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TRANSMITTAL LETTER AND U S NAVY RESPONSE TO COMMENTS FOR MUNITIONS
AND EXPLOSIVES OF CONCERN TIME CRITICAL REMOVAL ACTION AT FORMER
MUNITIONS BUNKER WEST AREA NAS BRUNSWICK ME
3/22/2012
BASE REALIGNMENT AND CLOSURE PROGRAM MANAGEMENT OFFICE NORTHEAST



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
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BPMO NE/TB
Ser 12-064
March 22, 2012

Mr. Michael J. Daly
Remedial Project Manager
OSRR07-3
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Ms. Claudia Sait
Remedial Project Manager
Maine Department of Environmental Protection (MEDEP)
Bureau of Remediation and Waste Management
17 State House Station
Augusta, ME 04333-0017

Dear Mr. Daly and Ms. Sait:

Enclosed please find the Final Report for Munitions and Explosives of Concern (MEC) Time- Critical Removal Action (TCRA) at Former Munitions Bunker West (FMBW) Area. The draft version of the report (formerly named After Action Report, issued in February 2011, Rev. 0) was concurrently reviewed by Naval Ordnance Safety and Security Activity (NOSSA) and regulatory agencies, and all comments have been incorporated. Comments from NOSSA were nominal, no comments were received from USEPA, and although comments were received from both MEDEP (March 14, 2011) and BACSE (March 31, 2011), none necessitated changes to the report. Also enclosed is the Navy's comment response letter addressing MEDEP and BACSE comments. (Subsequently, the report was on hold pending resolution of potential environmental issues related to the on-site magazines unrelated to the MEC TCRA.) In January 2012, the revised report (Rev. 1) was issued only to NOSSA for concurrence from Department of Defense Explosive Safety Board (DDESB). DDESB accepted the report without revision on March 13, 2012, and so the report is now available to the regulatory agencies. The January 2012 (Rev. 1) date has been retained, although the report has been renamed based on instruction provided by NOSSA, who reserves the title "After Action Report" for their own purposes.

If you have any questions or comments, please contact the Navy's Remedial Project Manager, Todd Bober at (215) 897-4911.

Sincerely,



PAUL F. BURGIO
BRAC Environmental Coordinator
By direction of BRAC PMO

Enclosure:

1. Final Report for MEC TCRA at FMBW Area, NAS Brunswick, ME
2. Navy's Comment Response Letter Addressing MEDEP and BACSE Comments

Copy to:

MEDEP (C. Evans)
NASB (R. LeClerc)
Lepage Environmental (C. Lepage)
NAVFAC Mid-Atlantic (T. Bober)
NAVFAC Atlantic (J. Wright, D. Barclift)
Tetra Tech (J. Orient, C. Race, L. Klink, File, Library, Admin. Record)

Copy to: (w/o encl)

BACSE (E. Benedikt, C. Warren)
RAB Brunswick Representative (S. Johnson)
RAB Harpswell Representative (D. Chipman)
RAB Topsham Representative (S. Libby)
MRRRA (T. Brubaker)
Tetra Tech (S. Giannino, J. Forrelli)

**Responses to MEDEP Comments dated March 14, 2011
Report for Munitions and Explosives of Concern
Time Critical Removal Action at Former Munitions Bunker West dated February 2011
Former Naval Air Station, Brunswick, Maine**

General Comments

1. **Comment:** Since a number of non munitions related debris are just listed as scrap metal, please confirm in the report that no 55-gallon drums or other items of interest to the CERCLA program were found during either the surface survey or the subsurface anomaly investigation.

Response: Acknowledged. No drums or other CERCLA related objects were found during the investigation of the Former Munitions Bunker West (FMBW). All metal scraps indicated on Table 5-1 and 5-3 were scraps or fragments of metal ranging from approximately 0.1 to 2.0 pounds each.

2. **Comment:** Once the question above is addressed it appears that the Navy has performed its due diligence on the FMBWA under the Military Munitions Rule Program and it may be time, with the exclusion of the two remaining bunkers and the immediate area around them, to consider no further action for this area.

Response: Agreed. No further munitions-related investigation or sampling for munitions constituents is warranted related to historical training operations at the site. Note that, as part of RCRA Closure activities, sampling of soil outside of the two remaining and one former magazine within the FMBW boundary was conducted independent of the FMBW investigation and is addressed independently and under separate cover; based on the results, the Navy will conduct removal of cadmium contaminated soils.

**Responses to Brunswick Area Citizens for a Safe Environment (BACSE)
Submitted by Lepage Environmental Services, Inc.
Comments dated March 31, 2011 on the
Report for Munitions and Explosives of Concern
Time Critical Removal Action at Former Munitions Bunker West dated February 2011
Former Naval Air Station, Brunswick, Maine**

General Comments

1. **Comment:** Items of Interest to the CERCLA Program; The Report stated that scrap metal was found at the site, but it isn't clear what was actually found. MEDEP Comment Number 1 asks the Navy to confirm that no 55-gallon drums or other items of interest to the CERCLA program were found during either the surface survey or the subsurface anomaly investigation.

To follow up on the MEDEP's Comment Number 1, how will the Navy proceed if items of interest to the CERCLA program (such as 55-gallon drums) were found at the site?

Response: Acknowledged. No drums or other CERCLA related objects were found during the investigation of the Former Munitions Bunker West (FMBW). All metal scrapes indicated on Table 5-1 and 5-3 were scraps or fragments of metal ranging from approximately 0.1 to 2.0 pounds each.

2. **Comment:** Exclusion of Two Bunkers and Immediate Surrounding Area from No Further Action; If the response to Comment Number 1 is that no items of interest to the CERCLA program were found, MEDEP Comment Number 2 suggests that the Navy consider no further action for the site, with the exception of the two bunkers and the area immediately surrounding the bunkers.

How will the two bunkers and the area immediately surrounding the bunkers be addressed? Under which program? Will the rest of the parcel be leased or transferred before the bunkers and immediate environs are addressed? How will public access be restricted or managed until the potential hazards of the bunkers, and the area immediately surrounding them, are resolved?

Response: No further munitions-related investigation or sampling for munitions constituents is warranted related to historical training operations at the site. Note that, as part of RCRA Closure activities, sampling of soil outside of the two remaining and one former magazine within the FMBW boundary was conducted independent of the FMBW investigation and is addressed independently and under separate cover; based on the results, the Navy will conduct removal of cadmium contaminated soils.