

N00101.AR.002507
NAS SOUTH WEYMOUTH
5090.3a

LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT FEASIBILITY STUDY REPORT FOR BUILDING 82 NAS
SOUTH WEYMOUTH MA
10/16/2009
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION



COMMONWEALTH OF MASSACHUSETTS
 EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

DEVAL L. PATRICK
 Governor

IAN A. BOWLES
 Secretary

TIMOTHY P. MURRAY
 Lieutenant Governor

LAURIE BURT
 Commissioner

Mr. Brian Helland, RPM
 BRAC PMO, Northeast
 4911 South Broad Street
 Philadelphia, PA 19112-1303

Re: Draft Feasibility Study Report
 Building 82 Site
 Former South Weymouth NAS
 RTN No. 4-3002621
 October 16, 2009

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, reviewed the draft *Feasibility Study Report for Building 82, Naval Air Station South Weymouth, Weymouth, Massachusetts*, dated September 2009. 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. Malewicz, MassDEP-Boston

**MASSDEP COMMENTS ON
DRAFT FEASIBILITY STUDY REPORT
BUILDING 82 SITE
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
OCTOBER 16, 2009**

1. Section 1.3.1: As explained in comments on the remedial investigation report, the results from the remedial investigation indicate the presence of several additional contaminant release areas in the Building 82 study area (refer to Comment 1 attached to the September 25, 2009 letter). These releases should be identified and addressed in the feasibility study report.
2. Section 2.2.1: MassDEP does not agree with the conclusion that “there is no actionable risk for any of the contaminants in the soil”: (1) cancer risks attributable to soil exposure alone exceeded the state cancer-risk threshold [1×10^{-5} , 310 CMR 40.0993(6)] in several of the scenarios evaluated during the remedial investigation, (2) the magnitude and extent of soil contamination was not fully characterized during the remedial investigation (refer to Comment 4 attached to MassDEP’s December 5, 2007 letter and the Navy’s subsequent response), and (3) the risks attributable to contamination below a depth of 8 feet, where the soil samples with the highest contaminant concentrations were collected, were not determined during the remedial investigation (refer to Comment 6 attached to MassDEP’s December 5, 2007 letter and the Navy’s subsequent response). These results and circumstances indicate that further action is necessary to either: (1) demonstrate that soil remediation is not necessary (e.g., conduct a focused characterization of the magnitude and extent of soil contamination at each of the known release areas and fully assess the associated risks), or (2) include actions in the feasibility study that would eliminate unacceptable risks by remediating contaminated soil (e.g., refer to Comment 4 attached to MassDEP’s December 5, 2007 letter).
3. Section 2.2.2: The conclusion that “there was no actionable risk” associated with the finding that the chlorinated solvent 1,1,1-trichloroethane (1,1,1-TCA) is present in groundwater at a concentration exceeding the associated state and federal Maximum Contaminant Level (MCL) is inconsistent with the determination that state and federal drinking water standards are chemical-specific ARARs for the Building 82 remedy (Section 2.4.2). The application of these standards to a remedial action is not contingent on the degree of risk contributed by the chemicals for which the standards have been established. The exceedances alone are sufficient (refer to USEPA’s June 26, 2009 Memorandum “Summary of Key Existing CERCLA Policies for Groundwater Restoration”). Consequently, to satisfy these ARARs, the remedy should reduce concentrations of 1,1,1-TCA and all other site-attributable chemicals to below state and federal MCLs.
4. Section 2.4.1: Appendix A does not appear to include the HHRA calculations cited here.
5. Sections 4.2.2 and 4.2.3: Water level measurements obtained during the RI indicate that shallow groundwater in the vicinity of most of the injection points proposed under

Alternatives G-2 and G-3 (Figures 4-1 and 4-2) discharges to the two 42-inch storm sewers located immediately west of Hangar 2 (refer to Figure 1-8). Consequently, the report should describe the measures that would be taken to ensure that Alternatives G-2 and G-3 would not discharge oxidant and reducing additives to the storm sewers and adversely impact downstream surface water.

6. Tables 2-1, 4-1, 4-4, and 4-7: The state chemical-specific ARARs should include 310 CMR 40.0993(6), which specifies the state cumulative cancer risk limit (an excess lifetime cancer risk equal to 1×10^{-5}), and 314 CMR 4.00, Massachusetts Surface Water Quality Standards (potentially applicable to surface water in nearby ditches).
7. Tables 2-2, 4-2, 4-5, and 4-8: The state location-specific ARARs should include 310 CMR 10.00, Massachusetts Wetland Protection Act regulations (potentially applicable to nearby wetlands).
8. Tables 2-6, 4-3, and 4-6: The state action-specific ARARs should include 310 CMR 40.0040, which provides requirements for actions involving the injection of remedial additives.