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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING ACTION
MEMORANDUM FOR AREA OF CONCERN 55C DEBRIS AREA NORTH OF TROTTER
ROAD NAS SOUTH WEYMOUTH MA
01/07/2010
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

January 7, 2010

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

Re: Action Memorandum for AOC-55C

Dear Mr. Helland:

EPA reviewed the *Action Memorandum for Area of Concern 55C Debris Area North of Trotter Road* at the Naval Air Station South Weymouth, dated December 2009. The document presents the decision to conduct a removal action in accordance with the Engineering Evaluation/Cost Analysis (EE/CA) dated December 2009. Since EPA records AOC55C as Operable Unit 22, please add this to subsequent documents. EPA reviewed the Action Memorandum for consistency, technical accuracy, completeness, and compliance with EPA's recommended Action Memorandum format. 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 AOC55C. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kymberlee Keckler".

Kymberlee 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, §4b	Please edit the listing for the EE/CA to reference the Final EE/CA dated December 2009.
p. 4, §7	The endangerment determination refers to hazardous substances. Presumably this was done because, based on contaminant concentrations (lead and cadmium), the presence of characteristically hazardous material is possible. If that is not the case, the language should refer to pollutants and contaminants instead. While the EE/CA assumes that characteristically hazardous material is not likely to be present based on the contaminant concentrations, it is not apparent that TCLP testing has been done to support this contention.
p. 5, §8a	Please expand the partial paragraph at the top of the page to indicate that wetland monitoring will be conducted periodically following wetland restoration to ensure that the restoration is completed successfully.
p. 6, §8a	Please add another task following site restoration that describes the wetland monitoring that will be conducted following restoration to ensure that the restoration is completed successfully.
p. 6, §8d	The list of ARARs is not complete as compared to the list presented in the Final EE/CA, including the omission of the Massachusetts Solid Waste Management Regulations. Please correct as appropriate.
p. 7, §8f	Please edit the last sentence to acknowledge that wetland monitoring will be conducted for a limited time to ensure that the restoration has been successfully completed.