



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

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June 3, 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 Supplemental Feasibility Study
Sites 5, 6 and 12
Naval Air Station Brunswick
Brunswick, Maine

Dear Mr. Shafer:

The United States Environmental Protection Agency (EPA) has received and reviewed the document entitled "Draft Supplemental Feasibility Study, Sites 5, 6 and 12" dated April 1991, for the Naval Air Station Brunswick in Brunswick, Maine. EPA's comments are included in the attachment to this letter.

EPA requests that the Navy submit a comment by comment response, as well as incorporate the necessary changes into the Draft Final Supplemental Feasibility Study.

Pursuant to Section 6.7(e) the Navy shall submit the Draft Final Supplemental Feasibility Study within 45 days of the close of the comment period, or no later than July 22, 1991.

If you have any questions regarding the enclosed comments or would like to discuss the comments further, please me at (617)573-5785.

Sincerely,

Meghan F. Cassidy
Remedial Project Manager

Enclosures



cc:

~~Eileen Curry/NASB~~

Mel Dickenson/E.C. Jordan
Ted Wolfe/ME DEP
Ann Johnson/SAIC
Mary Jane O'Donnell/US EPA
Bob DiBiccaro/US EPA
Richard Willey/US EPA
Jui-yu Hsieh/US EPA

ATTACHMENT I

The comments provided below pertain to the report entitled "Draft Supplemental Feasibility Study, Sites 5, 6 & 12" (April 1991). This report was submitted by the U.S. Department of the Navy for the Naval Air Station Brunswick in Brunswick, Maine. The report was prepared for the Navy by E.C. Jordan.

GENERAL COMMENTS

1. Any comments made by EPA regarding the Draft Supplemental Remedial Investigation Report which would change any of the information presented in the Supplemental Feasibility Study (FS) should be reflected in the revision of this document.
2. In the selection of the alternatives for detailed evaluation, an alternative incorporating in-situ vitrification should be considered. As indicated in the Draft Supplemental FS report, excavation of the wastes would require extensive health and safety precautions because of the asbestos that may be present in the wastes. Thus, an alternative that does not require excavation would be more attractive. Implementation of the in-situ vitrification technology for chemical wastes has made advances in recent years and in-situ vitrification was evaluated under the EPA SITE Program (the vendor was Geosafe Corp). Keeping in mind that vitrification is the only demonstrated technology for the treatment of asbestos, and that any remedial action at the site would not occur for at least a year or so (giving additional time for the development of the technology), the technology should be evaluated further.

SPECIFIC COMMENTS

Section 1.0 - Introduction

3. Page 1-2. Paragraph 1: Include some discussion of activities at Site 14 in this summary of work performed during the Post Screening field program.

Section 2.0 - Identification of Remedial Action Objectives and General Response Actions

4. Page 2-2, Paragraph 1: The last sentence is inconsistent with the rest of the paragraph. Apparently, the sites were used for disposal of asbestos-lined pipes and

- rubble. The text however, indicates that the sites have not been used as a disposal facility. Does that mean that the sites have not been routinely used as a disposal facility for chemical and other wastes? The intent of the sentence should be clarified.
5. Page 2-2, Paragraph 2: Indicate when a soil cover was place on the site.
 6. Page 2-2, Paragraph 3: This paragraph states that aircraft parts were disposed of at Site 6. This information was not included in the Supplemental RI Report. Indicate where this information was obtained and revise the Supplemental RI appropriately.
 7. Page 2-2, Paragraph 3: Indicate what happened to the asbestos pipes that were protruding from the surface. Where these pipes removed, covered? When did this activity occur.
 8. Page 2-2, Paragraph 3: Why is the Site 5 area posted with warning signs and yet Site 6, which this report states is more accessible, is not posted. The Navy should consider posting signs indicating the presence of asbestos at Site 6.
 9. Page 2-7, Paragraph 2: Further discussion is needed in the text to support the statement "It is not possible to determine how much of the surrounding soils may have been contaminated by asbestos-covered pipe."
 10. Page 2-7, Paragraph 3 and Page 2-8, Paragraph 4: Discuss whether asbestos is the only contaminant of concern at the sites.
 11. Page 2-8, Paragraph 2: Indicate how the four surface soil sample locations were selected.
 12. Page 2-10, Paragraph 2: This paragraph states that "construction debris (e.g., concrete blocks, asphalt rubble, and pipes) is scattered about the site and some may contain asbestos. This information was not included in the Supplemental RI Report. Indicate where this information was obtained and revise the Supplemental RI appropriately. Why wasn't any debris which may have contained asbestos sampled?
 13. Page 2-10, Paragraph 3: Indicate how the surface soil sample locations were selected.
 14. Page 2-10: Include a discussion regarding the installation and sampling of monitoring wells at Site 6.

15. Pages 2-10 through 2-13, Summary of Baseline Risk Assessment: In addition to the exposure assessment and risk characterization, the summary should also include compounds selected and a brief discussion of each compound's toxicity.
16. Page 2-11, Figure 2-5: The rationale for excluding Anomaly A from the "semicircular region" should be provided in the accompanying text. Language similar to that included in the Draft Supplemental RI would be helpful.
17. Page 2-12, Paragraph 2: Indicate in the depth to groundwater is believed to be 15 to 20 feet below ground surface.
18. Page 2-12, Paragraph 2: This paragraph states "In addition, at Site 5, the depth to groundwater is 15 to 20 feet below ground surface, eliminating mobilization of the asbestos from groundwater flow. Is this estimate of groundwater level representative of seasonal highs?

What is the depth of the asbestos? Page 5-2 states that Site 5 contains an estimated 14 asbestos-lined pipes at a maximum depth of 10 feet. How was the maximum depth of the pipes determined?

19. Page 2-12, Paragraph 3: What is the depth of the asbestos at this site and how was the depth determined?
20. Page 2-12, Paragraph 3: This paragraph states that "there is a potential for future exposure to off-site receptors through ingestion of contaminated groundwater". However in previous sections it is stated that due to the depth of groundwater mobilization of asbestos to groundwater is eliminated. Clarify how off-site receptors might be impacted by Sites 5 and 6 in the future.
21. Page 2-14, Paragraph 2: Indicate whether Site 12 will continue to be used for explosive ordnance dump training in the future.
22. Page 2-14, Paragraph 3: Include the depth of the test pits, the number of samples taken from each, and the criteria used to select samples.
23. Page 2-14, Paragraph 3: Specify which inorganics were included in analyses of soil samples from Site 12.
24. Page 2-16, Paragraph 2: Indicate which metals were found at Site 12 and discuss their toxicity.

25. Page 2-16, Paragraph 2: According to Appendix O of the Draft Supplemental RI, the mean concentration of contaminants in soil was used for calculation to represent the average future residential scenario for Site 12. Therefore, the statement made here that maximum concentrations were used as the worst case scenario is not correct and must be revised.
26. Page 2-17, Paragraph 2: Change "maximum" to "mean" contaminant concentrations in soils at Site 12.
27. Page 2-18, Paragraph 2: Discuss what actions will be taken to minimize possible risk from surface debris at Site 6.
28. Page 2-18, Paragraph 2: The remedial action objectives are not sufficiently specific. Reference should be made to exposure routes and receptors and to the media involved. See discussion at page 4-7 of the Guidance for Conducting Remedial Investigations and Feasibility Studies (October 1988) and Table 4-1 of the guidance. A table similar to Table 4-1 of the guidance should be included.
29. Page 2-18, Paragraph 3: The document states that Site 12 was eliminated from further consideration because the baseline risk assessments did not indicate a risk to human health or the environment. In order for a No Action ROD to be developed, the no action alternative for Site 12 must be carried through the FS process, i.e., there should be appropriate discussion in Sections 4, 5 and 6 of the Supplemental FS, and later when the detailed analysis of alternatives is prepared. This must be done in order to provide sufficient information to form the basis for the No Action ROD.
30. Page 2-18, Paragraph 3: Discuss whether there is any potential for future human health or environmental risks from Site 12.

Section 3.0 - Applicable or Relevant and Appropriate Requirements

31. Page 3-5, Paragraph 1 and Page 3-9, Table 3-2:
 - Table 3-2 does not include state regulatory limits as stated on page 3-5.
 - Table 3-2 does not include all metals for Site 12.

32. Page 3-7, Table 3-1: The State Guidance section from Table 3-1 (page 3-4) of the Draft Final RI Report (referring to Maine Rules relating to testing of private water systems) was not included here. It should be added with a status of To Be Considered.
33. Page 3-8, Table 3-1: The Asbestos NESHAP (40 CFR Part 61, Subpart M) should be specifically referenced.
34. Page 3-14, Table 3-3: Town Ordinances and State Guidelines were included in the Draft Final RI Report (page 3-11, table 3-3), but are not included here. Why were they not included in this report under To Be Considered?
35. Page 3-15, Table 3-4: EPA will continue to review which RCRA requirements will or may be ARARs. Additional comments will be made as necessary in future deliverables.
36. Page 3-17, Table 3-4: Any off-site discharge to surface water must meet both administrative and substantive NPDES requirements. This should be stated in the "Consideration i the RI/FS" column.
37. Page 3-21, Table 3-4: It is not clear that Maine DEP Bureau of Water Quality Control Policy No. 10 is an ARAR, i.e., whether it meets the requirements of Section 300.400(g)(5) of the NCP. If it does, a citation as to where it is promulgated should be given.

Section 4.0 - Identification and Screening of Technologies

38. Tables 4-1 and 4-2: The tables use the terms "technology" and "process options" interchangeably, whereas these terms have different meanings in the RI/FS Guidance (see page 4-16 and 4-17 of the guidance).
39. Page 4-3: The RI/FS Guidance (page 4-16) provides that process options should be evaluated using the same criteria (effectiveness, implementability, and cost) that are used to screen alternatives prior to the detailed analysis. It should be stated in the text that this evaluation process was used.
40. Page 4-5, Table 4-2: In-situ solidification should be included in the screening of remedial technologies.

Section 5.0 - Development of Remedial Action Alternatives

41. Page 5-1, Bullet No. 5: Revise this statement to clarify that according to the NCP, remedies are evaluated regarding their ability to reduce mobility, toxicity, or volume through treatment (see page 8720 of the NCP).
42. Page 5-3, Paragraph 3: Explain what routine monitoring might entail.
43. Page 5-5, Paragraph 3: During the development of alternatives, the amount of material to be treated should be known. If the amount of asbestos-containing materials disposed of at the site is unknown, the effectiveness and implementability of excavation cannot be evaluated.
44. Page 5-5, Paragraph 2: Can the two landfills identified accept the volume of asbestos waste which might be excavated from Sites 5 and 6? What is the capacity of each of these landfills?
45. Page 5-6, Paragraph 2: To evaluate the effectiveness of Alternative 5,6-F, the amount of material requiring excavation should be known. See also comment No. 45 above.

Section 6.0 - Screening of Remedial Alternatives

46. Page 6-1, Paragraph 2: The first sentence of this paragraph should indicate that an alternative is judged for its ability to reduce mobility, toxicity, or volume through treatment.
47. Page 6-2, Paragraph 3: The last sentence of this paragraph states that some criteria not described were used in evaluating the implementability of each alternative. Discuss these additional criteria.
48. Page 6-3, Paragraph 1: It should be stated in the text that both capital and O & M costs were considered.
49. Page 6-6, Paragraph 2: Provide the rationale for assuming a 6-inch soil cover.

Appendix A

50. Pages A-1 through A-9: Responses to EPA and DEP comments are included in Appendix A. First, indicate clearly what document these comments pertain to. In addition, indicate in the Table of Contents that these responses are included in Appendix A.