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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT INTERIM
REMEDIAL ACTION COMPLETION REPORT FOR AREA OF CONCERN 55C NAS SOUTH
WEYMOUTH MA
12/01/2010
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

December 1, 2010

Brian J. Helland, P.E.
BRAC Program Management Office NE
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Draft Interim Remedial Action Completion Report for Area of Concern 55C

Dear Mr. Helland:

Thank you for the opportunity to review the draft "Remedial Action Completion Report" for Area of Concern 55C" at the Naval Air Station South Weymouth, dated October 2010. The document presents the results and documentation for the removal action. EPA reviewed the document for consistency, technical accuracy and completeness and for general compliance with EPA guidance for completion reports. Detailed comments are provided in Attachment A.

The work completed at the site was a non-time critical removal action. Please revise the title of this document to "Interim *Removal* Action Completion Report."

The pre-excavation survey (Appendix F) was not provided with the draft Interim Removal Action Completion Report. Please submit the survey to EPA before the next revision of this report.

Add a table presenting milestones for the removal action tasks including dates to summarize the progress of the removal action.

Please provide a figure that shows the total depth of excavation within each of the grids. Section 3.3.1 refers to excavation depths reaching six feet below ground surface, but that depth was only achieved at Grid 007. This figure would conveniently clarify the extent of the removal action.

Please provide a figure, essentially an as-built drawing, which shows the limits of the vernal pool and the limits of the wetlands following completion of the removal action. If the post-excavation survey has not yet been completed, please indicate when that will be done and when the survey will be provided for review. That survey must be provided before EPA can accept the completion report.

A confirmation sample in the area under the soil stockpile was required by the work plan but is not mentioned. Please include the results for that sample and discuss it in the document. EPA notes further that because the soil stockpile was relocated, a second soil sample beneath the second location would be warranted to satisfy the intent of the work plan.

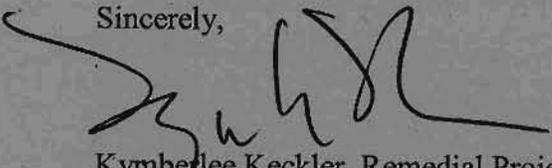
Analytical data for fill material testing is included in Appendix D. However, the fact that the fill material was analyzed and the results of the analyses are not mentioned. Please discuss the

analytical data for fill material testing, clarify what soils were used for backfill at AOC-55C, and document the sample identifiers for those soils because the Appendix D data does not identify the fill material samples directly.

In sidewall sample 002 (PER-002), dieldrin was detected at 425 ug/kg. As noted in Section 4.3, "an additional two (2) feet was excavated from Sidewall 002 and re-sampled on April 8, 2010." The dieldrin concentration in this sample was below the RG. Given the magnitude of the dieldrin exceedance in PER-002, however, additional sampling is warranted to ensure that the extent of the dieldrin contamination is determined in this area.

I look forward working with you and the Massachusetts Department of Environmental Protection to complete the cleanup of Area of Concern 55C. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Dave Barney, USN, South Weymouth, MA
Dave Chaffin, MADEP, Boston, MA
Kevin Donovan, SSTTDC, South Weymouth, MA
Phoebe Call, TTNUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 3-1, §3.1	The text refers to Revisions 000 and 001 implying that Revision 001 was the Final RAWP. However, the Final RAWP was Revision 02 dated January 2010. Please correct as appropriate.
p. 3-3, §3.2.6, ¶2	The second sentence refers to re-excavation in Grids 003 and 018 and Perimeter Wall 002, which necessitated the relocation of the soil stockpile. It appears the reference should be to Grid 015, not 018, because Grid 018 is not proximate to Grids 003 and Perimeter Wall 002. Please correct as appropriate.
p. 3-4, §3.3.1, ¶2	Please review the sequence of excavation described. The text refers to Grids 019 and 022 which do not exist; the reference should apparently be to Grids 018 and 021. Please correct as appropriate.
p. 4-3, §4.4	The sample identifiers need to be corrected. Specifically, it appears that Grid 19 (FLR-019) should be Grid 18 (FLR-019) and the reference to additional excavation in Grid 019 should be to Grid 018 because there is no Grid 019.
p. 4-3, §4.5	The reference to Grid 022 should be to Grid 021 because there is no Grid 022. Sample Grid 021 (FLR-022) was the duplicate for Grid 021 (FLR-021). Please correct as appropriate.
p. 4-4, §4.6	a) The reference to Grid 022 (FLR-122) should be to Grid 021 (FLR-122) because there is no Grid 022. Sample Grid 021 (FLR-122) was the follow-up confirmation sample collected in Grid 021. Please correct as appropriate. b) The first paragraph implies that there is only one area in Figure 3 designated for deeper excavation. However, there are two. Please clarify how the excavation was conducted at the other deeper excavation area and why no floor or perimeter samples were collected from that area.
Figure 3	The Legend figure indicates that a clean soil berm will be used if necessary. Please edit this figure and the text to clarify whether the clean soil berm was installed and whether it was subsequently removed following the completion of the excavations. Was this berm constructed with clean soil imported from off-site?
Figure 4	a) According to this figure, the silt fence was located within the limits of excavation. If the silt fence was initially installed where shown on this figure, please clarify that it was subsequently relocated when the extent of the excavation area was laid out, if that is what happened. Show the final location for the silt fence.

b) This figure also refers to a clean soil berm (if necessary). Please edit the Legend to either remove "(if necessary)" or remove the soil berm if it was not used.

c) This figure identifies two deeper excavation areas with a maximum depth of six feet below ground surface. Neither was excavated to six feet bgs, so edit the note to remove the depth. Also, please confirm that the one deeper excavation in Grid 021 was dug no deeper than the remainder of Grid 021.

Appendix A

Photograph 7 refers to the "Improved vernal pool berm prior to planting." However, it is not apparent that a vernal pool berm existed before the removal action based on the existing conditions plan. Please clarify why this photograph refers to an improved vernal pool berm and indicate if the size of the vernal pool decreased following this removal action. If changes were made to the size of the vernal pool or the wetlands area, please provide documentation that the changes were made in conformance with the direction provided by the local conservation commission and with the approval of the Army-Corps of Engineers and MADEP and discuss the changes and documentation for the approvals in the report.

Appendix B

This appendix is said to include three attachments comprised of two letters responding to EPA comments and one letter responding to U.S. Fish and Wildlife Service comments. The three attachments are missing from this appendix and should be included.

Appendix C

It is noted that Steve Ivas, the local conservation commission representative, only signed in to enter the site on February 22, 2010 at which time excavation was still in progress. Please clarify what direction was provided by Mr. Ivas during the site restoration given that he only visited the site that one time. According to the pre-construction meeting minutes Mr. Ivas was to conduct site visits during site restoration to assist in the details of the site restoration. It is not clear that that occurred or that any oversight from the local conservation commission was received. Please edit the report to more fully describe oversight direction received from the local conservation commission.

Appendix D

a) EPA notes that the fill material samples, which are assumed to be those identified as WNAS-WE14-55C-BF-001, 002, 003, and 004, all exceeded the arsenic remedial goal of 5.31 mg/kg. BF-001 had an arsenic concentration of 9.2 mg/kg, BF-002 had an arsenic concentration of 6.0 mg/kg, BF-003 had an arsenic concentration of 7.2 mg/kg, and BF-004 had an arsenic concentration of 6.6 mg/kg. Also, please clarify why BF-003 and BF-004 were only analyzed for arsenic and cadmium. Samples BF-005 and BF-006, topsoil samples, both achieved all the remedial goals. The post-construction risk assessment should document that the final contaminant concentrations do not result in excess ecological or human health risk.

b) Where were samples STP-001 through 004 collected and why are they included in this report?

c) What are the samples in Lab Sample ID M91524, said to be related to Site 3? Why are they in this report?

Appendix F

The survey that comprises this appendix was not provided. Please provide it (which reportedly is a pre-construction survey) as well as a post-construction survey for review by EPA.