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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT PROPOSED
PLAN FOR MAIN GATE ENCROACHMENT AREA NAS SOUTH WEYMOUTH MA
06/06/2011
U S EPA REGION I



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

June 6, 2011

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

Re: *Draft Proposed Plan – Main Gate Encroachment Area, Former Naval Air Station
South Weymouth, Weymouth, Massachusetts – May 2011*

Dear Mr. Helland:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above-referenced document and offers the attached comments and recommendations. The EPA recommends that a meeting be convened, at your convenience, to discuss and resolve the issues outlined in the proceeding pages.

In the interim, please feel free to contact me at (617) 918-1393, should you have any questions in regards to this matter. I look forward to speaking with you soon.

Sincerely,

A handwritten signature in cursive script that reads "Carol A. Keating".

Carol A. Keating
Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Dave Barney, USN-Weymouth
Dave Chaffin, MADEP
Kevin Donovan, SSTTDC
Phoebe Call, TTNUS
Rick Sugatt, EPA
Jeanethe Falvey, EPA
Rona Gregory, EPA

**EPA Comments on the
Draft Proposed Plan – Main Gate Encroachment Area
Operable Unit 26 – Naval Air Station South Weymouth, Weymouth, MA
May 2011**

General Comment

1. Consistent with the text in “The Proposed Plan” section of the document, all references to the “Naval Air Station South Weymouth” and “NAS” should be preceded by the word “former.”

Page-Specific Comments

2. Page 1, The Proposed Plan – Please amend the first sentence to read, “This document was prepared in accordance with federal law to present the Navy’s proposed **No Further Action** decision for the Main Gate Encroachment Area of Concern (AOC) at the former Naval Air Station (NAS) South Weymouth....”
3. Page 1, Introduction – Please amend the bullets after “The purpose of this plan is to:”
 - Provide information about the environmental investigations and removal actions completed at the Site;
 - Identify and explain the Navy’s this Proposed Plan;
 - Encourage public review, and comments and involvement in this decision process.
 - Provide information on how the public can be involved in the decision-making process.”
4. Page 2, Figure 1 – Although the EPA commends the Navy for its use of different colors and fonts to distinguish headings in the document and demarcate the location of the operable unit from the rest of the Base, the figure can be further improved by adding basic, helpful features to help orient the reviewed (e.g., Town names, Rt 18. etc.) The Navy should consider having two figures; one with a map that *doesn’t* show the whole base outline but zooms in on the site and another with a map of the base boundary for comparison.
5. Page 2, The CERCLA Process..., 2nd ¶, last sentence - Please delete “PAHs” and insert “Polycyclic Aromatic Hydrocarbons (PAHs).”
6. Page 2, The CERCLA Process..., 3rd ¶, 2nd sentence - Please delete “the” before “EPA” and insert “CERCLA” prior to “removal action.”

7. Page 2, Site Background and..., 1st ¶ - Please insert "abutter's" prior to "property line" in the second to last sentence and replace "abutter's property line" in the last sentence with "fencing."
8. Page 3, Site Background and..., 1st ¶, last sentence - Please insert ", without the Navy's permission," after "were stored" and prior to "on Navy property."
9. Page 3, Site Background and..., 2nd ¶, 1st sentence - Please insert, "has been" after "new fence" and prior to "installed along the property line."
10. Page 3, Environmental Investigations, 2009-2010 - Please insert "under CERCLA" after "EE/CA" and prior to "to determine the most appropriate."
11. Page 3, Environmental Investigations, 2011 - Please insert "under CERCLA" after "NTCRA" and prior to "to remove impact soil..."
12. Page 4, 2008 Field Investigation, 2nd bullet - Please delete "Hydrocarbons" and insert "Polycyclic Aromatic Hydrocarbons (PAHs)."
13. Page 4, 2010 EE/CA, 1st sentence - Please insert "(NTCRA)" at the end of the sentence.
14. Page 4, 2010 EE/CA. Last ¶ - "Cleanup Goal(s)" should be defined, either in the text or in the "Glossary of Terms" at the end of the document. For example, the language could read, "Cleanup Goals are determined through a careful risk analysis process. It is a number derived from an assessment that considers a variety of factors about how a human, or organism, could be exposed to a chemical and how likely that exposure is, depending on where or how much is in the environment. The cleanup goal is the level at which the chemical is unlikely to cause harm in that particular environment (these goals may differ between soil, sediment, air or water), and is therefore considered acceptable to be left or monitored thereafter."
15. Pages 4 and 5, Chemicals of Concern Tables - EPA concurs with the DEP's recommendation to add a site-maximum column to each of the tables.
16. Page 6, Rationale for the NFA Proposal - This section should also explain why there is, or isn't, a need for a Five-Year Review under CERCLA.