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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING ENGINEERING EVALUATION/COST ANALYSIS FOR MAIN GATE ENCROACHMENT AREA NAS SOUTH WEYMOUTH MA
07/20/2009
U S EPA REGION I

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

July 20, 2009

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

Re: Engineering Evaluation/Cost Analysis for the Main Gate Encroachment Area

Dear Mr. Helland:

EPA reviewed the draft *Engineering Evaluation/Cost Analysis* (EE/CA) for Naval Air Station South Weymouth, Weymouth, MA, dated June 2009 in light of its completeness, technical accuracy, and consistency. The document provides an assessment of potential removal action alternatives and their associated costs to address contamination detected at the Main Gate encroachment area. Detailed comments are provided in Attachment A.

The Regional Screening Levels (RSLs) were updated May 19, 2009 and the updated RSL Table is dated April 2009. The reference section for the EE/CA identifies an RSL table update for April 2009. However, a footnote for Table 2-1 refers to RSLs developed in 2008. Please confirm that all the RSL values used for this EE/CA are those in the latest update dated May 19, 2009. If an earlier table was used, please update all RSL values in all the tables to ensure the current values are used.

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

Sincerely,

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

Page	Comment
p. 5, §2.3	The second sentence refers to potential impacts from areas east of the Site. It appears that it should instead reference the areas west of the Site (from the road). Please correct.
§2.3.2	Please change "wee" in the fifth bullet paragraph to "were."
§2.3.4, ¶3	Please support the assertion that the area is not classified as a potential drinking water aquifer. EPA assumed that the entire base may be a potential aquifer.
§2.3.4, last ¶	Implementation of a removal action for site soil and sediment is expected to reduce the infiltration of PAHs into the groundwater and natural attenuation is expected to mitigate groundwater PAH concentrations over time. Please support these assertions by comparing the cleanup concentrations with MCL-based and Risk-based Soil Screening Levels (SSLs) from the EPA Regional Screening Levels document, if available. If the SSLs are less than the risk-based remedial goals, then adjust the remedial goals to prevent leaching.
p. 10, §2.3.4	This EE/CA addresses a removal action for soil, but the text speculates that contamination detected in groundwater will not require active remediation. While that could be possible, additional groundwater investigation and possibly a remedial action would be required before EPA could support a No Further Action decision for the groundwater at this Site.
p. 12, §3.1	In the second paragraph, the reference to 460 ft2 should be changed to 560 ft^2 (the sum of 400 ft^2 and 160 ft^2 as discussed on page 10). Please correct.
p. 13, §3.4, ¶1	Please edit the last sentence to delete the first phrase. As stated in the National Contingency Plan and in the second phrase of this sentence, ARARs must be considered to the extent practical considering the urgency of the situation and the scope of the removal. It is erroneous to state that ARARs are not directly applicable to removal actions.
p. 20, §4.4	In the second sentence from the top, please change the text: "… intent to conduct clearing, excavation, and restoration activities in these areas *or associated buffer zones* before work begins." A similar clarification should be made in Sections 4.4.2 and 4.5.2 and also to Table 3-2 in the wetlands discussion.
Table 2-1	a) For consistency related to the shading of C11-C22 aromatics, please either edit the note that refers to grey shading (it currently does not address exceedances of the MCP values) or provide an alternative indicator for exceedances of MCP values. b) Please edit the table to report individual sample results for all samples and their associated duplicates as well as the average values.

c) Please review the arsenic RSL presented (0.39 milligrams per kilogram) and explain why this is the correct screening value. This is the carcinogenic value which is greater than the non-carcinogenic value of 0.22 mg/Kg (10% of the HI=1 value).

Table 3-1

a) This table indicates that the Navy has chosen to use the MCP S-1/GW-1 values as cleanup goals for soil for any proposed removal action conducted. Given that several media were impacted by contamination and multiple COPCs were identified, it is not clear whether the MCP S-1/GW-1 values will be protective. Therefore, a risk evaluation may be necessary to demonstrate no excess risk subsequent to the removal action and before a No Further Action decision can be supported by EPA.

b) Cleanup goals for soil were not proposed for dibenzofuran and fluorene. For consistency, the MCP S-1/GW-1 value of 1,000 mg/Kg should be proposed for fluorene even though there were no exceedances of that concentration for fluorene in the samples collected. No MCP value exists for dibenzofuran. However, both of these contaminants have to be included in a subsequent risk assessment.

c) The sediment cleanup goal for dibenzofuran is listed as 0.42 mg/Kg. However, the background database for sediment lists the background value for dibenzofuran as 0.057 mg/Kg. Please correct.

Table 3-2

Regarding the discussion of the action proposed for the MCP (third line item), the text states that MCP Method 1 S-1 values will be used as cleanup goals for sediment. However, Table 3-1 states that background values, except as noted, will be used as sediment cleanup goals. Please remove the inconsistency and clarify the intent.

References

Consider adding Office of Management and Budget Circular A-94, Appendix C, dated December 2008 which appears to be what was used to determine the discount rate used for the present worth cost calculations.