

N00101.AR.002512
NAS SOUTH WEYMOUTH
5090.3a

LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT STREAMLINED HUMAN HEALTH RISK ASSESSMENT
FOR AREA OF CONCERN HANGAR 1 NAS SOUTH WEYMOUTH MA
10/23/2009
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

TIMOTHY P. MURRAY
Lieutenant Governor

IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

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

Re: Draft Streamlined HHRA
Area of Concern Hangar 1
Former South Weymouth NAS
RTN 4-3002621
October 23, 2009

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, reviewed the draft *Streamlined Human Health Risk Assessment* for Area of Concern Hangar 1, dated October 2009. Comments are attached.

If you have any questions about the comments, I can be reached at (617) 348-4005.

Sincerely,

A handwritten signature in cursive script that reads "D. Chaffin".

David Chaffin
Federal Facilities Project Manager
Bureau of Waste Site Cleanup

CC: D. Barney, USN-S. Weymouth
K. Keckler, USEPA
Chief Executive Officer, SSTTDC
RAB Members
A. Malewicz, MassDEP-Boston

**MASSDEP COMMENTS ON
DRAFT STREAMLINED HUMAN HEALTH RISK ASSESSMENT
AREA OF CONCERN HANGAR 1
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
OCTOBER 23, 2009**

1. Section 2.1: AOC Hangar 1 should be defined to consist of subsurface soil contaminated by releases from the floor drain systems that were addressed during the floor drain system removal actions. In particular, AOC Hangar 1 should be distinguished from the other known and potential release areas located within and adjacent to Hangar 1, including RIA 10C (North and South Lean-tos), RIA 11 (AFFF ASTs), RIA 99 (Radiation Survey), and the concerns identified during the June 30, 2005 inspection of the Hangar 1 interior (refer to July 6, 2005 e-message).
2. Section 6.0: As noted in the final paragraph of this section, estimated cancer risks exceeded the state risk limit, indicating that additional evaluation is necessary to demonstrate acceptable risk. A comparison of maximum contaminant concentrations to Method 1 standards is suggested.
3. Section 7.1: Analytical data of unknown quality are inadequate for site decision making. Consequently, while formal analytical data validation might not be possible, the analytical data used in the risk assessment should nevertheless be evaluated to the extent possible to develop and present an assessment of usability.
4. Sections 7.2 and 8.0: The comparison of site and "natural soil" concentrations should be deleted from the report because the results from samples H1-SS01 through H1-SS05, which were collected from soil not impacted by the floor drain systems, indicate that site-specific background concentrations are significantly lower than the "natural soil" concentrations.