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LETTER AND COMMENTS FROM U S EPA REGION I ON RESPONSE TO COMMENTS
REGARDING DRAFT DECISION DOCUMENT FOR REVIEW ITEM AREA 110 NAS SOUTH
WEYMOUTH MA
05/02/2009
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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

May 5, 2009

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

Re: Review Item Area 110 - Southeast Antenna Field Draft Phase II Environmental Baseline Survey Decision Document

Dear Mr. Helland:

EPA reviewed the responses to our comments dated March 19, 2009 on the Review Item Area 110 - Southeast Antenna Field Draft Phase II Environmental Baseline Survey Decision Document submitted in April 2009.

The response to General Comment 1 will be acceptable if the revised discussion of risk, as addressed in General Comment 3, presents a sufficiently comprehensive evaluation of the existing benchmark exceedances and clearly demonstrates that the exceedances do not equate to unacceptable risk.

General Comment 2 noted that the data in Table 5 could not be confirmed. These data have subsequently been confirmed with the additional data in the revised LRA Completion Report. EPA also noted that the Decision Document could not be accepted as final until the Limited Removal Action (LRA) Completion Report was finalized. After review of the March 2009 Final LRA Completion Report, two issues remained:

- 1) The Decision Document needed to evaluate the confirmatory sample data (done).
- 2) The level of habitat destruction needed to be clarified. Based on the April 6, 2009 site visit, EPA's main concerns included: A) removal of the remaining turtle barriers, B) removal of the logs in the wetland that were set-down to aid passage (not the apparently naturally-fallen tree), and C) removal of all solid waste. EPA agreed that there was a moderate level of habitat destruction and only minimal disturbance to the wetland. Regrading, revegetation, and future monitoring are not warranted. Assuming steps A-C taken, the LRA and the Decision Document can be finalized.

General Comment 3 expressed concern about several benchmark exceedances that were not addressed and recommended that the 2004 risk memos be updated to clearly demonstrate that all exceedances were evaluated. The response states that the evaluation will be enhanced to address the 2003 and 2004 exceedances at locations other than at Poles 3 and 4 but argues that updating the risk memos is not warranted. If the additional evaluation addresses all exceedances for soil/hydric soil left in place, and clearly demonstrates that the exceedances do not pose unacceptable risk, then

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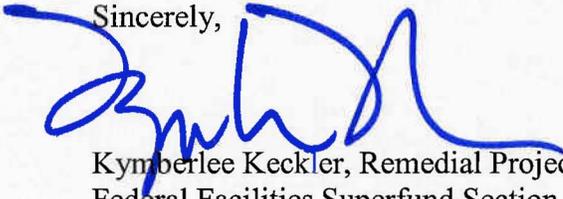
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EPA agrees that the updated risk memos are not necessary. EPA looks forward to reviewing the revised evaluation.

EPA accepts the response to General Comment 4 concerning iron and copper. However, new sites should be screened for COPC selection against the most recent EPA Regional Screening Levels, with decisions concerning inclusion of iron and copper in risk assessments to be made at the time of COPC screening.

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 or wish to arrange a meeting.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

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