



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

August 23, 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 Final 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 Final Supplemental Feasibility Study, Sites 5, 6 and 12" dated July 1991, for the Naval Air Station Brunswick in Brunswick, Maine. EPA's comments are included in an attachment to this letter.

The following comments must be addressed prior to issuance of a Proposed Plan for these sites.

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

Sincerely,

Meghan F. Cassidy

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/EPA
Bob DiBiccaro/EPA



ATTACHMENT I

The comments provided below pertain to the report entitled "Draft Final Supplemental Feasibility Study, Sites 5, 6 & 12" (July 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.

1. Page 2-20, Paragraph 2: EPA requests additional information regarding maintenance activities at Site 12. This paragraph appears to indicate that the only potential for worker exposure is during explosive ordnance activities, which are fairly limited. However, EPA believes that worker exposure should be reconsidered due to the fact that recent maintenance activities indicate that potential exposure to soils at Site 12 is not limited to actual explosive ordnance activities.
2. Page 2-22, Paragraph 1: This paragraph indicates that "the remedial action objective at Site 6 will be to prevent future potential risks of exposure to airborne asbestos." However, no remedial action objective for Site 5 is described. A remedial action objective for Site 5 must be presented.
3. Page 2-22, Paragraph 2: This paragraph indicates that since there are no present or future risks associated with Site 12, the site is eliminated from further consideration in the Supplemental Feasibility Study. It is not clear how the Navy intends to document "no further action" at the site. Further discussions are warranted to determine the documentation necessary to make this determination.
4. Page 3-7, Table 3-1: This table indicates that Maine MEGs have been promulgated, and that they are relevant and appropriate. Maine MEGs have not been promulgated, therefore they should fall under the To Be Considered category. This table must be revised in this report.
5. Page 3-10, Table 3-2: This table lists chemical-specific ARARs for contaminants detected at Sites 5, 6 and/or 12. It is not clear why manganese is included in this table since previous text does not indicate that manganese was detected at any of the sites. Clarify whether manganese was detected at any of the sites in question and if so indicate at what levels it was detected.
6. Page 6-7, Paragraph 4: It should be clearly stated that Alternative 5,6-D, Capping, would also include fencing, posting of signs and deed restrictions.

7. Page 7-2, Tabl 7-1: This table incorrectly indicates that Alternative 5,6-C, soil cover was retained for detailed analysis when it was not. The table also indicates that Alternative 5,6-D, capping was eliminated. This table must be corrected.
8. Page A11, Response #10. The comment was addressed as it applies to Site 5, but as it relates to Site 6, the locations of the monitoring wells and analytical results (detected compounds) must be included to confirm that asbestos is the only contaminant of concern at the site.
9. Page A11, Response #14 The text provides discussion regarding the installation and sampling of the monitoring wells at Site 6, but the locations of the monitoring wells and the detected constituents should be included in this section.
10. Page A11, Response #18: Both parts of EPA's comment appear to have been addressed in Appendix A, however the responses are not included in the text. The text should include the responses as well.
11. Page A12, Response #24: A discussion of the detected metals is presented in the text, but Figure 2-6 does not reflect a complete list of detected metals, particularly chromium and lead. This figure must be revised.
12. Page A12, Response #28: The comment was addressed for Sites 5 and 6, but additional discussion is needed regarding exposure routes and receptor populations with respect to chromium and lead exposure at Site 12. Consider stating explicitly that for the parameters tested, detected concentrations are below background concentrations (cite background concentrations and their source), and therefore no remedial action objectives were developed.