

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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



May 25, 1993

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

Re: Draft Record of Decision
Site 8 - Perimeter Road Disposal Site
Nas Brunswick

Dear Jim:

The United States Environmental Protection Agency (EPA) has reviewed the document entitled "Draft Record of Decision for a Remedial Action at Site 8, Naval Air Station Brunswick, Brunswick, Maine" dated May 1993.

EPA's comments regarding this document are provided in Attachment I to this letter. Upon satisfactory response to our comments, EPA anticipates that we will provide concurrence on this ROD.

In order to facilitate the finalization of the ROD, EPA recommends that a meeting or conference call be scheduled to discuss the attached comments and the Navy's responses. Please contact me at (617)573-5785 to arrange such a meeting/conference call.

Sincerely,

A handwritten signature in cursive script that reads "Meghan F. Cassidy".

Meghan F. Cassidy
Remedial Project Manager

Enclosures

cc: Nancy Beardsley/ME DEP
Jim Caruthers/NASB
Beth Walter/ABB
Susan Weddle/BASCE
Sam Butcher/Harpswell Community Rep.
Rene Bernier/Topsham Community Rep.
Bob DiBiccaro/EPA
Bob Lim/EPA



ATTACHMENT I

The following are EPA's comments pertaining to the document entitled "Draft Record of Decision for a Remedial Action at Site 8, Naval Air Station Brunswick, Brunswick, Maine" dated May 1993.

1. Page 2, ¶ 4: The description of the selected remedy indicates that the alternative involves excavation of both debris and contaminated soil. Provide some additional details, in the text, on why disposal of contaminated soil as subgrade material for the Sites 1 and 3 landfill is justified. For example, indicate that the landfill at Sites 1 and 3 will be closed in accordance with all applicable Federal, State and local regulations, and that long-term monitoring will be implemented.
2. Page 3, ¶ 1, 4th line: The phrase "Sites 1 and 3" should be inserted before the word landfill in this line for clarity.
3. Page 5: EPA will keep the Navy informed as to how the EPA signature block should be written as finalization of the ROD progresses.
4. Page 6, ¶ 1: The text refers to 13 areas (sites) that are currently under investigation. This number does not reflect sites that have been added to the program over the past several years. The text should be revised to reflect the actual number of sites being addressed/investigated under the Installation Restoration Program.
5. Page 8, ¶ 3: Were reports of solvent disposal obtained from actual records or verbal reports only. EPA seems to recall that they were verbal reports only. If this is the case specify this in the text.
6. Page 11, ¶ 2, 3rd sentence: Revise the second part (following the semi-colon) to read as follows.

"however this disposal and these quantities cannot be confirmed."
7. Page 12, ¶ 1: The phrase "consistent with blank contamination" may not be understood by most readers. Revise the text to explain this concept more fully.
8. Page 12, ¶ 1, last sentence: The last sentence of this paragraph should be rewritten as follows.

"No other volatile compounds were detected, indicating that only small amounts were disposed of at the site; the compounds have been flushed or volatilized out with time; or disposal of these materials did not occur at Site 8."

9. Page 13, 1st bullet: The text refers to seven sites. Since no reference has been made previously to seven site, these sites should be identified.
10. Page 13, last bullet: The text summarizes reports completed to date. However, no reference is made to the Focused Feasibility Study for Site 8. Include this document in the discussion.
11. Page 14, 1st bullet: The text refers to 13 areas (sites) that are currently under investigation. This number does not reflect sites that have been added to the program over the past several years. The text should be revised to reflect the actual number of sites being addressed/investigated under the Installation Restoration Program.

In addition, the text refers the reader to Figure 1 after indicating that there are 13 sites under investigation. Figure 1 does not show these sites as indicated. Correct this discrepancy.

12. Page 22, ¶ 3: This paragraph indicates that the Jordan Avenue Wellfield is located 1,800 feet northwest of the site. Page 10, paragraph 1, says the wellfield is 3,000 feet from Site 8. Clarify this discrepancy.
13. Page 23, ¶ 2: The last sentence of this paragraph refers to an MCL for lead. The appropriate comparison for lead is the 15ppb action level.
14. Page 23, ¶ 3: The last sentence of this paragraph should be rewritten as follows.

"The high concentrations of inorganics occurred in unfiltered samples from these wells and are consistent with the clay-rich geologic media at the site rather than being associated with the disposal material."

15. Page 24, 2nd sentence: This sentence refers the reader to Figure 3 relative to the three seep locations. However, the locations of the seeps are shown on Figure 2, not Figure 3.
16. Page 26, ¶ 2: EPA believes that the salt pile has been moved from the old runway area south of Site 8. If this is the case, the following changes need to be made in this paragraph.

- The second sentence of the paragraph should state "A salt pile was located on the old runway (paved area) south of Site 8, ..."

- The last sentence of the paragraph should be deleted and a new one inserted indicating that the pile has been relocated. If such a sentence is added, the text should also summarize the current management of the pile (i.e., covered building, concrete floor, etc.).
17. Page 28, ¶ 3: The first sentence of this paragraph should be revised to read as follows.

"Because access to this site is not controlled,..."
 18. Page 28, ¶ 3, 3rd sentence: Define the age group for an older child as referenced in this sentence.
 19. Page 29, Table 1: The note refers to Appendix A; however, Appendix A is the Responsiveness Summary.

Under Leachate Sediment, it appears that Aroclor 1240 should be removed from the table since in Appendix Q of the Draft Final RI Report, Aroclor 1240 has not been evaluated.
 20. Page 28, ¶ 3: In order to clarify some points in the exposure assessment section, include the ages of the "older child" evaluated in the current land use scenario. In addition, state in this section that the exposure routes which were evaluated in the risk assessment are ingestion and dermal contact.
 21. Page 27, Section VI: According to EPA's Guidance on Preparing Superfund Decision Documents (USEPA, 1989), a brief discussion of significant sources of uncertainty in the risk assessment should be included in Section VI, "Summary of Site Risks". Revise the text to include this discussion.
 22. Page 33, Table 2: The carcinogenic risk numbers as presented in this table will not be understood by the average reader. Since the text writes the cancer risk numbers out in standard scientific notation (i.e., 1×10^{-4}) the table should also use this format.
 23. Page 34, ¶ 1: The last sentence of this paragraph should be rewritten as follows:

"However, since this estimate exceeds EPA's risk range remedial action objectives for soil contamination are warranted to reduce concentrations of or exposure to carcinogenic PAHs in soil."

24. Page 34, ¶ 2: A statement regarding why no remedial action objectives have been established to deal with cadmium in groundwater should be added to the end of this paragraph. The statement should mention sporadic detection, whether cadmium was detected in soil, not site related, etc.
25. Page 35, first line: Concentrations of lead in groundwater should be compared to the federal action level of 15ppb for lead.
26. Page 36: The following sentence should be inserted before the first full sentence on this page.

"Analytes detected in the western tributary are not associated with past disposal practices at Site 8."

27. Page 39, ¶ 3: The E.C. Jordan reference is presented after the NCP. Clarify what the E.C. Jordan reference is for.
28. Page 43: After the breakdown of costs, time, etc. for alternative 8-A, provide an explanation as to what net present worth costs are based on.
29. Page 43, **Alternative 8-B: Minimal Action:** Rather than listing institutional controls, Table 3 shows Fencing/Sign Posting as components of this alternative. The text here should be revised to correspond to Table 3.

Add Five-Year Reviews to the list showing the components of the alternative.

Under the description of this alternative, the text uses the word "landfill" several times. Earlier in the text the site is referred to as a "disposal site". EPA recommends using "disposal site" throughout the ROD and not referring to Site 8 as a landfill.

The proposed environmental monitoring listed for this alternative does not include surface water as a monitored media. Include surface water in the proposed monitoring program.

30. Page 44, ¶ 1: The last line of this paragraph indicates that it was assumed that environmental monitoring would be conducted annually for 30 years. However, the breakdown just below this paragraph indicates that a minimum of five years of monitoring was assumed. Clarify this apparent discrepancy.
31. Page 45, 1st bullet: The word "constructed" should be changed to "construction".

32. Page 45, ¶ 1: EPA does not believe that this was the cover system that the Maine DEP indicated would meet the closure requirements for Site 8 (see pages 6-2 and 6-3 of September 1992 Proposed Plan). This section of the ROD should be revised to correspond to the Proposed Plan that was released to the public during the first public comment period.
33. Page 45, ¶ 3: Include a statement regarding five-year reviews in the text. Also, provide the same level of detail regarding the environmental monitoring program as is provided under the other alternatives.
34. Page 47, ¶ 1: The last portion of the last sentence should be revised to read as follows.

"...and documented in the ROD for Sites 1 and 3 (June 1992)."
35. Page 47, ¶ 2, and Page 63, ¶ 2: Some additional details should be provided on the confirmation sampling program. This information should include the media that will be sampled, the parameters that will be analyzed, and the approximate locations where environmental samples will be collected.
36. Page 52, 2nd line: The word "hearings" should be changed to "hearing", and "public comment period" should be changed to "public comment periods".
37. Page 52, ¶ 2: The sentence regarding community acceptance should be made into a separate paragraph. A statement regarding the change in the selected remedy based on comments received should then be added to this new paragraph.
38. Page 52, ¶ 3: The text states that the comparative analysis can be found in the FFS. However, the preferred alternative presented in this ROD was not included in the FFS. Provide detail on where the comparative analysis for the proposed remedy can be found.
39. Page 53, ¶ 1, second sentence: This sentence should be revised to read as follows.

"The other alternatives, with the exception of the No Action Alternative, would provide a similar degree of protection by preventing or reducing..."

40. Page 53, ¶ 1: Under the discussions of comparative analysis for the criteria of overall protection of human health and the environment, the text should clearly indicate that the selected remedy provides a higher level of protection of human health and the environment than any of the other alternatives. This would provide additional justification for the selection of the alternative.
41. Page 53, ¶ 3: The first sentence of this paragraph refers to the soil cover alternatives. Only one soil cover alternative is included.
42. Page 54, ¶ 3: This paragraph should indicate that soils passed the TCLP test.
43. Page 55, ¶ 3: There is no discussion of the administrative feasibility of each alternative. There should be some mention of the permits that would be required to implement each alternative and the ease of obtaining such permits.
44. Page 57, **Community Acceptance**: A paragraph should be added to this section that explains the change in the preferred alternative based on community input.
45. Page 58, ¶ 1: The term "at Sites 1 and 3" should be added to the end of the last sentence.
46. Page 58, ¶ The text regarding risk being within EPA's risk range must be changed to reflect that the most conservative calculations did result in a risk which slightly exceeded EPA's risk range.
47. Page 60, ¶ 2: Discuss whether there will be materials handling activities such as screening, crushing, etc., required after soils and debris have been excavated from the site and before they are loaded into dump trucks. There is mention in the site characteristics description that construction debris and rubble are expected to be encountered at this site.
48. Page 60, ¶ 4, 2nd sentence: This sentence should be revised to read as follows.

"Increased truck traffic is anticipated on the base."

49. Page 61, Figure 4: The figure shows the excavation area extending across the tributary. The figure must be revised to more adequately reflect the actual extent of the excavation.

Provide more detail in the legend regarding the use of the storage area. Specifically, clarify that it is not a storage area for stockpiling of excavated soil.

50. Page 63, ¶ 1: Provide some additional information on the engineering evaluation that was conducted for the subgrade requirements at Sites 1 and 3. At a minimum, indicate in general terms some of these requirements, e.g., particle size, texture, permeability.
51. Page 63, ¶ 3: The first sentence of this paragraph should be revised to read as follows.
- "After excavation and confirmation monitoring are complete, ..."
52. Page 66, ¶ 2, last sentence: When referring to the noncarcinogenic risk the text should state the levels were "below" the HI rather than "within the HI of 1.0".
53. Page 67, **THE SELECTED REMEDY ATTAINS ARARS**: This section does not meet the purpose and requirements of the model ROD. This section should summarize how the selected remedy will attain each category of ARARs. In addition, the section must explain why an ARAR is applicable, or relevant and appropriate, as well as a why a TBC was considered. Reference the model ROD; the Sites 1 and 3 ROD; and the Interim ROD for the Eastern Plume.
- In addition, a paragraph should be added explaining why RCRA Land Ban Requirements are not ARARs in this situation.
54. Page 70, **The Selected Remedy Utilizes Permanent Solution and Alternative Treatment or Resource Recovery Technologies to the Maximum Extent Practicable**: In accordance with the Region I Model ROD this section should explain why treatment is impracticable.
55. Page 71, ¶ 2: Insert "A small volume of..." at the beginning of the first sentence of this paragraph.
56. Page 71, ¶ 2: Include a statement regarding how the risks associated with the PAHs (i.e., direct contact, ingestion) will be eliminated.

57. Page 71, ¶ 2, last sentence: Clarify, in the text, what physical hazards would be eliminated by the cap.
58. Page 72: Add a statement to the end of this paragraph indicating that in addition to a revised proposed plan being issued, a second public comment period was held.
59. Responsiveness Summary: The word rubble is misspelled in the following responses.
 - Seventh line of response #1.
 - Fifth line of response #2.
 - First and tenth lines of response #4.
 - First line of response #7.
 - Fifth line of response #9.
 - Fifth line of response #12.
 - First and tenth lines of response #13.
 - Fifth line of response #22.
60. Page A-5, 3rd paragraph of response #6: Specify whether the Wastewater Discharge License referred to here is a state or federal license.
61. Page A-5 and A-6, Comment No. 7: Indicate that confirmation sampling would include soil. In addition, to verify the absence of residual hazardous waste, TCLP analyses should be conducted.
62. Page A-9, Response #18: The response should indicate that results of radiological and hazardous screening will be made available to regulators and the TRC.
63. Table D-1: All requirements that are not ARARs should be removed from this table. The only exception to this is RCRA Land Ban Requirements. These requirements should be added to the table.