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NAS SOUTH WEYMOUTH  
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EMAIL AND COMMENTS FROM U S EPA REGION I ON RESPONSE TO COMMENTS  
REGARDING DRAFT REMEDIAL ACTION WORK PLAN FOR SOIL EXCAVATION AT SITE 7  
NAS SOUTH WEYMOUTH MA  
07/10/2009  
U S EPA REGION I

**From:** Keckler.Kymberlee@epamail.epa.gov  
**Sent:** Friday, July 10, 2009 4:28 PM  
**To:** Brian.Corbett@tteci.com  
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**Subject:** Re: Submittal CTO-48-138 - Responses to USEPA and MADEP comments on Draft Remedial Action Work Plan for Soil Excavation at Site 7 - Former Sewage Treatment Plant Location  
**Attachments:** File 1 of 2\_CTO-48-138\_transmittal form.pdf; File 2 of 2\_2282-48-09-005\_IR 07 RTC.pdf



File 1 of CTO-48-138\_transm2282-48-09-005\_IR

File 2 of

EPA reviewed the Navy's responses, dated June 22, 2009, to EPA's June 5, 2009 comments on the draft Remedial Action Work Plan for the Soil Excavation at Site 7 for the Former Sewage Treatment Plant at the Former Naval Air Station South Weymouth, dated May 14, 2009 (RAWP). The document describes the means and methods that will be used to implement the remedial action cleanup at the subject site. EPA maintained the comment numbering used in the response document.

Regarding the Ivas Environmental Memorandum, dated May 30, 2009, that was included with the Navy's responses, please incorporate the changes identified in this memorandum into the next revision of the remedial action work plan. Note that some of the comments in the memorandum are not entirely clear, so please elaborate on them. For example, it appears that the ditch flow directions may have been misstated in the memorandum (i.e., should "northerly and then westerly again" be "southerly and then westerly again"?). Also, the discussion of the locations of the pesticide and PAH contamination appears to be incorrect in the memorandum. PAH is north of the sludge drying structure and pesticides are to the west or southwest.

General comment 2 was based on the bullet near the top of page 27 in the ROD. However, the description on page 30 clarifies the intent of the bullet on page 27. The Navy response is correct and accepted.

- 1. p. 6, Figure 3-1: a) The Navy response is not correct, location FSS-4 had a PAH exceedance in one sample that was averaged away using the results of a duplicate sample (see excerpts from the FS report below). Please add a data tag for location FSS-4 that identifies the concentration for the sample that exceeded the remedial goal (not the average). This will need to be considered in establishing the extent of excavation and/or confirmation sampling. Note that data tags are provided for all other FSS samples in this figure.

Excerpt from FS (page 4-7):

Pre-Design Investigation

Alternative 2 includes a proposed pre-design investigation intended to further delineate the types and extents of COCs requiring remediation. The proposed pre-design investigation would consist of one additional sampling round that includes the following scope:

Sampling to further delineate the extent of COCs exceeding PRGs

in surface soil is described below. Areas requiring additional investigation are shown in Figure 4-1.

Data indicate that surface soils in the area of locations FSS-1 and FSS-3 exceeded PRGs for PAHs. Additional investigation is needed in this area to better define the limits of the areas requiring remediation in surface soil. The investigation area around FSS-1 and FSS-3 will be expanded to encompass FSS-4 because, although this location was not identified as exceeding PRGs based on the average of a duplicate pair, one sample of the duplicate pair exceeded the PRG for benzo(a)anthracene. Surface soil samples collected from the area around FSS-1, FSS-3 and FSS-4 will be analyzed for PAHs, pesticides and arsenic.

b) The sample locations referenced in the response establish the northern, western, and eastern limits of PAH contamination around FSS-4. However, FSS-4 had a sample that exceeded the remedial goals. At a minimum, the area around FSS-4 needs to be resampled, if not excavated, because of the earlier exceedance. Please edit the work plan to include three samples (potentially confirmation samples) between the limits of the proposed A-2 excavation and location FSS-4 to establish the limits of PAH contamination there.

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Subject  
Submission CTO-48-138 - Responses  
to USEPA and MADEP comments on  
Draft Remedial Action Work Plan  
for Soil Excavation at Site 7 -  
Former Sewage Treatment Plant  
Location

This is being resent since Peter Golonka has now been added to the distribution list.

To All: I am sending you via this email, the files for Submittal CTO-48-138 - Responses to USEPA and MADEP comments on Draft Remedial Action Work Plan for Soil Excavation at Site 7 (dated May 14, 2009) - Former Naval Air Station - South Weymouth, MA.

This email contains the following two files:

(File 01 of 02) Transmittal Form

(File 02 of 02) Responses to USEPA and MADEP Comments on Draft Remedial Action Work Plan for Soil Excavation at Site 7 (dated May 14, 2009).

A hardcopy of this Submittal, CTO-48-138 Responses to USEPA and MADEP comments on Draft Remedial Action Work Plan for Soil Excavation at Site 7 (dated May 14, 2009), will be sent to the following personnel:

PMO North East: D. Barney (1 copy), B. Helland (1 coy)

MADEP: D. Chaffin (1 copy)  
USEPA K. Keckler (1 copy)  
Gannett Fleming P. Golonka (1 copy)

(See attached file: File 1 of 2\_CTO-48-138\_transmittal form.pdf) (See attached file: File 2 of 2\_2282-48-09-005\_IR 07 RTC.pdf)

If you have any questions or require additional information, please email George Sze at george.sze@tteci.com or call him at 215-702-4029.

Thank you.

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