



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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July 03, 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-Draft Record of Decision
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the draft Record of Decision for Site 7, dated June 2002, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments.

1. The Navy needs to review and revise the Record of Decision (ROD) for Site 7 to be consistent with the Proposed Remedial Action Plan published 29 March 2002 and presented to the public on 9 April 2002. In the PRAP the Navy's Proposed Remedy is stated as follows: "The Navy recommends that the Alternative 2, Institutional Controls with Ground-water Monitoring and 5-year site reviews, be implemented at Site 7. This remedy includes institutional controls to prevent human exposure to cadmium in the ground water, and a ground-water monitoring program to ensure this localized contamination remains isolated and concentration trends over time are monitored and documented. During 2002, the Navy will evaluate different technologies, such as phytoremediation or ground-water neutralization, to optimize the remedy at Site 7 to accelerate the closure of this site and report their findings to EPA, MEDEP, and the Restoration Advisory Board.... An irreversible reduction in the toxicity and volume of contamination will occur as a result of this alternative's reliance upon natural attenuation process...." The evaluation of different technologies and more emphasis on natural attenuation needs to be included in the ROD so that it is consistent with the PRAP.
2. Please add north arrows to figures 2-2, 2-3, and 2-4.
3. Soil contamination and institutional controls for soil are mentioned here and there throughout the ROD however it is unclear if this is a result of copying a previous ROD (Site 9). A review of the Remedial Investigation for site 7 indicates that PAHs and DDT were found at low levels in soil. Therefore the ROD needs to be cleansed of extraneous mention of soil contamination and land use restrictions on soil and needs a clear explanation why there are no concerns regarding soils at this site. The confusion is compounded by the fact that soil contamination and institutional controls for soils are mentioned occasionally in the PRAP (Pg 1 and 7). EPA may need to clarify how to proceed if institutional controls on soils are not to be included in the selected remedy.

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4. MEDEP would like a copy of the Responsiveness Summary (Appendix A) and Written Comment Letters on the Proposed Remedial Action Plan provided prior to the Final ROD. With the number of revisions and clarifications requested please submit a draft final copy of the ROD for review and comment.

Specific Comments:

5. Page 1-1, Section IV;

2nd sentence: "The following major components of the selected remedy are needed to address soil and ground-water contamination at Site 7:"

Bullet 1: "Implement institutional controls, such as land use restrictions, to prevent human contact with and use of the ground water at the site."

See comment 3 above.

6. Page 1-1, Section IV;

Some mention of natural attenuation should be included here to be consistent with the PRAP.

7. Page 1-2, Section V, para 2:

a.) Please revise sentence 2 as follows: "After defining this area, a removal action was conducted in an attempt to close out the site with no further action; however, cadmium concentrations in groundwater still remain above the Federal Maximum Contamination Level and State Maximum Exposure Guideline of 5 ppb."

b.) Please revise sentence 5 as follows: *Due to the small isolated area of groundwater contamination and ~~Therefore~~ since the groundwater is neither a current or a significant potential future water source, it was concluded that it was more cost effective to utilize determined that institutional controls as the remedy with monitoring would be protective and more cost effective.*

c.) In the last sentence please replace "Thus" with "However,..."

8. Page 2-3, Section II. A.1., Future Land Use, para 1:

a.) "Future land uses at Site 7 are likely to remain the same."

It is unclear what is meant by "the same". If the land use is to remain undeveloped, please specify.

b.) "Ground water is not used as a potable or domestic source and is not expected to occur."

Please add a subject to the second part of this sentence.

9. Page 2-3, Section II.B:

a.) Bullet 2: Please revise as follows: "In 1984, a Pollution Abatement Confirmation Study recommended further investigation of 7 of *the* 10 Initial Assessment Study sites, including the old acid caustic pit site..."

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b.) Bullet 4: Please reference E.C. Jordan Co. 1990 in this statement.

10. Page 2-4, Section II.B:

a.) Bullet 5: Please delete this bullet which pertains to Site 9 not Site 7.

b.) Bullet 7: Please confirm that the new well is located to the northeast of the existing well network. MEDEP believes it lies more to the east. Also, please add the cadmium concentration for comparison purposes.

c.) Bullet 8: Please add the cadmium and manganese concentrations for comparison purposes.

11. Page 2-5, Section II.B, Bullet 2:

The cadmium levels need to be summarized here since it is important that the public know how the contamination reacted after the pump test.

12. Page 2-6, Section III, Public Outreach Results, Bullet 2:

“Quarterly RAB update newsletters, reaching up to 150 people.”

Please recheck this statement for accuracy. MEDEP has not received an updated newsletter in years. Revise as appropriate.

13. Page 2-7, Section IV.A.1:

“Ground-water sampling data indicate that cadmium concentrations are generally steady or have decreased over time;...”

The concentrations of cadmium in groundwater have not decreased over time but increased after the pumping test or remained steady. Please revise.

14. Page 2-7, Section IV.A.2., Summary:

a.) “Site 7 ground water is currently inaccessible.”

The groundwater is not inaccessible; it is however unused. Please revise.

b.) “The utilization of natural attenuation will reduce contaminant concentrations in the site ground water over time, and the establishment of institutional controls will protection human health by preventing contact with impacted media.”

The term “utilization” indicates some active process on the Navy’s part. Please revise as follows: ~~The utilization of~~ Natural attenuation will reduce contaminant concentrations in the site ground water over time, and the establishment of institutional controls will protect human health by preventing *the use of and* contact with impacted media.

15. Page 2-8, Section IV.B.1., Bullet 1:

“Within a reasonable time after the signature of this ROD, the Navy will provide a draft version of these ground-water restrictions...”

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A timeframe for providing the final groundwater use restrictions must be supplied. CERCLA requires a 15 month timeframe for enacting a remedy, therefore a final groundwater use restriction for Site 7 must be in place within 15 months after the signing of this ROD.

16. Page 2-11, Section V.D.3., Ground Water, Bullet 2:

"Monitoring data report cadmium concentrations are generally steady or have decreased over time ..."

The concentrations of cadmium in groundwater have not decreased over time but increased after the pumping test or remained steady. Please revise.

17. Page 2-11, Section V.D.3., Soil:

a.) This section needs to be expanded to better explain why soils are not an issue at Site 7 (See comment 3 above.) MEDEP suggests summarizing the information in Feasibility Study, section 7.2, pages 7-5- 7-7.

18. Page 2-12, Section V.D.3., Soil:

"The volume of the landfill material is approximately 40,000 yd³."

This statement appears unrelated. If it is relevant to site 7, it needs to be tied in better with the rest of the paragraph.

19. Page 2-12, Section V.D.3., Ground Water and Other Media:

"Plume migration of contaminated ground water does not have the potential to impact other media, including leachate, stream sediment, and surface water."

It is unclear why leachate is included in this statement. Please recheck and revise as necessary.

20. Page 2-14, Section VII.A., Human Health Risk Assessment:

This section on the Human Health Risk Assessment needs to include information on soil to help explain why the soil does not pose a health risk.

21. Page 2-17, Section VIII. Remediation Objectives, Bullet 2:

Depending on the outcome of comment 3 above it may be necessary to include "prevent expose to soil" in this statement.

22. Page 12-19, Alternative 2:

Depending on the outcome of comment 3 above it may be necessary to include institutional controls for soil.

23. Page 12-19, Section IX.B.1., Ground-Water Contamination, Bullet 3:

"Within a reasonable time after the signature of this ROD, the Navy will provide a draft version of these ground-water restrictions..."

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A timeframe for providing the final groundwater use restrictions must be supplied. CERCLA requires a 15 month timeframe for enacting the remedy. Therefore a final groundwater use restrictions for Site 7 must be in place within 15 months after the signing of this ROD.

24. Page 12-19, Section IX.B.1., Ground-Water Contamination, Bullet 4:

“Develop and Implement a Long-Term Monitoring Program.”

A timeframe for developing and implementing a Long Term Monitoring Program should be supplied. CERCLA requires a 15 month timeframe for enacting the remedy. Therefore a final groundwater use restriction for Site 7 must be in place within 15 months after the signing of this ROD.

25. Page 2-20, Section IX.B.2., Applicable or Relevant and Appropriate Requirements:

Please add “Guidance Manual for Conducting Human Health Risk Assessment at Hazardous Substance Sites” (June 1994) and Draft Interim Maximum Exposure Guidelines (Bureau of Health, Maine Department of Human Services, January 3, 2000) to the To Be Considered list. Also please add 38 M.R.S.A. 465-C, Maine Classification of Waters Program-Groundwater and Classification of Maine Waters (§464 (4)(A)(1) to chemical specific. These also need to be added to Section XI.C.4.

26. Page 2-29; Section XII.A., para 1:

“The remedy at this site will adequately protect human health and the environment by eliminating, reducing or controlling exposure to human and environmental receptors through natural biological processes and institutional controls and the long term monitoring.”

Please change biological processes to chemical processes.

27. Page 2-29; Section XII.B.:

Please see comment 25 above.

28. Page 2-31, Section XII.D., para 2:

The institutional controls that will be implemented as part of the remedy rely on natural biological processes to dilute and degrade chemical contaminants over time.”

Please change biological processes to chemical processes.

29. Page 2-32, Section XIII:

“The Navy presented a Proposed Plan of natural attenuation with long-term monitoring and institutional controls for remediation of site 7 on 9 April 2002.”

To be consistent with the wording in the PRAP the remedy is Institutional Controls with Ground-Water Monitoring. This sentence should be reworked to indicate the same proposed remedy as presented in the PRAP.

30. Table 2-1:

Please review the second column under Soil which mentions Building 201 which is Site 9.

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31. Table 2-2:

Table 2-2 lists Aroclor 1254 concentration ranging from 26.25 to 315 ppm and 4,4 DDT ranges from 53.96 to 340 ppm. A review of the risk assessment in the Feasibility Study (March 1992) indicates that these figures may have misplaced decimal points. Please review the table for accuracy and provide MEDEP with the analytical sheets for PCBs and DDT for Site 7 for verifications of the units. (Also Frequency of Detection should be checked for accuracy. How can there be two concentrations for Aroclor 1254 yet only show 1/12?)

32. Tables 2-3:

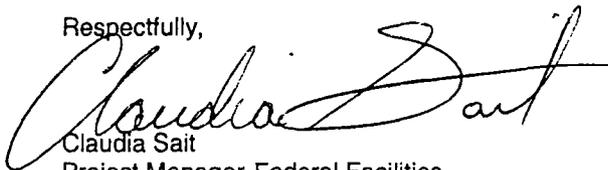
Please verify that EPA has not changed toxicity factors and weight of evidence since the 1990 Remedial Investigation.

33. Table 2-3, 2-4 and 2-5:

Although the source for the information in these tables is shown as the Remedial Investigation E.C. Jordan Co. 1990) there is information more recent than 1990. The sources should be listed. Did the new information have any impact on the outcome of the risk assessment?

It maybe most time efficient to have a conference call on some of these comments, if you like to set a conference call please call me at (207) 287-7713 or email me at claudia.b.sait@state.me.us

Respectfully,



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