

**ROBERT G.
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June 24, 1993
File #965

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

Subject: Review of "Draft Record of Decision for a Remedial Action at Sites 5 and 6,
Naval Air Station Brunswick, Brunswick, Maine", June 1993.

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc., has reviewed the "Draft Record of Decision for a Remedial Action at Sites 5 and 6, Naval Air Station Brunswick, Brunswick, Maine", dated June 1993. The document was prepared by ABB Environmental Services, Inc. (ABB) for the U. S. Department of the Navy for the Naval Air Station Brunswick (NASB) located in Brunswick, Maine. The Record of Decision (ROD) is intended to document the remedial action selected by the Navy to remediate the potential threat posed by Sites 5 and 6 to human health and welfare or the environment. The current schedule calls for the draft Final ROD to be submitted for review by regulatory agencies on July 26, 1993, with the Final ROD submitted to the U.S. Environmental Protection Agency, the Maine Department of Environmental Protection, and the Navy for signature on August 31, 1993.

Site 5, also known as the Orion Street Asbestos Disposal Site, is located off Merriconeag Road about 1,500 feet from the southeastern corner of the runways at NASB. The site was reportedly used in 1979 for disposal of asbestos-lined or covered pipe from a demolished NASB building. Site 6, the Sandy Road Rubble and Asbestos Disposal Site, was reportedly used for disposal of construction debris until the late 1970s. Site 6 is located in the east central part of NASB adjacent to Sandy Road. As described in the subject document, the Navy intends to remove the pipes from Site 5 and the construction rubble and asbestos-contaminated material from Site 6. The material will be transported across NASB and disposed of as subgrade fill beneath the landfill cap at Sites 1 and 3.

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Our comments on the subject document are as follows:

1. Pages 1-4, 23, 29, 50, and 52. The proposed alternative to excavate and move the material from Sites 5 and 6 to Sites 1 and 3 meets one of BACSE's objectives to consolidate wastes at NASB, thereby reducing the number of "sites" unavailable for future use should the Navy ever close the Base. The description of the selected remedy concludes that no long-term controls will be necessary since asbestos-contaminated or non-hazardous material will be removed from the sites, and that asbestos is the only contaminant of concern or posing a risk. However, information concerning the exact nature of the wastes disposed at Sites 5 and 6 is lacking. If contaminants other than asbestos are discovered during the excavation of either Site 5 or 6, additional monitoring, land-use restrictions, or other longer term measures may be required.
2. Pages 1 and 10. The pipes at Site 5 are described as asbestos-covered on page 1, and asbestos-lined on page 10. The Navy should clarify if the asbestos is on the inner or the outer surface of the pipes, and whether the location of the asbestos on the piping is significant in terms of the remediation effort.
3. Pages 3, 61, and Appendix A. In response to a question raised by a member of the public at the April 8, 1993, public hearing concerning sampling for radioactive materials, the Navy responded that the contractor performing the work will address monitoring of radioactive hazards in a "Safety, Health, and Environmental Response Plan", or SHERP (see Comment 3 in Appendix A). While the Navy's response indicates that regulators and the Technical Review Committee (TRC) members would be advised should radioactive material be discovered at either site, there does not appear to be a provision to evaluate the adequacy of the monitoring proposed in the SHERP. BACSE members request the opportunity to review the specifics of the SHERP, such as the instrument(s) proposed, frequency of monitoring, and other details. In addition, the text of the ROD should indicate what potential hazards, beside asbestos, the health and safety plan or the SHERP will address.
4. Page 21 and Appendix A. The text should be revised to indicate that BACSE is currently a member of the TRC, but has not been an active participant since the TRC was formed in early 1988.
5. Pages 35, 43, and References. The preferred alternative listed in Table 1 on page 35 and described on page 43 is numbered 5,6-F. However, the March 1993 Technical Memorandum describing the preferred alternative numbers it as 5,6-E. Please clarify which is correct.
6. Page 43, 63, and 64. The description of the preferred remedial alternative includes confirmation sampling once excavation of the sites is complete. However, because of the uncertainty regarding the exact nature of the wastes disposed at Sites 5 and 6, there remains concern that additional contaminants might be discovered during the excavation process. How

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will the material be evaluated during the removal process to determine if the confirmation sampling plan developed during the design phase is adequate to confirm no site-related contaminants are left in place? The confirmation sampling plan is described as being submitted for regulatory review and approval. BACSE members request that TRC representatives have an opportunity to review the confirmation sampling plan as well.

7. Page 67. The Site Restoration section does not mention followup inspections to check the progress of site revegetation once seeding and mulching are completed.

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

Sincerely,
Robert G. Gerber, Inc.

Carolyn A. Lepage

Carolyn A. Lepage, C. G.
Director of Operations

