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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT FINAL
DECISION DOCUMENT FOR REVIEW ITEM AREA 10C HANGAR 1 NORTH AND SOUTH
LEAN TOS NAS SOUTH WEYMOUTH MA
12/03/2009
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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

December 3, 2009

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

Re: Draft Final RIA 10C Hangar 1 North and South Lean-tos Decision Document

Dear Mr. Helland:

EPA reviewed the Draft Final Review Item Area 10C, Hangar 1 North and South Lean-tos, Decision Document, Phase II Environmental Baseline Survey, dated November 2009 and the responses to EPA's comments from 2004 and 2009. Detailed comments are provided in Attachment A.

EPA's comment on the 2004 Removal Action Report noted that the ultimate discharge location for the floor drains and sinks needed to be identified. As noted, "based on the types of operations that were conducted in the lean-tos; this represents a significant data gap that needs to be addressed before the site can be closed out." The Navy provided information indicating that some of the floor drains and sinks discharge ultimately to the Base storm drain system. For many of the drains/sinks and for all of those in the North Lean-To, the ultimate discharge location is presumed to be the Base storm drain system. EPA questions the appropriateness of this presumption. The drains could have discharged to drywells (or a septic system). Have drywells been discovered at SOWEY? Please explain what information was used to conclude that discharge was to the storm drain system. What has been done to physically investigate (i.e., excavate) the drains to track the discharge path?

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 contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Keckler".

Kymerlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Dave Barney, USN, South Weymouth, MA
Dave Chaffin, MADEP, Boston, MA
Kevin Donovan, SSTFDC, South Weymouth, MA
Phoebe Call, TTNUS, Wilmington, MA

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ATTACHMENT A

<u>Page</u>	<u>Comment</u>
§4.1.1	Please include iron the first unnumbered table because it also exceeded the human health benchmark.
§5.1	Please include iron in the unnumbered table and discuss how the detected concentration compares to background.
§5.2	Please revise the discussion in the paragraph starting with “Due to slow recharge...” The sentence “Concentrations of aluminum, chromium, heptachlor, lead, and vanadium in the other samples at RIA 10C do not exceed benchmarks” is correct but disregards the fact that the 2004 concentrations in MW05-306 still exceed the human health benchmark for iron, manganese, and antimony. Please add “Although MW05-306 had lower metals concentrations in 2004 than in 2003 probably owing to lower turbidity, the concentrations of iron, manganese and antimony in 2004 still exceed the human health benchmark.” This paragraph should also indicate that human health benchmarks were exceeded in monitoring wells in addition to MW05-306, <i>i.e.</i> manganese in MW05-305, -307, -308 and iron in MW05-305, and -307.
§5.2	Please revise the discussion in the paragraph starting with “The concentration of antimony...” Since iron, manganese and antimony exceeded benchmarks, it is incorrect to state that “...antimony was the only analyte detected in groundwater above benchmark (sic)...” To be consistent with the discussion about antimony, this paragraph should also discuss whether the maximum concentrations of iron and manganese exceed 10X the benchmark and background.
§6.0	Please revise this section to reflect the requested changes.
Table 4	Several of the test method numbers in the first column have a suffix of “(T)” [<i>e.g.</i> SW6010B (T)]. Please provide an explanatory footnote for this suffix. Also, please include a footnote that indicates that the turbidity in MW05-306 was lower in 2004 than in 2003.
References	Please provide a reference for the Foster Wheeler 2003 video survey (page 4).