



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
NEW ENGLAND - REGION I  
1 CONGRESS STREET, SUITE 1100 (HBT)  
BOSTON, MASSACHUSETTS 02114-2023

March 27, 2002

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: Revised Draft Proposed Remedial Action Plan (PRAP), Site 7 (OU7),  
Naval Air Station Brunswick, Maine**

Dear Mr. Monaco:

Thank you for the opportunity to review the above referenced document, which was submitted by EA Engineering, Science and Technology on behalf on the Navy on March 26, 2002. This letter formally submits EPA's comments, which I sent by email yesterday.

The revised draft PRAP reads well and overall conveys the required information completely and concisely; it resolves the vast majority of EPA's comments to the draft PRAP in my letter of February 28, 2002. Our only remaining overall comment is that the reason why action was undertaken despite the risk assessment finding of "no CERCLA risk" on the RI should be more explicitly stated. Details are attached.

I understand the tight schedule for the PRAP and fully support the target final PRAP release date of April 1, 2002. For any questions, please contact me at 617.918.1344 or [barry.michael@epa.gov](mailto:barry.michael@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "M. Barry", written over a horizontal line.

Michael S. Barry  
Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc. Al Easterday/EA ([aeasterd@eaest.com](mailto:aeasterd@eaest.com))  
Carolyn LePage/LePage Environmental ([clepagegeo@aol.com](mailto:clepagegeo@aol.com))  
Claudia Sait/ME DEP ([claudia.b.sait@state.me.us](mailto:claudia.b.sait@state.me.us))  
Tony Williams/NASB ([WilliamsA@nasb.navy.mil](mailto:WilliamsA@nasb.navy.mil))

Attachment  
US EPA Comments to  
Revised Draft PRAP, Site 7, NAS Brunswick, ME

1. Summary of Investigation Section; Top of Second Column on page 4. The reason why action was undertaken despite the risk assessment finding of "no CERCLA risk" and the FS determination of "No Further Action" should be more explicitly stated. Also in this section:
- a. Since it was stated in the August 1990 RI (Section 9.5, Page 9-20) that cadmium was detected between 8 and 15 ppb in MW-704 (later designated MW-94), the sentence stating that cadmium not detected above the MCL should be struck.
  - b. We understand the point the PRAP strives to get across (no CERCLA risk finding), but these two paragraphs get wordy and don't flow as well as the rest of the PRAP.
  - c. We offer the below suggested revised first three paragraphs as a possible solution. EPA is not fixed upon this specific wording, any revision that addresses the basis of our comment is acceptable. Changes are in bolded italics and underlined.

"Ground-water sample data indicate that cadmium was the only inorganic detected at concentrations exceeding the Federal MCL for cadmium in wells MW-NASB-094 (formerly identified as MW-704) and MW-NASB-096 (formerly identified as MW-706). *(Deleted sentence)*. A baseline risk assessment evaluated risks associated with repetitive direct contact and incidental ingestion exposure incurred by young children who may trespass and/or play in this area. *For that reason*, the RI/FS concluded that there are no human health risks associated with exposure to contaminants detected in the surface soils or ground water at Site 7 *based on current and assumed future exposure conditions.*"

*"Since the baseline risk assessment did not indicate a risk to either human health or the environment, and in accordance with EPA guidance, the RI/FS recommended a No Action Alternative for the site as providing an adequate level of protection."*

**Summary Report of the Ground-Water and Soil  
Investigations at Site 7 (EA 2002a, b)**

*In order to meet regulatory requirements and despite the results of the risk assessment and RI/FS recommendation*; the Navy conducted a phased field investigation effort in 2000-2001 to search for and remove the source of *continuing* cadmium contamination *above the federal MCL/state MEG* in the ground water at Site 7.

**Phase I – Pump Test/Ground-Water Sampling**  
continue as written....

2. (Editorial) On figure text box marking the area of cadmium exceedances, request adding the "FEDERAL MCL" to the "STATE MEG"; or just leave as "EXCEEDANCES".