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U S NAVY RESPONSE TO REGULATOR COMMENTS TO DRAFT SAMPLING AND
ANALYSIS PLAN INDUSTRIAL OPERATIONS AREA WITH TRANSMITTAL NAS SOUTH
WEYMOUTH MA
4/11/2011
TETRA TECH



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April 11, 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 Sampling and Analysis Plan
Industrial Operation Area
Naval Air Station South Weymouth, Weymouth, Massachusetts

Dear Mr. Helland:

Enclosed are responses to comments (RTCs) received from the Massachusetts Department of Environmental Protection (MassDEP) on the Draft Sampling and Analysis Plan, Industrial Operations Area, former Naval Air Station South Weymouth, Weymouth, Massachusetts. The draft Sampling and Analysis Plan (SAP) was submitted on December 16, 2010. Once concurrence is obtained on these responses and on responses to any comments received from the U.S. Environmental Protection Agency (EPA), the SAP will be finalized and the field program will be implemented. As you have mentioned, the Navy must complete the field program in a timely manner to support property transfer and redevelopment schedules.

At your request and on behalf of the Navy, the MassDEP RTCs on the draft SAP, Industrial Operations Area, are being provided to the recipients listed below. 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)
Chief Executive Officer, South Shore Tri-town Development Corp. (w/encl. – 1)
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File G02073-3.2 (w/o encl.); G02073-8.0 (w/encl.)

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**NAVY RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION
(MASSDEP) COMMENTS (DATED JANUARY 6, 2011)
SAMPLING AND ANALYSIS PLAN
INDUSTRIAL OPERATIONS AREA
NAVAL AIR STATION SOUTH WEYMOUTH, WEYMOUTH, MASSACHUSETTS**

Navy's responses to the MassDEP comments on the Sampling and Analysis Plan, Industrial Operations Area, Naval Air Station South Weymouth, Weymouth, Massachusetts (December 2010) are presented below. The MassDEP comments are presented first (in italics) followed by Navy's responses.

1. Section 11.3: Assuming the prevailing wind direction is toward the northeast, the proposed sampling of dioxin in the area downwind of Building 8, a significant potential source of dioxins, is sparse. To improve downwind sample coverage, MassDEP recommends that dioxin samples also be collected from EU-9 and EU-15. Similarly, Figure 5 indicates that coverage is sparse in the area where and coal and coal ash, a probable dioxin source, were encountered during previous investigations. To improve sample coverage in this area, samples should be collected from EU-37 and EU-38 for dioxin analysis.

Response: Based on the consensus reached during previous discussions, EU's with exposed surface areas were targeted for dioxin sampling. The Navy does not believe that EU-9 or EU-15 has exposed surface soil, but these EU's will be checked prior to commencing the field program. If either EU has exposed surface soil, the sampling plan will be modified to target these areas for dioxin sampling. Also since the EU-15 area may have been soil covered during WWII when the primary coal firing in the steam plant occurred, a subsurface soil sample will be collected from EU-15 for dioxin analysis. EU-37 and EU-38 were targeted for subsurface dioxin samples (since the coal ash layer in this area was noted at depth); however, the sampling plan will be revised to include EU-37 (instead of EU-43) for both surface and subsurface soil dioxin sampling.

2. Table 11-1: The information provided in the third column should be consistent with Figure 5 (e.g., Figure 5 indicates that the sample collected from EU-7 will be analyzed for PAHs, PCBs, metals, and dioxins, while Table 11-1 indicates the sample will be analyzed for PAHs, metals, and dioxins).

Response: Figure 5 will be revised to be consistent with Table 11-1.

3. Section 11.3: The sampling approach proposed for subsurface soil in RIA 33 and RIA 82 is inconsistent with project objectives and discussions. Rather than collecting samples to characterize exposure units where dispersed, non-point-source contamination will be investigated, as planned for surface soil in the Industrial Operations Area, a targeted, site-specific sampling and analysis approach should be proposed to delineate the extent of subsurface soil contamination associated with the point-sources of concern in RIA 33 and RIA 82. The Building 117 floor drain system is the source of VOCs and PAHs contamination in RIA 33. The Building 8 fuel storage tank area is the suspected source of PAHs contamination in RIA 82.

Response: The sampling approach in this section will be revised to reflect site-specific sampling associated with RIA 33 (Building 117) and RIA 82 (adjacent to Building 8). Note however, that the EU numbering system will not be changed. The locations of the existing subsurface samples from Building 117 (Figure 6 of the SAP) were compared to the Building 117 floor drain system. Based on this review, the sampling approach for subsurface soil in RIA 33 will be modified to target five locations associated with the floor drain system in Building 117 (mainly in the southern portion of the building). The samples will be collected at a depth below the floor drain system but above the water table. The approach for RIA 82 will be modified to include two locations downgradient of the Building 8 fuel storage tank area with samples collected at a depth below the bottom of the tank but above the water table. The samples will be analyzed for PAHs, PCBs, metals, and dioxins. In addition, samples associated with RIA 33 will be analyzed for VOCs. Worksheet #11, Table 11-2, and other portions of the SAP will be revised where necessary.

4. *Section 11.4: The plan should be clarified to indicate how the results from previously collected surface soil samples will be integrated with new sample results for evaluation (e.g., using the maximum concentrations of previously detected compounds to represent conditions in each EU).*

Response: Section 11.4 will be revised to clarify that if an EU has previously been sampled for the required compounds, the maximum concentrations of previously detected compounds will be used to represent current conditions and will be screened against the PSLs.

5. *Figure 2: Unless previously evaluated, the structure located immediately east of the Building 81 fence should be included in the Industrial Operations Area assessment. Assuming the nearby wash-rack was evaluated previously, this can be accomplished without adding an additional EU by extending EU-1 westward to include the structure.*

Response: EU-1 will be extended westward to include the structure located immediately to the east of the Building 81 fence.

6. *Figures 3 and 4 should be clarified to indicate the units associated with the values listed in the tags (e.g., text in legend indicating the values are ratios or concentrations in mg/kg).*

Response: The values listed are ratios and therefore do not need units.

7. *Figure 5: To avoid sampling in areas that were backfilled with clean fill during previous actions, the figure should identify the removal areas (refer to Figure 2), and the areas designated “Excluded from Sampling – ROD in place” should be corrected or deleted.*

Response: Figure 5 will be revised to identify areas (per Figure 2, Approximate Excavation Area) where removal actions have been completed to avoid sampling in areas backfilled with clean fill during previous actions. The legend and areas on Figure 5 noted as “Excluded from Sampling – ROD in place” will be removed from the figure.