N00101.AR.002479
NAS SOUTH WEYMOUTH
5090.3a

LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT POST REMEDIATION WETLAND MONTORING REPORT FOR SPRING 2009 AT OPERABLE UNITS 2 (OU 2) AND 9 (OU 9) NAS SOUTH WEYMOUTH MA
08/10/2009
U S EPA REGION I

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

August 10, 2009

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

Re: Draft Post-Remediation Wetland Monitoring Report – Spring 2009 for the Rubble Disposal Area

Dear Mr. Helland:

Thank you for the opportunity to review the *Draft Post-Remediation Wetland Monitoring Report – Spring 2009 for Rubble Disposal Area* dated July 2009. The Wetland Monitoring Report evaluates vegetation, soil, and hydrology data for the June 8 to 9, 2009 monitoring event conducted as part of long term monitoring (LTM). The performance criteria and monitoring methodology generally reflect those proposed in the LTMP and are consistent with previous monitoring events. Detailed comments are provided in Attachment A.

EPA supports the proposed action to quantify shrub development (last sentence in Section 4.1). It is necessary because the current site data do not support the assertion in Table 4 that the Performance Standard for trees and shrub seedlings (500 at the end of Year 5) is likely met. As noted in the report, none of the plots in the restored wetlands had any tree or shrub seedlings and only one single red maple stem was found in the created wetland plots. It is therefore unlikely that the standard will be met in Year 5. Further, while the observations of trees and shrubs in areas of the wetland not included in the survey plots and transects is positive, the observation alone does not indicate that the wetland is on a "positive trajectory" to attaining the performance standard. Statements in the report that this standard is met or likely met (*e.g.,* Table 4) should be modified.

Depending on the results of the fall 2009 measurements, tree and shrub plantings should be considered. Glossy buckthorn colonization is still minimal and it would be good to establish other trees and shrubs in the wetland while this is still the case. Similarly, the tree and shrub species mentioned in Section 4.1 (page 9) are not all listed in Appendix A. Please clarify if the Appendix A list is for all observations or only those from the plots and transects. If it is for all observations, please add the tree and shrub species listed in the text. If it is for the plots and transects only, please revise Table 1 to reveal that some shrubs (alders) were found in the restored wetlands.

Rainfall data were provided in the Year 3 (2008) Monitoring Report in response to a recommendation made on a previous report. Please explain why the presentation of regional rainfall data has been discontinued.

The report argues against the application of herbicide on purple loosestrife for three reasons: 1) spraying may damage other plants, 2) purple loosestrife removal would likely be followed by recolonization from the nearby wetland, and 3) the *Galerucella* beetles should control purple

loosestrife. Is spraying the only feasible herbicide application method? Herbicide application at the base of individual plants or clumps of plants, with a sponge applicator could be conducted. This could minimize damage to surrounding plants and could be conducted concomitantly with the *Phragmites* applications. If the wetland is already densely vegetated with native wetland species, the likelihood that loosestrife will recolonize this would be minimized. While EPA recognizes that the large adjacent wetland may serve as a source of invasive plant propagules to the RDA wetland, the Navy should control invasives in the RDA wetland to foster establishment of a dense, thriving native wetland plant community and minimize colonization by invasive species. Please provide scientific support that the presence of *Galerucella* beetles will result in future control of loosestrife density in the wetland.

The report notes that the beetles found on purple loosestrife may be in the genus *Galerucella*, the genus of the species used for loosestrife control, but the photograph caption appears less certain. Has this identification been confirmed?

EPA notes that responses have not been provided for comments on the previous wetland monitoring reports for this site. Please provide.

I look forward working with you and the Massachusetts Department of Environmental Protection on the investigation and remediation of the remaining areas of the base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

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

ATTACHMENT A

Page	Comment
Table 1	A comparison between the data here and the data in previous monitoring reports, it is apparent that, in some plots (*e.g.*, R7 and R9), the aerial coverage of native species has increased relative to the exotic invasive species. Please comment on how this change came about. Were invasive species removed in these areas?
Table 4	The third performance standard for vegetation, listed on page 2, "Areas with less than 50 percent vegetative cover after the second growing season (*i.e.*, 2006) will be reseeded" is not included in the table. Please add it for completeness, even though no reseeding appears necessary based on the 2009 data.
Figure 2	The northern patch of common reed is in a location that does not match that shown in the Year 3 (2008) monitoring report, which showed it just south of the northernmost created wetland. Please identify which location is correct.
Appendix C	Between the field data summary sheets for Plots R7 and R8, there is an incomplete plant list. Please either complete the list and move it to an appropriate Appendix or remove it if it is extraneous.