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NAS SOUTH WEYMOUTH  
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LETTER AND U S EPA REGION I COMMENTS ON RESPONSE TO COMMENTS  
REGARDING DRAFT FINAL SAMPLING AND ANALYSIS PLAN/FIELD SAMPLING AND  
QUALITY ASSURANCE PROJECT PLAN FOR REMOVAL ACTION NAS SOUTH WEYMOUTH  
MA  
01/07/2011  
U S EPA REGION I



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I**

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

January 7, 2011

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

Re: Responses to EPA's Comments on the Draft Final Sampling and Analysis Plan/Field Sampling and Quality Assurance Project Plan for Removal Action at the Main Gate Encroachment Area

Dear Mr. Helland:

Thank you for the opportunity to review the responses, dated December 16, 2010, to EPA's comments, dated August 20, 2010, for the draft final *Sampling and Analysis Plan/Field Sampling and Quality Assurance Project Plan for Removal Action* for the Main Gate Encroachment Area at the Naval Air Station South Weymouth, dated August 2010 (referred to as the SAP). The document describes the guidelines for the systematic data collection and analysis associated with the remedial action and conforms to the Uniform Federal Policy for Quality Assurance Project Plans. This SAP supplements the draft Remedial Action Work Plan (RAWP) previously submitted. Specific Comments are provided in Attachment A using the numbering in the responses for those requiring further action or clarification.

I look forward working with you and the Massachusetts Department of Environmental Protection on the investigation and remediation of the remaining areas of the base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kimberlee Keckler".

Kimberlee 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>  |
|---------------|---|
| 3. p. 16, ¶ 1 | <p>a) The response is not correct. Any sampling and analysis protocols for frequency, number of samples, or analytes included in the EE/CA were developed solely to estimate costs for the proposed alternative. These EE/CA protocols do not impose any requirements on the remedial action work plan, which must develop defensible sampling and analysis requirements irrespective of what was included in the EE/CA. Please edit the subject text to make this clear.</p> <p>b) Figure 4, the access road water crossing detail, was submitted with the RTCs and provides information not available in the draft RAWP as to how the crossing will be accomplished. Based on this information, EPA concurs that a confirmation sample from the access road is not required. However, EPA requests the following additions to the detail and/or the RAWP: 1) place a geotextile barrier horizontally over the access road beneath the final backfill to limit contamination of the backfill stone; 2) indicate in the revised RAWP if Navy intends to sample and dispose the backfill stone as contaminated material; 3) the detail in Figure 4 shows a view parallel with the stream and presumably the sides of this detail would be placed up the stream bank which is presumed to be sloped; 4) no detail is provided perpendicular to the stream direction but presumably these sides of the access road would also be sloped for stability and would have to be protected with geotextile as well or the purpose of the geotextile shown in Figure 4 would be defeated.</p> |
| 4. p. 17      | <p>EPA sought explanation for the selected RGs for fluoranthene and pyrene in soil. The response appropriately notes that the RGs are risk based, if risk based values are greater than background concentrations. The RGs, however, are only based on human health SSLs and are not protective of ecological receptors. Please refer to the ECODQLs (from Table 2-2 in the EE/CA) to ensure that RGs are protective of both human and ecological receptors.</p>  |
| 5. p. 20      | <p>b) EPA concurs that the fill material should be managed and evaluated in the same way it was done for the WGL. Therefore both organic and inorganic contaminants will be compared to the remedial goals and the MassDEP RCS-1 as appropriate to identify any exceedances. If exceedances are found or if multiple contaminants are detected at concentrations that make the overall quality of the fill questionable regarding risk thresholds, then the project team would need to mutually resolve a course of action, including the possibility of a streamlined risk assessment. As EPA noted, the site background for benzo(a)pyrene alone results in an excess residential risk greater than <math>1 \times 10^{-4}</math> based on RSLs and EPA considers it inappropriate to import fill to the site that results in excess risk.</p>  |
| 11. p. 51     | <p>b) Worksheet 14.2 states that waste profile samples and VOC analyses are required to characterize the waste soil and sediment. Therefore, EPA's comment needs to be</p>  |

addressed.

13. p. 53      Worksheet 14.3 is for fill material and VOC analyses have been identified as required analyses for fill material. Therefore EPA's comment needs to be addressed if this worksheet remains in the SAP.
  
16. p. 66-76    EPA does not concur that fill material be removed from all worksheets except 10 and 17. That is not what was done for WGL. See Revision 4 of the WGL QAPP/SAP (October 18, 2010) and plan to present the fill material as was done for that QAPP/SAP.