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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING FINAL REMOVAL
ACTION WORK PLAN FOR AREA OF CONCERN 55C NAS SOUTH WEYMOUTH MA
01/12/2010
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

January 12, 2010

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

Re: Final Removal Action Work Plan for Area of Concern 55C

Dear Mr. Helland:

EPA reviewed the *Final Removal Action Work Plan for Area of Concern 55C* at the Naval Air Station South Weymouth dated December 2009 (RAWP). The document presents the removal action objectives and describes how the removal action will be conducted. Detailed comments are provided in Attachment A.

As mentioned in my e-mail dated January 11, 2010, Appendix D states that the sum of the PAHs that are contaminants of concern (COCs) for the site will be added and compared to the PAH cleanup goal of 17,992 micrograms per kilogram ($\mu\text{g}/\text{Kg}$). This is not acceptable because the cleanup goal for PAHs based on toxicity testing was established using the sum of all PAHs. The total PAHs in Table 1 are two to three times greater than the sum of the COC PAHs in Table 2. Please revise the work plan to require that the sum of all PAHs will be used for comparison to the cleanup goal of 17,992 $\mu\text{g}/\text{Kg}$. This change affects many of the worksheets in Appendix D.

I look forward working with you and the Massachusetts Department of Environmental Protection on the final remedy for AOC55C. Please do not hesitate to contact me at (617) 918-1385 should you have any questions before our January 14, 2010 meeting.

Sincerely,

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

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. 3-3, §3.3	<p>Please ensure that the Notice of Intent is submitted in a timely manner so that approval of the NPDES permit for discharge of dewatering fluids request is obtained before any discharge of water from dewatering activities.</p> <p>Furthermore, based on the content of the text, it sounds like, if dewatering is required it could have a significant impact on the project schedule, although Appendix A indicates that only six days would be required to complete the dewatering activity requirements. Please verify the schedule.</p>
p. 3-4, §3.6	<p>This section does not mention the deeper excavations. Since the sidewall sample from the deeper excavations will be collected from deeper than six inches, some differentiation is warranted in the description here to avoid confusion during sampling.</p>
Appendix A	<p>Reportedly, the herpetological study will no longer be included in the scope of work, although it is shown in this schedule. Please clarify why this study has been deleted and update the schedule to reflect this change.</p>
Appendix D, SAP Worksheet #10	<p>a) On page 20 of 189 the statement differentiating soil from sediment samples is no longer applicable. Please delete this language throughout the document to recognize that soil and sediment samples have the same cleanup goals.</p> <p>b) On page 22 of 189, please revise this entire figure to recognize that no differentiation will now be made between soil and sediment samples. Also, correct the text associated with the confirmation sampling that incorrectly identifies a discrete sample for sidewall sampling.</p> <p>c) On page 23 of 189 please revise the figure to show the limits of excavation rather than limits of disturbance.</p>
Appendix D, SAP Worksheet #14.3	<p>In addition to the selected individual PAHs, the analysis for the fill material must include all PAHs not just PAHs that are COCs, based the cleanup goals established from the toxicity test results. Please correct the analyte list for fill material throughout the document. Note also the laboratory must report Aroclor 1260 separately.</p>
Appendix D, SAP Worksheet #15.1	<p>Please correct footnote 8 on page 51 of 189. Total PAHs must include all PAHs not just COC PAHs, based the cleanup goals established from the toxicity test results.</p>
Appendix D, SAP Worksheet #18	<p>Please correct the sample numbers and the analyte lists. The analyte lists must include total PAHs in addition to the COC PAHs and must include Aroclor 1260 reported separately.</p>

Appendix D, SAP
Worksheet #19

The analyte list must also include total PAHs (not the sum of the COC PAHs). Please correct throughout the document.

Appendix D, SAP
Worksheet #20

The analyte list must also include total PAHs (not the sum of the COC PAHs). Please correct throughout the document.

Appendix D, SAP
Worksheet #30

The analyte list must also include total PAHs (not the sum of the COC PAHs). Please correct throughout the document.

Appendix D, SAP
Worksheet #36

The analyte list must also include total PAHs (not the sum of the COC PAHs). Please correct throughout the document.