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Consulting Geotechnical Engineers and Geologists

**ROBERT G.
GERBER, INC.**

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June 25, 1993
File #965

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

Subject: Review of "Draft Final 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 Final Record of Decision for a Remedial Action at Site 8, Naval Air Station Brunswick, Brunswick, Maine", dated June 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 Final ROD to be submitted to the U.S. Environmental Protection Agency, the Maine Department of Environmental Protection, and the Navy for signature on July 27, 1993.

Site 8, also known as the Perimeter Road Disposal Site, is located at the northern end of the NASB property adjacent to Route 24. The site was reportedly used from 1964 to 1974 as a disposal area for rubble, debris, and trash from NASB. Solvents were also reportedly disposed at Site 8. As described in the subject document, the Navy 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 May 1993 draft ROD for Site 8 in our letter dated May 25, 1993 (copy enclosed). You subsequently sent our comments to the Navy. The Navy responded to BACSE's comments in a letter from Elizabeth Walter of ABB to James Shafer of the Navy's Northern Division dated June 10, 1993, which we have also enclosed. As you will note in their June 10th response, the Navy has recognized BACSE's concerns regarding the possibility that hazardous materials might be discovered during excavation of Site 8, and has stated that the presence of these materials may warrant additional action, such as long term monitoring, depending on the results of the confirmation sampling. The Navy has provided a more detailed description of the confirmation sampling in their June 10, 1993 response, and has also stated that BACSE will have an opportunity to review the Safety Health and Environmental Response Plan that will provide specific information concerning monitoring for radioactive and other hazards at the site.

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

Our comments on the subject document are as follows:

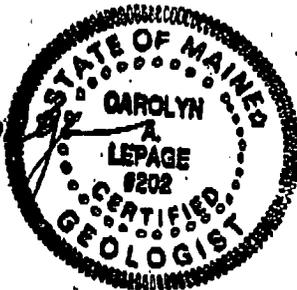
1. Page 13 and A-1. The text should be revised to indicate that BACSE is currently a member of the TRC, but has not been an active participant since the TRC was formed in early 1988.
2. Pages 42-45. In their June 10, 1993, response to BACSE's May 25, 1993 comments, the Navy acknowledged that additional measures, such as long term monitoring, might be required if confirmation sampling indicated the presence of hazardous materials. However, neither the remedial components described on pages 42-45, nor briefer descriptions of the remedial alternative elsewhere in the ROD mention this possibility. BACSE requests that the ROD include a statement that the potential for long term measures does exist, and that it depends upon the nature of the materials excavated and the results of the confirmation sampling.
3. Pages 42-45. The Navy stated in their June 10th response that soils that appeared to be contaminated, or materials that were unanticipated, would be sampled during the excavation of Site 8. The description of the remedial components in the ROD should include this information, and the criteria for observing and evaluating the excavated materials should be clearly spelled out and reviewed by TRC representatives prior to the beginning of excavation activities.
4. Page 45. The description of the confirmation sampling component states that the confirmation sampling plan will be developed during the design phase. Since the excavation activities, when "unanticipated materials" may be discovered, will take place well after the design phase, there should be a provision to modify the confirmation sampling plan appropriately to confirm that no site-related contaminants, including those not anticipated during the design phase, are left in place. The confirmation sampling plan is also described as being submitted for regulatory review and comment. Is approval by the regulatory agencies also required? BACSE members request that TRC representatives have an opportunity to review the confirmation sampling plan as well.
5. Page 45. The Grading and Seeding component should also include followup inspections to check the progress of site revegetation once seeding and mulching are completed.

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



Enc.

**ROBERT G.
GERBER, INC.**