



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

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NAS BRUNSWICK  
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August 31, 1992

Mr. James Shafer  
Northern Division  
Naval Facilities Engineering Command  
Code 1821/JS  
10 Industrial Highway  
Mail Stop #82  
Lester, PA 19113-2090

Re: Proposed Plan  
Site 8  
Naval Air Station Brunswick  
Brunswick, Maine

Dear Mr. Shafer:

The United States Environmental Protection Agency (EPA) has received and reviewed the "Proposed Plan, Site 8, Perimeter Road Disposal Site" dated August 1992, for the Naval Air Station Brunswick in Brunswick, Maine.

EPA's comments pertaining to this document are as follows.

1. Page 1-1, ¶ 3: Revise the second sentence of this paragraph to read as follows.

"Although solvents were reportedly disposed of at this site, results of the RI did not show the presence of any solvent-related compounds."

2. Page 2-2, ¶ 2: The text should be clarified to indicate that the site cleanup referred to relates to Site 8 only.
3. Page 4-2, ¶ 1: The last sentence of this paragraph should be deleted and replaced by the following.

"This upper bound estimate of  $3 \times 10^{-4}$  is based on conservative exposure assumptions (i.e., long-term repetitive exposure to the maximum detected concentration), and a limited number of contaminants of concern (i.e., only PAHs). While this estimate is not considered to represent a significant health risk at Site 8 it does warrant action based on EPA guidance."

4. Page 4-3, ¶ 2: Include a statement in the text regarding the actual risk presented by the contaminants in surface water.



5. Page 5-1, Section 5.0: The last two paragraphs of this section should be combined into a single paragraph, and this new paragraph should become the lead paragraph of this section.

6. Page 5-1, existing ¶ 1: Revise the last sentence to read as follows.

"Since these contaminants are not related to Site 8, specific remedial actions taken to reduce contaminant concentrations emanating from Site 8 are not warranted and would not be effective in reducing potential exposure concentrations."

7. Page 5-1, existing ¶ 2: Include a sentence, before the last sentence, which indicates that the cadmium is believed to be associated with the strata in the area.

8. Page 6-1, ¶ 3: This paragraph references two Maine state requirements. The text must clarify which is the ARAR. Also, indicate why the second requirement is included. Is this a more stringent requirement?

9. Page 6-1, ¶ 3: Clarify in the text whether the Maine regulations for closure of attenuation landfills is more stringent than the actual ARAR.

10. Page 8-2, ¶ 1: Again, clarify in the text why two different Maine regulations are cited. Which is the ARAR? Why does the preferred alternative include a more stringent requirement?

11. Page 8-2, ¶ 3: Rewrite the second sentence as follows.

"Similarly, remedial action at Site 8 would not reduce inorganic contaminant concentrations below AWQCs in surface water since other nonpoint source areas would still exist."

12. Page 8-2, ¶ 5: The last sentence of this paragraph should be moved and follow the existing first sentence.

13. Page 8-5, ¶ 2: The first sentence of this paragraph should read as follows to be consistent with earlier proposed plans.

"The State of Maine has reviewed this Proposed Plan and has provided comments and recommendations."

Should you have any questions regarding these comments please contact me at (617)573-5785.

Sincerely,

*Meghan F. Cassidy*

Meghan F. Cassidy  
Remedial Project Manager

cc: ~~Greg Apraham/NAS Brunswick~~  
Bill Weber/ABB Environmental  
Mark Hyland/ME DEP  
Ann Johnson/SAIC  
Rene Bernier/Topsham  
Sam Butcher/Harpswell  
Susan Weddle/Brunswick  
BASCE Group