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NAS SOUTH WEYMOUTH
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EMAIL AND ATTACHED U S EPA REGION I COMMENTS ON THE REMEDIAL ACTION
COMPLETION REPORT FOR BUILDING 82 FORMER NAS SOUTH WEYMOUTH MA
10/13/2015
U S EPA REGION I BOSTON MA

South Weymouth
Site 10

Helland, Brian J CIV NAVFAC MIDLANT, EV

From: O'Connor, Laurie <Oconnor.Laurie@epa.gov>
Sent: Tuesday, October 13, 2015 11:55
To: Barney, David A CIV NAVFACHQ, BRAC PMO; Helland, Brian J CIV NAVFAC MIDLANT, EV
Cc: Keating, Carol; Chaffin, David (DEP); Snyder, Michelle
Subject: SOWEY - EPA Comments on Building 82 RACR
Attachments: SOWEY - Bldg82 EPA Comments RACR dated June 24, 2015.docx

Hi –

Please see the attached document for EPA's comments on the Building 82 Remedial Action Completion Report, dated June 24, 2015.

Thank you and please let me know if you have any questions.

Laurie O'Connor, P.E.

Brownfields Project Officer

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**EPA COMMENTS ON THE
REMEDIAL ACTION COMPLETION REPORT
FOR BUILDING 82
FORMER NAVAL AIR STATION SOUTH WEYMOUTH (dated JUNE 24, 2015)
Weymouth, Massachusetts**

General Comments:

1. Land Use Controls need to be implemented in order to attain the Response Action Outcomes (RAOs) identified in the Record of Decision (ROD). In order for the Remedial Action Completion Report (RACR) to be finalized, the final Land Use Control Implementation Plan (LUCIP) and final Long-Term Monitoring Plan (LTMP) must be issued.
2. Recent results from the July 2015 (15-month post-injection) groundwater sampling event should be incorporated into the RACR.

Specific Comments:

1. Page 6, Section 2.4, In-Situ Chemical Oxidation Injection Operations. The permanganate release into the drain system that occurred during the injection activities and the response actions conducted need to be summarized within this section.
2. Page 10, Section 2.6.1, TCE Area. Please include the July 2015 groundwater sampling results in the discussion within this section.
3. Page 14, Section 3.0, Demonstration of Completion. The last sentence of this section states that the “remedy has attained each of the RAOs identified in the ROD”. RAOs for the Building 82 Site, identified within the ROD, are:
 - Prevent human exposure to groundwater containing concentrations of contaminants in excess of the remedial goals that cause acceptable risk.
 - Prevent or minimize migration of contaminants in groundwater.
 - Restore groundwater quality at the Building 82 Site such that there are no risks to human health preventing its permissible beneficial use.

In addition to in-situ chemical oxidation (ISCO) and long-term monitoring of groundwater, the selected remedy in the ROD also specified interim LUCs to prevent groundwater extraction for production, supply, or irrigation, as well as a requirement for regulatory approval of dewatering plans. Since the LUCIP has not been finalized, it is premature to state that the RAOs have been attained. The LUCIP and LTMP must be

finalized before EPA can concur with an OPS determination and approve the RACR for the Building 82 Site.

4. Figure 2-2. Injection well PT-I1D is shown with yellow symbol, indicating that it received oxidant. EPA believes this is an error on the figure.