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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT RECORD OF DECISION FOR AREA OF CONCERN
HANGAR 1 NAS SOUTH WEYMOUTH MA
06/01/2010
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION



COMMONWEALTH OF MASSACHUSETTS
 EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
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TIMOTHY P. MURRAY
 Lieutenant Governor

LAURIE BURT
 Commissioner

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

Re: Draft Record of Decision
 Area of Concern Hangar 1
 Former South Weymouth NAS
 RTN 4-3002621
 June 1, 2010

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, reviewed the draft *Record of Decision, Area of Concern Hangar 1, Main Hangar Floor Drains, Naval Air Station South Weymouth, Weymouth, Massachusetts*, dated May 2010. Comments are attached.

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

Sincerely,

David Chaffin
 Federal Facilities Project Manager
 Bureau of Waste Site Cleanup

cc: D. Barney, USN-S Weymouth
 K. Keckler, USEPA
 Executive Director, SSTDC
 RAB Members

A. Maliewicz, MassDEP-Boston

**MASSDEP COMMENTS ON
DRAFT RECORD OF DECISION
AREA OF CONCERN HANGAR 1
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
JUNE 1, 2010**

1. Section 2.1, Second Paragraph: To avoid potential confusion about the extent of AOC Hangar 1, text should be clarified to indicate that AOC Hangar 1 consists of subsurface soil contaminated by chemicals released from the main hangar bay floor drain systems.
2. Section 2.7.1, Paragraph Following Table 2-3: To clarify language, the twice-cited term "target levels" should be defined or replaced with a defined term (e.g., "acceptable risk range").
3. Table 3-1: The summary of comments presented in the left column should be modified to more accurately represent ARAWH's concerns. For example, the summary does not address the concern expressed in the first bullet point of ARAWH's letter (non-cancer risk exceeding an HI of 1), and the concern expressed in the second bullet point (cancer risk exceeding MCP risk threshold) was divided and presented as two separate concerns.
4. Table 3-1: The responses presented in the right column are inadequate to address the concerns raised by ARAWH. Rather than relying on EPA and MassDEP acceptance of the risk assessment to address these concerns, the responses should provide technically defensible explanations for each of the concerns. For example, the apparent conflict between the proposed decision for no further action and the reported exceedance of the MCP cancer risk threshold could be addressed by explaining that a no further action decision would be acceptable under the MCP if a Method 1 risk assessment using the S-1/GW-1 standards had been conducted.