



STATE OF MAINE

# DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NAS BRUNSWICK  
5090.3a

JOHN R. McKERNAN, JR.  
GOVERNOR

DEAN C. MARRIOTT  
COMMISSIONER

DEBRAH RICHARD  
DEPUTY COMMISSIONER

June 25, 1993

Mr. James Shafer  
Project Manager, Code 1821  
Department of the Navy, Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mailstop 82  
Lester, Penn. 19112-2090

Dear Jim:

The Maine Department of Environmental Protection has received and reviewed the Draft Final Record of Decision For A Remedial Action at Site 8 Naval Air Station, Brunswick, Maine, dated June 1993. The Department's comments are provided below.

1. Meghan Cassidy has informed me that by statute the Department is not entitled to a signature page. Please remove the signature page that you have provided for the Department's signature.

2. p. 24. Third paragraph, last sentence.  
"for surface soil" should be added after the word  
"concentration" in this sentence.

3. p.24. Fourth paragraph.  
The State of Maine's Guidance of  $1 \times 10^{-5}$  for carcinogenic risk is exceeded for PAH's in the surface soils at this site. Please include this sentence in this paragraph.

4. p.26. First paragraph.  
Please justify your conclusion that because cadmium was not found at elevated levels in soils at the site, and was found at elevated levels in groundwater, that the elevated soil levels are attributable to geologic conditions at the site.

5. p. 38. Last paragraph.  
Please remove all references to this landfill as a construction debris landfill. This is not considered a construction debris landfill under Chapter 401 Rules.

6. p.42. Site Preparation.  
The Navy must meet the standards of the Natural Resources Protection Act to prevent soil from washing into the stream. These erosion controls will include whatever is necessary to prevent unreasonable siltation of the stream. Timing for the excavation should be included in this section. All

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excavation work should be performed during dry periods of summer and early fall to avoid erosion and siltation of the stream and to allow a good vegetation catch on exposed soils.

Please call me if you have any questions or comments.

Sincerely,



Nancy Beardsley  
Federal Facilities Project Manager  
Office of the Commissioner

cc: Meghan Cassidy USEPA  
Jim Carruthers NAS Brunswick  
Carolyn Lepage R.G. Gerber Inc.  
Beth Walter ABB ES ✓  
Rene Bernier Topsham  
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