



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI

DAWN R. GALLAGHER

GOVERNOR July 21, 2005

COMMISSIONER

Mr. Orlando Monaco  
Department of Navy  
Engineering Field Activity-Northeast  
Code 1823/OM  
10 Industrial Highway, Mailstop 82  
Lester, PA 19113-2090

Re: Site 9, Soil Removal Action FFP  
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP) has reviewed the draft "Site Work Plan, Site 9 Soil Removal Action FFP", dated July 6, 2005, prepared by Oak Environmental Consultants, Incorporated. Based on that review MEDEP has the following comments and issues.

**General Comments:**

1. This document lacked the critical information on the removal of the ash landfill/dump. This information must be provided for review and comment as part of the workplan.
2. Please submit figures of the location of site 9 and the limits of the proposed removal action.
3. The workplan must include a section on groundwater is to be handled if it is encountered during the removal action.
4. Through this document "soil removal" is referenced. The removal action is for the ash landfill and dump material. MEDEP recommends clarifying that ash, debris and soil will be removed as part of this removal action.

**Specific Comments:**

5. Title Page:

a.) The title should clearly define the work proposed therefore MEDEP suggests the following title: *Site 9 Ash Landfill/Dump Removal Action*.

b.) If the FFP acronym is important to the title it must be written out.

6. "Statement of Work, para 1:

"In addition, concrete pads and utility lines in the area of the project will be removed and/or capped as part of the excavation activities."

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It is MEDEP's understanding that the barracks were removed down to their concrete pads. If this is correct then the pads for the old barracks must be removed in order to fully excavate the ash landfill and dump. If the concrete pads for the barrack had all ready been removed please identify what concrete pads are being discussed.

7. Laboratories, Table:

MEDEP does not have clean up levels by these titles: "MEDEP Soil Cleanup Limits and MEDEP Soil Criteria for Direct Contact". Therefore the actual reference must be cited for MEDEP to evaluate the appropriateness.

8. Method To Stockpile Soil, bullet 2:

"There are no drainage ditches, culverts, or other surface drainage features currently identified in the area."

The term "area" needs to be defined, because there is a drainage area and impoundment ponds within the area designated as Site 9. However the head of the drainage area is approximately 140 feet from the ash landfill/dump. Please clarify this bullet.

9. Confirmatory Samples:

This section needs to address where, what type of sample and how the sample will be taken.

10. Unanticipated Waste:

MEDEP was pleased to see that the contractor address the potential for unexploded ordnance. No response required.

11. ACM

a.) "This will be particularly important for the portion of the project involving abandonment of utility lines since older utility materials have a greater potential for containing ACM."

This statement seems outside the scope of this removal action. Please explain.

b.) "Further handling of the materials will be based on the findings of the asbestos inspector."

Please reference the rules and regulations which will govern the handling of the asbestos containing material.

12. Detailed Schedule:

Figure 1 was not included; please provide.

13. Spill Prevention and Response:

"All spills will be reported to the Navy and addressed as required by Maine DEP requirements."

Please reference the rules and regulations which govern the reporting and handling of spills in the State of Maine.

14. HASP:

MEDEP requires that a Health and Safety Plan be included as part of the workplan however MEDEP is not responsible for enforcing the Health and Safety Plan. However MEDEP made the following observation in regards to this HASP. (No response required.)

15. Section 4.1, Potential Chemical Hazards:

This section refers to the MCP soil standards. MEDEP is unfamiliar with this acronym please define.

16. Section 4.4, List of Potential..., Bullet 4:

The last sentence is incomplete.

17. Appendix B, Material Safety Data Sheets:

Diesel Range Organics and Gasoline Range Organics MSD sheets are included however none of the MSD sheets for the Contaminants of Concern, VOCs, ash (dioxins) etc are included. These must be included in this section.

18. Attachment C, Tables:

MEDEP could not review the appropriateness of these tables since it is unclear what these tables represent. Please put the appropriate title on them."

Thank you for the opportunity to review this report. If you have any questions or comments please call me at (207) 287-7713 or email me at [claudia.b.sait@maine.gov](mailto:claudia.b.sait@maine.gov).

Respectfully,



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