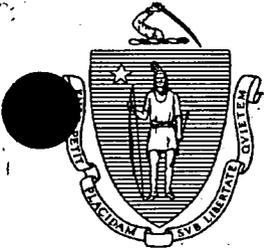


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Mr. Mark Leipter
c/o Commanding Officer (Code 1822/MXL)
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop #28
Lester, Pennsylvania 19113

Re: EBS Sampling Work Plan Addendum
South Weymouth Naval Air Station
RTN No. 3-2621
January 6, 2000

Dear Mr. Leipter:

The Department received and partially reviewed the draft *EBS Sampling Work Plan Addendum No. 1, dated November 12, 1999* (received on December 22, 1999). A full review could not be completed because the proposed workplan addendum is based on Phase II EBS sampling results that have not been submitted to the Department. Consequently, the Department will defer complete review of the addendum until the existing Phase II sampling results are submitted. In the meantime, the Department is providing general comments and recommendations to ensure progress.

General Comments

1. The workplan addendum presents a proposal to conduct sampling in three EBS Review Item Areas (RIAs) that were sampled during the fall of 1998 under the approved EBS Sampling Work Plan. The stated rationale for conducting additional sampling is based on the results from the 1998 samples. However, the addendum does not include or cite previously submitted documents that provide validated analytical results from the 1998 samples, nor does the addendum include or cite previously submitted supporting field data (e.g., boring logs, sample records, and screening results). The Department acknowledges receipt of "Field Reports" last spring, and tables of validated analytical data were subsequently transmitted electronically; however, the field reports did not include validated analytical results, and the validated tables included errors which cast doubt on their reliability. The Department cannot fully review the addendum until the results from the 1998 sampling are submitted.

2. The sampling objectives and current status (i.e., Site Screening Area or Area of Concern) of each of the RIAs are not clear in the addendum. Section 2 indicates the purpose of the proposed sampling is to obtain data necessary to support human and/or ecological risk assessment and to determine the nature and extent of contamination. These objectives are consistent with the evaluation of AOCs. However, Sections 3.1.1, 3.2.1, and 3.3.1 indicate

that the analytical results will be used for screening purposes, which indicates that the Navy has not reached a decision that these RIAs are AOCs.

Recommendations

In order to facilitate and expedite cleanup and transfer of base property, the Department recommends that:

1. Results from the 1998 Phase II EBS sampling conducted in the three RIAs, including validated analytical data, boring logs, sample records, and screening results, be submitted in draft EBS decision documents. The decision documents will: (1) document the results from the 1998 sampling work, (2) document the screening decisions for these RIAs so that they can move forward in the regulatory process (exceedances of benchmarks noted in Sections 3.1.1, 3.2.1, and 3.3.1 indicate that the Navy has concluded that these RIAs are AOCs), (3) complete the related portion of the EBS Report (which can consist of the decision documents generated for each RIA included in the EBS), and (4) avoid preparation of additional EBS workplan addendums if other RIAs are determined to be AOCs.
2. Separate AOC workplans be prepared for each of the RIAs (and other RIAs determined to be AOCs) to facilitate site-by-site BCT review and to distinguish these workplans, which should yield CERCLA RODs via a removal action or an RI/FS, from the Phase II EBS workplan, which should yield an EBS report consisting of the screening decision documents prepared for each RIA.
3. EBS decision documents be jointly reviewed by the BCT prior to generating workplans for AOCs to minimize the time and effort expended to prepare the workplans.

If you have any questions about this letter, please contact David Chaffin, Project Manager at (617) 348-4005.

Very truly yours,


Anne Malewicz
Bureau of Waste Site Cleanup
Federal Facilities Section Chief

CC: RAB Members
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