

N00101.AR.002491
NAS SOUTH WEYMOUTH
5090.3a

LETTER AND COMMENTS FROM U S EPA REGION I REGARDING WETLAND AND WATER
RESOURCES DELINEATION AND FUNCTIONAL ASSESSMENT FOR WEST GATE
LANDFILL NAS SOUTH WEYMOUTH MA
08/26/2009
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

August 26, 2009

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

Re: Wetland and Water Resources Delineation and Functional Assessment for the West Gate Landfill

Dear Mr. Helland:

EPA reviewed the *Wetland and Water Resources Delineation and Functional Assessment for West Gate Landfill*, dated July 2009. The report presents the results of an updated wetland delineation and assessment of functions and values for two WGL wetlands, WGL-W1, a small depression within the landfill footprint and WGL-W2, the larger wetland adjacent to WGL to the west and south. The description of functions and values in the wetlands describes the losses that will result from the remediation of contamination at WGL. Detailed comments are provided in Attachment A.

The wetland delineation is not fully supported. While the procedure is described in Section 2.2, data are only provided for a few survey locations (WGL-W1 Wet 1, WGL-W1/2 Up1, WGL-W2 Wet 1, and WGL-W2 Wet 2). The determination of wetland/upland follows U.S. Army Corps guidance and is sufficiently supported for the plots where data are provided. Although it is clear that WGL-W1 and WGL-W2 have wetland characteristics (vegetation, hydrology, and soil), it is not clear how this handful of points delineates the wetland. Please enhance the explanation of how the wetland boundaries were determined (*i.e.*, how it was determined that there is no wetland adjacent to French's Stream, which is contrary to what is shown in Figure 3).

The area given for WGL-W1 is approximately 0.04 acres. From Figure 4, the wetland area appears to be 0.14 acres (~120 ft x ~50 ft = 6000 ft²). Is this because of a limitation within the GIS/graphics used? Please provide the dimensions of the wetland and explain why the wetland in the figure looks larger than 0.04 acres.

I look forward working with you and the Massachusetts Department of Environmental Protection to complete the remedial action at the WGL. 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

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

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>
p. 1-1, §1.0	Please add "and ecological receptors" to the end of the last sentence of the third paragraph.
p. 2-1, §2.2	The second paragraph refers to "potential wetlands" as starting points for sample plot pairs. Please explain how "potential wetlands" were identified.
p. 5-3, §5.1	<u>Wildlife Habitat</u> . The discussion does not mention amphibians. The discussion of previous functions (e.g., Fish and Shellfish Habitat) noted that the wetland could contain standing water for extended periods of time. Please discuss whether the wetland could provide amphibian breeding habitat in the spring.
p. 5-5, §5.2	<u>Groundwater Recharge/Discharge</u> . When considering functions that could be affected by excavation/filling of a wetland, it is not appropriate to assume that a function is not a principal one based on a lack of information, especially when there is information that suggests otherwise. In this case, if the WGL wetland constitutes a significant portion of "a limited recharge area" for the aquifer in French's Stream, recharge should be considered a principal function.
p. 5-7, §5.2	<u>Sediment/Shoreline Stabilization</u> . It is likely that the wetland provides some bank stabilization for French's Stream where the stream runs through or adjacent to the wetland (Figure 3). Figure 4 contradicts Figure 3 and shows that the wetland is not adjacent to the stream.
p. 5-7, §5.2	<u>Wildlife Habitat</u> . Please discuss whether wetland WGL-W2 could provide amphibian breeding habitat in the spring.
p. 5-7, §5.2	<u>Wildlife Habitat</u> . Has the Mystic Valley Amphipod been found in the WGL area?
p. 6-1, §6.1	The text refers to a net gain of wetland based on the 0.04 acre expansion of WGL-W2 relative to the loss of 0.03 acres of WGL-W1. The acreage of WGL-W1 is given elsewhere in the report as 0.04 acres, so there would not be a net gain. Please correct.
Appendix A	The Resource Delineation Field Form for WGL-W2 Wet 1 refers to the shallow root system of red maple as an indicator of wetland conditions. EPA recognizes that red maple is a FAC hydrophyte, but it should be noted that red maple roots are shallow even in dry areas.