



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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November 6, 1992

Mr. James Shafer
Project Manager, Code 1821
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, Penna. 19112-2090

Dear Jim:

The Maine Department of Environmental Protection has received and reviewed the "Draft Proposed Plan, Site 5 & 6, Orion Street Asbestos Disposal Site, Sandy Road Rubble and Asbestos Disposal Site" dated October, 1992, for Naval Air Station Brunswick. The Department concurs with the Navy's Preferred Alternative and has a few comments on the draft Proposed Plan for Site 5 & 6. The Department's comments include:

1. Page 2-2 The 30 day public comment period differs from that given on the revised schedule;
2. Page 2-6 The new state Remedial Project Manager is Nancy Beardsley, Division of Federal Facilities Remediation, Office of the Commissioner. She starts on November 30, 1992. Mark Hyland will continue as Project Manager on sites 5, 6, & 8 until the Record of Decisions are signed. Please note the DEP phone number has changed to (207) 287-2651.;
3. Page 3-7 Statements about monitoring ground water at Site 6 appear to conflict with a following sentence that indicates ground water was not of concern. This paragraph should be reworded to be less ambiguous. Asbestos may not be the only ground water contaminant of concern at Site 6 as aircraft parts and construction debris were reportedly disposed of at the site.;
4. Page 3-13 Section 3.1.3 Paragraph #3 What did the sample of the material resembling pipe covering reveal? This paragraph was ambiguous as to whether the pipe was asbestos or not.;
5. Page 3-14 Section 3.1.4 - Groundwater. States that "Groundwater at Site #5 was not monitored because asbestos fibers do not migrate in the subsurface environment." Ground water was monitored at Site #6 but again not for asbestos. Please cite the reference used to support the statement that asbestos fibers do not migrate in the subsurface.
6. Page 6-10 Paragraph #1. A tracked bulldozer is used as an example of conventional construction equipment. While a tracked bulldozer is a good example of equipment used to

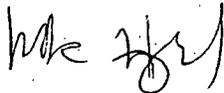
spread and grade cover soils, additional equipment such as a sheepfoot roller are necessary for proper compaction of the cover soils. and;

7. Page 6-13 Could the expected components of the five-year site reviews at Site #6 be added?

The Department has no further comments on the Proposed Plan at this time. If you have questions about the above comments please contact me. We look forward to public comments on the Plan during the public comment period and at the Public Meeting on Sites 5 & 6 on January 28, 1993.

Finally, I noted in Meghan Cassidy's letter to you of October 9, 1992 regarding Building 95 that the topic of Maine's MEGs has been raised again. Meghan's comment #34 on page 5 of the letter states that "Maine MEGs are not promulgated and therefore are not enforceable standards." Although she is correct in the context of building 95, a pesticide contaminated soil site, Maine's MEGs are however, fully promulgated regulations and enforceable standards in the context of any solid waste site such as Sites 1, 3, 5, 6, 8, 9, 12, 14, and any of the new solid waste sites. The MEGs were promulgated in the Maine Solid Waste Management Regulations Chapters 400-406, 408 and 409 on May 24, 1989. The reference for the MEGs can be found in CMR 400.1 (Y) on page 7 of the regulations.

Sincerely,



Mark R. Hyland
Director, Federal Facilities Remediation
Office of the Commissioner

cc: Meghan Cassidy, USEPA
Jim Carruthers NAS Brunswick
Carolyn Lepage, R.G. Gerber Inc.
Bill Webber, ABB Environmental
Rene Bernier, Topsham
Sam Butcher, Harpswell
Susan Weddle, Brunswick
Brunswick/Topsham Water District