

**FINDING OF SUITABILITY TO TRANSFER
FOST 2012-1
PARCELS EDC-8, EDC-9, EDC-10, EDC-11 and EDC-14
(Approximately 211 Acres)**

**FORMER NAVAL AIR STATION BRUNSWICK
BRUNSWICK, MAINE**



Prepared by:

**Department of the Navy
Base Realignment and Closure
Program Management Office Northeast
4911 S. Broad Street
Philadelphia, Pennsylvania 19112**

May 2012

TABLE OF CONTENTS

SECTION	PAGE
TABLE OF CONTENTS	i
1.0 PURPOSE.....	1
2.0 PROPERTY DESCRIPTION.....	1
2.1 Description MRRA EDC Parcels	1
2.2 Proposed Reuse MRRA EDC Parcels	3
3.0 SUMMARY OF ENVIRONMENTAL REQUIREMENTS AND NOTIFICATIONS - MRRA EDC Parcels	4
3.1 Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).....	5
3.2 Resource Conservation and Recovery Act (RCRA)	8
3.3 Presence of Petroleum Products and Derivatives	9
3.4 Underground Storage Tanks (USTs), Aboveground Storage Tanks (ASTs) and Oil-Water Separators (OWSs).....	10
3.5 Munitions and Explosives of Concern (MEC)	10
3.6 Asbestos-Containing Material (ACM).....	11
3.7 Lead-Based Paint (LBP)	12
3.8 Polychlorinated Biphenyls (PCBs)	12
3.9 Environmental Restrictions, Provisions and Conditions	13
3.10 Environmental Compliance Agreements/Permits/Orders	13
3.11 Availability of References.....	13
3.12 Notification to Regulatory Agencies and Public	14
4.0 FINDING OF SUITABILITY TO TRANSFER	15
 EXHIBITS	
A	References
B	Figures and Tables
Figure B-1	Location Map
Figure B-2	Aerial View
Figure B-3	Features Map
Figure B-4	Features Map (North) EDC-8 Parcel
Figure B-5	Features Map (East) EDC-9, EDC-10, and EDC-11 Parcels
Figure B-6	Features Map (South) EDC-14 Parcel
Table B-1	Current and Former Buildings and Land Areas
Table B-2	Summary of Environmental Sites on or Near Transfer Parcels
Table B-3	Environmental Issues by Building and Land Area
Table B-4	Summary of Documented Spills
Table B-5	Underground Storage Tanks
Table B-6	Aboveground Storage Tanks
Table B-7	Oil Water Separators
Table B-8	Summary of Asbestos Containing Material
Table B-9	Summary of Current and Removed Equipment Containing Dielectric Fluid
Table B-10	Monitoring Well Locations on Transfer Parcels

C	CERCLA Hazardous Substance Notice
D	Notice of Petroleum Products and Derivatives
E	Asbestos-Containing Materials Hazard Disclosure and Acknowledgment Form
F	Lead-Based Paint Hazard Disclosure and Acknowledgment Form
G	Environmental Restrictions, Provisions and Conditions
H	Comments and Responses

1.0 PURPOSE

This Finding of Suitability to Transfer (FOST) summarizes how the requirements and notifications for hazardous substances, petroleum products, and other regulated material on the property have been satisfied, and documents my determination, as the responsible Department of Defense (DoD) component official, that certain real property and associated improvements comprised of five parcels (Transfer Parcels) at the former Naval Air Station Brunswick (NASB) are environmentally suitable for deed transfer subject to the conditions, notifications, covenants and restrictions set forth in this document. The Transfer Parcels are to be conveyed to one GRANTEE and are located on the Main Base in Brunswick, Maine (Figures B-1, B-2, and B-3). Combined, they total approximately 210.97 acres of land that were used for Ready Mobile Construction Battalion 27 (Sea Bee) operations and training, retail and community services, anti-submarine warfare operations, lodging and recreation, including a 9-hole golf course (Figures B-4 through B-6).

The suitability for transfer decision is based primarily on review of information contained in reports, the former NASB Environmental Department records, and other communications listed in Exhibit A (References). Factors leading to this decision and other pertinent information related to property transfer requirements are stated below.

2.0 PROPERTY DESCRIPTION

2.1 Description MRRA EDC Parcels

The five Transfer Parcels are identified in the table below with parcel identification numbers (IDs), the reuse districts that apply based on the Master Reuse Plan (Matrix 2007), their approximate acreages, their conveyance mechanism (i.e., economic development conveyance [EDC]), and their intended recipient (GRANTEE). The GRANTEE for all five parcels is the Midcoast Regional Redevelopment Authority (MRRA).

Parcel ID	Reuse Plan District	Approx. Acres	Conveyance	GRANTEE
EDC-8	Professional Office/Natural Areas	50.54	EDC	MRRA
EDC-9	Community Mixed Use/Business and Technology	25.64	EDC	MRRA
EDC-10	Community Mixed Use	8.97	EDC	MRRA
EDC-11	Community Mixed Use	13.04	EDC	MRRA
EDC-14	Recreation and Open Space	112.78	EDC	MRRA
FOST 2012-1 Total Acres		210.97		

The acreages presented for the Transfer Parcels are approximate. The figures and descriptions included in this FOST provide a general depiction of the boundaries of and buildings and structures within the Transfer Parcels. The exact boundaries of the Transfer Parcels will be determined by a real estate survey, and maps and legal descriptions will be generated that meet the requirements of the Cumberland County Registry of Deeds.

The five MRRA EDC Parcels total approximately 210.97 acres of land (Figure B-3). Existing and former buildings, structures, and open space areas within each of these parcels are described in Table B-1.

Parcel EDC-8 (Figure B-4) is approximately 50.54 acres of open land east, west, and south of the Sea Bee Compound which borders Bath Road (Route 24) on the northern boundary of the former NASB (Figure B-4). The west side of the parcel is an open, grassy area in the clear zone for the runways/taxiways. Most of the Ready Mobile Construction Battalion 27 area (the Sea Bee Compound) is not included in this transfer parcel, with the exception of Buildings 402 (CPO Mess), 403 (Training Classroom), 628 (Administration Building), 632 (NMCB-27 Training Building), and 637 (Administration Building). The eastern side of the parcel includes wooded and grassy areas, and Androscoggin Ponds 1 and 2 on a small tributary of the Androscoggin River. The ponds collect stormwater runoff that eventually flows north off the base and under Route 24. Site 8 (Perimeter Road Disposal Site) is a Navy Installation Restoration (IR) Program site located adjacent to the northeast corner of the parcel but is not within the parcel. The site was previously remediated and requires no further action under CERCLA (Table B-2).

Parcel EDC-9 (Figure B-5) is approximately 25.64 acres of land located south and east of the airfield apron areas. Commercial and community support services buildings are located in this parcel, including Buildings 11 (Navy Exchange Retail Complex), 23 (Car Wash), 31 (Navy Lodge), 583 (Bowling Center/Recreation Mall), and 585 (Chapel). Building 20 (Community Facilities/Navy College Office) is excluded from this FOST.

Parcel EDC-10 is the former Anti-Submarine Warfare Operations Center and includes Buildings 87 and 594. The parcel is approximately 8.97 acres in area and was previously a U.S. Air Force (USAF) Control and Warning Facility (radar station) compound constructed in approximately 1946. The USAF operated the station until approximately 1965 when it was transferred to the Navy. Building 594 is a former USAF radome constructed in 1950 and was first used by the Navy for storage starting in 1966. The first floor of Building 594 was later converted to a boiler room for Building 87, and the second floor was still used for storage. Building 87 contained communications offices, classrooms and training areas, telecommunications rooms, message processing centers, and electrical repair rooms.

Parcel EDC-11 (Figure B-5) is approximately 13.04 acres in area. The only building on the parcel is the former Transient Visitors Quarters (Building 750), a 250-room military hotel that housed enlisted visitors to the base. The southeast corner of the parcel was formerly used by the USAF as part of its radar station.

Parcel EDC-14 (Figure B-6) is a 112.78-acre, 9-hole public golf course and driving range with associated support buildings. Potable water is provided by a public, domestic water-supply well (PWSID 94492101) near the southeastern exterior of the Clubhouse (Building 78). IR Program Site 16 (Swampy Road Debris Site) is located in the northwest part of the parcel. The site was previously addressed and required no further action under CERCLA (Table B-2).

2.2 Proposed Reuse MRRA EDC Parcels

The Reuse Master Plan (Matrix, 2007) establishes the overall framework for future reuse and redevelopment of the former NASB, and will be implemented by MRRA. The proposed reuses per the master plan are as follow:

MRRA has requested approval from the Navy to acquire Parcels EDC-8, EDC-9, EDC-10, EDC-11 and EDC-14 for economic development purposes. Parcel EDC-8 is located in the Professional Office District in the Reuse Master Plan. This district is intended to provide an employment center for corporate and professional offices such as law, medical, insurance, architectural, engineering, finance, real estate, or other similar users. Such uses could be accommodated within this zone in stand-alone buildings, in a campus setting, or in a more compact office complex. The proposed reuses are compatible with the previous uses of Parcel EDC-8 for the Sea Bee Compound and as undeveloped open space.

Parcels EDC-9, EDC-10 and EDC-11 are located entirely within the Community Mixed Use (CMU) District in the Reuse Master Plan. The CMU District is intended to provide a centralized area that encourages a compact pedestrian-oriented mix of community-related uses that will provide a variety of live, work, play and educate opportunities. Typical uses within the CMU could include neighborhood-scale retail, professional offices, business and support services, restaurants, hotels and conference centers, health and fitness centers, day care centers, civic and cultural uses, parks, government buildings, and higher-density attached housing (e.g., town homes, condominiums and apartments). These potential uses are generally consistent with the current and former land uses (retail and commercial businesses, hotel-like lodging facilities, chapel, and communications) on these parcels with the exception that residential, child, or eldercare facilities would not be consistent with previous uses (radar station) of Parcel EDC-10.

Parcel EDC-14 is located in the Recreation and Open Space District intended to provide suitable areas for a variety of commercial and public outdoor active and passive recreational opportunities for the

community. Recreational uses could include public parks, sports fields, golf courses, public gardens, bicycle trails, and equestrian facilities. These uses are compatible with the former use of Parcel EDC-14 as a golf course.

3.0 SUMMARY OF ENVIRONMENTAL REQUIREMENTS AND NOTIFICATIONS - MRRA EDC PARCELS

Available information concerning the past storage, release, or disposal of hazardous substances and/or petroleum products on the five Transfer Parcels was compiled from record searches conducted or data generated for the Initial Assessment Study (NEESA, 1983); the Environmental Condition of Property (ECP) report (DoN, 2006); the CERFA Report (NAVFAC, 2007); the Third Five Year Review for Naval Air Station Brunswick (Tetra Tech 2010a); the Resource Conservation and Recovery Act (RCRA) partial closure reports (Tetra Tech, 2010b-h and 2011c-m, 2011p,q); and various studies conducted under the IR Program, the Navy Munitions Response Program (MRP), the Navy Petroleum Program, and specifically to support the FOST. Sources included NASB Environmental Department records and databases (for storage tanks, transformers, spills); NASB Public Works Records and Drawings ranging from 1943 to 2006; MEDEP Spills and Tanks Databases (accessed 2011); and historical aerial photographs (James W. Sewell, 1953-1997; USEPA 1987 EPIC analysis). Personnel interviews with current and former environmental department personnel and on-site visual inspections were also conducted. References are cited in Exhibit A.

Detailed environmental recordkeeping, policies, and procedures evolved in the early 1980s as a result of passage of RCRA (1976) and CERCLA (1980). The 1983 IAS provided the first detailed documentation of Navy management practices for the use and storage of hazardous substances and storage and disposal of hazardous wastes at the former NASB. Environmental records for the periods prior to this time were less centralized and may not have been retained. Thus, the majority of the information used to evaluate the environmental management practices and the environmental condition of the property at the former NASB is based on information obtained from the past 30 years.

The following sections summarize the findings as they relate to each parcel, the actions and notification requirements associated with the past storage, release, or disposal of hazardous substances and/or petroleum products or other regulated materials, and the transfer restrictions warranted to ensure protection of human health and the environment and the environmental restoration process. Also, potential environmental impacts from adjacent property conditions related to hazardous substances, petroleum products, or other regulated materials are discussed. Table B-3 provides a brief checklist of the environmental conditions that apply to the existing buildings and land areas within each of the Transfer Parcels.

3.1 Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

CERCLA Hazardous Substance Notice

In accordance with Title 42, U.S.C. §9620(h)(3)(A)(i), all deeds transferring federal property must provide notice as to those hazardous substances which it is known, based on a complete search of agency files, were stored for one year or more, released or disposed on the property in excess of those threshold quantities specified under 40 CFR 373, and all response actions taken to date to address any such releases or disposals.

No hazardous substances are known to have been stored or released in excess of their respective threshold quantities on Parcels EDC-8, EDC-9 or EDC-11 based on records reviewed for this FOST. In Parcel EDC-14, granular pesticides, herbicides, and fungicides were stored in lockers (Structures U4, V4 and W4) at Building 22 (Golf Maintenance Awning), and mixed for liquid application at Building 39. Golf Maintenance Records for 2002 through 2005, provided in the ECP Report, indicate that these chemicals were stored in quantities less than their threshold quantity of 1000 kg. Thus, no CERCLA hazardous substance notice is required for these parcels.

In Parcel EDC-10, there are no records indicating that hazardous substances were used or stored in excess of their threshold quantities. However, low levels of the volatile organic compounds (VOCs) trichloroethylene (TCE) and perchloroethylene (PCE) were detected in groundwater, indicating that a release may have occurred at some point in time, but quantities are unknown.

The hazardous substance notice for Parcel EDC-10 is provided in Exhibit C.

CERCLA Responses on the MRRA EDC Parcels

There are no IR Program sites, Areas of Potential Interest (AOPIs), or MRP sites on Parcels EDC-8, EDC-9, EDC-10 or EDC-11. IR Site 16 (Swampy Road Debris Site) is located in the northwest corner of Parcel EDC-14. Solid waste and a small area of soil with elevated lead concentrations were previously removed from the site, and no further action was required under CERCLA per a 2001 Consensus Statement signed by EPA, MEDEP, and Navy (US EPA, 2001). No environmental impacts have been identified from Site 16 that would affect the suitability for transfer of the EDC-14 Parcel, as described in Table B-2.

As noted in Section 2.1, the USAF operated a radar station on the base. The “radome” compound was located in EDC-10 near current Buildings 87 and 594, and at a former radio transmitter (former Building 35) used by the USAF as a communications/receiver facility located in the southern portion of

EDC-11. In February 2011, the Navy conducted groundwater screening investigations on Parcels EDC-10 and EDC-11 to address regulatory agency concerns about potential historical use of solvents by the USAF. Groundwater samples in the Building 87 area were analyzed for volatile petroleum hydrocarbons (VPH), VOCs, ethylene dibromide, and 1,4-dioxane. Trace levels of VOCs including TCE and PCE were detected in 3 of 11 wells at concentrations below EPA Maximum Contaminant Levels (MCLs) for drinking water and vapor intrusion standards for workers. The highest concentration detected was TCE at 2.6 µg/l (MCL = 5 µg/l). PCE exceeded the Maine Maximum Exposure Guideline (MEG) of 0.6 µg/l in one sample, TCE and/or PCE exceeded their November 2010 EPA Tap Water Regional Screening Levels (RSLs – 2.0 µg/l and 0.11 µg/l, respectively) in two samples, and chloroform exceeded its RSL (0.19 µg/l) in one sample (Tetra Tech, 2011a). No further action was recommended assuming future commercial reuse of Parcel EDC-10. Groundwater samples collected in the former Building 35 area were analyzed for VPH, extractable petroleum hydrocarbons (EPH), and VOCs. No analytes were reported above detection limits in any of the samples and, therefore, no impact on the suitability for transfer of Parcel EDC-11 was identified (Tetra Tech, 2011b).

CERCLA Responses Not on the MRRA EDC Parcels but Within 200 Feet

There are no IR Program or MRP sites or AOPIs within 200 feet of Parcels EDC-10 or EDC-11. There are IR and AOPI sites within 200 feet of the remaining MRRA EDC Parcels as follows:

- EDC-8 - Site 8 (Perimeter Road Disposal Area)
- EDC-9 - Site 17 (Former Pesticide Shop)
- EDC-9 – AOPI Buildings 7 & 10 (Aircraft Maintenance Shops)

While these IR and AOPI sites are not expected to impact the Transfer Parcels, land use controls (LUCs) may be required on some of the parcels to protect the integrity of remedies implemented at those nearby sites. Table B-2 provides descriptions of these sites, including site concerns, investigation and remedial action summaries, site-specific restrictions that apply to the IR sites themselves, and potential site impacts on the Transfer Parcels.

CERCLA Covenant

No hazardous substances and no petroleum products or their derivatives are known to have been released or disposed of in excess of their respective threshold quantities on Parcels EDC-9, EDC-11 and EDC-14. Therefore, in accordance with the requirements and limitations contained in Title 42, U.S.C., §9620(h)(4)(D)(i), the deed transferring these parcels will contain a covenant warranting that any response action or corrective action found to be necessary after the date of transfer for contamination

existing on the property prior to the date of transfer shall be conducted by the United States (GRANTOR) (Exhibit G-1).

No hazardous substances are known to have been released or disposed of in excess of their respective threshold quantities on Parcel EDC-8. Thus, the transfer deed will not require the Title 42, U.S.C., §9620(h)(3)(A)(ii) covenant. Petroleum products or their derivatives have been released on this parcel; therefore, the Title 42, U.S.C., §9620(h)(4)(D)(i) covenant is not applicable (Exhibit G-2).

Hazardous substances may have been released or disposed of in excess of their respective threshold quantities on Parcel EDC-10. Therefore, in accordance with the requirements and limitations contained in Title 42, U.S.C., §9620(h)(3)(A)(ii), the transfer deed will contain a warranty (Exhibit G-3) that:

- All remedial action necessary to protect human health and the environment with respect to any hazardous substances remaining on the property has been taken by the GRANTOR, and
- Any additional remedial action found to be necessary after delivery of this Quit Claim Deed shall be conducted by the GRANTOR.

CERCLA Access Clause

No hazardous substances and no petroleum products or their derivatives are known to have been released or disposed of in excess of their respective threshold quantities on Parcels EDC-9, EDC-11, and EDC-14. Therefore, in accordance with Title 42, U.S.C., §9620(h)(4)(D)(ii), the deed transferring these parcels will contain a clause granting the United States access to the property in any case in which a response action or corrective action is found to be necessary after the date of transfer at the property, or when such access is necessary to carry out a response action or corrective action on adjoining property (see Exhibit G-1).

No hazardous substances are known to have been released or disposed of in excess of their respective threshold quantities on Parcel EDC-8. Thus, the transfer deed will not require the Title 42, U.S.C., §9620(h)(3)(A)(iii) access clause. Petroleum products or their derivatives have been released on this parcel. Therefore, the Title 42, U.S.C., §9620(h)(4)(D)(ii) access clause is not applicable. However, the transfer deed for this parcel will include a Reservation of Access Clause (see Exhibit G-2).

Hazardous substances may have been released or disposed in excess of their respective threshold quantities on Parcel EDC-10. In accordance with the requirements and limitations contained in Title 42, U.S.C., §9620(h)(3)(A)(iii), the transfer deed will contain a clause granting to the United States, its

officers, agents, employees, contractors, and subcontractors the right to enter upon Parcel EDC-10 in any case that a response action or corrective action is found to be necessary after the date of transfer (see Exhibit G-3).

The transfer deed will also contain a clause granting to the State of Maine its officers, agents, employees, contractors, and subcontractors the right to enter upon the transfer parcels in the case that a response action or corrective action is found to be necessary after the date of transfer (see Exhibits G-1, G-2, and G-3).

3.2 Resource Conservation and Recovery Act (RCRA)

The former NASB is a large quantity generator (EPA ID Number ME8170022018) as defined by the 1984 Hazardous and Solid Waste Amendments to the Resource Conservation and Recovery Act of 1976. RCRA authority has been delegated by the USEPA to the State of Maine. The former NASB RCRA Facility at the Main Base is being closed to meet the hazardous waste closure requirements of Maine Hazardous Waste Rules, Chapter 851, Standards for Generators, Section 11, Closure, and other relevant rules pursuant to 38 M.R.S.A., Section 1301, et seq. The RCRA Facility is defined as the former NASB Main Base; therefore, the Navy has prepared RCRA Partial Closure Reports to close the individual buildings, structures, and land areas that comprise the Main Base.

RCRA closure reports have been prepared for the structures and land areas in the MRRA EDC Parcels. The closure activities performed at the individual locations are described in the associated RCRA Partial Closure Reports (Tetra Tech, 2010b-h and 2011c-m, 2011p, q) which document the records research; site visit observations; results of NASB Environmental Department personnel interviews; sampling results if applicable; and response actions, if any, with respect to hazardous waste generation, accumulation, or storage activity on the Transfer Parcels. The RCRA closure reports serve as a major source of information for this FOST, and relevant findings are incorporated into the appropriate sections.

Due to the age and/or the use of the buildings, wipe samples were collected from work benches, floors and walls of Building 87 (EDC-10) for analysis of semi-volatile organic compounds (SVOCs) and RCRA metals. The lead results for wipe samples were compared to the MEDEP criterion for lead-contaminated, settled dust on floors, 40 micrograms per square foot ($\mu\text{g}/\text{ft}^2$), applicable for RCRA closures. The other seven RCRA metals were compared to available World Trade Center (WTC) Settled Dust Screening Values (WTC, 2003). SVOCs were not detected and lead results were below the MEDEP criterion in all wipe samples. The other seven metals were below reference clearance values.

Paint chip samples collected at Building 309 in Parcel EDC-14 and Buildings 628 and 637 in Parcel EDC-8 were analyzed for Toxicity Characteristic Leaching Procedure (TCLP) metals. The TCLP limit for

lead was exceeded at Building 309, the barium TCLP limit was exceeded at Building 637, and the chromium TCLP limit was exceeded at Buildings 628 and 637. Based on these results, loose paint and paint chip removal was performed on the exteriors of Buildings 309, 628 and 637. Surface soil samples were also collected around these buildings. The analytical results were compared to the MEDEP Remedial Action Guidelines (RAGs) for contaminated soil and to the Upper Prediction Limits (UPLs) that were established for background concentrations of metals in soil at the former NASB. Lead at Building 309 exceeded its MEDEP RAG; therefore, surface soil was removed along the north and northwest exterior sides of the building in October and November 2011. Arsenic was the only metal detected at concentrations that exceeded its MEDEP RAG in samples collected at the other buildings, but all detected arsenic concentrations were within the range of arsenic concentrations the Navy considers to be consistent with background based on the Background Study conducted at the former NASB (Tetra Tech, 2012b).

Areas that historically may have had PCB-containing equipment were tested as part of the RCRA closure process. Soil samples collected near poles and pads where known or suspected PCB transformers were previously located at Building 637 in Parcel EDC-8 and Buildings 20, 583, and 585 in Parcel EDC-9 were analyzed for PCBs. No PCBs were detected, except at a concrete pad at Building 583 where one sample slightly exceeded the MEDEP action limit (1 mg/kg) for PCBs in soil at 1.2 mg/kg. The average PCB concentration of the three surface soil samples collected around the pad was 0.330 mg/kg, well below the MEDEP action limit. Based on the average surface soil sample PCB concentration and the deeper interval result (0.076 mg/kg), the MEDEP action limit was not exceeded.

The hazardous waste closures for the MRRA EDC Parcels were completed in accordance with provisions of the MEDEP Regulations Chapter 781, Standards for Generators of Hazardous Waste Section 11.

3.3 Presence of Petroleum Products and Derivatives

Petroleum products have been used and stored in underground storage tanks (USTs) and aboveground storage tanks (ASTs) on all of the MRRA EDC Parcels, as described in Section 3.4 below. In addition, segments of the Casco Bay Pipeline (a former abandoned-in-place aviation fuel pipeline) cross Parcels EDC-11 and EDC-14. No releases to the environment associated with the pipeline were known to have occurred on the NASB Main Base where the pipeline remains abandoned-in-place. During removal of seven miles of the pipeline off-base, between Mitchell Field in Harpswell, Maine, and the southern boundary of the NASB Main Base, only two locations were found where jet fuel had leaked to surrounding soil. At both locations the soil was excavated and disposed of off-site and post removal confirmation sampling indicated VPHs and EPHs were not detected or were well below MEDEP remediation guidelines. Notice of the presence of petroleum products and derivatives is provided in Exhibit D.

Petroleum Releases Originating on the MRRA EDC Parcels

There are no known or suspected petroleum releases that originated on the MRRA EDC Parcels that are currently being investigated or cleaned up. Past petroleum releases that occurred on the parcels but were previously addressed are described in Table B-4.

Petroleum Releases Originating on Adjoining Properties

A 63,500 gallon spill from the Jet Fuel Storage Installation located south of EDC-8 occurred in 1993. Jet fuel from an AST was released through the storm drain system across EDC-8 and migrated to an unnamed wetland/tributary of the Androscoggin River north of Route 24. The Navy coordinated with all appropriate entities for the spill response. The spill is further described in Table B-4.

As shown on Figure B-3, there is one Petroleum, Oils and Lubricants (POL) site within 200 feet of the MRRA EDC Parcels that is currently undergoing investigation and remediation: POL Site 2 (Navy Exchange Service Station) is near Parcel EDC-9. Groundwater flow direction at the site is away from Parcel EDC-9, and there is no evidence of impact to Parcel EDC-9 soil or groundwater, as further described in Table B-2.

3.4 Underground Storage Tanks (USTs), Aboveground Storage Tanks (ASTs) and Oil-Water Separators (OWSs)

Petroleum products have been used and stored in USTs and ASTs on the MRRA EDC Parcels as described below. There are currently no known USTs present. Of the seven former USTs, five stored fuel oil #1 or #2 (heating oil), one stored diesel fuel and the other was unknown (and possibly a septic tank). Of the 18 current and former ASTs, 9 stored fuel oil #1 (heating oil), two stored waste oil, two stored diesel fuel, two stored gasoline, two stored cooking grease and one stored propane. Seven of the 19 ASTs have been removed, while another seven ASTs have been cleaned and closed. No releases have been reported for any of the ASTs. There are three OWSs on the MRRA EDC Parcels – two at Building 23 (EDC-9), and one at Building 39 (EDC-14). No releases associated with these OWSs were identified during the records review.

Detailed information about the former USTs, current and former ASTs, and OWSs is provided in Tables B-5, B-6, and B-7, respectively.

3.5 Munitions and Explosives of Concern (MEC)

There are no MRP sites on or within 200 feet of the MRRA EDC Parcels.

On November 1, 2011, a contractor discovered what appeared to be a munitions item in the area near Building 309 (Golf Pump House). After assessment by UXO specialists, the munitions item was classified as Material Documented as Safe and identified as a World-War-II-era, 100-pound, sand-filled practice bomb without spotting charge, therefore not presenting an explosive hazard. NOSSA was informed of the discovery and initial response (Tetra Tech, 2011r) and concurred the item was Material Documented as Safe. Since the munitions item does not pose an explosives hazard, it is highly unlikely that there has been a release to soil or any residual soil contamination resulting from this item (Tetra Tech, 2011r).

3.6 Asbestos-Containing Material (ACM)

An asbestos survey was completed in 2005. The 2005 inventory findings for 19 of the buildings and structures on the MRRA EDC Parcels are presented in Table B-8, along with 2011 Asbestos Containing Building Materials Summaries prepared for most of the buildings by the NASB Asbestos Program Manager (Sanders, 2011). No friable, accessible, and damaged asbestos was identified in the buildings and structures. Prior to any future renovations or demolitions, previously untested materials considered suspect by USEPA, MEDEP, and Occupational Safety and Health Administration (OSHA) regulations should be sampled and analyzed.

Short segments of steam lines associated with the former heating system may be present. Typically, the steam lines going into the buildings consisted of two steel pipes in concrete trenches, one approximately 3 to 4 inches in diameter and a larger one 5 to 6 inches in diameter. Some pipes were insulated with ACM and some were not. Specific documentation for the Transfer Parcels is not available; therefore, for any work that could impact abandoned steam lines, it must be assumed that ACM materials may be present (Sanders, 2010).

The subsurface closed-in place Casco Bay Pipeline is covered in a tar exterior coating and a fire resistant asbestos wrapping (GZA, 1997). Segments of the pipeline are located in Parcels EDC-11 and EDC-14.

The possibility remains for the presence of undiscovered ACM associated with underground utilities or miscellaneous building materials. While this potential ACM does not pose a hazard to site users, future renovation or demolition and/or subsurface work performed could result in friable and damaged ACM hazards. Therefore, the GRANTEE must comply with all applicable State and Federal laws relating to ACM management in order to ensure future protection of human health and the environment during any future renovation/demolition activities or underground utility work. An Asbestos Hazard Disclosure and Acknowledgment Form is included as Exhibit E to this FOST and will be provided to the GRANTEE for execution at the time of transfer.

3.7 Lead-Based Paint (LBP)

Federal lead standards established by USEPA and the Department of Housing and Urban Development quantify LBP as 0.5% lead dry weight. LBP was banned for residential use in 1978. Lead-containing paint is any paint which contains lead as determined by a testing laboratory using a valid test method. OSHA regulations do not indicate a specific level of lead that is permissible during construction and/or demolition activities. Current manufacturing standards for paint allow up to 0.06% for residential use. Industrial paint applications can contain much higher concentrations. Other building materials may contain lead, as in roof flashing, caulking and vent sealant. The following issues are noted.

The NASB Asbestos Program Manager/Lead Coordinator prepared a Lead and Asbestos Containing Building Materials Summary) for many of the buildings and structures on the MRRA EDC Parcels in 2011 (Sanders, 2011). Four of the buildings were tested for LBP – Buildings 11, 87, 628 and 637. Paint samples from Buildings 628 and 637 exceeded 0.5% lead. The remaining buildings on the MRRA EDC Parcels that were not tested but were constructed before 1978 when LBP was banned for consumer use are suspected to contain LBP (see Table B-3). For example, Building 309 tested positive for LBP during the RCRA closure process resulting in loose paint and paint chip removal from the exterior of the building, as well as removal of lead-contaminated soil around the building (Section 3.2). Other building materials may contain lead, as in roof flashing, caulking and vent sealant (Sanders, 2010a). A Lead-Based Paint Hazard Disclosure and Acknowledgment Form, Exhibit F to this FOST, will be provided to the GRANTEE for execution at the time of transfer.

3.8 Polychlorinated Biphenyls (PCBs)

All PCB-containing equipment and PCB-contaminated transformers were removed from the former NASB by 1995. According to NASB Environmental Department personnel, the removal/replacement process began in the mid to late 1980s. A summary of information provided in the NASB transformer database is presented in Table B-9 for each of the MRRA EDC Parcels. Transformers that were removed from service or replaced prior to 1988 are not shown in the database. Based on available documentation and discussions with NASB Environmental Department personnel, there have not been any documented leaks or releases from transformers in past use on the MRRA EDC Parcels. Areas that historically may have had PCB-containing equipment were tested as part of the RCRA closure process (see Section 3.2.).

USEPA has advised that buildings constructed or renovated between 1950 and 1978 have the potential to have PCBs contained within the caulking, and that PCBs can migrate from the caulk into air, dust and surrounding material, such as wood, bricks and soil. Inasmuch as USEPA has yet to establish a link between PCBs in caulking and public health risk, USEPA presently does not require that caulking in these buildings be tested for the presence of PCBs. Notwithstanding, the GRANTEE is provided notice by

receipt of this FOST that Buildings 583 and 585 in Parcel EDC-9, 594 in Parcel EDC-10 and 309 in Parcel EDC-14 may have caulking containing PCBs based on their year of construction. The GRANTEE is put on notice by receipt of this FOST that all damaged caulking in the building and materials in contact with, or soil beneath, the damaged caulking, if encountered, should be handled, managed, and disposed of properly during maintenance and/or renovations by the GRANTEE.

Ballasts in fluorescent light fixtures manufactured prior to 1979 may contain sealed PCB-containing components. A survey of station buildings/structures/facilities for PCB-containing light ballasts has not been conducted; however, it is possible that surplus light fixtures could have been used up to 1982. Therefore, it is assumed buildings/structures/facilities constructed up until 1982 may have light fixtures with PCB components; however, many buildings that were constructed prior to 1982 have had interior renovations and new light fixtures that do not contain PCBs may have been installed.

3.9 Environmental Restrictions, Provisions and Conditions

Based on the current environmental condition of the MRRA EDC Parcels as described in this FOST, certain environmental restrictions, provisions, and conditions will be included in the transfer deed to ensure the protection of human health and the environment and to prevent the interruption of any environmental restoration activities to be conducted by the Navy, if required. Exhibits G-1 through G-3 contain the environmental restrictions, provisions and conditions for the MRRA EDC Parcels.

3.10 Environmental Compliance Agreements/Permits/Orders

The former NASB (Main Base) is an NPL site under CERCLA of 1980, as amended. Thus, the Transfer Parcels are subject to the NASB Federal Facility Agreement (FFA), October 1990, as amended, that was signed by the Navy, USEPA, and MEDEP (DoN, EPA, MEDEP, 1990). As indicated in Exhibits G-1 through G-3 of this FOST, the terms of the transfer deeds for parcels on the Main Base do not affect the rights and obligations of parties under the FFA. There are no other environmental compliance agreements, permits, or orders associated with the Transfer Parcels.

3.11 Availability of References

Select references contained in Exhibit A are available at the public information repository at the Curtis Memorial Library, 23 Pleasant Street, Brunswick, Maine. With the closure of NASB, references are available upon request from the Navy Caretaker Site Office located in Building 53 at the former NASB and the Navy BRAC Program Management Office Northeast, located in Philadelphia, PA.

3.12 Notification to Regulatory Agencies and Public

The MEDEP and the USEPA have been advised of the proposed transfer. The USEPA and MEDEP have reviewed this FOST and its exhibits, and their comments on this FOST have been incorporated or otherwise addressed as detailed in Exhibit H. The FOST was made available to the public at the Curtis Memorial Library for a 40-day period starting November 30, 2011, and ending January 9, 2012. Notice of the availability of this FOST was provided in the Times Record (of Brunswick, Maine) on November 30, 2011. Copies of all transfer deed documentation will be made available to the USEPA and MEDEP representatives upon request after execution of the same.

4.0 FINDING OF SUITABILITY TO TRANSFER

Based on the information contained in this FOST, and the notices, restrictions, and covenants that will be contained in the transfer deeds, the Transfer Parcels are suitable for transfer for their intended reuse.

24 May 2012
Date

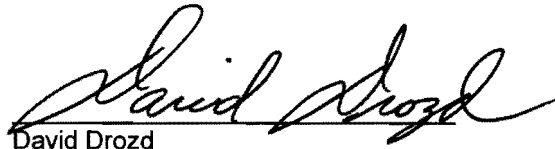

David Drozd
Director
BRAC Program Management Office Northeast
Philadelphia, Pennsylvania

EXHIBIT A

References

REFERENCES

AGVIQ-CH2M HILL, 2010. "Project Completion Report, Excavation of Gasoline-Contaminated Soil at the Naval Exchange Service Station Site", Naval Air Station Brunswick, Revision No. 01. December.

AGVIQ-CH2M HILL, 2011. "Vapor Intrusion Study at the Family Services Center (Building 27) Naval Air Station Brunswick, Maine." February.

DoN (Department of the Navy), United States Environmental Protection Agency Region 1, and the State of Maine, 1990. "Federal Facility Agreement under CERCLA 120(h) as amended." October.

DoN, 1999. "Record of Decision for Site 9, Naval Air Station, Brunswick, Maine. Engineering, Science, and Technology." September.

DoN, 2000. "Explanation of Significant Difference for the Record of Decision for the Installation Restoration Program Remedial Action for the Eastern Plume at Naval Air Station Brunswick. December.

DoN, BRAC PMO, 2006. "Final (Revision 2) Environmental Condition of Property Report for the Naval Air Station Brunswick, Maine." May.

DoN. 2010. "Final Environmental Impact Statement for the Disposal and Reuse of Naval Air Station Brunswick, Brunswick, Maine." November.

DoN. 2011a. "Record of Decision for the Disposal and Reuse of Naval Air Station Brunswick, Maine." January.

DoN, BRAC PMO, 2011b. "Finding Of Suitability To Transfer FOST 2011-2, Aboveground Utility Features (Approximately 0.5 Acres), Former Naval Air Station Brunswick, Brunswick, Maine, And Topsham Annex, Topsham, Maine." August.

DoN, 2012. "Environmental Fact Sheet for the Removal of the Casco Bay Pipeline." January.

EA Engineering, Science and Technology, 2006. Letter to L. Monaco, Re: Revised Screening Values for Surface Water, Seep Water, and Sediment, Naval Air Station, Brunswick, Maine. January.

GZA GeoEnvironmental, 1997. "Environmental Baseline Survey, Defense Fuel Support Point – Casco Bay Terminal, Casco Bay-to-Brunswick Naval Air Station Pipeline, South Harpswell, Maine." November.

H&S Environmental, 2011. "Final Sites 1 & 3, Monitoring Event 35 Report, September, 2009, Naval Air Station Brunswick, Maine." February.

James W. Sewall Company, 1953. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, ME. June 29.

James W. Sewall Company, 1958. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, ME. October 9.

James W. Sewall Company, 1978. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, ME. November 22.

James W. Sewall Company, 1981. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, ME. October 17.

James W. Sewall Company, 1984. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, ME. April 23.

James W. Sewall Company, 1989. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, ME. April 2.

James W. Sewall Company, 1993. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, ME. November 8.

James W. Sewall Company, 1997. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, ME. May 27.

James W. Sewall Company, 1997. NAS Brunswick Aerial Photographs. James W. Sewall Company, Old Town, ME. November 8.

Maine Department of Environmental Protection (MEDEP), 2011. MEDEP Spills Database, Augusta, ME. Accessed August 2011.

Matrix Design Group. 2007. "BNAS Reuse Master Plan. Prepared for the Brunswick Local Redevelopment Authority." December.

Naval Air Station Brunswick (NASB), 2001. "Consensus Statement. No Further Actions Required Under CERCLA for Sites 14, 15, 16, and 18". July.

NASB Environmental Department Records, 2005. "Environmental Incident Log Books 1 and 2 (July 1988 – July 2005)". NAS Brunswick, Maine.

NASB Environmental Department Records, 2009. Master PCB Transformer Inventory, NAS Brunswick, Maine. April.

NASB Environmental Department Records, 2010. Master/Historical Aboveground and Underground Storage Tank Inventory. NAS Brunswick, Maine. November.

NASB Public Works Department (PWD), 1943. US Naval Air Station, Brunswick Maine, Building Site Plan Showing Locations of Underground Water Distribution Lines and Hydrants. NAS Brunswick, Maine. September.

NASB PWD, 1946. Map of US Naval Air Station, Brunswick, Maine, Showing conditions on June 30, 1946, NAS Brunswick, Maine. June 30.

NASB PWD, 1952. Map of US Naval Air Station, Brunswick, Maine, Showing conditions on June 30, 1952, NAS Brunswick, Maine. June 30.

NASB PWD, 1956. General Station Map, Enclosure 2. NAS Brunswick, Maine.

NASB PWD, 1957. Map of US Naval Air Station, NAS Brunswick, Maine.

NASB PWD, 1962. Map of Streets, US Naval Air Station, Brunswick, Maine.

NASB PWD, 1975. General Development, Existing and Planned, Operations Area, US Naval Air Station, Brunswick, Maine.

NASB PWD, 1983. Existing Conditions Map. Public Works Department Drawing No. 2157, NAS Brunswick, Maine.

NASB PWD, 1989. Existing Conditions Map. Public Works Department Drawing No. 2157, NAS Brunswick, Maine. Revised April 2.

NASB PWD, 2006. Brunswick Naval Air Station Base Map, NAS Brunswick, Maine.

Naval Energy and Environment Support Activity (NEESA), 1983. "Initial Assessment Study for Naval Air Station Brunswick, Maine". June.

Naval Facilities Engineering Command Mid-Atlantic (NAVFAC Mid-LANT), 2007. "CERFA Identification of Uncontaminated Property at the Naval Air Station Brunswick, Brunswick Maine." June.

Naval Facilities Engineering Command Mid-Atlantic (NAVFAC Mid-LANT), 2010. "Letter to the Commanding Officer, NASB, Subject: Request for Explosives Safety Certification/Site Approval for Closure of Potential Explosion Site, Naval Air Station Brunswick, Maine. Enclosure (1) approved for explosives safety certification and final safety approval. July 7, 2010.

Naval Ordnance Safety and Security Activity (NOSSA), 2010. "Letter to the Commanding Officer, NASB, Subject: Closeout Inspection of NASB". April 13, 2011

Sanders, Carla, NASB Asbestos Program Mgr/Lead Coordinator, 2010. Personal Communication Re: Abandoned Steam Pipes. February.

Sanders, 2011. "Lead and Asbestos Containing Building Materials Summaries." NAS Brunswick Public Works Department. February-May.

Tetra Tech, 2010a. "Third Five Year Review, Naval Air Station Brunswick, Maine". September.

Tetra Tech, 2010b. "RCRA Partial Closure Report for Building 18, Golf Course Storage. Naval Air Station Brunswick, Maine." December.

Tetra Tech, 2010c. "RCRA Partial Closure Report for Building 20, Navy College Office Parcel. Naval Air Station Brunswick, Maine." October.

Tetra Tech, 2010d. "RCRA Partial Closure Report for Building 31, Navy Lodge. Naval Air Station Brunswick, Maine." January.

Tetra Tech, 2010e. "RCRA Partial Closure Report for Building 34, Golf Shed and Building 78, Golf Clubhouse. Naval Air Station Brunswick, Maine." December.

Tetra Tech, 2010f. "Final RCRA Partial Closure Report for Building 585, Chapel. Naval Air Station Brunswick, Maine." December.

Tetra Tech, 2010g. "RCRA Partial Closure Report for Building 632, NMCB-27/Trainer Building Parcel. Naval Air Station Brunswick, Maine." October.

Tetra Tech, 2010h. "Final RCRA Partial Closure Report for Old Taxiway Area. Naval Air Station Brunswick, Maine." December.

Tetra Tech. 2011a. "Technical Memorandum, Building 87 Groundwater Assessment, Naval Air Station Brunswick, Maine." April. 2011.

Tetra Tech. 2011b. "Technical Memorandum, Groundwater Screening Investigation, Former Building 35, Naval Air Station Brunswick, Maine." April. 2011.

Tetra Tech, 2011c. "RCRA Partial Closure Report for Building 11, NEX Retail Complex Parcel. Naval Air Station Brunswick, Maine." February.

Tetra Tech, 2011d. "RCRA Partial Closure Report for Building 22, Golf Maintenance Building Awning and Building 39, Golf Maintenance Building. Naval Air Station Brunswick, Maine." March.

Tetra Tech, 2011e. "Revised Final RCRA Partial Closure Report for Building 23, Car Wash Parcel. Naval Air Station Brunswick, Maine." May.

Tetra Tech, 2011f. "Revised Final RCRA Partial Closure Report for Building 87, Anti-Submarine Warfare Operations Center (ASWOC) Parcel. Naval Air Station Brunswick, Maine." July.

Tetra Tech, 2011g. "Final RCRA Partial Closure Report for Building 211, Field House Parcel. Naval Air Station Brunswick, Maine." May.

Tetra Tech, 2011h. "RCRA Partial Closure Report for Building 309, Golf Pumphouse. Naval Air Station Brunswick, Maine." March.

Tetra Tech, 2011i. "Final RCRA Partial Closure Report for Building 583, Bowling Center/Recreation Mall Parcel. Naval Air Station Brunswick, Maine." April.

Tetra Tech, 2011j. "Revised Final RCRA Partial Closure Report for Building 750, Transient Visitors Quarters Parcel. Naval Air Station Brunswick, Maine." July.

Tetra Tech, 2011k. "Final RCRA Partial Closure Report for Naval Mobile Construction Battalion 27 Compound. Naval Air Station Brunswick, Maine." April.

Tetra Tech, 2011l. "Final RCRA Partial Closure Report for Jet Fuel Storage Area. Naval Air Station Brunswick, Maine." May.

Tetra Tech, 2011m. "Final RCRA Partial Closure Report for Golf Course Area, Naval Air Station Brunswick, Maine." April.

Tetra Tech, 2011n. "Site Investigation for Four Areas of Potential Interest and Supplemental Groundwater Characterization of Buildings 225 and 252, Naval Air Station Brunswick, Maine." April.

Tetra Tech, 2011o. "Technical Memorandum, Groundwater Screening Investigation Former Hangars 1, 2, And 3, Former Naval Air Station Brunswick, Maine." June.

Tetra Tech, 2011p. "Revised Final RCRA Partial Closure Report for Building 309, Golf Pumphouse. Naval Air Station Brunswick, Maine." November.

Tetra Tech, 2011q. "Revised Final RCRA Partial Closure Report for Golf Course Area, Naval Air Station Brunswick, Maine." November.

Tetra Tech, 2011r. "Munitions Response Site Identification and Notification Report". November.

Tetra Tech, 2012a. "Eastern Plume Land Use Control Boundary Update at the former Naval Air Station Brunswick". February.

Tetra Tech, 2012b. "Background Study for Naval Air Station Brunswick, Naval Air Station Brunswick, Brunswick, Maine." Prepared for Naval Facilities Engineering Command, Mid-Atlantic. February.

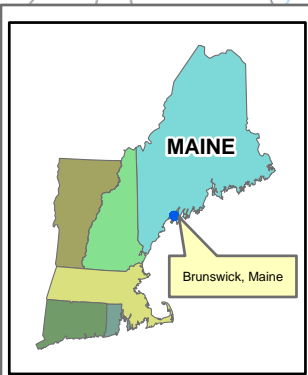
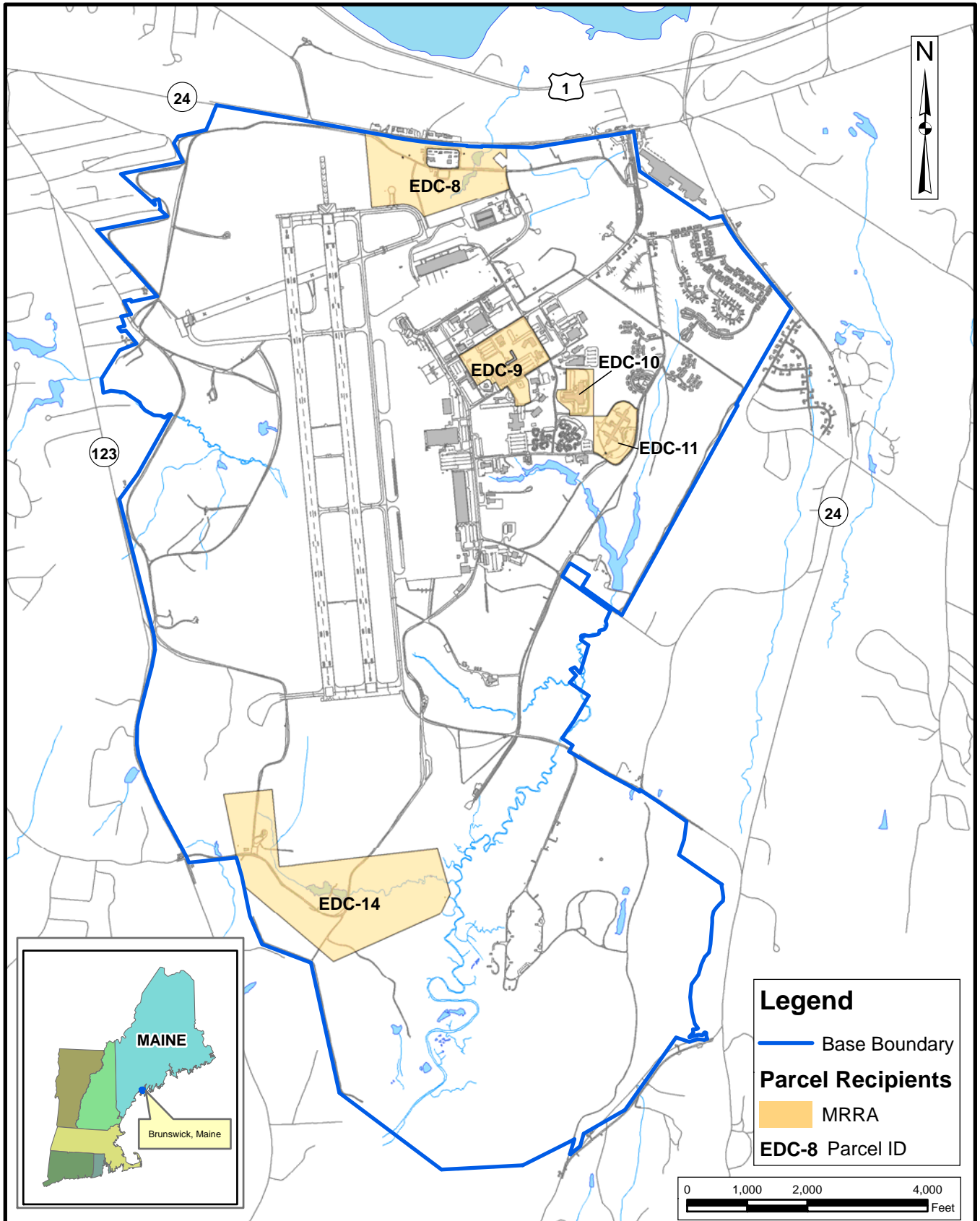
U.S. Environmental Protection Agency, Environmental Photographic Interpretation Center, 1987. "Site Analysis Brunswick Naval Air Station, Vol. I & 2".

U.S. Environmental Protection Agency, Maine Department of Environmental Protection, and DON, 2001. "Naval Air Station Brunswick Installation Restoration Program Consensus Statement, No Further Actions Required Under CERCLA for Sites 14, 15, 16, 18." July.

World Trade Center, 2003. Table A-3 Settled Dust Screening Values and Supporting Toxicity Criteria from World Trade Center Indoor Environment Assessment: Selecting Contaminants of Potential Concern and Setting Health-Based Benchmarks, May.

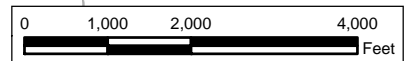
EXHIBIT B

Figures and Tables



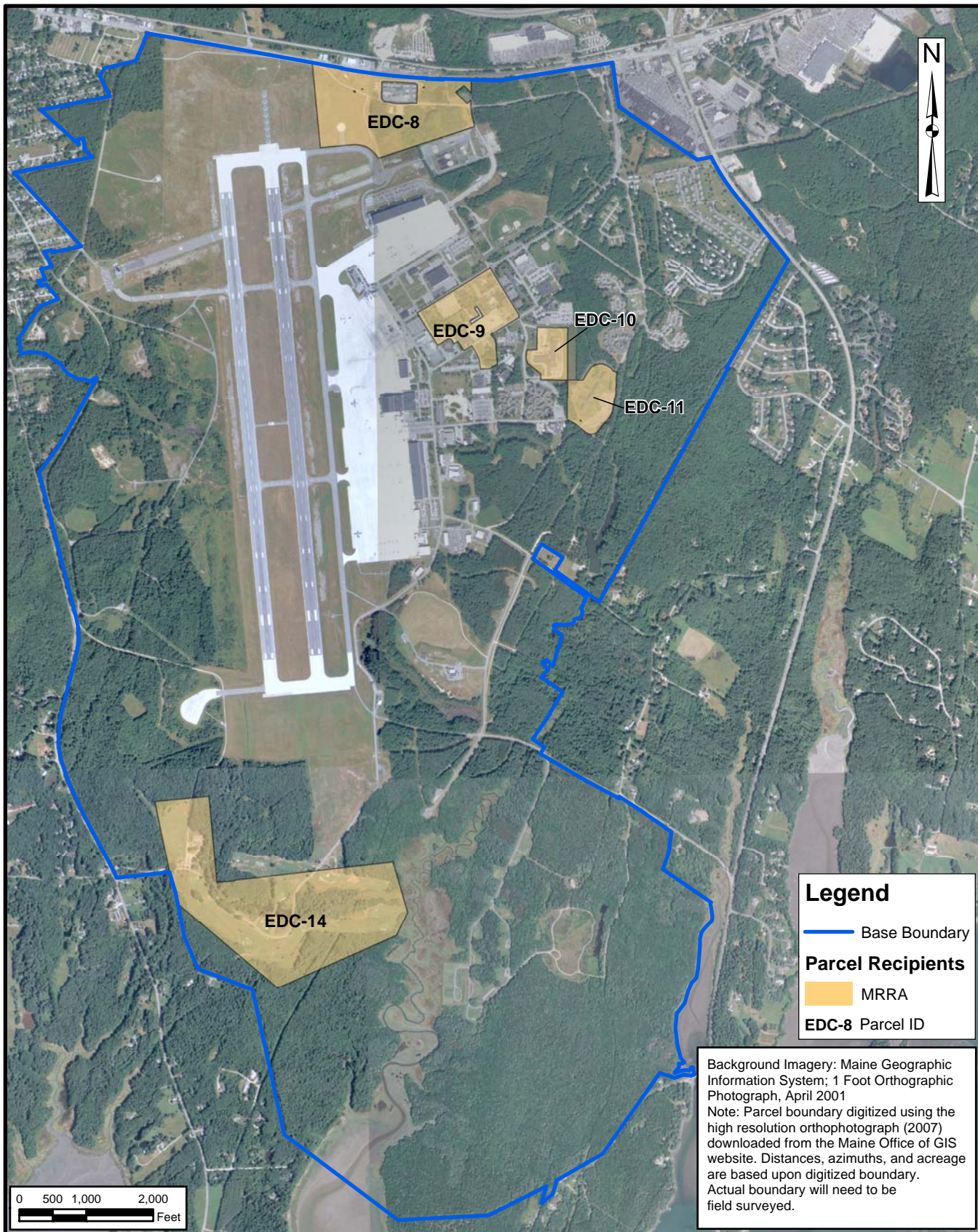
Legend

- Base Boundary
- Parcel Recipients**
- MRRA
- EDC-8 Parcel ID



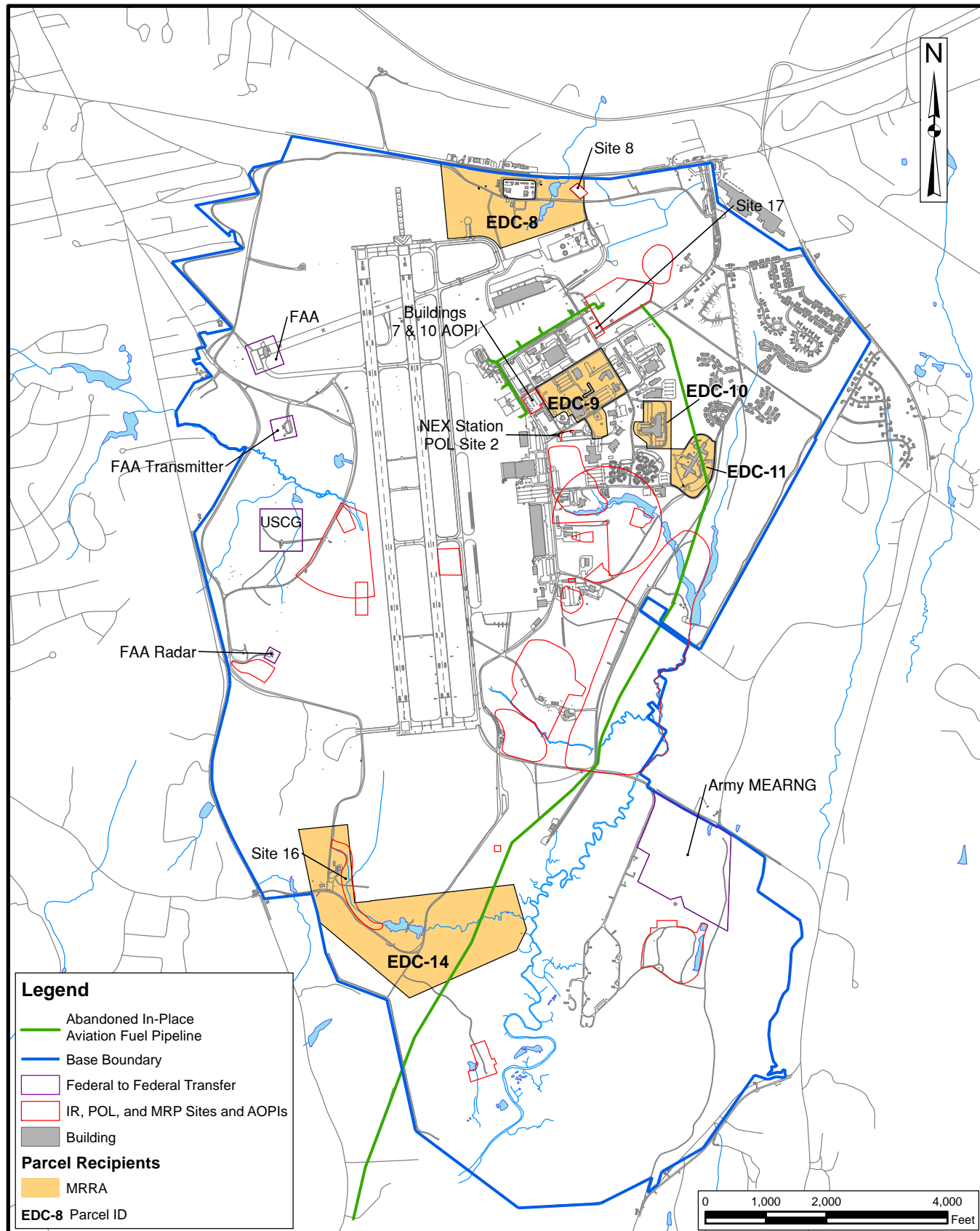
LOCATION MAP
FINDING OF SUITABILITY TO TRANSFER
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK
BRUNSWICK, MAINE

SCALE AS NOTED	
FILE G:\NASB_FOST_2012_1_FIGB-1.MXD	
REV 0	DATE 03/14/12
FIGURE NUMBER B-1	



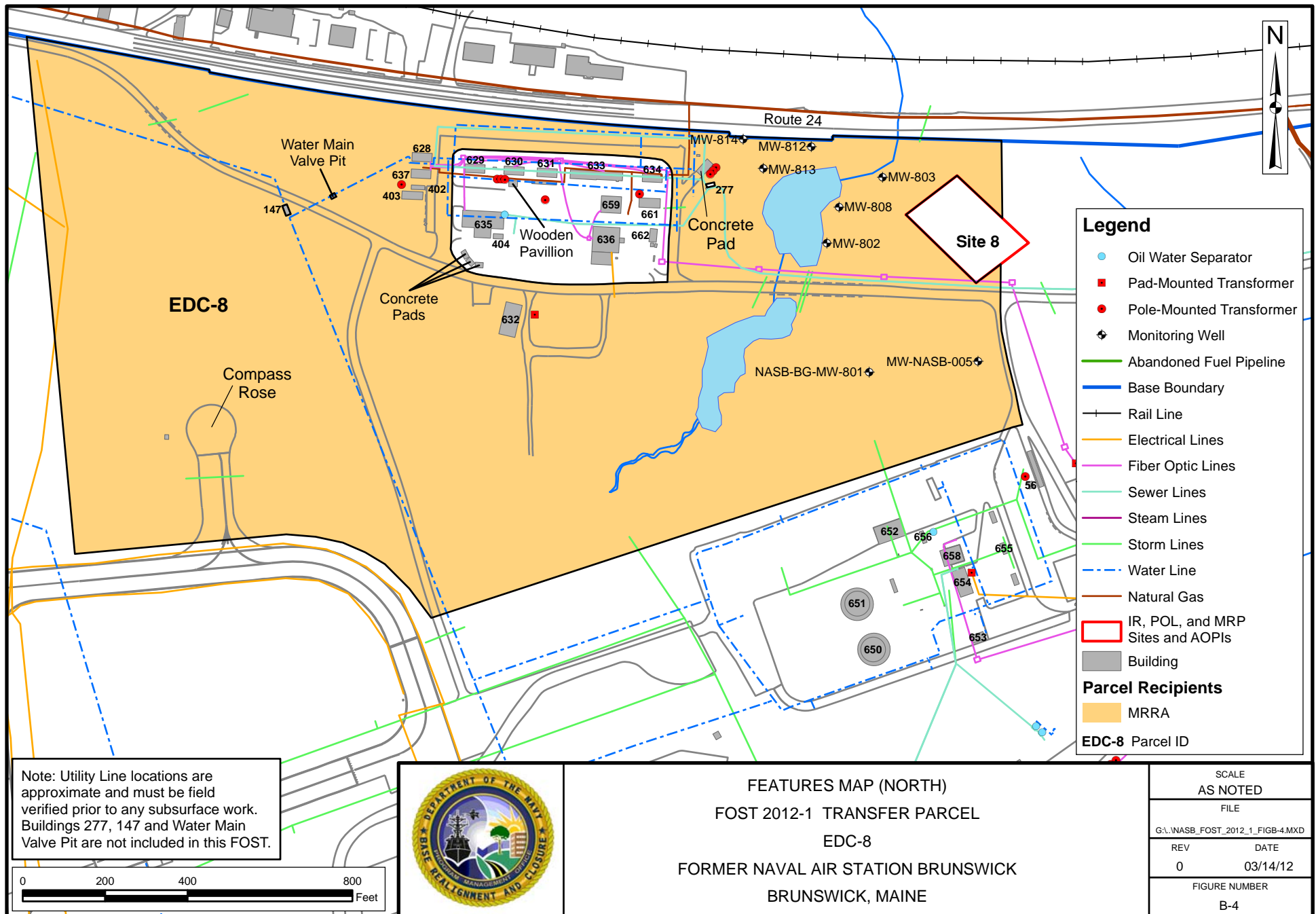
AERIAL VIEW
 FINDING OF SUITABILITY TO TRANSFER
 FOST 2012-1 TRANSFER PARCELS
 FORMER NAVAL AIR STATION BRUNSWICK
 BRUNSWICK, MAINE

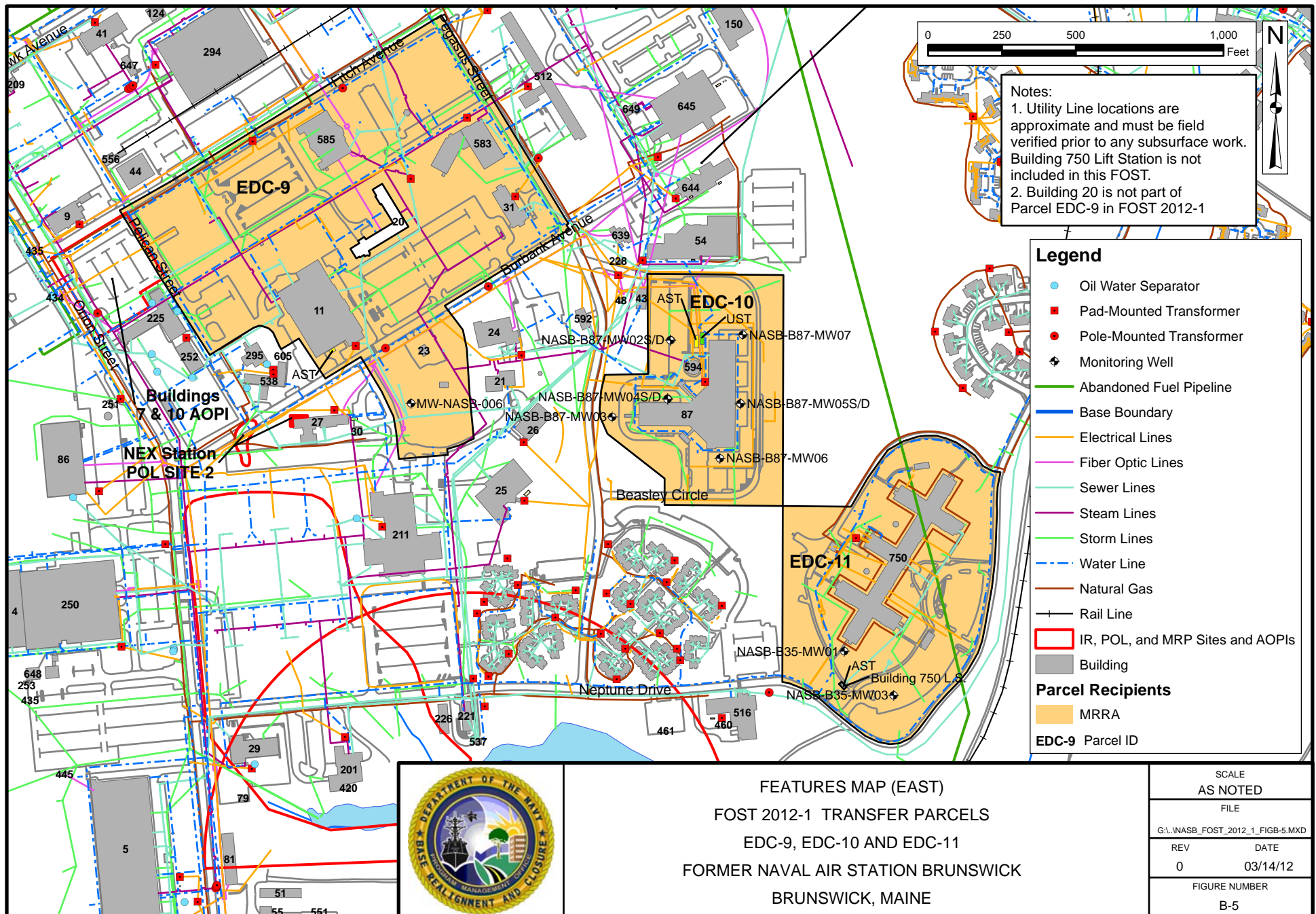
SCALE AS NOTED	
FILE	
G:\NASB_FOST_2012_1_FIGB-2.MXD	
REV	DATE
0	03/14/12
FIGURE NUMBER	
B-2	



FEATURES MAP
FINDING OF SUITABILITY TO TRANSFER
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK
BRUNSWICK, MAINE

SCALE AS NOTED	
FILE	
G:\NASB_FOST_2012_1_FIGB-3.MXD	
REV	DATE
0	03/14/12
FIGURE NUMBER	
B-3	





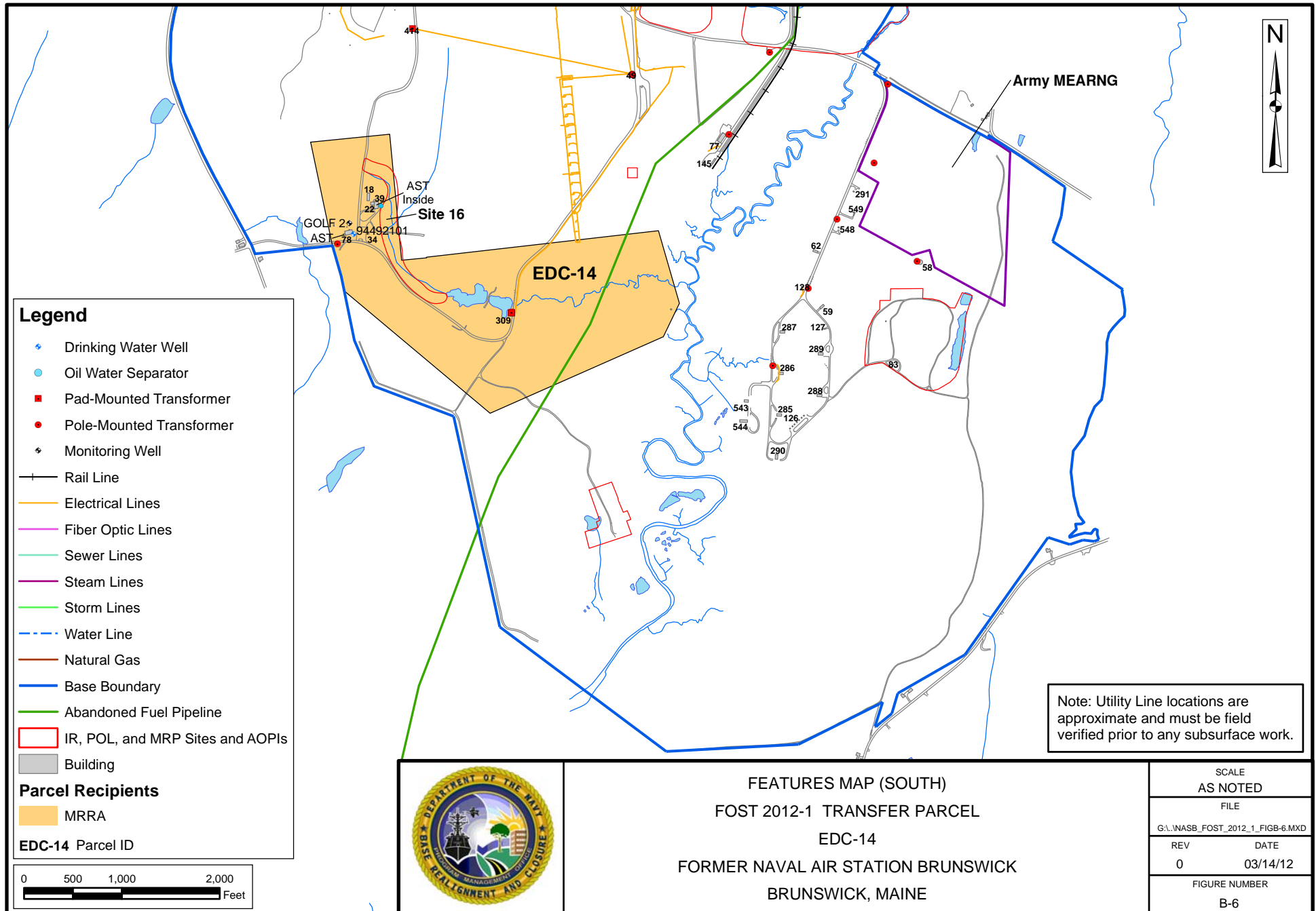


TABLE B-1
CURRENT AND FORMER BUILDINGS AND LAND AREAS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 1 OF 7

Parcel ID and Approx. Acres	Building and Surrounding Land	Year Constructed	Year Demolished	Approximate Building Area (SF)	Description
Existing Buildings and Structures - MRRRA Parcels EDC-8, EDC-9, EDC-10, EDC-11, and EDC-14					
EDC-8	402	2004	NA	768	Mobile Trailer CPO Mess; single-story, wood-framed and metal-sided trailer-type structure; interior consists of a single room with wood paneling and carpet flooring.
	403	2004	NA	320	Training Classroom; single-story, wooden structure; interior consists of a single, unfinished room.
	628	1983	NA	970	Administration Building; single-story, metal-sided structure on concrete slab-on-grade foundation; interior consists of three office spaces; building identification (ID) number 628 was previously assigned to another structure called "Weapons Magazine" which was located in southern section of NASB. Labeled as B657 on NASB 2006 Base Map.
	632	2006	NA	3,200	NMCB-27 Training Building; one-story structure on concrete slab foundation; training facility for maintenance of construction equipment; comprised of office, classroom, and garage spaces; building ID number previously assigned to a building that was combined with current B633 via an addition.
	637	1983	NA	970	Administration Building; single-story, metal-sided structure on concrete slab-on-grade foundation; interior consists of three office spaces; building identification number 637 was previously assigned to Line Shack, Hangar No. 1 North. Labeled as 658 on the NASB 2006 base map.
	Compass Rose	1956	NA	3,100	Concrete pad located southwest of SeaBee Compound; approximately 125 feet in diameter, with a navigational compass painted on the concrete pad surface; used to calibrate a plane's internal compass.

TABLE B-1
CURRENT AND FORMER BUILDINGS AND LAND AREAS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 2 OF 7

Parcel ID and Approx. Acres	Building and Surrounding Land	Year Constructed	Year Demolished	Approximate Building Area (SF)	Description
EDC-8	Open Land	NA	NA	NA	Open land east, west and south of the NMCB 27 (SeaBee) Compound (i.e., the buildings listed above); consists mainly of undeveloped, wooded (east and south), and/or grass-covered (west and south) areas; eight monitoring wells and Androscoggin Ponds 1 and 2 are located east of the compound; B147 (Water Meter Pit Shelter), B277 (Sewage Pumping Station), and the Water Main Valve Shelter are located within Parcel EDC-8, but are not part of this transfer as they were included in FOST 2011-2 (Water, Wastewater, and Electrical Utilities); Installation Restoration Program Site 8 (Perimeter Road Disposal Site) has been carved out of the eastern side of Parcel EDC-8 and is not included in this transfer. Parcel EDC-8 does not include the central portion of the Seabee Compound.
EDC-9	11	1981	NA	52,381	Navy Exchange Retail Complex; one-story, steel-framed structure with concrete-block bearing walls on a foundation; retail complex that serviced military and former military personnel and their families; included a retail show room and mini-mart, warehouse area, garden shop, optical shop, beauty and barber shops, gift shop, fast food service area, restaurant/café, retail cleaners distribution and tailoring, cash cage, office spaces, and asphalt parking lots; former Buildings 19, 80, 81 and 82 were located in the footprint of B11, and former Buildings 17 and 18 were located adjacent to B11.
	23	1994	NA	1,335	Car Wash; cement-block, single level building on concrete slab foundation; self-service car wash structure with two enclosed bays surrounded by asphalt parking area and grass; floor drain in each bay is configured as an oil/water separator (OWSs 23.1 and 23.2); between bays is a mechanical room; the foundation for former B79 (Hobby Shop Storage) is located south-southeast of B23; building identification number 23 was previously assigned to the former Ships Service and Auditorium and to the former Gym/Naval Exchange/Cafeteria/Country Store.

TABLE B-1
CURRENT AND FORMER BUILDINGS AND LAND AREAS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 3 OF 7

Parcel ID and Approx. Acres	Building and Surrounding Land	Year Constructed	Year Demolished	Approximate Building Area (SF)	Description
EDC-9	31	1999	NA	15,054	Navy Lodge; wood-frame, two-level building on concrete slab foundation; contains 28 hotel units with kitchenettes, vending areas, lobby, laundry facilities, and storage; portions of former Buildings 21 and 22 are within the footprint of B31; building identification number 31 was previously assigned to an Incinerator Building.
	583	1965	NA	19,380	Bowling Center/Recreation Mall; single-story, metal-frame building on concrete, cast-in-place, slab foundation; served as a recreation center for military families until January 2011 when it ceased operations; original, eastern portion of building houses a bowling alley; western portion of building (constructed in 2000) consists of a number of recreational areas, function rooms, a bar, a restaurant, and a children's play area; includes Structure WWW, an 8' x 12' x 8' metal shed with wooden floor used to store landscaping materials (lawn mower, plant pots, etc.); former location of B21 and B614.
	585	1965	NA	13,610	Chapel; one story, brick-cased, wood-framed structure on concrete slab-on-grade foundation; used for religious services and related activities, and consists of the main chapel, a north wing, and a south wing; interior space includes the main chapel, a small chapel, offices, classrooms, fellowship hall, kitchen, lounge, electric room, and storage spaces; includes Structure III, a 2' x 4' x 4' plastic shed on a wooden pallet, and Structure JJJ, an 8' x 10' x 8' wooden storage shed on a concrete slab; former location of B47 and B34.

TABLE B-1
CURRENT AND FORMER BUILDINGS AND LAND AREAS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 4 OF 7

Parcel ID and Approx. Acres	Building and Surrounding Land	Year Constructed	Year Demolished	Approximate Building Area (SF)	Description
EDC-10	87	1988	NA	52,513	Anti-Submarine Warfare Operations Center (ASWOC); multiple-room, single-level building on concrete slab foundation with partial basement; interior consists of three segments – A (administrative offices and classrooms), B (offices, telecommunications rooms, message processing centers, and electrical rooms), and C (communications offices, briefing theater, training rooms, and electrical repair rooms), and a partial basement that includes a mechanical room containing an air-handling unit, a back-up battery, and an electrical unit; located on former Air Force compound.
	594	1950	NA	900	Former Air Operations Radar Tower/Mechanical Room for ASWOC; former US Air Force radar tower building currently being used as a boiler room and for storage space; first floor is a boiler room containing four generators and two boilers for B87; external, enclosed stairway leads to second floor that housed radar equipment and gear storage; located on former Air Force compound.
EDC-11	750	2005	NA	140,000	Transient Visitors Quarters; two-story, brick-cased (lower level) and vinyl-sided (upper level), wood-framed structure on concrete slab-on-grade foundation; served as a 250-room (480-bed) military hotel and housed enlisted visitors to the base; also includes front lobby, lounge areas, housekeeping storage areas, laundry room, meeting rooms, various maintenance rooms (electric and telephone, boiler/sprinkler), and a universal-waste and bulk cleaning supplies storage area; associated structures include three smoking area gazebos (Structures SSS, YYY, and ZZZ), two storage sheds (Structures RRR and UUU), a covered, picnic-pavilion area, a covered, bike-storage area, and a brick-faced garage; surrounded by grass- and tree-covered areas and an asphalt-paved parking lot; a pad-mounted transformer and sanitary sewage lift station with pad-mounted generator on the parcel was included in the Water, Wastewater, and Electrical Systems FOST (FOST 2011-2); a north/south running abandoned-in-place aviation-fuel pipeline (Casco Bay Pipeline) passes under B750; former B35 was located under southern end of parking lot, and former T-207 and T-208 were located under southern end of B750.

TABLE B-1
CURRENT AND FORMER BUILDINGS AND LAND AREAS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 5 OF 7

Parcel ID and Approx. Acres	Building and Surrounding Land	Year Constructed	Year Demolished	Approximate Building Area (SF)	Description
EDC-14	18	1997	NA	2,010	Golf Cart Storage; single-story, wood-framed structure on concrete slab foundation; unfinished building interior consists of a single room used for storage of golf carts and irrigation parts and supplies; building ID number formerly assigned to Barracks in another area of installation.
	22	mid-1990s	NA	1,003	Golf Maintenance Building Awning; open, single-story, wooden awning structure covering a concrete slab maintenance area sloped to a metal-grate-covered, blind sump; used mainly as a pesticide and fertilizer loading and storage area and provided shelter for minor maintenance activities for golf carts and mowers; three temporary structures (steel storage containers) are located along the western portion of B22 - Structures U4 and V4 (5' x 6' x 6') and Structure W4 (8' x 10' x 8') stored bagged, granular fertilizers and pesticides materials applied on the golf course fairways and greens; building identification number 22 was previously assigned to a building that was used as the Brig on the central portion of NASB.
	34	Unknown	NA	24	Golf Shed; single-story, wooden structure; interior consists of a single room used as a hunt master shed, providing hunting maps and registrations for on-base archery hunting since approximately 2007; building identification number 34 was previously assigned to a building that was used as an armory, post office, chaplains office, and Navy Exchange office, which was located in the central portion of NASB.
	39	1985	NA	2,800	Golf Maintenance Building; single-story, concrete block structure on concrete slab foundation; interior consists of a work shop, maintenance area for golf carts and lawn mowers, office area, pesticide-mixing room, and garage area for mower storage.
	78	1981	NA	3,040	Golf Clubhouse; single-story, wood-framed structure on concrete slab foundation; interior consists of a restaurant with dining area, bar and kitchen; a golfing equipment retail space, a locker room, food and retail storage spaces, and a mechanical room; Structure A5, a temporary wooden shed (4' x 5' x 6'), housed sporting goods for the clubhouse; potable water is provided by a public, domestic water-supply well (PWSID 94492101) near the southeastern exterior of B78.

TABLE B-1
CURRENT AND FORMER BUILDINGS AND LAND AREAS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 6 OF 7

Parcel ID and Approx. Acres	Building and Surrounding Land	Year Constructed	Year Demolished	Approximate Building Area (SF)	Description
EDC-14	309	1954	NA	180	Golf Pumphouse; single-story, wood-framed structure on concrete slab foundation; interior is unfinished and serves as a mechanical room for the golf course irrigation system electric pumps and ancillary electrical and mechanical components; pump intake pipe is located on the north side of the building and the discharge pipe exits the building on its south side.
	Golf Course	1958	NA	113	9-hole, public golf course and driving range; associated buildings described above.
Former Buildings and Structures - MRRRA Parcels EDC-9, EDC-10, EDC-11, and EDC-14					
EDC-9	4	1943	2000	Unknown	Administrative Building (Command Headquarters); southeast of B44 (across Fitch Avenue)
	17	1943	1979	Unknown	Barracks; adjacent to footprint of B11
	18	1943	1981-83	Unknown	CPO Barracks; adjacent to footprint of B11; building ID 18 now assigned to Golf Cart Storehouse
	19	1943	1965-75	Unknown	Marine Barracks; within footprint of B11; building ID 19 reassigned to Public Works Shops
	21	1943	1955	Unknown	Mess Hall; within footprints of B31 and B583; building ID 21 reassigned to Child Care Center
	22	1943	1,997	Unknown	Brig; within footprint of B31; building ID 22 reassigned to Golf Maintenance Building Awning
	23	1943	1981-83	Unknown	Ships Service and Auditorium/Gym/Navy Exchange/Cafeteria/Country Store; within footprint of display airplane at corner of Fitch Avenue and Pegasus Street; B23A addition added to building between 1977 and 1988
	30	1943	1,978	Unknown	Dispensary/Station Hospital/Dental Clinic; adjacent to footprint of B23; building ID 30 reassigned to FSC Storage
	34	1943	1989	Unknown	Armory (Marine Guard House); adjacent to footprint of B585; building ID 34 reassigned to Golf Shed
	47	1943	1965	Unknown	Chapel; within footprint of B585; building ID 47 reassigned to Ballfield Storage
	68	1943	1956	Unknown	Field House; within footprint of B31 parking lot

TABLE B-1
CURRENT AND FORMER BUILDINGS AND LAND AREAS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 7 OF 7

Parcel ID and Approx. Acres	Building and Surrounding Land	Year Constructed	Year Demolished	Approximate Building Area (SF)	Description
EDC-9	79	1979	1989	Unknown	Hobby Shop Storage; slab foundation still present southeast of B23; relocated to B29 Auto Hobby Shop
	80	1943	1965	Unknown	Sea Bag Lockers; within footprint of B11; building ID 80 reassigned to Maintenance Building
	81	1943	1965	Unknown	Sea Bag Lockers; within footprint of B11; building ID 81 reassigned to CHRIMP Facility
	82	1943	1965	Unknown	Sea Bag Lockers; within footprint of B11; building ID 82 reassigned to Isolation Facility
	252	1957	1990 (Moved)	Unknown	Hobby Shop (moved adjacent to B225 and building ID retained); former location adjacent to footprint of B23; building ID 252 also assigned to Winch House - South Array
	614	1975	1997	Unknown	Swimming Pool; adjacent to footprint of B583
EDC-10	593	1950	1988	Unknown	Communications; former Air Force (AF-12) radar dome; north and west of B87/B594
	595	1950	Unknown	Unknown	Storage; former AF-R8 radar dome north of B87
	596/597	1950	1988	Unknown	TSC/Communications Center; former AF-1/AF-2; north and west of B87/B594
	598	1950	1988	Unknown	Storehouse; former AF-3 radar dome; north and west of B87/B594
	612	1950	1988	Unknown	Disaster Preparedness; north and west of B87/B594
EDC-11	35	1943	1998	Unknown	A/C Maintenance; within footprint of B750 parking lot; building ID reassigned to Main Gate Sentry House
	T-207	1943	1998	Unknown	Communication Storage (Quonset Hut); within footprint of B750
	T-208	1943	1998	Unknown	Communication Storage (Quonset Hut); within footprint of B750
EDC-14	305	1957	1981	Unknown	Clubhouse (golf course)
	306	1957	1981	Unknown	Shed (golf course)

Note: Some construction and demolition dates of former buildings are approximate based on review of historical maps.

TABLE B-2
SUMMARY OF ENVIRONMENTAL SITES ON OR NEAR TRANSFER PARCELS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 1 OF 3

Site Number and Name	Location	Site Concern	Investigation and Remedial Action Summary and Status	Site-Specific Restrictions	Site Impact on Subject Property
IR Program Sites					
IR Site 8 Perimeter Road Disposal Area	Site 8 is adjacent to the northeast corner of Parcel EDC-8 but is not in the parcel.	Site 8 was a former disposal site for construction and demolition debris, from 1964 to 1974. Also solvents were reportedly disposed.	RI, focused FS, and ROD completed by 1993. No groundwater impact. Soil and sediment impacted primarily by PAHs and DDT. 8,900 cubic yards of construction debris, blacktop, airplane parts, and some contaminated soil placed in Site 1 & 3 landfill. Removal Action completed by 1996. Maine PE certified as remediated to approved levels. No further action required.	None required under CERCLA	No impact on Parcel EDC-8 from IR Site 8.
IR Site 16 Swampy Rd. Debris Site	Site 16 is within Parcel EDC-14.	Debris found at ground surface with no indications of buried waste.	Site Inspection conducted including magnetometer survey, test pit excavation and sampling of soil, surface water and sediment. Solid waste and a small area of soil with elevated lead removed. No further action required under CERCLA per 2001 Consensus Statement signed by EPA, MEDEP, and Navy.	None required under CERCLA.	No impact on Parcel EDC-14 from IR Site 16.
IR Site 17 Former Building 95	Site 17 is within 200 feet and northeast of Parcel EDC-9.	B95 housed base pest control operations that included storage, mixing, and disposal of pesticides and herbicides from 1955 until 1985 when these operations were relocated to B647.	RI conducted in 2008 and report finalized in July 2011. Approximately 118 tons of soil removed south of Avenue B in 2009, and approximately 287 tons of soil removed north of Avenue B in 2010. LTM of groundwater will continue for several rounds but no unacceptable risk to receptors remains for soil or groundwater. No further action for soil ROD signed in September 2011.	Navy maintained soil excavation/disturbance and groundwater restrictions at Site 17 but the restrictions expired upon base closure. No LUCs required for soil in accordance with ROD. Groundwater is still being monitored. The Navy is in the process of updating long-term land use controls for the entire base.	No impacts on Parcel EDC-9 from Site 17. Groundwater flows toward the southeast at Site 17, away from Parcel EDC-9. There is no remaining risk associated with soil post-removal. Groundwater will be monitored for several more rounds at the site to confirm that risk has been reduced. Groundwater restriction required for Parcel EDC-9 to preserve integrity of groundwater monitoring at Site 17.

TABLE B-2
SUMMARY OF ENVIRONMENTAL SITES ON OR NEAR TRANSFER PARCELS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 2 OF 3

Site Number and Name	Location	Site Concern	Investigation and Remedial Action Summary and Status	Site-Specific Restrictions	Site Impact on Subject Property
AOPI Sites					
AOPI B7 & B10	Adjacent to and west of Parcel EDC-9	Allegations of dumping and leaks at underground storage tanks at former aircraft and other maintenance shops on B7 & B10 parcel	<p>A soil and groundwater investigation was conducted in October 2010 for B7 & B10. The April 2011 report noted that VOCs (primarily PCE and benzene), PAHs, and metals exceeding screening criteria were present in subsurface soil samples and in groundwater on the B7 & B10 AOPI north of B225 and B252. Findings are currently under review and the Navy is discussing appropriate action with EPA and MEDEP.</p> <p>In May 2011, as part of the RCRA Closure, test pit excavation confirmed that a former B7 & B10 UST suspected to be present (based on geophysical screening) had been previously removed.</p>	<p>The Navy is in the process of updating long-term LUCs for the entire base.</p> <p>A groundwater use restriction is recommended for AOPI B7 & B10.</p>	<p>Low levels of groundwater contamination were identified on the B7 & B10 property, west of Parcel EDC-9.</p> <p>Based on these sampling results, there is currently no evidence the B7 & B10 AOPI has impacted Parcel EDC-9. However, a groundwater use restriction is required for Parcel EDC-9 to ensure there is no impact to the groundwater flow system near the B7 & B10 AOPI. Groundwater flow at B7 & B10 is to the southwest away from Parcel EDC-9.</p>

TABLE B-2
SUMMARY OF ENVIRONMENTAL SITES ON OR NEAR TRANSFER PARCELS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 3 OF 3

Site Number and Name	Location	Site Concern	Investigation and Remedial Action Summary and Status	Site-Specific Restrictions	Site Impact on Subject Property
Petroleum Oil and Lubricant Sites					
POL Site 2 – Navy Exchange Service Station Site (NEX)	The NEX is southwest and within 200 feet of Parcel EDC-9.	Release of gasoline from USTs and associated distribution system resulted in contamination of soil and groundwater.	Remedial efforts including soil vapor extraction (SVE)/aquifer air sparging, chemical oxidation and denitrification-based biodegradation failed to reduce GRO concentrations to acceptable levels. In 1989, a passive SVE vent to the northern wall of B27. In 2009, 7,507 tons of impacted soil and 3 USTS were removed to reduce continuing source of contaminants in groundwater. Soil at the northwest corner of B27 was jet grouted to reduce permeability. Based on April and September 2010 groundwater monitoring results, the VPH plume is shrinking. Based on a January 2011 VI study, vapor intrusion is not a concern.	<p>Site closure pending development of an LTM plan including periodic groundwater sampling</p> <p>The Navy has maintained soil excavation/ disturbance and groundwater use restrictions which expired upon base closure.</p> <p>The Navy is in the process of updating long-term land use controls for the entire base.</p>	<p>None. The remaining residual contamination from the site is southwest and downgradient of Parcel EDC-9.</p> <p>However, a groundwater restriction is required for EDC-9 to preserve the integrity of the remedy at the adjacent NEX Site.</p>

Note:

This is a summary of the current or former IR Program (IR) Sites, Munitions Response Program (MRP) Sites, Petroleum, Oil, and Lubricant (POL) Sites, and Areas of Potential Interest (AOPIs) located within and adjacent to (within 200 ft of) the transfer parcels. Site-specific restrictions currently in effect for the environmental sites are described in column 5. Table B-2 indicates if restrictions are also warranted on the affected transfer parcels to prevent impact to ongoing investigations or to protect the integrity of existing remedies at adjacent Sites. This information is current as of February 2012.

Acronyms:

AOPI – Area of Potential Interest
GRO – Gasoline Range Organics
IR – Installation Restoration
LTM – Long-term monitoring

PAHs – Polycyclic aromatic hydrocarbons
POL – Petroleum, Oil, Lubricant
ROD – Record of Decision
TCRA- Time Critical Removal Action

VI – Vapor intrusion
VOCs – Volatile organic compounds
VPH – Volatile petroleum hydrocarbons

TABLE B-3
ENVIRONMENTAL ISSUES BY BUILDING AND LAND AREA
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 1 OF 2

Parcel	Building and Surrounding Land	Yr Constr	Hazardous Substances Stored or Released? ⁽¹⁾	Petroleum Products or Derivatives Released? (see UST/AST for Storage)	USTs ⁽²⁾	ASTs ⁽³⁾	OWSs ⁽⁴⁾	Munitions ⁽⁵⁾	LBP ⁽⁶⁾	ACM ⁽⁷⁾	Dielectric Fluid Equipment ⁽⁸⁾
MRRA Parcels EDC-8, EDC-9, EDC-10, EDC-11, and EDC-14											
EDC-8	402	2004	N	N	N	N	N	N	N	Y	N
EDC-8	403	2004	N	N	N	N	N	N	N	N	N
EDC-8	628	1983	N	N	N	N	N	N	Y	Y	N
EDC-8	632	2006	N	N	N	N	N	N	N	N	Y
EDC-8	637	1983	N	N	N	N	N	N	Y	Y	Y
EDC-8	Compass Rose	1956	N	N	N	N	N	N	Y	NA	N
EDC-8	Open Land	NA	N	Y	N	N	N	N	NA	NA	Y
EDC-9	11	1981	N	N	N	Y	N	N	N	Y	Y
EDC-9	23	1994	N	N	N	Y	Y	N	N	N	Y
EDC-9	31	1999	N	N	N	Y	N	N	N	N	Y
EDC-9	583	1965	N	N	N	Y	N	N	Y	Y	Y
EDC-9	585	1965	N	N	N	Y	N	N	Y	Y	Y
EDC-10	87	1988	Y	N	N	N	N	N	N	N	Y
EDC-10	594	1950	Y	N	Y	Y	N	N	Y	Y	N
EDC-11	Former 35	1943	N	N	Y	Y	N	N	NA	NA	N
EDC-11	750	2005	N	N	N	N	N	N	N	Y	Y
EDC-14	18	1997	N	N	N	N	N	N	N	N	N
EDC-14	22	1990s	N	N	N	N	N	N	N	N	N
EDC-14	34	Unknown	N	N	N	N	N	N	Unknown	N	N
EDC-14	39	1985	N	N	N	Y	Y	N	N	N	N
EDC-14	78	1981	N	N	Y	Y	N	N	N	Y	Y
EDC-14	309	1954	N	N	N	N	N	N	Y	Y	Y

**TABLE B-3
ENVIRONMENTAL ISSUES BY BUILDING AND LAND AREA
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 2 OF 2**

Notes:

Y/N - Yes, No NA - Not Applicable

- (1) See Exhibit C regarding storage and release thresholds.
- (2) All USTs have been removed; see Table B-5 for details.
- (3) Includes former (removed) and current (closed or active) ASTs. See Table B-6 for details.
- (4) See Table B-7 for current or closed OWSs
- (5) Weapons assembly, handling or storage.

- (6) LBP was banned for consumer use in 1978; Y signifies LBP present based on testing or construction date (pre-1978) of building; N signifies LBP not present based on testing or construction date (post-1978) of building. Established Federal lead standards by EPA/HUD quantify Lead Based Paint as 0.5% lead dry weight. Lead Containing Paint is any paint which contains lead as determined by a testing laboratory using a valid test method. Occupational Safety and Health Administration regulations do not indicate a specific level of lead that is permissible during maintenance, renovation, construction and demolition activities. Current manufacturing standards for paint allow up to 0.06% lead for residential use. Industrial paint applications can contain much higher concentrations. All painted surfaces should be considered to contain some level of lead. See Exhibit F.

- (7) While ACM may not have been identified in a building, analyses may not have been performed on all building materials such as sheetrock, joint compound, roofing shingles and sealant or window caulking. Former steamlines with ACM may be present. ACM is present in the subsurface abandoned-in-place Casco Bay Pipeline located in Parcels EDC-11 and EDC-14. Many materials continue to be manufactured containing asbestos. Materials considered suspect by EPA, MEDEP, and OSHA regulations should be sampled and analyzed prior to maintenance, renovation and demolition activities, and should be presumed to contain ACM. See Table B-8 and Exhibit E.
- (8) Transformers, regulators and switches as indicated in NASB Master PCB Transformer Inventory Database.

**TABLE B-4
SUMMARY OF DOCUMENTED SPILLS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 1 OF 2**

Parcel ID ⁽¹⁾	Location	Date	Material	Quantity (gallons)	DEP Notified	MEDEP Spill ID	Notes	Source ⁽²⁾
MRRRA Parcels EDC-8, EDC-9, and EDC-14								
EDC-8	Release at JFSI (B654 and 652) impacted EDC-8	3/26/1993 – 3/29/1993	Jet Fuel	63,500 (also reported as 67,000)	Y	P-187-1993	Release from AST at the JFSI went north through the storm drain system across EDC-8 and migrated to an unnamed wetland/tributary of the Androscoggin river north of Route 24 and Route 1 where it was contained by snow and ice. There was less impact on EDC-8 because of the steep-sided ravine and moderately high gradient of the stream. Most of the oil settled in the wetland north of Route 1. Navy coordinated with all appropriate entities for the spill response. Earthen weir dams and berms were constructed as part of the spill response. An estimated 45,000 gallons were recovered/recycled via Navy and Clean Harbors and estimated 10,000 gallons in marsh were eliminated via controlled burns in April 1993. Ecological assessments were conducted in 1993 and 1994 to confirm that impacts had been mitigated.	MEDEP Spills Database, NASB Environmental Incident Logbook
EDC-9	Adjacent to NEX Maintenance Department B11	8/5/1992 8/6/1992	Paint containers	14	N	NA	Fourteen 1-gallon and one 1-quart containers, some missing tops, and still containing paint, abandoned at the building. No mention of a spill. No further information provided in incident log book.	NASB Environmental Incident Logbook
EDC-9	B11 NEX Parking Lot	10/3/1993	Diesel	10	Y	P-624-1993	A 10-gallon diesel fuel oil release from a truck fuel tank was remedied by applying sand berms. Approximately 2 gallons were reported recovered, along with 0.5 cubic yards of impacted solids. No fuel was reported to have reached the storm drain system.	MEDEP Spills Database, NASB Environmental Incident Logbook
EDC-9	B11 NEX Parking Lot	3/10/1995	Asbestos	Unknown	Y	NA	Approximately 6 feet of steam trench collapsed; three vehicles and two people reported impacted by asbestos, with "probable release" to ambient air. MEDEP reportedly notified at 10:15, no further information provided.	NASB Environmental Incident Logbook
EDC-9	B11 NEX Parking Lot	12/9/1996	Gasoline	<1	N	NA	"Small amount of gasoline" reported released from a gasoline can in bed of Environmental Tech Services truck; reported as remedied by NASB Environmental Department and no impact to storm drains.	NASB Environmental Incident Logbook

**TABLE B-4
SUMMARY OF DOCUMENTED SPILLS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 2 OF 2**

Parcel ID ⁽¹⁾	Location	Date	Material	Quantity (gallons)	DEP Notified	MEDEP Spill ID	Notes	Source ⁽²⁾
EDC-14	Golf Course	5/7/1993	Fuel	<1	N	NA	Golf cart went into pond off bridge between 3 rd and 4 th hole as golfers swerved to avoid animal. Minimal fuel leak. Booms and pads applied and spill contained.	NASB Spill Run Report
EDC-14	Golf Course	7/31/2005	Gasoline	Unknown	Unknown	NA	Golf cart went into marsh between 3 rd and 4 th hole. Sheen noticed indicating some gasoline may have spilled. Booms and pads applied to contain spill to immediate area. Cart pulled up to higher ground.	NASB Spill Run Report

Notes:

(1) Parcel ID of potentially impacted areas.

(2) NASB Environmental Incident Log, Book 1, July 1988 to November 1999; NASB Environmental Incident Log, Book 2; February 2000 to July 2005. MEDEP Spills Database contained spills reported March 1979 to May 2011. Accessed May 2011. NASB Fire Department Spill Run Files 2002-2008.

Acronyms:

AST – Above ground storage tank

AvGas – Aviation gasoline

JFSI – Jet Fuel Storage Installation

JP – Jet Propellant

MEDEP – Maine Department of Environmental Protection

NA – Not applicable

NASB – Naval Air Station Brunswick

NFA – No further action

**TABLE B-5
UNDERGROUND STORAGE TANKS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, BRUNSWICK, MAINE**

PARCEL ID	TANK REGISTRATION NO.	LOCATION (BUILDING)	SIZE (GAL)	PRODUCT	YEAR INSTALLED	YEAR REMOVED	STATUS	REMARKS
MRRRA Parcels EDC-10, EDC-11, and EDC-14								
EDC-10	10045-498-2	594.0	4,000	Diesel	1996	NA	Present	Tank is aboveground with underground piping. See Table B-6
EDC-10	10045-069	594.0	6,000	Fuel Oil #2	1986	1992	Removed	Replaced with new UST
EDC-10	10045-498-1	594.1	4,000	Fuel Oil #1	1999	2009	Removed	Tank is aboveground with underground piping. See Table B-6
EDC-10	10045-490	594.1	3,000	Fuel Oil #2	1992	1999	Removed	Replaced with new AST
EDC-11	10045-467	Former 35.0	1,000	Fuel Oil #2	1974	1991	Removed	
EDC-11	10045-502	Former 35.1	550	Unknown	Unknown	2003	Removed	Discovered during B750 construction. May have been the former septic tank. Per MEDEP registered tank database, a #2 fuel oil tank with that number was installed in 1969 and removed in 2002.
EDC-14	10045-433	78.0	550	Fuel Oil #2	1980	1995	Removed	Replaced piping.

Notes:

UST data provided from NASB Environmental Department Master UST/AST database, updated per communication with NASB Environmental Personnel June 2011, which includes USTs installed from 1943 until 1999, and removed between 1988 and 2010; a Master UST List Dated 1996; Cross checked with MEDEP Registered Tank List accessed 8/30/2011.

TABLE B-6
ABOVEGROUND STORAGE TANKS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 1 OF 2

PARCEL ID	TANK NUMBER	LOCATION (BUILDING)	SIZE (GAL)	PRODUCT	PURPOSE	YEAR INSTALLED	YEAR REMOVED OR CLOSED	STATUS	REMARKS
MRRA Parcels EDC-9, EDC-10, EDC-11, and EDC-14									
EDC-9	A11.0	11	3,000	#1 Oil	Heating	1999	2009	Cleaned and closed in 2009	Good/Dual Fuel west side of B11.
EDC-9	A11.1	11	250	Cooking grease	Grease Container	2002	NA	Active	South side of B11, Building active at 6/17/11 site visit
EDC-9	A23.0	23	275	#1 Oil	Heating	1994	2002	Removed	Inside berm left
EDC-9	Unnamed	31	Unknown	Propane	Heating	1999	2001	Removed	Not included in Navy UST/AST Database
EDC-9	A583.0	583	250	Cooking grease	Grease Container	Unknown	2000	Removed	Good/Parking lot adjacent to building.
EDC-9	A583.1	583	2500	#1 Oil	Heating	1999	2009	Cleaned and closed	Good/Dual Fuel
EDC-9	A585.0	585	1,000	#1 Oil	Heating	1999	2009	Cleaned and closed	Good/Wood chip bldg/Dual Fuel
EDC-10	A594.0	594	4,000	Diesel	Heating	1996	NA	Active	Leak Detection / UST Reg#10045-498-2
EDC-10	A594.1	594	4,000	#1 Oil	Heating	1999	2009	Cleaned and closed	Leak Detection, UST Reg#10045-498-1/Dual Fuel
EDC-11	A35.0	Former 35	275	#1 Oil	Heating	1991	1998	Removed	Good. Building demolished
EDC-11	A35.1	Former 35	275	#1 Oil	Heating	1991	1998	Removed	Good. Building demolished
EDC-14	A39.0	39	275	Gasoline		Unknown	1995	Removed	NPP-Badly rusted
EDC-14	A39.1	39	275	#1 Oil	Heating	Unknown	NA	Active	(Inside of building), no placard observed, 6/17/11 site visit.
EDC-14	A39.2	39	250	Gasoline	Gasoline pump	1995	4/2011	Cleaned and closed	West side of building
EDC-14	A39.3	39	250	Diesel	Diesel pump	1995	4/2011	Cleaned and closed	West side of building
EDC-14	A39.4	39	250	Waste oil	Waste oil	2001	4/2011	Cleaned and closed	West side of building
EDC-14	A39.4	39	55	Waste oil		1997	2001	Removed	Good - Replaced by 250 GAL AST

TABLE B-6
ABOVEGROUND STORAGE TANKS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 2 OF 2

PARCEL ID	TANK NUMBER	LOCATION (BUILDING)	SIZE (GAL)	PRODUCT	PURPOSE	YEAR INSTALLED	YEAR REMOVED OR CLOSED	STATUS	REMARKS
EDC-14	A78.0	78	500	#1 Oil	Heating	1995	NA	Active	West side of building

Notes: AST data from NASB Master UST/AST database, which includes ASTs installed from 1967 through 2006 (or unknown), and removed between 1993 and 2011.

**TABLE B-7
OIL-WATER SEPARATORS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE**

Parcel ID	Location	Building/ Area Description	OWS Number*	Type	Discharge Point (Sanitary or Storm)	Volume (gal)	Source Description	Disposition/Notes	Source of Information
MRRA Parcels EDC-9 and EDC-14									
EDC-9	23	Car wash	11/16	Modified floor trench for car wash bay	Sanitary	63	Commercial wash	Closed. Removed 1/08	1996 OWS List; OWS List 1/1/08
EDC-9	23	Car wash	12/17	Modified floor trench for car wash bay	Sanitary	63	Commercial wash	Closed. Removed 1/08	1996 OWS List; OWS List 1/1/08
EDC-14	39	Golf Maintenance	16/19	Steel tank	Storm	5,000	Drainage from parking area north of B39	Active	ECP Report; OWS List 1/1/08; RCRA Partial Closure Report, 2011.

Notes: Table summarizes status of current or former OWSs located in the subject property.

* Current Number/Formal Number

Data current as of January 2012.

TABLE B-8
SUMMARY OF ASBESTOS CONTAINING MATERIAL
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 1 OF 4

Transfer Parcel	Building Number	Building Identification	Construction Date	2005 Inventory Findings - ACM or PACM ⁽¹⁾	2011 Asbestos Containing Building Materials Summary ⁽²⁾
EDC-8	402	Mobile Trailer CPO Mess	2004	Not included in table	Asbestos containing material has been identified in the buildings. The aluminum roof coating contains asbestos, as well as the caulking on the vent pipes and siding panels. Laboratory analysis using PLM indicated that white floor tile was negative but the associated black mastic contains asbestos. However, all floor tiles shall remain suspect until TEM analysis is performed, in accordance with EPA recommendations ⁽³⁾ .
EDC-8	403	Training Classroom	2004	Not included in table	ACM has not been identified in the building. Materials considered suspect by EPA, Maine DEP and OSHA regulations shall be sampled prior to maintenance, construction or demolition, in accordance with EPA recommendations.
EDC-8	628	Administration	1983	Unknown	ACM has been identified. The aluminum roof coating contains asbestos, as well as the caulking on the vent pipes and siding panels. Laboratory analysis using PLM indicated that wallboard, insulation, joint compound and ceiling tile was negative. In 2004, TEM analysis on the tan floor tile, the light green floor tile and the associated mastic with both was negative. Materials considered suspect by EPA, Maine DEP and OSHA regulations should be sampled prior to maintenance, renovation and construction or demolition, in accordance with EPA recommendations.
EDC-8	632	NMCB 27 Storage	2006	New 5/2006	ACM has not been identified in the building. Materials considered suspect by EPA, Maine DEP and OSHA regulations shall be sampled prior to maintenance, construction or demolition, in accordance with EPA recommendations.
EDC-8	637	Administration	1983	Unknown	ACM has been identified. In 1998 an asbestos survey was performed for Operations and Maintenance. Results were positive for asbestos in skim coat on plaster, pipe joint insulation and vinyl floor tile in various locations. Several renovation activities have been performed including abatement of asbestos containing pipe joint insulation and plaster with skim coat. PLM analysis results were negative for asbestos in gypsum board, joint compound, straight pipe insulation and rough plaster. Roof tar, felts and tar paper was analyzed by PLM with negative results. However, until roofing materials are analyzed by TEM, they remain suspect in accordance with EPA recommendations. Sampling and analysis of exterior window and door caulking in 2002 tested positive for asbestos.

TABLE B-8
SUMMARY OF ASBESTOS CONTAINING MATERIAL
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 2 OF 4

Transfer Parcel	Building Number	Building Identification	Construction Date	2005 Inventory Findings - ACM or PACM ⁽¹⁾	2011 Asbestos Containing Building Materials Summary ⁽²⁾
EDC-9	11	Navy Exchange Retail Complex	1981	Transite ext., floor mastic, sink coating, floor tile.	ACM has been identified. In 1998 an asbestos survey was performed for Operations and Maintenance. PLM analysis results indicate that there is dark brown smooth asbestos containing transite material located in soffit, fascia and penthouse exterior walls. The main exterior walls consist of ACM transite board with a trowelled on textured stone surface. Sinks have ACM coating. Floor tile in various locations contain asbestos. The floor tile in the main store tested negative by TEM but the mastic remains suspect. Multiple areas of floor tile exist in the mini-mart portion of the building. The top layer of floor tile was analyzed by TEM and found negative but the floor tile underneath contains asbestos. Several renovation activities have been performed including abatement of asbestos containing floor tile and caulking. Materials considered suspect by EPA, Maine DEP and OSHA regulations should be sampled and analyzed prior to maintenance and repair, renovation or demolition activities, in accordance with EPA recommendations.
EDC-9	23	Car Wash	1994	No known ACM	An asbestos survey performed in June 1998 identified two suspect building materials: gypsum board and joint compound. PLM analysis results of both materials were negative for asbestos.
EDC-9	31	Navy Lodge	1999	No known ACM	ACM has not been identified. Analysis has not been performed on building materials such as floor tile and mastic, joint compound, roofing sealant or window caulking, to date. Many of these materials continue to be manufactured containing asbestos. Materials considered suspect by EPA, Maine DEP and OSHA regulations should be sampled and analyzed prior to maintenance, renovation and demolition activities, in accordance with EPA recommendations.
EDC-9	583	Bowling Center/Recreation Mall	1965	No known ACM, renovated	ACM has been identified in the building. PLM analysis performed on gypsum board, ceiling tile and pipe joint insulation were negative. Analysis on various floor tiles (beige, brown and white with black streaks) and associated mastic were positive by PLM. Major renovations have been conducted in the building, including abatement and replacement of some floor tiles and mastic. The new floor tile and associated mastic (beige, green, purple) in the food court area was analyzed by TEM with negative results. Materials considered suspect by EPA, Maine DEP and OSHA regulations shall be sampled prior to maintenance, construction or demolition, in accordance with EPA recommendations.
EDC-9	585	Chapel	1965	VFT, Mastic, Transite, Acoustical Tile, Window Glazing, Door Caulk	ACM has been identified in building 585. Laboratory analysis using PLM indicates that spray on insulation containing asbestos remains in some areas of the older part of the building. During renovations (1999) and roof repairs some asbestos insulation was abated, as necessary. However, there may be remaining insulation found along purloins and areas of the building frame behind fiberglass insulation and sheetrock. Building materials installed during the 1999 renovation have not been surveyed. Materials considered suspect by EPA, Maine DEP and OSHA should be sampled and analyzed prior to maintenance, renovation and/or demolition activities.

TABLE B-8
SUMMARY OF ASBESTOS CONTAINING MATERIAL
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 3 OF 4

Transfer Parcel	Building Number	Building Identification	Construction Date	2005 Inventory Findings - ACM or PACM ⁽¹⁾	2011 Asbestos Containing Building Materials Summary ⁽²⁾
EDC-10	87	Anti Submarine Warfare Operations Center (ASWOC)	1988	No known ACM	Laboratory analysis using PLM indicates that gypsum board, ceiling tile, vinyl tile and mastic throughout the building does not contain asbestos. Carpet mastic, vinyl tile and associate mastic was analyzed by TEM with negative results. The roof is rubber membrane. No ACM identified in 2010 reinspection.
EDC-10	594	Former Air Operations Radar Tower/Mechanical Room	1950	No known ACM	No ACM identified in 1998 survey. During a 2010 re-inspection suspect materials were submitted for analysis. All of these materials were negative for the presence of asbestos, except a layer of silver black material used as a roof undercoating on Building 594 that contains 2.5% chrysotile asbestos. The Building 594 roof has approximately 450 square feet of surface area and this material is thought to cover its entirety. The roof appears to be in good condition and does not pose an issue in its current state.
EDC-11	750	Transient Visitors Quarters	2005	No known ACM	ACM has not been identified. Materials considered suspect by EPA, Maine DEP and OSHA regulations shall be sampled prior to maintenance, renovation and/or demolition activities, in accordance with EPA recommendations.
EDC-14	18	Golf Cart Storage	1997	Not included in table	ACM has not been identified. Analysis has not been performed on suspect building materials such as asphalt shingles and tar paper. However, these materials continue to be manufactured containing asbestos. Therefore, materials considered suspect by EPA, Maine DEP and OSHA regulations should be sampled and analyzed prior to maintenance, repair, renovation or demolition activities, in accordance with EPA recommendations.

TABLE B-8
SUMMARY OF ASBESTOS CONTAINING MATERIAL
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 4 OF 4

Transfer Parcel	Building Number	Building Identification	Construction Date	2005 Inventory Findings - ACM or PACM ⁽¹⁾	2011 Asbestos Containing Building Materials Summary ⁽²⁾
EDC-14	22	Golf Maintenance Building Awning	1990s	Not included in table	No summary prepared. This an awning over a concrete slab attached to B39.
EDC-14	34	Golf Shed	Unknown	Not included in table	ACM has not been identified. Materials considered suspect by EPA, Maine DEP and OSHA regulations shall be sampled prior to maintenance, construction or demolition, in accordance with EPA recommendations.
EDC-14	39	Golf Maintenance Building	1985	PACM roofing	ACM has not been identified. PLM analysis has been performed on suspect building materials such as asphalt shingles and tar paper with negative results. However, asphalt shingles and tar paper shall remain suspect until TEM analysis has been performed, in accordance with EPA recommendations.
EDC-14	78	Golf Clubhouse	1981	Tar at roof vents	ACM has been identified. PLM analysis has been performed on suspect building materials such as smooth gypsum board, textured gypsum board, joint compound, asphalt shingles and tar paper with negative results. In addition, asphalt shingles and tar paper samples were analyzed by TEM with negative results. However, the samples of vent sealant from both the round and the square roof vents were analyzed by TEM with positive results for asbestos.
EDC-14	309	Golf Pumpouse	1954	Window caulking, PACM roofing	ACM has been identified. During a 1998 O&M Survey, PLM analysis was performed on window glazing, asphalt shingles and tar paper. The results for the window glazing were positive and the roofing materials were negative. However, until TEM analysis is performed on the roofing materials, they will remain suspect in accordance with EPA recommendations.

Notes:

- (1) From Environmental Condition of Property Report Table 4-13 for the Naval Air Station, Brunswick, Maine, May 2006 as compiled by Carla Sanders, NASB Asbestos Program Manager, 2005.
- (2) Existing Conditions-Lead and Asbestos Containing Building Materials Summaries based on historical files and prepared for individual buildings by Carla Sanders, NASB Asbestos Program Manager in 2010 and 2011.
- (3) EPA recommends that bulk materials found negative for asbestos or less than one percent asbestos by PLM that fall into any of the five dominantly nonfriable categories be analyzed by an additional method such as TEM.
- (4) Tetra Tech. 2010. "RCRA Partial Closure Report for Building 20, Navy College Office, Naval Air Station Brunswick, Maine." October.

ACM = Asbestos Containing Material

PACM = Presumed Asbestos Containing Material

PLM = Polarized Light Microscopy

TEM = Transmission Electron Microscopy

VFT = Vinyl floor tile

TABLE B-9
SUMMARY OF CURRENT AND REMOVED EQUIPMENT CONTAINING DIELECTRIC FLUID
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 1 OF 2

PARCEL ID	BUILDING	DESCRIPTION/LOCATON	STATUS	SERIAL NUMBER	TYPE	CLASS	PCB CONCENTRATION (PPM)	DATE REMOVED OR DISPOSED
MRRA PARCELS EDC-8, EDC-9, EDC-10, EDC-11, EDC-14								
EDC-8	632	PAD (POST 2006)	I	00884P06X80A	TRANSFORMER	NONPCB	NA	NA
EDC-8	637/658	POLE/B-658 RMCB-27	R	6879930	TRANSFORMER	PCB	220**	12/6/1995
EDC-8	None ID'ed	RMCB-27	R	2643-3-2	TRANSFORMER	PCB	1300	7/3/1991
EDC-8	None ID'ed	RMCB-27	R	2643-3-4	TRANSFORMER	PCB	100	7/3/1991
EDC-8	None ID'ed	RMCB-27	R	2643-3-5	TRANSFORMER	PCB	11000	7/3/1991
EDC-8	Open Land	POLE/LIFT STATION - RMCB-27	I	90A341747	TRANSFORMER	NONPCB	<1*	NA
EDC-8	Open Land	POLE/LIFT STATION - RMCB-27	I	90A341748	TRANSFORMER	NONPCB	<1*	NA
EDC-8	Open Land	POLE/LIFT STATION - RMCB-27	I	90A341749	TRANSFORMER	NONPCB	<1*	NA
EDC-9	11	PAD/B-11 NEX	I	866011663	TRANSFORMER	NONPCB	MINERAL OIL**	NA
EDC-9	11	STREETS	I	911057383	TRANSFORMER	NONPCB	<1*	NA
EDC-9	20	PAD/20 POST OFFICE /HOUSING REFERRAL	R	2643-4	TRANSFORMER	PCB	310	12/31/1991
EDC-9	20	B20	I	876000114	TRANSFORMER	NONPCB	MINERAL OIL**	NA
EDC-9	23	POLE/BLDG. 23 CARWASH	I	RT90101860	TRANSFORMER	NONPCB	<1**	NA
EDC-9	31	B-293	I	896003385	TRANSFORMER	NONPCB	MINERAL OIL**	NA
EDC-9	583	PAD/B-583 BOWLING ALLEY	R	876000113	TRANSFORMER	NONPCB	MINERAL OIL**	UNKNOWN
EDC-9	583	PAD/MWR REC MALL	I	0126000377	TRANSFORMER	NONPCB	<1	NA
EDC-9	585	POLE/FITCH AVE-FRONT OF CHAPEL	I	911057382	TRANSFORMER	NONPCB	<1*	NA
EDC-10	87	PAD/B-87 ASWOC	I	866004108	TRANSFORMER	NONPCB	MINERAL OIL**	NA
EDC-10	FORMER 596	TRANSFORMER PAD REMOVED CIRCA 1985 PER DEMO DRAWING CITED IN RCRA PARTIAL CLOSURE CLOSURE REPORT B87.	R	UNKNOWN	TRANSFORMER	UNKNOWN	UNKNOWN	UNKNOWN
EDC-11	750	CURRENT TRANSFORMER, NOT IN DATABASE	I	UNKNOWN	TRANSFORMER	UNKNOWN	UNKNOWN	NA

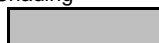
TABLE B-9
SUMMARY OF CURRENT AND REMOVED EQUIPMENT CONTAINING DIELECTRIC FLUID
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE
PAGE 2 OF 2

PARCEL ID	BUILDING	DESCRIPTION/LOCATON	STATUS	SERIAL NUMBER	TYPE	CLASS	PCB CONCENTRATION (PPM)	DATE REMOVED OR DISPOSED
EDC-14	78	POLE/B-78 GUARD SHACK-BACK GATE - CMP OWNED	1	6518373	TRANSFORMER	NONPCB	NA	NA
EDC-14	309	PAD/GOLF CRS PUMP HOUSE	I	71AD3955	TRANSFORMER	NONPCB	<50**	NA
EDC-14	309	PAD/GOLF CRS PUMP HOUSE	I	71AD3953	TRANSFORMER	NONPCB	<50**	NA
EDC-14	309	PAD/GOLF CRS PUMP HOUSE	I	71AD2057	TRANSFORMER	NONPCB	<50**	NA

Notes:

(1) Information provided from NASB Environmental Department PCB Master Inventory (Removed Transformer Database) dated 2/02/2011, which primarily tracked transformers and other equipment (ballasts; switches) removed between 1988 and 1995. Most PCB-containing equipment and PCB-contaminated transformers were removed from NAS Brunswick by October, 23 1995. The database indicates that other equipment, primarily ballasts from unidentified locations were removed between 1996 and 1999. Transformers and other equipment removed and replaced prior to 1989 were not tracked.

(2) Symbols and Shading



Shaded lines indicate known PCB transformers that were removed.

* = Manufacturer information is available

** = NASB Tests/Research/Records

(3) Acronyms

I - Installed/In Service

RMCB - Ready Mobile Construction Battalion

NA - Not Applicable

PCB - Polychlorinated Biphenol

PPM - Parts per million

R - Removed

TABLE B-10
MONITORING WELL LOCATIONS ON TRANSFER PARCELS
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE

Transfer Parcel	Well Identification (1)	Shown on FOST Figure	Easting (2)	Northing (2)	Location
EDC-8	MW-802	Figure B-4	3015336.08	390951.6	West of Site 8
EDC-8	MW-803	Figure B-4	3015489.606	391113.121	Northwest of Site 8
EDC-8	MW-808	Figure B-4	3015384.12	391040.5	West of Site 8
EDC-8	MW-812	Figure B-4	3015316.575	391186.5284	Northwest of Site 8
EDC-8	MW-813	Figure B-4	3015200.346	391133.2207	Northwest of Site 8
EDC-8	MW-814	Figure B-4	3015151.408	391204.0064	Northwest of Site 8
EDC-8	MW-NASB-005	Figure B-4	3015721.19	390664.4	South of Site 8 and Perimeter Road
EDC-8	NASB-BG-MW-801	Figure B-4	3015457.04	390639.08	Southwest of Site 8 and Perimeter Road
EDC-9	MW-NASB-006	Figure B-5	3015960.16	387085.5	Southwest of B23
EDC-10	NASB-B87-MW02S	Figure B-5	3016837.09	387300.11	Northwest of B594 and B87
EDC-10	NASB-B87-MW02D	Figure B-5	3016838.67	387299.72	Northwest of B594 and B87
EDC-10	NASB-B87-MW03	Figure B-5	3016640.36	387039.79	West of B87
EDC-10	NASB-B87-MW04S	Figure B-5	3016827.93	387099.52	North of west wing of B87
EDC-10	NASB-B87-MW04D	Figure B-5	3016827.47	387101.87	North of west wing of B87
EDC-10	NASB-B87-MW05S	Figure B-5	3017074.03	387085.48	East of B87
EDC-10	NASB-B87-MW05D	Figure B-5	3017073.79	387083.45	East of B87
EDC-10	NASB-B87-MW06	Figure B-5	3017004.43	386900.11	South of B87
EDC-10	NASB-B87-MW07	Figure B-5	3017081.83	387318.08	Northeast of B87
EDC-11	NASB-B35-MW01	Figure B-5	3017425.72	386245.08	South of B750
EDC-11	NASB-B35-MW03	Figure B-5	3017592.89	386096.35	South of B750 in parking lot
EDC-14	GOLF-2	Figure B-6	3011457.52	379633.19	North of B78 at golf course

Notes:

(1) Wells as identified in Tetra Tech's database. Presence and condition of wells has not been field verified.

(2) Coordinate System is North American Datum, 1983, State Plane Coordinate System, Maine West (Feet)

EXHIBIT C

CERCLA Hazardous Substance Notice

CERCLA HAZARDOUS SUBSTANCE NOTICE
FOST 2012-1 TRANSFER PARCELS
FORMER NAVAL AIR STATION BRUNSWICK, MAINE

Parcel ID	Location	Substance Name	CAS Registry Number	40 CFR 302.4 Regulatory Synonyms	RCRA Waste Number	Quantity Stored	Date of Storage	Quantity Released	Date of Release	Response
EDC-10	Former Air Force Compound at B87	Trichloroethylene	79-01-6	Trichloroethene	F001	Unknown	1946-1965	Unknown	Unknown	Groundwater Use Restriction
	Former Air Force Compound at B87	Tetrachloroethylene	127184	Tetrachloroethene, Perchloroethylene	F001, F002	Unknown	1946-1965	Unknown	Unknown	Groundwater Use Restriction

NOTE: The table identifies those hazardous substances that it is known, based upon a complete search of agency files, were stored for one year or more in quantities greater than or equal to 1,000 kg (or greater than or equal to 1 kg if designated an acutely hazardous waste under 40 CFR Part 261.30) and/or were released or disposed of on the property to be transferred in quantities greater than or equal to their respective reportable quantities under 40 CFR 302.4. The information in this notice is required under the authority of regulations promulgated under Section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA" or "Superfund"), 42 U.S.C. Section 9620(h).

EXHIBIT D

Notice of Petroleum Products and Derivatives

Notice of Petroleum Products and Derivatives

Notice of the use, storage, and release of petroleum products and derivatives as described in Sections 3.3 and 3.4, and summarized in Table B-4 (Summary of Spills), Table B-5 (Underground Storage Tanks), Table B-6 (Aboveground Storage Tanks), and Table B-7 (Oil Water Separators) of this FOST is provided herein for the MRRA EDC Parcels EDC-8, EDC-9, EDC-10, EDC-11, and EDC-14.

EXHIBIT E

**Asbestos-Containing Materials
Hazard Disclosure and Acknowledgment Form**

**ASBESTOS-CONTAINING MATERIALS
HAZARD DISCLOSURE AND ACKNOWLEDGMENT FORM**

ASBESTOS WARNING STATEMENT

YOU ARE ADVISED THAT CERTAIN BUILDINGS AND UNDERGROUND UTILITIES AT THE FORMER NAVAL AIR STATION BRUNSWICK POTENTIALLY CONTAIN ASBESTOS-CONTAINING MATERIALS. INDIVIDUALS (WORKERS) MAY SUFFER ADVERSE HEALTH EFFECTS AS A RESULT OF INHALATION EXPOSURE TO ASBESTOS. THESE ADVERSE HEALTH EFFECTS INCLUDE ASBESTOSIS (PULMONARY FIBROSIS) AND MESOTHELIOMAS (BENIGN OR MALIGNANT TUMORS).

ACKNOWLEDGMENT

I acknowledge that:

- (1) I have read and understand the above-stated Asbestos Warning Statement.
- (2) I have received from the Government the following document(s): *Finding of Suitability to Transfer, FOST 2012-1, Parcels EDC-8, EDC-9, EDC-10, EDC-11 and EDC-14 (Approximately 211 Acres), Former Naval Air Station Brunswick, Brunswick, Maine* (Department of Navy [DoN] Base Realignment and Closure [BRAC] Program Management Office [PMO] Northeast, 2012); *Final (Revision 2) Environmental Condition of Property Report for the Naval Air Station, Brunswick, Maine* ([DoN BRAC PMO Northeast, 2006); and a *Lead and Asbestos Containing Building Materials Summary* (Sanders, 2011), representing the best information available to the Government as to the presence of and condition of asbestos-containing-materials hazards in the buildings and underground utilities and pipelines covered by this transfer deed.
- (3) I understand that my failure to inspect or to become fully informed of the condition of all or any portion of the property offered will not constitute grounds for any claim or demand for adjustment or withdrawal of any bid or offer made after its opening or tender.
- (4) I understand that, upon execution of this deed transfer, I shall assume full responsibility for preventing future asbestos exposure by properly managing and maintaining or, as required by applicable federal, State, or local laws or regulations, for abating any asbestos hazard in buildings and structures, underground utilities, or fuel pipelines that may pose a risk to human health.

Grantee (or duly authorized agent)

Date

EXHIBIT F

**Lead-Based Paint
Hazard Disclosure and Acknowledgment Form**

**LEAD-BASED PAINT HAZARD
DISCLOSURE AND ACKNOWLEDGMENT FORM**

LEAD WARNING STATEMENT

YOU ARE ADVISED THAT STRUCTURES CONSTRUCTED PRIOR TO 1978 MAY PRESENT EXPOSURE TO LEAD FROM LEAD-BASED PAINT THAT MAY PLACE YOUNG CHILDREN AT RISK OF DEVELOPING LEAD POISONING. LEAD POISONING IN YOUNG CHILDREN MAY PRODUCE PERMANENT NEUROLOGICAL DAMAGE. YOU ARE FURTHER ADVISED THAT LEAD POISONING ALSO POSES A PARTICULAR RISK TO PREGNANT WOMEN. WORKERS MAY ALSO SUFFER ADVERSE HEALTH EFFECTS FROM LEAD DUST AND FUME EXPOSURE.

ACKNOWLEDGMENT

I acknowledge that:

- (1) I have read and understand the above stated Lead Warning Statement;
- (2) I have received from the Federal Government the following document(s): *Finding of Suitability to Transfer, FOST 2012-1, Parcels EDC-8, EDC-9, EDC-10, EDC-11 and EDC-14 (Approximately 211 Acres), Former Naval Air Station Brunswick, Brunswick, Maine* (Department of Navy [DoN] Base Realignment and Closure [BRAC] Program Management Office [PMO] Northeast, 2012), *Final (Revision 2) Environmental Condition of Property Report for the Naval Air Station, Brunswick, Maine* ([DoN BRAC PMO Northeast, 2006), and a *Lead and Asbestos Containing Building Materials Summary* (Sanders, 2011), representing the best information available to the Government as to the presence of Lead-Based Paint and Lead-Based Paint hazards for the buildings covered by this transfer;
- (3) I understand that my failure to inspect, or to become fully informed as to the condition of all or any portion of the property offered will not constitute grounds for any claim or demand for adjustment or withdrawal of any bid or offer made after its opening or tender; and
- (4) I understand that upon execution of this deed transfer, I shall assume full responsibility for preventing future lead exposure by properly managing and maintaining or, as required by applicable Federal, state, or local laws or regulations, for abating any lead-based paint hazard in buildings and structures that may pose a risk to human health.

Grantee (or duly authorized agent)

Date

EXHIBIT G

Environmental Restrictions, Provisions and Conditions

Exhibit G-1

Environmental Restrictions, Provisions and Conditions FOST 2012-1 MRRA EDC Parcels EDC-9, EDC-11 and EDC-14 Former Naval Air Station Brunswick Brunswick, Maine

- 1. Notice of Environmental Condition:** Information concerning the environmental condition of Parcels EDC-9, EDC-11, and EDC-14 (PROPERTY) is contained in the document known as the Finding of Suitability to Transfer (FOST) 2012-1 dated May 2012, which is attached hereto and made a part hereof as Exhibit “_”, the receipt of which is hereby acknowledged by the GRANTEE. An Environmental Condition of Property (ECP) report and other environmental documents are referenced in the FOST; the FOST, ECP and referenced environmental documents describe environmental conditions on the PROPERTY. The FOST sets forth the basis for the GOVERNMENT's determination that the PROPERTY is suitable for transfer. Together, the FOST, ECP and referenced environmental documents contain all pertinent information currently known by GOVERNMENT as to the environmental condition of the PROPERTY. GRANTEE hereby acknowledges that it has been provided copies of the ECP and FOST. The specific environmental conditions described in the FOST and ECP, which are applicable to the PROPERTY, are contained in this Quitclaim Deed.
- 2. CERCLA Covenant:** Pursuant to §120(h)(4)(D)(i) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S.C. §9620(h)(4)(D)(i)), the United States warrants that any response action or corrective action found to be necessary after the date of this deed for contamination existing on the PROPERTY prior to the date of this deed shall be conducted by the United States.
- 3. Reservation of Access as Required by 42 U.S.C. §9620(h)(4)(D)(ii):** The United States retains and reserves a perpetual and assignable easement and right of access on, over, and through the PROPERTY, to enter upon the PROPERTY in any case in which an environmental response or corrective action is found to be necessary on the part of the United States, without regard to whether such environmental response or corrective action is on the PROPERTY or on adjoining nearby lands. Such easement and right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, test pitting, installing monitoring or pumping wells or other treatment facilities, response action, corrective action, or any other action necessary for the United States to meet its responsibilities under applicable laws and as provided for in this instrument. Such easement and right of access shall be binding on the GRANTEE and its successors and assigns and shall run with the land.

In exercising such easement and right of access, the United States shall provide the GRANTEE or its successors or assigns, as the case may be, with reasonable notice of its intent to enter upon the PROPERTY and exercise its rights under this clause, which notice may be severely curtailed or even eliminated in emergency situations. The United States shall use reasonable means to avoid and to minimize interference with the GRANTEE's and the GRANTEE's successors' and assigns' quiet enjoyment of the PROPERTY. At the completion of work, the work site shall be reasonably restored. Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the PROPERTY at a reasonable charge to the United States. Excluding the reasonable charges for such utility services, no fee, charge, or compensation will be due the GRANTEE, nor its successor and assigns, for the exercise of the easement and right of access hereby retained by the United States.

In exercising such easement and right of access, neither the GRANTEE nor its successors and assigns, as the case may be, shall have any claim at law or equity against the United States or any officer, employee, agent, contractor of any tier, or servant of the United States based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this clause; Provided, however, that nothing in this paragraph shall be considered as a waiver by the GRANTEE and its successors and assigns of any remedy available to them under the Federal Tort Claims Act.

- 4. Notice Of Hazardous Substance Activity in accordance with 42 U.S.C. §9620(h)(3)(A)(i):** Pursuant to 40 C.F.R. 373.2 and §120(h)(3)(A)(i) of CERCLA (42 U.S.C. §9620(h)(3)(A)(i)), and based upon a complete search of agency files, the United States gives notice that no hazardous substances have been released or disposed of or stored for one year or more on the PROPERTY.
- 5. Federal Facility Agreement:** The former Naval Air Station Brunswick (Main Base) has been identified as a National Priorities List (NPL) Site under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) of 1980, as amended. The transfer deed, as it currently exists or may be amended, shall not affect the rights and obligations of parties under the Federal Facility Agreement ([FFA] DoN, USEPA, State of Maine, 1990). The FFA Section VIII requires that the Navy ensure that any transactions involving interest or right in real

property do not impede or impair activities or response actions taken pursuant to the FFA. Therefore, the Navy has provided and the GRANTEE will acknowledge it has received a copy of the FFA through execution of the deed. The Navy will ensure that provisions in the transfer deed address the rights of Navy and regulatory agencies to access the PROPERTY to conduct environmental studies and investigations and to carry out environmental responses as necessary; contain provisions relating to compliance with applicable health and safety plans; and for operation of any response actions.

6. **Access to Property by State of Maine:** Pursuant to Maine law (Maine Revised Statutes Title 38 [38 M.R.S. Chapter 3, §548; 38 M.R.S. Chapter 13 §1318-B; and 38 M.R.S Chapter 13 §1361 et seq]), GRANTEE agrees on behalf of itself, its successors and assigns as a covenant running with the land, that the State of Maine, or its officers, agents, employees, contractors and subcontractors (the "State"), shall have the right to enter upon the Property to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, testpitting, installing monitoring or pumping wells or other treatment or containment facilities if corrective or remedial action is found by the State to be necessary or advisable after the date of transfer and that GRANTEE shall allow the State to enter upon the Property for such purposes following reasonable notice. The State agrees to use reasonable means to avoid or minimize interference with GRANTEE'S or GRANTEES' successors' and assigns' quiet enjoyment of the Property so as not to unreasonably interfere with GRANTEES and the GRANTEES successors' and assigns' operations on the Property. GRANTEE and all successive owners of the Property or any portion thereof, and their assigns, are hereby bound by such covenants for the benefit of the State as the covenantees.
7. **Reuse Restriction:** The GRANTEE, its successors, and assigns agree that residential reuse of Parcel EDC-14 is prohibited, including long-term elder care facilities, child day care, pre-school, child playground or any other similar child occupied facility or activity.
8. **Groundwater Use Restriction:** The GRANTEE, its successors, and assigns agree that no groundwater extraction/production supply wells shall be installed or permitted, and that no access to groundwater for dewatering or other purposes shall be permitted on the PROPERTY without the prior written approval of the Navy and the applicable federal and state regulatory agencies, as appropriate.

A public water supply well (PWS ID94492101) at the golf course club house in Parcel EDC-14 is exempt from this restriction. Likewise, current surface water withdrawals from the golf course irrigation pond in EDC-14 are exempt from this restriction. Increased water withdrawal from the public water supply well or irrigation pond for other uses, including expansion of the golf course,

golf course club house and/or restaurant uses, must be approved in advance by the Navy and applicable regulatory agencies.

9. Discovery of Previously Unknown Contamination: The GRANTEE, its successors and assigns, or their subcontractors, shall stop all work and notify the Navy immediately if previously unknown contamination, such as, but without limitation, buried debris, stained soil, unusual odors, is discovered during soil disturbing activity such as soil excavation, drilling, digging or other ground-disturbing activities, including disturbance of building slabs, roads and other structures and paved areas.

10. Presence of Asbestos: The GRANTEE, its successors, and assigns, covenant and agree that they will comply with all federal, state and local laws relating to ACM in their use of any buildings and structures included in this transfer (including demolition and disposal of underground utilities and pipelines that may contain ACM wrapping). The GRANTOR assumes no new or further liability as a result of this transfer than it would otherwise have for losses, judgments, claims, demands or expenses, or damages of whatever nature or kind from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with ACM from buildings, structures, and underground utilities and pipelines included in this transfer. Due to the known or potential presence of undiscovered ACM associated with underground utilities and pipelines, including the abandoned-in-place Casco Bay aviation fuel pipeline which has a fire resistant asbestos wrapping, any subsurface work performed by the GRANTEE must be conducted in accordance with applicable regulations and conducted by trained, properly-equipped personnel. Buildings and structures included in this transfer will be transferred “as is” and asbestos hazards in said buildings and underground utilities and pipelines will become the responsibility of the GRANTEE. The GRANTEE will be required to sign the Asbestos Hazard Disclosure and Acknowledgment Form included as Exhibit E of the FOST prior to execution of the transfer deed.

11. Presence of Lead-Based Paint: The GRANTEE, its successors, and assigns agree that they will comply with all federal, state, and local laws relating to LBP in their use of any buildings and structures on the PROPERTY (including demolition and disposal of existing improvements). The GRANTOR assumes no new or further liability as a result of this transfer than it would otherwise have for losses, judgments, claims, demands, expenses, or damages of whatever nature or kind from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with LBP from buildings or structures on the PROPERTY. Buildings will be transferred “as is” and LBP hazards in said buildings will become the responsibility of the GRANTEE. The GRANTEE will be required to sign the Lead-

based Paint Hazard Disclosure and Acknowledgment Form included as Exhibit F of the FOST prior to execution of the transfer deed.

12. Presence of Polychlorinated Biphenyls in Building Materials: The GRANTEE acknowledges that fluorescent light fixture ballasts in facilities on the PROPERTY may contain PCBs. Prior to beginning any maintenance, alterations, demolition, restoration, or construction work affecting fluorescent light fixtures, the GRANTEE must determine if PCB ballasts are present. If present, PCB ballasts and/or fixtures must be disposed of properly in accordance with all applicable Federal, State, and local laws and regulations. The GRANTEE also acknowledges that buildings constructed or renovated between 1950 and 1978 have the potential to have PCBs contained within caulking, and the PCBs can migrate from the caulk into air, dust and surrounding material, such as wood, bricks and soil. Such materials must be handled, managed and disposed of properly during maintenance and/or renovations by the GRANTEE.

13. Groundwater Monitoring Wells: The GRANTOR reserves for itself an easement to certain areas, more fully described in the deed, and located within Parcels EDC-9, EDC-11, and EDC-14, as shown on Figures B-5 and B-6 and as listed on Table B-10, for (a) the periodic sampling of existing groundwater monitoring wells to satisfy the requirements of the Navy Installation Restoration (IR) and Petroleum Programs and (b) the maintenance or abandonment of the monitoring wells. The GRANTOR shall further have the right, in common with all others entitled thereto, to pass and repass on streets, roadways, and passageways as may exist and as reasonably necessary to install new wells and perform periodic sampling and required maintenance of the existing and any future groundwater monitoring wells on the PROPERTY. The GRANTEE, its successors, and assigns shall be able to use the PROPERTY in any manner that does not relocate or otherwise interfere with the integrity, maintenance or continued usefulness of the monitoring wells, or any part or portion thereof without the prior written consent of the GRANTOR. This restriction will be required for as long as the wells are needed to meet the requirements of the Navy IR and Petroleum Programs. If wells become damaged, they will be replaced by the Navy and the cost will be borne by the GRANTEE or its successors and assigns.

14. Other Land Use Controls: The GRANTEE, its successors, and assigns agree that they will comply with provisions for all existing or future Land Use Controls established for sites as part of CERCLA Records of Decision and Remedial Design documents, or Petroleum Program decision documents.

Exhibit G-2

Environmental Restrictions, Provisions and Conditions FOST 2012-1 MRRA EDC Parcel EDC-8 Former Naval Air Station Brunswick, Maine

- 1. Notice of Environmental Condition:** Information concerning the environmental condition of Parcel EDC-8 (PROPERTY) is contained in the document known as the Finding of Suitability to Transfer (FOST) 2012-1 dated May 2012, which is attached hereto and made a part hereof as Exhibit “_”, the receipt of which is hereby acknowledged by the GRANTEE. An Environmental Condition of Property (ECP) report and other environmental documents are referenced in the FOST; the FOST, ECP and referenced environmental documents describe environmental conditions on the PROPERTY. The FOST sets forth the basis for the GOVERNMENT's determination that the PROPERTY is suitable for transfer. Together, the FOST, ECP and referenced environmental documents contain all pertinent information currently known by GOVERNMENT as to the environmental condition of the PROPERTY. GRANTEE hereby acknowledges that it has been provided copies of the ECP and FOST. The specific environmental conditions described in the FOST and ECP, which are applicable to the PROPERTY, are contained in this Quitclaim Deed.
- 2. Reservation of Access:** The United States retains and reserves a perpetual and assignable easement and right of access on, over, and through the PROPERTY, to enter upon the PROPERTY in any case in which an environmental response or corrective action is found to be necessary on the part of the United States, without regard to whether such environmental response or corrective action is on the PROPERTY or on adjoining nearby lands. Such easement and right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, testpitting, installing monitoring or pumping wells or other treatment facilities, response action, corrective action, or any other action necessary for the United States to meet its responsibilities under applicable laws and as provided for in this instrument. Such easement and right of access shall be binding on the GRANTEE and its successors and assigns and shall run with the land.

In exercising such easement and right of access, the United States shall provide the GRANTEE or its successors or assigns, as the case may be, with reasonable notice of its intent to enter upon the PROPERTY and exercise its rights under this clause, which notice may be severely curtailed or even eliminated in emergency situations. The United States shall use reasonable means to avoid and to minimize interference with the GRANTEE's and the GRANTEE's successors' and assigns' quiet enjoyment of the PROPERTY. At the completion of work, the work

site shall be reasonably restored. Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the PROPERTY at a reasonable charge to the United States. Excluding the reasonable charges for such utility services, no fee, charge, or compensation will be due the GRANTEE, nor its successor and assigns, for the exercise of the easement and right of access hereby retained by the United States.

In exercising such easement and right of access, neither the GRANTEE nor its successors and assigns, as the case may be, shall have any claim at law or equity against the United States or any officer, employee, agent, contractor of any tier, or servant of the United States based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this clause; Provided, however, that nothing in this paragraph shall be considered as a waiver by the GRANTEE and its successors and assigns of any remedy available to them under the Federal Tort Claims Act.

3. **Notice Of Hazardous Substance Activity in Accordance with 42 U.S.C. §9620(h)(3)(A)(i):** Pursuant to 40 C.F.R. 373.2 and Section 120(h)(3)(A)(i) of CERCLA (42 U.S.C. §9620(h)(3)(A)(i)), and based upon a complete search of agency files, the United States gives notice that no hazardous substances have been released or disposed of or stored for one year or more on the PROPERTY.
4. **Federal Facility Agreement:** The former Naval Air Station Brunswick (Main Base) has been identified as a National Priorities List (NPL) Site under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) of 1980, as amended. The transfer deed, as it currently exists or may be amended, shall not affect the rights and obligations of parties under the Federal Facility Agreement ([FFA] DoN, USEPA, State of Maine, 1990). The FFA Section VIII requires that the Navy ensure that any transactions involving interest or right in real property do not impede or impair activities or response actions taken pursuant to the FFA. Therefore, the Navy has provided and the GRANTEE will acknowledge it has received a copy of the FFA through execution of the deed. The Navy will ensure that provisions in the transfer deed address the rights of Navy and regulatory agencies to access the PROPERTY to conduct environmental studies and investigations and to carry out environmental responses as necessary; contain provisions relating to compliance with applicable health and safety plans; and for operation of any response actions.

- 5. Access to Property by State of Maine:** Pursuant to Maine law (Maine Revised Statutes Title 38 [38 M.R.S. Chapter 3, §548; 38 M.R.S. Chapter 13 §1318-B; and 38 M.R.S Chapter 13 §1361 et seq]), GRANTEE agrees on behalf of itself, its successors and assigns as a covenant running with the land, that the State of Maine, or its officers, agents, employees, contractors and subcontractors (the "State"), shall have the right to enter upon the Property to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, testpitting, installing monitoring or pumping wells or other treatment or containment facilities if corrective or remedial action is found by the State to be necessary or advisable after the date of transfer and that GRANTEE shall allow the State to enter upon the Property for such purposes following reasonable notice. The State agrees to use reasonable means to avoid or minimize interference with GRANTEE'S or GRANTEES' successors' and assigns' quiet enjoyment of the Property so as not to unreasonably interfere with GRANTEES and the GRANTEES successors' and assigns' operations on the Property. GRANTEE and all successive owners of the Property or any portion thereof, and their assigns, are hereby bound by such covenants for the benefit of the State as the covenantees.
- 6. Groundwater Use Restriction:** The GRANTEE, its successors, and assigns agree that no groundwater extraction/production supply wells shall be installed or permitted, and that no access to groundwater for dewatering or other purposes shall be permitted on the PROPERTY without the prior written approval of the Navy and the applicable federal and state regulatory agencies, as appropriate.
- 7. Discovery of Previously Unknown Contamination:** The GRANTEE, its successors and assigns, or their subcontractors, shall stop all work and notify the Navy immediately if previously unknown contamination, such as, but without limitation, buried debris, stained soil, unusual odors, is discovered during soil disturbing activity such as soil excavation, drilling, digging or other ground-disturbing activities, including disturbance of building slabs, roads and other structures and paved areas.
- 8. Presence of Asbestos:** The GRANTEE, its successors, and assigns, covenant and agree that they will comply with all federal, state and local laws relating to ACM in their use of any buildings and structures included in this transfer (including demolition and disposal of underground utilities and pipelines that may contain ACM wrapping). The GRANTOR assumes no new or further liability as a result of this transfer than it would otherwise have for losses, judgments, claims, demands or expenses, or damages of whatever nature or kind from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with ACM from buildings, structures, and underground utilities and

pipelines included in this transfer. Due to the potential presence of undiscovered ACM associated with underground utilities and pipelines, any subsurface work performed by the GRANTEE must be conducted in accordance with applicable regulations and conducted by trained, properly-equipped personnel. Buildings included in this transfer will be transferred “as is” and asbestos hazards in said buildings will become the responsibility of the GRANTEE. The GRANTEE will be required to sign the Asbestos Hazard Disclosure and Acknowledgment Form included as Exhibit E of the FOST prior to execution of the transfer deed.

9. Presence of Lead-Based Paint: The GRANTEE, its successors, and assigns agree that they will comply with all federal, state, and local laws relating to LBP in their use of any buildings and structures included in this transfer (including demolition and disposal of existing improvements). The GRANTOR assumes no new or further liability as a result of this transfer than it would otherwise have for losses, judgments, claims, demands, expenses, or damages of whatever nature or kind from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with LBP from buildings or structures on the PROPERTY. Buildings will be transferred “as is” and LBP hazards in said buildings will become the responsibility of the GRANTEE. The GRANTEE will be required to sign the Lead-based Paint Hazard Disclosure and Acknowledgment Form included as Exhibit F of the FOST prior to execution of the transfer deed.

10. Presence of Polychlorinated Biphenyls in Building Materials: The GRANTEE acknowledges that fluorescent light fixture ballasts in facilities on the PROPERTY may contain PCBs. Prior to beginning any maintenance, alterations, demolition, restoration, or construction work affecting fluorescent light fixtures, the GRANTEE must determine if PCB ballasts are present. If present, PCB ballasts and/or fixtures must be disposed of properly in accordance with all applicable Federal, State, and local laws and regulations. The GRANTEE also acknowledges that buildings constructed or renovated between 1950 and 1978 have the potential to have PCBs contained within caulking, and the PCBs can migrate from the caulk into air, dust and surrounding material, such as wood, bricks and soil. Such materials must be handled, managed and disposed of properly during maintenance and/or renovations by the GRANTEE.

11. Groundwater Monitoring Wells: The GRANTOR reserves for itself an easement to certain areas, more fully described in the deed, and located on the PROPERTY, as shown on Figure B-4 and as listed on Table B-10, for (a) the periodic sampling of existing groundwater monitoring wells to satisfy the requirements of the Navy Installation Restoration (IR) and Petroleum Programs and (b) the maintenance or abandonment of the monitoring wells. The GRANTOR shall further have the right, in common with all others entitled thereto, to pass and repass on streets, roadways, and

passageways as may exist and as reasonably necessary to install new wells and perform periodic sampling and required maintenance of the existing and any future groundwater monitoring wells on the PROPERTY. The GRANTEE, its successors, and assigns shall be able to use the PROPERTY in any manner that does not relocate or otherwise interfere with the integrity, maintenance or continued usefulness of the monitoring wells, or any part or portion thereof without the prior written consent of the GRANTOR. This restriction will be required for as long as the wells are needed to meet the requirements of the Navy IR and Petroleum Programs. If wells become damaged, they will be replaced by the Navy and the cost will be borne by the GRANTEE or its successors and assigns.

12. Other Land Use Controls: The GRANTEE, its successors, and assigns agree that they will comply with provisions for all existing or future Land Use Controls established for sites as part of CERCLA Records of Decision and Remedial Design documents, or Petroleum Program decision documents.

Exhibit G-3

Environmental Restrictions, Provisions and Conditions FOST 2012-1 MRRA Parcel EDC-10 Former Naval Air Station Brunswick, Maine

- 1. Notice of Environmental Condition:** Information concerning the environmental condition of Parcel EDC-10 (PROPERTY) is contained in documents known as the Finding of Suitability to Transfer (FOST) 2012-1 dated May 2012, which is attached hereto and made a part hereof as Exhibit “_” and incorporated herein by reference, and the receipt of which is hereby acknowledged by the GRANTEE. An Environmental Condition of Property (ECP) report and other environmental documents are referenced in the FOST; the FOST, ECP and referenced environmental documents describe environmental conditions on the PROPERTY. The FOST sets forth the basis for the GOVERNMENT’s determination that the PROPERTY is suitable for transfer. Together, the FOST, ECP and referenced environmental documents contain all pertinent information currently known by GOVERNMENT as to the environmental condition of the PROPERTY. GRANTEE hereby acknowledges that it has been provided copies of the ECP and FOST. The specific environmental conditions described in the FOST and ECP, which are applicable to the PROPERTY, are contained in this Quitclaim Deed.
- 2. CERCLA Covenants:** Pursuant to §120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(ii) and (B)), the United States warrants that:

 - a) All remedial action necessary to protect human health and the environment with respect to any hazardous substances identified pursuant to §120(h)(3)(A)(i)(I) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 remaining on the PROPERTY has been taken before the date of this deed, and
 - b) Any additional remedial action found to be necessary after the date of this deed shall be performed by the United States.
- 3. Reservation of Access as Required by 42 U.S.C. §9620(h)(3)(A)(iii):** The United States retains and reserves a perpetual and assignable easement and right of access on, over, and through the PROPERTY, to enter upon the PROPERTY in any case in which an environmental response or corrective action is found to be necessary on the part of the United States, without regard to whether such environmental response or corrective action is on the PROPERTY or on

adjoining nearby lands. Such easement and right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, test pitting, installing monitoring or pumping wells or other treatment facilities, response action, corrective action, or any other action necessary for the United States to meet its responsibilities under applicable laws and as provided for in this instrument. Such easement and right of access shall be binding on the GRANTEE and its successors and assigns and shall run with the land.

In exercising such easement and right of access, the United States shall provide the GRANTEE or its successors or assigns, as the case may be, with reasonable notice of its intent to enter upon the PROPERTY and exercise its rights under this clause, which notice may be severely curtailed or even eliminated in emergency situations. The United States shall use reasonable means to avoid and to minimize interference with the GRANTEE's and the GRANTEE's successors' and assigns' quiet enjoyment of the PROPERTY. At the completion of work, the work site shall be reasonably restored. Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the PROPERTY at a reasonable charge to the United States. Excluding the reasonable charges for such utility services, no fee, charge, or compensation will be due the GRANTEE, nor its successor and assigns, for the exercise of the easement and right of access hereby retained by the United States.

In exercising such easement and right of access, neither the GRANTEE nor its successors and assigns, as the case may be, shall have any claim at law or equity against the United States or any officer, employee, agent, contractor of any tier, or servant of the United States based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this clause; Provided, however, that nothing in this paragraph shall be considered as a waiver by the GRANTEE and its successors and assigns of any remedy available to them under the Federal Tort Claims Act.

- 4. Notice Of Hazardous Substance Activity in accordance with 42 U.S.C. §9620(h)(3)(A)(i):**
Exhibit “_” to this Quitclaim Deed provides information as to those hazardous substances which it is known, based upon GOVERNMENT's complete search of its files, were stored for one (1) year or more, or were released or disposed of on the PROPERTY. The information contained in Exhibit “_” is required under 42 U.S.C. §9620(h)(3)(A)(i), and implementing EPA regulations at Title 40, Code of Federal Regulations, Part 373.

- 5. Federal Facility Agreement:** The former Naval Air Station Brunswick (Main Base) has been identified as a National Priorities List (NPL) Site under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) of 1980, as amended. The transfer deed, as it currently exists or may be amended, shall not affect the rights and obligations of parties under the Federal Facility Agreement ([FFA] DoN, USEPA, State of Maine, 1990). The FFA Section VIII requires that the Navy ensure that any transactions involving interest or right in real property do not impede or impair activities or response actions taken pursuant to the FFA. Therefore, the Navy has provided and the GRANTEE will acknowledge it has received a copy of the FFA through execution of the deed. The Navy will ensure that provisions in the transfer deed address the rights of Navy and regulatory agencies to access the PROPERTY to conduct environmental studies and investigations and to carry out environmental responses as necessary; contain provisions relating to compliance with applicable health and safety plans; and for operation of any response actions.
- 6. Access to Property by State of Maine:** Pursuant to Maine law (Maine Revised Statutes Title 38 [38 M.R.S. Chapter 3, §548; 38 M.R.S. Chapter 13 §1318-B; and 38 M.R.S Chapter 13 §1361 et seq]), GRANTEE agrees on behalf of itself, its successors and assigns as a covenant running with the land, that the State of Maine, or its officers, agents, employees, contractors and subcontractors (the "State"), shall have the right to enter upon the Property to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, testpitting, installing monitoring or pumping wells or other treatment or containment facilities if corrective or remedial action is found by the State to be necessary or advisable after the date of transfer and that GRANTEE shall allow the State to enter upon the Property for such purposes following reasonable notice. The State agrees to use reasonable means to avoid or minimize interference with GRANTEE'S or GRANTEES' successors' and assigns' quiet enjoyment of the Property so as not to unreasonably interfere with GRANTEES and the GRANTEES successors' and assigns' operations on the Property. GRANTEE and all successive owners of the Property or any portion thereof, and their assigns, are hereby bound by such covenants for the benefit of the State as the covenantees.
- 7. Reuse Restrictions:** The GRANTEE, its successors, and assigns agree that the reuse of the PROPERTY shall be restricted to commercial/industrial reuse and cannot be used for residential or office scenarios that include long-term elder care facilities, child day care, pre-school, child playground or any other similar child occupied facility or activity. The parcel shall not be used for dwellings of any kind, lodgings, campground, community centers, recreational facilities, stables, farms, or vegetable gardens.

- 8. Groundwater Use Restriction:** The GRANTEE, its successors, and assigns agree that no groundwater extraction/production supply wells shall be installed or permitted, and that no access to groundwater for dewatering or other purposes shall be permitted on the PROPERTY without the prior written approval of the Navy and the applicable federal and state regulatory agencies, as appropriate.
- 9. Discovery of Previously Unknown Contamination:** The GRANTEE, its successors and assigns, or their subcontractors, shall stop all work and notify the Navy immediately if previously unknown contamination, such as, but without limitation, buried debris, stained soil, unusual odors, is discovered during soil disturbing activity such as soil excavation, drilling, digging or other ground-disturbing activities, including disturbance of building slabs, roads and other structures and paved areas.
- 10. Presence of Asbestos:** The GRANTEE, its successors, and assigns, covenant and agree that they will comply with all federal, state and local laws relating to ACM in their use of the building and structures included in this transfer (including demolition and disposal of underground utilities that may contain ACM wrapping). The GRANTOR assumes no new or further liability as a result of this transfer than it would otherwise have for losses, judgments, claims, demands or expenses, or damages of whatever nature or kind from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with ACM from the building, structures, and underground utilities included in this transfer. Due to the potential presence of ACM associated with underground utilities, any invasive work performed by the GRANTEE must be conducted in accordance with applicable regulations and conducted by trained, properly-equipped personnel. The building included in this transfer will be transferred “as is” and asbestos hazards in said building will become the responsibility of the GRANTEE. The GRANTEE will be required to sign the Asbestos Hazard Disclosure and Acknowledgment Form included as Exhibit E of the FOST prior to execution of the transfer deed.
- 11. Presence of Lead-Based Paint:** The GRANTEE, its successors, and assigns agree that they will comply with all federal, state, and local laws relating to LBP in their use of the building and structures included in this transfer (including demolition and disposal of existing improvements). The GRANTOR assumes no new or further liability as a result of this transfer than it would otherwise have for losses, judgments, claims, demands, expenses, or damages of whatever nature or kind from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with LBP from the building or structures included in this transfer. The building included in this transfer will be transferred “as is” and LBP hazards in said building will become the responsibility of the

GRANTEE. The GRANTEE will be required to sign the Lead-based Paint Hazard Disclosure and Acknowledgment Form included as Exhibit F of the FOST prior to execution of the transfer deed.

12. Presence of Polychlorinated Biphenyls in Building Materials: The GRANTEE acknowledges that fluorescent light fixture ballasts in facilities on the PROPERTY may contain PCBs. Prior to beginning any maintenance, alterations, demolition, restoration, or construction work affecting fluorescent light fixtures, the GRANTEE must determine if PCB ballasts are present. If present, PCB ballasts and/or fixtures must be disposed of properly in accordance with all applicable Federal, State, and local laws and regulations. The GRANTEE also acknowledges that buildings constructed or renovated between 1950 and 1978 have the potential to have PCBs contained within caulking, and the PCBs can migrate from the caulk into air, dust and surrounding material, such as wood, bricks and soil. Such materials must be handled, managed and disposed of properly during maintenance and/or renovations by the GRANTEE.

13. Groundwater Monitoring Wells: The GRANTOR reserves for itself an easement to certain areas, more fully described in the deed, and located on the PROPERTY, as shown on Figure B-5 and as listed on Table B-10, for (a) the periodic sampling of existing groundwater monitoring wells to satisfy the requirements of the Navy Installation Restoration (IR) and Petroleum Programs and (b) the maintenance or abandonment of the monitoring wells. The GRANTOR shall further have the right, in common with all others entitled thereto, to pass and repass on streets, roadways, and passageways as may exist and as reasonably necessary to install new wells and perform periodic sampling and required maintenance of the existing and any future groundwater monitoring wells on the PROPERTY. The GRANTEE, its successors, and assigns shall be able to use the PROPERTY in any manner that does not relocate or otherwise interfere with the integrity, maintenance or continued usefulness of the monitoring wells, or any part or portion thereof without the prior written consent of the GRANTOR. This restriction will be required for as long as the wells are needed to meet the requirements of the Navy IR and Petroleum Programs. If wells become damaged, they will be replaced by the Navy and the cost will be borne by the GRANTEE or its successors and assigns.

14. Other Land Use Controls: The GRANTEE, its successors, and assigns agree that they will comply with provisions for all existing or future Land Use Controls established for sites as part of CERCLA Records of Decision and Remedial Design documents or Petroleum Program decision documents.

Exhibit H
Comments and Responses



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

January 20, 2012

Mr. Paul Burgio
Department of Navy
Base Realignment and Closure
Program Management Office-Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Draft Finding of Suitability to Transfer (FOST 2012-1) for Approximately 882 Acres at Naval Air Station Brunswick, ME, November 2011

Dear Mr. Burgio:

Thank you for the opportunity to review the above referenced document. This draft Finding of Suitability to Transfer (FOST) serves as the basis for documenting the Navy's decision that approximately 882 non-contiguous acres of NAS Brunswick land and improvements are suitable to be conveyed from Navy ownership to the Midcoast Regional Redevelopment Authority (MRRA) and the Town of Brunswick as identified in the Final NAS Brunswick Reuse Master Plan. A significant portion of the draft FOST acreage (630 acres) is to be conveyed to the Town of Brunswick for recreational and open space uses. EPA provides the following comments on the draft FOST:

1. **FOST Parcel EDC-8:** EPA requests that soil analytical data, collected at Building 635 as part of the NAS Brunswick RCRA closure process, be provided to us for review. Additional soil sampling may be warranted to confirm that only low concentrations of VOCs exist in soils. A total metals soil sample is also warranted in the vicinity of where sandblasting grit was identified on the ground and analyzed for TCLP. To facilitate timely conveyance of EDC-8, the SeaBee Compound portion of parcel could be exempted from the FOST to allow sufficient time to adequately address these remaining environmental property condition issues.
2. **FOST Parcel EDC-9:** EPA concurs that NAS Brunswick FOST Parcel EDC-9 is suitable to transfer by deed. The Navy will include a CERCLA covenant in the deed warranting that any response action found necessary after the date of transfer will be conducted by the United States. Notifications that asbestos, lead-based paint, and PCBs in building materials do or may exist on the parcel will be included in the deed as well. The Navy will also include a ground water use restriction for the parcel. The Navy will prohibit access to ground water without prior written approval by the

Navy, and other federal and state regulatory agencies, as appropriate.

3. **FOST Parcel EDC-10**: EPA concurs that NAS Brunswick FOST Parcel EDC-10 is suitable to transfer by deed. The Navy will include a CERCLA covenant in the deed warranting that any response action found necessary after the date of transfer will be conducted by the United States. Notifications that asbestos, lead-based paint, and PCBs in building materials do or may exist on the parcel will be included in the deed as well. The Navy will also include restrictions that prohibit access to ground water and limits reuse of the parcel to commercial/industrial uses only.
4. **FOST Parcel EDC-11**: EPA concurs that NAS Brunswick FOST Parcel EDC-11 is suitable to transfer by deed. The Navy will include a CERCLA covenant in the deed warranting that any response action found necessary after the date of transfer will be conducted by the United States. Notifications that asbestos, lead-based paint, and PCBs in building materials do or may exist on the parcel will be included in the deed as well. The Navy will also include a ground water use restriction for the parcel. The Navy will prohibit access to ground water without prior written approval by the Navy, and other federal and state regulatory agencies, as appropriate.
5. **FOST Parcel EDC-13**: EPA cannot concur at this time that FOST Parcel EDC-13 is suitable to transfer by deed. A modification to the Eastern Plume remedy that updates land use/institutional controls (LUC/ICs) to ensure its long-term protectiveness now that NAS Brunswick is closed is necessary before Parcel EDC-13 is conveyed by deed. Updating the LUC/ICs will include establishing the metes and bounds of a ground water use control boundary. Establishment of the ground water use control boundary may encroach on portions of this parcel based upon the current nature and extent of ground water contamination and the necessity to establish an appropriate buffer area around the defined plume. If there is an immediate redevelopment need for this parcel, EPA would support a lease in furtherance of deed conveyance, provided the necessary access provisions and use restrictions are incorporated into any lease agreement.
6. **FOST Parcel EDC-14**: EPA concurs that NAS Brunswick FOST Parcel EDC-14 is suitable to transfer by deed. An existing water supply well currently provides potable water to the golf course clubhouse (Building 78). Surface water is also extracted from a small pond on the golf course for irrigation purposes. Use of the existing water supply well for potable uses along with surface water for irrigation should be allowed to continue as they have not nor are expected to have any future negative impacts to the Eastern Plume remedy. However, any plan to install additional wells to extract ground water for potable or irrigation purposes should be restricted without prior approval by the Navy and the appropriate regulatory agencies. Such approval may be contingent upon the grantee's technical demonstration that ground water extraction will not have a deleterious impact on the Eastern Plume remedy. Appendix G-1 should be revised accordingly.
7. **FOST Parcel REC-7**: EPA cannot concur at this time that FOST Parcel REC-7 is suitable to transfer by deed. A modification to the Eastern Plume remedy that updates LUC/ICs to ensure its long-term protectiveness now that NAS Brunswick is

closed is necessary before Parcel REC-7 is conveyed by deed. Updating the LUC/ICs will include establishing the metes and bounds of a ground water use control boundary. Establishment of the ground water use control boundary may encroach on portions of this parcel based upon the current nature and extent of ground water contamination and the necessity to establish an appropriate buffer area around the defined plume. Given the significant land area associated with this parcel, a conservative amount of acreage could be "carved out" from the REC-7 parcel and exempted from the FOST until modification of the Eastern Plume remedy's LUC/ICs is completed. This concept was used by the Navy to exempt the Site 12 study area and an associated buffer zone from the REC-7 FOST parcel.

EPA has completed a review of the Town of Brunswick's 9 January 2012 letter to the Navy transmitting its comments on the draft FOST. As part of its ongoing development of a draft Recreation, Trails, and Open Space Management Plan, parcel walkovers were completed by Town officials. Some of these parcel visits identified areas of debris. Some of this debris included discarded 55-gallon drums and 5 gallon pails. For this reason, EPA believes that the Navy should conduct, at a minimum, additional visual site inspections of this parcel to assess whether or not there has been any potential for past hazardous substance releases to the environment. If the extent of this debris is isolated to a limited area of the parcel, this area could also be exempted from the FOST until additional due-diligence environmental property condition surveys/studies are completed.

Should you have any questions with regard to this letter, please feel free to contact me at (617) 918-1386.

Sincerely,



Michael J. Daly
Remedial Project Manager
Federal Facilities Superfund Section

cc: Todd Bober, USN-PMO e-mail only (todd.bober@navy.mil)
Robert Leclerc, NAS Brunswick CSO, e-mail only (robert.leclerc@navy.mil)
Claudia Sait, MEDEP e-mail only (claudia.b.sait@maine.gov)
Ted Wolfe, MEDEP e-mail only (theodore.e.wolfe@maine.gov)
Denise Clavette, Town of Brunswick e-mail only (dclavette@brunswickme.org)
Tom Brubaker, MRRA e-mail only (tomb@mrta.us)
Jane Connet, TetraTech e-mail only (jane.connet@tetrattech.com)
Bryan Olson, USEPA Region I e-mail only (olson.bryan@epa.gov)
Ed Benedikt, BACSE

**Response to USEPA Comments Dated January 20, 2012
On the Draft Finding of Suitability to Transfer (FOST) 2012-1
Former Naval Air Station Brunswick, Brunswick, Maine**

Comment 1. FOST Parcel EDC-8: EPA requests that soil analytical data, collected at Building 635 as part of the NAS Brunswick RCRA closure process, be provided to us for review. Additional soil sampling may be warranted to confirm that only low concentrations of VOCs exist in soils. A total metals soil sample is also warranted in the vicinity of where sandblasting grit was identified on the ground and analyzed for TCLP. To facilitate timely conveyance of EDC-8, the SeaBee Compound portion of parcel could be exempted from the FOST to allow sufficient time to adequately address these remaining environmental property condition issues.

Response: Pending further evaluation/investigation of buildings and land areas within the SeaBee compound, that area has been removed from Parcel EDC-8 and FOST 2012-1.

Comment 2. FOST Parcel EDC-9: EPA concurs that NAS Brunswick FOST Parcel EDC-9 is suitable to transfer by deed. The Navy will include a CERCLA covenant in the deed warranting that any response action found necessary after the date of transfer will be conducted by the United States. Notifications that asbestos, lead-based paint and PCBs in building materials do or may exist on the parcel will be included in the deed as well. The Navy will also include a ground water use restriction for the parcel. The Navy will prohibit access to ground water without prior written approval by the Navy, and other federal and state regulatory agencies, as appropriate.

Response: No hazardous substances are known to have been released or disposed of in excess of their respective threshold quantities on Parcel EDC-9. Thus, the transfer deed will not require the Title 42, U.S.C., Section 9620(h)(3)(A)(ii) covenant. Petroleum products or their derivatives have been released on this parcel, therefore, the Title 42, U.S.C., Section 9620(h)(4)(D)(i) covenant is not applicable.

Comment 3. FOST Parcel EDC-10: EPA concurs that NAS Brunswick FOST Parcel EDC-10 is suitable to transfer by deed. The Navy will include a CERCLA covenant in the deed warranting that any response action found necessary after the date of transfer will be conducted by the United States. Notifications that asbestos, lead-based paint and PCBs in building materials do or may exist on the parcel will be included in the deed as well. The Navy will also include restrictions that prohibit access to ground water and limits reuse of the parcel to commercial/industrial uses only.

Response: Comment noted.

Comment 4. FOST Parcel EDC-11: EPA concurs that NAS Brunswick FOST Parcel EDC-11 is suitable to transfer by deed. The Navy will include a CERCLA covenant in the deed warranting that any response action found necessary after the date of transfer will be conducted by the United States. Notifications that asbestos, lead-based paint and PCBs in building materials do or may exist on the parcel will be included in the deed as well. The Navy will also include a ground water use restriction for the parcel. The Navy will prohibit access to ground water without prior written approval by the Navy, and other federal and state regulatory agencies, as appropriate.

Response: Comment noted.

Comment 5. FOST Parcel EDC-13: EPA cannot concur at this time that FOST Parcel EDC-13 is suitable to transfer by deed. A modification to the Eastern Plume remedy that updates land use/institutional controls (LUC/ICs) to ensure its long-term protectiveness now that NAS Brunswick is closed is necessary before Parcel EDC13 is conveyed by deed. Updating the LUC/ICs will include establishing the metes and bounds of a ground water use control boundary. Establishment of the ground water use control boundary may encroach on portions of this parcel based upon the current nature and extent of ground water contamination and the necessity to establish an appropriate buffer

area around the defined plume. If there is an immediate redevelopment need for this parcel, EPA would support a lease in furtherance of deed conveyance, provided the necessary access provisions and use restrictions are incorporated into any lease agreement.

Response: Pending an update of the Land Use Controls associated with the Eastern Plume including establishment of metes and bounds of a groundwater use control boundary, Parcels REC-7 and EDC-13 have been removed from FOST 2012-1.

Comment 6. FOST Parcel EDC-14: EPA concurs that NAS Brunswick FOST Parcel EDC-14 is suitable to transfer by deed. An existing water supply well currently provides potable water to the golf course clubhouse (Building 78). Surface water is also extracted from a small pond on the golf course for irrigation purposes. Use of the existing water supply well for potable uses along with surface water for irrigation should be allowed to continue as they have not nor are expected to have any future negative impacts to the Eastern Plume remedy. However, any plan to install additional wells to extract ground water for potable or irrigation purposes should be restricted without prior approval by the Navy and the appropriate regulatory agencies. Such approval may be contingent upon the grantee's technical demonstration that ground water extraction will not have a deleterious impact on the Eastern Plume remedy. Appendix G-1 should be revised accordingly.

Response: The Navy agrees that the current consumption level at the potable water supply well at the golf course clubhouse should be exempt from this restriction and established as a baseline extraction level. Exhibit G for Parcel EDC-14 has been revised as follows: "A public water supply well (PWS ID94492101) at the golf course club house in Parcel EDC-14 is exempt from this restriction. Only an increase above the current level of potable water consumption (for club house and restaurant uses) will need to be approved by the Navy and applicable regulatory agencies. Likewise, current surface water withdrawals from the golf course irrigation pond are exempt from this restriction and only an increase above the current extraction level (for irrigation of a 9-hole golf course and driving range) will need to be approved by the Navy and applicable regulatory agencies."

Comment 7. FOST Parcel REC-7: EPA cannot concur at this time that FOST Parcel REC-7 is suitable to transfer by deed. A modification to the Eastern Plume remedy that updates LUC/ICs to ensure its long-term protectiveness now that NAS Brunswick is closed is necessary before Parcel REC-7 is conveyed by deed. Updating the LUC/ICs will include establishing the metes and bounds of a ground water use control boundary. Establishment of the ground water use control boundary may encroach on portions of this parcel based upon the current nature and extent of ground water contamination and the necessity to establish an appropriate buffer area around the defined plume. Given the significant land area associated with this parcel, a conservative amount of acreage could be "carved out" from the REC-7 parcel and exempted from the FOST until modification of the Eastern Plume remedy's LUC/ICs is completed. This concept was used by the Navy to exempt the Site 12 study area and an associated buffer zone from the REC-7 FOST parcel.

Response: Pending an update of the Land Use Controls associated with the Eastern Plume including establishment of metes and bounds of a groundwater use control boundary, Parcels REC-7 and EDC-13 have been removed from FOST 2012-1.

EPA has completed a review of the Town of Brunswick's 9 January 2012 letter to the Navy transmitting its comments on the draft FOST. As part of its ongoing development of a draft Recreation, Trails, and Open Space Management Plan, parcel walkovers were completed by Town officials. Some of these parcel visits identified areas of debris. Some of this debris included discarded 55-gallon drums and 5 gallon pails. For this reason, EPA believes that the Navy should conduct, at a minimum, additional visual site inspections of this parcel to assess whether or not there has been any potential for past hazardous substance releases to the environment. If the extent of this debris is isolated to a limited area of the parcel, this area could also be exempted from the FOST until additional due-diligence environmental property condition surveys/studies are completed.

Response: Parcel REC-7 has been removed from FOST 2012-1 until an additional visual site inspection can be completed this spring.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

March 1, 2012

Mr. Paul Burgio
Department of Navy
Base Realignment and Closure
Program Management Office-Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

**Re: Finding of Suitability to Transfer (FOST 2012-1) for Approximately 211 Acres
at the Former Naval Air Station Brunswick, ME, February 2012**

Dear Mr. Burgio:

EPA has completed its review of the above referenced document. This Finding of Suitability to Transfer (FOST) serves as the basis for documenting the Navy's decision that approximately 211 acres of NAS Brunswick land and improvements are suitable to be conveyed from Navy ownership to the Midcoast Regional Redevelopment Authority (MRRA) as identified in the Final NAS Brunswick Reuse Master Plan.

Based on a review of the FOST and without any independent investigations or verification of the information outlined therein, EPA finds that the information presented in the document is sufficient to support this property conveyance, consistent with Department of Defense (DOD) policy.

EPA reserves all rights and authorities relating to information not contained in the FOST whether or not such information was known when the FOST was issued or is discovered after such issuance.

Please note that EPA reviewed this document solely for the purpose of determining whether it meets the requirements of DOD policy. EPA has not reviewed the document for any other purpose, including compliance with the National Environmental Policy Act.

Should you have any questions with regard to this letter, please feel free to contact me at (617) 918-1386.

Sincerely,



Michael J. Daly
Remedial Project Manager
Federal Facilities Superfund Section

cc: Bryan Olson, EPA Region I e-mail only (olson.bryan@epa.gov)
Ted Wolfe, ME DEP e-mail only (Theodore.E.Wolfe@maine.gov)
Claudia Sait, ME DEP e-mail only (claudia.b.sait@maine.gov)
Steve Levesque, MRRA e-mail only (stevel@mrta.us)
Denise Clavette, Town of Brunswick e-mail only (dclavette@brunswickme.org)
Tom Brubaker, MRRA e-mail only (tomb@mrta.us)
Todd Bober, USN-PMO e-mail only (todd.bober@navy.mil)
Robert Leclerc, USN-Brunswick CSO e-mail only (robert.leclerc@navy.mil)
Jane Connet, TetraTech e-mail only (Jane.Connet@tetrattech.com)
Ed Benedikt, BACSE



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

January 10, 2012

Mr. Paul Burgio
OASN (EI&E), BRAC PMO NE
Building 679, Naval Business Center
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Finding of Suitability to Transfer (FOST) 2012-1
Former Naval Air Station, Brunswick, Maine

Dear Mr. Burgio:

The Maine Department of Environmental Protection (MEDEP) has reviewed the draft "Finding of Suitability to Transfer, FOST 2012-1, Parcels EDC-8, EDC-9, EDC-10, EDC-11, EDC-14, and REC-7", dated November 2011. The Finding of Suitability to Transfer (FOST) 2012-1 consists of 7 parcels totaling approximately 882 acres proposed for transfer under economic development conveyances (EDC) and a public benefit conveyance (PBC). The Town of Brunswick is scheduled to receive one of the parcels totaling about 630 acres for recreation, open space and/or natural areas. The Midcoast Regional Redevelopment Authority (MRRRA) is scheduled to receive the remaining 6 parcels comprising about 251 acres for use as professional offices, business and technology industries, community mixed use, as well as, natural areas and recreation/open space. Based on its review MEDEP has the following comments and issues.

General Comments:

1. Please provide MEDEP with copies of the deed documentation once executed.
2. The Navy references supporting documents that are still in draft form and with outstanding regulatory comments. Whenever possible these supporting documents should be finalized prior to using the data and conclusions to support the FOST. In particular, the Background Study needs to be finalized because it is being used by the Navy routinely and without regard to outstanding regulatory comments. (Also see comments 15# and 16\$ below.)
3. There are a number of monitoring or investigative wells located on various transfer parcels (i.e., EDC 10, 11, 13, 14 and REC 7). EDC 13 and REC 7 have monitoring wells that are part of the monitoring network for the Eastern Plume. In July 2011, MEDEP, EPA and the Navy discussed abandoning some of these wells during a meeting to optimize the Long Term Monitoring Program for the Eastern Plume. It would be helpful if the Navy provided a list of monitoring wells, proposed for abandonment, as well as, investigative wells that are no longer needed and, if possible, abandon these wells prior to transferring the property.
4. It has come to MEDEP's attention that the Navy is performing "housekeeping" activities by removing scattered debris from the Base. MEDEP requests that any 55-gallon drums, 5 gallon pails or other

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

possible sources of hazardous waste that it finds outside of buildings be left in place as it may be necessary to perform sampling to ensure that there were no releases or discharges. Leaving suspect debris in place allows for a more focused sampling. Also, it would be helpful if the Navy kept a record of and marked the location of any suspect debris with flagging or by GPS the locations.

5. Based on the nature of their age and historic use, MEDEP requests that some cursory soil and groundwater samples be taken at Building 44 and 288 and the Sea Bees Compound maintenance buildings, 633, 634, and 635.

Of specific note: the "RCRA Partial Closure Report for NMCB-27/SeaBee Compound Area..." for Building 635 discusses staining outside the building adjacent to the AST, in the gravel parking area and the observation of blasting grit. According to the report, a TCLP analysis was performed on the soils for metals instead of totals so this will need to be revisited. Also VOC soil sampling (0-2' bgs) was performed on another stained area and low level VOCs were detected. Considering the length of time that these buildings have been unused MEDEP is concerned that any VOC detections may be an indication of a more serious release therefore additional sampling is requested in this vicinity also.

Wipe samples inside Building 44 and 288 indicated exceedances of lead, arsenic, and cadmium and Building 44 also exceeded for chromium. While the inside of the bunkers have been cleaned, soil sampling should be performed outside the bunkers and possibly under the concrete floors unless they were original. Would the torpedoes historically stored in bunker 44 have contained Otto Fuel? If so, it may be necessary to consider sampling for it also. Were torpedoes stored in any of the other bunkers on REC 7?

6. It should be made clear in the FOST that for EDC 13 and REC 7 that there is no currently approved Land Use Control boundary (LUC) for the Eastern Plume. The 1992 and 1998 Records of Decision (ROD) did not establish a Land Use Control (LUC) boundary for the Eastern Plume. An Explanation of Significant Difference (ESD) (2000) required the development of the LUCs. LUCs were developed as part of the Base Operating Instructions (2007), however, MEDEP did not approve of the Operating Instructions but agreed to allow them to become interim controls until such time as modeling on the plumes was performed. Since then there has been a lot more data collected and modeling performed including the "Groundwater Modeling Summary Report, Sites 1, 3 and Eastern Plume" (ECC 2009). Therefore a LUC boundary must still be reviewed and approved by the regulatory agencies to meet the requirement of the 2000 ESD. The current LUC for the Eastern Plume within these two parcels as depicted in the Operating Instructions is extremely conservative. (Also see comments 13 and 20 below.)
7. It would also be helpful to include add a figure in the FOST showing the interim LUC boundary for the Eastern Plume.

Specific Comments:

8. Section 2.1, Description: Please add the designation for the acronyms EDC and REC either in the text or the table.
9. Section 2.1.2, Town of Brunswick PBC Parcel: As noted Site 15, the Merriconeag Extension Debris Area, is located within the Town's parcel, and although there is a Consensus Statement regarding no further action during the walkover for the Community Environmental Response Facilitation Act (CERFA) additional debris including at least one 55-gallon drum, was identified. This information is included in the June 2007 CERFA Identification of Uncontaminated Property, Appendix D. Some further investigation will be necessary based on this information.

10. Section 2.2.1, MRRA EDC Parcels, para 3: Please define the acronym, BTI.
11. Section 3.1.1, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA Hazardous Substance Notice para 1: "There is no IR Program site, Area of Concern ... on Parcels EDC-8, EDC-9, EDC-10, EDC-11, or EDC-13."

Depending on the definition of "site", the area south of Gurnett Road and Ordinance Road near Liberty Crossing, may be considered to be part of the Eastern Plume. There are low detections but no recent exceedances in some of the monitoring wells however with the planned shut down of Extraction Well (EW) 1 it is unclear how it may impact the plume. Please provide a brief explanation on how this situation applies under the FOST requirements.

12. Section 3.1.1, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA Responses on MMRA EDC Parcels, para 2: "Trace levels of VOCs including TCE and PCE were detected in 3 of 11 wells at concentrations below drinking water standards and below vapor intrusion standards..."

According to the "Technical Memorandum - Bldg 87 Groundwater Assessment," "...there were a few minor exceedances of minimum screening criteria. In comparison to drinking water criteria, PCE exceeded the Maine MEG of 0.6 µg/l in one sample (1.35 µg/l in B87-MW04S). TCE and/or PCE exceeded the EPA RSLs in two samples, but the concentrations were well below MCLs. The EPA RSL for chloroform was exceeded in one sample, but was well below all other criteria."

So not to provide a false sense of security, it might be better to revise the statement to include specific information to more accurately reflect the exceedances/detections in groundwater. Also please reference the document.

13. Sections 3.1.1, and 3.2.1, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA Responses Not on the MRRA EDC Parcels but Within 200 Feet:

This section describes the CERCLA sites in relationship to the transfer parcels and discusses the existing Land Use Controls. Please revise to reflect the interim status of the current LUCs outlined in the Base Operating Instructions. (Also see comment 6 above.)

14. Sections 3.1.1 and 3.2.1, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA Covenant: "No hazardous substances are known to have been released or disposed of in excess of their respective threshold quantities ..."

Contaminants from the Eastern Plume have migrated into EDC 13 and REC 7. Does this make any difference to the access clause needed?

15. Section 3.1.2, Resource Conservation and Recovery Act (RCRA), para 5: "Arsenic was the only metal detected as concentrations that exceeded its MEDEP RAG in samples collected at the other buildings, but all detected arsenic concentration were below the established arsenic background concentration for the former NASB."

It is inappropriate for the Navy to use the draft Background Study data in this manner as the statistical calculations and when to use mixed soils data are still under discussion between the agencies. Until this is resolved and the Background Study is finalized the Navy must refrain from using it to eliminate potential contaminants of concern. Please remove all references to established background concentrations and review the data again to determine if there is a potential risk from arsenic and other metal based on legitimate screening criteria.

16. Section 3.1.2, Resource Conservation and Recovery Act (RCRA), para 6: “The reported levels of three metals in the sediment sample and duplicate were slightly higher than the associated screening levels and/or background UPLs. Analytical results for the other five RCRA metals were below screening levels and UPLs.

There are no agreed upon background UPLs as EPA has rejected the data from one background collection site therefore the data set for sediment background is incomplete. Also there are still outstanding questions regarding the statistical calculations used to establish the UPLs and the Upper Confidence Limits (UCLs). Therefore, it is inappropriate for the Navy to be using this data to eliminate potential exceedances. Please review the data without using the background UPLs and determine if the metals concentrations pose a risk.

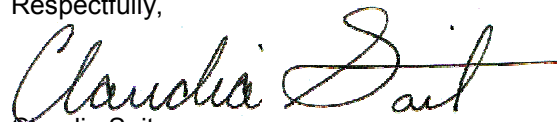
17. Section 3.1.2, Resource Conservation and Recovery Act (RCRA), para 7: According to the RCRA report (RCRA Partial Closure Report for NMCB-27/SeaBee Compound Area...) there was one transformer (ID No. 636.1) near Building 661 was identified as a potential source of PCB contamination. However there was no mention of the area being sampled in the RCRA report. Is this an oversight in reporting or does the Navy need to go back and sample for PCBs at this location?
18. Sections 3.1.3, and 3.2.3, Presence of Petroleum Products and Derivatives: While no known releases were known to have occurred there were a number of leaks found during the removal of the off Base portion of the Casco Bay Pipeline. MEDEP suggests adding language that while there are no known releases, petroleum releases were found during the removal of the Casco Bay Pipeline off Base.
19. Section 3.1.5, Munitions and Explosives of Concern (MEC), para 2: MEDEP would a copy of the UXO specialists' assessment of the munitions item found near Building 309.
20. Section 3.2.1, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA Responses Not on the Town of Brunswick PBC Parcel but Within 200 Feet: “Also, the northeastern part of Parcel REC-7 is within the Eastern Plume Groundwater Restriction Zone, but is not currently impacted by the Eastern Plume. Although these IR sites are not expected to impact the Town of Brunswick PBC Parcel, land use controls (LUCs) will be required to protect the integrity of remedies implemented at the nearby sites and because the parcel lies within LUC zones previously established by CECLA decision documents.”

See comment 6 above.
21. Section 3.2.5, Munitions and Explosives of Concern: There are still concerns about Site 12 and MEDEP recommends a partial fence or barricade to keep the public out of Site 12.
22. Section 3.2.6, Asbestos-Containing Material, para 2: Please check the second sentence for a typographical error.
23. References: The RODs and ESDs for the Eastern Plume need to be added to the references. Also add the NAS Brunswick Instruction 5090.1C since that has the interim LUCs and the Technical Memorandum for Building 87 Groundwater Assessment. Please remove the draft Background Study report since it has not been finalized.
24. Appendix G: Regarding the Presence of Asbestos clause for EDC 11 and 13 and REC 7 MEDEP recommends specifically identifying the Casco Bay Pipeline as containing an asbestos wrapping similar to what is included for Building 20 in Exhibit G-2.

25. Appendix G: Parcels EDC 8, 9, 13 and EDC 10 have Reuse Restrictions in the Environmental Restrictions, Provisions, and Conditions but EDC 11 and 14 and REC 7 do not. The exemption for the use of pesticides and herbicide on Golf Course (EDC 14) seem to make it a likely candidate for reuse restrictions. Please provide a brief explanation as to why these parcels do not have similar restrictions.
26. Appendix G, Exhibit G-1: Groundwater Use Restriction: Does the Navy plan restricting the use of the potable bedrock well at the Golf Course, otherwise an exemption must be made.

Thank you for the opportunity to review this document and please contact me at (207) 287-7713 or claudia.b.sait@maine.gov, if you have any questions or comments.

Respectfully,

A handwritten signature in black ink that reads "Claudia Sait". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

Cf: Electronic Copy

Chris Evans-MEDEP
Todd Bober-BRAC PMO
Steve Gianino -TtNUS
Carol Warren
Suzanne Johnson-BASCE
Denise Clavette-Town of Brunswick
Carolyn Lepage-Lepage Environmental

Robert Leclerc-BNAS
Mike Daly-EPA
David W. Chipman
Tom Brubaker-MMRA
Scott Libby
Ed Benedikt-BACSE

**Response to MEDEP Comments Dated January 10, 2012
On the Draft Finding of Suitability to Transfer (FOST) 2012-1
Former Naval Air Station Brunswick, Brunswick, Maine**

General Comments:

1. Please provide MEDEP with copies of the deed documentation once executed.

Response: Deed documentation will be provided upon execution.

2. The Navy references supporting documents that are still in draft form and with outstanding regulatory comments. Whenever possible these supporting documents should be finalized prior to using the data and conclusions to support the FOST. In particular, the Background Study needs to be finalized because it is being used by the Navy routinely and without regard to outstanding regulatory comments. (Also see comments 15# and 16# below.)

Response: The Navy agrees that whenever possible, the supporting documents should be finalized prior to using the data and conclusions to support the FOST. In this case, the RCRA partial closure reports cited the draft site-specific background values because Navy considered these values to be the best available information at this time. The MEDEP-approved RCRA partial closure reports were consulted in preparation of the FOST because they are the most comprehensive compilations of environmental information available for many of the buildings and land areas on the base.

Because of the desired accelerated transfer schedules, the Navy must sometimes rely on draft and in-progress studies that we expected would be finalized prior to signature of the FOST. When this has not been the case, the Navy has worked with MEDEP and USEPA to resolve concerns or issues. Based on discussions held regarding the background study during a Navy/EPA/MEDEP conference call on January 17, 2012, there will be no change to the background values for soil in the final version of the study. See also responses to Comments 15 and 16.

3. There are a number of monitoring or investigative wells located on various transfer parcels (i.e., EDC 10, 11, 13, 14 and REC 7). EDC 13 and REC 7 have monitoring wells that are part of the monitoring network for the Eastern Plume. In July 2011, MEDEP, EPA and the Navy discussed abandoning some of these wells during a meeting to optimize the Long Term Monitoring Program for the Eastern Plume. It would be helpful if the Navy provided a list of monitoring wells, proposed for abandonment, as well as, investigative wells that are no longer needed and, if possible, abandon these wells prior to transferring the property.

Response: The Navy is developing a list of monitoring wells that could be abandoned because they are no longer needed for their intended purpose. Although it is desirable to decommission wells prior to transfer of the land, these wells can be abandoned after transfer as the Navy retains access rights (See Exhibit G) for purposes that include well abandonment. The Navy will assess the practicality of abandoning wells prior to property transfer in the context of other priorities and funding necessities and will, at a minimum, prioritize abandonment of wells on property that has been transferred or is soon to be transferred.

4. It has come to MEDEP's attention that the Navy is performing "housekeeping" activities by removing scattered debris from the Base. MEDEP requests that any 55-gallon drums, 5 gallon pails or other possible sources of hazardous waste that it finds outside of buildings be left in place as it may be necessary to perform sampling to ensure that there were no releases or discharges. Leaving suspect debris in place allows for a more focused sampling. Also, it would be helpful if the Navy kept a record of and marked the location of any suspect debris with flagging or by GPS the locations.

Response: At this time the Navy CSO is not performing housekeeping activities that include removal of solid waste. However, if in the course of ongoing maintenance and building close-out activities, 55 gallon drums or 5 gallon pails or other potential sources of hazardous substance releases are encountered, they will be flagged, their location noted on a map, and the MEDEP will be notified.

5. Based on the nature of their age and historic use, MEDEP requests that some cursory soil and groundwater samples be taken at Building 44 and 288 and the Sea Bees Compound maintenance buildings, 633, 634, and 635.

Of specific note: the "RCRA Partial Closure Report for NMCB-27/Sea Bee Compound Area..." for Building 635 discusses staining outside the building adjacent to the AST, in the gravel parking area and the observation of blasting grit. According to the report, a TCLP analysis was performed on the soils for metals instead of totals so this will need to be revisited. Also VOC soil sampling (0-2' bgs) was performed on another stained area and low level VOCs were detected. Considering the length of time that these buildings have been unused MEDEP is concerned that any VOC detections may be an indication of a more serious release therefore additional sampling is requested in this vicinity also.

Wipe samples inside Building 44 and 288 indicated exceedances of lead, arsenic, and cadmium and Building 44 also exceeded for chromium. While the inside of the bunkers have been cleaned, soil sampling should be performed outside the bunkers and possibly under the concrete floors unless they were original. Would the torpedoes historically stored in bunker 44 have contained Otto Fuel? If so, it may be necessary to consider sampling for it also. Were torpedoes stored in any of the other bunkers on REC 7?

Response: Buildings 44, 288, and the Sea Bee Compound including Buildings 633, 634 and 635 will not be included in FOST 2012-1 pending further evaluation/investigation to resolve MEDEP concerns expressed in this comment.

6. It should be made clear in the FOST that for EDC 13 and REC 7 that there is no currently approved Land Use Control boundary (LUC) for the Eastern Plume. The 1992 and 1998 Records of Decision (ROD) did not establish a Land Use Control (LUC) boundary for the Eastern Plume. An Explanation of Significant Difference (ESD) (2000) required the development of the LUCs. LUCs were developed as part of the Base Operating Instructions (2007), however, MEDEP did not approve of the Operating Instructions but agreed to allow them to become interim controls until such time as modeling on the plumes was performed. Since then there has been a lot more data collected and modeling performed including the "Groundwater Modeling Summary Report, Sites 1, 3 and Eastern Plume" (ECC 2009). Therefore a LUC boundary must still be reviewed and approved by the regulatory agencies to meet the requirement of the 2000 ESD. The current LUC for the Eastern Plume within these two parcels as depicted in the Operating Instructions is extremely conservative. (Also see comments 13 and 20 below.)

Response: Pending an update of the Land Use Controls associated with the Eastern Plume including establishment of metes and bounds of a groundwater use control boundary, Parcels REC-7 and EDC-13 have been removed from FOST 2012-1.

7. It would also be helpful to include add a figure in the FOST showing the interim LUC boundary for the Eastern Plume.

Response: See response to Comment 6.

Specific Comments:

8. Section 2.1, Description: Please add the designation for the acronyms EDC and REC either in the text or the table.

Response: the definition of acronym EDC is provided in the paragraph preceding the table of Section 2.1 of the FOST. Parcel REC-7 has been removed from the FOST and the text in Section 2.1.

9. Section 2.1.2, Town of Brunswick PBC Parcel: As noted Site 15, the Merriconeag Extension Debris Area, is located within the Town's parcel, and although there is a Consensus Statement regarding no further action during the walkover for the Community Environmental Response Facilitation Act (CERFA) additional debris including at least one 55-gallon drum, was identified. This information is included in the June 2007 CERFA Identification of Uncontaminated Property, Appendix D. Some further investigation will be necessary based on this information.

Response: Parcel REC-7 has been removed from FOST 2012-1 until an additional visual site inspection can be completed this Spring.

10. Section 2.2.1, MRRA EDC Parcels, para 3: Please define the acronym, BTI.

Response: BTI (Business and Technology Industries) is defined in the previous paragraph of Section 2.2.

11. Section 3.1.1, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA Hazardous Substance Notice para 1: "There is no IR Program site, Area of Concern ... on Parcels EDC-8, EDC-9, EDC-10, EDC-11, or EDC-13."

Depending on the definition of "site", the area south of Gurnet Road and Ordinance Road near Liberty Crossing may be considered to be part of the Eastern Plume. There are low detections but no recent exceedances in some of the monitoring wells; however with the planned shutdown of Extraction Well (EW) 1 it is unclear how it may impact the plume. Please provide a brief explanation on how this situation applies under the FOST requirements.

Response: Pending an update of the Land Use Controls associated with the Eastern Plume including establishment of metes and bounds of a groundwater use control boundary, Parcels REC-7 and EDC-13 have been removed from FOST 2012-1.

12. Section 3.1.1, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA Responses on MMRA EDC Parcels, para 2: "Trace levels of VOCs including TCE and PCE were detected in 3 of 11 wells at concentrations below drinking water standards and below vapor intrusion standards..."

According to the "Technical Memorandum – Bldg. 87 Groundwater Assessment, "...there were a few minor exceedances of minimum screening criteria. In comparison to drinking water criteria, PCE exceeded the Maine MEG of 0.6 µg/l in one sample (1.35 µg/l in B87-MW04S). TCE and/or PCE exceeded the EPA RSLs in two samples, but the concentrations were well below MCLs. The EPA RSL for chloroform was exceeded in one sample, but was well below all other criteria."

So not to provide a false sense of security, it might be better to revise the statement to include specific information to more accurately reflect the exceedances/detections in groundwater. Also please reference the document.

Response: The text has been revised to state: "Trace levels of VOCs including TCE and PCE were detected in 3 of 11 wells at concentrations below EPA Maximum Contaminant Levels (MCLs) for drinking

water and vapor intrusion standards for workers. The highest concentration detected was TCE at 2.6 µg/l (MCL = 5 µg/l). PCE exceeded the Maine MEG of 0.6 µg/l in one sample, TCE and/or PCE exceeded their November 2010 EPA Tap Water Regional Screening Levels (RSLs – 2.0 µg/l and 0.11 µg/l, respectively) in two samples, and chloroform exceeded its RSL (0.19 µg/l) in one sample (Tetra Tech, 2011a).”

13. Sections 3.1.1, and 3.2.1, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA Responses Not on the MRRA EDC Parcels but Within 200 Feet:

This section describes the CERCLA sites in relationship to the transfer parcels and discusses the existing Land Use Controls. Please revise to reflect the interim status of the current LUCs outlined in the Base Operating Instructions. (Also see comment 6 above.)

Response: Land Use Controls outlined in the Base Instruction and attached to the ESD for the Eastern Plume (DoN, 2000) identified a groundwater restriction zone that extended well south of Gurnet Road and onto Parcels EDC-13 and 14 and Parcel REC-7. A Technical Memorandum (Tetra Tech, 2012a) was prepared to move the southern LUC boundary of the Eastern Plume to a line approximately 600 feet south of Gurnet Road and at least 400 feet south of any well where the MCLs/MEGs for VOCs in groundwater have been exceeded in the past. Thus the revised LUC boundary for groundwater no longer encroaches onto Parcel EDC-14. LUC impacts to Parcels EDC-13 and REC-7 will be addressed in a future FOST.

14. Sections 3.1.1 and 3.2.1, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA Covenant: “No hazardous substances are known to have been released or disposed of in excess of their respective threshold quantities ...”

Contaminants from the Eastern Plume have migrated into EDC 13 and REC 7. Does this make any difference to the access clause needed?

Response: Pending an update of the Land Use Controls associated with the Eastern Plume including establishment of metes and bounds of a groundwater use control boundary, Parcels REC-7 and EDC-13 have been removed from FOST 2012-1.

15. Section 3.1.2, Resource Conservation and Recovery Act (RCRA), para 5: “Arsenic was the only metal detected as concentrations that exceeded its MEDEP RAG in samples collected at the other buildings, but all detected arsenic concentration were below the established arsenic background concentration for the former NASB.”

It is inappropriate for the Navy to use the draft Background Study data in this manner as the statistical calculations and when to use mixed soils data are still under discussion between the agencies. Until this is resolved and the Background Study is finalized the Navy must refrain from using it to eliminate potential contaminants of concern. Please removal all references to established background concentrations and review the data again to determine if there is a potential risk from arsenic and other metal based on legitimate screening criteria.

Response: The text cited in the comment is summarized from the RCRA Partial Closure report for the NMCB Compound which provides the more detailed information and analysis of the data collected (reference). The Navy has responded to MEDEP comments on the RCRA Partial Closure reports, and all the reports have now been accepted by MEDEP. Many of the reports cite the draft background values. When exceedances of screening criteria occurred in the data sets, the Navy used the best available information and the weight of evidence to support its recommendations, and to identify actual releases of hazardous waste. For background, the draft site-specific background values utilized in the RCRA Partial Closure reports were considered the best available information. Based on a discussion of the background study during the Navy/EPA/MEDEP conference call on January 17, 2012, there will be no change to the background values for soil in the final version of the study.

For this FOST, the words “below the established arsenic background concentration for the former NASB” will be removed, and replaced with “within the range of arsenic concentrations the Navy considers to be consistent with background, based on the Background Study conducted at the former NASB (Tetra Tech, 2012b)).”

Pending further evaluation/investigation of buildings and land areas within the Sea Bee compound, that area has been removed from Parcel EDC-8 and FOST 2012-1.

16. Section 3.1.2, Resource Conservation and Recovery Act (RCRA), para 6: “The reported levels of three metals in the sediment sample and duplicate were slightly higher than the associated screening levels and/or background UPLs. Analytical results for the other five RCRA metals were below screening levels and UPLs.

There are no agreed upon background UPLs as EPA has rejected the data from one background collection site therefore the data set for sediment background is incomplete. Also there are still outstanding questions regarding the statistical calculations used to establish the UPLs and the Upper Confidence Limits (UCLs). Therefore, it is inappropriate for the Navy to be using this data to eliminate potential exceedances. Please review the data without using the background UPLs and determine if the metals concentrations pose a risk.

Response: Building 77 and land areas within Parcel EDC-13 have been removed from FOST 2012-1 pending resolution of issues regarding the Eastern Plume LUC boundary.

17. Section 3.1.2, Resource Conservation and Recovery Act (RCRA), para 7: According to the RCRA report (RCRA Partial Closure Report for NMCB-27/Sea Bee Compound Area...) there was one transformer (ID No. 636.1) near Building 661 was identified as a potential source of PCB contamination. However there was no mention of the area being sampled in the RCRA report. Is this an oversight in reporting or does the Navy need to go back and sample for PCBs at this location?

Response: Because of the sampling requested under Comment 5, [the Sea Bee compound including the transformer location near Building 661](#) is no longer part of this transfer and will be included in a future FOST.

18. Sections 3.1.3, and 3.2.3, Presence of Petroleum Products and Derivatives: While no known releases were known to have occurred, there were a number of leaks found during the removal of the off Base portion of the Casco Bay Pipeline. MEDEP suggests adding language that while there are no known releases, petroleum releases were found during the removal of the Casco Bay Pipeline off Base.

Response: Section 3.3 has been revised as follows: “No releases to the environment associated with the pipeline were known to have occurred on the NASB Main Base where the pipeline remains abandoned-in-place. During removal of seven miles of the pipeline off-base between Mitchell Field and the southern base boundary only two locations were found where jet fuel had leaked to surrounding soil. At both locations the soil was excavated and disposed of off-site and post removal confirmation sampling indicated VPHs and EPHs were not detected or were well below MEDEP remediation guidelines.”

19. Section 3.1.5, Munitions and Explosives of Concern (MEC), para 2: MEDEP would a copy of the UXO specialists’ assessment of the munitions item found near Building 309.

Response: A copy of the “Munitions Response Site Identification and Notification Report” dated November 1, 2011 has been provided to MEDEP. This reference has also been added to Exhibit A and cited in Section 3.5 of the text.

20. Section 3.2.1, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), CERCLA Responses Not on the Town of Brunswick PBC Parcel but Within 200 Feet:
“Also, the northeastern part of Parcel REC-7 is within the Eastern Plume Groundwater Restriction Zone, but is not currently impacted by the Eastern Plume. Although these IR sites are not expected to impact the Town of Brunswick PBC Parcel, land use controls (LUCs) will be required to protect the integrity of remedies implemented at the nearby sites and because the parcel lies within LUC zones previously established by CECLA decision documents.”

See comment 6 above.

Response: Pending an update of the Land Use Controls associated with the Eastern Plume including establishment of metes and bounds of a groundwater use control boundary, Parcels REC-7 and EDC-13 have been removed from FOST 2012-1.

21. Section 3.2.5, Munitions and Explosives of Concern: There are still concerns about Site 12 and MEDEP recommends a partial fence or barricade to keep the public out of Site 12.

Response: The Navy agrees that a fence surrounding the Site 12 investigation area is necessary to keep the public out of this active investigation area. A proposed location for the fence is being prepared by the Navy and will be released to the regulators and the Town when available. However Parcel REC-7, including the land surrounding Site 12, has been removed from FOST 2012-1 pending further evaluation/investigation.

22. Section 3.2.6, Asbestos-Containing Material, para 2: Please check the second sentence for a typographical error.

Response: Section 3.6 has been removed from the FOST because Parcel REC-7 is no longer included in FOST 2012-1.

23: References: The RODs and ESDs for the Eastern Plume need to be added to the references. Also add the NAS Brunswick Instruction 5090.1C since that has the interim LUCs and the Technical Memorandum for Building 87 Groundwater Assessment. Please remove the draft Background Study report since it has not been finalized.

Response: The references for the RODs and ESDs for the Eastern Plume are no longer needed to support the text because Parcels EDC-13 and REC-7 have been removed from the FOST. The reference for the Technical Memorandum for Building 87 Groundwater Assessment was already cited in Exhibit A of the Draft FOST. The background study reference will be updated prior to finalization of the FOST.

24. Appendix G: Regarding the Presence of Asbestos clause for EDC 11 and 13 and REC 7 MEDEP recommends specifically identifying the Casco Bay Pipeline as containing asbestos wrapping similar to what is included for Building 20 in Exhibit G-2.

Response: The following sentence in the applicable Presence of Asbestos clauses in Appendix G has been edited as shown in italics: “Due to the *known or* potential presence of ~~undiscovered~~ ACM associated with underground utilities and pipelines, including *the abandoned-in-place Casco Bay aviation fuel pipeline which has a fire-resistant asbestos wrapping*, any subsurface work performed by the GRANTEE must be conducted in accordance with applicable regulations and conducted by trained, properly-equipped personnel. Buildings and *structures* included in this transfer will be transferred “as is” and asbestos hazards in said buildings and underground utilities and pipelines will become the responsibility of the GRANTEE.”

25. Appendix G: Parcels EDC 8, 9, 13 and EDC 10 have Reuse Restrictions in the Environmental Restrictions, Provisions, and Conditions but EDC 11 and 14 and REC 7 do not. The exemption for the use of pesticides and herbicide on Golf Course (EDC 14) seem to make it a likely candidate for reuse restrictions. Please provide a brief explanation as to why these parcels do not have similar restrictions.

Response: With the removal of Parcel EDC-13 from this FOST, the Reuse Restriction in Appendix G of the Draft FOST now applies only to Parcel EDC-10 based on past use as the former Air Force Compound with multiple former USTs and low level detections of VOCs in groundwater. The Navy does not believe Reuse Restrictions are necessary for Parcel EDC-14 (Golf Course), as pesticides and herbicides were applied for their intended purpose and in accordance with standard golf course practices.

26. Appendix G, Exhibit G-1: Groundwater Use Restriction: Does the Navy plan restricting the use of the potable bedrock well at the Golf Course, otherwise an exemption must be made.

Response: The Navy agrees that the current consumption level at the potable water supply well at the golf course clubhouse should be exempt from this restriction and established as a baseline extraction level. Exhibit G for Parcel EDC-14 has been revised as follows: "A public water supply well (PWS ID94492101) at the golf course club house in Parcel EDC-14 is exempt from this restriction. Only an increase above the current level of potable water consumption (for club house and restaurant uses) will need to be approved by the Navy and applicable regulatory agencies. Likewise, current surface water withdrawals from the golf course irrigation pond in EDC-14 are exempt from this restriction and only an increase above the current extraction level (for irrigation of a 9-hole golf course and driving range) will need to be approved by the Navy and applicable regulatory agencies."

-----Original Message-----

From: Sait, Claudia B [<mailto:Claudia.B.Sait@maine.gov>]

Sent: Thursday, February 23, 2012 14:12

To: Burgio, Paul F CIV NAVFACHQ, BRAC PMO; Mike Daly

Subject: FOST-2012-1 Revised Draft

Paul,

I have reviewed the draft final FOST 2012-2. There a few items that need to be resolved are outlined below.

Per RTC 5 Building 44 was to be removed from the transfer but it was inadvertently left on figure B-5 for EDC 9.

Per RTC 25, MEDEP requested that the reuse of the golf course be restricted due to the use of herbicides and pesticides. The response was that herbicides and pesticides were applied for their intended use and in accordance with standard golf course practice. That may be true but without due diligence which is not required under RCRA because of the exemption for golf courses, it is impossible to determine whether a change in use could have adverse impact on human health. Some of the old obsolete pesticides/herbicides, such as those found at Site 17, could still be in surface soil. The Navy needs to restrict the use of this property similar to that of EDC 10.

It appears that the Reuse Restrictions were inadvertently removed from EDC 8 & 9. Again the restrictions should be similar to those in EDC 10.

Since the Quarry is upgradient of the golf course it would be prudent to sample the bedrock well at the golf course for solvents and perchlorates since those are not required as part of the Drinking Water Program.

Thanks for sending the Munitions Response Site Identification & Notification Report, however the report references two reports, Background Study (Feb 2012) and a Tech Memo on LUC, which MEDEP will need adequate time to review prior to the finalization of the FOST. Please send the RTCs on the Background Study because I believe we have resolved the soils issues and the Tech Memo as soon as you can.

The Groundwater Restriction on EDC 14 (Exhibit G-1) discusses the "current level of potable water consumption" and the "increase above the current extraction level" for the irrigation pond, however there is no reference what those current levels are. Without actual usage, maybe it would be best to tie the use of the well and pond to the current size of the golf course/driving range and club house/restaurant. I will try to get some draft language for you.

Hope this helps,

Claudia Sait
Project Manager
Division of Remediation-Federal Facilities Unit
Department of Environmental Protection
(207) 287-7713

claudia.b.sait@maine.gov

-----Original Message-----

From: Sait, Claudia B [\[mailto:Claudia.B.Sait@maine.gov\]](mailto:Claudia.B.Sait@maine.gov)

Sent: Monday, March 05, 2012 11:49

To: Burgio, Paul F CIV NAVFACHQ, BRAC PMO

Subject: RE: RTC MEDEP comments on the Draft Final Blue FOST 2012-1

Paul,

After our discussion this morning I am okay with RTC 3. I would like to see the language for the golf course (EDC 14), it needs to be restricted to more than just residential. It should be similar to that for EDC 10. Thanks,

Claudia Sait

Project Manager

Division of Remediation-Federal Facilities Unit

Department of Environmental Protection

(207) 287-7713

claudia.b.sait@maine.gov

**Response to MEDEP Comments Dated February 23rd and March 5th, 2012
On the Draft Final Finding of Suitability to Transfer (FOST) 2012-1
Former Naval Air Station Brunswick, Brunswick, Maine**

Comment 1: Per RTC 5 Building 44 was to be removed from the transfer but it was inadvertently left on figure B-5 for EDC 9.

Response: Building 44 was removed from Parcel EDC-9 in the text and tables, however inadvertently was left on the figures. This will be corrected and new figures included in the Final FOST before signature.

Comment 2: Per RTC 25, MEDEP requested that the reuse of the golf course be restricted due to the use of herbicides and pesticides. The response was that herbicides and pesticides were applied for their intended use and in accordance with standard golf course practice. That may be true but without due diligence which is not required under RCRA because of the exemption for golf courses, it is impossible to determine whether a change in use could have adverse impact on human health. Some of the old obsolete pesticides/herbicides, such as those found at Site 17, could still be in surface soil. The Navy needs to restrict the use of this property similar to that of EDC 10.

Response: The golf course is located in an open space/recreation district and thus is not zoned for residential use. The Navy believes that Parcel EDC-14 is suitable for continued use as a golf course and for other recreational uses, as these uses are consistent with past and present uses of the parcel. However, given MEDEP concerns over past pesticide and herbicide use, the Navy will revise Exhibit G to state "The GRANTEE, its successors, and assigns agree that residential reuse of Transfer Parcel EDC-14 is prohibited, including long-term elder care facilities, child day care, pre-school, child playground or any other similar child occupied facility or activity." The reuse restriction for Transfer Parcel EDC 10 was similar, but reflects the more industrial nature of past activities and hazardous substance and petroleum usage on that parcel.

Comment 3: It appears that the Reuse Restrictions were inadvertently removed from EDC 8 & 9. Again the restrictions should be similar to those in EDC 10.

Response: The residential reuse restriction in Exhibit G-2 of the Draft FOST formerly applied only to EDC-13, not to EDC-8 nor EDC-9. The Sea Bee compound portion of EDC-8 has been removed from this FOST due to MEDEP concerns about potential VOC releases at Buildings 633, 634 and 635. There were no releases of hazardous substances on either Parcel EDC-8 or EDC-9 and the Navy does not believe a residential reuse restriction is appropriate for either parcel.

Comment 4: Since the Quarry is up gradient of the golf course it would be prudent to sample the bedrock well at the golf course for solvents and perchlorates since those are not required as part of the Drinking Water Program.

Response: The Navy agrees and will test the potable water well at the golf club house for these constituents.

Comment 5: Thanks for sending the Munitions Response Site Identification & Notification Report, however the report references two reports, Background Study (Feb 2012) and a Tech Memo on LUC, which MEDEP will need adequate time to review prior to the finalization of the FOST. Please send the RTCs on the Background Study because I believe we have resolved the soils issues and the Tech Memo as soon as you can.

Response: The Eastern Plume Tech Memo and the Background Report were both distributed 2/24/12 for regulator review.

Comment 6: The Groundwater Restriction on EDC 14 (Exhibit G-1) discusses the "current level of potable water consumption" and the "increase above the current extraction level" for the irrigation pond, however there is no reference what those current levels are. Without actual usage, maybe it would be best to tie the use of the well and pond to the current size of the golf course/driving range and club house/restaurant. I will try to get some draft language for you.

Response: Lacking any data on the previous extraction levels at the public water well or the irrigation pump house, the Navy will use the following language in Exhibit G-1 of the Final FOST. "A public water supply well (PWS ID94492101) at the golf course club house in Parcel EDC-14 is exempt from this restriction. Likewise, current surface water withdrawals from the golf course irrigation pond in EDC-14 are exempt from this restriction. Increased water withdrawal from the public water supply well or irrigation pond for other uses, including expansion of the golf course, golf course club house and/or restaurant uses, must be approved in advance by the Navy and applicable regulatory agencies."



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

May 22, 2012

Mr. Paul Burgio
OASN (EI&E), BRAC PMO NE
Building 679, Naval Business Center
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Finding of Suitability to Transfer (FOST) 2012-1
EDCs Parcels 8, 9, 10, 11, & 14
Former Naval Air Station, Brunswick, Maine

Dear Mr. Burgio:

The Maine Department of Environmental Protection (MEDEP) has reviewed the final "Finding of Suitability to Transfer, FOST 2012-1, Parcels EDC-8, EDC-9, EDC-10, EDC-11, and EDC-14", dated May 2012. The Finding of Suitability to Transfer (FOST) 2012-1 consists of 5 parcels totaling approximately 211 acres proposed for transfer under economic development conveyances (EDC). The Midcoast Regional Redevelopment Authority (MRRRA) is scheduled to receive the five parcels comprising about 211 acres, which will be used for professional offices, business and technology industries, community mixed use, natural areas and recreation/open space.

Under the FOST environmental restriction, provisions and conditions, the Navy is restricting the use of Transfer Parcel 10 to commercial/industrial reuse and it cannot be used for residential or office scenarios that include long-term elder care facilities, child day care, pre-school, child playground or any similar child occupied facility or activity; and prohibits the use of the parcel for dwellings of any kind, lodgings, campground, community centers, recreation facilities, stable, farms or vegetable gardens. Transfer Parcel 14 use is prohibited from residential reuse including long-term elder care facilities, child day care, pre-school, child playground or any other similar child occupied facility or activity.

As part of the transfer, with the exception of the public water supply well (PWS ID94492101) at the golf course club house, the Navy will prohibit the use of groundwater on all the Transfer Parcels without the approval of the Navy and appropriate state and federal regulatory agencies. Increased withdrawal from either the public water supply well or the irrigation pond at the golf course for other uses, including expansion of the golf course, club house or restaurant is also prohibited without approval.

MEDEP concurs that the FOST meets the requirements of Section 120(h)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for transfer of the parcels included in FOST 2012-1.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

The FOST process is primarily a record search and very little information is available for the 20-30 years that the Base operated prior to environmental regulation. Consequently the lack of reported storage, release or disposal of hazardous substances cited in the FOST may not represent the actual site conditions. If the site has or will be participating in the MEDEP Voluntary Response Action Program (VRAP) pursuant to Title 38 MRSA § 343-E, the protections provided by the VRAP "No Further Action Assurance" letter or the VRAP "Commissioner's Certificate of Completion" are not superseded by anything in this concurrence letter.

Thank you for the opportunity to review this document and please contact me at (207) 287-7713 or claudia.b.sait@maine.gov, if you have any questions or comments.

Respectfully,

A handwritten signature in black ink that reads "Claudia Sait". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

Cf: Electronic Copy

Chris Evans-MEDEP	Robert Leclerc-BNAS
Todd Bober-BRAC PMO	Mike Daly-EPA
Steve Giannino-TtNUS	David W. Chipman
Carol Warren	Tom Brubaker-MMRA
Suzanne Johnson-BASCE	Scott Libby
Denise Clavette-Town of Brunswick	Ed Benedikt-BACSE
Catherine Ferdinand-Bowdoin College	
Carolyn Lepage-Lepage Environmental	

-----Original Message-----

From: Tom Brubaker [\[mailto:tomb@mrta.us\]](mailto:tomb@mrta.us)

Sent: Tuesday, January 10, 2012 16:22

To: Burgio, Paul F CIV NAVFACHQ, BRAC PMO

Cc: Steve Levesque; Jeffrey Jordan

Subject: FOST 2012-1

Paul,

Parcel EDC-14 is the nine-hole golf course. Potable water is provided by a public, domestic water-supply well (PWSID 94492101) near the Clubhouse (Building 78). Exhibit G-1 states for parcel EDC-14 "Groundwater Use Restriction: The GRANTEE, its successors, and assigns agree that no groundwater extraction/production supply wells shall be installed or permitted, without the prior written approval of the Navy and the applicable federal and state regulatory agencies, as appropriate". Will the continued use of this drinking water well to support golf course operations be permitted under this FOST?

The golf course currently draws (or drew) water for irrigation from a pond on the golf course. Draft FOST 2012-1 does not mention the irrigation system for the golf course. Exhibit G-1 states for parcel EDC-14 "Groundwater Use Restriction: The GRANTEE, its successors, and assigns agree that no groundwater extraction/production supply wells shall be installed or permitted, and that no access to groundwater for dewatering or other purposes shall be permitted on the Transfer Parcels without the prior written approval of the Navy and the applicable federal and state regulatory agencies, as appropriate.", but does not include surface water. Will continued use of the surface water from the pond be permitted for golf course irrigation?

Inability to use these two sources of water would likely severely impact our ability to operate the golf course. Please advise. Thank you.

**Response to MRRA Comments Dated January 10, 2012
On the Draft Finding of Suitability to Transfer (FOST) 2012-1
Former Naval Air Station Brunswick, Brunswick, Maine**

- 1.) Parcel EDC-14 is the nine-hole golf course. Potable water is provided by a public, domestic water-supply well (PWSID 94492101) near the Clubhouse (Building 78). Exhibit G-1 states for parcel EDC-14 "Groundwater Use Restriction: The GRANTEE, its successors, and assigns agree that no groundwater extraction/production supply wells shall be installed or permitted without the prior written approval of the Navy and the applicable federal and state regulatory agencies, as appropriate". Will the continued use of this drinking water well to support golf course operations be permitted under this FOST?

Response: The Navy agrees that the current consumption level at the public water supply well (PWSID 94492101) at the golf course club house should be exempt from the groundwater use restriction and established as a baseline extraction level. Exhibit G for Parcel EDC-14 will be revised to note that only extraction above this baseline (club house and restaurant use) will require Navy and regulatory approval.

- 2.) The golf course currently draws (or drew) water for irrigation from a pond on the golf course. Draft FOST 2012-1 does not mention the irrigation system for the golf course. Exhibit G-1 states for parcel EDC-14 "Groundwater Use Restriction: The GRANTEE, its successors, and assigns agree that no groundwater extraction/production supply wells shall be installed or permitted, and that no access to groundwater for dewatering or other purposes shall be permitted on the Transfer Parcels without the prior written approval of the Navy and the applicable federal and state regulatory agencies, as appropriate.", but does not include surface water. Will continued use of the surface water from the pond be permitted for golf course irrigation? Inability to use these two sources of water would likely severely impact our ability to operate the golf course. Please advise. Thank you.

Response: Exhibit G for Parcel EDC-14 will likewise be revised to note that current levels of surface water extraction from the irrigation pond on the golf course will be exempt from the groundwater use restriction and only extraction above this baseline (irrigation of a 9-hole golf course and driving range) will require Navy and regulatory approval.

March 5, 2012

Mr. Paul Burgio
Department of the Navy
Base Realignment and Closure
Program Management Office – Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

RE: FOST 2012-1

Dear Paul:

The Midcoast Regional Redevelopment Authority has reviewed the subject Finding of Suitability to Transfer (FOST 2012-1) and offer the following comments.

Parcel EDC-9 is not receiving a CERCLA covenant. Can you please clarify for us the location and nature of the petroleum (or derivatives) release on this parcel?

Section 3.6 states that asbestos-contaminated soil is present in the crawl space under Building 20. We believe this constitutes a release under CERCLA, the remediation of which the Navy is responsible for. This should be appropriately reflected in the FOST.

Please call me should you have any questions.

Sincerely,


Steven H. Levesque
Executive Director

cc: David Knisely, MRRA Counsel

**Response to MRRA Comments Dated March 5, 2012
On the Draft Final Finding of Suitability to Transfer (FOST) 2012-1
Former Naval Air Station Brunswick, Brunswick, Maine**

Comment 1: Parcel EDC-9 is not receiving a CERCLA covenant. Can you please clarify for us the location and nature of the petroleum release on this parcel?

Response: The RCRA Closure Report for Building 11 showed the NEX Service Station (POL Site 2) petroleum plume as just encroaching upon the southwest corner of Building 11 in Parcel EDC-9. Building 11 is upgradient of the plume and its source (the former NEX USTs) on the adjacent Parcel EDC-21. The plume shown in the RCRA closure report is from a general base wide map of known plumes. However, during our ongoing preparation of the FOST for Parcel EDC-21, we reviewed site-specific reports for POL Site 2 that provide a more precise depiction of the plume, and indicate the plume did not migrate onto Parcel EDC-9. Therefore, there were no known hazardous substance or petroleum releases on the EDC-9 parcel, so the 120(h)(4)(D)(ii) and (D)(iii) covenant and access clauses will be provided for Parcel EDC-9 in the final version of the FOST 2012-1.

Comment 2: Section 3.6 states that asbestos-contaminated soil is present in the crawl space under Building 20. We believe this constitutes a release under CERCLA, the remediation of which the Navy is responsible for.

Response: Building 20 will not be included in FOST 2012-1 pending Navy assessment of asbestos contaminated soil in the crawl space beneath that building.



Town of Brunswick, Maine

INCORPORATED 1739

OFFICE OF THE TOWN MANAGER

GARY L. BROWN, MANAGER

28 FEDERAL STREET
BRUNSWICK, MAINE 04011
TELEPHONE 725-6659
FAX # 725-6663

January 9, 2012

Department of the Navy
BRAC Program Management Office Northeast
BRAC Environmental Coordinator, Paul Burgio
4911 Broad Street
Philadelphia, PA 19112-1303

Dear Paul,

Thank you for the opportunity to provide comments on the Draft Finding of Suitability to Transfer FOST 2012-1, for Parcels EDC-8, EDC-9, EDC-10, EDC-11, EDC-13, EDC-14, and REC-7; dated November 2011.

The Town of Brunswick's comments primarily address REC-7, the Town of Brunswick PBC Parcel located in the Reuse Plan District Natural Areas / Recreation and Open Space. As delineated in your maps B-1, B-2, B-3 and B-6 – the PBC contains approximately 630.07 acres. At this time, we offer the following comments:

1. Section 3.2.2, Resource Conservation and Recovery Act (RCRA)
 - a. The Town of Brunswick has conducted preliminary site walks on Parcel REC-7 to determine location of roads, paths and trails to begin its Draft Recreation, Trails and Open Space Management Plan for the PBC. During the site visits, several areas were discovered that contained debris, old vehicles, drums, wood shelters, tarps and other areas of interest. The Town of Brunswick would like to discuss this further, as these items were not identified in the FOST 2012-1, and indicate the absence of a thorough survey of Parcel REC-7. The Town would like to ensure that this information is reflected in the FOST and would like additional assurances that Parcel REC-7 is free of any potential public health and safety hazards. Photographs of the items described above, taken by Town staff, will be sent under separate cover.
2. Section 3.2.5, Munitions and Explosives of Concern
 - a. See page 18 – 19: Site 12 (Explosive Ordnance Disposal Area) MRP site is surrounded on three sides by Parcel Rec-7. The Town of Brunswick would like to discuss the boundary delineation between Site 12 and the REC-7 PBC. As noted in the FOST 2012-1, there is no road access to the PBC with the existing fence directly along the tree-line. The Town of Brunswick anticipated that the Navy will protect Site 12 be from public access, and requests that the perimeter fence located on the southern boundary of the

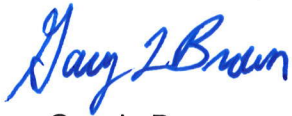
roadway, be removed and relocated on the northern boundary of the roadway, thereby allowing the Town to access the PBC.

3. Exhibit G-1.4, Groundwater Use Restriction

- a. EDC-14: It is noted that an existing well is present, providing a potable water supply for the golf course. As groundwater extraction is environmental restricted (Exhibit G-1) without prior written approval by the Navy and applicable federal and state regulatory agencies, the Town requests current well water consumption for specific uses be established as a baseline. It is further requested that any increase in well water consumption/extraction require further review and approval by the Navy and applicable federal and state regulatory agencies.

We appreciate the opportunity to provide comments. Should you have any questions, please contact me.

Sincerely,



Gary L. Brown
Town Manager

cc: Town Council, Town of Brunswick
Anna Breinich, Director Planning and Development
Tom Farrell, Director Parks and Recreation
Denise Clavette, Special Projects Assistant
Town of Brunswick, Recreation Commission
Town of Brunswick, Conservation Commission
Claudia Sait, Maine DEP
Mike Daly, EPA
Catherine Ferdinand, Bowdoin College
Steve Levesque, MRRA

**Response to Town of Brunswick Comments Dated January 9, 2012
On the Draft Finding of Suitability to Transfer (FOST) 2012-1
Former Naval Air Station Brunswick, Brunswick, Maine**

1. Section 3.2.2, Resource Conservation and Recovery Act (RCRA)
The Town of Brunswick has conducted preliminary site walks on parcel REC-7 to determine location of roads, paths and trails to begin its draft recreation, trails and open space management plan for the PCB. During the site visits several areas were discovered that contained debris, old vehicles, drums, wood shelters, tarps and other areas of interest. The Town of Brunswick would like to discuss this further, as these items were not identified in the FOST 2012-1, and indicate the absence of a thorough survey of Parcel REC-7. The Town would like to ensure that this information is reflected in the FOST and would like additional assurances that Parcel REC-7 is free of any potential public health and safety hazards. Photographs of the items described above, taken by Town staff, will be sent under separate cover.

Response: Parcel REC-7 has been removed from FOST 2012-1 until an additional visual site inspection can be completed this spring.

2. Section 3.2.5, Munitions and Explosives of Concern
See page 18-19: Site 12 (Explosive Ordnance Disposal Area) MRP site is surrounded on three sites by Parcel REC-7. The Town of Brunswick would like to discuss the boundary delineation between Site 12 and the REC-7 PBC. As notes in the FOST 2012-1, there is no road access to the PCB with the existing fence directly along the tree-line. The Town of Brunswick anticipated that the Navy will protect Site 12 be from public access, and requests that the perimeter fence located on the southern boundary of the roadway, be removed and relocated on the northern boundary of the roadway, thereby allowing the Town to access the PCB.

Response: The Navy agrees that a fence surrounding the Site 12 investigation area is necessary to keep the public out of this active investigation area. A proposed location for the fence is being prepared by the Navy and will be released to the regulators and the Town when available. However Parcel REC-7, including the land surrounding Site 12, has been removed from FOST 2012-1 pending further evaluation/investigation.

3. Exhibit G-1.4, Groundwater Use Restriction
EDC-14: It is noted that an existing well is present, providing potable water supply for the golf course. As groundwater extraction is environmental restricted (Exhibit G-1) without prior written approval by the Navy and applicable federal and state regulatory agencies, the Town requests current well water consumption for specific uses be established as a baseline. It is further requested that any increase in well water consumption/extraction require further review and approval by the Navy and applicable federal and state regulatory agencies.

Response: The Navy agrees that the current consumption level at the potable water supply well at the golf course clubhouse should be exempt from this restriction and established as a baseline extraction level. Exhibit G for Parcel EDC-14 has been revised as follows: "A public water supply well (PWS ID94492101) at the golf course club house in Parcel EDC-14 is exempt from this restriction. Only an increase above the current level of potable water consumption (for club house and restaurant uses) will need to be approved by the Navy and applicable regulatory agencies. Likewise, current surface water withdrawals from the golf course irrigation pond are exempt from this restriction and only an increase

above the current extraction level (for irrigation of a 9-hole golf course and driving range) will need to be approved by the Navy and applicable regulatory agencies.”

Brunswick Area Citizens for a Safe Environment
PO Box 245
Brunswick, Maine 04011

January 17, 2012

Mr. Paul Burgio & Mr. Todd Bober
Department of Navy
Base Realignment and Closure PMO-Northeast
Building 679-Naval Business Center, 4911 South Broad Street
Philadelphia, PA 19112-1303

Subject: Former NASB Draft-882 acre FOST 2012-1

Dear Mr. Burgio and Mr. Bober:

BACSE recommendations and comments follow:

I. Section 3.1.5, (Munitions and Explosives of Concern).

Please refer to the MEDEP UXO specialists' assessment of the munitions found near Building 309 and include the report under References.

II. Sections 3.1.1 & 3.2.1, (CERCLA).

The northeastern part of Parcel REC-7 is within the Eastern Plume Groundwater Restriction Zone. Although IR sites are not expected to impact the Town of Brunswick PBC Parcel, LUCs should be required to protect the integrity of remedies implemented at the nearby sites and because the parcel lies within LUC zones previously established by CERCLA decision documents.

Please also note:

1. It should be made clear in the FOST that for the EDC 13 and REC 7 parcels, there is no currently approved Land Use Control (LUC) boundary for the Eastern Plume. The 1992 and 1998 Records of Decision (ROD) did not establish such a boundary for the Eastern Plume.

An "Explanation of Significant Difference" (ESD-2000) was approved that required the development of the LUCs but these were established as "interim" only.

Therefore a LUC boundary should be developed that meets the requirement of the latest ESD.

2. A "Technical Review" committee meeting should be convened to discuss the adequacy of the "interim" LUCs, the long term LUCs needs and the adequacy of the 2007 NASB Instruction 5090.1C in general to define current LUC's for transferred parcels.

III. Missing References:

The RODs and ESDs for the Eastern Plume need to be added.

Technical Memorandum for Building 87 Groundwater Assessment needs to be added.

IV. Additional Appendices

The 2007 NASB Instruction 5090.1C that describes the "interim" LUCs applicable to groundwater should be added as an APPENDIX (rather than listing it as a reference as recommended by MEDEP).

V. BACSE endorses MEDEP comment No.21 regarding Site 12 for restricting public access.

VI. BACSE recommend refining the boundaries shown of the Eastern Plume based on worst-case criteria rather than optimistic projections. (see note #2 under item II above)

VII. BACSE recommend creating a buffer zone around the abandoned Casco Bay Fuel line in case that needs to be excavated or if at some time in the future leakage in soil is discovered.

VIII. BACSE recommends establishing groundwater extraction oversight for the golf course facility to insure that its use for turf watering does not affect contamination remediation up gradient at sites such as the Eastern Plume.

IX. Regarding the use of groundwater as a potable water source at the Golf Course. The State Department of Health must be contacted to insure that State requirements are being met, since their requirements may differ from the Federal requirements currently in place. Clarification is also required as to the status and licensing of any facilities such as snack bars and whether there are existing franchises that are being transferred.

Please do not hesitate to call if you have any questions.

Sincerely,

E.E.Benedikt, President

cc: **E-mail Copy:** BACSE Archives (c/o David W. Chipman)
 BACSE Internal Distribution (c/o Ed Benedikt)
 Curtis Memorial Library – Brunswick NAS Archive
 Mike Daly, Stacy Greendlinger, USEPA
 Lisa Joy, NASB/NAVFAC
 Claudia Sait, MEDEP
 Tom Brubaker, MRRA
 David W. Chipman, Town of Harpswell Representative to the RAB
 Denise Clavette, Town of Brunswick, ME
 Suzanne Johnson, RAB Co-Chair & Town of Brunswick Representative to the RAB
 Scott Libby, Town of Topsham Representative to the RAB
 Jeff Orient, TetraTech
 Carol G. Warren, RAB/BACSE

**Response to BACSE Comments Dated January 17, 2012
On the Draft Finding of Suitability to Transfer (FOST) 2012-1
Former Naval Air Station Brunswick, Brunswick, Maine**

I. Section 3.1.5, (Munitions and Explosives of Concern).

Please refer to the MEDEP UXO specialists' assessment of the munitions found near Building 309 and include the report under References.

Response: This reference has also been added to Exhibit A and cited in Section 3.5 of the text.

II. Sections 3.1.1 & 3.2.1, (CERCLA).

The northeastern part of Parcel REC-7 is within the Eastern Plume Groundwater Restriction Zone. Although IR sites are not expected to impact the Town of Brunswick PBC Parcel, LUCs should be required to protect the integrity of remedies implemented at the nearby sites and because the parcel lies within LUC zones previously established by CERCLA decision documents.

Response: Pending an update of the Land Use Controls associated with the Eastern Plume including establishment of metes and bounds of a groundwater use control boundary, Parcels REC-7 and EDC-13 have been removed from FOST 2012-1.

Please also note:

1. It should be made clear in the FOST that for the EDC 13 and REC 7 parcels, there is no currently approved Land Use Control (LUC) boundary for the Eastern Plume. The 1992 and 1998 Records of Decision (ROD) did not establish such a boundary for the Eastern Plume.
An "Explanation of Significant Difference" (ESD-2000) was approved that required the development of the LUCs but these were established as "interim" only.
Therefore a LUC boundary should be developed that meets the requirement of the latest ESD.

Response: See response to Comment 2.

2. A "Technical Review" committee meeting should be convened to discuss the adequacy of the "interim" LUCs, the long term LUCs needs and the adequacy of the 2007 NASB Instruction 5090.1C in general to define current LUC's for transferred parcels.

Response: The Navy has been developing LUCs for transfer parcels in each respective FOST as they are prepared. These parcels have not been IR, MRP, POL or AOPI sites which will have their own respective LUCs as part of the decision document process.

III. Missing References:

The RODs and ESDs for the Eastern Plume need to be added.

Technical Memorandum for Building 87 Groundwater Assessment needs to be added.

Response: The references for the RODs and ESDs for the Eastern Plume are no longer needed to support the text because Parcels EDC-13 and REC-7 have been removed from the FOST. The reference for the Technical Memorandum for Building 87 Groundwater Assessment was already cited in Exhibit A of the Draft FOST.

IV. Additional Appendices

The 2007 NASB Instruction 5090.1C that describes the "interim" LUCs applicable to groundwater should be added as an APPENDIX (rather than listing it as a reference as recommended by MEDEP).

Response: Relevant figures and/or sections of the Base Instruction are no longer needed to support the text because Parcels EDC-13 and REC-7 have been removed from the FOST.

V. BACSE endorses MEDEP comment No.21 regarding Site 12 for restricting public access.

Response: The Navy agrees that a fence surrounding the Site 12 investigation area is necessary to keep the public out of this active investigation area. A proposed location for the fence is being prepared by the Navy and will be released to the regulators and the Town when available. However Parcel REC-7, including the land surrounding Site 12, has been removed from FOST 2012-1 pending further evaluation/investigation.

VI. BACSE recommends refining the boundaries shown of the Eastern Plume based on worst-case criteria rather than optimistic projections. (see note #2 under item II above)

Response: See response to Comment 2.

VII. BACSE recommend creating a buffer zone around the abandoned Casco Bay Fuel line in case that needs to be excavated or if at some time in the future leakage in soil is discovered.

Response: Section 3.3 has been revised as follows: "No releases to the environment associated with the pipeline were known to have occurred on the NASB Main Base where the pipeline remains abandoned-in-place. During removal of seven miles of the pipeline off-base between Mitchell Field and the southern base boundary only two locations were found where jet fuel had leaked to surrounding soil. At both locations the soil was excavated and disposed of off-site and post removal confirmation sampling indicated VPHs and EPHs were not detected or well below MEDEP remediation guidelines." The Navy does not believe that a buffer zone around the pipeline is necessary to protect human health or the environment. Exhibit G "Restrictions, Provisions and Conditions" for parcels EDC-11 and 14 require the Grantee to notify the Navy if previously unidentified contamination is encountered during soil disturbing activities and restricts groundwater use in these parcels.

VIII. BACSE recommends establishing groundwater extraction oversight for the golf course facility to insure that its use for turf watering does not affect contamination remediation up gradient at sites such as the Eastern Plume.

Response: Parcel EDC-14, the golf course, is proposed for transfer to MRRA. It will be their responsibility to monitor groundwater extraction at the public water supply well located at the golf course club house (for club house and restaurant uses) and surface water extraction (for irrigation of a 9-hole golf course and driving range) from the irrigation pond. These two uses are exempt from the groundwater use restriction up to their current baseline extraction levels. Any use above those levels will need to be approved by the Navy and applicable regulatory agencies. Neither activity at the Golf Course, at current extraction levels, has been shown to impact the Eastern Plume.

IX. Regarding the use of groundwater as a potable water source at the Golf Course. The State Department of Health must be contacted to insure that State requirements are being met, since their requirements may differ from the Federal requirements currently in place. Clarification is also required as to the status and licensing of any facilities such as snack bars and whether there are existing franchises that are being transferred.

Response: Comment noted. MRRA will be responsible for registration and operation of the groundwater extraction well at the golf course club house public water well after property transfer. DHHS has granted the Navy's request to de-register this well and MRRA will need to register the well and comply with DHHS requirements including compliance sampling. The Navy previously had to conduct quarterly well sampling.

This environmental suitability determination was prepared to address Federal hazardous substance requirements and does not address licensing/franchise issues.