base personnel must have some knowledge of the frequency at which children play there. In order to adequately assess exposure, this information must be obtained or estimated. Discussion must be included regarding possible future disturbance to the site with the possible results of such exposure.
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2-13,	section 2.1.2.2, Human Health Risk Characterization:	The potential risk of exposure to asbestos during construction or excavation must be addressed. Additional subsurface samples should be collected in order to gather the necessary information.
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2-18,	section 2.3.1, Remedial Action Objectives Sites 5 & 6:	The statement that "the objectives will be to reduce the potential for contact with asbestos..." seems to prematurely screen out a removal/treatment alternative.
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3-7,	table 3-1, Maine Drinking Water Rules:	Maximum Exposure Guidelines (MEG's) are set by the Department of Human Services and are defined as levels considered safe in drinking water. The MEDEP has enforced MEG's as clean-up levels in orders under State law. The State does not consider groundwater cleanup levels set above MEG's as protective of human health if the groundwater in question is to be considered as drinking water. 38 M.R.S.A., Chapter 3,
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Section 470 (identified in this report as an applicable requirement) classifies groundwater as GW-A. This means that groundwater must be safe to drink. The State considers groundwater safe to drink if it meets the MEG.

3-8, Table 3-1, Maine Ambient Air Quality Standards: In addition to particulate emissions, Chapter 110 also limits concentrations of hydrocarbon and VOC emissions.

3-11, Table 3-1, Maine Natural Resources Protection Act: Although permits will not be required of activities conducted on site, substantive permit requirements must be met.

3-12, Table 3-1: To be classified as GWA, groundwater must meet MEG's. MEG's are "to be considered". MEG's must be utilized when MCL's are not available. List MEG's as TBC's.

3-12, Table 3-1: Substantive permit requirements must be met.

3-20, Table 3-1, Maine Ambient Air Quality Standards: Concentrations of hydrocarbon and VOC emissions are also limited.

3-21, section 3.2, Table 3-4 Potential Action Specific ARAR's: This table must contain reference to action specific State ARAR's applicable to asbestos waste landfill closures. These ARAR's have been identified in previous correspondence as well as the general comments of this letter.

4-2, table 4-1, Identification of Remedial Technologies: This table does not adequately allow a comparison between alternatives since the alternatives do not appear to be compared to the same criteria (ie. protection of human health, compliance with ARAR's, reduction of toxicity, cost, etc.). A summary as presented in Table 4-1 of the Draft Focused Feasibility Study; Sites 1 & 3 will be more useful. The liability issue may be an important criteria by which to compare alternatives. The reasoning to retain or eliminate alternatives in Table 4-2 is unclear.

5-2, section 5.1, Sites 5 & 6: The statement that at Site 5 "it is unknown how much of the surrounding soils may have become contaminated with asbestos..." and "the extent of asbestos-containing materials disposed of at Site 6 is unknown" points to a developing MEDEP concern that the FS process at these sites has progressed too rapidly and that additional characterization of these sites is necessary before adequate remedial alternatives can be considered.

5-5, section 5.1.3, Alternative 5, 6-C Soil Cover: As described, this alternative will not meet the needs of MEDEP Regulations, Chapter 401.7 (F) or 405.4.

5-6, section 5.1.5, Alternative 5,6-E

Excavation/Vitrification Treatment: This alternative was eliminated because no commercial plants are in operation yet, it is stated that Siclo Recycling Ltd. is beginning operations in the summer of 1991.

6-2, section 6.1.2, Implementability: Unless the remedial alternatives are reviewed utilizing the same criteria, an effective comparison cannot be made.

6-6, section 6.2.3, Alternative 5,6-C Soil Cover: Specific methods to restrict site access must be mentioned. Reference should be made to the risk of exposure during possible future excavations. A 6 inch soil cover will not be adequate to meet Maine requirements for closure.

6-7, section 6.2.4, Alternative 5,6-D Capping: Specific methods to restrict site access must be mentioned. References should be made to risk exposure during possible future excavations.

6-11, Table 6-1 to 6-6: The limitations and short comings of this screening process due to the inconsistent application of criteria do not allow for the proper comparison of alternative effectiveness, implementability, and cost. It is not clear how the conclusion for each alternative was reached.

A-1, Attachment 1: Identify the specific correspondence to which these responses apply.

If you have any concerns or questions regarding these comments, please contact me at (207) 289-2651.

Sincerely,



Ted Wolfe
Division of Site Investigation and Remediation
Bureau of Hazardous Materials and Solid Waste Control

cc: Michael Barden, MEDEP
Sam Butcher, Harpswell Representative
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