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LETTER REGARDING U S EPA REGION I REVIEW OF DRAFT FINAL DECISION  
DOCUMENT FOR REVIEW ITEM AREA 110 SOUTHEAST ANTENNA FIELD NAS SOUTH  
WEYMOUTH MA  
07/14/2009  
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

July 14, 2009

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

Re: Draft Final Decision Document for the Review Item Area 110 - Southeast Antenna Field

Dear Mr. Helland:

EPA reviewed the *Review Item Area 110 - Southeast Antenna Field Draft Final Phase II Environmental Baseline Survey Decision Document*, Naval Air Station South Weymouth, Weymouth, Massachusetts, dated June 2009 in light of its incorporation of EPA's comments on the March 2009 Draft Decision Document.

Overall, the Draft Final Decision Document has been revised and incorporates all EPA *comments* on the Draft Decision Document, with an enhanced evaluation of COPC exceedances and a better explanation as to why exceedances do not equate to unacceptable risk. Before EPA can fully accept the NFA decision, however, the Navy should confirm that the following issues have been addressed:

- 1) As stated in EPA's review of the April 2009 responses to our comments, the remaining concerns relative to the removal action included:
  - a. the remaining turtle barriers need to be removed,
  - b. the logs in the wetland that were apparently laid to aid passage need to be removed (not the apparently naturally-fallen tree), and
  - c. solid waste should be removed.
- 2) In a follow-up to General Comment 4, the argument that, for some chemicals, the 0.1X factor applied to non-cancer risk based benchmarks is not appropriate has been supplemented. The arguments need to be further supported, however:
  - a. For MCPA, in Section 6.1.3.1, the penultimate sentence states that no other COPC that target the liver and kidney are present at concentrations that exceed screening criteria. Vanadium and arsenic can affect the kidney and were detected at concentrations greater than benchmarks. Because they were not detected above background, however, the argument is still valid. Please state that the other COPC that target the liver and kidney were not detected above SOWEY UPLs.
  - b. The text (*e.g.*, Section 6.1.3.2 argument for antimony) suggests that additive toxic effects are only expected if chemicals with the same toxic mechanism occur at the same pole. Given that potential human receptors would not be limited to the areas around each pole but could be exposed throughout the site, the argument against potential additive effects must address COPC at all poles together.

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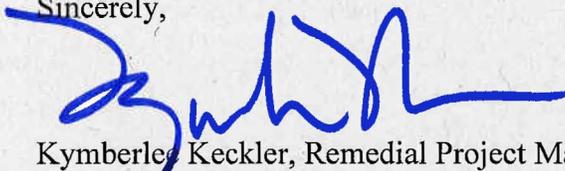
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- c. Manganese was detected at several locations, with the maximum concentration (760 mg/kg) at Antenna Pole 3. This concentration is greater than the adjusted (for potential additivity) benchmark of 180 mg/kg (*i.e.*, 1/10 of the EPA Regional Screening Level (RSL) for residential soil of 1800 mg/kg) and greater than the SOWEY background UPL (314 mg/kg). The value of 5500 mg/kg from the 1996 EPA Region I Risk Update is superseded by the April 2009 EPA Regional Screening Levels. Please evaluate whether there are enough chemicals with central nervous system effects to justify the use of the 1/10 factor on the non-cancer RSL.

I look forward working with you and the Massachusetts Department of Environmental Protection on the investigation and remediation of the remaining areas of the base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kimberley Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

cc: Dave Barney, USN, South Weymouth, MA  
Dave Chaffin, MADEP, Boston, MA  
Kevin Donovan, SSTTDC, South Weymouth, MA  
Phoebe Call, TTNUS, Wilmington, MA