N00101.AR.002490
NAS SOUTH WEYMOUTH
5090.3a

LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING LONG TERM MONITORING REPORT SEMI ANNUAL ROUND 1 2009 FOR OPERABLE UNITS 2 (OU 2) AND 9 (OU 9) NAS SOUTH WEYMOUTH MA
07/16/2009
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

TIMOTHY P. MURRAY
Lieutenant Governor

IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

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

Re: Round 1 (2009) Semi-Annual Report
Rubble Disposal Area
Former South Weymouth NAS
RTN 4-3002621
July 16, 2009

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, has reviewed the *Long-Term Monitoring Report, Semi-Annual Round 1 - 2009, Rubble Disposal Area, Operable Units 2 and 9, Naval Air Station South Weymouth*, dated June 2009. Comments are attached.

If you have any questions about the comments, I can be reached at 617-348-4005.

Sincerely,

D. Chaffin

David Chaffin
Federal Facilities Project Manager
Bureau of Waste Site Cleanup

cc: D. Barney, USN-S. Weymouth
K. Keckler, USEPA
Chief Executive Officer, SSTTDC
RAB Members
A. Malewicz, MassDEP-Boston

MASSDEP COMMENTS ON
ROUND 1 SEMI-ANNUAL LTM REPORT (MARCH 2009)
RUBBLE DISPOSAL AREA
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
JULY 16, 2009

1. Section 1.4: For future reference, the cited long-term monitoring plan was last revised in February 2009.

2. Section 3.1: Concentrations of manganese in six downgradient groundwater samples exceeded the remedial goal (313 ug/L) and the upgradient sample concentration (3,770 ug/L, MW05). The highest concentration reported in the downgradient samples was 20,100 ug/L (TT04). These results are consistent with the results from previous monitoring events, indicating that future action may be required to ensure the protectiveness of the remedy.

3. Section 3.2: Concentrations of manganese in three downgradient surface water samples exceeded the concentration reported in the groundwater sample collected from the upgradient monitoring well (3,770 ug/L, MW05). The highest concentration reported in the surface water samples was 11,600 ug/L (SW03). These results are consistent with the results from previous monitoring events, indicating that future action may be required to ensure the protectiveness of the remedy.

4. Sections 3.3 and 3.4: Consistent with previous monitoring results, methane concentrations exceeding 25 percent of the LEL were reported in the gas probe monitoring samples and confirmed by the results from the gas samples that were analyzed at an off-site laboratory. As noted in comments on previous monitoring reports, these results indicate that corrective action may be necessary to protect human health and safety [310 CMR 19.132(4)(h)]; in particular, the results continue to indicate that site conditions could pose a significant safety hazard to users of adjacent property (e.g., roadway construction adjacent to the north side of the site).

5. Section 4.4: While an investigation of potential non-site sources of methane would be a useful component of an assessment of the elevated methane concentrations reported in the gas probe samples, it is doubtful that the planned soil gas survey in the woods west (north?) of probes GP-01 and GP-02 would rule-out the site as a probable source of the methane and apparent site-related chemicals (e.g., benzene, toluene, xylene, 1,2,4-trimetylbenzene, dichlorodifluoromethane, and trichlorofluoromethane) reported in the gas samples. Consequently, rather than targeting nearby locations where buried peat may be a methane source, MassDEP recommends that a soil gas survey be conducted to delineate the lateral extent of methane and potential site-related chemicals in the immediate vicinity of the probes of concern. The distribution of methane and potential site-related chemicals in the vicinity of these probes would be expected to indicate a connection or lack of connection with the site, provide useful information about the extent of the potentially hazardous methane-impacted region, and in the event a site-connection is indicated, support the design of corrective action.

6. Appendix B should include validated methane results for sample GV-04. Please confirm/correct.

7. Appendix C should include a laboratory report for methane analysis. Please confirm/correct.