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U S NAVY RESPONSE TO REGULATOR COMMENTS TO DRAFT FEASIBILITY STUDY REPORT BUILDING 82 WITH TRANSMITTAL NAS SOUTH WEYMOUTH MA
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PITT-09-10-061

September 23, 2010

Project Number 112G02073

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: Response to Comments, Draft Feasibility Study Report for Building 82
Draft Final Feasibility Study Report for Building 82
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 previous Navy RTCs on the draft Feasibility Study (FS) Report for Building 82, Naval Air Station South Weymouth, Weymouth, Massachusetts. The FS Report has been revised in accordance with all the RTCs. The draft final FS Report is enclosed along with the RTCs.

Through copy of this letter, the RTCs and draft final FS Report are being provided to the recipients listed below. Any questions regarding the document 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,

Joseph T. Logan for

Phoebe A. Call
Project Manager

PAC/clm

Enclosures

c: D. Barney, Navy (w/encl. – 1 paper, 1 CD)
K. Keckler, EPA (w/encl. – 3 paper, 1 CD)
D. Chaffin, MassDEP (w/encl. – 1 paper, 1 CD)
P. Golonka, Gannett Fleming (w/encl. – 1 paper, 1 CD)
Y. Walker, Naval Environmental Health Center (w/encl. – 1 CD)
P. Sortin, Abington (w/encl. – 1 CD)
D. McCormack, Weymouth (w/encl. – 1 CD)
M. Parsons, Rockland (w/encl. – 1 CD)
Tufts Library, Weymouth (w/encl. – 1 CD)
Public Library, Abington (w/encl. – 1 CD)
Public Library, Rockland (w/encl. – 1 CD)
Public Library, Hingham (w/encl. – 1 CD)
Chief Executive Officer, South Shore Tri-town Development Corp. (w/encl. – 1 paper, 1 CD)
R. Daniels, LNR Property Corp. (w/encl. – 1 CD)
J. Logan, TtNUS (w/encl. – 1 paper)
J. Trepanowski, TtNUS (w/o encl.)
G. Glenn, TtNUS (w/o encl.)
File G02073-3.2 (w/o encl.);
G02073-8.0 (w/encl. - 1 each)

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NAVY RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS (DATED JUNE 22, 2010) DRAFT FEASIBILITY STUDY, BUILDING 82 NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS

Responses to the EPA comments on the Navy's May 11, 2010 Responses to Comments (RTCs) on the Draft Feasibility Study for Building 82 are presented below. The EPA comments are presented first (in italics) followed by Navy's responses.

LETTER COMMENTS

Comment: *EPA has also made edits to the revised ARARs tables and included them in Attachment B. The table numbering will likely need to be corrected to comport with the FS. Tables 4-3, 4-6, and 4-9 identify EPA vapor guidance for 'assessment and mitigation of potential vapor intrusion risks' but Tables 4-2, 4-5, and 4-7 do not identify any chemical-specific vapor risk ARARs or TBCs. If no vapor risk was identified in the FS it is unclear why there is an action-specific ARAR for vapor. Please check to see if Massachusetts has any vapor standards that should be cited either as chemical or action-specific ARARs.*

Response: The ARAR tables have been revised and slightly edited, consistent with the EPA markups. They have also been renumbered. The vapor intrusion guidance has been deleted.

Comment LC2: *Based on other EPA comments on the Draft FS, the proposed revision to the RAOs should reference all chemicals with PRGs. Please update the RAOs accordingly.*

Response: The RAOs have been revised and include a reference Table 2-4, which includes PRGs for the listed COCs.

Comment LC4: *Because 1,1,1-trichloroethane (1,1,1-TCA) was detected at a concentration exceeding its MCL, it needs to be retained as a chemical of concern. It is not sufficient to identify it as a chemical of interest. The daughter products of TCE and 1,1,1-TCA may be identified as chemicals of interest with PRGs if their presence is assumed but they have not been detected to date. Please revise the FS accordingly.*

EPA does not agree with the use of the term "compound of interest" under CERCLA. It is essential that TCE, and its daughter product 1,1,1-TCA, are considered in remedial programs unless they are identified as a compound of concern. EPA agrees that 1,1,1-TCA should be considered in the development of remedial alternatives and in any aspects of long-term monitoring for the alternatives.

Response: Chemicals of concern for Building 82 were identified in the risk assessments and PRGs have been developed for these chemicals. Per EPA's *Guidance for Comparing Background and Chemical Concentrations in Soil for CERCLA Sites*, "Chemicals (or constituents) of concern (COCs) are the hazardous substances, pollutants, and contaminants that, at the end of the risk assessment, are found to be the risk drivers or those that may actually pose unacceptable human or ecological risks." Although the concentration of 1,1,1-TCA does not result in an unacceptable risk, this compound will be identified as a COC because the concentration is greater than its MCL.

Navy has also developed PRGs for TCE daughter products. The groundwater data show that most monitoring wells do not have detected concentrations of the daughter products. Since these chemicals do not contribute to site risk, they continue to be referred to as chemicals of interest (COIs). Note that the alternatives consider both COCs and COIs. A discussion of the COIs has been added to Section 2.2.2.

Comment LC9: *Is there sufficient information regarding the PCB sampling to discern whether the PCBs have not just moved downgradient? What downgradient sampling was performed to justify the elimination of PCBs?*

The RI Addendum needs to comprehensively assess the TCE plume discovered between Buildings 82 and

81 in consideration of the three-dimensional groundwater data on an appropriate scale (i.e., including Buildings 82 and 81). In addition to the contaminant distribution data that has been provided, synoptic water level data need to be collected from overburden and bedrock monitoring wells in the new plume area, the Building 81 area, the Building 82 area, and other pertinent up- and down-gradient areas. Please update the CSM to include an evaluation of groundwater flow on this scale, as well as an assessment of the contaminant distribution in the new plume with respect to groundwater flow. Additional long-term monitoring points will likely be required in subsequent phases of work to the extent that the current monitoring network is not sufficient. Specifically, permanent monitoring points are limited in key areas of the new plume and additional control is needed in shallow overburden, deep overburden, and bedrock.

Response: The results of the re-sampling effort suggest that PCBs are sorbed to the soil matrix and are not in solution. The RI Addendum includes a discussion of the PCB data from both 2006 and 2009. Note that PCBs will be included in the groundwater monitoring component of the selected site remedy. The RI Addendum presents the results of the additional TCE investigation and a CSM discussion. Navy plans to consider the issues discussed in the comment during the remedial design phase and development of the groundwater monitoring component of the selected site remedy.

Comment LC10: *EPA disagrees that "…extenuating circumstances…" per the OSWER 9355.0-30 quotation are absent. The example extenuating circumstance is exposure to multiple contaminants, which can occur at this site. Unless Navy can demonstrate that multiple contaminants in the same well do not occur, the PRGs must be set such that the total risk of all of the COCs is within EPA's risk criteria (see also LC17 and LC21).*

Moreover, the response actually confirms the information presented in EPA's comment – that cumulative risk supersedes MCLs when multiple COCs are present.

The MCL for vinyl chloride is based on the detection limit that was achievable approximately fifteen years ago. Current analytical methods have significantly lower detection limits. For example, Method 524.3, a drinking water method, lists a detection limit for vinyl chloride at 0.029 micrograms per liter (µg/L) with a lowest concentration minimum reporting level of 0.092 µg/L. Consequently, current technology has the potential to quantify vinyl chloride at the lower end of EPA's risk range.

Five-year reviews would have to evaluate the monitoring data to determine what chemicals are present at what concentrations and determine whether the remedy is protective. Cleanup to less than the MCLs could be indicated based on the cumulative risk associated with these data.

Additionally, EPA does not agree that "…Remedial processes that address TCE and cis-1,2-DCE generally address vinyl chloride too…." Biological degradation of TCE occurs most commonly in a reduced geochemical environment, whereas vinyl chloride is most amenable to degradation in an aerobic environment. As a result, vinyl chloride could persist even as TCE is degraded in certain remedial strategies. Any remedial strategies that rely on natural or enhanced biodegradation processes (e.g., enhanced reductive de-chlorination) will likely need to address VC. While it appears unlikely that the groundwater will be used for drinking water in the near-term, the NCP's expectation is to restore impacted groundwater to beneficial reuse.

Finally, please make the following changes to the LC10 table:

- *For clarity, cumulative risk based on the various target concentrations (MCLs, typical DLs, and 1/2 typical DLs) should be presented so that cancer risk and non-cancer risk values are clear. For example, the MCL risk for TCE is listed as 2.5E-6 and that for cis-1,2-DCE is listed as 0.19. These should be separated to clarify the cumulative cancer risk and the cumulative non-cancer risk.*

- *The listed RSL for 1,1-DCA is 9.9 ug/l. According to the May 2010 RSL table, the RSL should be 2.4 ug/l. Please adjust this table accordingly.*

- *The listed RSL for n-nitroso-di-n-propylamine is 0.0073 ug/l. According to the May 2010 RSL table, the RSL should be 0.0096 ug/l. Please adjust this table accordingly.*

- *The listed RSL for aroclor 1248 is 0.032 ug/l. According to the May 2010 RSL table, the RSL should be 0.034 ug/l. Please adjust this table accordingly.*

- *Please clarify which form of chloroethane is addressed in the sixth row and clarify where the HI=1 screening level of 21000 ug/L was found. EPA was unable to find this value in the RSL table.*

Response: Figures 2-1 and 2-2 of the FS indicate that with a few exceptions, one COC is typically shown at a given groundwater location and there is no well where all the COCs are present.

The Navy continues to maintain that the use of MCLs as PRGs is sufficient for this site (as is the case with other sites). In the cases where multiple COCs may potentially occur in a single well (for example 1,1,1-TCA and 1,1-DCA, or TCE/cis-1,2-DCE/VC), it must be recognized that the concentration of one COC will continue to decrease below its MCL while the concentration of another COC decreases toward its MCL. Thus, when the concentrations of all COCs in a given well have met their PRGs, the actual concentrations can be used to determine if the risk is within the EPA target range.

In general, there are many combinations of alternative PRG concentrations for multiple COCs that would sum to the target risk range. The decision of a selection of a sub-MCL PRG for one COC vs. another COC would be entirely arbitrary. It could lead to a long-term situation where the actual concentrations of COCs yield an acceptable risk level, but one of the COCs is at a concentration greater than the sub-MCL PRG but less than the MCL. (However, in this particular case, the MCL of only one compound, vinyl chloride, has a significant effect on the total risk based on PRGs.)

The example risk table has been revised using the July 2010 RSLs and is attached to these RTCs. In the original version, the RSLs were taken from the table prior to the recent May 2010 and July 2010 revisions. Chloroethane can be found by its synonym ethyl chloride.

Vinyl chloride biologically degrades under both aerobic and anaerobic conditions. Therefore, the statement in the previous response to comments - "Remedial processes that address TCE and cis-1,2-DCE generally address vinyl chloride too" – is accurate.

Comment LC11: *EPA disagrees with the assertion that the manganese UCL of the shallow groundwater (3170 ug/l) is not significantly greater than background (2680 ug/l). EPA has not accepted the Navy's background number for manganese and believes that a new background number should be generated. Moreover, the background value is an upper prediction limit, any concentration above which is considered to be higher than background. Any conclusion that a site UCL greater than the UPL is not higher than background is contrary to the agreement negotiated between our respective agencies and indicates that the groundwater manganese background concentration should actually be much lower, per EPA's previous comments based on additional sampling. Therefore, manganese should be designated as a compound of concern and included in the natural attenuation with monitoring (see also LC18). Manganese should be monitored and addressed for all potential remedies, including natural attenuation.*

Response: As mentioned in the previous response to this comment, the text will be revised to include manganese as a COC and also include manganese in the monitoring program.

Comment LC22: *EPA agrees to consider LUCs if the additional investigation of the TCE plume shows a potential risk from vapor intrusion. Please note that the risk calculations may need to be revised if toxicity values for TCE are changed.*

Response: A potential risk from vapor intrusion has not been identified at this site. Note that LUCs restricting use of groundwater are included in the alternatives evaluated in the FS. Vapor intrusion risk will be re-evaluated if toxicity values change. Such re-evaluation would take place during the five-year reviews.

ATTACHMENT A

Comment SC4: *Rather than continuing to debate the issue, EPA plans to install transducers in key wells to*

establish site-specific water level trends over the long term to assist in our evaluation of the groundwater data.

Response: Comment acknowledged. Please inform Navy when EPA intends to install the transducers.

Comment SC6: *While EBS and RI actions have addressed fuel contamination, residual amounts could be responsible for detections of naphthalene and related compounds. Additionally, residual fuel could create a reduced geochemical environment capable of exacerbating levels of dissolved manganese and other redox-sensitive metals. Future groundwater monitoring should consider these issues in light of maintaining or adding necessary control points. As stated in EPA's original comment, the shallow groundwater and zone of water-table fluctuation beneath the ditches should be included for future monitoring because previous removals may not have addressed contamination below the water table.*

Response: Groundwater monitoring is part of all of the alternatives. The groundwater sampling locations will be selected based on locations where COC concentrations are greater than PRGs and with input from the regulators.

Comment SC10: *EPA agrees that the potential for DNAPL at Building 15 appears unlikely. However, as discussed in LC9, a closer examination of contaminant distribution combined with an evaluation of groundwater flow over the greater area is needed. This could involve additional monitoring near Building 15, including bedrock monitoring.*

Response: The revised FS considers the larger extent of the plume. As noted above, groundwater monitoring is part of all the alternatives and additional monitoring wells would be installed as appropriate. As noted in the RI Addendum, the horizontal extent of the plume has been delineated.

Comment SC11: *A comprehensive examination of groundwater in the Building 15 area and adjacent areas of Buildings 81 and 82 needs to consider the engineered drainage systems (see also LC9).*

Response: The TCE contamination in the Building 15 area was evaluated in the RI Addendum. Although the location and extent of the TCE plume suggests that the source of the TCE contamination is one of the sewer systems, Navy believes that no further evaluation of the sewer systems is needed. The observed concentrations of TCE are very low and an evaluation of contamination in or in the immediate vicinity of the sewers (to determine an exact source) does not appear to be warranted.

Comment SC12: *The CSM needs to provide the technical basis to differentiate between metals resulting from site-activities (e.g., residual fuel spills) versus natural causes (e.g., reducing environment from peat deposits) so that remedial alternatives may be developed to address site-related metals issues. For example, a more robust understanding of metals occurrences and levels in shallow and deep overburden should consider ORP environment as well as proximity of specific monitoring wells to former releases of organic chemicals as well natural organic materials (e.g., peat).*

Response: The runways were constructed by filling in an extensive wetland. Organic material associated with these wetlands would serve as a carbon source. After dissolved oxygen was consumed, the carbon would promote anaerobic conditions. With this initial condition, it appears unlikely that effects of naturally occurring carbon can be distinguished from the effects from manmade sources. The RI is complete and no further investigations are planned. The CERCLA process is moving forward to complete the FS and select a site remedy. Note that groundwater monitoring included in all the alternatives evaluated in the FS will likely include installation of new monitoring wells, manganese has been added to analyte list, and ORP measurements will be recorded during sampling.

Comment SC14: *EPA appreciates the Navy's plans to evaluate the geology in the southeastern portion of the site in greater detail following the delineation of the Building 15 TCE plume. The May 17, 2010 memorandum presents the results from direct-push vertical profiling, and shallow and deep overburden plumes are delineated on that basis. The new plumes appear to discharge near the southern boundary of Building 82 near Building 120. Please present a hydrogeologic cross-section for a plane perpendicular to the southern of the site. For example, a WSW to ESE alignment from AVG-MW-4 toMW09-011 to B82-*

MW202S/D to B82-GP-I07 to B82-GP-J07 to 9AB-MW-05 would represent the configuration of the aquifer materials at the leading edge of the plume at the downgradient edge of the site. Presentation of this cross section should include representation of pertinent engineered features such as subsurface drains or catch basins, since such features could influence the Building 82 and new Building 15 plumes. A cross section could help identify data gaps that can be addressed later.

Response: The wells in the proposed EPA alignment would provide minimal additional information, as most of them are shallow borings with few stratigraphic details. Additional monitoring wells will likely be installed as part of the groundwater monitoring component of the selected remedy for Building 82. If appropriate, a cross-section of those wells could be developed during the remedial phase of work at the site.

Comment SC15: *EPA agrees that the GTM-2 area should be monitored after the structure and associated piping are removed. Post-excavation monitoring should include both inorganics and organics as analytes. EPA recommends that this effort also include collection of TOC (or other measures of organic carbon) following the excavation in order to test the assumption that, "…natural organic material may have been present in sufficient quantities to create reducing conditions, but not necessarily massive enough to create a defined layer…." Post excavation soil sampling (via test pit or borings) could be used to collect samples for supporting analysis. The analytical methods that are selected must be able to discriminate between natural (e.g., peat) and anthropogenic sources of carbon.*

Response: While confirmatory samples will be collected as part of the maintenance action [see April 8, 2010 BCT meeting notes and Work Plan for Piping and Soil/Sediment Removal Activities], no post-excavation monitoring activities are planned. Long-term monitoring of manganese in this area will be included in the FS alternatives. No further evaluation of TOC is proposed.

Comment SC16: *Notification of the conditions at TP-100C should still be made to any future developers of this site so that removal may be considered.*

Response: This information would be available though the administrative file for the site.

Comment SC17 (p. 2-2, §2.2.2): *Please refer to the earlier discussion on LC10 regarding the calculation of risk from multiple contaminants.*

Regarding MTBE, some evidence is necessary that an off-site source is responsible for the MTBE. Since neither a potential off-site source has not been identified nor has credible evidence been provided for an off-site source, then MTBE should not be eliminated as a site COC. Long-term monitoring for MTBE is needed to ensure that it does not migrate from off-site sources onto the site.

Response: MTBE was not determined to be a COC. However, MTBE is included in the groundwater monitoring component of the FS alternatives.

Comment SC18: *EPA recommended development of a CSM that reflects a more detailed assessment of manganese and other redox-sensitive metals. Evaluation of all remedial alternatives, including MNA, should be informed by the updated CSM (see also SC12).*

Response: Please see the Response to Comment SC12. Navy does not plan any further assessments of manganese or changes to the CSM at this point in the CERCLA process.

Comment SC21 (p. 2-4, §2.3.1): Please refer to the additional comment on LC10.

Response: Please see the Response to Comment LC10 above.

Comment SC22 (p. 2-10): *As EPA originally indicated, there is too much uncertainty to rely on risk calculations. The current risk calculations for vapor intrusion are not acceptable based on current site characterization data and potential future site use. After the additional characterization data are available and after a conservative assessment of the vapor intrusion risk is completed and accepted, then the need for LUCs can be properly assessed.*

Response: The concentrations of VOCs in shallow groundwater samples collected during the supplemental RI and presented in the RI Addendum were not significantly greater than the previous results. Thus, as discussed in the RI, vapor intrusion does not pose a significant risk at the site. Please see the Response to Comment LC22.

Comment SC23 (p. 2-11, §2.5.1): *The results of the supplemental investigations should guide whether pump and treat is analyzed in detail. If the contaminant concentrations are significantly greater than those detected previously then pump and treat should be reconsidered as a viable alternative. Unless the costs for pump and treat are clearly an order of magnitude greater than other alternatives considered, or a compelling case can be made against pump and treat in the screening process, pump and treat should be carried through to the detailed analyses. The rationale provided in the response is not compelling.*

Response: The maximum TCE concentration detected in groundwater samples collected during the supplemental RI was 25 µg/L. This concentration is not significantly greater than the previous maximum concentration of 8.5 µg/L. Pump and treat has been added to the technology screening portion of the FS. However, this technology is screened out, and as described in previous responses, a pump and treat alternative will not be developed for this site.

Comment SC30: *Please refer to the additional comment on SC23.*

Response: Please see the Response to Comment SC23.

Comment SC40 (p. 4-20, §4.2.4.2): *The proposed maintenance actions will not address potential migration via the 5-inch sanitary sewer and bedding that discharges to the south of Building 82 that could be responsible for contamination in that area (see also SC14). Additional monitoring points may be needed to evaluate surface or buried utilities and their potential for offsite transport of contaminants.*

Response: Based on the path of this pipeline relative to the location of the TCE plume (the pipeline is downgradient of the plume), it is unlikely that the pipeline contributes contamination to the groundwater. The TCE plume was delineated during the RI Addendum investigation. As mentioned above, additional monitoring wells would likely be installed as part of the selected remedy.

Comment SC45 (p. 5-1, §5.1.2): *Please refer to the additional comment on LC4.*

Response: Please see the Response to Comment LC4.

Comment SC58 (Appendix C, G-4) c): *EPA will consider this alternative when the database becomes robust enough to conclude that this alternative can successfully meet the RAOs within a reasonable timeframe.*

Response: Comment acknowledged. However, the model still provides useful information at this stage for the evaluation of natural attenuation. The FS includes natural attenuation as a component of the alternatives.

Comment SC59 (Appendix D) e): *The Navy must be able to demonstrate with available data that Natural Attenuation with Monitoring can be protective of human health and the environment. Any modeling used to support this alternative must be based on sufficient data to make the modeling credible.*

Response: Per the responses to SC58c above, natural attenuation is evaluated as a component of each alternative. Each alternative also includes a LUC component that would limit exposure to contaminated groundwater and would provide protectiveness of human health and the environment.

RESPONSE TO LETTER COMMENT 10
BUILDING 82 FS, NAS SOUTH WEYMOUTH
GROUNDWATER RSLs, MCLs, and RISK LEVELS

	RSLs										
Compound	10^{-6}	HI=1	MCL	MCL Risk, ILCR	MCL Risk, HI	Typical DL	DL risk, ILCR	DL risk, HI	Typical 1/2 DL	Typical 1/2 DL ILCR risk	Typical 1/2 DL HI risk
TCE	2	NA	5	2.5E-06	NA	0.5	2.5E-07	NA	0.25	1.3E-07	NA
cis-1,2-DCE	NA	370	70	NA	0.19	0.5	NA	0.001	0.25	NA	0.0007
Vinyl chloride	0.016	72	2	1.3E-04	0.03	0.5	3.1E-05	0.007	0.25	1.6E-05	0.003
1,1,1-TCA	NA	9,100	200	NA	0.02	0.5	NA	0.0001	0.25	NA	0.00003
1,1-DCA	2.4	7,300	NA	NA	NA	0.5	2.1E-07	0.0001	0.25	1.0E-07	0.00003
chloroethane	NA	21,000	NA	NA	NA	0.5	NA	0.00002	0.25	NA	0.00001
n-nitroso-di-n-propylamine	0.0096	NA	NA	NA	NA	0.5	5.2E-05	NA	0.25	2.6E-05	NA
Aroclor-1248	0.034	NA	0.5	1.5E-05	NA	0.5	1.5E-05	NA	0.25	7.4E-06	NA
Total				1.4E-04	0.2		9.8E-05	0.008		4.9E-05	0.004

RSLs from EPA website, July 2010.
All concentrations are in ug/L.

NAVY RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION (MASSDEP) COMMENTS (DATED MAY 14, 2010) ON NAVY RESPONSES TO COMMENTS, DRAFT FEASIBILITY STUDY, BUILDING 82 NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS

Navy responses to the MassDEP comments on the Navy's May 11, 2010 Responses to Comments (RTCs) on the Draft Feasibility Study for Building 82 are presented below. The MassDEP's comments are presented first (in italics) followed by Navy's responses.

Comment 1: *Responses to MassDEP comments on the FS are acceptable.*

Response: Comment noted.

Comment 2: *Please note that the revised ARAR tables that were enclosed with the responses to comments did not include the changes agreed to in the Navy's initial responses to MassDEP Comments 6 and 8: Please include these revisions in the revised FS document.*

Response: The ARARs tables have been revised to include 314 CMR 4.0 (per Comment 6) and 310 CMR 40.0040 (per Comment 8). However the response to the other portion of Comment 6 was incorrect; the MCP is not considered an ARAR at CERCLA sites. Therefore, 310 CMR 40.0993(6) (per Comment 6) has not been included.