



U.S. ENVIRONMENTAL PROTECTION AGENCY - REGION II
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

SEP 26 1996

Mr. Kenneth Smith, BEC
Public Works Office
Environmental Division
Naval Air Warfare Center
Trenton, New Jersey 08733-5000

Dear Mr. Smith:

As requested, the Environmental Protection Agency (EPA) has reviewed the draft Finding of Suitability to Lease (FOSL) for Building #2 and Parking Areas, as well as the September 17, 1996 Addendum #1 to the 1994 Environmental Baseline Survey for Lease (EBSL). The FOSL is related to the proposed leasing of a hangar bay, parking spaces, and office space totaling 26,645 of floor space in Building #2 of Naval Air Warfare Center Trenton.

We have reviewed these documents in conjunction with the information presented in the previously issued (June 20, 1994) FOSL for this building and in the Community Environmental Response Facilitation Action Report (July, 1994) for the facility. Please note that our review is solely for the purpose of determining whether they meet the requirements of the Department of Defense's (DoD) policy guidelines for issuance of FOSLs, and not for any other purpose. Based on our review of the documents submitted to us, and without any independent investigation or verification of the information presented in them, the proposed FOSL appears to be in accordance with the DoD's guidelines for issuance of FOSLs.

However, in our June 13, 1994 comment letter on the initial FOSL, we recommended that steps be taken to determine whether the flaking paint on the north and west interior walls is lead-based and, if so, that steps be taken to minimize the exposure risk. However, according to the Addendum, the south wall has been repainted several times due to a minor roof leak that is to be repaired and does not contain lead-based paint. Please clarify whether we are discussing the same area, as seems quite possible.

In a related issue, the EBS Addendum indicates that demolition of Building #1 (which is connected to Building #2, and presently provides it with utility services) is scheduled to occur during 1997. Further, it indicates that an asbestos inventory for the overall facility was conducted in 1993, and that asbestos removal

activity for pipe insulation in the attic of Building #2 is expected to be completed by the end of 1996. However, it does not indicate what asbestos abatement activities have been identified as necessary in conjunction with demolition of Building #1. Therefore, we recommend that the EBS Addendum incorporate specific information concerning types and amounts of asbestos in these two buildings, recognizing the requirements for controlling asbestos emissions during demolition and renovation that are specified in 40 CFR 61.145(c). Specifically, we recommend that it reflect the pre-demolition asbestos removal requirements, with particular attention to the requirement for removing Category II non-friable asbestos-containing materials that are likely to crumble, pulverize or be reduced to powder if demolished in place, such as transite boards/panels and asbestos-cement siding. Additional guidance about asbestos related requirements associated with demolition and renovation, including the required notification procedures, can be obtained through the following contacts:

Asbestos Notifications	State of New Jersey
Air Compliance Branch	Department of Health
U.S. EPA Region 2	CN 360
290 Broadway - 21st floor	Trenton, New Jersey 08625-0360
New York, New York 10007-1866	ATTN: Ronald Polakowski
(212) 637-4074	

Thank you for the opportunity to comment. If we can be of further assistance, feel free to contact me at (212) 637-3728.

Sincerely yours,

William P. Lawler, P.E.
BRAC Cleanup Team Member
Strategic Planning and Multi-Media
Programs Branch

cc: Donna Gaffigan, NJDEP

bcc: B. Wing
P. Pocze
R. Fitzpatrick

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