N00101.AR.002790
NAS SOUTH WEYMOUTH
5090.3a

U S NAVY RESPONSE TO REGULATOR COMMENTS TO REVISED DRAFT FEASIBILITY STUDY REPORT ARARS TABLES SOLVENT RELEASE AREA WITH TRANSMITTAL NAS SOUTH WEYMOUTH MA
7/11/2012
TETRA TECH

TETRA TECH

PITT-07-12-010

July 11, 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 on Revised Draft Feasibility Study Report ARARs Tables
Draft Final Feasibility Study Report
Solvent Release Area
Former Naval Air Station South Weymouth, Weymouth, Massachusetts

Dear Mr. Helland:

Tetra Tech, Inc. has prepared a Draft Final Feasibility Study (FS) Report for the Solvent Release Area, Former Naval Air Station South Weymouth, Weymouth, Massachusetts. The document has been revised to incorporate the Navy's May 8, 2012 and May 22, 2012 Responses to Comments (RTCs) received on the Revised Draft FS from the regulators and other stakeholders, as well as the enclosed Navy RTCs to EPA's June 11, 2012 comments on the Revised Draft FS ARARs tables. Please note that the permanent land use control boundary has been adjusted to fully encompass the groundwater impacted by the SRA Site.

On behalf of the Navy, the referenced RTCs and Draft Final FS for the Solvent Release Area are being provided to the recipients listed below. Comments on the document are requested in 30 days. If you have any questions regarding the documents, please contact me at (978) 474-8403.

Very truly yours,

For

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. Logan, 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.);
G02073-8.11 (w/encl. – 1 each)

Tetra Tech
661 Andersen Drive, Pittsburgh, PA 15220-2700
Tel 412.921.7090 Fax 412.921.4040 www.tetratech.com

G. Wagner

NAVY RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
COMMENTS DATED JUNE 11, 2012
REVISED DRAFT FEASIBILITY STUDY – SOLVENT RELEASE AREA
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS

The Navy's responses to the EPA comments on the Solvent Release Area Revised Draft Feasibility Study (dated February 2012) ARARs tables are presented below. The EPA comments are presented first (in italics) followed by Navy's responses.

Comment 1, Table 2-1 *– Please add the following since there are exposure pathways other than ingestion of water through drinking (i.e., inhalation) and since various metals were detected above HAs.*

Health Advisories	*EPA Office of Drinking Water, EPA-822-R-04-003, January, 2004*	*TBC*	*Health Advisories are estimates of risk due to consumption of contaminated drinking water; they consider non-carcinogenic effects only. To be considered for contaminants in groundwater that may be used for drinking water where the standard is more conservative than either federal or state statutory or regulatory standards. The health Advisory standard for manganese is 0.3 mg/l.*	*The No-Action alternative will not achieve these standards developed through the use of this guidance since non-carcinogenic risk resulting from exposure to compounds identified in the Health Advisory (e.g. manganese) will not be addressed.*

Response: The Health Advisories have been added as TBCs. The suggested wording has been slightly modified since health advisories are non-enforceable guidelines. Please see the revised version of Table 2-1.

Comment 2, Table 4-2 *– Please add the following to the list of Federal ARARs:*

Health Advisories	*EPA Office of Drinking Water, EPA-822-R-04-003, January, 2004*	*TBC*	*Health Advisories are estimates of risk due to consumption of contaminated drinking water; they consider non-carcinogenic effects only. To be considered for contaminants in groundwater that may be used for drinking water where the standard is more conservative than either federal or state statutory or regulatory standards. The health Advisory standard for manganese is 0.3 mg/l.*	*This alternative will achieve the standards developed through the use of this guidance since non-carcinogenic risk resulting from exposure to compounds identified in the Health Advisory (e.g. manganese) will be addressed.*

Response: The Health Advisories have been added as TBCs. The suggested wording has been slightly modified since health advisories are non-enforceable guidelines. Please see the revised version of Table 4-2.

Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites	*OSWER Directive 9200.4-17P (April 21, 1999)*	*TBC*	*EPA guidance regarding the use of monitored natural attenuation for the cleanup of contaminated soil and groundwater. In particular, a reasonable time frame for achieving cleanup standard through monitored attenuation would be comparable to that which could be achieved through active restoration.*	*This monitored natural attenuation alternative will only meet these standards if natural attenuation will attain all groundwater cleanup standards within a reasonable time frame. It is estimated that all cleanup standards will be achieved in 15 years.*

Response: Disagree. MNA is not a component of any of the alternatives as it was eliminated in the Section 3 screening evaluation. Natural attenuation is not being used to achieve the PRGs in Alternative G-2. As described in Component 1 of Alternative G-2, monitoring would include groundwater wells north and south of the EMD as well as surface water and sediment monitoring in the EMD.

Comment 3, Table 4-5 *– Please add the following to the list of Federal ARARs:*

Health Advisories	*EPA Office of Drinking Water, EPA-822-R-04-003, January, 2004*	*TBC*	*Health Advisories are estimates of risk due to consumption of contaminated drinking water; they consider non-carcinogenic effects only. To be considered for contaminants in groundwater that may be used for drinking water where the standard is more conservative than either federal or state statutory or regulatory standards. The health Advisory standard for manganese is 0.3 mg/l.*	*This alternative will achieve the standards developed through the use of this guidance since non-carcinogenic risk resulting from exposure to compounds identified in the Health Advisory (e.g. manganese) will be addressed.*

Response: The Health Advisories have been added as TBCs. The suggested wording has been slightly modified since health advisories are non-enforceable guidelines. Please see the revised version of Table 4-5.

Comment 4, Tables 4-7, 4-10, and 4-13 *- The Navy eliminated all federal action-specific ARARs. That is not correct. Since RCRA is a delegated program in MA, for those RCRA standards that have state corollaries, it is sufficient to include only the state references [Hazardous Waste Rules for Identification and Listing of Hazardous Wastes, Hazardous Waste Management Rules -- Requirements for Generators, and Management Procedures for Remedial Wastewater and Remedial Additives]. But the Navy needs to include Subpart Q as a federal action-specific ARAR:*

RCRA Interim Status TSDF Standards – Chemical, Physical, and Biological Treatment	*40 CFR 265 Subpart Q*	*Relevant and Appropriate*	*The regulations in this subpart apply to the treatment of hazardous wastes by chemical, physical, or biological methods in other than tanks, surface impoundments, and land treatment facilities. Treatment reagents must not be placed in the treatment process or equipment if they could cause the treatment process or equipment to rupture, leak, corrode, or otherwise fail before the end of its intended life. Inspections are required to make sure treatment process is operating correctly.*	*In-situ treatment using bioremediation will be conducted in compliance with these standards regarding the handling and management of treatment chemicals.*

Response: The suggested RCRA ARAR is not pertinent as this regulation applies to ex-situ treatment. This alternative is an in-situ process. There is no process equipment that this regulation can be applied to. In addition, safe handling of reagents is addressed by OSHA regulations. The suggested change will not be made.

Underground Injection Control (UIC)	*40 CFR 144,146, and 147.1100*	*Applicable*	*These regulations address the discharge of wastes, chemicals or other substances into the subsurface. The federal UIC program designates injection wells incidental to aquifer remediation and experimental technologies as Class V wells authorized by rule that do not require a separate UIC permit.*	*These standards regulate the injection of biological or chemical substance into the groundwater. In-situ treatment using bioremediation will be conducted in compliance with these standards.*

Response: Disagree. Since the federal UIC program has been delegated to the Commonwealth of Massachusetts, the state UIC program is included but the federal UIC ARAR referenced above is not required. The suggested change will not be made.

CAA National Emission Standards for Hazardous Air Pollutants (NESHAPs)	*42 U.S.C § 7412 40 CFR Parts 61 and 63*	*Applicable*	*The regulations establish emission standards for 189 hazardous air pollutants. Standards are set for fugitive dust and other release sources.*	*If remedial activities generate regulated air pollutants, then measures will be implemented to meet the standards.*

Response: The suggested ARAR has been added. Please see the revised versions of Tables 4-7, 4-10 and 4-13.

Clean Water Act Section 402 -- National Pollution	*40 CFR 122-125, 131, 136*	*Applicable*	*Includes discharge limitations, monitoring requirements, and best management practices. Substantive requirements under NPDES are*	*The standards apply to the digging of the trench and any dewatering of wetlands.*

Discharge Elimination System (NPDES)			*written such that state and federal ambient water quality criteria (AWQC) are met.*	

Response: Disagree. No regulated discharge to surface water is anticipated for the alternatives. The anticipated PRB construction technique would not require dewatering and excavated soil from the trenches would be allowed to drain back into the trench.

Comment 5, Tables 4-8 and 4-11 – *Please add the following to the list of Federal ARARs:*

Health Advisories	*EPA Office of Drinking Water, EPA-822-R-04-003, January, 2004*	*TBC*	*Health Advisories are estimates of risk due to consumption of contaminated drinking water; they consider non-carcinogenic effects only. To be considered for contaminants in groundwater that may be used for drinking water where the standard is more conservative than either federal or state statutory or regulatory standards. The health Advisory standard for manganese is 0.3 mg/l.*	*This alternative will achieve the standards developed through the use of this guidance since non-carcinogenic risk resulting from exposure to compounds identified in the Health Advisory (e.g. manganese) will be addressed.*

Response: The Health Advisories have been added as TBCs. The suggested wording has been slightly modified since health advisories are non-enforceable guidelines. Please see the revised versions of Tables 4-8 and 4-11.

Comment 6, Table 4-11 – *Please delete "Groundwater Classification" under list of State ARARs.*

Response: Agree. For consistency the change has also been made to all the chemical-specific ARARs tables. The Navy notes that for consistency with the RTCs on other portions of the FS, the MCP UCL ARAR has been replaced with the MCP GW-3 standards. Please see the revised versions of Tables 2-1, 4-2, 4-5, 4-8 and 4-11.

Comment 7, Table 4-12 – *Please insert "and Floodplains" after "Protection of Wetlands".*

Response: While the suggested change has been made the Navy notes that there are no delineated floodplains at the SRA Site. For consistency the change has been made to all the location-specific ARARs tables. Please see the revised versions of Tables 4-3, 4-6, 4-9 and 4-12.

Comment 8, Table 4-12 – *Please add, "This alternative is the least environmentally damaging practice/alternative. Adverse effects must be minimized (as well as mitigated)" to the end of the paragraph for the Clean Water Act, "Evaluation/Action to be Taken" discussion.*

Response: The text in the last column has been replaced with the following: "Remedial activities, such as source area treatment will involve fill material discharge to wetlands. If there is no practicable alternative to the discharge, any adverse impacts must be minimized and mitigated. A Least Environmentally Damaging Practicable Alternative determination to protect wetland resources and provide the best balance of addressing contaminated media within and adjacent to wetlands while minimizing both temporary and permanent alteration of wetlands and aquatic habitats on site will be made when the remedy is selected." Please see the revised version of Table 4-12.