

# Lepage Environmental Services, Inc.

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March 4, 2002

Mr. Orlando J. Monaco  
Code 1821 LM  
Department of the Navy, EFANE  
10 Industrial Highway, Mail Stop 82  
Lester, PA 19113-2090

Subject: February 2002 Draft *Proposed Remedial Action Plan for Site 7*

Dear Mr. Monaco:

The following comments on the February 2002 Draft *Proposed Remedial Action Plan for Site 7* (PRAP) are submitted on behalf of the Brunswick Area Citizens for a Safe Environment (BACSE):

**1. General Comment.** BACSE concurs with the majority of the Maine Department of Environmental Protection's (MEDEP) comments as stated in the agency's February 25, 2002 letter, and given the time constraints for finalizing the PRAP, BACSE will only reiterate those comments that need particular emphasis.

**2. Groundwater Neutralization Option.** In the MEDEP's second General Comment (dated 2/25/02), the agency suggested that the Navy should consider the option of neutralizing groundwater acidity to aid re-adsorption of cadmium, which could provide a permanent solution for the groundwater contamination. This option could be considered as a third alternative in the PRAP. BACSE would also support the Navy's consideration of this alternative as it could lead to a permanent solution. However, because of the time constraints (the push to finalize the PRAP in the late spring and complete the Record of Decision shortly thereafter), BACSE doesn't believe that it is possible to thoroughly evaluate a neutralization alternative before the PRAP is finalized. BACSE suggests perhaps appropriate wording be added to the PRAP and ROD stating that, within a certain timeframe (say, six months from the date of ROD signing) the Navy will complete an evaluation of the groundwater neutralization option. This would allow the Navy more time to consider the option. If the Navy decides to proceed with the option, perhaps an Explanation of Significant Differences, rather than an entirely new ROD, could be implemented. If the Navy decides the option is not worth pursuing, the ROD and the remedy remain unchanged. This approach has been used successfully at Portsmouth Naval Shipyard, where the evaluation of excavation and replacement with a constructed wetland of the Operable Unit 3 landfill and construction was included in the ROD. The Navy recently completed the evaluation and is pursuing the option.

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**3. Page 1, Introduction.** The Navy uses “limited” to describe groundwater monitoring in this section and elsewhere in the PRAP. BACSE recommends removing the “limited” qualifier because it is confusing - “limited” compared to what? The details of monitoring will be spelled out in a monitoring plan to be developed in the future (this information should be added to the PRAP). Furthermore, if the Navy decides to pursue the groundwater neutralization option, or if cadmium levels start increasing over time, the monitoring might actually increase, at for a short time.

**4. Page 2, Site Map.** BACSE concurs with the MEDEP that the Institutional Controls boundaries should be shown on the site map. The public needs to understand the extent of the controls to be implemented.

**5. Page 3, The Proposed Remedial Action.** BACSE objects the use of qualifiers like “slightly” and “marginally” to describe contamination at the site. If the Navy wants to put things in perspective, actual concentrations should be compared with the actual federal Maximum Contaminant Levels and state Maximum Exposure Guidelines (MCLs, MEGs). Otherwise, BACSE agrees with MEDEP’s comments 9 and 10 that pertain to this section.

**6. Page 4, Summary of Investigations.** BACSE believes that it is important for the public to understand how the determination that groundwater had been adversely impacted at Site 7 was made (MEDEP comment 13b.). In addition to the suggestions made by the MEDEP in their comments 12 through 16, BACSE feels that the discussion of the Phase II investigation in the second column should clearly state that no definitive source for the cadmium has been identified to date (although the test pitting in the late 1908's revealed a layer of blue-gray crystals in two test pits believed to be acid salts resulting from liquid battery disposal and to represent the location of the old acid/caustic pit.). In fact, Section 3.1 of the November 2001 Site 7 Investigation Report indicates that the source of the cadmium appears to be both natural and anthropogenic.

**7. Page 4, Summary of Remedial Alternatives.** BACSE believes (and a 3/4/02 telephone conversation with Ms. Claudia Sait confirms) that the wording suggested in MEDEP comment 17 should be revised slightly. Groundwater should be monitored until concentrations of contaminants are consistently below the MCL and MEG.

**8. Page 5, Summary of Remedial Alternatives.** The changes MEDEP suggests in comment 18 for Table 1 (5-year reviews, wording on Institutional Controls) should also be made to the text below. The points made in MEDEP’s comment 20 are particularly important if the public is to understand Institutional Controls. BACSE believes that the standards for groundwater should be specifically identified in the description of Alternative 2. BACSE is also concerned that there is no discussion of what will happen if trend goes up, instead of down. What happens if the trend increases instead of decreases? The use of the term “natural attenuation” is a bit confusing, particularly given the definition at the end of the PRAP. BACSE is familiar with natural

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attenuation with regard to volatile organic compounds. However, additional information on natural attenuation for the inorganic contamination at Site 7 must be discussed in the PRAP.

**9. Page 5, Nine CERCLA Evaluation Criteria.** Criteria Number 4 in the second column should be revised so that it is clear to the public that the treatment technologies mentioned refer to man-made technologies, and not naturally occurring "treatment" (natural attenuation) of groundwater.

**10. Page 6, The Navy's Proposed Remedy.** BACSE suggests the last sentence in the first paragraph in the second column be changed to "... groundwater monitoring program to ensure that this contamination does not migrate and trends over time are documented.". The phrase "utilize permanent solutions" at the end of the second paragraph is not immediately apparent to the public and should be clarified.

Please do not hesitate to call me if you have any questions.

Sincerely,



Carolyn A. Lepage, C.G.  
President

cc: Loukie Lofchie, BACSE  
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