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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I ON RESPONSE TO COMMENTS
REGARDING DRAFT 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: Responses to Comments on the Draft Removal Action Work Plan for Area of Concern 55C

Dear Mr. Helland:

Thank you for the opportunity to review the responses, dated December 24, 2009, to EPA's comments, dated December 11, 2009, on the Draft Removal Action Work Plan (RAWP) for AOC-55C at the Naval Air Station South Weymouth dated November 2009. Detailed comments are provided in Attachment A.

GC2: The response states that all areas of the text describing the confirmation sampling have been revised to indicate both the stockpile sampling and the sampling in the deeper excavations. All the required changes have not been made. For example, on page 25 of 189, the confirmation sample from beneath the soil stockpile area is not included and on page 45 of 189 the deeper excavations are not mentioned. Please check the document for other omissions.

GC3: The response states that revised Table 6 from the Final EE/CA has been incorporated into the work plan. The revised work plan does not recognize that there are no longer separate cleanup goals for soil and sediment in several instances. While Table 6 presented a list of cleanup goals that is applicable to both soil and sediment, a distinction between them no longer exists and the work plan still discusses separate samples for soil and sediment. For example, see Worksheet #17 page 64 of 189 and see Worksheet #18 page 67 of 189 where the footnote states that a determination will be made whether to collect samples as soil or sediment. Please correct the work plan to incorporate this change.

GC5: On page 47 of 189, Item #1 under Sampling Tasks, PCBs have been omitted as an analyte for waste characterization.

GC7: Please refer to EPA's comment on the response to GC3.

GC8: Please refer to EPA's comment on the response to GC3.

GC9: Not all references to the 2007 Ecological Risk Assessment have been replaced with the October 2009 Final Ecological Risk Assessment. Corrections are needed for worksheets 10, 13, 15.1, 15.2, and 15.4. Also, the Final EE/CA date of December 2009 should replace references to earlier versions of the EE/CA in the Work Plan (see page 18 of 189).

GC10: A 50-foot survey grid is too large for this site and would result in the collection of only about 10 to 12 points. At a minimum, the survey grid should be a 25-foot grid which would produce approximately 35 points and provide a more appropriate database for restoring the topography necessary to properly protect the vernal pool. Please revise the pre- and post-construction survey scope to require a 25-foot grid with elevations shot to an accuracy of 0.01 foot.

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,



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>Number</u>	<u>Comment</u>
SC1	The comment refers to Appendix B, page 2-1, §2.1.1
SC7	If protection from herbivory is not provided during the removal action, the monitoring plan must provide early and often inspections to detect herbivory before it causes irreparable damage to vegetation. EPA prefers protection during the removal action that should result in the need for less frequent inspection during wetland restoration monitoring. Annual monitoring of vegetation, as proposed in the restoration plan, is not frequent enough to protect young vegetation.
SC 10c	Please refer to the comment on the response to GC2.
SC 11a	Please correct the sample numbers.
SC 11b & c	Please correct the total number of samples required for the deeper excavations. Since there are at least two discrete deeper areas, at least two floor and sidewall samples will be required, not one.
SC 11d	There are multiple citations throughout the work plan where the list of COCs presented needs to be corrected and clarified. This is necessary to ensure that the correct list of COCs is reported by the laboratory. Worksheet #18 should list total PCBs and Aroclor 1260 (both need to be reported), and should list total PAHs (not just the sum of the PAHs that are COCs).
SC 11e	Please further revise the referenced footnote to clarify that one floor sample will be collected from each separate deeper excavation and one sidewall sample will be collected from the sidewalls of each separate deeper excavation.
SC 12a	Please ensure that Aroclor 1260 is reported separately.
SC 13a	Please further revise the referenced footnote to clarify that one floor sample will be collected from each separate deeper excavation and one sidewall sample will be collected from the sidewalls of each separate deeper excavation.
SC 17b	While CERCLA projects are exempt from obtaining permits they are not exempt from meeting the substantive requirements of the permits. Consequently, the Navy, in consultation with the local conservation commission, must comply with any order of conditions imposed on the removal action by the conservation commission. Please edit the work plan to ensure the conditions are identified before clearing of the site begins.
SC 20	EPA maintains that the planting of larger trees would be beneficial.