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**ROBERT G.
GERBER, INC.**

Consulting Geotechnical Engineers and Geologists

17 West Street • Freeport, Maine • 04032-1133

207-865-6138

October 28, 1992
File #965



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To	BETH WALTER	From
Co.	ABB	Co.
Dept.		Phone #
Fax #	207 772 4762	Fax #
		215 8976432

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

Subject: Comments on "Proposed Plan, Site 8, Perimeter Road Disposal Site",
September 1992, Naval Air Station Brunswick, Brunswick, Maine.

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc., has compiled comments on the "Proposed Plan, Site 8, Perimeter Road Disposal Site", dated September 1992, that was prepared by ABB Environmental Services, Inc., for the U. S. Department of the Navy for the Naval Air Station Brunswick, Brunswick, Maine. The comments provided below reflect the concerns voiced by BACSE members at the October 15, 1992 Public Meeting concerning the subject document. As we discussed in our telephone conversation today, written comments on the Site 8 Plan must be submitted to the Navy during the public comment period, which ends on October 31, 1992.

1. BACSE members are concerned that the institutional controls described in the proposed plan are not presented in sufficient detail to determine if there is adequate protection for area citizens once the Navy no longer operates the Naval Air Station Brunswick. The BACSE members request the Navy expand its description of the institutional controls, providing details on specific protective measures.
2. BACSE members request the Navy evaluate remedial alternatives requiring the removal of landfill materials from Site 8 to either another landfill on base property or to an appropriate offsite disposal facility. BACSE members are interested in minimizing the land area at the base that will be unavailable for future use once the Navy is no longer active at Naval Air Station Brunswick.
3. A BACSE member requests the Navy clarify where the agreement is that will guarantee proposed and accepted remedial measures will be implemented.
4. Area citizens are concerned with the potential long-term affects of Site 8 on water quality at the Jordan Avenue Wellfield. While the interpretation of current data indicates the two

Page 2, Site 8 Proposed Plan,
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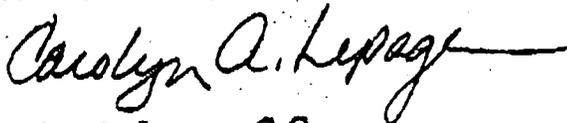
locations are not hydraulically connected, BACSE feels the long-term monitoring plan for Site 8 should be designed to test that hypothesis on a regular basis. Members are also concerned with the potential for any future land use changes in the area, such as construction, to affect groundwater flow from Site 8.

5. A BACSE member requests the Navy evaluate the potential for contamination by radioactive materials at Site 8. Of particular concern is the report in an area newspaper that nuclear weapons are stored at Naval Air Station Brunswick.

6. Several citizens have expressed concern that levels of parameters detected in surface water at Site 8 exceed ambient water quality standards, yet no action is proposed to remediate surface water quality. At what point will an increase in detected concentrations become a "problem" and trigger remedial action? BACSE members request that the Navy specify what the action levels will be for surface water.

If you have any questions concerning the comments above, please do not hesitate to give us a call.

Sincerely,
Robert G. Gerber, Inc.



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