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EMAIL AND THE U S EPA REGION I COMMENTS ON THE DRAFT REMEDIAL ACTION
WORK PLAN INDUSTRIAL OPERATIONS AREA FORMER NAS SOUTH WEYMOUTH MA
04/26/2016
U S EPA REGION I BOSTON MA

South Weymouth
IOA

Helland, Brian J CIV NAVFAC MIDLANT, EV

From: Keating, Carol <Keating.Carol@epa.gov>
Sent: Tuesday, April 26, 2016 18:45
To: Barney, David A CIV NAVFACHQ, BRAC PMO; 'Chaffin, David (DEP)'; Helland, Brian J CIV NAVFAC MIDLANT, EV; Corbett, Brian
Cc: O'Connor, Laurie; Young@southfieldra.com
Subject: [Non-DoD Source] RE: IOA - Remedial Action Work Plan
Attachments: SOWEY - IOA EPA Comments on the Draft RA Work Plan 042616.docx

Dave/Brian,

EPA's comments on the above-referenced document are attached. Please feel free to contact me with any question/concerns.

Carol A. Keating
Remedial Project Manager
Federal Facilities Superfund Section
Office of Site Remediation and Restoration

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-----Original Message-----

From: Barney, David A CIV NAVFACHQ, BRAC PMO [mailto:david.a.barney@navy.mil]
Sent: Monday, April 25, 2016 11:00 AM
To: 'Chaffin, David (DEP)' <david.chaffin@state.ma.us>; Helland, Brian J CIV NAVFAC MIDLANT, EV <brian.helland@navy.mil>; Corbett, Brian <Brian.Corbett@tetrattech.com>
Cc: Keating, Carol <Keating.Carol@epa.gov>; O'Connor, Laurie <Oconnor.Laurie@epa.gov>; Young@southfieldra.com
Subject: RE: IOA - Remedial Action Work Plan

Thanks Dave,

Carol, can you let me know when we can expect your comments? We are assembling data from recent sampling activities and plan to have draft report by May 20th.

r/Dave

-----Original Message-----

From: Chaffin, David (DEP) [mailto:david.chaffin@state.ma.us]
Sent: Friday, April 15, 2016 10:58 AM
To: Helland, Brian J CIV NAVFAC MIDLANT, EV; Barney, David A CIV NAVFACHQ, BRAC PMO; Corbett, Brian
Cc: Keating, Carol; O'Connor, Laurie; Young@southfieldra.com
Subject: [Non-DoD Source] IOA - Remedial Action Work Plan

Comments on the draft Remedial Action Work Plan for Industrial Operations Area, received March 21, 2016:

1. The plan was submitted prior to submitting the results from the recently undertaken pre-design investigation. Consequently, MassDEP comments on the plan are preliminary and subject to revision following receipt and review of the pre-design investigation results.
2. Section 2.3, Page 4, Second Paragraph: The parenthetical list of impacted EUs in the center of the site should include EU 28 (e.g., refer to ROD Figure 2-3).
3. Section 2.3 and Appendix F, Worksheet 10: The list of contaminants that exceeded cleanup goals may have to be amended to include PFCs, depending on the results from the pre-design investigation.
4. Table 3-1 and Appendix F, Worksheet 10: The cleanup goal for arsenic should be changed to 6.7 mg/kg (ROD Table 2-7).
5. Section 4.3 and Appendix F, Worksheet 17: To adequately confirm adequate removal in the larger removal areas and accommodate plan modifications that could result from the pre-design investigation, a floor area sample frequency criterion should be specified (the EUs were established for the purpose of screening, not remediation). MassDEP suggests one sample per 625 square feet (i.e., one sample per 25-foot by 25-foot square), which is consistent with the proposed 25-foot sidewall sample interval and would provide a reasonable representation of a residential play area or garden.

David Chaffin

Massachusetts Department of Environmental Protection

617-348-4005

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**EPA Comments on the
Draft Remedial Action Work Plan
Industrial Operations Area
Former Naval Air Station, South Weymouth, Massachusetts
March 2016**

1. Page 3, Section 2.3, 2nd, ¶, 1st sentence - Please insert a reference (i.e. author and date) for the “Industrial Operations Area Technical Memorandum” and ensure that it is included in Section 10. In addition, please clarify the relationship between the IOA Technical Memorandum and the IOA Project Report (which is unclear based on discussions on the preceding page and subsequent paragraph).
2. Page 3, Section 2.3, 4th ¶, 1st sentence - While it the Technical Memorandum may have concluded that groundwater was not a media of concern (i.e. based on analytical results for contaminants of concern identified in the IOA ROD), recent sampling performed in conjunction with the Hangar 1 remedial investigation (RI), revealed PFCs in IOA groundwater above EPA’s Provisional Health Advisories (PHAs). As such, additional soil and groundwater samples from within the IOA will be collected to define the extent of PFC contamination and identify potential source areas, if any, prior to site closeout/transfer.
3. Page 4, Section 2.3, 3rd ¶ – For reasons explained in the preceding comment, please insert the following at the end of the last sentence, “However, recent sampling performed in conjunction with the Hangar 1 RI revealed PFCs in IOA groundwater above EPA’s PHAs. Additional soil and groundwater samples from within the IOA will be collected to define the extent of PFC contamination and identify potential source areas, if any.”
4. Pages 4 and 5, Section 2.3, last and first ¶ – Please delete the discussion of contaminants identified in site media since they are included in the (revised) Table 3-1 on the proceeding page (and since issues related to additional dioxin analyses have been resolved).
5. Page 5, Section 3.1, 2nd ¶ - For consistency with the IOA ROD, please amend the RAO text to read, “Prevent human exposure (i.e. direct contact or ingestion) to COCs in soils exceeding risk-based cleanup goals.
6. Page 6, Table 3-1 – Please delete the current Table 3-1 and replace it with Table 2-7 from the September 2015 IOA ROD.
7. Page 9, Section 4.2, 1st ¶, second to last sentence – Please amend the sentence to read, “Preliminary dimensions of the soil remedial actions areas, as defined by pre-design investigation sampling performed by Resolution Consultants, will be provided in Appendix E. Final dimensions of the soil remedial action areas will be determined upon completion of post-excavation, confirmatory sampling activities and will be presented in the draft IOA Remedial Action Completion Report (RACR).
8. Page 9, Section 4.2, 4th ¶, last sentence – Please confirm that confirmation sampling will be performed post soil excavation and rail spur remnant removed, prior to restoration of Areas 7 and 9.

9. Page 10, Section 4.2.1, 5th bullet – Please elaborate on the classification of “very large” and “questionable debris”. Specifically, how do the dimensions or description of “minor” debris differ from that classified as “very large” or “questionable”?
10. Page 10, Section 4.2.1, 7th bullet – Please confirm that the stockpiled soil pile will be located within the area of temporary fencing to prevent trespasser access (see comment 12. below).
11. Page 10, Section 4.2.1, 9th bullet – Please confirm that confirmatory samples from EUs near confirmed PFC detections in soil and groundwater will be submitted for PFC analysis.
12. Page 10, Section 4.2.1, last bullet – Please confirm that the temporary fencing will be effective at preventing trespasser access, specifically neighboring children.
13. Page 10, Section 4.3 – In addition to “ensuring that cleanup goals are achieved”, soil confirmation sampling is necessary to confirm completion of the selected remedial action. Since confirmation soil samples must be representative of the entire excavation (i.e. base and each of the sidewalls), the final number of samples to be collected should correlate directly to the size (i.e. area of base (ft.²) and total linear feet of sidewall) of the excavation. Specifically, one floor sample should be collected every 500 ft.² and one sidewall sample every 100 linear feet. As such, the number of confirmatory soil samples that should be collected from each area is as follows:

- Area 1 - 4 floor; 6 sidewall (1 each 30’ side; 2 each 60’ side)
- Area 2 - 1 floor; 1 sidewall (each side)
- Area 3 - 1 floor, 1 sidewall (each side)
- Area 4 - 1 floor, 1 sidewall (each side)
- Area 5 - 4 floor, 4 sidewall (2 each 50’ side)
- Area 6 - 4 floor, 4 sidewall (2 each 50’ side)
- Area 7 - 8 floor, 10 sidewall (2 each 50’ side; 3 each 100’ side)
- Area 8 - 1 floor, 1 sidewall (each side)
- Area 9 - 2 floor, 10 sidewall (1 each 50’ side; 4 each 150’ side)
- Area 10 - 1 floor, 1 sidewall (each side)

In addition, samples should be biased or collected from areas (or depths for sidewall samples) where the highest concentrations would be expected, based on prior investigations, visible contamination, or soil type/characteristics. To demonstrate compliance with cleanup levels, each sample result should be compared to the cleanup level for each constituent identified for remediation. If cleanup levels are exceeded at any single location, additional excavation will be required and additional soil confirmation samples should be collected within the areas of additional excavation until compliance with the cleanup levels is attained.

Please ensure that subsequent discussions of confirmatory soil sampling procedures are amended, as/if warranted, to reflect the above-referenced requirements.

14. Page 10, Section 4.3, 1st sentence – Please insert “ROD-specified RAOs and” prior to “cleanup goals”.

15. Appendix C, Page 4, Section 1.3 – Please omit reference to “Removal Action Objective (RAO)” in the first sentence (or change to “Remedial Action Objective”) consistent with the September 2015, Record of Decision (ROD). In addition, for consistency, all reference to “removal” should be omitted from this section since the excavation of contaminated soil at the former IOA site is being performed as a CERCLA *remedial*, not *removal*, action. With that being said, all waste streams generated during the implementation of the CERCLA remedial action at the IOA should be managed in accordance with all applicable federal, state and local laws and regulations.

Please ensure that this change is made throughout the document, including but not limited to, Appendix F.

16. Appendix D – The table of “Estimated Remedial Areas and Quantities for the IOA” should be amended (by adding a footnote or some other means) to indicate that the depth of each excavation is approximately two feet. While calculations for total soil volume excavated from each area appear to be correct (using the estimated two foot depth for each excavation referenced in Section 4.2.1), the results are unsupported by the excavation dimensions (length and depth) currently provided.
17. Appendix D - Since the number of confirmatory samples to be collected from each area should correlate to the size of the specific excavation, a column specifying the number of confirmatory samples to be collected from each Area/EU (see comment 13) should be added to the table.
18. Appendix D - For consistency with the IOA ROD, please include the applicable “EU” number in the Remedial Action Area # column (i.e. Area 1 = EU 8, Area 2 = EU 15)
19. Appendix D - Consistent with Section 2.12 of the IOA ROD, the “COC” column should include all of the COCs previously detected in a specific area (i.e. EU), not just “risk drivers”.
20. Appendix F, Page 15, CSM – Please ensure that the CSM discussion provided is consistent with that presented in Section 2.0 of the September 2015 IOA ROD.
21. Appendix F, Page 16, CSM – Please delete the “summary of cleanup goals” inserted at the bottom of the page and replaced it Table 2-7 (Page 38) in the ROD.
22. Appendix F, Page 21, CSM, 1st ¶ -.As stated in comment 13 above, confirmation soil samples must be representative of the entire excavation (i.e. base and each of the sidewalls) and correlate to the specific size of the excavation (i.e. larger excavation, larger number of samples). In addition, sample locations should not be “randomly” selected, as proposed. They should be “biased” or collected from areas (or depths for sidewall samples) where the highest concentrations would be expected, based on prior investigations, visible contamination, or soil type/characteristics.
23. Appendix F, Page 21, CSM, 1st ¶ - The last two sentences should be revised to reflect the fact that confirmation soil samples must be analyzed for all of the COCs previously detected in

the excavation area and not just “risk drivers”. As stated previously, EPA cannot concur on a remedial action completion decision if confirmatory sample data is unavailable for all COCs previously identified in a specific EU. As stated in comment 13 above, to demonstrate compliance with cleanup levels, each sample result should be compared to the cleanup level for each constituent identified for remediation. If cleanup levels are exceeded at any single location, additional excavation will be required and additional soil confirmation samples should be collected within the areas of additional excavation until compliance with the cleanup levels is attained.

24. Appendix F, Pages 35 - 37, CSM – Please include “Reference Limits and Evaluation Tables” for all relevant COCs (not just “risk drivers”). See comments 13 and 23 above.