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LETTER AND U S NAVY RESPONSE TO U S EPA REGION I AND MASSACHUSETTS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS REGARDING DRAFT  
FINAL PROPOSED PLAN MAIN GATE ENCROACHMENT AREA OF CONCERN NAS SOUTH  
WEYMOUTH ME  
06/22/2011  
TETRA TECH NUS



**TETRA TECH**

C-NAVY-06-11-4442W

June 22, 2011

Project Number G02073

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

Reference: CLEAN Contract No. N62470-08-D-1001  
Contract Task Order (CTO) No. WE11

Subject: Responses to Comments – Draft Proposed Plan  
Draft Final Proposed Plan  
Main Gate Encroachment Area of Concern  
Naval Air Station South Weymouth, Weymouth, Massachusetts

Dear Mr. Helland:

Enclosed are responses to comments (RTCs) received from the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MassDEP) on the draft Proposed Plan, Main Gate Encroachment Area of Concern, former Naval Air Station South Weymouth, Weymouth, Massachusetts. Also enclosed is the Draft Final Proposed Plan. The document has been revised consistent with the RTCs. A July to August 30-day public comment period and a July public meeting/hearing have been added; the dates for each will be determined based on input from EPA and MassDEP.

On behalf of the Navy, the RTCs and Draft Final Proposed Plan for the Main Gate Encroachment Area of Concern are being provided to the recipients listed below. An electronic version of the documents will be provided via email. If you have any questions regarding the document, please contact me at (978) 474-8403.

Very truly yours,

Phoebe A. Call  
Project Manager

PAC/lh

Enclosures

c: D. Barney, Navy (w/encl. – 1)  
C. Keating, EPA (w/encl. – 3)  
D. Chaffin, MassDEP (w/encl. – 1)  
D. Straker, TtNUS (w/encl. – 1)  
J. Trepanowski, TtNUS (w/encl. – 1)  
G. Wagner, TtNUS (w/encl. – RTCs only)  
G. Glenn, TtNUS (w/o encl.)  
File G02073-3.2 (w/o encl.); G02073-8.0 (w/encl. - 1)

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**NAVY RESPONSES TO U. S. ENVIRONMENTAL PROTECTION AGENCY (EPA)  
COMMENTS DATED JUNE 6, 2011  
DRAFT PROPOSED PLAN - MAIN GATE ENCROACHMENT AREA  
FORMER NAVAL AIR STATION SOUTH WEYMOUTH, WEYMOUTH, MASSACHUSETTS**

Navy's responses to the EPA comments dated June 6, 2011 on the draft Proposed Plan for the Main Gate Encroachment Area, Naval Air Station South Weymouth, Weymouth, Massachusetts (May 2011) are presented below. EPA's comments are presented first (in italics) followed by Navy's responses.

**Comment 1:** *Consistent with the text in "The Proposed Plan" section of the document, all references to the "Naval Air Station South Weymouth" and "NAS" should be preceded by the word "former."*

**Response:** The word "former" has been added to the text, preceding all references to the Naval Air Station (NAS) South Weymouth as suggested.

**Comment 2, Page 1 - The Proposed Plan:** *– Please amend the first sentence to read, "This document was prepared in accordance with federal law to present the Navy's proposed **No Further Action** decision for the Main Gate Encroachment Area of Concern (AOC) at the former Naval Air Station (NAS) South Weymouth...."*

**Response:** The text has been revised as suggested with the following change: "...for the Main Gate Encroachment Area of Concern (the Site) at the former Naval Air Station (NAS) South Weymouth...."

**Comment 3, Page 1 - Introduction:** *– Please amend the bullets after "The purpose of this plan is to:"*

- Provide information about ~~the~~ environmental investigations and removal actions completed at ~~the~~ Site;*
- Identify and explain ~~the Navy's~~ this Proposed Plan;*
- Encourage public review, ~~and~~ comments and involvement in this decision process.*
- ~~Provide information on how the public can be involved in the decision-making process.~~*

**Response:** In the introductory phrase preceding the bullets "Proposed Plan" was deleted and replaced with "document." The first and second bullets were left unchanged since the Navy believes they more aptly convey the intent of the document. The third and fourth bullets have been revised as suggested.

**Comment 4, Page 2 - Figure 1:** *– Although the EPA commends the Navy for its use of different colors and fonts to distinguish headings in the document and demarcate the location of the operable unit from the rest of the Base, the figure can be further improved by adding basic, helpful features to help orient the reviewed (e.g., Town names, Rt 18. etc.) The Navy should consider having two figures; one with a map that doesn't show the whole base outline but zooms in on the site and another with a map of the base boundary for comparison.*

**Response:** Figure 1 has been modified to include the town names and boundaries, as well as the nearby referenced streets. Since the existing Figure 4 shows a detailed view of the site, no additional figures have been added.

**Comment 5, Page 2 - The CERCLA Process..., 2<sup>nd</sup> ¶, last sentence:** *– Please delete "PAHs" and insert "Polycyclic Aromatic Hydrocarbons (PAHs)."*

**Response:** The acronym "PAHs" on page 2 was replaced with "polycyclic aromatic hydrocarbons (PAHs)".

**Comment 6, Page 2 - CERCLA Process..., 3<sup>rd</sup> ¶, 2<sup>nd</sup> sentence:** *- Please delete "the" before "EPA" and insert "CERCLA" prior to "removal action."*

**Response:** The text has been revised as suggested.

**Comment 7, Page 2 - Site Background and ..., 1<sup>st</sup> ¶:** - Please insert “abutters” prior to “property line” in the second to last sentence and replace “abutters property line” in the last sentence with “fencing.”

**Response:** The text in the second to last (third) and last sentences was edited as follows: “The Site is bounded by Navy property on the north ..... and a newly-installed fence to the south, along the abutter’s property line. The encroachment onto Navy property was approximately 100 feet north of the fencing.”

**Comment 8, Page 3 - Site Background and ..., 1<sup>st</sup> ¶, last sentence:** – Please insert “, without the Navy’s permission,” after “were stored” and prior to “on Navy property.”

**Response:** The text has been revised as suggested.

**Comment 9, Page 3 - Site Background and ..., 2<sup>nd</sup> ¶, 1<sup>st</sup> sentence:** – Please insert, “has been” after “new fence” and prior to “installed along the property line.”

**Response:** The text has been revised as suggested.

**Comment 10, Page 3 - Environmental Investigations, 2009-2010:** – Please insert “under CERCLA” after “EE/CA” and prior to “to determine the most appropriate.”

**Response:** The text has been revised as suggested.

**Comment 11, Page 3 - Environmental Investigations, 2011:** – Please insert “under CERCLA” after “NTCRA” and prior to “to remove impact soil...”

**Response:** The text has been revised as suggested.

**Comment 12, Page 4 - 2008 Field Investigation, 2<sup>nd</sup> bullet:** – Please delete “Hydrocarbons” and insert “Polycyclic Aromatic Hydrocarbons (PAHs).”

**Response:** The heading “Hydrocarbons” in the referenced text refers to the analysis for Extractable Petroleum Hydrocarbons and not to PAHs. The heading was therefore changed to “Extractable Petroleum Hydrocarbons” to reflect this analysis and to minimize confusion.

**Comment 13, Page 4 - 2010 EE/CA, 1st sentence:** – Please insert “(NTCRA)” at the end of the sentence.

**Response:** NTCRA was already defined in the second paragraph of the second column on page 2 where it was first used. Therefore, the text “non-time critical removal action” has been replaced with “NTCRA” at the end of the first sentence.

**Comment 14, Page 4 - 2010 EE/CA, Last ¶:** – “Cleanup Goal(s)” should be defined, either in the text or in the “Glossary of Terms” at the end of the document. For example, the language could read, “Cleanup Goals are determined through a careful risk analysis process. It is a number derived from an assessment that considers a variety of factors about how a human, or organism, could be exposed to a chemical and how likely that exposure is, depending on where or how much is in the environment. The cleanup goal is the level at which the chemical is unlikely to cause harm in that particular environment (these goals may differ between soil, sediment, air or water), and is therefore considered acceptable to be left or monitored thereafter.”

**Response:** The following definition of the cleanup goals from the EE/CA has been added to the text: “The cleanup goals shown in the tables below were developed and discussed in the EE/CA. The cleanup goal for protection of human health is to prevent exposure to, or remove, COC concentrations in soil and sediment which exceed select human health risk-based criteria and applicable Base background

concentrations. The cleanup goal for protection of the environment is to prevent exposure to, or remove, COC concentrations in surface soil (0-1 ft) and sediment which exceed ecological risk-based criteria and applicable Base background concentrations.”

**Comment 15, Pages 4 and 5 - Chemicals of Concern Tables:** – EPA concurs with the DEP’s recommendation to add a site-maximum column to each of the tables.

**Response:** A column showing the maximum detected concentrations has been added to each of the “Chemicals of Concern” tables as suggested.

**Comment 16, Page 6 - Rationale for the NFA Proposal:** – This section should also explain why there is, or isn’t, a need for a Five-Year Review under CERCLA.

**Response:** The following text has been added as a third bullet in the referenced section:

- Because no hazardous substances, pollutants, or contaminants remain at the site in excess of levels that allow for unlimited use and unrestricted exposure, five-year reviews are not required.

**NAVY RESPONSES TO  
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION (MASSDEP)  
COMMENTS DATED MAY 13, 2011  
DRAFT PROPOSED PLAN - MAIN GATE ENCROACHMENT AREA  
FORMER NAVAL AIR STATION SOUTH WEYMOUTH, WEYMOUTH, MASSACHUSETTS**

Navy's responses to MassDEP comments dated May 13, 2011 on the draft Proposed Plan for the Main Gate Encroachment Area, Naval Air Station South Weymouth, Weymouth, Massachusetts (May 2011) are presented below. The MassDEP's comments are presented first (in italics) followed by Navy's responses.

**Comment 1, Pages 4 and 5, Chemicals of Concern Tables:** *I suggest adding a site-maximum column to each table to provide an indication of the magnitude of risk reduction accomplished by the removal action.*

**Response:** A column showing the maximum detected concentrations has been added to each of the "Chemicals of Concern" tables as suggested.

**Comment 2, Page 6 Left Column, Last Paragraph:** *I suggest additional explanation about decisions to accept exceedances: an insignificant risk exceedance for soil, confirmed by screening, and for sediment, structural and encroachment concerns along Rt. 18 and acceptable risk.*

**Response:** Additional information about the decision to accept exceedances, based on structural and encroachment concerns and the results of the risk screening has been added to the referenced section.

**Comment 3, Page 6 Right Column, "Conclusions":** *The phrase "...have been mitigated..." is ambiguous and indirect. I suggest revising this paragraph to more simply state the conclusion that the removal action reduced chemical concentrations sufficiently to eliminate unacceptable risks.*

**Response:** The text has been revised as suggested.