

Lepage Environmental Services, Inc.

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April 30, 2002

Mr. Orlando J. Monaco
Code EV21 LM
Naval Facilities Engineering Command, EFANE
10 Industrial Highway, Mail Stop #82
Lester, PA 19113-2090

Subject: March 2002 *Proposed Remedial Action Plan for Site 7*

Dear Mr. Monaco:

The following comments on the March 2002 *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 supports the Navy's proposed remedial action of groundwater monitoring and institutional controls for Site 7. BACSE looks forward to the results of the Navy's evaluation of different technologies, such as phytoremediation or groundwater neutralization, that might accelerate closure at the site.
- 2. Groundwater Contamination Trends.** As discussed at the April 9, 2002, Public Informational Meeting, given the recent removal action, the Navy is hoping that concentrations of groundwater contamination will decrease over time. However, as BACSE pointed out at the meeting, the likely trend is unknown, and might actually increase. What will the Navy do at Site 7 should contamination show an increasing trend over time?
- 3. Institutional Controls.** BACSE believes that implementing institutional controls at a site where contamination exceeds protection criteria is vital for protection of human health. Of particular concern is how institutional controls will remain effective as time passes, especially if the Navy sells or leases the base property. What are the specific institutional controls that will be implemented, and how will the Navy ensure that the controls remain effective in the future, including if the property is sold or leased?

4. Process for Implementing Technologies. Once the Navy completes the evaluation of technologies for accelerating site cleanup, what are the criteria for deciding which, if any, of the methods will be applied to Site 7? How much weight are costs given? What is the process for planning (Work Plan, etc.) and communicating with the regulators and the public? Will there be a public meeting? How will the Record of Decision be modified?

5. Phytoremediation. If the Navy chooses to implement phytoremediation at Site 7, what happens to the vegetation that takes up the contamination? For example, what do you do with the wood once trees have removed the contamination from the ground?

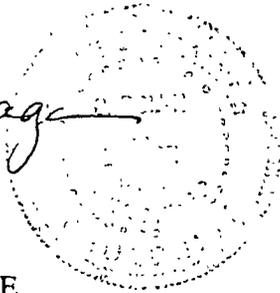
Please do not hesitate to call me if you have any questions.

Sincerely,



Carolyn A. Lepage

Carolyn A. Lepage, C.G.
President



cc: Loukie Lofchie, BACSE
Tom Fusco, BACSE
Ed Benedikt, BACSE
Anthony Williams, NASB
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✓ Al Easterday, EA ES&T