

Attn: Beth Walter

**Brunswick Area Citizens for a Safe Environment**

P.O. Box 245 Brunswick, Maine 04011 (207)725-1330

May 26, 1993

To: Mr. James Shafer  
U.S. Army - Northern Division  
Fax 215-595-0555

Dear Mr. Shafer,

Enclosed please find review submitted  
to Brunswick Area Citizens for a Safe Environment  
by Robert G. Gocher, our consultant firm -  
As you requested, we are sending a copy of  
the report to Beth Walter at A B B -

Sincerely,

Ronnie Rogovin  
Secretary

**ROBERT G.  
GERBER, INC.***Consulting Geotechnical Engineers and Geologists*

17 West Street • Freeport, Maine • 04032-1133

207-865-6138

May 25, 1993  
File #965Ms. Loukie Lofchie  
Brunswick Area Citizens for a Safe Environment  
P. O. Box 245  
Brunswick, ME 04011Subject: Review of "Draft Record of Decision for a Remedial Action at Site 8,  
Naval Air Station Brunswick, Brunswick, Maine", May 1993.

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc., has reviewed the "Draft Record of Decision for a Remedial Action at Site 8, Naval Air Station Brunswick, Brunswick, Maine", dated May 1993. The document was prepared by ABB Environmental Services, Inc. (ABB) for the U. S. Department of the Navy for the Naval Air Station Brunswick (NASB), Brunswick, Maine. The Record of Decision (ROD) is intended to document the remedial action selected by the Navy to remediate the potential threat to human health and welfare or the environment. The current schedule calls for the draft Final ROD to be submitted for review by regulatory agencies on June 11, 1993, with the Final ROD submitted to the U.S. Environmental Protection Agency and the Navy for signature on July 20, 1993.

Site 8, also known as the Perimeter Road Disposal Site, is located at the northern end of the BNAS property adjacent to Route 24. The site was reportedly used from 1964 to 1974 as a disposal area for rubble, debris, and trash from BNAS. Solvents were also reportedly disposed at Site 8. As described in the subject document, the Navy now intends to remove the contaminated soil, construction debris, and rubble from Site 8. The material will be transported across NASB and disposed of as subgrade fill beneath the landfill cap at Sites 1 and 3.

We had provided you with comments on the February 1993 draft Proposed Plan and Technical Memorandum for remediation of Site 8 in our letter dated February 17, 1993. You subsequently sent our comments to the Navy. Several of the issues identified in our February 17, 1993 letter are still of concern to BACSE members. Our comments on the subject document are as follows:

1. **Pages 2 & 3.** The proposed alternative to excavate and move the material from Site 8 to Sites 1 and 3 meets one of BACSE's objectives to consolidate waste at the Base, thereby reducing the number of "sites" unavailable for future use should the Navy ever close the Base. However, the description of the selected remedy does not include either institutional controls or long-term monitoring. As we mentioned in our February 17, 1993, letter, if additional

Page 2, Draft Record of Decision, Site 8,  
File #965, May 25, 1993

contaminants are discovered during the excavation of Site 8, additional monitoring and/or land-use restrictions may be required.

2. Page 60-63. The description of the remedial components includes confirmation sampling once excavation of Site 8 is complete. However, because of the uncertainty regarding the exact nature of the wastes disposed at Site 8, there remains concern that additional contaminants might be discovered during the excavation process. What is the Navy's plan for evaluating potential contaminants during the excavation of Site 8? How will the material be evaluated during the removal process to determine if the confirmation sampling plan developed during the design phase is adequate to confirm no site-related contaminants are left in place?

3. Page A-4. In response to earlier comments raised by BACSE members concerning the potential for contamination by radioactive hazards, the Navy stated that the contractor performing the work will address monitoring of radioactive hazards in a "Safety, Health, and Environmental Response Plan", or SHERP. While the Navy's response indicates that regulators and the Technical Review Committee members would be advised should radioactive material be discovered at Site 8, there does not appear to be a provision to evaluate the adequacy of the monitoring proposed in the SHERP. BACSE members request the opportunity to review the specifics of the SHERP, such as the instrument(s) proposed, frequency of monitoring, and other details.

Please do not hesitate to give us a call if you have any questions on the comments above.

Sincerely,  
Robert G. Gerber, Inc.

*Carolyn A. Lepage*

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

*Andrews L. Tolman*

Andrews L. Tolman, C. G.  
Chief Hydrogeologist

