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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT FINAL
REMEDIAL ACTION COMPLETION REPORT FOR AREA OF CONCERN 55C NAS SOUTH
WEYMOUTH MA
03/21/2011
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

March 21, 2011

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

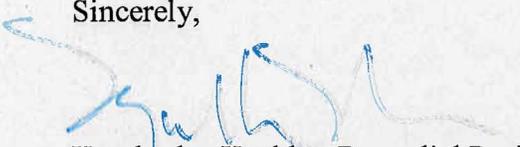
Re: Draft Final Remedial Action Completion Report for Area of Concern 55C

Dear Mr. Helland:

Thank you for the opportunity to review the *Draft Final Remedial Action Completion Report for Area of Concern 55C* at the Naval Air Station South Weymouth dated March 2011. The document presents the results and the documentation for the removal action completed at the subject site. All of Navy's responses to EPA's comments have been incorporated into the draft final RACR. The post-excavation survey and as-built drawings have not yet been completed but will be included in the Final RACR according to Navy. Detailed comments are provided in Attachment A.

I look forward working with you and the Massachusetts Department of Environmental Protection to select a final remedy for Area of Concern 55C. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Dave Barney, USN, South Weymouth, MA
Dave Chaffin, MADEP, Boston, MA
Kevin Donovan, SSTTDC, South Weymouth, MA
Phoebe Call, TTNUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 3-5, §3.2.9	The second sentence in the partial paragraph at the top of the page is not correct – only one location had an initial excavation depth greater than 2.0 feet (<i>i.e.</i> , sample location FLR-023). Please correct.
p. 3-5, §3.3	Please correct the second last paragraph to read: “... the organic criteria for the project and therefore was selected.”
p. 4-3, §4.6	There are two areas in Figure 3 denoted as deeper excavations; therefore, please revise the text in the first sentence to reference Grid 023/FLR-023. Also revise the text in this paragraph to better explain that the second deeper planned excavation was located within Grid 021 and that the excavation depth requirement was satisfied by a series of two sequential excavations to a total depth of 3.5 to 4.0 feet bgs.
p. 4-4, §4.10	Please correct the reference in the first sentence from Grid 022 to Grid 021 to be consistent with the changes made in the other subsections of Section 4.0. Delete the comma following this sentence. Edit the depth reference in the second sentence to 3.5 to 4.0 feet to be consistent with earlier descriptions.
Table 2	<p>This table is not consistent with the text in Section 3.2.3.</p> <p>a) Samples M89218-1 through M89218-5 are all said to have been collected on February 8, 2010 but the text states that two samples were collected <i>in situ</i> before excavation and two samples were collected from the soil stockpiles after completion of 50% of the excavation work. Four additional samples from soil stockpiles were collected after the excavation was substantially complete (February 19, 2010 per the table; however, Section 4.0 indicates that samples with exceedances were excavated from late February until mid-April which appears to contradict the “substantially complete” excavation condition). Also, there is no information in the RACR to correlate sample results with their respective samples (<i>i.e.</i>, <i>in situ</i>, 50% excavation, 100% excavation). Please edit the text and table to resolve these concerns and provide proper identification for the waste characterization samples.</p> <p>b) The list of analytes presented in Section 3.2.3 is not consistent with the analytes listed for each sample in Table 2. It appears that some of the data has inadvertently been omitted from some or all of the samples.</p> <p>c) Based on the discussion in Section 3.2.3 it is assumed that samples M89218-1 and M89218-1A are not related. Sample M89218-1A appears to be the TCLP sample referred to in Section 3.2.3. Please confirm.</p> <p>d) It is not apparent why the analyte list for M89218-1 is so short; that does not appear to be consistent with the text in Section 3.2.3.</p> <p>e) It is not apparent what samples M89404-1 through M89404-3 relate to. The text in Section 3.2.3 does not refer to any group of three samples. Also the analyte list</p>

for these samples appears incomplete. Please clarify the context for these samples.

f) If the table notes are meant to refer to the qualifier column of the table, the case of the letters should be made consistent with the case used in the notes. Also, it appears that notes *a* and *c* have not been used and should be deleted.

Figure 3

This revised figure shows “Location of Existing Mound” in the center of the vernal pool. This feature is not shown in Figure 2, the existing conditions plan. Is this note intended to mean that the mound was created during the removal action and now currently exists, whereas it did not exist prior to the removal action? Please clarify.