

N00101.AR.002471
NAS SOUTH WEYMOUTH
5090.3a

LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING REVISE REMEDIAL INVESTIGATION REPORT FOR SOLVENT
RELEASE AREA NAS SOUTH WEYMOUTH MA

05/18/2010

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: Remedial Investigation Report
 Solvent Release Area Site
 Former South Weymouth NAS
 RTN No. 4-3002621
 May 18, 2010

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, has reviewed the revised report: *Remedial Investigation for Solvent Release Area (IR Site 11) Naval Air Station South Weymouth, Weymouth, Massachusetts*, dated April 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, SSTDC
 RAB Members

**MASSDEP COMMENTS ON
REVISED REMEDIAL INVESTIGATION REPORT
SOLVENT RELEASE AREA SITE
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
MAY 18, 2010**

1. Section 6.6.2.1: Though the estimated cancer risks for recreational users were within USEPA's "target risk range", these risks should not be considered acceptable because they exceeded the state cancer-risk threshold [1×10^{-5} , 310 CMR 40.0993(6)]. More specifically, the risk estimates for the child recreational user (3×10^{-5}) and lifelong recreational user (4×10^{-5}) are not acceptable because they exceeded the state threshold. The primary contributor to these exceedances was the risk associated with exposure to contaminants in surface water in the East Mat Ditch. Accordingly, the feasibility study should include alternatives that address conditions in the East Mat Ditch.
2. Section 6.7.3.11: The risk estimates for residential exposure to chemicals in groundwater by inhalation ($ILCR \leq 1 \times 10^{-1}$ and $HI \leq 154$, Section 6.7.3.5) and by dermal contact with irrigation water ($ILCR \leq 6 \times 10^{-3}$ and $HI \leq 3$, Section 6.7.3.9) indicate that recreational exposure to site groundwater used for irrigation (e.g., watering soccer fields) could pose unacceptable risk. Consequently, until explicitly evaluated and found acceptable, such exposure should be presumed unacceptable and addressed as such in the upcoming feasibility study.
3. Section 8.2: MassDEP agrees that a feasibility study is required to address unacceptable risks to human health.