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NAS SOUTH WEYMOUTH
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LETTER REGARDING U S EPA REGION I REVIEW OF FIELD REPORT FOR DATA GAP
INVESTIGATION AT REVIEW ITEM AREA 62 NAS SOUTH WEYMOUTH MA
07/08/2009
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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

July 8, 2009

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

Re: Field Report for Review Item Area 62 – Spruce Street Extension Data Gap Investigation

Dear Mr. Helland:

Thank you for the opportunity to review the Field Report for Review Item Area 62 – Spruce Street Extension, Data Gap Investigation, Naval Air Station South Weymouth, Weymouth, Massachusetts, dated June 2009. The Field Report presents the results of the sampling and analysis of six sediment locations in French Stream in the Spruce Street Extension area. The sample locations, analytes, analytical methods, and screening benchmarks are consistent with the March 2009 Data Gap Sampling Plan and subsequent agreements (*i.e.*, adjusting the sample locations to target depositional areas).

The data suggest that the elevated PAH concentrations in samples collected from 2004 are localized. The 2009 concentrations were generally lower than previous samples and benchmarks and SOWEY background UPLs. Although EPA supports the recommendation for no further action at the Spruce Street Extension, the nature of the sediment samples should be described. While it is understood that depositional locations were targeted, the sample substrate should be described, with an explanation of the grain size results, to confirm that the appropriate material was sampled.

Although they do not affect the conclusions, there are two items that should be revealed:

- 1) The Field Report states that averages of site sample concentrations with duplicate concentrations were compared to benchmarks and background. Generally, this is not an appropriate step for risk screening. In this case, however, given that the concentrations in the original sample and the duplicate were similar and were both low, averaging the two does not affect COPC selection.
- 2) The 2004 PRGs were used as human health risk benchmarks. While the updated Regional Screening Values are preferable, as noted in EPA's comments on the Data Gap Sampling Plan, the use of the older benchmarks did not result in any new COPCs. Therefore, in this case, the use of the older screening values is acceptable.

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In Section 3.0, please discuss the differences for SEM and AVS between the two sample dates.

Table 3 indicates that all samples exceed the ecological benchmark for total organic carbon. Please identify the source of this benchmark, as EPA is unaware of any such benchmark. If the source of the benchmark is unknown, please delete it from Table 3 and change the shading.

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,



Kymberlee 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