

S T A T E O F M A I N E

DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF HAZARDOUS MATERIALS AND SOLID WASTE CONTROL

MEMORANDUM

TO: Mark Hyland, Federal Facilities Director
FROM: *MH* Marianne Hubert, Engineer, Technical Services
DATE: September 18, 1992
SUBJECT: Building 95, Engineering Evaluation/Cost Analysis,
Naval Air Station, Brunswick

I have reviewed the Brunswick Naval Air Station Draft Engineering Evaluation/Cost Analysis for Building 95 as prepared by ABB Environmental Services under contract with the US Department of the Navy and which you submitted to me for review on September 1, 1992.

The Navy has presented in this report a site evaluation and the identification and evaluation of removal action alternatives for Building 95 and area which was used to store, transfer and use pesticides and herbicides.

In general the report was well prepared and complete. I evaluated the document's engineering sections in more detail and found very few omissions or errors.

My comments are as follow:

1. No plan is proposed to remediate the groundwater known to be contaminated with DDT because it will never act as a source of water supply for the area (p.2-54, Section 2.2.1.4, Risk Characterization, Ingestion of Groundwater). Should the State accept this decision? ABB should present an evaluation of feasible approaches to remediate the groundwater.

2. P.3-4, Section 3.1, Alternative-Soil Cover, Removal of Structures. Following the cleaning of structures, it is proposed to dismantle, and dispose of the structures in a local construction debris landfill. However, the material being disposed of shall be fully decontaminated to be accepted in a general landfill; otherwise it shall be treated as a hazardous material and shall be disposed of in a landfill licensed to accept hazardous wastes. Testing

sections of the known contaminated material in the structures after cleaning shall be necessary to select the appropriate disposal procedure.

3. P.3-5, Section 3.1, Alternative-Soil Cover, Regrading. The proposed cover system does not require a 3 percent slope as it is not designed to prevent infiltration. Prevention of low areas against ponding by grading the cover material surface to establish a 2 foot cover over the contaminated area should be sufficient unless ponding is presently an existing condition for this site.

4. P.3-22, Section 3.3, Alternative 3-Excavation and on-Site Solvent Extraction, Treatability Study. To evaluate the most effective method of soil washing for solvent extraction, both proposed method, CF System and Best shall be used for a bench-scale treatability study. Then both methods shall be evaluated and one selected for the higher level of Treatability certainty.

5. Attachment A, Notice of Information to Justify a Treatability Variance. The treatability variance request shall be evaluated based on the information and results provided by the bench scale study performed by both methods.