



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

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August 11, 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 Focused Feasibility Study
Site 8
Naval Air Station Brunswick
Brunswick, Maine

Dear Jim:

The United States Environmental Protection Agency (EPA) has received and reviewed the document entitled "Draft Final Focused Feasibility Study (FFS) - Site 8" dated August 1991. Attachment I to this letter contains comments pertaining to this document.

As has been conveyed to the Navy, EPA cannot concur with the proposed target clean-up level of 18 ppm for carcinogenic PAHs as outlined in the report. The Navy has agreed to discuss this issue further at a meeting on October 3, 1991 at 1:00 PM. EPA recommends that we discuss any other outstanding issues pertaining to Site 8 at this time.

Please contact me at (617)573-5785 to discuss any of the comments provided further.

Sincerely,

Meghan F. Cassidy
Remedial Project Manager

Enclosures

cc: Eileen Curry/NASB
Mel Dickenson/EC Jordan
Ted Wolfe/ME DEP
Ann Johnson/SAIC
Mary Jane O'Donnell/US EPA
Jui-yu Hsieh/US EPA
Bob DiBiccaro/US EPA



ATTACHMENT I

The comments provided below pertain to the report entitled "Draft Final Focused Feasibility Study, Site 8" (August 1991). The report was submitted by the U.S. Department of the Navy for the Naval Air Station Brunswick in Brunswick, Maine.

SECTION 2.0 - SUMMARY OF RESPONSE OBJECTIVES AND REMEDIAL ALTERNATIVES

1. Page 2-4, Paragraph 3: The response to comments states that a maximum concentration of 0.008 mg/kg of DDT was detected in the soils however, this paragraph indicates that the maximum concentration was 0.08 mg/kg. Clarify this discrepancy. Also clarify what Hazard Index associated with the correct value is.
2. Page 2-5, Paragraph 1: Summarize the history of cadmium detection in the text.
3. Page 2-6, Paragraph 3: This paragraph states that "remedial action objectives were developed to reduce exposure to or concentrations of cyanide, aluminum, iron and lead in surface water." However, this directly contradicts paragraph 4 on page 2-13 and paragraph 2.4.3 on page 2-29.
4. Page 2-11, Table 2-2: This table states that Maine MEGs have been promulgated, and are Relevant and Appropriate. Maine MEGs have not been promulgated and therefore should have a status of To Be Considered.
5. Page 2-13, Paragraph 4: This paragraph states that concentrations of lead, iron and cyanide exceed AWQC in surface water. However, this FFS does not address surface water. EPA considers AWQC as ARARs and cannot concur with a remedy which will not attain ARARs or will not meet the criteria for an ARAR waiver. Further discussion regarding this issue is needed.
6. Page 2-13, Paragraph 6: Clarify in the text why the surface water bodies of the western drainage area only would be regulated by ARARs that pertain to streams and wetlands.
7. Page 2-25, Paragraph 2: When commenting on the Draft Focused Feasibility Study for Site 8, EPA stated that background levels for PAHs must be calculated for Site 8 soils specifically. This apparently was not done since the text as presented in the draft final report still refers to background samples taken at Sites 1 and 3. The Navy must present background levels calculated using Site 8 soil information. Given the information provided, the target clean-up level of 18 ppm for carcinogenic PAHs is not appropriate. EPA will not concur on a target clean-up level for carcinogenic PAHs until such time that all of the requested information is provided.

8. Page 2-26, Table 2-5: Some of the exposure assumptions used to derive the clean-up level for Site 8 are different from the exposure assumptions used in the risk assessment as shown in Appendix Q of the RI report. The different assumptions used in Appendix Q are:

Amount of soil ingested: 0.1 g/day
Amount of soil contacted: 0.5 g/day
Exposure frequency: 8 days/year
Fraction of carcinogenic PAH absorbed dermally: 20%

An explanation of these differences or a correction is required before EPA can concur on any target clean-up level.

9. Page 2-27, Table 2-6: The following corrections to the table should be made.
- Use equal signs (=) instead of hyphens (-) in equations on lines 1, 2 and 3.
 - In the bottom equation, the unit listed on the right is not equal to the unit on the left.
 - Recalculate the target clean-up level if the exposure assumptions are incorrect.
10. Page 2-29, Paragraph 3: This paragraph does not agree with paragraph 3 on page 2-6 which states that remedial action objectives were developed for surface water. Further, as stated in comment No. 5 above the exceedance of AWQC must be discussed further.

SECTION 3.0 - DETAILED EVALUATION OF REMEDIAL ALTERNATIVES

11. In the ARAR discussion for each alternative, the report states that there are no chemical specific and no location specific ARARs for Site 8 (in connection with PAH). However, chemical specific and location specific ARARs in connection with iron, lead, cyanide and aluminum have not been addressed.
12. Page 3-1, Paragraph 3: EPA recommends that this paragraph include a statement stating that "The State is a party to a Federal Facility Agreement and has had the opportunity to review and comment on this FFS."
13. Page 3-23, Paragraph 5: This paragraph states that there is little expected difference in the overall protection of human health between this alternative (Alternative 8-D) and Alternative 8-C. The text should include language to explain why this is true.

APPENDIX C

Response to EPA Comments Dated June 17, 1991

Section 2.0 - Summary of Response Objectives and Remedial Alternatives

14. Page C-16, Response 9. Indicate whether the sum of all DDT positive detects was divided by the total number of DDT samples or all positive detect samples. Also, include a reference to the DDT detection limit.
15. Page C-16, Response 12. Jordan's response to this comment is analogous to Response 11. A discussion of the location of background samples for total and carcinogenic PAHs is included in the narrative. However, the referenced PAH concentration range of 1.8 to 21.9 mg/kg has been changed to 1.97 to 7.35 mg/kg. Explain this change.
16. Page C-16, Response 13. This comment has not been addressed. Provide information on how the PAH concentrations in surface water/sediment samples were compared to surface soils. Also, provide a rationale why test pits in the vicinity of Site 8, which exhibited no detectable concentrations of PAHs, are not considered background.
17. Page C-16, Response 14. A specific discussion concerning an ARAR waiver as they relate to Ambient Water Quality Criteria should be presented in Section 2.4.2 (Page 2-29).
18. Page C-16, Response 15. This comment appears to have been addressed, but a reference to the location of the background iron and aluminum concentrations is needed in the text.

Section 3.0 - Detailed Evaluation of Remedial Alternatives

19. Page C-18, Response 33. A statement indicating that local governments will cooperate with the Navy in the implementation of deed restrictions should be included in Paragraph 5 on Page 3-9.
20. Page C-19, Response 49. A reference to a nearby monitoring well would provide a more definitive location of the steep bank, since Figure 3-6 does not show topographic contours.
21. Page C-19, Response 50. Stabilization agent information can be obtained from EPA references and other professional publications and should be provided in the text.
22. Page C-19, Response 56. Provide a statement as to whether the stabilized soil that has failed the TCLP or other tests can be subjected to further on-site treatment rather than disposing of material off site as indicated in Figure 3-5 on Page 3-20.

23. Page C-20, Response 57. The leachate controls should be referenced in Paragraph 2 on Page 3-24.

Section 4.0 - Comparative Analysis of Alternatives

24. Page C-20, Response 64. State in Paragraph 1 on Page 4-3 that leachate controls are required for Alternative 8D.