



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

February 25, 2002

Mr. Orlando Monaco
Department of Navy
Engineering Field Activity-Northeast
Code 1823/OM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Site 7 Proposed Remedial Action Plan
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP) has reviewed the Proposed Remedial Action Plan (PRAP), version February 2002. Based on that review the Department has the following comments and editorial changes.

General Comments:

1. As discussed in a recent telephone conversation, it is critical that for the Navy to finalize the Summary Report of the Ground-water and Soil Investigations for Site 7 so that it may become part of the Administrative Record and be reviewed by the public.
2. If the cadmium was mobilized by the disposal of acid, has the Navy considered neutralizing the groundwater to aid re-adsorption of the cadmium? This would provide a permanent solution and meet more of the CERCLA criteria. Obviously it would not be without cost. Monitoring and hydraulic control would be necessary. The Navy should consider this option and possibly include in as a third alternative.

Specific Comments:

3. Introduction, 1st para, 2nd line:
Site 7 is the Old Acid/Caustic Pit. Please correct.
4. Introduction, 2nd para, 5th line:
Restoration Advisory Board meetings are no longer held on a quarterly basis. At best they are semi annual. Please correct.
5. Column 1:
A new bullet should be added which reads "Update information contained in the Remedial Investigation issued in 1990 with the results of subsequent investigations."

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

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6. Adding a box with remedial component bullets would be an improvement to members of the public that may want just a brief synopsis.
7. "Limited Groundwater Monitoring" needs to be changed to Groundwater Monitoring or Navy needs to be very clear on what is meant by Limited Groundwater Monitoring. In any event, if the Navy means to limit the monitoring in term, periodicity or both, this should be discussed in the PRAP.
8. Since the Institutional Controls (IC) are a key part of this remedial action the IC boundaries must be shown on the site map.
9. Page 3, Proposed Remedial Action, Column 1, Bullet 2:
 - a.) MEDEP recommends the following language: "The investigation work has shown elevated cadmium levels in groundwater as the contaminant of concern."
 - b.) Another item below this should read: "Extensive investigation have not identified the source responsible for cadmium in Site 7 groundwater."
10. Page 3, Proposed Remedial Action, Column 1, Bullet 4:
 - a.) MEDEP recommends the following language: "Post-removal sampling efforts continue to show elevated levels of cadmium in groundwater, still marginally above the Federal Maximum Contaminant Levels and State Maximum Exposure Guidelines."
 - b.) MEDEP also recommends removing the last sentence of this bullet since it a component of the proposed remedy and not a fact on which the remedy was selected.
11. Page 3, Site History, Column 1, para 3:

According to the Remedial Investigation (RI) Report in addition to being the Old Acid/Caustic Pit this area was the site of the Defense Reutilization and Marketing Office. This information needs to be included in this section.
12. Page 3, Summary of Investigations, Column 1, 1st para:

The acronym NACIP can be deleted without effecting the value of the sentence, otherwise it needs to be written out in full.
13. Page 4, Site History, Column 1:
 - a.) The sequencing between the 1985 report with "no evidence of groundwater contamination" and the current situation needs to be resolved.
 - b.) There should be a summary of results provided after the 1988 RI/FS and the 1989 RI/FS. Also it needs to be clear that this is a groundwater site and not a soil site and how that was determined.
14. Page 4, Site History, Column 1, Summary Report of the Ground-water ...1st sentence:

This work was performed in two phases during 2000 and 2001. MEDEP recommends revising the sentence as follows: "In 2000 and 2001 the Navy conducted a phased field investigation ..." The last sentence in this paragraph can then be deleted.

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15. Page 4, Site History Column 1 & 2, Phase I:

Please revise the third sentence as follows: "The cadmium concentration initially increased to 50 ppb then fell to 22 ppb in concentration during the pumping, which still remain above the MCLs/MEGs."

16. Page 4, Site History Column 2, Phase 2:

1st sentence: MEDEP recommends the following language: "Following the pump test, the Navy completed additional investigations to assess whether an isolated man-made or natural source of cadmium was present in the soils."

Last sentence: MEDEP recommends the following language: "The excavation encountered metal debris and substantial organic material either or both which could be contributing to the cadmium concentrations observed."

17. Page 4, Summary of Remedial Alternatives, Item 2:

The remedies proposed do not reduce the contaminant of concern, therefore please revise as follows: Monitor groundwater concentrations of cadmium until MCLs and MEGS are consistently met.

18. Table 1:

a.) Five year reviews must be added to alternative 2 components.

b.) Bullet 1 should be revised to read "Institutional controls will limit excavation at Site 7 and restrict the pumping and use of groundwater.

19. Page 5, Column 1, Alternative 2, Para 1:

There was no indication that the levels of cadmium have gone down. Therefore, please revise as follows: "After defining this area, a removal action was conducted in an attempt to close out the site with no further action, however the cadmium levels still remained above the MCLs/MEGs."

20. Page 5, Column 1 Alternative 2, para 2:

a.) Please revise as follows: "To prevent exposure to this isolated area of shallow groundwater, the Navy will establish institutional controls preventing the excavation of soil and pumping or use of the groundwater."

b.) Please provide more information on the institutional control; identify what document will contain the Institutional Controls for this site and how they will be administered.

c.) It is also unclear exactly where the institutional boundaries are proposed to be. The term "area" is used throughout the document which indicates that only the area of groundwater contamination is proposed for institutional controls. If this is the case, than the Navy must proposed a buffer and provide a justification for how the buffer was determined. The area would need to be surveyed and permanent markers installed. Or is it all of Site 7? This needs to be clarified.

