



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

January 6, 1997

Mr. Philip Otis
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: EPA Comments on the Revised Draft Final Proposed Plan for Allen Harbor Landfill (Site 9),
dated 23 December 1996, at the former Naval Construction Battalion Center, Davisville,
Rhode Island (NCBC)

Dear Mr. Otis:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency (EPA) has reviewed the above-referenced document. Comments are enclosed.

We appreciate the Navy's efforts to provide a proposed plan (PP) that is in accordance with the general agreements that the BCT reached in the meeting which took place on December 13, 1996. Although EPA believes this PP is generally a workable document we have a number of significant comments that must be addressed before the PP is issued to the public. Therefore, please fax me redlined change pages. To aid you in responding to some of our comments, particularly the ones on the Comparison of Alternatives section, we are enclosing a sample fact sheet form PP which has recently been issued at another federal facility.

We continue to look forward to working with the BCT toward remedy selection at this site. Please feel free to call me if you have any questions concerning this letter. My phone number is (617) 573-5736.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine A.P. Williams".

Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

Enclosures



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Marilyn Cohen, ToNK
Bryan Wolfenden, RI RC&D, Inc.
Marjory Meyers, Narragansett Indian Tribe
Jim Shultz, EA Eng.

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1. Page 1, second column, second sentence. Rewrite this sentence to state, "This Proposed Plan addresses concerns that the conditions at Site 09 pose an unacceptable risk to human health and the environment."
2. Page 1, second column, second bullet. Change the text from "an impermeable liner" to "two impermeable layers" in order to conform to the RCRA "C" capping guidelines.
3. Page 1, second column, second bullet. After the words "landfill cover", in the first line of this bullet, insert the words: "which will meet the substantive requirements of the federal Resource Conservation and Recovery Act (RCRA) Subtitle C regulations."
4. Additionally, comment # 94 from EPA letter dated September 4, 1996 was not addressed in this version of the PP. "FS Chapter 4, section 4.5.1.1, Multimedia Cap and Figure 2-2; EPA does not use the term geocomposite to describe the flexible membrane liner (FML) or the geomembrane liner (GM) that should be included in the design of a RCRA "C" cap. Please change the term to either a FML or a GM. The second half of the low permeability layer that is required in the design of a RCRA "C" cap is the low permeability soil layer or an equivalent geocomposite clay liner (GCL). Please change both the text and the figure to be consistent with EPA requirements." The Revised Draft Final PP should also be changed within the text and within the figures.
5. Page 2, first column, fourth bullet and p.7, first bullet. The Town of North Kingston has noted a desire to use the completed landfill cap area for bike and hiking trails. A fence on the eastern side of Sanford Road would preclude any indicated reuse of the capped area. The Navy should exhaust the gas in only 1 or 2 locations and construct fencing around the few manifolds in order to facilitate reuse. Additionally, change the words "deed notifications" to "land use restrictions which may include deed restrictions".
6. Page 2, first column, fifth bullet. The NCP and 40 CFR 264 does not put a time-limit on the amount of monitoring needed during a remedial action. Remove the words "for up to 30 years" and re-word to read, "Conduct long-term monitoring of groundwater, sediment, and shellfish quality; and"
7. Page 2, first column, sixth bullet. The damaged culvert may not need replacement, due to the resultant probable change in the salt content of the freshwater wetland upgradient from the landfill.
8. Page 2, first column. Put the first sentence concerning the public meeting in Bold to attract attention to the date and times.
9. Page 2, second column, second sentence. Change the sentence to read, "You do not have to

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be a technical expert to comment - the Navy wants to hear your comments before making a final decision.”

10. Page 2, second column, second paragraph, first sentence. Change the sentence to read, “During the comment period, the public is invited to review the documents and correspondence which support the Proposed Plan.”

11. Page 2, second column. Change the heading to the box to read, “Documents are available for review at the following locations:”

12. Page 3, first column, second bullet. Bold face the text within the parenthesis.

13. Page 3, second column, first paragraph, third sentence. The “reported 2-ft soil cap” may have included contaminated soils or may have placed discontinuously. The conclusions of the Allen Harbor EEZ evaluation of the ERA indicate moderate to high risks to omnivorous small mammals such as the short-tailed shrew feeding in habitat associated with landfill soils, particularly from metals and PCBs. Remove the words, “and a reported 2-ft Soil Cap was placed over the fill materials.”

14. Page 3, second column. Change the word, “Findings” to “Results”

15. Page 3, second column. These results may be more readable in a table format with the contaminants and a check mark if they are above risk levels.

16. Page 3, second column last sentence and first sentence on p.4, first column should be moved to the discussion of “Risk Evaluations” for consistency.

17. Page 4, first column, first paragraph, third sentence. Remove the words after the semi-colon (“however the Navy’s computer models and geostatistical analysis support the conclusion that shallow and deep ground water do not contribute to the elevated COC concentrations in the harbor sediment or surface water.”) EPA does not agree with these statements. See EPA comment letters on the RI/FS and geostatistical evaluation dated, 10-12-95, 10-20-95, 2-26-96, 9-4-96, 9-10-96, and 12-11-96.

18. Page 4, first column, first paragraph, sixth sentence. Remove the words, “are primarily” and replace with “may be”, as the COC concentrations may be elevated due to a combination of forces that are working on the landfill.

19. Page 5, first column, bullets 1 & 2. These bullets are conclusions from the Marine ERA, no conclusions from the Terrestrial ERA EEZ evaluation were included in this section as was requested in the previous EPA comments on the Allen Harbor Landfill PP comments. Portion of

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Comment # 33 from EPA letter dated 8-29-96 was not addressed in this version of the PP. "...The Administrative Record shows that the ecological community on and near the landfill is at moderate to high risk. As suggested by NOAA in the letter to the EPA and Navy dated 8-28-96 the bullets in this section should be changed to state that the risk to the health of the subtitle area of Allen Harbor may be low, but the ecological communities near the landfill are at moderate risk. Additional bullets should be added to describe the risks to the terrestrial receptors, such as:

- Potential risks to terrestrial wildlife from existing site conditions (e.g., contaminants in soils and sediment) were examined in the Facility-Wide Freshwater and Terrestrial ERA performed in support of the RI. The conclusions of the Allen Harbor EEZ evaluation of the ERA indicate moderate to high risks to:

carnivorous, wading birds such as the great blue heron feeding in marine marshes and intertidal habitats, particularly from PCBs, pesticides and metals;

omnivorous small mammals such as the short-tailed shrew feeding in habitat associated with landfill soils, particularly from metals and PCBs;

carnivorous small mammals such as the mink feeding in aquatic habitat associated with marine marshes, particularly from PCBs, PAHs and metals.

20. Page 6, column 1, second sentence. Remove the words, "geocomposite liner". Replace with either a GM or FML and a compacted clay liner or a GCL". See above comment.

21. Page 6, column 1, line 21. Replace the words "deed notification" with "land use restrictions which may include deed restrictions".

22. Page 6, column one, first paragraph, last sentence (line 24). Insert, insert the following sentence after the last sentence under Alternative 3:

It should be noted that the Navy believes that the multi-media cap itself will be sufficient to reduce the risk from COC at the site. If during the required long term monitoring under this alternative, it is determined that capping alone has not reduced site risks to acceptable levels, the Navy will be required to take additional measures, (such as barrier walls or other appropriate measures).

23. Page 6, column 2, second paragraph, second sentence. In the spirit of cooperation, the EPA has decided to allow the Navy to attempt to prove that the vertical barriers are not required to reduce the risk from COC at the site. If during the required long term monitoring it is determined that capping alone has not reduced site risks to acceptable levels, the Navy will be required to

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implement additional controls. Therefore, insert the words, "The Navy believes that" before the words, "vertical barriers".

24. Page 6-7, "Comparison of Alternatives." A more detailed comparison of the alternatives is required, including a summary of whether or not they meet the nine criteria. For example, it should be noted that Alternative 4 (the soil cap) does not meet ARARs because it does not meet the requirements of RCRA Subtitle C. See EPA comments 110-124 in the FS comment letter dated September 4, 1996. Attached is a sample proposed plan in the fact sheet format. The level of detail contained in this proposed plan for the "Comparison of Alternatives", including the comparison chart, should be used in the Allen Harbor proposed plan. The chart would have plain circles for all of the first 5 criteria for the No Action alternative and a filled in circle for the implementation criteria. The Alternative 2 - Soil Cap would have half-filled in circles for the first, third, fourth, and fifth criteria; with a plain circle on the second and a filled in circle for the sixth criteria. The Alternative 3 - Multimedia Cap and Alternative 4- Multimedia Cap with Vertical Barriers would have filled in circles for all six criteria noted in the chart. Cost would be as noted in the revised PP. EPA's preferred alternative would be Alternative 3 - Multimedia Cap.

25. Page 6, column 2, second paragraph, third and fourth sentences and p.7, first column, first and second sentences. Remove all these sentences. EPA does not agree with the Navy's interpretation of the RI results. See above comments.

26. Page 7, first column, second paragraph, first sentence. Remove the sentence and replace with the following, "The Navy believes that the primary migration pathway for COC from the landfill to shoreline sediment is through site erosion and overland runoff, which will be controlled by the landfill cap and shoreline stabilization. This cap will also eliminate infiltration and will reduce leachate generation."

27. Page 8, Glossary, *Geocomposite liner*. Remove this definition since the EPA does not use this term. See above comments for replacement terms.

28. Page 9, Glossary, *Multimedia Cap*. Cap constructed in accordance with RCRA "C" guidelines contain two low permeability layers. Remove the words, "a low-permeability layer" and replace with "two low permeability layers". See above comments.

29. Page 9, Glossary, *Remedial Alternative*, line 2. Insert the words "lead agency and" before the word EPA.

30. Page 9, Glossary, *Resource Conservation and Recovery Act*, line 2. Delete the words "enacted in 1976" and insert the word "Federal" before "legislation".

31. Figure 3. Remove the term geocomposite liner or equivalent and include two low

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permeability layers per RCRA "C" requirements. See above comments.

32. Add a comment sheet for the public to tear off and send back to Phil.



The Loring IRP Proposed Plan

FINAL
May 1996
The Loring Air Force Base
Installation Restoration Program

No Further CERCLA Action and Minimal Action for Operable Unit 4

Introduction

The Installation Restoration Program (IRP) is being conducted to clean up environmental contamination at Loring Air Force Base (LAFB). This Proposed Plan recommends the preferred alternative for Operable Unit 4 (OU 4). OU 4 (Figure 1) is the groundwater associated with Landfill 1 (LF-1), Landfill 2 (LF-2), Landfill 3 (LF-3), the Coal Ash Pile (CAP), and the Chapman Pit Debris Area (CPDA) sites. OU 4 is located in the western portion of LAFB.

The Air Force is proposing No Further Action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for groundwater at LF-1, and CPDA. The Air Force is also proposing Minimal Action for groundwater at LF-2 and LF-3/CAP. The components of the Minimal Action alternative are described on Page 3. The public is encouraged to comment on the preferred alternative for OU 4 (see Page 5 for details):

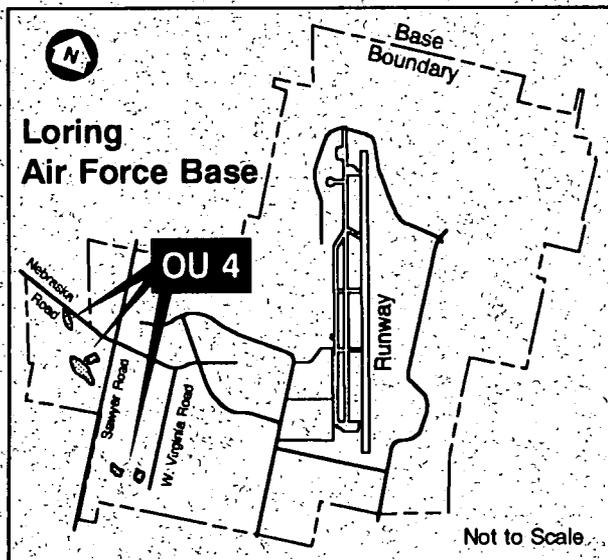


Figure 1: Operable Unit Location

Some History

Constructed in the late 1940s, the primary mission of LAFB was to support long-range bomber aircraft for the Strategic Air Command. Principal base operations included aircraft maintenance, refueling, munitions storage and maintenance, and flightline operations. Many of these activities required storage, use, and disposal of materials and compounds containing hazardous substances. As a result of these activities, hazardous substances entered the environment.

LAFB was listed on the National Priorities List in 1990. A Federal Facilities Agreement (FFA) between the U.S. Environmental Protection Agency (USEPA) Region I,

Technical terms shown in bold are defined in the glossary on Page 6.

the Maine Department of Environmental Protection (MEDEP), and the U.S. Air Force (USAF), signed on January 30, 1991, as amended, governs environmental activities being conducted at LAFB. The Air Force is responsible for addressing environmental contamination at LAFB, under Section 120 of CERCLA and the FFA. In 1991, LAFB was placed on the Base Closure List. The Base was closed in September 1994.

Sites at LAFB are organized into OUs according to geographic location, disposal type (e.g., landfill), or affected media (e.g., groundwater). OU 4 is the groundwater operable unit for LF-1, LF-2, LF-3, CAP, and CPDA. Landfill contents and soils associated with these five sites were studied separately from OU 4. LF-2 and LF-3 source areas are in OU 2, LF-1 and CAP source areas are in OU 2A, and the CPDA source area is in OU 3.

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IRP activities to date include a **Remedial Investigation (RI)** to characterize the distribution of groundwater contamination, and a **Feasibility Study (FS)** to develop remedial alternatives.

A **Risk Assessment** was conducted as part of the RI to identify potential risks to human health and the environment. The Risk Assessment evaluates the present and potential future risks to human health and the environment posed by existing conditions, assuming no remedial action is taken. Both cancer and noncancer risks were evaluated.

The USEPA acceptable risk range is an estimated lifetime cancer risk associated with site contamination which falls within the range of one in ten thousand to one in one million (10^{-4} to 10^{-6}). Noncancer risks are evaluated by calculating a Hazard Index (HI). If the HI is less than or equal to 1, no adverse health effects are anticipated from the predicted exposure level. If the ratio is higher than 1, the predicted exposure level could potentially cause adverse health effects.

Findings of Field Investigations

CPDA and the LF-1 are located west of West Virginia Road (Figure 2) and LF-2, LF-3, and the CAP are located just west of the West Gate (Figure 3). The following paragraphs summarize the Source Areas which may have impacted OU 4.

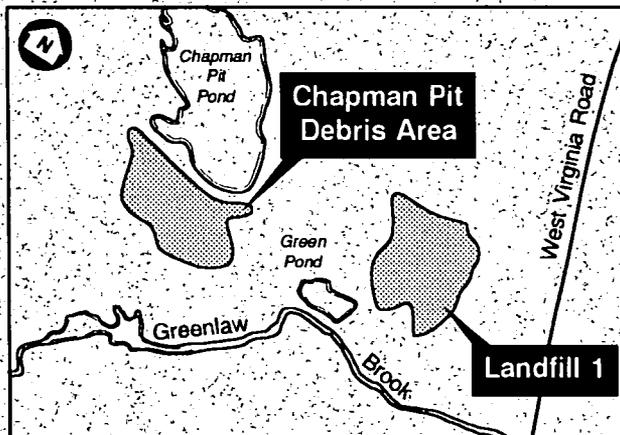


Figure 2: Locations of Landfill 1 and the Chapman Pit Debris Area.

The *Chapman Pit Debris Area* (OU 3 Source Area) is located west of West Virginia Road and south of Chapman Pit Pond. The area was mined for its sand and gravel during construction of the Base. The pit was enlarged when an earthen dam was created from soil near the pit. Old construction equipment and construction debris were stored in the pit and old concrete and asphalt pavement were temporarily piled there. Results of the groundwater investigation indicate calculated risks do not exceed the USEPA target risk range or hazard index. Therefore, the Air Force recommends No Further Action under CERCLA for groundwater at the CPDA. Surface water and sediment

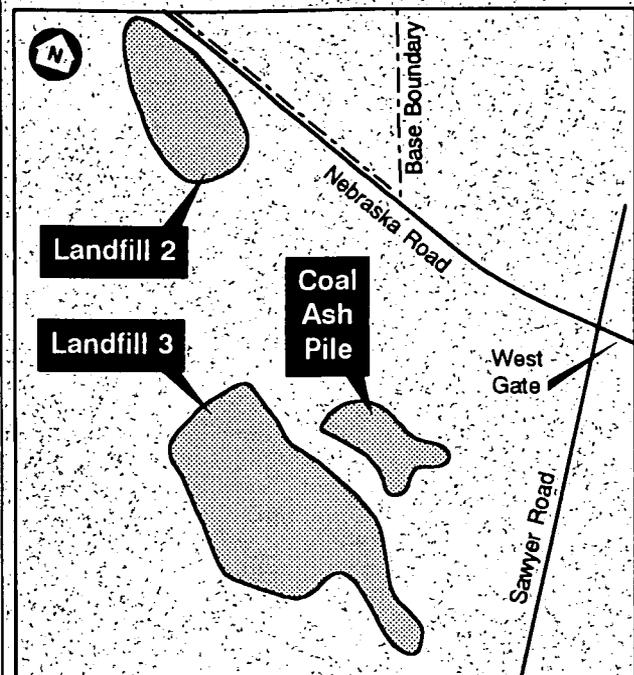


Figure 3: Locations of Landfill 2, Landfill 3, and the Coal Ash Pile.

at the CPDA are being evaluated as part of OU 13, the basewide surface water drainage operable unit.

Landfill 1 (OU 2A Source Area) is located west of West Virginia Road and southeast of Chapman Pit Pond. The area was used as a gravel pit during runway construction. The excavated area, approximately 3.3 acres, was used primarily for the disposal of construction debris (e.g., concrete blocks, brick, and wood) from 1952 to 1956.

The results from OU 2A RI activities at the site indicated no unacceptable risk to receptors from landfill soils and therefore, no further action under CERCLA is required. However, a soil cover system consistent with the MEDEP Solid Waste Regulations will be installed over the landfill in 1996. The OU 4 FS concludes that risks do not exceed the USEPA target risk range or hazard index for groundwater associated with LF-1. Therefore, the Air Force is proposing No Further Action under CERCLA for groundwater at LF-1.

Landfill 2 (OU 2 Source Area) is located south of Nebraska Road and west of Sawyer Road and the West Gate. This area also was excavated for sand and gravel prior to being used for a landfill. The landfill operated from 1956 to 1974 for base refuse and flightline wastes. Approximately 300,000 cubic yards of wastes are buried in LF-2. In 1994 and 1995 nonhazardous contaminated soils and debris from removal actions were placed as subgrade for the cover system.

A cover system has been designed consistent with state and federal regulations. The cover system will eliminate direct exposure to the landfill contents and reduce the potential of groundwater contamination by eliminating rainwater infiltration. The cover system will be completed in 1996.

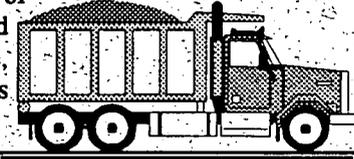
Calculated risks for overburden groundwater do not exceed the USEPA target risk range or hazard index. Chlorinated solvents and inorganic contamination has been detected in bedrock groundwater. The calculated risks only slightly exceed the USEPA target risk range or hazard index. Therefore, the Air Force is proposing Minimal Action for groundwater at LF-2.

Landfill 3 (OU 2 Source Area) is located west of Sawyer Road and south of Nebraska Road and the West Gate. This area was also excavated for sand and gravel prior to being used for a landfill. The landfill operated between 1974 to 1991 for domestic garbage from base housing and flightline areas. Over 350,000 cubic yards of wastes are buried in LF-3. In 1994 and 1995 nonhazardous contaminated soils and debris from removal actions were placed as subgrade for the cover system. A cover system has been designed consistent with state and federal regulations and will be completed in 1998.

The groundwater investigation at LF-3 detected chlorinated solvents and fuel contamination in both overburden and bedrock groundwater. The calculated risks only

slightly exceed the USEPA target risk range or hazard index. Therefore, the Air Force is proposing Minimal Action for groundwater at LF-3.

The *Coal Ash Pile* (OU 2A Source Area) covered approximately 5 acres and was located northeast of LF-3. The Air Force conducted a removal action, in accordance with CERCLA, at the CAP in 1994 and 1995. Approximately 184,000 cubic yards of coal ash, contaminated soil, concrete rubble, miscellaneous debris



and refuse were removed from the area and placed at LF-2 and LF-3 as subgrade for the cover systems. Due to groundwater flow across the site, the CAP is included in the investigation for LF-3.

The calculated risks for LF-3/CAP groundwater only slightly exceed the USEPA target risk range or hazard index. Therefore, the Air Force is proposing Minimal Action for groundwater at LF-3/CAP.

Summary of Alternatives Considered for OU 4

Based on data collected, the Air Force recommends No Further Action under CERCLA for groundwater at LF-1 and the CPDA. Remaining closure activities for LF-1 will be completed in accordance with MEDEP Solid Waste Regulations. An FS evaluated remedial alternatives for groundwater at LF-2 and LF-3/CAP. The following table summarizes the remedial alternatives considered in the FS.

Remedial Alternatives Considered

Remedial Alternatives	Components	Comment
No Action	None	<ul style="list-style-type: none"> No additional efforts or cost beyond those detailed in the OU 2 ROD
Minimal Action	<ul style="list-style-type: none"> Institutional Controls <ul style="list-style-type: none"> Groundwater Use Restrictions Groundwater Monitoring Contingency Action Five-Year Site Reviews 	<ul style="list-style-type: none"> 30 years of reporting of system performance Cost = \$897,000 Domestic users of groundwater would be protected by institutional controls
Collection/Treatment/Discharge	<ul style="list-style-type: none"> All items listed in Minimal Action alternative Installation of extraction wells On-site treatment system Discharge of treated groundwater 	<ul style="list-style-type: none"> 5 to 30 year duration Costs - \$4,018,000 to \$5,945,000 Requires additional pre-design hydrogeological studies

Alternatives Evaluation Criteria

The following is a summary of the nine criteria used to balance the pros and cons of the remedial alternatives. The USEPA has already evaluated the alternatives against the first seven criteria. Once comments from the state and public are received, the USEPA will finish comparing the alternatives to select the cleanup remedy for OU4.

1. Overall protection of human health and the environment: The alternative should protect plant and animal life on and near the site.

2. Compliance with Applicable or Relevant and Appropriate Requirements (ARARs): The alternative should meet applicable and relevant and appropriate federal and state environmental statutes, regulations, and requirements.

3. Long-term effectiveness and permanence: The alternative should maintain reliable protection of human health and the environment over time.

4. Reduction of toxicity, mobility, or volume through treatment: CERCLA contains the statutory preference that the selected alternative should use a treatment process to permanently reduce the level of toxicity of

contaminants at a site, the spread of contaminants away from the source of contamination, or the amount of contamination at the site.

5. Short-term effectiveness: The alternative should minimize the short-term hazards to workers, residents, or the environment during implementation of the remedy.

6. Implementability: The alternative should be technically feasible, and the materials and services needed to implement the remedy should be readily available.

7. Cost: The alternative should provide the necessary protection for a reasonable cost.

8. State acceptance: The state environmental agencies should agree with the preferred alternative.

9. Community acceptance: Community acceptance of the preferred alternative is evaluated based on the comments received during the public hearing and public comment period.

Comparison of Alternatives

Nine Criteria	1 No Action	2★ Minimal Action	3 Collection/ Treatment/ Discharge
Protects human health and environment	○	●	●
Meets Federal and State requirements	○	●	●
Provides long-term protection	◐	●	●
Reduces mobility, toxicity or volume	◐	◐	●
Provides short-term protection	◐	●	●
Can be implemented	●	●	●
Cost (30 years)	\$0	\$0.9 M	\$5.9 M
State Agency Acceptance	To be determined after the public comment period		
Community Acceptance	To be determined after the public comment period		

- Does not meet criteria
- ◐ Partially meets criteria
- Meets or exceeds criteria
- ★ USEPA's preferred alternative

The Air Force's Preferred Alternative

The Air Force is proposing cleanup actions, where appropriate, in accordance with CERCLA. Protective landfill cover systems will be completed for LF-2 and LF-3 in 1996 and 1998, respectively. This action is expected to significantly reduce the amount of groundwater contamination that may be generated by waste at the site. However, because construction has not been completed, the effectiveness of the cover systems has yet to be realized.

Because the calculated risks for groundwater only slightly exceed the USEPA target risk range or hazard index, and migration of contaminants has not been detected in downgradient residential wells, the Air Force is proposing Minimal Action for LF-2 and LF-3/CAP. Additionally, installation of the landfill cover systems will reduce the amount of future groundwater contamination, which will alleviate the slight exceedance of the USEPA target risk range.

The Minimal Action alternative for LF-2 and LF-3/CAP will include institutional controls and groundwater monitoring. Institutional controls will be established to restrict groundwater use. Specific institutional controls and geographical limits will be defined in the Record of Decision (ROD). In addition, the Air Force will perform groundwater monitoring. Groundwater monitoring requirements for OU 4 will be integrated with OU 2 into a comprehensive monitoring program. The OU 4 ROD will outline the monitoring requirements and the details will be described in the Post-Closure Plan for OUs 2 and 4.

In accordance with CERCLA and USEPA guidance, the Air Force will review the selected remedy at least once every five years to ensure that the remedial action continues to be protective of human health and the environment. A contingency action will be implemented if landfill-related contaminants are detected at the compliance point at concentrations above preliminary remediation goals. If hook-up to public water supply or institutional controls on off-base property is necessary, the Air Force will take steps to evaluate the effectiveness of the LF-2 and LF-3 cover systems on groundwater migration, and if appropriate, modify the Minimal Action remedy.

The Minimal Action alternative will be protective of human health and the environment and comply with ARARs by monitoring groundwater quality and restricting the use of groundwater in the vicinity of the landfills within the base boundaries. The alternative will provide both short-term and long-term effectiveness. Although the alternative does not involve treatment, installation of the landfill cover systems will reduce the amount of groundwater contamination. The alternative is easily implemented, providing the necessary protection at a reasonable cost. The state has reviewed and preliminarily agreed to the preferred alternative. Final acceptance of the preferred alternative by the state agencies and the community will be determined after the public comment period.

The Public's Role in Alternative Selection

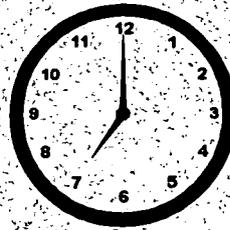
Community input is also considered as the Air Force and regulatory agencies select the remedial action, prior to the signing of the ROD. The public is encouraged to participate in the decision-making process.

This Proposed Plan for OU 4 is available for review, along with the supplemental documentation, at the

Air Force Base Conversion Agency Office
5100 Texas Road
Limestone, Maine
(207) 328-7109
Hours: 7:30 a.m. to 3:30 p.m., Monday through Friday

A public meeting and hearing will be held on Wednesday, June 11, 1996 at 7:00 p.m. at

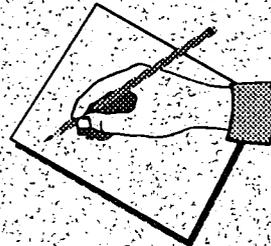
Caribou City Hall
High Street
Caribou, Maine



At the meeting, the Air Force, in coordination with the U.S. EPA and the Maine DEP, will present the preferred alternative described in this Proposed Plan. Upon completion of the presentation, public questions will be addressed.

A public comment period will be conducted from May 17 to June 15, 1996. Opinions and comments may be forwarded in writing to:

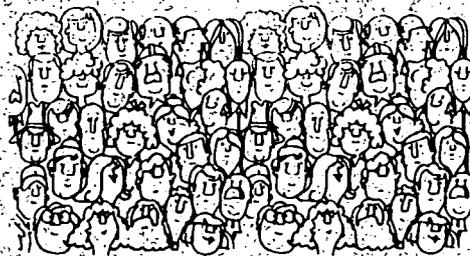
Peter Forbes
Remedial Project Manager
AFBCA/OL-M
RR 1 Box 1719
Limestone, Maine 04750



Verbal comments received at the June 11, 1996 public hearing and written comments received during the public comment period will be considered in the selection of the Preferred Alternative for OU 4. These public comments will be addressed in the Responsiveness Summary of the ROD.

For further information, please contact:

Peter Forbes
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AFBCA/OL-M
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Limestone, Maine 04750
(207) 328-7109



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Boston, Massachusetts 02203-2211
(617) 223-5503

Glossary of Technical Terms

Compliance Point: Sampling locations used to monitor compliance with remediation goals.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA): A federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act. In accordance with Section 120 of CERCLA, Federal Facilities are required to investigate and clean up abandoned or uncontrolled hazardous waste sites.

Cover System: A multi-layer capping system typically used for closure of landfills.

Feasibility Study (FS): A CERCLA process of identifying and evaluating cleanup alternatives.

Installation Restoration Program (IRP): The Department of Defense program implemented at military bases to investigate and clean up contamination from past operations.

Institutional Controls: Legal requirements established to restrict use or access.

National Priorities List: The EPA's list of the most serious uncontrolled or abandoned hazardous waste sites.

Operable Unit (OU): The separate units into which a site may be divided for investigation and/or cleanup.

Record of Decision (ROD): A public document that explains which cleanup alternatives will be used at the site.

Remedial Investigation (RI): An in-depth study to gather the necessary data to determine the nature and extent of contamination at a site, and to support the Feasibility Study.

Removal Action: Short-term immediate action taken to address releases of hazardous substances that require expedited response.

Responsiveness Summary: Part of the Record of Decision that outlines public comments and concerns about the remedial alternatives and provides responses to them.

Risk Assessment: A calculated estimate of the potential for adverse health impacts due to exposure to contaminants.



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