



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

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NAS BRUNSWICK  
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November 12, 1991

Mr. James Shafer (Code 1421)  
Northern Division  
Naval Facilities Engineering Command  
U.S. Naval Base, Bldg. 77 Low  
Philadelphia, PA 19112-5094

Subj: U.S. EPA Comments  
Draft (October 1991) Proposed Plan -  
Sites 1 and 3  
Naval Air Station Brunswick  
Brunswick, Maine

Dear Jim:

The United States Environmental Protection Agency (EPA) has received and reviewed the document entitled "Draft Proposed Plan - Sites 1 and 3" dated October 1991, for the Naval Air Station Brunswick in Brunswick, Maine. Attachment I contains EPA's comments.

EPA recommends that a meeting or conference call between the project managers be scheduled prior to finalization of this document to ensure that all comments are addressed and incorporated into the final Proposed Plan.

Please contact me at (617)573-5785 if you have any questions regarding these comments.

Sincerely,

Meghan F. Cassidy  
Remedial Project Manager

Enclosure

cc: Eileen Curry/NASB  
Mel Dickenson/ABB Environmental  
Ted Wolfe/ME DEP  
Ann Johnson/SAIC  
Mary Jane O'Donnell/US EPA  
Sheila Eckman/US EPA  
Bob DiBiccaro/US EPA  
Diane Ready/US EPA



## ATTACHMENT I

The comments provided below pertain to the report entitled "Draft Proposed Plan - Sites 1 and 3" (October 1991). This Proposed Plan was submitted by the U.S. Department of the Navy for the Naval Air Station Brunswick in Brunswick, Maine.

1. Page 1-3, Figure 1: A shaded square is depicted on the map between Sites 1 and 3, and Site 2. Indicate in a legend what this shaded area represents or delete it from the figure.
2. Page 3-4, ¶ 3, second sentence: The word "rules" in this sentence should be changed to "roles". The revised sentence should read "The FFA sets forth the roles and responsibilities ...".
3. Page 3-11, ¶ 1: Indicate in the text whether the value of 1.3 milligrams per liter of VOCs detected in a leachate seep represents a maximum value.
4. Page 3-11, ¶ 2: Clarify, in the text, whether PAHs were detected in stream sediments only. The paragraph as written is somewhat confusing and does not clearly indicate that PAHs were detected both upstream and at Sites 1 and 3 in stream sediments only.
5. Page 3-11: As commented previously, this section should include a discussion on contaminant distribution in surface water.
6. Page 4-3, ¶ 2: This paragraph should state that due to the upstream contamination of Mere Brook surface waters and the need to further examine the source of this contamination, Mere Brook is not being included as part of this operable unit, which includes Sites 1 and 3. However, it can be stated that the selected remedy for Sites 1 and 3 will eliminate the discharge of contaminated groundwater from Sites 1 and 3 to Mere Brook. Further, it should be explained that Mere Brook will be considered as a separate area of study and that the Navy will continue to examine possible upstream sources of contamination, specifically iron and zinc, in Mere Brook. The text should also indicate that if at any time in the future additional upstream sources of contamination which can be attributed to past disposal are identified, these newly identified sites would fall under CERCLA authority.
7. Page 5-1, Cleanup Objective No. 2: Revise this objective as follows:

"to minimize any future negative impact to Mere Brook and the sediments in the leachate seeps resulting from the discharge of contaminated groundwater and leachate from Sites 1 and 3;"

8. Page 5-2, ¶ 1: The word "VOC" in the second to last sentence should be "VOCs".
9. Page 5-2, ¶ 2: In the fifth sentence of this paragraph, the word "case" should be replaced with the word "cease".
10. Page 6-6, ¶ 1: Insert a sentence in this paragraph which states that should the Weapons Compound be decommissioned at any time in the future, the Navy would evaluate the need of extending the cap and slurry wall to include that portion of the Weapons Compound which is also part of the landfill area.
11. Page 6-10, ¶ 1: The last sentence of this paragraph should indicate that "natural degradative processes" will also play a role in decreasing the contaminant concentrations in the seep sediments. This is consistent with what has been stated in previous sections of the plan.
12. Page 6-10, ¶ 1: The first full sentence of this paragraph should indicate that groundwater feeding the seeps will be below the seep elevation and any impact on these areas by groundwater would be by clean groundwater which has been diverted around the slurry wall.
13. Page 6-10, ¶ 1: Include a sentence here as to whether removing the sediments would result in more environmental damage than leaving them in place.
14. Page 7-5, ¶ 4: Since Maine is in a non-attainment area for ozone off-gas treatment from an air-stripping unit would be required. (Note this comment was made previously by EPA in relation to the Draft Final Focused Feasibility Study for Sites 1 and 3). Therefore, modify the first two sentences of this paragraph to reflect the fact that vapor-phase carbon would be part of the treatment train.
15. Page 7-6, ¶ 1: Include a sentence at the end of this paragraph which indicates whether the feasibility of using off-gas incineration and locating the treatment system some distance from Sites 1 and 3 was examined.
16. Page 8-1, ¶ 1: The last sentence of this paragraph refers to an "interim remedial action". Delete the word interim from this sentence.
17. Page 8-2, ¶ 1: The first sentence of this paragraph should state that the preferred alternative will reduce contamination to levels protective of human health and the environment.

18. Page 8-6, ¶ 3: The first sentence of this paragraph should be revised to read as follows.

"The other treatment alternatives, reduce toxicity and mobility through treatment, however they rely on natural flushing to decrease contaminant levels..."

19. Page 8-10, ¶ 1: EPA recommends inserting the following as the second sentence of this paragraph and deleting the sentence currently in the text.

"The State may comment further after it has had an opportunity to review comments received during the public comment period."

This is in response to the language proposed by the State in their comments submitted to the Navy on September 23, 1991.

20. Glossary, definition of Milligrams per Liter: Include in this definition that it is also known as 1 part per million (ppm).
21. EPA notes that the Navy did not include a definition of Maximum Exposure Guideline (MEG) in the glossary as requested by the State. This definition should be added.