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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING REVISED FEASIBILITY STUDY REPORT FOR BUILDING 82
NAS SOUTH WEYMOUTH MA
10/15/2010
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION



COMMONWEALTH OF MASSACHUSETTS
 EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
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DEVAL L. PATRICK
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 Secretary

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 Lieutenant Governor

LAURIE BURT
 Commissioner

Mr. Brian Helland, RPM
 BRAC PMO, Northeast
 4911 South Broad Street
 Philadelphia, PA 19112

Re: Feasibility Study Report
 Building 82 Site
 Former South Weymouth NAS
 RTN No. 4-3002621
 October 15, 2010

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, reviewed the revised *Feasibility Study Report for Building 82, Naval Air Station South Weymouth, Weymouth, Massachusetts*, dated September 2010. Comments are attached.

If you have any questions about the comments, I can be reached at 617-348-4005.

Sincerely,

David Chaffin
 Federal Facilities Project Manager
 Bureau of Waste Site Cleanup

CC: D. Barney, USN-S. Weymouth
 K. Keckler, USEPA
 Executive Director, SSTDC
 RAB Members

**MASSDEP COMMENTS ON
DRAFT FEASIBILITY STUDY REPORT
BUILDING 82 SITE**

FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)

October 15, 2010

1. Section 4.2.2, Alternative G-2: Chemical Oxidation, LUCs, and Natural Attenuation with Monitoring:

- Because the injection well network proposed for the TCE plume appears to target the plume for treatment (Figure 4-1), but might not treat the contaminant source region, the assumption that the proposed injection program will destroy enough of the source region to prevent post-treatment rebound is not certain. Consequently, to ensure that the source strength is adequately reduced before relying on natural attenuation to complete the cleanup, this alternative should include contingencies such as supplemental source region injectors and repeat treatments.
- Because ISCO treatment would be expected to destroy a significant fraction of the existing bacterial community, the report should explain how the lost bacterial community would be restored and the report should include a restoration time estimate.
- LUCs: The base reuse plan indicates that the areas overlying the contaminant plumes will be densely redeveloped for a variety of uses. Consequently, to prevent redevelopment activities that could compromise or interfere with the remedy, the LUCs should include measures that would prevent such activities from occurring until the remedial action is completed. In particular, the LUCs should include measures that would ensure: (1) access to and protection of injection wells and monitoring wells, (2) access to the 42-inch storm sewer lines and the receiving open ditch to the south, and (3) sufficient access to the plumes to allow implementation of alternative remedies in the event that remedy modification or replacement becomes necessary.
- Long-Term Monitoring: To monitor potential adverse impacts to downgradient surface water, the long-term monitoring program should include collection and analysis of water samples from the 42-inch storm sewer lines and collection and analysis of surface water samples from the receiving ditch to the south.

2. Section 4.2.3, Alternative G-3: In-Situ Enhanced Bioremediation, LUCs, and Natural Attenuation with Monitoring:

- The report should explain how subsurface conditions would be controlled and monitored sufficiently to ensure effective contaminant destruction without generating an extensive iron and manganese plume that exceeds the extent of the existing plumes or adversely impacts surface water in the open ditch located south of Building 82.
- This alternative should address the concerns raised about LUCs and long-term monitoring in Comment 1.

3. Section 4.2.4, Alternative G-4: Natural Attenuation with Monitoring and LUCs:

- The assumption that groundwater monitoring would be conducted using seven existing monitoring wells and six new monitoring wells is reasonable for the purposes of the report; however, in the event that this alternative is selected for design and implementation, significant modifications, including installation of additional new wells, may be required during the remedial design and construction effort to establish a reliable long-term monitoring network.
- Conflicting statements about the estimated time to achieve PRGs (p. 4-21: 30 years, p. 4-23: 40 to 60 years, and p. 5-3: 40 to 60 years) should be corrected.
- This alternative should address the concerns raised about LUCs and long-term monitoring in Comment 1.

4. Tables 2-4 and 2-5: The Massachusetts Drinking Water Guideline for 1,1-dichloroethane (70 ug/L) should be identified as an ARAR/TBC and selected as a PRG.