

**ROBERT G.
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September 1, 1994
File #965

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

Subject: *Review of Draft Final Interim Record of Decision for the Groundwater Operable Unit at Site 9, Naval Air Station Brunswick, Brunswick, Maine, August 1994.*

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc. (Gerber), has reviewed *the Draft Final Interim Record of Decision for the Groundwater Operable Unit at Site 9, Naval Air Station Brunswick, Brunswick, Maine, dated August 1994*. The document was prepared by ABB Environmental Services, Inc., (ABB-ES) for the U. S. Department of the Navy for the Naval Air Station Brunswick (NAS Brunswick) located in Brunswick, Maine. In the subject document, the Navy presents the interim remedial action they selected to address groundwater contamination at Site 9.

Site 9, also known as the Neptune Drive Disposal Site, is located in the central portion of NAS Brunswick. The site initially included three areas of potential contamination: the location of a former incinerator and an associated ash disposal area; an area reportedly used for burning and disposal of solvents; and two streams exhibiting iron-staining characteristic of leachate. Results of earlier environmental investigations were reported in the August 1990 *Draft Final Remedial Investigation (RI)* and the April 1991 *Draft Final Supplemental RI* reports prepared by E. C. Jordan. The September 1993 *Draft Technical Memorandum for Site 9* presented a summary of investigations and analysis conducted through 1993, and recommendations for future activities at the site. Several of the issues we raised in our review of the September 1993 and earlier versions of the Technical Memorandum have been broached at subsequent meetings of the Technical Review Committee, and remain outstanding.

L. Lofble, Page 2 of 3, Site 9 Draft Final Record of Decision
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We recently reviewed the July 1994 *Proposed Plan for Site 9* that presented the Navy's preferred alternative for an interim remedial action for groundwater at Site 9. The proposed interim action includes groundwater remediation by natural attenuation, implementation of institutional controls to prevent human exposure, and long-term monitoring of groundwater, surface water, and sediments to evaluate changes in environmental quality. We presented our comments on the *Proposed Plan* in our letter to you dated August 10, 1994. The Navy recently provided responses to comments on the *Proposed Plan* received during the public comment period in a "Responsiveness Summary" that will be included in Appendix A of the final *Record of Decision* or ROD. We also reviewed the *Draft Final Long Term Monitoring Plan, Site 9, Neptune Drive Disposal Site*, dated August 1994, and provided our comments to you in our letter dated August 19, 1994.

Our comments on the draft final *Record of Decision* are as follows:

1. **Page 1.** The first sentence under the "Statement of Basis and Purpose" heading should be revised to reflect that the interim remedial action selected includes institutional controls in addition to long term monitoring and remediation of groundwater by natural attenuation.
2. **Pages 3 & 4.** Captain Rachor's name should be changed to the new Commanding Officer's name. In addition, Appendix C, which will include the Maine Department of Environmental Protection's letter of concurrence, should be referenced on both signature pages.
3. **Page 7.** A brief explanation, similar to the response to comment 2 in the "Responsiveness Summary", regarding why the old drain is a concern should be included.
4. **Pages 11 & 12.** The final paragraph of Section IIB should reference the "Responsiveness Summary" in Appendix A following the discussion of the July 1994 *Proposed Plan* and Public Hearing.
5. **Page 29.** The listing and description of the interim remedial action components presented here should be similar to that on page 36 in that it should include groundwater remediation through natural attenuation.
6. **Page 36.** The discussion of the estimated time of 0.70 years for a water particle to travel "through Site 9" should be revised to reflect that it's an estimate for the travel time for water in the vicinity of Neptune Drive to discharge to the stream (see Page 28).

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We are enclosing a complete copy of the "Responsiveness Summary" and the "Administrative Record Index" that will be incorporated as Appendix A and B, respectively, in the final ROD as you only received the August 19, 1994 cover letter from ABB-ES. In the "Responsiveness Summary", the Navy has responded to BACSE's concerns regarding evaluating contaminated stream sediments in the vicinity of Site 9 and conducting the additional investigations at Site 9 in a timely fashion.

Sincerely,
Robert G. Gerber, Inc.

Carolyn A. Lepage

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



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**ROBERT G.
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