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RC
GERBER, INC.

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Attn: James Shafer
Code 142

January 28, 1992
File #965

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

Subject: Review of "Draft Site Evaluation Plan, Building 95", November 1991,
prepared by ABB Environmental Services, Inc.

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc. has reviewed the "Draft Site Evaluation Work Plan, Building 95", dated November 1991, that was prepared by ABB Environmental Services, Inc. for the U. S. Department of the Navy. It is our understanding that the work plan was developed to comply with the RCRA (Resource Conservation and Recovery Act) closure order signed by the Maine Board of Environmental Protection (BEP) on May 22, 1991. Because we have not reviewed the closure order, we are unable to determine if the work plan complies with the BEP's conditions. Instead, we have focused our review on the technical components of the work plan. Our comments are as follows:

- ✓ 1. Page 3-3. How and where will the fluids generated during decontamination be disposed? It is unclear in Section 3.5 if the fluids will be disposed at each contamination-reduction area. If that is the case, what are the criteria for determining if on-site disposal is proper? Will there be any testing?
- ✓ 2. Page 3-4. What is "non-nuisance manner" of disposal for fluids and soils generated during the field work?
- ✓ 3. Page 4-3. The rationale for the number (approximately 37) and location of soil sampling locations is unclear. Why was a regularly-spaced sampling grid that does not touch on identified sources (the dumping and mixing areas) selected? According to Section 4.3.2, up to five soil samples will be taken at each location. However, the criteria for determining the depths and number of samples at a TerraProbe location are not spelled out. Section 4.3.2 also specifies that 5 percent of the total soil samples will be selected randomly for laboratory analysis. The rationale for random selection, rather than focusing on "hot spots" of contamination, is not discussed.
4. Page 4-6. Because the area has not been the subject of previous field studies according to Section 4.4, field screening should include evaluation of radioactive hazards.

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WHY

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→ 5. Page 4-6, 4-9. It is unclear, based on the information in Section 4.4.1, how complete the reconstruction of historical activities at the site is. For example, is there enough information to determine that there has only been one dumping area, one drum rack area, and one mixing area since pesticide storage and handling began at the site? Will additional sources of information concerning activities at the Building 95 site be investigated?

✓ Which is correct? What are the criteria for sample selection?

→ 7. Page 4-9. What is in the two other "non-related storage buildings" located nearby and shown on Figure 4-1? Have they ever been used for storage or handling of pesticides, herbicides, or other compounds of concern?

✓ 8. Page 4-10. What is the round cross-hatched area just northwest of the drum rack on Figure 4-2?

→ 9. Page 4-11. According to the work plan, chemicals and water were usually mixed on the front steps of the building. The term "usually" implies that other mixing locations were used. Where are these locations? If the historic information does not indicate other specific mixing locations (or dumping areas), is the proposed soil and groundwater sampling program sufficient to identify them? It is also unclear from the text where the container rinsing/crushing/disposal took place. The location(s) of these activities and

EG: 10. Page 4-10, 4-11, 4-12, 4-13. Significant concentrations of pesticides were observed 20 feet away from the building, based on the results of sampling conducted in September 1990, but no explanation of the possible transport mechanisms is provided. The "potentially different fate and transport" of pesticides and herbicides mentioned in the text should be fully evaluated to address potential spreading of contaminants both above and below the ground surface.

✓ 11. Page 4-16. The soil sampling grid shown on Figure 4-4 does not include sampling at the dumping location behind the building (see Figure 4-2) or at the front steps where some of the mixing took place. These locations must be sampled. An option would be a tighter grid spacing in these two areas, as well as at the known drum rack area along the eastern side of the building. The groundwater sampling locations indicated on Figure 4-4 do not appear to address water quality up-gradient of the facility, or down-gradient of the mixing or drum rack areas. Additional groundwater sampling must address these locations.

**ROBERT G.
GERBER, INC.**

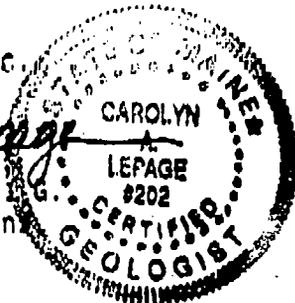
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- ✓ 12. Page 4-16, 4-17. What are the criteria for increasing or decreasing the soil and groundwater sampling grid spacings? The procedure for confirming the extent of pesticide contamination once non-detect soil concentrations are encountered is unclear.
- ✓ 13. Page 4-18. What are the criteria for selecting groundwater samples for confirmatory laboratory analysis?
- ✓ 14. Page 5-2. The Contract Required Quantitation Limits (CRQLs) exceed the Maximum Contaminant Levels (MCLs) for several of the compounds listed in Table 5-2. How will risks be evaluated and cleanup standards be developed if detection limits exceed Federal or State guidelines?
- EBA* 15. The Draft Work Plan addresses the field screening and sampling effort for removing contaminated soil, but makes no mention of the potential for other longer-term actions. For instance, if groundwater quality at or adjacent to the site is found to be impaired, what are the plans for installation of monitoring wells and implementation of a groundwater monitoring plan?

Please do not hesitate to give me a call if you have any questions concerning the comments above.

Sincerely,
Robert G. Gerber, Inc.

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



**ROBERT G.
GERBER, INC.**