

N00101.AR.002462
NAS SOUTH WEYMOUTH
5090.3a

LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING LONG TERM MONITORING ANNUAL REPORT 2009 RUBBLE
DISPOSAL AREA OPERABLE UNITS 2 (OU 2) AND 9 (OU 9) NAS SOUTH WEYMOUTH MA

04/02/2010

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

IAN A. BOWLES
 Secretary

TIMOTHY P. MURRAY
 Lieutenant Governor

LAURIE BURT
 Commissioner

Mr. Brian Helland, RPM
 BRAC PMO, Northeast
 4911 South Broad Street
 Philadelphia, PA 19112

Re: 2009 Annual LTM Report
 Rubble Disposal Area
 Former South Weymouth NAS
 RTN 4-3002621
 April 2, 2010

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, reviewed the *Long-Term Monitoring Annual Report - 2009, Rubble Disposal Area, Operable Units 2 and 9, Naval Air Station South Weymouth*, dated March 2010. Comments are attached.

If you have any questions about the comments, 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
 Executive Director, SSTITDC
 RAB Members
 A. Malewicz, MassDEP-Boston

**MASSDEP COMMENTS ON
2009 ANNUAL LONG-TERM MONITORING REPORT
RUBBLE DISPOSAL AREA
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
APRIL 2, 2010**

1. Section 4.2: The proposed modifications to the groundwater and surface water monitoring programs are premature. The existing program was implemented less than a year ago, and the modifications implemented at that time included a significant reduction in the original analytical program. To ensure that the results cited to justify further reductions are representative of long-term conditions, additional rounds of samples should be collected using the existing protocol before further reductions are considered.
2. Section 4.2: While the proposed reductions in the scope of the groundwater and surface water monitoring programs are not acceptable at this time, a reduction in the scope of the reporting effort for the long-term monitoring program would be acceptable. More specifically, as discussed during the January 14 BCT meeting, a reporting program consisting of the following submittals would be acceptable: (1) semi-annual data reports providing the monitoring data obtained during each semi-annual monitoring event, and (2) comprehensive annual reports presenting an evaluation of the data collected during each calendar year.