



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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September 14, 1999

Mr. Emil Klawitter
Code 1823 EK
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

Re: Draft Final Site 9 Record of Decision
Naval Air Station, Brunswick

Dear Mr. Klawitter:

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the report entitled Record of Decision for Site 9 (Draft Final), dated September 1999, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

General Comments:

1. Overall the Record of Decision (ROD) is much improved. The institutional controls are much better than before and remove any ambiguity.
2. Minor editing comments were faxed to EA for correction.

Specific Comments:

3. Page 2-9, Section 1, Ground-Water Contamination, 4th line:

“Ground water sampling data indicated that VOC concentrations are generally steady or have decreased over time, although vinyl chloride concentrations at up to four monitoring locations have exceeded the State MEG of 0.15 parts per billion and the Federal MCL of 2.0 parts per billion.”

It is unclear what is meant by “at up to four monitoring locations”. MEDEP recommends: Ground water sampling data indicated that VOC concentrations are generally steady or have decreased over time, although vinyl chloride concentrations *at 3 to 4 monitoring locations have exceeded the Federal MCL of 2.0 parts per billion and/or the State MEG of 0.15 parts per billion.*

4. Page 2-9, Section 3, Summary, 2nd sentence:

“Because the threat to human health is not immediate, there are no active sources of contamination, and there is no evidence of offsite contamination migration, removal ...”

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To be consistent, this should read "Because the threat to human health is not immediate, there are no active sources of contamination, and there is no evidence of offsite contamination migration *above the Federal MCL or State MEG*, removal ..."

5. Page 2-11, Inactive Ash Landfill, 1st sentence:

Please add the approximate date that the landfill was closed.

6. Page 2-12, Inactive Ash Landfill, bullet 2:

If the buildings or foundations are disturbed in the future in a way that would compromise the remedy, the remedy for the landfill will be reassessed."

While it is not a concern if the interior of the buildings is renovated, unless it involves the foundation, if the majority of the exterior walls are modified or removed then the regulatory agencies should have the opportunity to reassess the remedy. MEDEP recommends "If the *exterior walls of the buildings or foundations* are disturbed in the future, the remedy for the landfill will be reassessed.

7. Page 2-13, Ground Water Contamination, bullet 2:

"These contaminants are not mobile (i.e., they are contained onsite).

The use of the term mobile is confusing. For consistency this should be "migrating off site" and use the same phrase as else where in the document regarding off site migration.

8. Page 2-15, Ground Water, bullet 3:

"Monitoring data report VOC concentrations are generally steady or have decreased over time, although vinyl chloride concentrations at up to four monitoring locations have exceeded the State MEG of 0.15 parts per billion and the Federal MCL of 2.0 parts per billion."

The use of "at up to four monitoring locations" is awkward. See comment # 3 above.

9. Page 2-28, Inactive Ash Landfill:

A bullet needs to be added regarding reassessing the remedy if the building's exterior walls or foundations are disturbed.

10. Page 2-28, Inactive Ash Landfill, bullet 3:

"The Navy would continue the Long-Term Monitoring Program to ensure that ash remaining in the landfill is not impacting the environment, including monitoring water downgradient of the inactive landfill for metals ..."

The Navy also agreed to monitor for PAH's. Please correct

11. Page 2-28, Inactive Ash Landfill, last para:

This ARAR list must include the Solid Waste Management Rules, (06-096 CMR Chapter 400-402 405, and 411). This will need to be added to the ARAR table.

12. Page 2-34, Compliance with Applicable or Relevant and Appropriate Requirements, bullet 2:

The State's cancer risk factor must be added to this section.

13. Page 2-37, Ground Water Cleanup Levels:

The State MEG were issued in 1992 although they were not an ARAR. Therefore this section must be written. MEDEP recommends: Target cleanup concentrations were 70, 5, and 2 µg/L respectively and were equivalent to the Federal MCL and State MEG at that time. The cleanup levels for this final ROD will be the 70, 5 and 0.15 µg/L respectively since the State MEG are now ARAR and the MEG for vinyl chloride is 0.15 µg/L.

14. Page 2-38, Institutional Controls, paragraph between the second and third bullet:

In addition to this statement it must be more specific about if the buildings are removed, modified , or excavated then the remedy must be reassessed. MEDEP recommends making this paragraph a bullet.

15. Page 2-40, The Selected Remedy is Protective of Human Health, Public Welfare, and the Environment, para 2:

The State's cancer risk guideline must be included here.

16. Page 2-42, The Selected Remedy Does Not Satisfy the Preference for Treatment Which Permanently

This section does not address the issue of the ash landfill remaining in place. Please provide more information.

17. Figure 2-6:

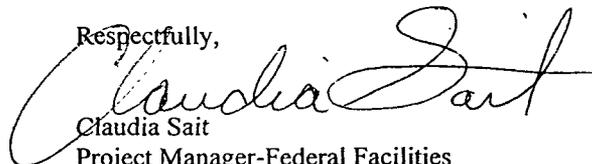
The approximate location of the Septic System needs to be shown in yellow to draw attention to it.

18. Appendix C:

The ARAR table must be separated in to types, such as Action, Location, and Chemical. Also the new ARAR must be added to this table.

Thank you for the opportunity to review this report. If you have any questions or comments please call me at (207) 287-7713.

Respectfully,



Claudia Sait
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Bureau of Remediation & Waste Management

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