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LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING REVISED REMEDIAL INVESTIGATION REPORT FOR
BUILDING 82 NAS SOUTH WEYMOUTH MA
09/25/2009
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION



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

Re: Revised RI Report
Building 82 Site
Former South Weymouth NAS
RTN No. 4-3002621
September 25, 2009

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, reviewed the revised report: *Remedial Investigation for Building 82, Naval Air Station South Weymouth, Weymouth Massachusetts*, dated September 2009. Comments are attached.

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

Very truly yours,

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
REVISED REMEDIAL INVESTIGATION REPORT - BUILDING 82 SITE
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
SEPTEMBER 25, 2009**

1. Section 4.3: Based on the Navy's response to MassDEP Comment 4 on the draft remedial investigation report, MassDEP expects that the following releases to the environment associated with floor drain system structures and pipelines will be addressed during the feasibility study:
 - GTM-1 (Gas Trap Manhole No. 1), FDS-D1, and nearby catch basin: CVOCs were detected in the storm sewer sample B82-SW-MH1EAST, which was collected upgradient of the previously known release from GTM-2.
 - GTM-2 and FDS-D2: The RI sample results confirmed the release of CVOCs from GTM-2 and/or the associated pipelines (CVOCs were detected in downgradient groundwater samples B82-GP-A01, B82-MW-01, and B82-MW-02).
 - GTM-3 and FDS-D3: CVOCs were detected in a subsurface soil sample collected between 12 to 14 feet below ground surface (bgs) from sample location B82-SB-112. However, the dominant CVOC in the sample was PCE (1.1 mg/kg), indicating a source other than GTM-2 (where TCA is the dominant contaminant).
 - GTM-4, oil/water separator, FDS-D4, FDS-D5, and nearby catch basin: Metals concentrations reported in storm sewer sample B82-SW-MH3EAST significantly exceeded the concentrations reported in upstream storm sewer sample B82-SW-MH2EAST (e.g., lead at 154 ug/L vs. < 0.858 ug/L), indicating the presence of an intermediate contaminant source.

Also based on the Navy's response to MassDEP Comment 4 on the draft remedial investigation report, MassDEP expects that the following releases to the environment will be addressed during the feasibility study:

- Subsurface soil and groundwater beneath the Building 82 apron in the vicinity of sample locations SB08-025 and SB08-026; information obtained during recent construction work indicates that petroleum contamination extends under the apron.
- Subsurface soil in the vicinity of sample location B82-SB-200; VOCs were detected in a shallow soil sample (B82-SS-MW200S-0002) collected from this location.
- Subsurface soil and groundwater in the vicinity of sample locations B82-GP-D02 and SB-108; petroleum constituents were detected in soil and groundwater samples collected from these locations, and lead was detected above background levels in a soil sample (FDS5-R1-T1) collected nearby during a previous investigation.

- Subsurface soil and groundwater in the vicinity of the former location of FDS-D6; CVOCs, petroleum constituents, and metals with elevated concentrations were reported in samples collected from locations B82-GP-D01 and B82-SB-109, and lead and petroleum constituents with elevated concentrations were reported in a soil sample (FDS6-RR-FCO) collected nearby during a previous investigation.
 - Subsurface soil and groundwater in the vicinity of the former location of FDS-D4; soil beneath the former locations of the FDS-D4 drains and pipelines, which served a potential source of metals contamination (battery locker), was not sampled during the RI or the FDS-D4 removal action that preceded the RI.
 - Subsurface soil in the vicinity of the west end of test pit TP-100; elevated concentrations of lead and cadmium, which are not typical constituents of weathered roadway, were reported in sample B82-TP-100C-0303.
2. Section 6.6: As proposed in response to MassDEP Comments 7 and 8 on the draft remedial investigation report, the revised report should include a discussion of the possibility of underestimating risks from individual release areas through use of whole site UCLs rather than maximum detected concentrations. This discussion is needed to capture an important general result from the remedial investigation: the Building 82 site does not consist of a single contaminant source and release area; rather, the site is complex, consisting of multiple sources and release areas separated by relatively non-impacted areas (refer to Comment 1). Accordingly, a remediation strategy that addresses the risks associated with each of the discrete source and release areas should be developed during the feasibility study.