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NAS SOUTH WEYMOUTH  
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LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT REMOVAL ACTION WORK PLAN FOR AREA OF  
CONCERN 55C NAS SOUTH WEYMOUTH MA

12/07/2009

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

Re: Draft Remedial Action Work Plan  
Area of Concern 55C  
Former South Weymouth NAS  
RTN 4-3002621  
December 7, 2009

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, has reviewed the draft *Removal Action Work Plan, Area of Concern 55C*, dated November 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, appearing to read "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, SSTDC  
RAB Members  
A. Malewicz, MassDEP-Boston

**MASSDEP COMMENTS ON  
DRAFT REMOVAL ACTION WORK PLAN  
AREA OF CONCERN 55C  
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)  
DECEMBER 7, 2009**

1. Section 3.4: The plan should explain how the two isolated areas where excavations will reach depths of 3 to 4.5 feet will be determined and located during the removal action.
2. Section 3.4: The plan should explain how debris that is too small to be separated from soil using an excavator bucket will be recovered and disposed.
3. Figure 3: The indicated AOC 55C boundary is out-of-date; deletion is recommended.
4. Appendix D: The floor sampling frequency specified in the sampling and analysis plan should agree with the frequency specified in Section 3.6.
5. Appendix D: At a minimum, the analytical data results from the confirmation samples should be validated in accordance with USEPA Tier II validation requirements, and the validation report should include a usability assessment.
6. Appendix E, Section 5.2: The invasive species addressed by the wetland monitoring program should include glossy buckthorn, which has adversely impacted wetlands elsewhere on the base.