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LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING DRAFT PERFLUORINATED COMPOUNDS IN GROUNDWATER PROJECT REPORT REVIEW ITEM AREA 11 NAS SOUTH WEYMOUTH MA
08/18/2010
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF MASSACHUSETTS
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DEPARTMENT OF ENVIRONMENTAL PROTECTION
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IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

Mr. Brian Helland, RPM
BRAC PMO, Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Perfluorinated Compounds Report
RIA 11 (AAAF Spills)
Former South Weymouth NAS
RTN 4-3002621
August 18, 2010

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, reviewed the draft *Perfluorinated Compounds in Groundwater Project Report* for Review Item Area 11, dated July 2010. Comments are attached.

If you have any questions about the comments, I can be reached at (617) 348-4005.

Sincerely,

D. Chaffin

David Chaffin
Federal Facilities Project Manager
Bureau of Waste Site Cleanup

cc: D. Barney, USN-S. Weymouth
P. Marchessault, USEPA
Chief Executive Officer, SSTTDC
RAB Members

MASSDEP COMMENTS ON
DRAFT PERFLUORINATED COMPOUNDS PROJECT REPORT
REVIEW ITEM AREA 11
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
AUGUST 18, 2010

1. Section 3.2: While the lack of enforceable standards and toxicity criteria complicates assessment of the perfluorinated compounds (PFCs) detected in the groundwater samples collected during this investigation, the Navy should nevertheless manage the uncertain risks posed by these compounds using an approach that is protective of human health and the environment.

   In the near-term, action is necessary to prevent human and ecological contact with the detected compounds. In particular, action is needed to ensure that any construction activities in the vicinity of Hangar 1 will be conducted using an approach that will prevent worker exposure to soil and groundwater contaminated by these compounds. This can be accomplished by confirming that the limits of contamination do not extend into planned construction area before construction begins or by coordinating with construction personal to delineate and safely manage contaminated soil and groundwater during construction (e.g., procedures used during Phase I access road construction).

   For the intermediate term, a plan should be developed to manage the impacted soil and groundwater in a manner that is protective of human health and the environment until the risks posed by PFCs can be quantified and addressed using established practices. In particular, while the question of whether of not a cleanup is necessary is uncertain at present, there can be no doubt that the full extent of contamination in soil and groundwater should be determined to develop a protective management approach (e.g., notice or land use control). The following actions are recommended to delineate the extent of contamination in soil and groundwater:

   a) Hangar 1: An investigation should be conducted to locate PFCs source areas and determine the magnitude and extent of contamination in soil, and the extent of PFCs in groundwater exceeding the provisional criteria should be delineated (existing groundwater data may be sufficient); and

   b) FFTA: Surface water sampling should be conducted to determine if PFCs extend from the FFTA to the east branch of French Stream, and if so, to determine the downstream extent, and the extent of PFCs in groundwater exceeding the provisional criteria should be delineated (existing groundwater data may be sufficient).

   For the long-term, it is expected that appropriate standards and toxicity criteria (e.g., CSF and/or RfD) will eventually be established for the detected PFCs and related PFCs. When this occurs, risks should be quantified and if necessary a permanent remedy should be implemented.

2. Appendix A-1: The map provided in this appendix associates monitoring well identifiers MW05-302 and MW05-304 with different locations than shown in Figures 2, 3, and 4 of the report. Please confirm that the labels shown in Figures 2, 3, and 4 are correct.

3. Records should be reviewed to determine if aqueous film forming foam was stored or used at Building 82, and if so, the potential for past migration of PFCs from Building 82 to surrounding environmental media should be assessed.