



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

N60087.AR.000808
NAS BRUNSWICK
5090.3a

ANGUS S. KING, JR.
GOVERNOR June 4, 1999

EDWARD O. SULLIVAN
COMMISSIONER

Mr. Emil Klawitter
Code 1823 EK
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

Re: Draft Final Proposed Remedial Action Plan for Site 9

Dear Mr. Klawitter:

The Department of Environmental Protection (DEP or Department) has reviewed the Draft Final Proposed Remedial Action Plan (PRAP) for Site 9, dated May 1999 (May 26, 1999 version). The draft final PRAP is much better. The Department's earlier comments have been responded to satisfactorily except for a couple of items outlined below.

Specific comments:

1. Figure 1:

The Navy has overlooked adding the location for LT-901 on figure 1. (The symbol has been added to the legend.)

2. Figure 1 shows MW-NASB-77 as inactive. The continued monitoring of this well is still being discussed and will be resolved as part of revising the Long Term Monitoring Plan. The Department believes it will recommend continued monitoring at this well so it should shown as active.

3. Page 3, Proposed Remedial Action, Bullet 3:

Is the dash and indentation for the second comment intentional?

4. Page 7, Alternative 2, Para 2:

As stated earlier, since the Navy acknowledges that the type of waste disposed of in the ash landfill is unknown and may have included solvents, paint sludge and possible Metal Shop wastes; the inference that only ash is in this landfill is unacceptable. Also the Department does not want to limit monitoring at this time and feels it is more appropriate to deal with this matter in the Long Term Monitoring Program. Therefore Department recommends the following changes:

"Should NAS Brunswick ever close and/or transfer this property, EPA and MEDEP shall be notified and appropriate wording shall be included in the necessary real estate documents to prevent disturbance of buried ash landfill without regulatory review and approval. In addition, this alternative would require the development of a Long-Term Monitoring Program to ensure that the ash remaining in the landfill is not impacting the environment. Groundwater downgradient of the inactive landfill

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 764-1507

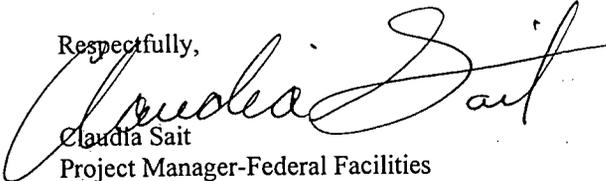
would be monitored ~~for metals~~ to assess whether the landfill is impacting groundwater and/or has the potential to impact surface water.”

5. Page 7 & 8:

The reference to the State Maximum Contaminant Guidelines should be State Maximum Exposure Guidelines. This must be changed in Table 1 (page 7) under the comment column for remedial alternative 2 and 3. The correction must also be made in definition (page 8).

Thank you for the opportunity to review this report. If you have any questions or comments please call me at (207) 287-7713.

Respectfully,



Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

Cf: File
Larry Dearborn-DEP
Anthony Williams-BNAS
Michael Barry-EPA
Carolyn LePage-LePage Environmental
Peter Nimmer-EA
Susan Weddle-BACSE