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NAS SOUTH WEYMOUTH
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LETTER REGARDING U S EPA REGION I REVIEW OF SUPPLEMENTAL DATA GAP
SAMPLING PLAN FOR REVIEW ITEM AREA 111 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: RIA 111 Supplemental Data Gap Sampling Plan

Dear Mr. Helland:

EPA reviewed the document entitled *RIA 111 Supplemental Data Gap Sampling Plan, Naval Air Station South Weymouth, Weymouth, Massachusetts*, submitted on May 13, 2009. The Data Gap Sampling Plan proposes a GPR survey over the entire former hangar footprint, location and excavation of additional test pits, and collection of soil samples for laboratory analysis.

In its review of the December 2008 Draft Field Report for Review Item Area 111 Data Gap Investigation, EPA noted that sampling had been conducted in accordance with the Data Gap Sampling Plan and that the soil boring and test pit soil sample data provided sufficient site characterization, pending resolution of a few issues. The main issues included:

- Possible contamination (*e.g.*, arsenic and PAHs) in test pit TP01 could have migrated through cracks in the floor of the vault over time and warrant soil sampling beneath the vault, unless rationale for why this migration pathway was unlikely was provided
- Investigation and tracing of two pipelines connecting to the vault, to determine their origin and termination points to ensure that we are not overlooking a source of contamination or release area
- The revised Decision Document should include a screen of surface soil sample data against applicable ecological benchmarks (EcoSSLs, where available) for the two surface soil samples at SB06 and SB09.

To determine if contamination in the vault migrated to the surrounding soil, samples closer to the vault are needed. Soil borings, as discussed in the February 5, 2009 meeting, adjacent to the vault should be included.

The proposed ground penetrating radar (GPR) survey to “trace the pipelines terminating in the vault to their point of origin, trace the existing pipelines connecting the catch basins to assist in placement of the new test pits, and search for and locate any additional vaults or subsurface voids beneath the concrete slab” addresses EPA’s second bullet. However, the sensitivity of the GPR should be tested early to ensure that piping can be detected by the equipment used. If piping is not detected, an EM survey or camera inspection of the lines will be needed.

The third bullet is not addressed. While the DQLs are based on human health and ecological criteria, there is no indication that the previously collected surface soil data were screened using

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ecological criteria. This screening should be conducted to ensure that more surface soil data are not needed.

The report proposes that mercury and cyanide not be included in the chemical analyses because neither was detected in the July 2008 samples. EPA notes that mercury was detected in two samples (SB-02 and SB-07), though at concentrations well below background. In spite of these two detections, omission of mercury is probably acceptable in this follow-up investigation, as it was not identified as problematic in previous sampling. If the test pitting or GPR survey find additional possible point sources of contamination, however, mercury and cyanide should be included in the analyses used to characterize these new locations.

The second sentence of Section 4.2 appears to be incomplete. Should "...based on criteria relative human health- and ecological-risk benchmarks used in the Phase II EBS" be changed to "...based on criteria relative to human health- and ecological-risk benchmarks used in the Phase II EBS?"

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,



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