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U S NAVY RESPONSE TO U S EPA AND MASSACHUSETTS DEPARTMENT OF  
ENVIRONMENTAL PROTECTION COMMENTS TO DRAFT RIA 10C DECISION DOCUMENT  
WITH TRANSMITTAL NAS SOUTH WEYMOUTH MA  
11/09/2009  
TETRA TECH NUS



**TETRA TECH**

C-NAVY-11-09-3386W

November 9, 2009

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: Review Item Area 10C – Hangar 1 North and South Lean-Tos  
Responses to Comments and Draft Final Decision Document  
Naval Air Station South Weymouth, Weymouth, Massachusetts

Dear Mr. Helland:

Tetra Tech NUS, Inc. (TtNUS) has prepared Responses to Comments (RTCs) received from the U.S. Environmental Protection Agency (EPA) and Massachusetts Department of Environmental Protection (MassDEP) on the draft Decision Document for Review Item Area 10C, Hangar 1 North and South Lean-Tos, Naval Air Station South Weymouth, Weymouth, Massachusetts. The changes noted in the RTCs have been incorporated into the document. The draft final Decision Document is enclosed along with the RTCs.

Through copy of this letter, the Review Item Area 10C RTCs and draft final Decision Document are being provided to the recipients listed below. Any questions regarding this submittal should be directed to your attention at (215) 897-4912. Please contact me at (978) 474-8403 should you have any questions.

Very truly yours,

Phoebe A. Call  
Project Manager

PAC/lh

Enclosure

c:

D. Barney, Navy (w/encl. – 1 paper copy, 1 CD)  
B. Capito, Navy (w/o encl.) (electronic)  
K. Keckler, EPA (w/encl. – 2 paper copies)  
D. Chaffin, MADEP (w/encl. – 1 paper copy, 1 CD)  
P. Golonka, Gannett Fleming (w/encl. - 2 paper copies)  
Y. Walker, Navy and Marine Corps Public Health  
Center (w/encl. – 1 CD)  
P. Sortin, Abington (w/encl. – 1 CD)  
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File G02073-3.2 (w/o encl.); G02073-8.0  
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**NAVY RESPONSES TO U. S. ENVIRONMENTAL PROTECTION AGENCY (EPA)  
COMMENTS DATED JULY 10, 2009  
DRAFT RIA 10C DECISION DOCUMENT (DECEMBER 1, 2004)  
NAVAL AIR STATION SOUTH WEYMOUTH, WEYMOUTH, MASSACHUSETTS**

Navy responses to the EPA comments on the Draft RIA 10C Decision Document are provided below. The EPA comments are presented first (in italics) followed by Navy's responses.

**Comment 1:** *EPA is waiting for responses to our comments on the 2004 Decision Document and the Final Removal Action Report.*

*For the Final RA Report (June 2004), I don't think EPA questioned the completeness of the removal action but there are a few points of clarification that need to be addressed. The only substantive issue was clarification of locations of the discharge locations for all drainage systems. This was supposed to be addressed in the Decision Document but wasn't.*

**Response:** Navy has no record of receiving EPA comments on the 2004 draft Decision Document. Please resend as available.

A review of the NAS South Weymouth storm drain plan indicates that catch basins located in the vicinity of Hangar 1 discharge into the storm water system, which terminates at the TACAN outfall. This information has been added to the draft final Decision Document.

In addition, historic plans for the lean-tos were reviewed and remaining interior pipelines and associated floor drains were determined to be associated with either the sewer or the storm drain systems. Information has been added to the draft final Decision Document describing connections to the storm drain or sanitary systems located in the North and South Lean-Tos.

**Comment 2:** *For the Decision Document (December 2004), the analytical data for soil and groundwater did not indicate a problem, but there were questions about adequacy of site characterization (and possible data gaps). The locations of the two soil and four groundwater samples relative to the potential sources was not always clear (e.g., MW05-305 may not have captured a potential release from the Plating Facility and it is not clear if soil samples were located below the degreaser). EPA also asked for information about the extent of misaligned joints in the piping systems (unresolved issue from the Removal Action Report).*

**Response:** The locations of the two soil and four groundwater samples were discussed in EBS meetings conducted in May 8 and July 1, 2003. Samples were located to assess areas downgradient of the North and South Lean-Tos. MW05-305 is downgradient of the plating room and other portions of the North Lean-To. MW05-306 is downgradient of the Acid UST and Electronic & Instrument Shop. MW05-307 is downgradient of the Photo Finishing room. MW05-308 is downgradient of the Hydraulic Shop and Crash Truck Garage. The 2004 soil borings were taken from soil in the vicinity of the two degreasers. This information has been added to the Decision Document.

In addition, a former uses table has been included in the draft final Decision Document as Attachment A. A new figure (Figure 2) was created that shows the approximate locations of potential source areas in the north and south lean-tos. A review of the figures and table, now included in Attachment A, by Navy and regulators determined that there were no additional areas or potential sources that required sampling. The Prop Shop was remediated because of the presence of a hydraulic lift in ground with tank and controls.

The March 2003 video inspection of the drain lines in the North Lean-To revealed that the pipe system was in good condition and the only misaligned joints were observed in the Plating Shop. This information has been added to the draft final Decision Document.

**Comment 3:** *Although Risk Assessments were not conducted for RIA 10C, EPA is awaiting a revised HHRA for Hangar 1 (as discussed on 5/28/09).*

**Response:** A draft Streamlined Human Health Risk Assessment for Hangar 1 was issued on October 14, 2009.

**NAVY RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION  
(MASSDEP) COMMENTS (DATED DECEMBER 23, 2004)  
DRAFT RIA 10C DECISION DOCUMENT (DECEMBER 1, 2004)  
NAVAL AIR STATION SOUTH WEYMOUTH, WEYMOUTH, MASSACHUSETTS**

Navy responses to the MassDEP comments on the Draft RIA 10C decision document are provided below. The MassDEP's comments are presented first (in italics) followed by Navy's responses.

**Specific Comment 1:** *Section 1.2: The decision document should identify any remaining floor drains and associated pipelines in the lean-tos and explain why those drains and pipelines were not removed during the 2003 removal action (the decision document indicates that 1,455 feet of an estimated 2,240 feet of pipeline were removed).*

**Response:** The 2,240 feet of piping removed was an estimate based on a review of Navy drawings; 1,445 feet were actually removed. Historic plans for the lean-tos were reviewed and remaining pipelines and associated floor drains are associated with sewer and storm drain systems. Second floor piping was not removed as part of the removal action.

**Specific Comment 2:** *Section 2.1: To demonstrate that sufficient sampling was conducted to assess all of the potential contaminant sources in the lean-tos, the decision document should: (1) identify all of the potential source areas (e.g., include the cited figure depicting the former uses and potential source areas), and (2) identify the samples that were used to assess each potential source area or explain why sampling was determined not to be necessary (e.g., the Prop Shop in the north lean-to was remediated under the MCP).*

**Response:** The former uses table has been included in the draft final Decision Document as Attachment A. A new figure (Figure 2) was created that shows the approximate locations of potential source areas in the north and south lean-tos. A review of the figures and table, now included in Attachment A, by Navy and regulators determined that there were no additional areas or potential sources that required sampling. The Prop Shop was remediated because of the presence of a hydraulic lift in ground with tank and controls.

As indicated in the Draft Decision Document, sample locations were discussed in EBS meetings conducted in May 8 and July 1, 2003. Samples were located to assess areas downgradient of North and South Lean-Tos.

MW05-305 is downgradient of the plating room and other portions of the north lean-to. MW05-306 is downgradient of the Acid UST and Electronic & Instrument Shop. MW05-307 is downgradient of the Photo Finishing room. MW05-308 is downgradient of the Hydraulic Shop and Crash Truck Garage. The 2004 soil borings were taken from soil in the vicinity of the two degreasers. This information has been added to the Decision Document.

**Specific Comment 3:** *Section 2.1: Additional response actions may be necessary under the MCP or CERCLA if the recently discovered UST is determined to be a source of a release of oil or hazardous material.*

**Response:** A 175-gallon UST was removed south of the South Lean-To in May 2005. A final removal action report documented the removal and a NFA status was assigned to this action. Text has been added to the draft final Decision Document referencing this action and the removal action report.

**Specific Comment 4:** *Section 2.1.1: The decision document should identify the potential contaminant sources that were assessed using the results from the 2003 samples.*

**Response:** Information has been added to Section 1.2 based on the former uses table and review of Navy drawings. See also the Response to Specific Comment 2 above.

**Specific Comment 5:** *Section 2.1.2 indicates that samples SB05-309(3-5) and SB05-310(7-9) were analyzed for pesticides and PCBs; however, the decision document does not include the results from these analyses (e.g., refer to Table 10C-3 and Appendix 10C-3). Please reconcile.*

**Response:** The samples were not analyzed for pesticides and PCBs. Section 2.1.2 has been corrected.

**Specific Comment 6:** *Section 2.5: The decision document should include the water level data used to prepare Figures 8 and 9, or cite a separate document that presents the data.*

**Response:** The water level data used to prepare Figures 8 and 9 was included in the RIA 12 decision document. This document has been cited in Section 2.5.

**Specific Comment 7:** *Figure 1: RIA 10C should include the entire footprint of both lean-tos or the definition of RIA 10C (refer to Section 1.2) should be changed (both lean-tos extend approximately 200 feet west of the area depicted and the south lean-to may extend east of the indicated area).*

**Response:** The entire footprint of both lean-tos in RIA 10C is included in the draft final Decision Document as suggested. See the new Figure 2.

**Specific Comment 8:**

*Figure 2: The figure should identify the locations of the specific potential contaminant sources assessed by the samples presented in the figure.*

**Response:** A new Figure 2 has been prepared that shows this information.

*The figure indicates that samples SB05-309(3-5) and SB05-310(7-9) were not collected at the former locations of the north and south lean-to degreasers; consequently, additional sampling may be necessary to assess the degreasers.*

**Response:** Historic Hangar 1 plans (Bureau of Yards and Docks drawings number 594554 and 594556, 1953) were reviewed to ascertain the position of the two former degreasers in the north and south lean-tos. Sample locations SB05-309 and SB05-310 were adjusted on Figure 2 to correspond with the degreaser locations depicted on historic plans.

*The figure should include the location of the acid UST associated with the battery room in the east end of the south lean-to.*

**Response:** The acid UST location has been added to the figure.

**Specific Comment 9:** *Figure 7: The indicated groundwater flow directions suggest that analytical results from groundwater samples collected in monitoring well MW05-304 should be included in the decision document to assess the potential contaminant sources located in the west end of the south lean-to (e.g., degreaser and parachute packing area).*

**Response:** MW05-304 was installed as part of a separate Hangar 1 sample effort. The data from this well was used in the Streamlined Human Health Risk Assessment for Hangar 1, submitted on October 14, 2009.

**Specific Comment 10:** Appendix 10C-6: The upper photograph appears to document the installation of MW05-308 (rather than MW06-308) and the lower photograph appears to be a second view of the installation of MW05-308 (rather than MW06-306).

**Response:** The captions for the photographs have been changed as suggested. Note this appendix is now Appendix F.

**Specific Comment 11:** DEP requests an opportunity to conduct a visual inspection of RIA 10C to review sample locations.

**Response:** A site walk-through was conducted on June 30, 2005.