

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
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BOSTON, MASSACHUSETTS 02114-2023

February 5, 2001

Lonnie Monaco (monacolj@exchange.efdnorth.northdiv.navy.mil)
Northern Division, Naval Facilities Engineering Command
Code 1821/LM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Consensus Statement for Sites 14, 15, 16 and 18, Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

Thank you for the opportunity to review the above document. The EPA concurs that the substantive work required to close these sites out with no further action under CERCLA have been completed. We have several editorial comments attached that we believe will strengthen the Consensus Statement by making the basis of our decision more clear in both technical and regulatory aspects.

A copy of the revised draft Consensus Statement should be sent to Tom Fusco and Ed Benedik for their comment since this is a decision document and they are RAB members.

The EPA had concurred to a prior draft of the closure letter report for debris removal activities at sites 15 and 16; and has no comment to the final report. If you have any questions, please contact me at 617-918-1344 or barry.michael@epa.gov.

Sincerely,

Michael S. Barry
Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc. Ed Benedik/Brunswick Conservation Commission (rbenedik@gwi.net)
Tom Fusco/BACSE
Al Easterday/EA (aeasterd@eaest.com)
Carolyn LePage/LePage Environmental (clepagegeo@aol.com)
Claudia Sait/ME DEP (claudia.b.sait@state.me.us)
Tony Williams/NASB (WilliamsA@nasb.navy.mil)

Attachment
USEPA Comments to Revised Draft Consensus Statement
Sites 14, 15, 16 and 18, Naval Air Station, Brunswick, Maine

1. **Statement Page 1:** regarding revisiting these sites in the future in the fourth paragraph of the statement. This should state that the regulatory agencies can revisit the no further action decision in light of new information, etc. (Any further site reassessment would then be done by the project team with the Navy as lead agency, but that is a detail not required in the consensus statement.)

1. **Risk Assessment Sections, Sites 15, 16, 18.** A sentence or phrase appears to be missing from this section as it's meaning isn't clear to EPA? Is the intent to say basically that no contaminants were found above risk screening levels in the Site Investigation phase?

1. **Site 14, Site Investigation (SI) Activities and Feasibility Study (FS) sections.** Add text to indicate that the Remedial Investigation (RI) was a site wide project, but was functionally a site inspection for Site 14 and that no typical RI-type activities were ever conducted, nor warranted at Site 14.

1. **Sites 15, 16 and 18, FS sections.** Add the reason why a FS was not performed. (Site didn't advance to the RI phase?)

Consensus Statement

Site 14

Issue: While photos can be reviewed, we need to understand where this is leading.

Magnetometer Survey

Navy (Emil) disagrees. SI August 1993 identified anomalies and then followed up the anomalies with test pits. The test pits were logged with the logs describing the reason for the anomalies. Since reason for anomalies were found with test pits, do not agree with performing another survey.

1. Issue: MEDEP and Lepage comment No. 1 state that further investigation to the north of the site may be necessary to learn the cause of elevated metals at LT-202 and LT-203.

Elevated metals at seep samples collected in 1989 are aluminum, arsenic, calcium, chromium, cobalt, copper, iron, lead, magnesium, mercury, vanadium, and zinc.

2. Issue: MEDEP comment No. 2 suggested method 5035 with preservation for sediment sampling.

In discussions with the analytical laboratory, methanol preservation has a detection limit of approximately 200 ppb, which is much higher than the current method that achieves approximately 5 ppb detection limit.

In order to achieve a low detection limit (approximately 5 ppb), sodium bisulfate instead of methanol would be necessary. EPA method 5035 using an Encore sampler is a newer method that can reach detection limits ranging from 5-200 ppb. There is a potential to lose VOC by sampling with this method, however, not as many VOC are lost in sampling with Method 5035 as in sampling with Method 8260.

3. Issue: The MEDEP would like the concept of "tiered approach" described for the reader. Comment #5.
4. Issue - MEDEP comment No. 18 and Lepage comment No. 14 say SW-7 is not far enough downstream. It should be moved 300 ft.

Based on the interpreted water table elevation figure generated with the 4 March 1999 well gauging data, it appears that ground water is flowing directly towards monitoring well MW-213 from the Site 2 landfill.

5. Issue - Lepage comment No. 11 asks how and where have site background levels been determined.

Previous discussions noted that background wells sampled in 1997 were not acceptable to ME DEP, and further discussions of this topic have not been completed.

6. Issue - Lepage comment no. 13 suggests that Section 1.4 Reports and Data Presentation belongs in Section 3. It should include discussion of the 5-year review and resulting report. In addition to the 5-year review, the ROD stated that data will be evaluated more frequently. That process must be clearly identified.
7. Issue - Lepage comment No. 17 stated approval/concurrence is confusing. The plan should clearly state when approval is required and concurrence is sufficient and which entities are involved.
8. Issue - Lepage comments no. 20 states that water and seep sediments must be analyzed for pesticides.

Subsequent to this comment, sediment sampling was completed along Mere Brook during ME 15 for Sites 1 and 3. The duplicate collected at Sed-19 reported DDD at 6.4 µg/L. No other pesticides were detected in the vicinity of Site 2. Seeps LT-202 and LT-203 and sediments SD-202 and SD-203 were sampled and analyzed for pesticides in 1989 and results were non-detect (see attached table).

Based on ME15 sediment results and 1989 sampling, pesticides do not appear to be impacting Mere Brook. Therefore, pesticides do not need to be added to LTMP seep sample analysis.

9. Issue - Lepage comment No 23 asks if we review QAPPs annually based on new EPA protocol.

At the RAB meeting in November, Mike Barry indicated that EPA reviewed the original QAPP and all the changes they requested were addressed in the Draft Final. There was a note that the Navy needs to discuss with the MEDEP/EPA on how it should be included in LTMP revisions.