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Mr. Mark Leipert
Department of the Navy
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop No. 82
Lester, Pennsylvania 19113-2090

Re: Revised Streamlined HHRA – AOC 83
Former South Weymouth NAS
RTN No. 3-2621
November 2, 2004

Dear Mr. Leipert:

With the exception of the conclusion that AOC 83 is suitable for unrestricted use, the Department accepts the revised *Streamlined Human Health Risk Assessment, Area of Concern 83* (former hazardous waste accumulation area), dated October 29, 2004, without further comment.

The Department takes exception with the conclusion that AOC 83 is suitable for unrestricted use because we believe the sampling effort conducted at AOC 83 and the streamlined risk assessment approach used to assess the sample results were not sufficient in scope to demonstrate that AOC 83 is suitable for unrestricted use:

- Aerial photographs indicate that AOC 83 was used for industrial activities during a period spanning decades, and the results from existing soil samples indicate that PCBs were released as consequence of these activities. However, records concerning the nature of these activities are sparse, and the source and extent of the PCB contamination are not known. While existing sample results do not indicate the presence of a release that poses unacceptable risk, the distribution of sample locations is not sufficient to rule-out the presence of a release that could pose a significant risk to the most sensitive potential receptors under an unrestricted use scenario. For example, within AOC 83, no samples were collected from a contiguous area of approximately ¼ acre, an area representative of a typical residential lot.
- The streamlined risk assessment approach was intended to be used to support non-time critical removal actions at AOCs; it was not intended to be used to justify no action decisions where remedial action is not conducted. Instead, such no action decisions should be supported by a remedial investigation (refer to draft *Consensus Statement, Streamlined Risk Assessment Process for CERCLA Removal Actions*, dated November 21, 2000).

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In contrast, we believe the streamlined risk assessment and supporting sample results are sufficient to demonstrate acceptable risk for industrial, commercial, and recreational use of AOC 83. Essentially, a higher degree of uncertainty can be accepted for the characterization of the risks posed by these uses than can be accepted in a demonstration of acceptable risk for the unrestricted use. Consequently, we believe the Navy should consider two alternative paths forward for AOC 83: (1) implement activity and use limitations to allow activities consistent with industrial, commercial, and recreational uses and prevent more sensitive uses that might pose unacceptable risks, or (2) conduct a remedial investigation sufficient in scope to determine whether or not conditions at AOC 83 pose acceptable risk for unrestricted use.

The Department looks forward to working with the Navy to address the concerns outlined in this letter. If you have any questions regarding this letter, please contact David Chaffin, Project Manager, at (617) 348-4005.

Very truly yours,



Anne Malewicz
Federal Facilities Section Chief
Bureau of Waste Site Cleanup

CC: D. Barney, USN-S. Weymouth
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