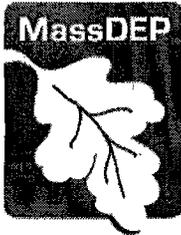


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LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT PROPOSED PLAN FOR AREA OF CONCERN 55C
OPERABLE UNIT 2 (OU 2) NAS SOUTH WEYMOUTH MA
02/07/2011
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

DEVAL L. PATRICK
Governor

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Secretary

TIMOTHY P. MURRAY
Lieutenant Governor

KENNETH L. KIMMELL
Commissioner

Mr. Brian Helland, P.E.
Remedial Project Manager
BRAC PMO, Northeast
4911 South Broad Street
Philadelphia, PA 19112

Re: Draft Proposed Plan
Area of Concern 55C
Former NAS South Weymouth
MassDEP RTN 4-3002621
February 7, 2011.

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, reviewed the draft *Proposed Plan, Area of Concern 55C – Wetland North of Trotter Road, Operable Unit 2, Naval Air Station South Weymouth, Weymouth, Massachusetts*, received January 24, 2011. Comments are attached.

If you have any questions, I can be reached at (617) 348-4005.

Sincerely,

David Chaffin
Federal Facilities Project Manager
Bureau of Waste Site Cleanup

CC: D. Barney, USN-S. Weymouth
K. Keckler, USEPA
Chief Executive Officer, SSTTDC
RAB Members

2/10/11

300-886 (TR) is posted on the website for your review.

MASSDEP has reviewed the draft Proposed Plan, Area of Concern 55C – Wetland North of Trotter Road, Operable Unit 2, Naval Air Station South Weymouth, Weymouth, Massachusetts, received January 24, 2011. Comments are attached.

MASSDEP has reviewed the draft Proposed Plan, Area of Concern 55C – Wetland North of Trotter Road, Operable Unit 2, Naval Air Station South Weymouth, Weymouth, Massachusetts, received January 24, 2011. Comments are attached.

**MASSDEP COMMENTS ON
DRAFT PROPOSED PLAN
AREA OF CONCERN 55C
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
FEBRUARY 7, 2011**

1. Page 2, Right Column, 4th Paragraph: The description of streamlined risk assessments in the second sentence is inconsistent with the description provided on p. 4 and unnecessary at this point in the document. Deletion is recommended.
2. Page 3, Left Column: Because AOC 55C is a disposal site, rather than a parcel of land, the first sentence should be reworded to indicate that AOC 55C is or was located on a 0.4-acre parcel of land.
3. Page 3, Right Column: The term “engineering evaluation/cost estimate” should be replaced with “engineering evaluation/cost analysis”.
4. Page 4, Left Column, Bullet List: Because a single analyte with a concentration exceeding a screening value could pose significant risk, word choices concerning the number of analytes detected above screening levels should not imply insignificance (“but only one” and “a few”).
5. Page 7, Left Column: Inconsistencies about the quantities of soil removed and imported (1,620 cy vs. 1,224 cy) and depths of excavation and backfill (2 feet vs. 1.5 feet) should be corrected or explained, and the design characteristics of the soil used to restore the wetland area should be noted.
6. Page 7, Left Column: The Proposed Plan should not be issued for public review until the completion report has been accepted by the regulatory agencies (the removal action completion report is currently under review).
7. Page 7, Right Column, 1st Bullet: The plan should include a stronger statement about post-removal risk. While mitigation of risk is necessary (“unacceptable risks...have been mitigated”), it is not sufficient to reach a no-further-action decision.
8. Glossary of Terms: The glossary should include the term “Streamlined Risk Assessment” (refer to the AOC Hangar 1 Proposed Plan for an acceptable description for human health).