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LETTER AND U S NAVY RESPONSE TO REGULATOR COMMENTS TO EXPLANATION OF
SIGNIFICANT DIFFERENCES FIRE FIGHTER TRAINING AREA NAS SOUTH WEYMOUTH

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C-NAVY-01-13-5186W

January 23, 2013

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, Explanation of Significant Differences
Fire Fighting Training Area
Former Naval Air Station South Weymouth, Weymouth, Massachusetts

Dear Mr. Helland:

Enclosed are responses to comments (RTCs) received from the U.S. Environmental Protection Agency (EPA) and Massachusetts Department of Environmental Protection (MassDEP) on the Navy's September 27, 2012 RTC package and the Draft Final Explanation of Significant Differences, Fire Fighting Training Area, Former Naval Air Station South Weymouth, Weymouth, Massachusetts. The Explanation of Significant Differences (ESD) has been revised in accordance with the RTCs. A 15-day public comment period for review of the ESD will run from February 4 – 22, 2013 as described on the enclosed notice. The public comment version of the document is enclosed. The notice and ESD will be mailed to the RAB and BCT members early next week and will be discussed at the February 14, 2013 RAB meeting.

On behalf of the Navy, the referenced RTCs and public comment version of the ESD for the Fire Fighting Training Area 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,

A handwritten signature in cursive script that reads 'Phoebe A. Call'.

Phoebe A. Call
Project Manager

PAC/lh

Enclosures

- c: D. Barney, Navy (w/encl. – 1)
- C. Keating, EPA (w/encl. – 3)
- D. Chaffin, MADEP (w/encl. – 1)
- Chief Executive Officer, South Shore Tri-town Development Corp. (w/encl. – 1)
- R. Daniels, LNR Property Corporation (w/encl. – 1)
- RDM, Tetra Tech (RTCs only)
- 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. – original)

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**NAVY RESPONSES TO U.S. ENVIRONMENTAL PROTECTION (EPA)
COMMENTS DATED OCTOBER 22, 2012
EXPLANATION OF SIGNIFICANT DIFFERENCES – FIRE FIGHTING TRAINING AREA
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

The Navy's responses to the EPA comments on the Navy's September 27, 2012 Responses to Comments, Explanation of Significant Differences, Fire Fighting Training Area are presented below. The EPA comments are presented first (in italics) followed by Navy's responses.

Comment 2, Page 7, Section 6.0 - Response is unacceptable. Please insert the following language: "Five-year reviews will be conducted by the Navy, in conjunction with EPA and MassDEP, until the groundwater conditions are restored such that the Site is suitable for unrestricted use and unlimited exposure in accordance with CERCLA. During such reviews, the Navy, EPA, and MassDEP will review site conditions and monitoring data to determine whether the continued implementation of the remedy is appropriate." In addition, the Navy must commit, at a minimum, to annual monitoring of groundwater, sediment, and surface water (from locations and compounds identified in a long-term monitoring plan), at least through the first, five-year review period (at which time the Navy can make a case for the discontinuation of future sampling based on data trends, if any, observed over the previous five years). Although the RIA 11 Decision Document recommended no further action for soil, sediment and surface water in the FFTA portion of RIA 11, sediment and surface water monitoring should be performed to confirm the continued absence of previously detected contaminants above risk screening levels (e.g., to eliminate concerns related to possible future impacts associated with the continued migration of PFC-contaminated groundwater from upgradient sources).

Response: The second paragraph in Section 6.0 has been revised as follows: "Five-year reviews will be conducted by the Navy, in conjunction with EPA and MassDEP, until the groundwater conditions are restored such that the Site is suitable for unrestricted use and unlimited exposure in accordance with CERCLA. During such reviews, the Navy, EPA, and MassDEP will review site conditions and monitoring data to determine whether the continued implementation of the remedy is appropriate. The presence of new groundwater extraction wells in the general vicinity of the FFTA will be determined as part of each five-year review."

The Navy agrees to perform annual groundwater monitoring for a five-year period at which time the Navy will review the data trends and make recommendations regarding a need for additional monitoring. In addition the Navy agrees to perform a single surface water and sediment sampling event to address the concerns stated in the EPA comment. The Navy will review the surface water and sediment analytical results and make recommendations regarding the need for any additional sampling. There are no promulgated federal standards established for PFCs in surface water and sediment. The available surface water and sediment analytical results compared to risk screening levels are presented in the RIA 11 Decision Document. The maximum surface water PFOA and PFOS concentrations in the vicinity of the FFTA are three orders of magnitude lower than the child recreator screening levels used in the RIA 11 Decision Document. The maximum sediment PFOA and PFOS concentrations are two orders of magnitude lower than the child recreator screening levels. The Navy notes that EPA reviewed the risk-based screening levels used in the RIA 11 Decision Document and stated "the Navy's proposed screening levels will be sufficiently protective, especially because the actual measured concentrations are much lower than the proposed screening levels and concentrations are likely to decrease even further over time because these chemicals are no longer being used at the site."

The Navy will prepare a long-term monitoring plan which will describe the collection of samples from groundwater monitoring wells and surface water and sediment locations in the vicinity of the FFTA for which prior data were presented in the RIA 11 Decision Document. The surface water/sediment data along with the available groundwater data will be evaluated in the next five year review which is due in July 2014.

The second sentence of the final paragraph of Section 4.2 has been deleted and replaced with the following: "The Navy will develop a long-term monitoring plan and implement an annual monitoring

program in accordance with the plan. The annual monitoring data will be evaluated as part of the five-year reviews described in Section 6.0 of the ESD.” Attachment 2 has also been deleted.

Comment 4, Figures 2 & 3 - The response is unacceptable. If contamination in excess of the provisional health advisories is detected at a proposed groundwater extraction well location (i.e., samples are usually collected during exploratory operations, prior to well installation), then the proposed well location should be moved to an alternate location. In addition, the current plume boundaries and "Groundwater Restriction Area" should be expanded to incorporate this new detection (e.g., new monitoring well location).

Response: Since the property surrounding the FFTA is zoned for open space (and not residential use), the hypothetical scenario of installation of a groundwater extraction well and use of groundwater exceeding the provisional health advisory (PHA) values for drinking water is not an issue. Recreational use of groundwater in this area is unlikely because this area is not in a potentially productive aquifer. The Navy does not believe the scenario expressed in the comment is reasonable. In addition, the actions proposed in the comment would impose too many unnecessary restrictions on property which has been transferred. The initial Navy response stands and the sentence added to Section 6.0 will remain in the ESD for the reasons noted below:

- Groundwater in the vicinity and downgradient of the FFTA is not a potentially productive aquifer as mapped by MassGIS.
- The SSTDTC Health Regulations for NAS South Weymouth, Article XIV – Well Regulations, prohibit potable wells and require that a permit be obtained prior to beginning construction of any private well. A private well is defined to “supply water intended for irrigation purposes and/or groundwater source heat pumps and not subject to regulation by 310 CMR 22.00.” Therefore the hypothetical scenario described in the EPA comment could not occur.
- The FFTA hold back parcel and the surrounding areas are zoned as open space (open space corporation [OS-C], open space Rockland [OS-R], and golf course/open space [GOSD]). No residential development is allowed in these zoning districts. Public recreation is allowed; a multi-use trail will be developed adjacent to both branches of French Stream.
- The property surrounding the FFTA was transferred to SSTDTC on December 15, 2011. Portions of FOST 4 and FOST 5A which constitute the FFTA hold back area were not transferred at that time. The suggestion that the current restriction area be expanded is therefore not possible as the Navy is not the property owner.
- The PFOA and PFOS concentrations in groundwater from the monitoring wells in the vicinity of the FFTA are all well below the Navy-calculated values for a construction worker (assumes exposure via incidental ingestion of groundwater) and a maintenance worker/resident (assumes exposure via incidental ingestion of groundwater used for irrigation). These values and exposure scenarios, not the PHA values, would be appropriate given EPA’s suggested scenario.
- There is no obligation to sample groundwater for PFCs outside of the identified extent around the FFTA. Nor is it reasonable to suggest that the Navy compel the current landowner or future land owners to do so.
- Attachment 1 to the ESD specifies the LUC implementation actions which the Navy will follow to inspect, report on, and enforce the institutional controls in the ESD. Item 4 specifically addresses the review of permits issued for groundwater wells on the transferred property and neighboring towns. This review will occur on an annual basis and will also be performed as part of each five year review, as noted in Section 6.0 of the ESD.

**NAVY RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION
(MASSDEP) COMMENTS DATED OCTOBER 24 & OCTOBER 25, 2012
EXPLANATION OF SIGNIFICANT DIFFERENCES – FIRE FIGHTING TRAINING AREA
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

The Navy's responses to the MassDEP comments on the Navy's September 27, 2012 Responses to Comments and October 2012 Draft Final Explanation of Significant Differences, Fire Fighting Training Area are presented below. The MassDEP comments are presented first (in italics) followed by Navy's responses.

Comment 1: *(Received via email on October 24, 2012 from D. Chaffin, MassDEP.) The responses to MassDEP's March 23, 2012 technical comments on the draft ESD for FFTA and the revisions implemented in the draft final document based on those responses are acceptable.*

Response: Acknowledged.

Comment 2: *(Received via email on October 25, 2012 from L. Rogers, MassDEP.) Given site characteristics at FFTA, MassDEP continues to prefer that a grant of environmental restriction imposing perpetual restrictions be established at FFTA pursuant to M.G.L. c. 21E, sec. 6, and not just 999 year deed restrictions (i.e., restrictions written into a deed), as proposed by the Navy.*

Response: The Navy notes MassDEP's preference for a Grant of Environmental Restriction and Easement (GERE). However, the Navy continues to believe that a GERE is not necessary for the FFTA site. In response to comments from the EPA, the Navy has agreed to perform a long-term monitoring program and will also perform five-year reviews as described in Section 6.0 of the draft final ESD.