



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

July 18, 1994

Mr. Fred Evans
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Draft Record of Decision
for an Interim Remedial Action at Site 9
NAS Brunswick
June 1994

Dear Fred:

The United States Environmental Protection Agency (EPA) has reviewed the above referenced document. The EPA's comments are found in Attachment I of this letter. In addition, the EPA will be forwarding additional Office of Regional Counsel comments by Friday, July 22nd. Should you have any questions regarding the EPA's comments, please feel free to call me at (617) 223-5521.

Sincerely,

A handwritten signature in cursive script that reads "Robert Lim".

Robert Lim, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc. Meghan Cassidy/EPA
Margery Adams/EPA-ORC
Steve Mierzykowski/USFWS
Nancy Beardsley/MEDEP
Jim Caruthers/NASB
~~Elizabeth Walter/ABB-ES (w/ disk)~~
Susan Weddle/BASCE
Carolyn LePage/Gerber, Inc.
Sam Butcher/Harpswell Community Rep.
Rene Bernier/Topsham Community Rep.



ATTACHMENT I

The following are EPA's comments pertaining to the document entitled **Draft Record of Decision for an Interim Remedial Action at Site 9** dated June 1994.

Specific Comments:

1. Cover Page: Consider revising title to: **Draft Interim Record of Decision for the Groundwater Operable Unit at Site 9.**
2. Page 1, ¶ 1, First sentence: Clarify that this is an "Interim Record of Decision."
3. Page 1, Statement of Purpose: The first sentence should indicate that the selected interim action includes groundwater remediation through natural attenuation.
4. Page 1, ¶ 1, Third sentence: Suggest revising to: "Through this document, the Navy plans to monitor natural attenuation and prevent exposure to contaminated groundwater which is a potential threat to human health, welfare, or the environment at Site 9, while conducting additional source investigations."
5. Page 1, ¶ 3: Suggest revising to: "A final remedy and a subsequent ROD for the site including both groundwater and source operable units will be developed after conducting additional investigations."
6. Page 2, Description of the Selected Remedy: The first sentence of this section should read as follows.

"The interim remedial action consists of groundwater remediation through natural attenuation, long-term environmental monitoring, institutional controls and five-year reviews."
7. Page 2, ¶ 2, First sentence: Suggest revising to read: "By implementing this interim ROD, any threats posed by groundwater at Site 9 are addressed by preventing endangerment to public health, welfare, or the environment."
8. Page 3: Replace "Region I" with "New England Regional Office."
9. Page 4: 1) Replace "Region I" with "New England Regional Office"; and 2) Add "P." as middle initial for John DeVillars.
10. Page 5, ¶ 5, Item 1): Add "ash" before "disposal area in the current location of Buildings 218 and 219."

11. Page 10, ¶ 3: Following "Site 9," add "and base" since subsequent information also documents the base's history.
12. Page 11, last ¶ and page 12 top ¶: Add a discussion of regarding natural attenuation here.
13. Page 13, Scope and Role of Response Action: The second sentence of this paragraph should be rewritten as follows.
"... ,but is considered consistent with the final remedy that will be chosen."
14. Page 14, ¶ 3: Suggest revising mention of groundwater levels from "Mean Sea Level" to "Below Ground Surface."
15. Page 15, ¶ 2: The third sentence notes that all compounds except toluene were detected upstream and are a result of runoff from the parking lots. The paragraph does not discuss what the source of the toluene is.
16. Page 15, ¶ 3: This paragraph refers to Picnic Area Pond, however, I do not believe that there has been any reference to this location earlier in the text nor is it shown on the map. Describe Picnic Area Pond and its location in the earlier introductory section.
17. Page 16, ¶ 3: The first sentence of this paragraph discusses source area wells. It is not clear what the source area is considered since the text discusses several potential source areas at Site 9. The location of these wells should be further defined.
18. Page 16, ¶ 3 and 4: This section discusses VOC and inorganic contamination in the groundwater but does not discuss SVOCs. Even if SVOCs were not found, this section should indicate the SVOC analytical results for groundwater.
19. Page 16, Groundwater section: A map should be provided that shows the locations of the monitoring wells.
20. Page 17, ¶ 3: In the first sentence of this paragraph indicate that the two monitoring wells discussed are new monitoring wells.
21. Page 17, last paragraph: It is not clear why the text refers to both "NAS Brunswick and site background concentrations".
22. Page 18, first full paragraph: The first sentence of this paragraph refers to the southern tributary. Up to this point, the text has called this tributary the southern unnamed stream. Use consistent terminology.

23. Page 19, ¶ 3: The second and third sentences indicate that the septic system was at one time the source of the groundwater contamination. This is not supported by the data that are presented. The only conclusion that can be drawn is that the septic system is not currently a source of contamination.
24. Page 19, last paragraph: The information contained in this sentence does not really explain why an interim remedial action for groundwater is appropriate. Consider revising the beginning of the paragraph to:

"The Navy recommended an interim remedial action for the groundwater operable unit at Site 9 because no definitive source area was found. Despite the inability to find a definitive source of the groundwater contamination, the previous investigations have concluded that: the former incinerator and ash disposal area have not contributed to VOC contamination downgradient of the disposal area; the septic system is no longer a source of VOC contamination; and the stream contamination (i.e., PAHs and fuel-related compound) is attributed to runoff from roadways or the incomplete combustion of fuels. This action"
25. Page 19, last paragraph: The last sentence of this paragraph should be rewritten as follows.

"The final Proposed Plan and ROD for Site 9..."
26. Page 24, Table 2: There are missing decimal points in the concentrations for Cadmium and Chromium.
27. Page 28, Alternative 9-B: Revise alternative title and discussion to reflect preferred alternative as found in the Proposed Plan. Costs associated with the alternative are also not consistent with the Proposed Plan.
28. Section VIII. Description of Alternatives: Delete alternatives 9-C through 9-E since they do not apply to this remedial action which only encompasses the groundwater operable unit. Provide the same rationale as found in Section 7.0 of the Proposed Plan.
29. Section IX. Summary of the Comparative Analysis of Alternatives: Revise section and eliminate discussions referring to any of Alternatives 9-C through 9-E since they do not apply.
30. Page 30, ¶ 1: Add the following text to the end of this paragraph.

"The time required to achieve groundwater response objectives as part of this alternative is approximately three years."

31. Page 33, ¶ 5: OSHA is not an ARAR.
32. Page 40, Section C.: Revise costs associated with the remedy. In addition, eliminate discussions referring to any of Alternatives 9-C through 9-E since they do not apply.
33. Page 42, Documentation of Significant Changes: Add the following text to this section.

"No significant changes have been made to the alternative described in the Proposed Plan and presented to the public."
34. Appendix D, Table D-1: Revise "Consideration in the Remedial Process" to "Action To Be Taken to Attain ARAR."
35. Appendix E: The Administrative Record should address this action only. If it is included with a larger record, the index should clearly identify those items that pertain to this ROD.