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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I ON RESPONSE TO COMMENTS
REGARDING LANDFILL GAS SAMPLING PLAN AND REVISED LANDFILL GAS SAMPLING
PLAN OPERABLE UNITS 2 (OU 2) AND 9 (OU 9) NAS SOUTH WEYMOUTH MA
06/21/2010
U S EPA REGION I



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

June 21, 2010

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

Re: Response to EPA Comments on the Landfill Gas Sampling Plan and the Revised Landfill Gas Sampling Plan for the Rubble Disposal Area

Dear Mr. Helland:

Thank you for the opportunity to review the *Response to EPA Comments on the Landfill Gas Sampling Plan for Rubble Disposal Area*, dated May 2010 and the *Revised Landfill Gas Sampling Plan, Rubble Disposal Area*, dated June 2010. Except for an apparent copying error in the response to Letter Comment 2, EPA has no further comments on the responses to our comments dated May 20, 2010 on the Landfill Gas Sampling Plan for the RDA. In item #2 in the response to Letter Comment 2, the text should refer to the VOC signature from biogenic gas rather than the isotopic signature. This text was copied into the revised Landfill Gas Sampling Plan, so please make that correction on page 10 of the plan.

General Comment 1 on the Revised Landfill Gas Sampling Plan: It appears that Navy will rely on staking sampling locations and subsequently returning to the site to survey them. How will the Navy protect against the loss of staked locations from vandalism? Please collect GPS coordinates for sample locations when the samples are collected or otherwise permanently mark the sample locations in case the stakes are missing. These discussions are found near the top of pages 5 and 6.

Specific Comment 1: At the top of p. 7, the text is not consistent with Table 3 regarding the gas vents to be sampled. Based on the text on p. 9 under Permanent Gas Probes and Vents, it appears that Table 3 should list GV-06 rather than GV-02. Please review and correct as appropriate.

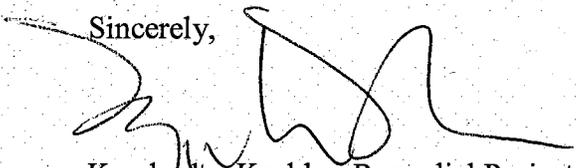
Specific Comment 2: In the middle of the page 13, the list of fixed gases includes isobutene. Please confirm this is correct and that the intent was not to list isobutane.

Specific Comment 3: Please add the eleven soil core samples that will be screened to Table 3.

Specific Comment 4: In Appendix B, SOP A-008, Sections 10.1.1 and 11.7 refer to Section 11.9, which does not exist. Should the reference be to Section 11.8? Section 11.8 refers to Figure 1, which was not provided. Please either include it or indicate why it is not needed.

I look forward working with you and the Massachusetts Department of Environmental Protection on the investigation and cleanup of the remaining sites. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberlee Keckler', written over a horizontal line.

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

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