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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING FINAL BASEWIDE
HIGHER TROPHIC LEVEL ECOLOGICAL RISK EVALUATION TECHNICAL MEMORANDUM
NAS SOUTH WEYMOUTH MA
03/26/2009
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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

March 26, 2009

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

Re: Final Basewide Higher Trophic Level Ecological Risk Evaluation Technical Memorandum and the response to EPA comments following the August 18, 2008 meeting

Dear Mr. Helland:

EPA reviewed the *Final Basewide Higher Trophic Level Ecological Risk Evaluation Technical Memorandum, Naval Air Station South Weymouth, Weymouth, Massachusetts*, dated February 2009 and the response to EPA comments following the August 18, 2008 meeting (EPA letter dated September 2, 2008), dated February 27, 2009. The Final ERA was reviewed for incorporation of EPA comments on the September 2007 Draft ERA.

Appendix I addresses General Comment 1 with an evaluation of non-PBT metals ingested with soil or sediment. In this new information, EPA discovered errors in the HQ calculations for the non-PBT COPCs:

1) Please provide references for the TRVs in Table 4 of Appendix I. The TRVs have mostly been taken from Sample *et al.* (1996). Please use the TRVs presented in the EPA EcoSSLs, preferentially.

2) Please review the calculations for the raccoon (Table 7). The potential daily doses seem to be about twice what they should be. For example, for antimony, uptake should be calculated as follows:

$$\begin{aligned} \text{Potential daily dose} &= \text{EPC} \cdot \text{IR}_{\text{sed}} \cdot \text{ED} \cdot \text{AUF} / \text{BW} \\ &= 18.9 \text{ mg/kg} \cdot 0.0144 \text{ kg/d} \cdot 1 \cdot 1 / 5.7 \text{ kg} \\ &= 4.77\text{E-}02 \text{ mg/kg-d} \end{aligned}$$

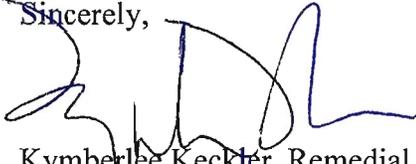
The value presented in Table 7 is 8.95E-02 mg/kg-d. Please review the calculations and submit an errata sheet.

In Specific Comment 21 (Appendix D, p. 9 of 17, Hexachlorobenzene), EPA noted that the description of the derivation of TRVs were not consistent with the associated text. In the Final ERA, the text has not been corrected (*see ¶¶2&3* under hexachlorobenzene). Likewise, in Specific Comment 22 (Appendix D, p. 9 of 17, Hexachlorobenzene), EPA requested that the mammalian toxicity test be cited in the second paragraph and that the body weight and ingestion rate used to calculate the dose be provided. This comment has not been incorporated.

The paragraph at the top of page 4-3 in Section 4.1 summarizing HQs for the American woodcock lists a LOAEL-based HQ of 28.3 for the average cadmium EPC. This is not correct. The NOAEL-based HQ was 28.3 and the LOAEL-based HQ was 6.56. Please correct.

I look forward working with you and the Massachusetts Department of Environmental Protection to complete the decision document for French Stream. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kimberlee Keckler', written over a horizontal line.

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