

N00101.AR.002564
NAS SOUTH WEYMOUTH
5090.3a

LETTER AND U S NAVY RESPONSE TO AGENCIES COMMENTS REGARDING DRAFT
RECORD OF DECISION FOR MAIN GATE ENCROACHMENT AREA AND TRANSMITTAL OF
DRAFT FINAL VERSION NAS SOUTH WEYMOUTH MA

08/29/2011
TETRA TECH NUS



TETRA TECH

C-NAVY-08-11-4555W

August 29, 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 Record of Decision
Draft Final Record of Decision
Main Gate Encroachment Area
Former 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 Record of Decision (ROD) for the Main Gate Encroachment Area, at the former Naval Air Station (NAS) South Weymouth in Weymouth, Massachusetts. The ROD has been revised to incorporate the responses to the EPA and MassDEP comments and includes the Responsiveness Summary. The draft final ROD with the changes shown in yellow highlighting is also enclosed.

On behalf of the Navy, RTCs and the draft final ROD for the Main Gate Encroachment Area are being provided to the EPA and MassDEP. 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, Tetra Tech (w/encl. – 1)
J. Trepanowski, Tetra Tech (w/o encl.)
G. Glenn, Tetra Tech (w/o encl.)
G. Wagner, Tetra Tech (w/encl. – RTCs only)
File G02073-3.2 (w/o encl.); G02073-8.0 (w/encl. - 1)

Tetra Tech

250 Andover Street, Suite 200, Wilmington, MA 01887-1048
Tel 978.474.8400 Fax 978.474.8499 www.tetrattech.com

**NAVY RESPONSES TO U. S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS
(DATED JULY 2011)
RECORD OF DECISION
MAIN GATE ENCROACHMENT AREA (MGEA)
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

Navy responses to the EPA comments dated July 2011 on the draft Record of Decision for the Main Gate Encroachment Area are presented below. EPA's comments are presented first (in italics) followed by Navy's responses.

GENERAL COMMENT

Comment 1: *The current Table 2-2 should be deleted and replaced with three, separate tables, (one for soil, one for sediment, and one for groundwater) to more clearly show the maximum concentration of each COC (pre- and post- removal) and the corresponding sample location/ID, the applicable cleanup goal for the COC, and the basis for the cleanup goal (i.e., background, human health- or ecological-based levels, MCLs, MCP S-1/GW-1 criteria, etc.). This also obviates the need to include chemical data on Figures 2-3 and 2-4 (which is currently too small and difficult to read). EPA recommends that the pre-removal soil, sediment, and groundwater locations (exceeding background values and/or risk-based criteria) be combined into a single figure, with sample location/IDs that correspond to those identified in the new, media-specific data tables. Reference to the new tables should be incorporated throughout the document, where appropriate. A complete summary of all sampling results, compared to the applicable screening criteria, should still be included in Appendix C.*

Response: Table 2-2 has been split into two tables: one for sediment and one for soil. Each table includes the COCs, the pre-removal maximum concentration, the cleanup goal, basis for the cleanup goal, and the post-removal maximum concentration, excluding the sidewall locations along the abutter's property line. Figures 2-3 and 2-4 have been enlarged so the data are easier to read. The sample location of the pre-removal maximum concentrations will not be included in the tables, since the data are shown on Figure 2-3. The Navy does not believe the location of the post-excitation maximum concentrations needs to be included in the tables. References to the tables will be adjusted accordingly. Please also see the Response to MassDEP Comment #2.

As noted in Section 2.7.1 of the ROD, no action for groundwater was proposed in the EE/CA. Therefore there are no COCs or cleanup goals. However, Table 4 from the Groundwater Technical Memorandum has been referenced in Section 2.7.3 of the ROD and has been added to Appendix C to show the pre-removal and post-removal groundwater data.

SPECIFIC COMMENTS

Comment 2, Page 6, Table 2-1, EE/CA, Activities: *Please delete "PAHs" and insert, "SVOCs, primarily PAHs, and pesticides in soil and sediment."*

Response: The text has been revised as suggested.

Comment 3, Page 6, Table 2-1, NTCRA, Activities: *Please delete the last sentence and insert, "Approximately 1,700 cubic yards of soil and sediment were removed from the property, characterized, and transported off-site for a licensed disposal facility. The excavated areas were backfilled with clean fill and topsoil and reseeded."*

Response: The last sentence has been replaced by the following text: "Once the excavation activities were completed, the excavated areas were backfilled with clean fill and topsoil and reseeded. Approximately 1,700 cubic yards of stockpiled soil and sediment were characterized and transported off-site to a licensed disposal facility."

Comment 4, Page 7, Section 2.4, ¶ 2: Please delete “PAHs” and insert, “SVOCs, primarily PAHs,” in the last sentence.

Response: The text has been revised as suggested.

Comment 5, Page 8, Section 2.5.2: Please insert the following text at the end of the first paragraph, “A complete summary of sediment, surface and subsurface soils, and groundwater results, compared to the referenced criteria, is included in Appendix C.”

Response: The text has been revised as suggested.

Comment 6, Page 8, Section 2.5.2, Soil and Sediment: Please delete reference to “Figure 2-3” in both paragraphs and replace with “Tables 2-2 and 2-3” (the media-specific data tables to be created in response to Comment 1. above).

Response: As noted in the Response to Comment 1, Figure 2-3 has been enlarged so the data can be more clearly seen. The reference to Figure 2-3 has been retained. Please note that Tables 2-2 and 2-3 are presented in Section 2.7 and discussed in the context of the EE/CA and NTCRA; the pre-removal concentrations show the success of the removal action in comparison to the cleanup goals and post-removal concentrations. It is not appropriate to reference the tables in Section 2.5, which is a discussion of site characteristics based on the 2008 site investigation.

Comment 7, Page 8, Section 2.5.2, Soil and Sediment: Please amend the last full sentence on this page to read, “... as shown on Figure 2-3. Tables 2-2 and 2-3, and in the data summary tables included in Appendix C.”

Response: The sentence has been revised as follows: “...as shown on Figure 2-3 and in the data summary tables included in Appendix C.” Please see the Response to Comment #6 above.

Comment 8, Page 9, Figure 2-3: See Comment 1. above.

Response: Please see the Response to Comment #1.

Comment 9, Page 9, Section 2.5.2, Groundwater: Please change “... are presented on Figure 2-4” to “... are shown on Figure 2-3.”

Response: Please see the Response to Comment #1.

Comment 10, Page 10, Figure 2-4: See Comment 1. above.

Response: Please see the Response to Comment #1.

Comment 11, Page 10, Section 2.6, ¶ 2: Please amend the last sentence to read, “Residential use is not currently planned for the MGEA site.” This statement should be confirmed with SSTTDC/LNR to ensure it’s consistent with the current reuse plan.

Response: The zoning was checked with J. Young, SSTTDC, on May 13, 2011. He clarified that the majority of the site is in the Shea Village Commercial District (SVCD) and approximately 25 feet along the eastern boundary of the site is zoned as open space. The references to zoning or future land use on pages 2, 10 and 15 in the ROD have been corrected to reflect this clarification. According to the SSTTDC Zoning and Land Use By-Laws, the SVCD-allowed uses include light industry, biopharmaceutical manufacturing, research and development, office and other commercial uses. No residential uses are included in the SVCD. The sentence has not been changed.

Comment 12, Page 10, Section 2.6, ¶ 3: Please amend the last two sentences to read, “Currently, there are no public water supply wells located on the site. The Town of Weymouth currently supplies municipal

water to the entire area.” Until issues relevant to the reuse plan, aquifer designations, and potential impacts from nearby AOCs are resolved, language pertaining to the future use of groundwater at the Base as a drinking water source should be omitted.

Response: Both SSTDC and LNR have consistently stated that there are no plans to use groundwater as a drinking water source, most recently at the July 27, 2011 BCT meeting. The two sentences have been revised as follows: “Currently, there are no public water supply wells located on the Site and the Town of Weymouth supplies the water for the ongoing phase of development. SSTDC and the developer have no plans to use groundwater as a drinking water source in the future.”

Comment 13, Page 11, Section 2.7.1, ¶ 2: *For reasons discussed above, this paragraph should be amended to read, “Because groundwater associated with the MGEA site is not a drinking water source and is not classified as a potential drinking water aquifer, no action directly related to groundwater was proposed in the EE/CA. However, the EE/CA did recommend that a round of groundwater samples be collected approximately three months after completion of the excavation activities, to evaluate pre- and post-removal action conditions (see Section 2.7.3).” Statements relevant to future groundwater use in this area should be confirmed with SSTDC/LNR and MassDEP to ensure it’s consistency with the current reuse plan and the State’s groundwater classification and CSGWPP.*

Response: Please see the Response to Comment #12. The paragraph has been revised as follows: “Because groundwater associated with the MGEA site is not a drinking water source, is not classified as a potential drinking water aquifer, and the two PAH exceedances were the same order of magnitude as the MCLs and MCP GW-1 standards, no action directly related to groundwater was proposed in the EE/CA. However, the EE/CA recommended that a round of groundwater samples be collected approximately three months after completion of the excavation activities to evaluate pre- and post-removal action conditions (see Section 2.7.3).”

Comment 14, Page 11, Table 2.2: *See Comment 1. above.*

Response: Please see the Response to Comment #1.

Comment 15, Page 13, Section 2.7.3: *Please amend the first sentence to read, “Although no action directly related to groundwater was proposed, groundwater samples were collected from existing monitoring wells in June 2011 to evaluate post-removal conditions.”*

Response: The suggested change has been made.

Comment 16, Page 13, Section 2.7.3: *Please check the reference to “2008 SI data”; the proposed plan refers to “2007” SI data.*

Response: The Proposed Plan referred to a 2007 site inspection and a 2008 field investigation, or initial site investigation. Analytical data were collected in 2008. The reference in the ROD to ‘2008 SI data’ is correct.

**NAVY RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION
(MASSDEP) COMMENTS (DATED JULY 14, 2011)
RECORD OF DECISION
MAIN GATE ENCROACHMENT AREA (MGEA)
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

Navy responses to the MassDEP comments on the draft Record of Decision for the Main Gate Encroachment Area are presented below. MassDEP's comments are presented first (in italics) followed by Navy's responses.

Comment 1, Table 2-1: *I suggest deleting the clean fill and topsoil quantities from the description of NTCRA activities because the soil and sediment removal quantities were not provided in the table and all quantities are subsequently listed in the ROD (p. 12). Alternatively, for consistency, the soil and sediment quantity could be added to Table 2-1.*

Response: The last sentence that contained the fill quantities has been deleted and replaced with the following text: "Once the excavation activities were completed, the excavated areas were backfilled with clean fill and topsoil and reseeded. Approximately 1,700 cubic yards of stockpiled soil and sediment were characterized and transported off-site to a licensed disposal facility."

Comment 2, Table 2-2: *I suggest adding columns with post-removal maximum concentrations (excluding results from samples collected along the south wall of the soil excavation) and a brief reference to those concentrations in the next to last final paragraph of Section 2.7.2. This would be helpful because it would clarify the meaning of "results slightly exceeded cleanup goals", support the statements concerning the results from the risk screening evaluation without adding the risk screening evaluation to the ROD, and conveniently document what remains at the site for future reference.*

Response: Table 2-2 has been divided into two separate tables, one for soil (Table 2-2) and one for sediment (Table 2-3). The two tables include pre- and post-removal maximum concentrations along with the selection basis for the cleanup goal for each identified COC. The text in Section 2.7.2 was edited to discuss the table changes and to clarify the residual concentration exceedances relative to the risk screening evaluation. Please also see the Response to EPA Comment #1.

Comment 3, Page 12, First Paragraph: *I suggest adding "(Grid 009)" after "separate swale in the center of the encroachment area" to be consistent with preceding text and provide a reference point in Figure 2-5.*

Response: The text has been edited as suggested.

Comment 4, Page 12, Last Paragraph: *To enhance the description of conditions at the conclusion of the removal action, I suggest that the fence installed on the south side of the site be mentioned to supplement the text concerning the soil berm (both structures serve to prevent recontamination of the site) and, if it's not too much effort, I suggest that a photo of the restored site be added to the ROD (could provide a convenience reference if the abutter encroaches in the future).*

Response: As recommended, a photograph of the restored site (Figure 2-6) has been added to show post-restoration conditions and the following text has been added to the second sentence in the last paragraph of Section 2.7.2: "The chain link fence that was erected along the Navy/abutter's property line was left in place, a soil berm was constructed, and the site was graded.....property."

Comment 5, Appendix B: *The third reference should be deleted or corrected; it is the same as the first reference.*

Response: The third reference has been deleted from the list of references in Appendix B.