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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I ON RESPONSE TO COMMENTS
REGARDING DRAFT AND FINAL VERSIONS LIMITED REMOVAL ACTION COMPLETION
REPORT FOR SOIL EXCAVATION AT REVIEW ITEM AREA 110 NAS SOUTH WEYMOUTH
MA
03/30/2009
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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

March 30, 2009

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

Re: Responses to EPA Comments on the Draft Limited Removal Action Completion Report for the Soil Excavation at RIA 110 – Southeast Radio Antenna Area and the Final Limited Removal Action Completion Report for Soil Excavation at RIA 110 – Southeast Radio Antenna Area

Dear Mr. Helland:

EPA reviewed the responses to our comments on the *Draft Limited Removal Action Completion Report for the Soil Excavation at RIA 110 – Southeast Radio Antenna Area*, dated December 19, 2008. The responses were submitted in March 2009. EPA also reviewed the *Final Limited Removal Action Completion Report for Soil Excavation at RIA 110 – Southeast Radio Antenna Area*, dated March 4, 2009. EPA reviewed the document for incorporation of our comments on the *Draft Limited Removal Action Completion Report for Soil Excavation at RIA 110*, dated December 12, 2008.

Comment 1 EPA indicated that confirmatory sample data from antenna poles 3 and 4 were not presented in the report and recommended that the report show the confirmatory data with an explanation of how the data were evaluated to conclude that the clean-up was complete. The confirmatory sample data have been added as Tables 2-2 and 2-3. The response indicates that the evaluation of the data is deferred to the Decision Document. This approach is acceptable. If the evaluation of data in the Decision Document shows that concentrations do not pose unacceptable risk (EPA acceptance of this evaluation is pending), the removal at RIA 110 can be considered complete. Please add a sentence to the Completion Report referencing the Decision Document, to show that the confirmatory data have been evaluated.

Comment 2 EPA sought details about the level of habitat destruction (acreage in upland and wetlands, measures to minimize disturbance, vegetation destroyed) and plans for habitat restoration. The response states that "limited habitat destruction occurred." EPA would like to confirm the extent of habitat destruction and consider the need for any restoration in addition to the planned grade sloping.

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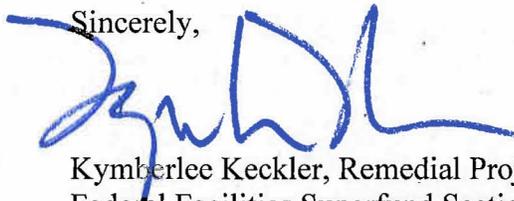
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Comment 3 This comment has been addressed. If the completion report will be otherwise revised, please add the information in the response to Section 2.0 (that the biologist did not locate any turtles within the work areas during the initial survey, that the work area and areas where turtles may have been were physically separated, that field personnel walked the site daily to ensure that no turtles were present, and that no turtles were harmed during any of the site activities). If no other changes to the report are required, this item does not warrant a rewrite of the entire document, as the information is included in the response.

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,



Kimberlee 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