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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT SITE
MANAGEMENT PLAN REVISION 9 NAS SOUTH WEYMOUTH MA
09/18/2009
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

September 18, 2009

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

Re: Draft Site Management Plan, Revision 9

Dear Mr. Helland:

EPA reviewed the Draft *Site Management Plan* for the Naval Air Station South Weymouth, South Weymouth, MA dated August 2009. The document describes the Installation Restoration Program Sites at the facility, provides a relative risk evaluation and ranking for each site, and presents the remediation schedules for addressing these sites under the Superfund program. Detailed comments are provided in Attachment A.

The FFA states that milestones established for activities that are fully funded in the current fiscal year are enforceable. However, the Site Management Plan does not specify which activities are funded for fiscal year 2010. Please include this information or clarify why it is not presented.

Please clarify whether the hazard ranking value is based on risk or general site information. For instance, in Appendix B, the "standard" for arsenic in soil is 22 mg/kg, although the EPA regional screening value for residential soil is 0.39 mg/kg for 1E-06 cancer risk. It would be helpful if Appendix A or B included the hazard ranking values and their basis (*i.e.*, site background or risk to an identified receptor) for chemicals so that the hazard ranking values could be compared with EPA risk-based screening levels. It would also be helpful if the site name could be identified along with the site number in the relative risk evaluation worksheets in Appendix B.

EPA noted the following errors in the relative risk evaluation worksheets: 1) PCBs are identified in sediment, but not soil at the Rubble Disposal Area; 2) Methyl naphthalene has a standard of 0.0 in soil at the Fire Fighting Training Area; 3) Soil is not evaluated at the Tile Leach Field; 4) the risk driver dieldrin is absent from soil and other media at the Sewage Treatment Plant; and 5) unusual compounds are identified for the Abandoned Bladder Tank Fuel Storage Area, including methylene dianiline in soil and zinc phosphide in surface water. As a result, EPA cannot approve the results of the risk ranking, the contents of the risk worksheets, or the site rankings in Table 4-1.

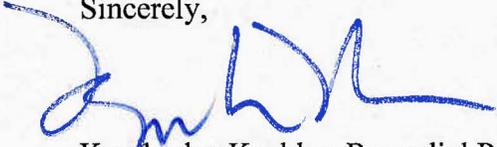
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I look forward working with you and the Massachusetts Department of Environmental Protection on the investigation and remediation of the remaining areas of the base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachments

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. 1-5, §1.1.3	The last sentence in the partial paragraph at the top of the page states that the draft RI Report will be issued in September 2008. Please update.
p. 2-15, §2.8.2	The last sentence mistakenly refers to the Phase II RI rather than the Phase I RI.
p. 2-15, §2.8.3	Please edit the first sentence. There is no context for the reference to the " <i>south-southwestern regional flow direction</i> ."
p. 3-2, §3.2	The second sentence in the second paragraph states that "...The FS recommends the alternatives that best meet the first seven...." Please change to: "...The FS evaluates the alternatives relative to the first seven...."
p. 4-2, §4.2	<p>The last sentence states that updates to the past risk rankings for Sites 9, 10, and 11 will be provided in a future update of the SMP:</p> <p>a) Please clarify why the risk rankings provided in Appendix A appear to be old rankings for Sites 1 through 8. For example, using information from the West Gate Landfill ROD (maximum concentrations and remedial goals), a soil contaminant hazard factor (CHF) of 148 was calculated and a groundwater CHF of 132 was calculated (<i>see</i> Attachment B). Both of these are significantly greater than the values presented in Appendix A. Based on these values, the CHF for both media would be classified as significant rather than moderate.</p> <p>b) According to the schedule information in Appendix C, Draft Remedial Investigation reports have been completed for Sites 9, 10, and 11. With that information, please provide initial site rankings for these three sites in this 2009 Site Management Plan.</p>
Figure 2-1	This figure presents the landfill boundary, but does not present the site boundary which is defined by the limits of contamination. Please add another line that defines the limit of contamination as it is currently known. As depicted, this figure is misleading as to the site boundary, it is not the landfill boundary presented. Please also review the figures for the other sites with this same consideration and make appropriate edits.

Table 4-1

Please review the rankings based on current data for each of these sites and include rankings for Sites 9, 10, and 11 in this 2009 Site Management Plan.

Appendix A

Please explain why current site data have not been used to update the site rankings.

ATTACHMENT B

Surface Soil	Max Conc. mg/kg	ROD RG standard	ratio	
Arsenic	3.20E+01	1.04	3.08E+01	
Benzo(a)anthracene	7.60E+00	4.73	1.61E+00	
Benzo(a)pyrene	3.40E+00	0.47	7.23E+00	
Dibenz(a,h)anthracene	7.90E-01	0.47	1.68E+00	
Dieldrin	2.30E-01	0.08	2.88E+00	
Lead*	4.40E+03	350	1.26E+01	
Total 2,3,7,8-TCDD TEQ (Dioxins)	1.30E-04	1.45E-05	8.97E+00	
Total PCBs	5.50E+01	0.67	8.21E+01	1.48E+02
Groundwater	ug/L			
1,4-Dioxane	1.50E+01	6	2.50E+00	
Arsenic	4.06E+00	10	4.06E-01	
Benzo(a)anthracene	1.00E+00	0.09	1.11E+01	
Benzo(b)fluoranthene	9.00E-01	0.09	1.00E+01	
Chromium	7.10E+01	47	1.51E+00	
Dibenz(a,h)anthracene	1.00E+00	0.009	1.11E+02	
Hexachlorobenzene	3.00E-01	1	3.00E-01	
Indeno(1,2,3-cd) pyrene	2.00E-01	0.09	2.22E+00	1.39E+02