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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT REMEDIAL
ACTION WORK PLAN FOR SOIL EXCAVATION AT SITE 7 NAS SOUTH WEYMOUTH MA
06/05/2009
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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

June 5, 2009

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

Re: Draft Remedial Action Work Plan for the Soil Excavation at Site 7 - Former Sewage Treatment Plant

Dear Mr. Helland:

Thank you for the opportunity to review the *Draft Remedial Action Work Plan For Soil Excavation at Site 7 for the Former Sewage Treatment Plant at the Former Naval Air Station South Weymouth, South Weymouth, Massachusetts*, dated May 14, 2009 (RAWP). Detailed comments are provided in Attachment A.

Please include the area and approximate dimensions of each of the excavation areas.

The Record of Decision (ROD) requires pre- and post-remediation groundwater monitoring to verify that groundwater is not a medium of concern for the site. The PDI only included groundwater level monitoring and this work plan does not include pre-remediation groundwater chemical sampling. Please address the ROD requirements by including a pre-excavation groundwater chemical monitoring round in the work plan.

Please verify that it is practical, based on the height of the roof, to use the sludge drying area as a soil stockpile area as shown in Figure 4-1.

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.

Sincerely,

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

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

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

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ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 6, Figure 3-1	a) Please add a data tag for location FSS-4. It had a PAH exceedance in one sample. b) At a minimum, the area around FSS-4 needs to be resampled, if not excavated, because of the earlier exceedance. Please include three samples between the limits of the A-2 excavation and location FSS-4.
p. 7, Table 3-1	For clarity, please edit the selection basis for carcinogens to indicate "cumulative human health cancer risk = 10^{-5} ."
p. 8, §4.0	Please add waste characterization sampling for disposal.
p. 9, Figure 4-1	This figure identifies the former sludge drying area as the location where decontamination will occur. However, the typical site zones configuration detail shows contamination reduction zones associated with each excavation. Based on the description in Section 4.2.4 it appears that decontamination of equipment will occur at each excavation area and that a final redundant decontamination of equipment will occur at the end of the project in the former sludge drying bed area. Please clarify the intent regarding the decontamination operations.
p. 10, §4.1.3	If erosion controls will be installed after surface clearing, it must be done immediately after clearing, otherwise it must be done before clearing. Please show all activities on a project schedule.
p. 10, §4.2.1	The text states that Areas A-1 and A-2 have been adequately delineated during previous investigations.
p. 10, §4.2.3	Regarding the first bullet, it is EPA's understanding that all sample locations were documented with GPS. Please add the GPS coordinates for all sample locations with COC exceedances. Also, add the northing and easting coordinates for the corners and direction changes of each of the areas designated for excavation.
p. 10, §4.2.4	Please clarify that excavation equipment will be decontaminated before each new excavation and that rinsate samples will be collected to document the effectiveness of the decontamination.
p. 11, §4.4	Please edit this section to indicate that confirmation samples will be collected from locations other than those that were field screened to provide better coverage of the areas to be sampled.
p. 12, §4.6	Please edit the end of the last sentence by adding: "... and collected for off-site disposal."

- p. 12, §4.7.2 The first and second sentences appear to contradict. The second sentence suggests something other than common fill will be used for the top six inches of backfill but that is not shown in Figure 4-2. Please edit the text and figure as necessary to clarify the intent.
- p. 12, §4.7 Regarding the last sentence, please edit the site description to include the character of the planned access routes. If the routes are not paved or hardpan they will likely require restoration too.
- p. 12, §4.8 Please either show proposed monitoring well relocation areas or indicate that regulators will be consulted before new monitoring wells are installed.
- p. 16, §5.1.2
- a) Please edit the second sentence to indicate that, in addition to the sample frequency stated, a minimum of one sample shall be collected from each wall of the excavation. Also, reduce the sample frequency for bottom samples to every 1,000 square feet with a minimum of one sample per excavation. For example, with this revised frequency excavation A-1 would require four bottom samples and nine side wall samples. This is a reasonable confirmatory sampling requirement for an excavation of this size to document suitability for unrestricted site use.
 - b) Note that confirmation samples shall be collected from locations offset from the field screening sample locations. For example, halfway between field screening sample locations.
- p. 18, §5.3 Please add rinsate samples (*e.g.*, for excavation equipment) to the sample type list.