



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

February 8, 2001

Robert M. Gill
Remediation Program Manager
HQ AFCEE/MMR
322 East Inner Road
Otis ANG Base, MA 02542-5028

Re: MMR Multiple Source Area Cleanup Program
Proposed Revised Remedial Action Levels

Dear Mr. Gill:

EPA has completed its review of your letter dated January 25, 2001. That letter formally documents the proposal AFCEE made to EPA and MADEP at the RPM Meeting on January 24, 2001 regarding the revision of the remedial action levels selected for the following sites in the multiple source area cleanup program:

CS-10/FS-24 Source Areas	Record of Decision	July 1999
FS-9	Record of Decision	June 1999
Priority 2 and 3 Study Areas and Drum Disposal Operable Unit Source Removal	Action Memorandum	June 1999
CS-16/CS-17	Record of Decision	May 1999
FTA-2/LF-2, PFSA/FS-10/FS-11, SD-2/FS-6/FS-8, SD-3/FTA-3/CY-4, SD-4, and SD-5/FS-5 Source Areas	Record of Decision	September 1998

Based on our review of the table entitled "Soil Target Cleanup Levels for Sites Requiring Remedial Action Driven By Inorganic and/or PCB Risk" (which was attached to your letter) and on past working sessions we have had with your office and MADEP, EPA accepts the proposed revised remedial action levels. Although all but one are higher than the original remedial action levels, these revised levels are protective of human health and the environment, as required by CERCLA. Furthermore, EPA believes that the revised levels were developed in a technically sound manner based on proper and substantial documentation (e.g., *Technical Memorandum, Revised Ecological Soil Target Cleanup Levels for Inorganics*), including, for PCBs, EPA guidance.

In your letter, you propose to prepare one comprehensive Explanation of Significant Differences (ESD) to update the affected decision documents. In situations where the original cleanup levels in a ROD are changed, an ESD is the proper decision document (see EPA's *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Documents* (EPA 540-R-98-031) (OSWER Directive 9200.1-23P) (July 1999)). To change the cleanup levels selected in an action memorandum supporting a removal action, however, an addendum to the action memorandum is the appropriate document. Therefore, EPA requests that AFCEE prepare an ESD for the four affected RODs and an action memorandum addendum for the affected action memorandum to document the specific changes itemized in the table entitled "Soil Target Cleanup Levels for Sites Requiring Remedial Action Driven By Inorganic and/or PCB Risk."

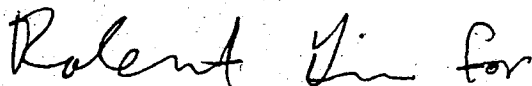
In addition to documenting these revised cleanup levels, the ESD and, if needed, the action memorandum addendum should incorporate any other minor remedy changes that have arisen during the remedial design process for these sites. These changes include, but are not limited to, the following:

- the UST removal at CS-10, Detail C
- the No Further Action decision for CS-10, Details A and G (based on post-ROD sampling)
- the decision not to include thermal enhancement for the SVE system at CS-10
- the addition of a thermal oxidizer for the initial phase of the project on the off-gas treatment system (not specified in the ROD) at CS-10
- the No Further Action decision at FS-9, Detail A (based on post-ROD sampling)
- the removal of soil at SD-3/FTA-2/CY-4 (based on ROD-required sampling)

As we discussed at the RPM meeting, EPA requests that AFCEE develop a schedule for document preparation and finalization that will assure issuance of both the ESD and the action memorandum addendum for public comment prior to the start of soil excavations for these sites. EPA recommends that a conference call or meeting be convened to discuss the ESD and action memorandum addendum schedule and requirements to ensure that the draft documents contain legally adequate language regarding the revised cleanup levels and any other remedy differences.

Please call Robert Lim at (617) 918-1392 or myself at (617) 918-1388 should you have any questions.

Sincerely,



Paul Marchessault, Remedial Project Manager
Federal Facilities Superfund Section

cc: Mike Jasinski, EPA
Robert Lim, EPA

Elizabeth Mason. EPA
Jon Davis. AFCEE
John Schoolfield. UNITEC
Prakash Ramaswany. UNITEC
Ann Sieben. ECC
Len Pinaud. MADEP
Cathy Kiley. MADEP



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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May 2, 2001

Robert M. Gill
Remediation Program Manager
HQ AFCEE/MMR
322 East Inner Road
Otis ANG Base, MA 02542-5028

Re: MMR Multiple Source Area Cleanup Program
Proposed Change in Remedial Action Level for Lead in Soils

Dear Mr. Gill:

EPA has completed its review of your letter dated April 17, 2001. In it, AFCEE proposes to change the ecological-risk based remedial action level for lead in soils from 50 parts per million (ppm) to 99 ppm for the following sites in the multiple source area cleanup program:

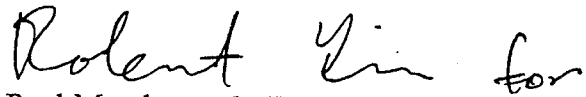
CS-10/FS-24 Source Areas	Record of Decision	July 1999
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Based on our review of the data-set upon which the 50 ppm remedial action level was selected, EPA accepts the proposed remedial action level of 99 ppm for lead in surface soils. Although it is almost twice the previous level, the remedial action level of 99 ppm is protective of human health and the environment, as required by CERCLA.

As we required in a previous letter, AFCEE must document this change in remedial action level in an Explanation of Significant Differences (ESD) and an Action Memorandum Addendum to update the affected decision documents.

Please call Robert Lim at (617) 918-1392 or myself at (617) 918-1388 should you have any questions.

Sincerely,

Handwritten signature of Robert Lim in cursive script.

Paul Marchessault, Remedial Project Manager
Federal Facilities Superfund Section

cc. Mike Jasinski, EPA
Robert Lim, EPA
Elizabeth Mason, EPA
Jon Davis, AFCEE
John Schoolfield, UNITEC
Prakash Ramaswamy, UNITEC
Ann Sieben, ECC
Len Pinaud, MADEP
Elliot Jacobs, MADEP