



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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November 13, 2001

Lonnie Monaco (monacolj@exchange.efdnorth.northdiv.navy.mil)
Engineering Field Activity Northeast, Naval Facilities Engineering Command
Code 1821/LM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: *Draft Summary Report of Ground-Water and Soil Investigations at Site 7, Naval Air Station Brunswick, Maine*

Dear Mr. Monaco:

Thank you for the opportunity to review the above report which was submitted by EA Engineering Science and Technology, Inc on behalf of the Navy to the EPA on 10/23/2001.

General Comments:

1. The overall results of the removal were described by EA at the technical meeting on October 23-24. Per the ensuing discussion, EPA strongly supports the decision to pursue a monitoring/land use control remedy as the quickest and probably cheapest way to reach a Record of Decision and ultimately permanently resolve Site 7.
2. The report reads as very good news to EPA in that it appears a significant source of cadmium was removed from test pit 1. Depending on the precise groundwater flow, this area could be upgradient of both MW-NASB-94 & 99 and was likely upgradient of MW-NASB-94 during the pump test in December 2000.
3. We look forward to future groundwater results now that this source has been removed, though groundwater cleanup may be slow due to the peat layer and it's possible other sources may remain. Thus, EPA cannot concur at this time to absolutely "clear" groundwater if cadmium isn't detected above the MCL for two rounds. However, sampling periodicity and continuation should be evaluated in the context of the results and trends obtained (i.e. nearly constant results would indicate sampling could be infrequent and a steep and/or steady concentration decline would impart a high confidence to quickly discontinue sampling whilst a highly scattered, hazy trend would not).
4. Though the natural occurring peat layer in the vicinity of MW-NASB-94 may act as a source of cadmium, the report findings lead EPA to believe that the original source of

the cadmium that bonded into the peat was the activity at Site 7. Reported findings that lead EPA to this conclusion are:

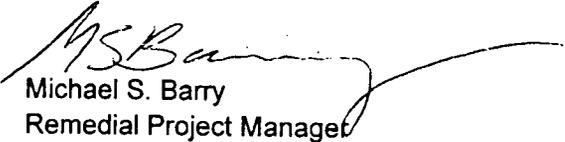
- a. Two discrete sources containing cadmium, the blue and white powder were found in trench 1. Also found in trench 1 were corrugated metal and the rust colored leech bed.
- b. The cadmium sources were found very close to the wells with cadmium above the MCL, whereas elsewhere cadmium is below the MCL.
- c. Site 7 is an old acid-caustic pit, where one would expect such disposal activities to have occurred.

Specific Comments:

5. Table 1. An improvement would be to note when the samples were taken in the table footnotes.
6. Since the photos are important to understanding the removal results, will color photos be provided in the final report? If that wasn't planned, could they be emailed so parties can print them out?
7. We concur with the recommendation to reuse stockpiles 1-4 and dispose of stockpile 5 off-site.

Resolving the low level, localized cadmium concentrations in Site 7 groundwater has been a persistent challenge for the entire project team and EPA would like to once again acknowledge the Navy's efforts to remove the source. For any questions, please contact me at 617.918.1344 or barry.michael@epa.gov.

Sincerely,


Michael S. Barry
Remedial Project Manager
Federal Facilities Superfund Section

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