



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

VIA FACSIMILE AND U.S. MAIL

August 18, 1997

Mr. Fred Evans
Department of the Navy
Northern Division
Naval Facilities Engineering Command
Code 1823/FE
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Naval Air Station, Brunswick, Maine
Draft Final Record of Decision for a Remedial Action at Sites 4, 11, and 13

Dear Fred:

Attached are the U.S. Environmental Protection Agency's (EPA) comments on the *Draft Final Record of Decision for Sites 4, 11, and 13* for Brunswick Naval Air Station. This decision document presents the final action for Sites 4, 11, and 13, and its associated groundwater contamination, the Eastern Plume.

Although it is my goal to finalize this record of decision by the end of next month, I understand that we still need to resolve issues raised by the Maine Department of Environmental Protection (MEDEP). I appreciate your efforts in scheduling last week's meeting with the MEDEP and believe it moved us closer to the goal.

If I can be of any assistance and/or should you have any questions regarding my comments, please call me at (617) 223-5521.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Lim".

Robert Lim, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc. Jim Caruthers/NASB
Jeffrey Brandow/ABB
Claudia Sait/MEDEP
Susan Weddle/BACSE
Carolyn LePage/TAG Advisor
Rene Bernier/Topsham Community Rep.



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ATTACHMENT

The following are the EPA's comments on the *Draft Final Record of Decision for No Further Action at Sites 4, 11, and 13, and a Remedial Action for the Eastern Plume* dated July 1997.

1. Page 2, Assessment of the Site, ¶ 1, Last Sentence: Suggest deleting "However" and inserting "to address groundwater contamination" after "1995."
2. Page 6, USEPA Signature Block: Change "Linda M. Murphy" to "Harley F. Laing."
3. Page 7, Section I., ¶ 1, 2nd Sentence: Since all sites have been investigated, suggest editing sentence from "under investigation" to "have been investigated."
4. Page 49, ¶ 1: Delete "interim."
5. Page 52, Section IX.G. Cost: Reference Appendix E. Cost Estimated For The Selected Remedy.
6. Page 57, Section X.C., 3rd Sentence: Suggest including additional potential modifications such as "alternating pumping at extraction wells; pulse pumping to allow aquifer equilibration and to allow adsorbed contaminants to partition into groundwater."
7. Page 58, Section X.D. Attaining Remediation Goals: Suggest moving the text within this subsection to within Section X.A. Groundwater Extraction and Treatment.
8. Page 60, Table 2: Based on results from monitoring event #8, add remediation goals for 1,1,2-Trichloroethane (TCA) and 1,2-Dichloroethane (DCA).
9. Table B-1, SDWA - MCLs, **Action to be Taken to Attain ARAR**: The EPA believes that the text requires an update from the Interim ROD. Suggest revising text to the following:

"Primary MCLs have been set as the cleanup goals when the primary MCL was available. Groundwater extraction and treatment of the Eastern Plume will continue to prevent further migration and to restore the aquifer. Monitoring of Eastern Plume will continue to determine if cleanup goals have been met. It is estimated that cleanup goals will be attained throughout the plume over a time period between 13 to 71 years."
10. Table B-3, RCRA - Miscellaneous Units: Delete requirement since it applied to construction, not to continuing pump & treat operations.