

P. O. Box 297
Brunswick, ME 04011
May 28, 1991

Captain H. M. Wilson
Commanding Officer
Naval Air Station Brunswick
Brunswick, ME 04011-5000

Re: Comments on Draft Focused Feasibility Study, Site 8.

Dear Captain Wilson:

The recommendations for Site 8 assume that PAHs in the soil are the only contaminants of concern. Yet we are left with one nagging observation of hexavalent chromium, in addition to elevated concentrations of Na, Pb, etc. It seems that route 24 may well be the origin of Na and Pb, but no explanation is presented for the Cr(VI). We are given little information on the nature of the material disposed here and what the source of Cr might be.

Some of the PAH numbers are difficult to understand. I can't reconcile the Carcinogenic PAH values given in Figs. 2-2 and 2-3. They are not consistent, but maybe I haven't examined the text carefully enough. The development of the boundaries for the >18 mg/kg level is based on very few data. Given the general range of the values, perhaps that's not critical.

Of the remedial options, 8C seems to provide a reasonable degree of protection. There is no evidence that 8D will increase the protection and the process of stirring up the contaminated soil may increase the risk. On the positive side, 8D might bring out the presence of hot spots that have not been picked up by the limited number of test pits.

If 8C is chosen, is there any thought of providing an additional measure of protection through visible posting or a fence? Something that goes beyond the deed restrictions.

cc: James Shafer

Sincerely,
Samuel S. Butcher
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