

WORKPLACE SAFETY & HEALTH ■ REGULATORY COMPLIANCE ■ TOXIC EVALUATION ■ TRAINING ■ PROGRAM DEVELOPMENT

August 10, 1993

Carolyn Lepage
R. G. Gerber, Inc.
17 West Street
Freeport, ME 04032-1133

Dear Carolyn:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), SafeTech Consultants, Inc., has reviewed the risk assessment section of the "Draft Technical Memorandum, Site 9, Neptune Drive Disposal Site" for Naval Air Station Brunswick (NAS Brunswick) located in Brunswick, Maine. It should be noted that SafeTech has not reviewed the remainder of this document except to clarify statements regarding the risk assessment in Section 4.

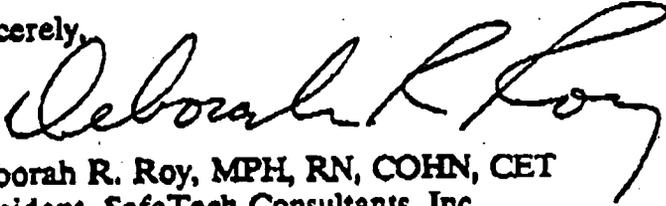
Our comments on the document are as follows:

1. Page 4-4. The discussion of the potential risk for exposure to groundwater states that the Hazard Index is 3.0 for the average concentration due to the presence of manganese, which exceeds the USEPA target of 1.0. No further mention of this is made except that there is no current risk since no one is exposed to groundwater (page 5-4). Has there been consideration of where the contaminated groundwater may travel? Since the Hazard Index well exceeds the USEPA target, why is no action other than institutional controls and monitoring recommended?
2. Page 4-5. The incremental cancer risk from vinyl chloride is said to be at or slightly greater than the USEPA target range, yet no recommendations were made to further investigate the source after the septic system was eliminated as a point source. Vinyl chloride is a man-made chemical and is not found naturally in the environment. It may also be a degradation product, meaning the actual source may be other solvents. Once in the groundwater, it may remain for months or years in its original form. Point sources of the vinyl chloride need to be further investigated before a decision can be made as to the necessary remedial action.
3. Page 4-6. PAH levels averaging 59 mg/kg were found in the southern stream sediments, with the NAS Brunswick background sediment samples indicating a maximum of 21.9 mg/kg. Although we do not know if any feasible remedial action exists to address this contaminated sediment, it would seem reasonable to investigate further what action has been taken at other bases or sites with high levels of PAHs in sediment.

4. **General comment.** We do not feel that there is sufficient data to arrive at the conclusion that no action is needed on Site 9. Sources of VOCs are not clear and assumptions should not be made without some further attempt to identify and therefore remediate point sources.

If I may be of any further assistance, please don't hesitate to give me a call.

Sincerely,



Deborah R. Roy, MPH, RN, COHN, CET
President, SafeTech Consultants, Inc.