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EMAIL AND THE MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS DRAFT REMEDIAL INVESTIGATION WORK PLAN /TIER II SAMPLING AND
ANALYSIS PLAN FOR AOC HANGAR 1 NAS SOUTH WEYMOUTH MA
12/05/2014
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Subject: AOC Hangar 1 RI Work Plan
Date: Friday, December 05, 2014 4:05:48 PM

For Use In Intra-Agency Policy Deliberations

Comments on the draft Remedial *Investigation Work Plan/Tier II Sampling and Analysis Plan* for AOC Hangar 1, received November 28, 2014:

1. Section 10.4.2 should also identify the AFFF distribution system as a potential source of AFFF (refer to Section 10.2), and the work plan should summarize prior work that confirmed it is not a source (e.g., soil sampling results and clean-out documentation) or include provisions to assess it as a potential source.
2. Section 10.4.2: The sentence indicating that the highest PFOS/PFOA concentrations in soil were reported in samples collected in the vicinity of the former ASTs is inconsistent with statements in the first paragraph of Section 10.4.3. Please confirm or correct as appropriate.
3. Section 10.4.4: Please add detail to describe the transport pathway(s) by which PFCs could accumulate in concrete foundations creating a continuing source of PFCs contamination (e.g., sorption from groundwater and/or penetration of concrete floors).
4. Section 10.4.5: The work plan should explain why exposure to PFCs in soil will not be evaluated in the risk assessment, or soil exposure should be evaluated in the risk assessment.
5. Section 11.3: To confirm that the soil samples used to assess leaching are collected from potential source zones, the soil samples and leachate extracted from each of the soil samples should be analyzed for PFOS and PFOA.
6. Worksheet #15: The work plan should explain why the more stringent USEPA Provisional Health Advisory (PHA) values for PFOS and PFOA were not selected as PALs for residential exposure. In addition, for review purposes, the work plan should include the calculations used to determine the proposed PALs (e.g., an appendix with input- and output-screen images).
7. Figure 17-1: As suggested by the proposed locations of well pairs MW-103/MW-103D, MW05-033/MW-110D, MW-107/MW-107D, and MW-108/MW-108D, MassDEP recommends relocating MW-106/MW-106D east-northeastward to the immediate vicinity of the groundwater restriction boundary for potential long-term monitoring purposes.
8. Figure 17-1: To assess and potentially reduce the downgradient extent of PFCs delineated in bedrock, MassDEP recommends that a bedrock well be installed adjacent to existing overburden well MW05-302, which appears to be located near the core of the PFCs plume.

9. Figure 17-1: Available data indicate that PFCs contamination is not likely to extend as far north as the proposed location of well pair MW-102/MW-102D. To assess this possibility and potentially reduce the northern extent of PFCs contamination, MassDEP recommends that well pair MW-102/MW-102D be relocated southeastward to the southwest corner of the Cummings Road-Shea Drive intersection.

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