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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT SAMPLING AND  
ANALYSIS PLAN FOR AREA OF CONCERN 55C GROUNDWATER INVESTIGATION NAS  
SOUTH WEYMOUTH MA  
07/20/2010  
U S EPA REGION I



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I**

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

July 20, 2010

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

Re: Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) for Area of Concern 55C, Groundwater Investigation

Dear Mr. Helland:

Thank you for the opportunity to review the Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Area of Concern 55C, Groundwater Investigation, Former Nava Air Station South Weymouth, dated June 2010. Detailed comments are provided in Attachment A. The Draft SAP QAPP provides the detailed for the approach outlined in the AOC 55C SAP – Data Quality Objectives document. The rationale for the investigation is clearly stated and piezometer locations, analyses, project action levels (PALs), are appropriate.

EPA reiterates one of its comments on the DQO document: Under Sampling Design and Rationale, the text notes that five piezometers will be installed downgradient of and within the debris field. The figure submitted with the April 8 meeting minutes only shows 1 piezometer (PZ-104) within the debris field and three downgradient (PZ-101 through 103), with a fifth (PZ-105) presumably upgradient. If the text is correct, that five are planned for within and downgradient of the debris field, please provide a revised figure showing the fifth sample location.

The document refers to PZ-105 as the presumed upgradient piezometer (*e.g.*, page 49 of 90). The report should clarify that this presumption will be confirmed with new water level data, which will also confirm the relative location of PZ-105.

I look forward working with you and the Massachusetts Department of Environmental Protection on the investigation and remediation 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 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, SSTDC, South Weymouth, MA  
Phoebe Call, TTNUS, Wilmington, MA

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 27 of 90, §10.4	The second full paragraph states that the ERA concluded that “elevated levels of metals in surface soil pose potential risk to terrestrial plants and invertebrates and wildlife.” According to the 2009 ERA, elevated risk to the Carolina wren was based on exposure to sediment. Please clarify.
p. 29 of 90, §10.5.4	The first paragraph states: “Exposure to surface water was not considered a route of human exposure.” It is unclear why this statement is included here because the surface water route of exposure was evaluated in the HHRA. Please remove the statement or explain why the route is considered incomplete.
p. 32 of 90, §11.4	The SAP proposes to compare site groundwater concentrations with upgradient concentrations to determine the need for further action. Please note that, if an HHRA is deemed necessary, COPC should not be screened against background concentrations before being carried through the risk calculations.
pp. 41-46 of 90	There are several analytes where the laboratory quantitation limit is above the project action limit. Please discuss the significance of this, or any possible data gaps because of this, in the SAP. Since project action limits are discussed on page 31 of 90, additional text in this section would be appropriate.