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U S NAVY RESPONSE TO REGULATOR COMMENTS TO DRAFT FINAL DECISION  
DOCUMENT PHASE II ENVIRONMENTAL BASELINE SURVEY REVIEW ITEM AREA 11  
WITH TRANSMITTAL NAS SOUTH WEYMOUTH MA  
8/20/2012  
TETRA TECH



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C-NAVY-08-12-5109W

August 20, 2012

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 and Draft Final Decision Document, Phase II Environmental  
Baseline Survey  
Review Item Area 11 – Releases of Aqueous Film Forming Foam in Hangar 1  
Former Naval Air Station South Weymouth, Weymouth, Massachusetts

Dear Mr. Helland:

Tetra Tech, Inc. has prepared responses to comments (RTCs) received from the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MassDEP) on the Draft Decision Document for Review Item Area 11, Former Naval Air Station South Weymouth, Weymouth, Massachusetts. The document has been revised in accordance with the RTCs. The Draft Final Decision Document is enclosed. Comments on the document are requested in 30 days.

On behalf of the Navy, the RTCs and Draft Final Decision Document for Review Item Area 11, are being provided to the recipients listed below. If you have any questions regarding the documents, 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 paper, 1 CD)  
C. Keating, EPA (w/encl. – 3 paper, 1 CD)  
D. Chaffin, MassDEP (w/encl. – 1 paper, 1 CD)  
P. Steinberg, Mabbett & Associates, Inc.  
(w/encl. – 1 paper, 1 CD)  
P. Sortin, Abington (w/encl. – 1 CD)  
M. Brennan, 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, 4 CD)  
R. Daniels, LNR Property Corp. (w/encl. – 1 CD)  
J. Traut, Tetra Tech (w/encl. – 1 paper)  
J. Trepanowski, Tetra Tech (w/o encl.)  
G. Glenn, Tetra Tech (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 AUGUST 7, 2012) ON  
REVIEW ITEM AREA 11 – RELEASES OF AQUEOUS FILM FORMING FOAM IN HANGAR 1,  
DECISION DOCUMENT  
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

Navy's responses to the EPA comments on the Review Item Area 11 Decision Document are presented below. The EPA comments are presented first (in italics) followed by Navy's responses.

***Comment 1. Page 9, §2.1.2** - The discussion of sediment and surface water sampling refers to three sediment samples plus one duplicate; however, Figure 3, which shows the 2011 sample locations, presents four 2011 surface water and sediment sample locations (SW/SED-1 through 4). Please correct as appropriate to reconcile the text with Figure 3.*

**Response:** Figure 3 has been revised to indicate the 2012 surface water/sediment location (SW/SED-4) separately from the three 2011 surface water/sediment locations to match the text. The text has been clarified to note the specific samples collected in 2011 and 2012.

***Comment 2. Page 9, §2.1.2** - Similarly, the text refers to four surface water sampling locations plus one duplicate, which includes location SW-51D2; however, Figure 3 shows four surface water sampling locations (SW-1 through 4) but does not show location SW-51D2. Please correct as appropriate to reconcile the text with Figure 3.*

**Response:** Figure 3 has been revised to present SW-51D2 as a 2011 surface water location and SW-4 as a 2012 location as noted in the Response to Comment 1 above.

***Comment 3. Page 9, §2.1.3** - The first paragraph in this section states that Figures 5 and 6 show sample locations for RIA 11 and Hangar 1; however, these two figures only present water elevation monitoring locations. Please correct as appropriate to reconcile the text with Figures 5 and 6.*

**Response:** The text has been revised to reference Figures 3 and 4 instead of Figures 5 and 6.

***Comment 4. Page 9, §2.1.3** - The first paragraph also states that one additional sediment and surface water sample was collected in 2012; however, there is no figure depicting the location for that sample (or any of the 2012 sample locations) so it is not apparent what locations were sampled in 2012. Please provide a figure depicting the 2012 sample locations.*

**Response:** Please see the Response to Comment 1. Figure 3 does include the 2012 surface water/sediment location (SW/SED-4).

***Comment 5. Page 12, §4.1** - Please revise the last two full sentences on this page for clarity (they appear to be contradictory). If only PHA values (and not NMCPHC values) were used to screen groundwater, please state that clearly and provide the rationale for that (e.g., insufficient risk data is available to calculate reliable NMCPHC values for groundwater exposure).*

**Response:** The last two sentences have been revised as follows: "The PHA values were used as a screening level for groundwater because they represent the most conservative exposure scenario, e.g. ingestion of groundwater as drinking water. The screening level values used for soil, sediment, and surface water are the most conservative (lowest) values reported for the exposure scenarios calculated by the NMCPHC as provided in Appendix A-1."

***Comment 6. Page 17, §5.0** - Regarding the last sentence on this page, please clarify that the ESD will also impose monitoring and five year review requirements to ensure protectiveness.*

**Response:** The final sentence on page 17 and the referenced Figure 14 have been deleted. Details concerning the FFTA ESD, including a groundwater use prohibition, monitoring, and five year review requirements, will be discussed with the BRAC cleanup team and addressed as part of the ESD.

**Comment 7. Figure 3 -** *Please add sample location SW-51D2 to this figure.*

**Response:** As noted in the Response to Comment 2, sample location SW-51D2 has been added to Figure 3.

**Comment 8. Figure 9 -** *Please review and correct, as appropriate, the red line symbol in this figure which identifies the extent of PFOA/PFOS exceedances. This appears to contradict the orange line symbol which identifies the extent of PFOS. The colored well symbols are correct but the colored line symbols are not.*

**Response:** The legend has been updated so the red line symbol identifies the estimated extent of both PFOA and PFOS exceedances and the orange line symbol identifies the estimated extent of PFOS only exceedances.

**Comment 9. Appendix A-1 -** *Please include the equations used to calculate risk screening values.*

**Response:** The equations used by the Navy to calculate risk screening values have been included in this document. Please note that at the request of R. Sugatt, the Navy had provided equations to R. Sugatt via email dated February 14, 2012.

**NAVY RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION  
(MASSDEP) COMMENTS (DATED JULY 27, 2012) ON  
REVIEW ITEM AREA 11 – RELEASES OF AQUEOUS FILM FORMING FOAM IN HANGAR 1,  
DECISION DOCUMENT  
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

Navy's responses to the MassDEP comments on the Review Item Area 11 Decision Document are presented below. The MassDEP comments are presented first (in italics) followed by Navy's responses.

**Comment 1:** *Section 4.1: "Groundwater used for irrigation" should be not be associated with "Construction Worker" in the imbedded table. Appendix A-1 indicates this risk scenario concerns residents (e.g., golfers) and at-grade maintenance workers (e.g., lawn care).*

**Response:** "Groundwater used for irrigation" has been removed from the "Construction Worker" scenario and added to the "Maintenance Worker" scenario in the imbedded table on page 12.

**Comment 2:** *Section 4.1.2: The imbedded table should indicate that the maximum concentration of PFOA reported in the Hangar 1 groundwater samples was 15 ug/L (Table 6).*

**Response:** The imbedded table in Section 4.1.2 has been revised as noted in the comment. In addition, a note has been added to the entries for FFTA-MW13 to indicate that the maximum concentrations for PFOA and PFOS shown in the table are the averages of the FFTA-MW13 sample and duplicate results.

**Comment 3:** *Section 5.0: MassDEP agrees that further action under CERCLA is warranted to address PFCs in groundwater in the vicinity of Hangar 1 and FFTA (Figures 9 and 10). While specific actions remain to be determined, it is now apparent that in addition to land use controls, a groundwater monitoring component will be necessary to ensure protectiveness.*

**Response:** Comment noted. Further CERCLA actions at Hangar 1 and FFTA including groundwater monitoring will be discussed with the BRAC cleanup team.

**Comment 4:** *Appendix A-1: Equations used to calculate screening values should be included so screening values can be confirmed.*

**Response:** The equations used to calculate screening values in Appendix A-1 have been included in the appendix.

**Comment 5:** *Appendix C: Please submit lab reports for the December 2011 soil samples and the February 2012 soil, surface water, and sediment samples.*

**Response:** Laboratory reports for the December 2011 soil samples and the February 2012 soil, surface water, and sediment samples are provided on a separate CD to MassDEP.