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NAS SOUTH WEYMOUTH
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT PRE DESIGN
INVESTIGATION REPORT FOR SITE 1 WEST GATE LANDFILL NAS SOUTH WEYMOUTH
MA
12/29/2009
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

December 29, 2009

Brian J. Helland, P.E.
BRAC Program Management Office NE
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Draft Pre-Design Investigation Report for the West Gate Landfill

Dear Mr. Helland:

Thank you for the opportunity to review the responses to EPA's comments, dated November 30, 2009, on the *Draft Pre-Design Investigation Report* for the West Gate Landfill, Naval Air Station South Weymouth, dated September 2009 (PDI Report). The PDI Report was prepared to document the findings of the Pre-Design Investigation of the West Gate Landfill conducted to collect data needed to complete the Remedial Design. Detailed comments are provided in Attachment A.

The response to letter comment 3 indicates that the Navy plans to perform post-excavation sediment sampling and analysis as part of the remedial action. Please clarify whether this sampling and analysis plan will be presented as a component of the remedial design document or if a separate sampling and analysis plan will be submitted for review.

The response to letter comment 6 does not recognize the problem presented by the comment and therefore further discussion is warranted. The 220 cfs flow rate reported in the Rockland flood insurance study (FIS) is the flow at the confluence of the east and west branches of French Stream. The east branch is the stream discussed in the Rockland FIS that originates approximately 3,500 feet north of its Spruce Street crossing. The west branch of French Stream is adjacent to the West Gate Landfill. Therefore using the 220 cfs flow rate for the west branch of French Stream upstream of STA 2+00 is not correct. Therefore, the stream configuration used in the calculations likely underestimates the flooding potential.

I look forward working with you and the Massachusetts Department of Environmental Protection to complete the cap construction at the West Gate Landfill. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kimberlee Keckler".

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

**cc: Dave Barney, USN, South Weymouth, MA
Dave Chaffin, MADEP, Boston, MA
Kevin Donovan, SSTDC, South Weymouth, MA
Phoebe Call, TTNUS, Wilmington, MA**

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
5., p. 3-8, §3.2.2.1	b) Further discussion of the scope of the sampling and analysis plan proposed is warranted.
10., Table 3-7	b) Review of the 30% design document indicates that the PCB transformer locations 4 and 5 are not clearly within the proposed landfill cap but are within the interpreted landfill extent. Therefore, EPA presumes that the debris and contaminated soil at these locations will be consolidated under the landfill cap.
13., Figure 2-1	b) EPA requested that the navy add the EM survey lines to this figure, but the state plane coordinates were added instead. Please revise Figure 2-1 to include the EM survey lines together with the conductivity shading.
14., Figure 3-8	a & b) Although the responses are accepted, please correct the line in the legend related to the peat – the legend uses a black line and the figure uses a green line to depict peat thickness.
15., Figure 3-9	The response is not acceptable. As presented, the figure presents an incomplete and misleading representation of the PAH contamination. Please either revise the figure to include all contaminants of concern for all sample locations or edit the figure note and figure title to clearly indicate that not all contaminants that exceed their project action limits have been presented.
19., Appendix E	<p>c) Please refer to the comment on the response for letter comment 6. The way the flood impacts have been modeled for the west branch of French Stream is not appropriate and potentially underestimates the flooding impact. A better description of the assumptions and model input data used is required to confirm that the appropriate inputs to the model have been used. In addition to the flow rates used, EPA is concerned about the methods and results related to the stream configuration used in the model. Please edit this appendix to make the work more transparent. A conference call may be warranted to discuss this further.</p> <p>d) The response presents an incorrect conversion of the NGVD datum to the NAVD datum. For the site location NAVD elevations are less than NGVD elevations. Therefore at STA 2+00 the NAVD elevation must be less than 125.00. Please correct all the datum conversions to ensure that the correct elevations are used throughout this appendix.</p> <p>f) The introductory section added to the narrative does not adequately address the information requested by EPA. Please refer to the comment on the response to comment 19c, above.</p> <p>g) Please clarify the rationale for selecting a point only eighteen feet from French Stream given the configuration of the drainage area at STA 100.00.</p> <p>h) Please refer to the comment on the response to letter comment 6.</p>

i) As the response states TR-55 requires the longest time of concentration to calculate the peak flow rate, but the travel time on paved areas and through storm drains is not necessarily the shortest time as the response states. The flow path determines the travel time and given the large areas and long drains at SOWEY, the Navy should not assume that these pathways are not controlling. Better documentation of the work supporting the time of concentration is warranted.