

# HDA-CAN Boston, MA 02203

## Facsimile Request

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Comment(s):  
Here are the remaining comments/revisions  
on the 596 ROD. I will discuss them with  
you before Monday morning.

Date Sent: 8/13/93  
 Time: \_\_\_\_\_  
 By: \_\_\_\_\_  
 Confirmed: \_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_

1/16

Additional EPA comments pertaining to the Draft Final ROD for Sites 5 and 6

Page 56, Compliance with Applicable or Relevant and Appropriate Requirements

The first paragraph under this heading should be rewritten as follows.

\*The cover system component of the Selected Alternative at Sites 1 and 3, which meets RCRA Subtitle C requirements, meets or exceeds the performance requirements of the Maine Landfill Disposal Regulations for the Management, Testing, and Disposal of Special Wastes (38 MRSA Section 1304, Chapter 405.4) governing disposal of asbestos, and the State of Maine Solid Waste Management Regulations (Chapter 401.7) governing the closure of solid waste landfills. The State of Maine requirements pertaining to the storage, transport and disposal of asbestos wastes (MEDEP Regulations, Chapter 405.4) will also be met. The Selected Alternative, Excavation and Use of Subgrade Material at Sites 1 and 3, exceeds the requirements of the most stringent ARAR, which is the State of Maine Solid Waste Management Regulations, Chapter 401.7. It should be noted that although the cover system at Sites 1 and 3 exceeds state and federal requirements for asbestos and construction debris, the landfill at Sites 1 and 3 is an unlicensed facility with regards to the asbestos disposal requirements of these regulations. However, the Maine Division of Solid Waste Facility Licensing has stated that a license is not required since disposal of the material at Sites 1 and 3 would be part of a remedial action at a CERCLA site (MEDEP, 1993). The Low-permeability Cover and the Consolidation Low-permeability Cover alternatives for Sites 5 and 6 would also comply with these ARARs.

Page 85, ¶ 1

Delete the fifth sentence of this paragraph.

Page 85, ¶ 2

Delete this paragraph.

Page 86, ¶ 1

Replace the phrase "are applicable" in the first sentence of this paragraph with "pertain".

Page 86, ¶ 2

Delete the language presently in the text and insert the new language provided above for page 56.

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Page 57, bottom of page and page 86, bottom of page

Insert the following language on both of these pages.

"Transport of material from Sites 5 and 6 to Sites 1 and 3 requires consideration of additional ARARs for Sites 1 and 3 than those specified in the ROD for Sites 1 and 3. These ARARs are summarized in Table C-4 in Appendix C of this ROD and will be discussed further in an Explanation of Significant Difference (ESD). The ESD will be incorporated in the Administrative Record for Sites 1 and 3. The movement of material from Sites 5 and 6 will not occur until after the ESD is issued."

## NOTES

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1. All requirements pertaining to groundwater should be deleted since groundwater was not characterized for impact by asbestos, the contaminant of concern.
2. The Clean Air Act was deleted since this is a program that has been delegated to the state. In cases of delegated programs, only the equivalent state regulations are identified as ARARs.
3. All references to RCRA Subtitle C should be deleted since there is no hazardous waste at Sites 5 and 6.
4. General worker safety regulations (i.e., OSHA requirements not dealing directly with asbestos) are not identified as ARARs. Only public health and environmental regulations are considered when determining ARARs. While these requirements may still apply to work performed to implement the ROD they should not be considered when selecting a remedy.
5. Maine Hazardous Waste Management Rules should be deleted for the same reason outlined in Note #3.
6. Maine Establishment of Air Quality Regions and Maine Standards for Classification of Minor Drainages should not be identified as ARARs since they provide classifications only and do not include regulatory standards.

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Note: Delete all hatched areas.

TABLE C-1  
 CHEMICAL-SPECIFIC ARARS, CRITERIA, ADVISORIES, AND GUIDANCE FOR SITES 5 AND 6  
 ROD: SITES 5 AND 6  
 NAS BRUNSWICK

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	Action To Be Taken To Attain CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
<b>GROUNDWATER/SURFACE WATER</b>				
<u>Federal</u>	Safe Drinking Water Act (SDWA) - Maximum Contaminant Levels (MCLs) (40 CFR Part 141.11 - 141.16)	Relevant and Appropriate	MCLs have been promulgated for several common organic and inorganic contaminants. These levels regulate the concentration of contaminants in public drinking water supplies, but may also be considered relevant and appropriate for groundwater aquifers used for drinking water.	To assess the potential risks to human health due to consumption of groundwater, contaminant concentrations were compared to their MCLs.
	SDWA - Maximum Contaminant Level Goals (MCLGs) (40 CFR Part 141.50 - 141.51)	Relevant and Appropriate	MCLGs are health-based criteria to be considered for drinking water sources as a result of the Superfund Amendments and Reauthorization Act. MCLGs are available for several organic and inorganic contaminants.	The 1990 National Contingency Plan states that non-zero MCLGs are to be used as goals. Contaminant concentrations in groundwater were compared to their MCLGs.
<u>Federal Guidance and Criteria To Be Considered</u>	U.S. Environmental Protection Agency (USEPA) Risk Reference Doses (RfDs)	To Be Considered	RfDs are considered the levels unlikely to cause significant adverse health effects associated with a threshold mechanism of action in human exposure for a lifetime.	USEPA RfDs were used to characterize risks due to noncarcinogens in various media.
	USEPA Cancer Slope Factors (CSFs)	To Be Considered	CSFs represent the most up-to-date information on cancer risk potency available from USEPA's Integrated Risk Information System.	USEPA CSFs were used to compute the individual incremental cancer risk resulting from exposure to certain compounds.

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TABLE C-1  
CHEMICAL-SPECIFIC ARARS, CRITERIA, ADVISORIES, AND GUIDANCE FOR SITES 5 AND 6

ROD: SITES 5 AND 6  
NAS BRUNSWICK

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MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
<u>State</u>	Maine Drinking Water Rules (10-144A CMR Chapters 231-233)	Relevant and Appropriate	Maine's Primary Drinking Water Standards are equivalent to federal MCLs. Maine Maximum Exposure Guidelines have been promulgated for several contaminants. When state levels are more stringent than federal levels and have been legally and consistently applied, the state levels may be used.	Primary drinking water standards were used during the Remedial Investigation for purposes of comparison to groundwater analytical data and to evaluate the extent of groundwater contamination.
<u>AIR</u> <u>Federal</u>	Clean Air Act (CAA) - National Primary and Secondary Ambient Air Quality Standards (40 CFR Part 50)	Applicable	Primary ambient air quality standards define levels of air quality to protect public health. Secondary ambient air quality standards protect public welfare from known or anticipated adverse effects from pollutants.	The particulate standard for matter less than 10 microns is 150 µg/m <sup>3</sup> , 24-hour average concentration. This standard applies to excavation activities.
<i>Move to Action-specific</i>	CAA - National Emission Standards for Hazardous Pollutants (NESHAPs) (40 CFR Part 61)	Relevant and Appropriate	<p>NESHAPs are promulgated for emissions of particular air pollutants, <sup>including asbestos</sup> for specific sources.</p> <p>NESHAPs are generally not applicable to Superfund activities because CERCLA sites do not usually contain one of the specific source categories regulated; however, they may be relevant and appropriate and should be considered during development of the final remedy.</p>	The NESHAP requirements for <del>notification</del> , emission limits, and personnel training for the handling and disposal of asbestos (Subpart M) are relevant and appropriate to activities conducted at Sites 5 and 6. <i>The actions taken under the remedial action will meet these requirements.</i>

\*Insert "A" here.

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INSERT A

Emissions of asbestos fibers are regulated under Subpart M of 40 CFR Part 61. This regulation includes requirements for inactive waste disposal sites for asbestos mills and manufacturing and fabricating operations, for active waste disposal sites, and for waste disposal for demolition and renovation operations. It does not include requirements for inactive waste disposal sites like Sites 5 and 6 which were for demolition and renovation operations. Therefore, the NESHAP will not be "applicable" to cleanup of Sites 5 and 6. However, the regulation is "relevant and appropriate" to the control of asbestos fiber emissions at an inactive waste disposal site for demolition and renovation operations because the situation is sufficiently similar.

**TABLE C-1  
CHEMICAL-SPECIFIC AHARS, CRITERIA, ADVISORIES, AND GUIDANCE FOR SITES 5 AND 6**

**ROD: SITES 5 AND 6  
NAS BRUNSWICK**

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
<u>Federal Criteria and Guidance to be Considered</u> <u>State</u>	<del>Establishment of Air Quality Regions (38 MRSA, Section 583; MEDEP Regulations, Chapter 114)</del>	<del>Relevant and Appropriate</del>	<del>The Metropolitan Portland Air Quality Region is Class II.</del>	<del>Remedial actions should not result in the degradation of air quality classification.</del>
	Maine Ambient Air Quality Standards (38 MRSA, Section 584; MEDEP Regulations, Chapter 110)	Applicable	This Chapter establishes ambient air quality standards that are maximum levels of a particular pollutant permitted in the ambient air.	The standard for particulate matter is 150 $\mu\text{g}/\text{m}^3$ , 24-hour average concentration, which applies to excavation activities.

**Notes:**

- ARAR = Applicable or Relevant and Appropriate Requirement
- CAA = Clean Air Act
- CFR = Code of Federal Regulations
- CMR = Code of Maine Rules
- CSF = Cancer Slope Factor
- MCL = Maximum Contaminant Level
- MCLG = Maximum Contaminant Level Goal

- MEDEP = Maine Department of Environmental Protection
- MRSA = Maine Revised Statutes Annotated
- RfD = reference dose
- SDWA = Safe Drinking Water Act
- USEPA = U.S. Environmental Protection Agency
- $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter

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Place "Insert B" here

TABLE C-2  
LOCATION-SPECIFIC ARARS, CRITERIA, ADVISORIES, AND GUIDANCE FOR SITES 5 AND 6

ROD: SITES 5 AND 6  
NAS BRUNSWICK

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
<b>WETLANDS/FLOODPLAINS</b>				
<u>State</u>	Maine Natural Resources Protection Act (38 MRSA, Section 480-A through S)	Applicable	This act outlines requirements for certain activities adjacent to any freshwater wetland greater than 10 acres or with an associated stream, brook, or pond adjacent to a coastal wetland. The activities must not unreasonably interfere with certain natural features, such as natural flow or quality of any waters, nor harm significant aquatic habitat, freshwater fisheries, or other aquatic life.	Remedial activities regulated under this act <del>must</del> <sup>will</sup> meet activity standards. Substantive requirements of these regulations must be met by any action taken within 100 feet of a wetland or stream.
	Natural Resources Protection Act, Permit by Rule Standards (Maine Department of Environmental Protection [MEDEP] Regulations, Chapter 305)	Applicable	This rule <del>outlines</del> <sup>s</sup> prescribes standards for specific activities that may take place in or adjacent to wetlands and water bodies. The standards are designed to ensure that the disturbed soil material is stabilized to prevent erosion and siltation of the water.	Proposed activities involving disturbance of soil material within 100 feet of the normal high water line <del>would</del> be designed to incorporate all applicable standards.  will
<b>OTHER NATURAL RESOURCES</b>				
<u>State</u>	Maine Standards for Classification of Groundwater (38 MRSA, Section 470)	Applicable	This law requires the classification of the state's groundwater to protect, conserve and maintain groundwater resources in the interest of the health, safety, and general welfare of the people of the state.	Under the Maine standards, groundwater is classified as GW-A.

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TABLE C-2  
LOCATION-SPECIFIC ARARS, CRITERIA, ADVISORIES, AND GUIDANCE FOR SITES 5 AND 6

ROD: SITES 5 AND 6  
NAS BRUNSWICK

Insert B

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
SURFACE WATER <u>Federal</u>	Section 404(b)(1) Guidelines for Specifications of Disposal Sites for Dredged or Fill Material (40 CFR Part 230)	Relevant & Appropriate	No discharge of dredged or fill material is permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem so long as the alternative does not have other signif- icant adverse environmental consequences.	The remedial action does not involve a discharge of material to water or wetlands and construction activities will be designed to ensure that there will be no adverse impacts to aquatic ecosystems.

**TABLE C-2**  
**LOCATION-SPECIFIC ARARS, CRITERIA, ADVISORIES, AND GUIDANCE FOR SITES 5 AND 6**  
**ROD: SITES 5 AND 6**  
**NAS BRUNSWICK**

MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
	Maine Standards for Classification of Minor Drainages (38 MRSA, Section 468)	Applicable	These requirements set forth the classifications of surface water bodies within the State of Maine. Best usage and associated standards for protection of those usages are established under this regulation.	Remedial actions <del>should</del> <sup>will</sup> not result in the degradation of water quality classification.
	Maine Site Location Development Law and Regulations (38 MRSA Sections 481-490; MEDEP Regulations, Chapter <del>374-377</del> 315)	<del>Applicable</del> Relevant & Appropriate	This act and regulations govern <del>drilling for natural resources</del> <sup>development</sup> and include hazardous activities that consume, generate, or handle hazardous wastes and oil. Activities cannot adversely affect existing uses, scenic character, or natural resources in the municipality or neighboring municipality.	Remedial alternatives will be developed considering these regulations. A permit is not required for on-site activity.
Delete here. Already cited under action-specific.	Maine Solid Waste Management Rules: Landfill Disposal Facilities (38 MRSA, Section 1301 et seq.; MEDEP Regulations, Chapters 400-406)	Applicable	These regulations outline landfill siting requirements including minimum distances to aquifers, bedrock, and geologic faults.	The standards outlined in Chapter 404, construction and demolition landfills, are applicable to the remediation of Sites 5 and 6. The requirements set forth under this chapter will be incorporated into the closure of the Sites 5 and 6 waste disposal area.

The regulations provide that there be no unreasonable adverse effects on specified items (including air quality, runoff/infiltration relationships, surface water quality), no unreasonable alteration of climate or natural drainage ways, and provisions for erosion and sedimentation control and noise control.

**TABLE C-2  
LOCATION-SPECIFIC ARARS, CRITERIA, ADVISORIES, AND GUIDANCE FOR SITES 5 AND 6**

**ROD: SITES 5 AND 6  
NAS BRUNSWICK**

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MEDIA	REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
<u>State Guidance and Criteria To Be Considered</u>	Town Shoreland Zoning Ordinances and State Minimum Guidelines	To Be Considered	These minimum guidelines and town ordinances apply to activities proposed within 200 feet of a high-water mark of a stream or other body of water.	These guidelines will be considered in the siting of any treatment facilities.
<i>Delete unless these areas have been identified at or adjacent to Sites 5 &amp; 6</i>	Maine Critical Areas Program and Maine Natural Heritage Program	To Be Considered	These state programs and policies and regulations governing special habitats or communities.	Where such special areas exist, these state programs will become involved in the project and/or permit review process.
	Maine Critical Areas Act (5 MRSA 3310 through 3316)	To Be Considered	This nonregulatory legislation allows Maine agencies such as the Critical Areas Program and the Natural Heritage Areas Program to identify, research, and protect critical areas and endangered or threatened plants.	Where such special areas exist, these state programs will become involved in the project and/or permit review process.

- Notes:
- ARAR = Applicable or Relevant and Appropriate Requirements
  - CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act
  - CFR = Code of Federal Regulations
  - CWA = Clean Water Act
  - EO = Executive Order
  - MRSA = Maine Revised Statutes Annotated
  - MEDEP = Maine Department of Environmental Protection

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TABLE C-3  
ACTION-SPECIFIC ARARS, CRITERIA, AND GUIDANCE FOR SITES 5 AND 6

ROD: SITES 5 AND 6  
NAS BRUNSWICK

REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
<b>Federal</b>			
RCRA - Preparedness and Prevention (40 CFR Parts 264.30-264.37)	Relevant and Appropriate	This regulation outlines requirements for safety equipment and spill-control requirements for hazardous waste facilities. Part of the regulation includes a requirement that facilities be designed, maintained, constructed, and operated to minimize the possibility of an unplanned release that could threaten human health or the environment.	Safety and communication equipment will be available at the site during implementation of the final remedy. Local authorities will be familiarized with site operations.
RCRA - Contingency Plan and Emergency Procedures (40 CFR Parts 264.50-264.56)	Relevant and Appropriate	This regulation outlines the requirements for emergency procedures to be used following explosions, fires, etc.	Emergency plans will be developed and implemented during the final site remedy. Copies of the plans will be kept on-site.
RCRA - Closure and Post-closure (40 CFR Parts 264.110-264.120)	Relevant and Appropriate	This regulation details general requirements for closure and post-closure of hazardous waste facilities, including installation of a groundwater monitoring program.	Those parts of the regulation concerned with long-term monitoring and maintenance of the site will be considered during remedial design.
Occupational Safety and Health Act (OSHA) - General Industry Standards (29 CFR Part 1910)	Applicable	These regulations specify the 8-hour time-weighted average concentration for various organic compounds. Training requirements for workers at hazardous wastes operations are specified in 29 CFR Part 1910.120. <i>(including asbestos)</i>	Proper respiratory equipment will be worn if it is impossible to maintain the work atmosphere below the concentration. Workers performing activities would be required to have completed specific training requirements.
OSHA - Safety and Health Standards (29 CFR Part 1926)	Applicable	This regulation specifies the type of safety equipment and procedures <del>to be followed during site remediation</del> <i>for handling asbestos.</i>	All appropriate safety equipment will be on site. In addition, safety procedures will be followed during on-site activities.

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continue

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Delete & insert marked up NESHAP text from P.5

TABLE C-3 ACTION-SPECIFIC ARARs, CRITERIA, AND GUIDANCE FOR SITES 5 AND 6

ROD: SITES 5 AND 6 NAS BRUNSWICK

REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
OSHA - Recordkeeping, Reporting, and Related Regulations (29 CFR Part 1904)	Applicable	This regulation outlines the recordkeeping and reporting requirements for an employer under OSHA.	These requirements apply to all site contractors and subcontractors, and must be followed during all site work.
National Emission Standards for Hazardous Air Pollutants - Asbestos Removal (40 CFR Part 61, Subpart M)	Applicable	This regulation describes the minimum standards, procedure or action taken or used for removal, enclosure, or encapsulation of asbestos-containing material or the renovation, demolition, maintenance, or repair of facilities with asbestos-containing material.	Disposal of asbestos material at Site 5 may be required to conform to disposal regulations including a soil cover, fencing, and warning signs.
Asbestos Hazardous Emergency Response Act - Asbestos Regulation for Schools, Training, and Transportation (40 CFR Part 763)	Relevant and Appropriate	This regulation requires school districts to identify any and all asbestos-containing materials in their facilities and to develop management plans to control or eliminate asbestos-containing material. Standards are also specified for protection of construction workers, training requirements, and transportation and disposal of asbestos.	Although these regulations are specific to schools, portions may be relevant and appropriate to implementation of the final remedy at Site 6. Workers who are in contact with asbestos material may be required to conform to training requirements. Management plans are to be submitted to the state.

State Maine Solid Waste Management Rules including Maine Landfill Disposal Regulations for Construction/Demolition Debris, Inert Fill, Land Clearing Debris, and Woodwaste (MEDEP Regulations, Chapters ~~404~~ 400-404)

Applicable

These regulations outline requirements for ~~permitting, siting, design, operation, and closure of landfills to be used for the disposal of construction/demolition debris, inert fill, land clearing debris, and woodwaste.~~

Sites 5 and 6 can be classified as a construction/ demolition debris landfill; therefore, the closure of the waste disposal area must meet the minimum specifications outlined in Chapter 404.

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TABLE C-3  
ACTION-SPECIFIC ARARS, CRITERIA, AND GUIDANCE FOR SITES 5 AND 6

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ROD: SITES 5 AND 6  
NAS BRUNSWICK

Maine Solid Waste Management Rules:

REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
Management, Testing, and Disposal of Special Wastes (MEDEP Regulations, Chapter 405)	Applicable	Section 405.4 sets forth requirements that apply to the storage and disposal of asbestos wastes. , transport	These requirements <del>would</del> <sup>will</sup> pertain to activities conducted at <del>Site 6</del> Sites 5 and 6.
Maine Hazardous Waste Management Rules (MEDEP Regulations, Chapters 800-802, 850, 851, 853-857)	Relevant and Appropriate	The rules provide a comprehensive program for handling, storage, and recordkeeping at hazardous waste facilities. They supplement the RCRA regulations.	Only those regulations paralleling RCRA requirements identified above would pertain to the final remedy implemented at Sites 5 and 6. State requirements more stringent than federal requirements take precedence.
Maine Asbestos Abatement Regulations (MEDEP Regulations, Chapter 136)	Applicable	These regulations define requirements for the licensing of asbestos abatement contractor, worker, project supervisor, evaluation specialist, and design consultants, and outlines training courses for each job category. These regulations also specify the minimum work practice requirements for asbestos abatement contractors.	These requirements will apply to remedial activities at Sites 5 and 6.

Note:

- CFR = Code of Federal Regulations
- CMR = Code of Maine Regulations
- CWA = Clean Water Act
- DOT = Department of Transportation (U.S.)
- FIFRA = Federal Insecticide, Fungicide, and Rodenticide Act
- MEDEP = Maine Department of Environmental Protection
- MRSA = Maine Revised Statutes Annotated

- NAS = Naval Air Station
- NPDES = National Pollutant Discharge Elimination System
- OSHA = Occupational Safety and Health Administration
- POTW = publicly owned treatment works
- RCRA = Resource Conservation and Recovery Act
- µg/m<sup>3</sup> = micrograms per cubic meter

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ADDITIONAL ACTION-SPECIFIC ARARS, CRITERIA, AND GUIDANCE FOR SITES ~~5 AND 6~~ 1 AND 3  
 NECESSARY DUE TO ADDITION OF MATERIAL FROM SITES 5 AND 6  
 ROD: SITES 5 AND 6  
 NAS BRUNSWICK

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Actions To Be Taken To Attain ARARs

REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
<u>Federal</u>			
CAA - National Emission Standards for Hazardous Pollutants (NESHAPs) (40 CFR Part 61)	Relevant and Appropriate	* Use synopsis from revised Sites 5 & 6 table.	The NESHAP requirements for emission limits, and personnel training for the handling and disposal of asbestos (Subpart M) are relevant and appropriate to activities regarding the movement of asbestos material to Sites 1 and 3. Actions taken at Sites 1 and 3 will meet these requirements.
Occupational Safety and Health Act (OSHA) - General Industry Standards (29 CFR Part 1910)	Applicable	These regulations specify the 8-hour time-weighted average concentration for various organic compounds. Training requirements for workers at hazardous waste, including asbestos, operations are specified in 29 CFR Part 1910.120.	Proper <del>respiratory</del> respiratory equipment will be worn if it is impossible to maintain the work atmosphere below the concentration. Workers performing activities would be required to have completed specific training requirements.
OSHA - Safety and Health Standards (29 CFR Part 1926)	Applicable	This regulation specifies the type of safety equipment and procedures for handling asbestos	All appropriate safety equipment will be worn on site. In addition, safety procedures will be followed during on-site activities.

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TABLE C.1  
 ADDITIONAL ACTION-SPECIFIC ARARS, CRITERIA, AND GUIDANCE FOR SITES 1 AND 3  
 NECESSARY DUE TO ADDITION OF MATERIAL FROM SITES 5 AND 6  
 ROD: SITES 5 AND 6  
 NAS BRUNSWICK

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REQUIREMENT	STATUS	REQUIREMENT SYNOPSIS	CONSIDERATION IN THE REMEDIAL RESPONSE PROCESS
<u>State</u> Maine Solid Waste Management, Testing, and Disposal of Special Wastes (MEDEP Regulations Chapter 405)	Applicable	Section 405.4 sets forth requirements that apply to the storage, transport and disposal of asbestos wastes.	These requirements will pertain to activities involving disposal of asbestos materials at Sites 1 and 3.
Maine Asbestos Abatement Regulations (MEDEP Regulations, Chapter 136)	Applicable	These regulations define requirements for the licensing of asbestos abatement contractors. These regulations specify the minimum work practice requirements for asbestos abatement contractors.	These requirements will apply to remedial activities at Sites 1 and 3.