



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

December 18, 1992

Mr. James Shafer
Northern Division
Naval Facilities Engineering Command
Code 1821/JS
10 Industrial Highway, Mailstop #82
Lester, PA 19113-2090

Re: Draft Final Proposed Plan
Sites 5 and 6
Naval Air Station Brunswick

Dear Mr. Shafer:

The United States Environmental Protection Agency (EPA) has reviewed the report entitled "Draft Final Proposed Plan, Sites 5 and 6, Orion Street Asbestos Disposal Site, Sandy Road Rubble and Asbestos Disposal Site" dated December 1992. The report was submitted by the Department of the Navy for Naval Air Station Brunswick in Brunswick, Maine.

EPA's comments regarding the draft proposed plan are included as Attachment I. The comments provided do not include comments from the EPA Office of Regional Counsel (ORC). These comments will be submitted under separate cover.

Should you have any questions regarding these comments or wish to discuss them further, please contact me at (617)573-5785.

Sincerely,

Meghan F. Cassidy

Meghan F. Cassidy
Remedial Project Manager

Enclosures

cc: Mark Hyland/ME DEP
Susan Weddle/BASCE
Bill Weber/ABB
~~Jim Caruthers/NASB~~
Bob DiBiccaro/EPA



ATTACHMENT I

The following comments pertain to the report entitled "Draft Final Proposed Plan, Sites 5 and 6, Orion Street Asbestos Disposal Site, Sandy Road Rubble and Asbestos Disposal Site". The report was submitted by the Department of the Navy for Naval Air Station Brunswick.

1. Page 1-1, ¶ 1: EPA recommends that the following sentence be inserted after the first sentence of this paragraph.

"Sites 5 and 6 are two of 13 sites being addressed by the Navy as part of the cleanup of hazardous materials at NAS Brunswick pursuant to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)."

2. Page 1-4, ¶ 4: The third sentence of this paragraph indicates that the proposed cover system for Site 6 is consistent Maine performance requirements for an asbestos disposal site. It should be clarified in the text that the cover system meets the performance requirements for a construction debris landfill, which are more stringent than those for an asbestos disposal site.
3. Page 2-3, 1st sentence: The word "provides" should be deleted from the sentence.
4. Page 5-1: The title of this section should be revised to read "Proposed Cleanup Objective" since there is only one objective.
5. Page 6-1, ¶ 4: In the draft version of the proposed plan, a discussion was included which explained that Site 6 would require closure under solid waste regulations even if the asbestos were removed since other solid waste (i.e., construction debris) was disposed of at Site 6. This information was not included in the draft final version. A discussion regarding this should be included in the final proposed plan.
6. Page 6-2, ¶ 2: According to this paragraph, the proposed cover system will meet the requirements of the Maine regulations for closure of an asbestos disposal site. This is not accurate since the cover system design meets the requirements for a construction debris landfill which is more stringent than both a RCRA Subtitle D cover and a MEDEP asbestos cover. The text needs to be clarified to indicate this.
7. Page 6-4, Low-permeability Cover Construction: Again, the text needs to be clarified regarding the cover system and what requirements its design will meet. The text should state that the cover system meets the requirements for

closure of a construction debris landfill under Maine solid waste regulations. The text should further indicate that this design is more stringent than that required under RCRA Subtitle D or Maine regulations for closure of asbestos disposal sites.

8. Page 6-8, ¶ 2: The discussion presented here regarding which regulations the cover will be designed to meet is confusing. The text should be clarified to indicate that the proposed cover will meet requirements for closure of a construction debris landfill under Maine solid waste regulations. The text should also indicate that these requirements are more stringent than both a RCRA Subtitle D cover and a MEDEP asbestos cover.
9. Page 7-3, Excavation/Off-Site Disposal: The text should include an estimate of how much material would be excavated from both Sites 5 and 6 under this alternative.
10. Page 8-2, ¶ 2: The text cites only one solid waste ARAR. This discussion should identify RCRA Subtitle D, and both Maine solid waste regulations for asbestos and construction debris. The text should then discuss that the preferred alternative meets the requirement of the most stringent ARAR.
11. Page 8-4, 1st line: The words "inhalation of asbestos" do not logically fit in this sentence. Revise the text.