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ANNOTATED RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL
PROTECTION COMMENTS ON ADDENDUM TO REMEDIAL ACTION WORK PLAN SEWAGE
TREATMENT PLAN NAS SOUTH WEYMOUTH MA

05/23/2014
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DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND, ATLANTIC
REMEDIAL ACTION CONTRACT (RAC)
CONTRACT NO. N62470-13-D-8007
CONTRACT TASK ORDER NO. WE02
NAVAL AIR STATION – SOUTH WEYMOUTH
SOUTH WEYMOUTH, MASSACHUSETTS

ANNOTATED RESPONSES TO REVIEW COMMENTS

The following are responses to Massachusetts Department of Environmental Protection (MassDEP) review comments on the Addendum to Remedial Action Work Plan for Sewage Treatment Plant Site, Naval Air Station South Weymouth, Massachusetts, dated May 9, 2014. MassDEP comments are provided in italic type followed by the Navy's and/or Tetra Tech EC, Inc.'s responses in bold type.

Reviewer: MassDEP Date: May 23, 2014

Comment 1: Section 2.3: The addendum should note that additional discrete areas of subsurface soil contamination (e.g., refer to MassDEP's February 26, 2014 comments on the 2014 soil delineation report for a list of release areas) and additional contaminants of concern in soil, including dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene, DDD, DDE, and PCBs, were identified during the investigations conducted after 2009. In addition, based on the post-2009 investigations, the addendum should be clarified to explain that the proposed work would not address all of the release areas now known to exist at the site, or the addendum should be revised to address those areas too.

Response: The following sentences will be added to this section: "This work plan addresses COCs included in the ROD that have been identified in shallow soils/sediments. Additional contaminants identified during subsequent remedial activities that are not collocated with the ROD COC's to be excavated in this work plan will be addressed in a ROD amendment following this removal of shallow soils/sediments."

Comment 2: Section 4.0: A wetland restoration plan should be submitted prior to disturbing wetland areas.

Response: A site visit was conducted with Steve Ivas of the Conservation Commission on May 29 to discuss the specifics of the wetland impact, requirements, and restoration. A wetlands restoration plan will be prepared and submitted separately.

Comment 3: Section 4.2.2: To avoid a situation that could re-contaminate the drainage ditch, the Ditch excavation should be completed after the upland, pipe, and previous removal area excavations are completed and secured.

Response: The removals will occur in the order recommended.

Comment 4: Sections 4.2.5.1 and 4.2.5.2: All structures connected to the eastern ends of Pipe 1 and Pipe 4 should be assessed to determine if they are a potential sources of contamination (e.g., former secondary tanks containing waste material), and if so, such structures

should be secured to prevent a release of contaminants to surrounding soil, and any remaining potential source material should be assessed to determine if it should be removed from the site.

Response: **Pipes 1 and 4 will be excavated to their origin and a determination will be made whether other sources of contamination remain. Source material will be removed where feasible.**

Comment 5: Section 4.2.5.3: The full extent of Pipe 2, including any continuation east of the “first manhole” and any upslope pipes connected to the manhole, should be assessed and removed, and any structures connected to Pipe 2 and any extensions should be assessed to determine if they are potential sources of contamination (e.g., vaults, manholes, and treatment tanks containing waste material), and if so, such structures should be secured to prevent a release of contaminants to surrounding soil, and any contained potential source material should be assessed to determine if it should be removed from the site.

Response: **Any pipes that extend upslope of the manhole will be assessed to determine if further removal is warranted, and whether any waste material is present. Any waste material that is identified will be removed or secured to prevent further releases.**

Comment 6: Section 4.2.5.4: The full extent of Pipe 3, including any continuation east of the “first catch basin”, should be assessed and removed, and any structures connected to Pipe 3, including any upstream manholes and catch basins, should be assessed to determine if they are potential sources of contamination (e.g., catch basins containing contaminated sediment), and if so, such structures should be secured to prevent a release of contaminants to surrounding soil, and any contained potential source material should be assessed to determine if it should be removed from the site.

Response: **Any pipes that extend upslope of the first catch basin will be assessed to determine if further removal is warranted, and whether any waste material is present. Any waste material that is identified will be removed or secured to prevent further releases.**

Comment 7: Section 4.4: The results from immunoassay pesticide test kits may be unreliable indicators of extent of contamination because the contaminants of concern include chemicals that may not be spatially correlated with pesticides, including PAHs, PCBs, and metals. To improve reliability, MassDEP recommends that field screening also include visual and olfactory observations and PID and jar headspace readings.

Response: **Field screening procedures will be amended to include visual and olfactory observations and PID jar headspace readings.**

Comment 8: Worksheet 15: The contaminants of concern in soil should include dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene, DDD, DDE, and PCBs (refer to Comment 1).

Response: These contaminants will be added to Worksheet #15 as Contaminants of Concern with the associated PRG as a Project Action Limit.

Comment 9: Appendix A, Worksheet 17: To ensure the completeness of the pipe removal excavations, a multi-step screening and confirmation sampling program similar in design to past hangar floor-drain-removal maintenance actions should be conducted. The pipes and surrounding soil should be disturbed as little as possible when first exposed so that a careful visual inspection can be conducted to identify pipe breaches and defects that could have provided pathways for migration of contaminants from the inside the pipes to subsurface media. Potentially impacted soil should be field screened (e.g., visual, olfactory, PID, jar headspace readings, and immunoassay testing) to assess the potential presence of contaminant releases. Based on the screening results, confirmation samples should be targeted to verify that cleanup goals have been attained where releases are most-likely to have occurred (e.g., soil potentially impacted by releases from breaches and defects) or additional soil excavation should be conducted to remove enough impacted material to attain cleanup goals. Consistent with the sampling protocol proposed for the A2-B04 and A2-B05 excavations, four confirmation samples (three sidewalls and one floor sample) should be collected from any expanded excavation areas to confirm attainment of cleanup goals. Where no evidence of a release is encountered, the excavations should be subdivided into regularly spaced segments that do not exceed 25 feet in length, and at least one confirmation sample should be collected from the sidewall or bottom location most likely to be contaminated in each segment. To achieve conclusive results and avoid rework, detailed records should be acquired during the assessment and removal activities so the thought process followed to achieve completeness can be adequately documented in the completion report.

Response: The worksheet will be revised as suggested.

Comment 10: Appendix A, Worksheet 17: To ensure the completeness of the Ditch excavation, the northwest and southeast sidewalls (the longer pair of sidewalls) should be excavated to native material. One confirmation sample should be collected from the downslope (southwest) sidewall to confirm the downslope extent of contamination exceeding cleanup goals was captured. MassDEP recommends that floor samples be collected approximately 15 feet, 30 feet, and 45 feet downslope of the headwall location to confirm the vertical extent of contamination exceeding cleanup goals was captured.

Response: The worksheet will be revised as suggested.