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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

RETAIN
UNTIL Aug 1991

Commander L.K. Jones
Public Works Officer
Department of the Navy
Brunswick, ME 04011-5000

RE: Workplan for Step 1B - Site Characterization
and the proposed Corrective Action Order

Dear Commander Jones:

As previously discussed with you and Greg Apraham, EPA will be issuing the Naval Air Station a Corrective Action Order addressing the past hazardous waste disposal sites. This order will require various sampling and analysis from surface and ground water, soil, sediments and possibly air. EPA is cognizant of the work already accomplished at the Air Station and will, to the extent possible, avoid requiring duplicative efforts.

Because the Air Station is on the Proposed National Priority List (NPL) for Superfund, any corrective action plans and activities must meet the standards of the National Oil and Hazardous Substances Contingency Plan (NCP). EPA is presently reviewing the Initial Assessment Study and Step 1A Confirmation Study to determine how well they conform to the NCP standards. The workplan for the Step 1B Site Characterization will also be reviewed in this manner.

NASB should develop the workplan so that it is consistent with the NCP. Attached is a list of objectives to be assessed in determining whether and what type of remedial and/or removal action should be considered.

If the workplan requires major modification then EPA may issue an order requiring detailed site specific activities to be done. If the workplan is adequate it may be incorporated by reference into the order.

If you have any questions or comments please contact me at (617)223-4830.

Sincerely,

Robert L. Jackson, Environmental Engineer
ME Waste Regulation Section

cc: Pat Zabrochi, Maine DEP
Peg Veley, EPA
Greg Apraham, NASB



Attachment

1. Population, environmental and welfare concerns at risk.
2. Routes of exposure.
3. Amount, concentration, hazardous properties, environmental fate and transport (e.g. ability and opportunities to bioaccumulate, persistence, mobility, etc.) and form of the substance(s) present.
4. Hydrogeological factors (e.g. soil permeability, depth to saturated zone, hydrologic gradients, proximity to a drinking water aquifer, floodplains and wetlands proximity).
5. Current and potential ground water use (e.g. the appropriate ground water classes under the system established in the EPA Ground Water Protection Strategy).
6. Climate (rainfall, etc.).
7. The extent to which the source can be adequately identified and characterized.
8. Whether substances at the site may be reused or recycled.
9. The likelihood of future releases if the substances remain on site.
10. The extent to which natural or man-made barriers currently contain the substances and the adequacy of the barriers.
11. The extent to which the substances have migrated or are expected to migrate from the area of their original location or new location if relocated, and whether future migration may pose a threat to public health welfare or the environment.
12. The extent to which Federal environmental and public health requirements are applicable or relevant and appropriate to the specific site, and the extent to which other Federal criteria, advisories, and guidance and State standards are to be considered in developing the remedy.
13. The extent to which contamination levels exceed applicable or relevant and appropriate Federal criteria, advisories, and guidance and State standards.
14. Contribution of the contamination to an air, land, water and/or food chain contamination problem.