



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

N60087.AR.000844
NAS BRUNSWICK
5090.3a

August 27, 1999

Mr. Emil Klawitter (eeklawitter@efdnorth.navy.mil)
Northern Division, Naval Facilities Engineering Command
Code 1823/EK
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Draft Record of Decision (ROD) for site 9, Naval Air Station, Brunswick, Maine

Dear Mr. Klawitter:

Thank you for the opportunity to review the site 9 draft ROD. I'd like to commend the Navy and EA Engineer, Science and Technology on drafting a good document, especially given the draft guidance provided.

My technical comments are attached. Comments from the EPA case attorney will be forwarded next week. This letter forwards my informal comments from last week; they haven't changed substantially. There are several new comments; most they are minor or editorial (in some cases to correct poor wording taken directly from the Region 1 model ROD). The new comments since last week are in italics in the attachment.

I thought Part 1, The Declaration, was well written. My comments were minor (some redundant text from the model ROD was deleted) and are displayed in the attached red line strike out version of the declaration.

I look forward to discussing our comments at the meeting next week. This will probably be the fastest way to resolve all the comments and concur on text for the draft final site 9 ROD.

If you have any questions, please contact me at 617-918-1344 or barry.michael@epa.gov.

Sincerely,

(Signed, 8/27/99 at 11:21 AM)

Michael S. Barry
Remedial Project Manager
Federal Superfund Facilities Section

cc. Carolyn LePage/LePage Environmental (clepagegeo@aol.com)
Betsy Mason/EPA Region 1 (mason.elizabeth@epa.gov)
Pete Nimmer/EA Environmental (pln@eaest.com)
Claudia Sait/ME DEP (claudia.b.sait@state.me.us)
Tony Williams/NASB (WilliamsA@nasb.navy.mil)

EPA Comments to the Site 9 Draft ROD

Note: Comments contained in email of 8/20/99 are in normal type, new ones are in italics. For minor text changes, I pasted in the text with red line strikeout from the draft ROD. All refer to Part 2 - The Decision Summary unless otherwise noted.

1. I tried to fix redundancy with section I.D site description and section V.A. site overview-see text. Basically I kept I.D. very general and got into more specifics on section V. A.

2. Verb tense on the second last bullet in public outreach: ~~a comment period is being was held~~

3. Section IV. A. 2. Ground-Water contamination. Suggest we refer to chlorinated VOCs rather than ethanes.. Also in section V. C. 1., Fate of Chemical Contaminants, ground water section, first bullet.

4. Section IV. B. 1. Inactive Ash landfill.

a. The first two bullets seem redundant but it seems like you are trying to show how the IC's will be implemented. Suggest changing second bullet to :

~~"Land these controls will be documented as land use restrictions documented in the current NAS Brunswick Operations Instructions."~~

This is in several other places in the ROD; sections IX, XI,

b. Third bullet: Leasing should be added as another action to notify EPA/ME DEP. Suggest the following wording change:

~~"Should NAS Brunswick close and/or transfer or lease the property, EPA and ME DEP will be notified and"~~

This is also in several other places in the ROD; section IV. B. 2. third bullet, section IX in various sub sections on the alternatives, section X,

c. Fourth bullet: if we specify metals testing downgradient of the landfill, we should also specify PAH's:

~~"the environment including by monitoring groundwater downgradient of the inactive landfill for metals and PAH's to assess..."~~

5. I had to add principle and low level threat waste text to sections IV.A.3 and sections V. E. This is required per current EPA policy though the basic information is redundant. Please comment if anything is incorrect. By the text throughout the ROD it seems the Navy and EPA agree there are no principle threat wastes at site 9.

6. Section V. A.; the bullet on historical data at site 9 should go after all the general NAS bullets on adjacent property use; this is better to see in the meeting.

7. Section V. D.; conceptual site model. I moved some of the background material to site description or site overview to reduce redundancies. Also recommend bolding the figure number references so they stand out.
8. I added a section V.F., site specific section, we have a lot of that for site 9. This section is in the new guidance, but isn't as "hard" a policy basis as the principle threat waste section, but I think it adds to the ROD. Again, please comment if anything is incorrect.
9. The risk section reads a lot better than the working draft, but could be easier to read. Unless anyone has a hard spot with it or specific recommendations, I suggest we leave it as is.
10. Risks and alternatives. I altered the text that talks about the stream sediments. This was a major risk driver on the IROD, but at this point we are really deferring it to the NPDES. I think this is appropriate, but we should be consistent throughout the ROD. This is a major departure from the interim ROD.
 - a. Regarding the above, I added a one line paragraph to the end of the stream sediment part of section A, Human Health Risk Assessment:

... The contents of the inactive landfill were not included in the Human Health Risk Assessment.

Since the interim ROD in 1994, risks due to stream sediments have been primarily attributed to non-site 9 sources.

11. Section VIII. A., Remedial Objectives; disregard edits from 8/20 comments.
12. Section IX., Development and screening of the alternatives. The time duration of alternatives 2 and 3 should be referred to as "approximately 20 years" in the table and various text. The ground water may reach MCL/MEG's prior to or after 20 years as there are many variables and a highly detailed and modeled duration was not undertaken.
13. Section X, comparative analysis of the alternatives table. Criteria 4 should be "poor" for alternative 1 and "moderate" for alternative 2.
14. Section X. K. and L.. The final ROD should have a ME DEP acceptance statement agreeable to ME DEP and a community acceptance statement that the Navy/EPA/ME DEP concur upon. Recommend we discuss this at the meeting on 9/1. Details can be referred to the responsiveness summary.
15. Section XI, The Selected Remedy. I deleted the alternative component bullets in my revision of 8/20. On further reflection, though this is redundant it is a good recap of the remedy components and maybe should be included.
16. Section XI. A, Interim Ground Water Clean up levels. This section should be ground water cleanup levels (confusion from the model ROD?). It's relevant to cover the interim ROD. We suggest:

Interim ground-water cleanup goals were defined in the ABB Interim Record of

Decision (1994) for three COC in ground water (dichloroethene, dichloroethane, and vinyl chloride). Target cleanup concentrations were 70, 5, and 2 ~~µg/L~~, respectively, and were equivalent to the Federal Maximum Contaminant Levels and State Maximum Exposure Guidelines at that time. ~~The cleanup levels for this Final ROD will be the same as the Interim ROD.~~

~~B. Since then, the State Maximum Exposure Guideline for vinyl chloride has been lowered to 0.15 µg/L.~~

A table of cleanup concentrations and basis should also be included.

17. Section XI. C. should also include a number 4, on 5 year reviews as a component of the remedy; suggest the following text:

4. Five Year Reviews

~~The program would be subject to review by the Navy, Regulatory agencies, and other interested parties every 5 years. Data collected during the Long Term Monitoring Program will be reviewed and recommendations for modifications will be made as part of annual reports or 5 year reviews.~~

18. Section XI. D. A new section on outcomes is required by the new guidance; following text is suggested:

D. Outcomes

~~After completion of the remedial action ground water at site 9 will no longer present a hazard to human health or the environment if it is used as a drinking water source.~~

~~During operation of the remedy human health and the environment will be protected from hazards due to contact with contaminants in the ash landfill. If excavations are required proper hazardous material handling will be ensured by following Navy procedures and the Base Operating Instructions under oversight of the EPA and MLEDEP. Stream sediments will be indirectly protected by monitoring any inflow of contaminants from site 9 sources. Periodic dredging will also be executed under the bases NIPDES program.~~

19. Section XII., Statutory Determinations. This section was taken directly from the Region draft model ROD, but some of the text was awkward or not put together well. The following changes are suggested:

- a. Sub section A., delete the last paragraph that starts with At the time..... This is for an interim ROD.
- b. Sub section D, the first few sentences are awkward, suggest changing to:

~~Once the Navy first identified those alternatives that attain or are appropriate, were appropriate and that are protective of human health and the environment by~~

~~either meeting or swaying ARAARs, as appropriate. The Navy then identified~~
which alternatives utilized permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable.

20. *Responsiveness Summary.*

- a. *EPA concurs to the transcript of the public meeting questions and responses.*
- b. *We recommend a letter be sent to the two individuals that asked questions for which answers were not available at the time. Suggest we discuss this at the meeting on 9/1. I'd also be willing to help with the letter if we choose to address some of the CERCLA process concerns/questions (or sign out a separate EPA letter) - to discuss.*

21. *Tables.*

- a. *EPA concurs to the contents of all the tables.*
- b. *Suggest including the tables within the body of the ROD to improve reability. To prevent messing up the pagination you could insert a blank page in the body where the table will go.*
- c. *I also added grid lines to a few of the tables, this seemed to make them easier to read, at least to me; the different options didn't "bleed" together as much.*

22. *IC's should be added to the glossary*