



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

September 1, 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 Final Interim Record of Decision
for the Groundwater Operable Unit at Site 9
NAS Brunswick
August 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.

The EPA appreciates the Navy's and the entire Technical Review Committee's efforts in reaching this ROD milestone and is looking forward to continuing our working relationship at Brunswick.

I will be getting in touch with you and Jim Caruthers to coordinate the process of getting this Interim ROD signed. Should you have any questions, please feel free to call me at (617) 223-5521.

Sincerely,

Robert Lim

Robert Lim, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc. Nancy Beardsley/MEDEP
Jim Caruthers/NASB
~~Elizabeth Walter/ABB-ES, Inc.~~
Susan Weddle/BACSE
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 Final Interim Record of Decision for the Groundwater Operable Unit at Site 9; Naval Air Station, Brunswick; Brunswick, Maine dated August 1994.

1. Page 17, ¶ 3, Line 9: Suggest adding "South of Neptune Drive" following the word "contamination."
2. Page 29, ¶ 1: Delete last sentence and replace with a brief discussion on estimated remediation time for and cost of a pump and treat system. The EPA feels that a comparison should be made between natural attenuation, and a pump and treat system since presenting the remediation time and cost of a pump and treat system will provide additional justification for choosing natural attenuation.
3. Page 34-35: With respect to "Reduction of Toxicity, Mobility, or Volume through Treatment, Implementability, and Cost" criteria, briefly discuss a pump and treat system.
4. Page 39, ¶ 2, Last Sentence: Instead of "its consideration in the remedial process," replace phrase with the following: "the action to be taken to attain the ARAR."
5. Page 39, Chemical-specific ARARs: Delete the 3rd and 4th bullets since they are not an ARAR.
6. Appendix D, Table D-1: Revise "Action To Be Taken To Achieve ARARs" to "Action To Be Taken To Attain ARARs."