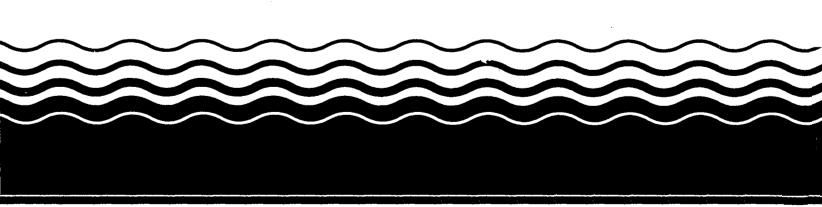
PB95-963102 EPA/ESD/R01-94/098 January 1995

EPA Superfund Explanation of Significant Difference for the Record of Decision:

Loring Air Force Base, Operable Unit 6, ME 9/30/1994



FINAL

RAILROAD MAINTENANCE SITE OPERABLE UNIT 6 EXPLANATION OF SIGNIFICANT DIFFERENCES

September 1994



Installation Restoration Program
Loring Air Force Base, Maine

DECLARATION FOR THE EXPLANATION OF SIGNIFICANT DIFFERENCES

SITE NAME AND LOCATION

Railroad Maintenance Site, Operable Unit 6 Loring Air Force Base (LAFB) Limestone, Maine

STATEMENT OF PURPOSE

This decision document sets forth the basis for the determination to issue the attached Explanation of Significant Differences (ESD) for Operable Unit 6 at the Loring Air Force Base Superfund Site in Limestone, Maine.

STATUTORY BASIS FOR ISSUANCE OF THE ESD

Under Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), if the lead agency determines that the remedial action at a Site differs significantly from the Record of Decision (ROD) for that Site, the lead agency shall publish an explanation of the significant differences between the remedial action being undertaken and the remedial action set forth in the ROD and the reasons such changes are being made. The National Contingency Plan (NCP) (40 CFR 300.435 (c)(2)), and EPA guidance (OSWER Directive 9355.3-02), indicate that an ESD, rather than a ROD amendment, is appropriate where the changes in issue do not fundamentally alter the overall remedy with respect to scope, performance, or cost. Because the adjustments to the remedial action do not fundamentally alter the overall remedy for the Operable Unit 6 with respect to scope, performance or cost, this ESD is being issued properly.

In accordance with the NCP (40 CFR 300.435(c)(2)(i)(A)), this ESD will become part of the Administrative Record which is available for public review at both the LAFB Base Conversion Agency Office and the Robert A. Frost Memorial Library, in Limestone, Maine. In addition, a notice that briefly summarizes this ESD will be published in the Aroostook Republican and Bangor Daily News.

OVERVIEW OF THE ESD

OU 6 consists of six sites: Railroad Maintenance Site (RRMS), East Gate Waste Storage Tanks Site (EGWST), and four Fuel Drop Sites (North 1, North 2, South-Active, and South-Former). The OU 6 CERCLA Record of Decision issued in April, 1994 provided that there would be a CERCLA remedial action for the RRMS and

that there would be no action under CERCLA at the other five sites. This ESD relates to the CERCLA remedial action at RRMS.

The RRMS contains approximately 200 yds³ of soil contaminated with polynuclear aromatic hydrocarbons (PAHs) which exceed acceptable CERCLA risk levels. The selected remedial action for the RRMS. included the following key components:

- mobilization and site preparation;
- excavation of contaminated surface and/or subsurface soil;
- disposal of excavated material in an off-base licensed landfill or treatment facility;
- restoration of the site; and
- site review, including confirmation sampling.

By this ESD, the Air Force, as lead agency, with concurrence from EPA and Maine Department of Environmental Protection is including, as part of the RRMS remedial action, the use of excavated material from RRMS as subgrade fill beneath the landfill cap to be constructed at the LAFB OU 2 landfills in lieu of off-base disposal/treatment of such material.

In July 1993, a Proposed Plan was issued outlining a preferred alternative for RRMS which included excavation of the contaminated soil and transporting it off-base disposal or treatment. The Proposed Plan also discussed an alternative which included use of the excavated material from RRMS as subgrade fill under a proposed cap to be constructed at the OU 2 landfills. This alternative would have cost approximately \$50,000 less than the preferred alternative. At that time, however, no Proposed Plan or Record of Decision for OU 2 proposing such a cap had been issued.

In July 1994 a Proposed Plan for OU 2 was issued which proposed a landfill cap as the preferred alternative for OU 2 with necessary subgrade fill being obtained from other areas on Loring AFB, including RRMS. The ROD for OU 2 based on this preferred alternative is expected to be issued concurrently with this ESD. The use of the material from RRMS as provided in this ESD is subject to this OU 2 ROD being issued.

The use of excavated material from RRMS as provided in this ESD as subgrade fill for the cap to be constructed at OU 2 does not fundamentally alter the overall remedy for OU 6 with respect to scope, performance or cost, and in fact will be more cost effective than the remedial action contained in the April 1994 ROD for OU 6.

DECLARATION

For the foregoing reasons, by my signature below, I approve the issuance of an Explanation of Significant Differences for Operable Unit 6 at Loring Air Force Base, in Limestone, Maine and the changes stated therein.

By:

Alan K. Olsen

Title: Director

Air Force Base Conversion Agency

DECLARATION

For the foregoing reasons, by my signature below, I approve the issuance of an Explanation of Significant Differences for Operable Unit 6 at Loring Air Force Base in Limestone, Maine and the changes stated therein.

Зу:

John P. DeVillars

Date 9 30 94

Title: Regional Administrator

US Environmental Protection Agency, New England

EXPLANATION OF SIGNIFICANT DIFFERENCES Operable Unit 6 LORING AIR FORCE BASE LIMESTONE, MAINE

I. INTRODUCTION

A. Site Name and Location

Site Name:

Operable Unit 6

Loring Air Force Base (LAFB)

Site Location:

Limestone, Maine

B. Lead and Support Agencies

Lead Agency:

United States Department of the Air Force

(Air Force)

Support Agencies:

United States Environmental Protection

Agency (EPA)

Maine Department of Environmental Protection

(MEDEP)

Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) §120(e)[42 USC § 9620(e)], the Air Force, EPA and MEDEP entered into a Federal Facility Agreement (FFA), dated January 31, 1991, amended December 1993, regarding the cleanup of environmental contamination of LAFB. The FFA sets forth the roles and responsibilities of each of the parties.

C. Legal Authority

Under CERCLA §117(a)[42 USC § 9617(c)], the National Contingency Plan (NCP) [40 CFR §300.435(c)], and EPA guidance (OSWER Directive 9355.3-02), if the lead agency determines that differences in the remedial action significantly change, but do not fundamentally alter the remedy selected in the Record of Decision (ROD) with respect to scope, performance, or cost, the lead agency shall publish an explanation of the significant differences between the remedial action being undertaken and the remedial action set forth in the ROD and the reasons such changes are being made.

D. Summary of this Explanation of Significant Differences (ESD)

The 1994 ROD for Operable Unit 6 (OU 6) at LAFB requires that the selected remedy for the Railroad Maintenance Site (RRMS) consist of soil removal and off-base disposal. The ROD for Operable Unit 6 also requires a No Action remedy under CERCLA for Fuel Drop Sites North 1 and 2, and Fuel Drop Site South-Active. In separate actions which are not part of this Record of Decision, the Air Force is taking non-CERCLA remedial actions at the East Gate Waste Storage Tanks Site and the Fuel Drop Site South-Former pursuant to state requirements. The actions are being taken pursuant to an Air Force/State Two-Party Supplement to the Federal Facility Agreement.

In July 1993, a Proposed Plan was issued outlining the preferred alternative for the RRMS consisting of excavating the contaminated soil and transporting it to an off-base, privately operated, special waste landfill or treatment facility licensed by the State of Maine. The material at the RRMS includes approximately 200 yds' of soil contaminated with polynuclear aromatic hydrocarbons which exceed the acceptable CERCLA risk levels. The Proposed Plan also discussed using the excavated material from the RRMS as subgrade fill for the OU 2 Landfill. This alternative was not selected in the OU 6 ROD because no ROD was signed selecting capping of the OU 2 landfills. The OU 2 ROD is expected to be issued concurrently with this ESD.

Since the OU 6 ROD indicates that using the excavated soils from the RRMS as subgrade fill would save approximately \$50,000 and 200 yds of subgrade would not have to be purchased, modifying the disposal decision to use the excavated soils from the RRMS as subgrade fill for the OU 2 landfill is a more cost effective alternative and equally protective of the environment. The Air Force has evaluated the soils from the RRMS and determined that the material is not hazardous, as defined by RCRA and is not subject to the RCRA Land Disposal Restrictions (40 CFR Part 268). Therefore, the RRMS soils may be used as subgrade fill at OU 2.

The use of excavated material from the RRMS as subgrade fill for the landfill cap at OU 2 does not fundamentally alter the overall remedy for OU 6 with respect to scope, performance or cost. Nor will these adjustments impact the other aspects of the OU 2 remedy: construction of a cap; long-term monitoring; and institutional controls and land-use restrictions.

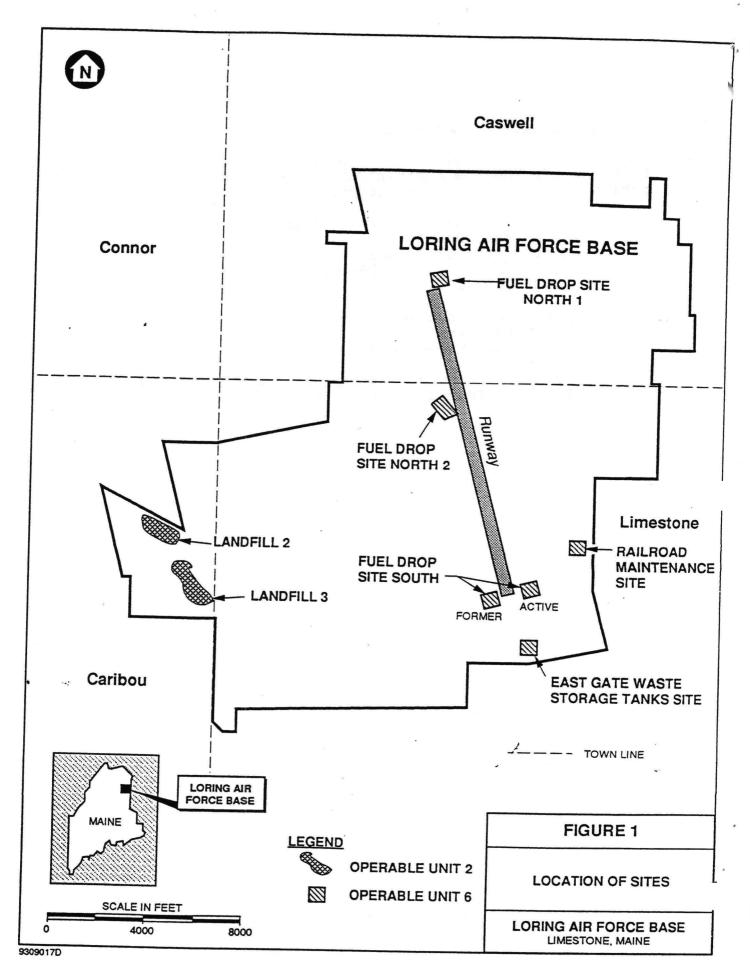
By this ESD, the Air Force, as lead agency, with concurrence from EPA and Maine Department of Environmental Protection, is modifying the decision to include using the material from the RRMS at Loring Air Force Base for subgrade fill beneath the landfill cap for OU 2.

E. Availability of Documents

This ESD shall become part of the administrative record for OU 6. Both the ESD and the administrative record are available to the public at the following locations.

Air Force Base Conversion Agency 5100 Texas Road Loring Air Force Base Limestone, Maine 04750-0523 (207) 328-7109

Robert A. Frost Memorial Library 23'8 Main Street Limestone, Maine 04750 Hours: Monday, Wednesday, Friday: 1:00 p.m. - 5:00 p.m. Tuesday, Thursday: 1:00 p.m. - 7:00 p.m.



II. SUMMARY OF SITE HISTORY, INVESTIGATION HISTORY AND SELECTED REMEDY

A. Site Name, Location, and Description

LAFB is a National Priorities List (NPL) site. There are currently 21 Areas of Concern within LAFB under investigation which are grouped into 15 Operable Units. This ESD relates to the RRMS, which is one Area of Concern within Operable Unit 6.

LAFB is located in northeastern Maine and is bordered on the south and east by the Town of Limestone, on the north by the towns of Caswell and Connor, and on the west by the City of Caribou. The base is three miles west of the United States/Canada border and covers approximately 9,000 acres. Base operations are expected to gradually decrease until base closure in September 1994.

The topography of the base is gently rolling, with several brooks cutting through the terrain. The main base elevations range from 746 feet above mean sea level (MSL) on the main runway to approximately 570 feet above MSL in the southwest portion of the base.

Land surrounding the base consists primarily of farmlands, forests, and wetlands.

The RRMS, is located in the southeastern corner of the base, approximately 800 feet from the base's eastern boundary. The RRMS was used as a maintenance yard for railroad equipment.

B. Site History

Construction of the LAFB airfield began in 1947 and was completed in 1953. Aviation activities have occurred at the base from 1953 until the spring of 1994. Aircraft which operated at LAFB included KC-135 Stratotanker fueling aircraft, B-36 Peacemaker bombers, B-52 Stratofortress bombers, F-106 fighters and F-15 fighters.

Many of the industrial, flying, and military activities at LAFB required the storage and handling of hazardous materials. Several maintenance hangars and aircraft maintenance shops, have been used continuously since 1952.

During the 1980's 19 drums containing heavy oils and antifreeze associated with maintenance operations were removed from the RRMS. In 1989 stained soil near the former drum storage area was also removed. Confirmation soil sampling under the Installation

Restoration Program (IRP) indicated that all the contaminated soil was not removed.

Soil borings in the RRMS area identified PAH and total petroleum hydrocarbons in surface and subsurface soils during 1993 sampling. PAHs were determined to be the only contaminant of concern at this site. PAHs were detected in surface soils and borings where they were found in decreasing concentrations to a depth of 8-10 feet. The maximum total carcinogenic PAH concentration detected in soils was 8.58 mg/kg with the mean of 1.76 mg/kg. The total incremental human health carcinogenic risks associated with exposure under all scenarios did not exceed EPA's acceptable risk level of 1.0xE-4.

The ecological risk assessment demonstrated that adverse effects related to long-term exposure to the PAHs in surface soils are possible for three of the five indicator species (short tail shrew, HI=99; American woodcock, HI=1.4; and the garter snake, HI=1.2). The Remedial Investigation determined that the PAHs exceeded the acceptable ecological risk levels and required an action as described in the OU 6 ROD.

C. Investigation History

The investigation history at LAFB, including OU 6, is summarized as follows:

- In 1984, a Preliminary Assessment Study was completed by CH₂M Hill detailing historical hazardous material usage and waste disposal practices at LAFB.
- Initial Site Inspection field work to determine if contaminants were present at the OU 6 sites was conducted in 1985 by R.F. Weston, Inc.
- The Remedial Investigation/Feasibility Study (RI/FS) process was begun in 1988 and continued by ABB-ES until 1993.
- LAFB was added to the NPL in February of 1990.
- In 1991, the Air Force, EPA and MEDEP entered into a Federal Facility Agreement (FFA) with the USEPA and the MEDEP regarding the cleanup of environmental contamination at LAFB. The FFA was amended in December, 1993 to address base closure related issues, such as real property transfer.
- The Air Force and EPA signed a ROD for OU 6 April 4, 1994. The MEDEP provided a letter of concurrence on this ROD.

D. Selected Remedy

The 1994 ROD for OU 6 requires that the source control remedy for the RRMS site include the following components:

- mobilization and site preparation;
- excavation of contaminated surface and/or subsurface soil;
- disposal of excavated material in an off-base licensed landfill or treatment facility;
- restoration of the site; and
- site review, including confirmation sampling.

The nature and distribution of contaminants in groundwater will be evaluated as part of OU 12 investigations. The groundwater characterizations were incomplete at the time of the OU 6 ROD signature. Additional action will be taken if the groundwater investigation indicates that action is required.

III. DESCRIPTION OF SIGNIFICANT DIFFERENCES

The selected remedy for the RRMS as outlined above in section II.D. and set forth in the OU 6 ROD includes excavation of an approximately 200 yd of soil. The ROD provides that the material will be excavated and transported to an off-base, privately operated, special waste landfill or treatment facility licensed by the State of Maine. A transport distance of 200 miles was used in the OU 6 Focused Feasibility Study.

The difference between the remedy selected in the OU 6 ROD and the remedy to be taken at RRMS is that the excavated material will be transported approximately 5 miles on LAFB property to OU 2 and placed as necessary subgrade fill under the OU 2 landfill cap rather than to an off-base facility. Before excavated material from the RRMS. can be used as subgrade material at OU 2, the Air Force must issue an OU 2 ROD which complies with CERCLA and the NCP and which permits such use. The OU 2 ROD is expected to be issued concurrently with this ESD.

Because the 1994 OU 6 ROD did not include the use of material from the RRMS as subgrade fill for the OU 2 landfill cap as part of the preferred alternative, the Air Force, as lead agency, is issuing this ESD.

APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)

Use of material from RRMS as subgrade fill at OU 2 requires compliance with the ARARs contained in the OU 6 ROD. In addition, the following is noted:

Resource Conservation and Recovery Act (RCRA), Land Disposal Restrictions, 40 CFR Part 268. Under this regulation, land disposal of RCRA hazardous waste is restricted without specified treatment. For this regulation to apply, it must be determined that the waste meets the definition of one of the specified restricted wastes and that the remedial action constitutes placement. For each hazardous waste, this regulation specifies that the waste must be treated either by a treatment technology or to a concentration level prior to disposal in a RCRA Subtitle C permitted facility.

The Air Force must determine if the RRMS material is hazardous and subject to this regulation and must demonstrate that it has complied with the procedures set forth in the "Technical Memorandum - A Land Disposal Restriction Evaluation of Soils Proposed as Landfill Subgrade Materials, 13 July 1994" (LDR Technical Memorandum), which has been made part of the OU 6 Administrative Record. The Air Force has analyzed the RRMS material and has determined that it is not RCRA hazardous waste. The Air Force has complied with the LDR Technical Memorandum.

Because the RRMS material has been determined not to be RCRA hazardous waste, this regulation is not an ARAR. If, however, it is later determined that any of the material from RRMS is hazardous, this regulation would be an ARAR and such material could not be placed under the OU 2 landfill cap unless it is treated in accordance with the requirements of this regulation.

Federal and State permits. Although OU 2 will be receiving material from the RRMS, it is not necessary for any Federal or State permits to be obtained for OU 2 in connection with the action taken pursuant to this ESD. OU 2 and OU 6 may be viewed as separate "facilities" as defined in CERCLA §101(9). Under the NCP, it is appropriate to aggregate non-contiguous facilities for the purpose of a response action if the sites are related based on the threat posed and based on geography (55 FR 8690, March 8, 1990). Therefore, the CERCLA off-site policy which is listed as a policy "To Be Considered" in the OU 6 ROD ARARs for RRMS does not need to be considered in connection with the use of the RRMS material at OU 2.

IV. SUPPORT AGENCY COMMENTS

EPA and MEDEP have participated with the Air Force as lead agency in developing the changes to the 1994 ROD for OU 6 and support the changes described in this ESD. The changes allow the Air Force to address contamination at LAFB in a manner which addresses the concerns of the community, and is still protective of human health and the environment.

V. STATUTORY DETERMINATIONS

Considering the above-described adjustments to the selected remedy set forth in the 1994 ROD for OU 6, the Air Force believes that the remedy remains protective of human health and the environment; complies with Federal and State requirements that are applicable or relevant and appropriate to the remedial action; and is cost-effective. In fact, the revised remedy set forth in this ESD is more cost-effective than the remedy selected in the OU 6 ROD. In addition, the revised remedy results in permanent solutions (removal of all wastes) for the RRMS.

VI. PUBLIC PARTICIPATION

This ESD, as well as all other material relating to investigations and remedy selection, is available for public review at the locations listed in Section I above. The public has had the opportunity to comment during the public comment period for OU 2 and during a public meeting and hearing held on July 26, 1994 and supports the use of materials from other LAFB sites (such as the RRMS site) as subgrade fill at OU 2.

REFERENCES

(3) (*)

:

- Maine Department of Environmental Protection, Maine Solid Waste Regulations, Code of Maine Rules, Chapters 400 and 401.
- Maine Department of Environmental Protection, Maine Landfill Disposal Regulations for the Management, Testing, and Disposal of Special Wastes, Code of Maine Rules, Chapter 405.4.
- Occupational Safety and Health Administration, 29 CFR Part 1910.
- Occupational Safety and Health Administration, 29 CFR § 1910.1001 or § 1926.58.
- Occupational Safety and Health Administration, 29 CFR Part 1926.
- U.S. Air Force (USAF), 1994. AFBCA/OL-M letter to Andrew Miniuks, U.S. Environmental Protection Agency, Subj: "A Land Disposal Restriction Evaluation of Soils Proposed as Landfill Subgrade Materials"; 13 July 1994.
- U.S. Environmental Protection Agency (USEPA), 1988. "CERCLA Compliance with Other Laws Manual: Interim Final"; EPA/540/G-89/006; August.
- U.S. Environmental Protection Agency (USEPA), 1989. "Interim Final Guidance on Preparing Superfund Decision Documents"; OSWER Directive 9355.3-02; June.
- U.S. Environmental Protection Agency (USEPA), 1991. "Design and Construction of RCRA/CERCLA Final Covers"; Office of Research and Development, Washington, DC; EPA/625/4-91/025; May.
- .U.S. Environmental Protection Agency (USEPA), 1992. "National Oil and Hazardous Substances Pollution Contingency Plan (The NCP)"; OSWER Directive 9200.2-14; January.

GLOSSARY OF ACRONYMS AND ABBREVIATIONS

ARARS Applicable or Relevant and Appropriate Requirements
CERCLA Comprehensive Environmental Response, Compensation, and

Liability Act (42 USC 9217, et seq.)

CFR Code of Federal Regulations EGWST East Gate Waste Storage Tank

EPA Environmental Protection Agency (also USEPA)

ESD Explanation of Significant Differences

FDS Fuel Drop Sites

FFA Federal Facilities Agreement FFS Focused Feasibility Study

FR Federal Register

IRP Installation Restoration Program

LAFB Loring Air Force Base

MEDEP Maine Department of Environmental Protection

MSL Mean sea level

NCP National Oil and Hazardous Substances Contingency Plan

(40 CFR 300.435)

NPL National Priorities List

OSWER Office of Solid Waste and Emergency Response

OU Operable Unit

PAH Polynuclear Aromatic Hydrocarbon

RCRA Resource Conservation and Recovery Act

ROD Record of Decision

RRMS Railroad Maintenance Site

USC United States Code

USAF United States Air Force

USEPA United States Environmental Protection

yds' cubic yards



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN R. McKERNAN, JR. GOVERNOR

DEBRAH J. RICHARD ACTING COMMISSIONER

August 19, 1994

Peter Forbes AFBCA/OL-M P.O. Box 523 Limestone. Maine 04750-0523

Re: Loring Air Force Base Superfund Site, Limestone, Maine

Dear Mr. Forbes:

The Maine Department of Environmental Protection (MEDEP) has reviewed the August 1994 Explanation of Significant Difference regarding the Railroad Maintenance Site for the Loring Air Force Base Superfund Site located in Limestone, Maine,

Based on the draft, the MEDEP concurs with the selected remedial action. The selected remedy for this site consists of excavating the Railroad Maintenance Site and using the excavated materials as subgrade fill for on-base landfill cap construction. The remedial action is an interim remedy that includes source control to reduce contamination leaching to groundwater and maintains compatibility with the final remedial measures, while OU6 groundwater is evaluated and the final remedial alternatives are studied.

Remedy

The selected remedy for the RRMS as outlined in the OU6 ROD includes excavation of an upper estimate of 200 yard³ of soil. Material will be excavated and transported to a licensed state of Maine special waste landfill or treatment facility. A transport distance of 200 miles was used in the FFS.

The difference between the selected remedy outlined in the April 1994 OU6 ROD and the remedy being taken is that the excavated material will not be transported off-site. Instead it will be transported by truck approximately 5 miles on LAFB property to landfill 2 or 3 (OU2). The material will then be placed and spread at the landfill as subgrade fill before landfill cap construction. No permanent land-use restrictions will be required at the RRMS since all PAH contaminated soil will be removed.

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AUGUSTA PORTI AND STATE HOUSE STATION 17 ALICUSTA, MAINE 04333-0017 (207) 287-7658 FAX: (207) 287-7826 OFFICE LOCATED AT: RAY BUILDING, HOSPITAL STREET

312 CANCO ROAD PORTLAND, ME 04103 (207) 879-6300 FAX: (20)

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Use of the RRMS material as subgrade fill for OU2 was not anticipated when the ROD for OU6 was finalized because the OU2 ROD was not completed. However, the LDR memorandum outlines a process for consolidating soils from various areas on LAFB to be used as subgrade for the landfill and the soils from the RRMS conform with the LDR memorandum's process.

The states concurrence in the selected remedy, as described above, should not be construed as the State's concurrence with any conclusions of law or findings of fact which may be set forth in the Record of Decision (Explanation of Significant Difference). The State reserves any and all rights to challenge any such finding of fact or conclusion of law in any other context. This concurrence is based upon the State's understanding that the MEDEP will continue to participate in the Federal Facilities Agreement and in the review and approval of operational, design, and monitoring plans.

The MEDEP looks forward to working with the Department of the Air Force and the USEPA to resolve the environmental problems posed by this site. If you need additional information, do not hesitate to contact myself or members of my staff.

Sincerely,

Deborah N. Garrett, Acting Commissioner Department of Environmental Protection

pc: Mark Hyland, MEDEP

Mike Nalipinski, EPA

Hank Lowman, BCA

DECLARATION FOR THE RECORD OF DECISION

SITE NAME AND LOCATION

Loring Air Force Base (LAFB) Operable Unit (OU) 7, Quarry Site Limestone, Maine.

STATEMENT OF BASIS AND PURPOSE

This decision document presents the selected source control and soil remedial action for the Quarry Site, which comprises OU 7 at Loring Air Force Base, Maine. This decision document was developed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 (42 U.S.C. §9601 et seq), and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP); 40 CFR Part 300 et seq (1990). This decision is based on the administrative record for the site, which was developed in accordance with Section 113(k) of CERCLA, and which is available for public review at the information repositories located at Robert A. Frost Memorial Library, 238 Main Street, Limestone, Maine, and the Air Force Base Conversion Agency at LAFB, AFBCA/OL-M, Building 5100, Texas Road, Loring AFB, Maine. Through the remedial action at OU 7, the U.S. Air Force (USAF) plans to remedy the threat to human health and the environment posed by the presence of contaminated soils at the Quarry through the implementation of a source control remedial action.

The State of Maine Department of Environmental Protection (MEDEP) concurs with the selected remedy for the OU 7.

ASSESSMENT OF OU 7

Actual or threatened releases of hazardous substances from the OU 7, if not addressed by implementing the response action selected in this Record of Decision,

Installation Restoration Program CONCURRENCES					
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may pose an imminent and substantial endangerment to human health, welfare, and the environment.

DESCRIPTION OF THE SELECTED REMEDY

The selected remedy for the Quarry Site is excavation and use of the excavated material as subgrade fill for on-base landfill cap construction. The major components of the remedy include:

- site preparation;
- excavation of upper and lower tier soil and drainage ditch sediment;
- placement of excavated soil and sediment at OU 2 Landfills as subgrade material for landfill cap construction;
- restoration of Quarry wetland;
- environmental monitoring of the groundwater and Greenlaw Brook wetland; and
- five-year site reviews.

The placement of soil and sediment as subgrade material at OU 2 landfills is subject to the issuance of a Record of Decision for OU 2 pursuant to CERCLA and the NCP which permits such placement. The OU 2 Record of Decision is expected to be issued concurrently with this OU 7 Record of Decision.

STATUTORY DETERMINATIONS

The remedy selected by the USAF is protective of human health and the environment, complies with federal and state applicable or relevant and appropriate requirements for this action, and is cost-effective. This remedy uses permanent solutions and alternative treatment technologies to the maximum extent practicable.

DECLARA	TION
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The selected remedy does not, however, satisfy the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element. The selected remedy will reduce mobility of contaminants through the containment features of the landfill cover system at OU 2, which will also reduce rainwater infiltration, erosion, and direct contact with the contaminated soil and sediment.

DECLARATION

The foregoing represents the selection of a remedial action under CERCLA for OU 7 by the USAF and the USEPA-New England, with the concurrence of the MEDEP.

Concur and recommend for immediate implementation:

Ву:	Alan K. Olsen Director Air Force Base Conversion Agency	Date esterale 9, 1994
Ву:	John P. DeVillars	Date:

Regional Administrator USEPA-New England

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