



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NAS BRUNSWICK
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ANGUS S. KING, JR.
GOVERNOR

February 12, 1998

EDWARD O. SULLIVAN
COMMISSIONER

Mr. Emil Klawitter
Code 1823 EK
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19112-2090

Re: Record of Decision for Site 2
Naval Air Station-Brunswick, Maine

Dear Mr. Klawitter:

The Department of Environmental Protection (DEP or Department) has reviewed the Draft Record of Decision (ROD) for Site 2 for the Brunswick Naval Air Station, Brunswick, Maine. Based on this review the Department has the following issues and comments:

General Comments:

1. The Draft ROD generally reflects the Department's understanding of decisions that have been made regarding Site 2 over the last several years. The draft ROD does not deal specifically with the monitoring program which will be implemented at Site 2. A consensus must be established between all parties defining the extent and objectives of the monitoring program.
2. According to the October 31, 1996, Restoration Advisory Board meeting minutes the Navy proposed to install an additional groundwater monitoring well at the toe of the landfill. Also there was some discussion regarding the inclusion of an additional surface water monitoring location along a tributary to Mere Brook located southeast of the landfill. This additional monitoring is considered essential by the DEP.
3. Parameter threshold values must be established as part of the monitoring program. Exceedance of thresholds values should prompt contingency actions established to mitigate impacts to the environment. These contingencies should be defined as part of the monitoring program. While the parameter threshold values and contingency actions may be established during the future discussion of the monitoring program, the commitment to establishing the threshold values and contingency actions must be committed to in the ROD.

Specific Comments:

4. Declaration, Assessment of Site 2, Page 2, Para 2:

" Investigations at site 2 have shown that soil, groundwater, and surface water are not contaminated."

This statement is not consistent with the following statement included on Page 18, Para 1 of the Draft ROD;

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 764-1507

"In groundwater samples from Site 2, lead was the only inorganic compound detected in excess of its respective federal Maximum Contaminant Level (MCL) or Maine Maximum Exposure Guideline (MEG)."

Please clarify.

5. Declaration, Statutory Determinations, Page 3, Para :

"Treatment is unnecessary at this site since there is no risk to human health and the environment."

The fact current data (circa 1990) does not indicate risk should not be cause to overlook the potential risks. Geophysical investigations have indicated that metal debris is contained within the landfill. There is currently no knowledge of whether metal containers (e.g. 55-gallon drums) are located within the landfill. Likewise, there is no way of knowing the contents or integrity of drums that maybe within the landfill. The primary reason for instituting a monitoring program is this lack of certainty. The above statement needs to modified to reflect this.

6. Site Location Map, Page 6:

Greater detail is needed in this figure to provide the reader with a sense of the proximity of Site 2 to contaminant receptors, such as Mere Brook and the locations of existing monitoring wells. Please include a more detailed site plan of Site 2, such as the one used in the Remedial Investigation/Feasibility Study.

7. Summary of Site Characteristics, Page 18, Para 1:

"In the groundwater samples from Site 2, lead was the only inorganic compound detected in excess of its respective federal Maximum Contaminant Level (MCL) or Maine Maximum Exposure Guideline (MEG).

For clarity please include the lead concentration in this statement.

8. Compliance with Applicable or Relevant and Appropriate Requirements, Page 30 para 2:

"Chemical -specific ARARs include MCLs and MEGs, and the Maine Surface Water Toxics Control Program."

The Surface Water Toxics Control Program was promulgated from the Water Classification Program therefore both must be included as ARARs. In this ROD the Maine Surface Water Control Program is listed as chemical-specific; in the ROD for the Eastern Plume it was listed as location specific. Please clarify.

9. Compliance with Applicable or Relevant and Appropriate Requirements, Page 30 Para 2:

It is unclear from the site plan how close Mere Brook or its tributaries are to any soil disturbance associated with removing surface debris, and potential filling and grading. If the proposed soil disturbance is within 100 feet of the brook(s) or wetlands and the terrain was such that sedimentation could wash into it, then the Natural Resources Protection Act and Chapter 305 (Permit by Rule) section 2 would be location specific ARARs.

10. The Selected Remedy, D. Environmental Monitoring, Pages 37 & 38:

"A monitoring plan will be submitted for regulatory agency review and approval prior to implementation. Details of the monitoring program will be discussed at upcoming RAB meetings following signature of this ROD."

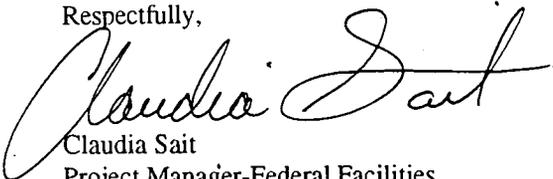
The monitoring information provided in the ROD contains less information than was outlined in the proposed plan for the public hearing. This information must be included in the ROD along with one change. The monitoring program must also include periodic organic monitoring since it is unknown whether there are containers of paints, solvents, oils, toluene, etc. within the landfill. Also, monitoring objectives need to be included as part of the ROD prior to concurrence.

Summary:

The Navy has proposed Minimal Action Remedy for Site 2 that will include institutional controls, land use restrictions, environmental monitoring, and five year reviews. The Department considers the proposed remedy appropriate if all the above comments and issues are addressed to the State's satisfaction. At this time, however, the Department does not concur with the Draft ROD for Site 2. State concurrence will be conditional upon incorporating all the necessary ARARs; establishing monitoring objectives; and the Navy's commitment to establishing threshold criteria for revisiting the remedy.

Please feel free to call me at (207) 287-7713 if you have any questions or comments regarding this matter.

Respectfully,



Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

cf: File
Richard Heath-DEP
Michael Barry-EPA
Carolyn Lepage-Lepage Environmental Associates
Capt. E.F. Carter-BNAS
Jim Caruthers-BNAS
Susan Weddle
Peter Nimmer-EA Engineering, Science & Technology
Steven Mierzykowski-USF&W
Jeffrey Brandow-ABB Environmental Services, Inc.
Rene Bernier
Jeff Dale-NAVFAC
Ken Finkelstein-NOAA
Don Gerrish
Alan Frazier-Brunswick-Topsham Water District
Thomas Fusco-BACSE
David Gleason
Richard Sobocinski