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NAS SOUTH WEYMOUTH  
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U S NAVY RESPONSES TO COMMENTS ON THE DRAFT RECORD OF DECISION FOR  
THE INDUSTRIAL OPERATIONS AREA OF CONCERN 14 (OU 23), AREA OF CONCERN 83  
(OU 24), RIA 33 AND RIA 82 NAS SOUTH WEYMOUTH MA

8/20/2015

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**NAVY'S RESPONSE TO  
U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS DATED AUGUST 7, 2015  
and MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION (MASSDEP)  
COMMENTS DATED AUGUST 10, 2015 FOR DRAFT RECORD OF DECISION –  
INDUSTRIAL OPERATIONS AREA, AOC 14 (OU23), AOC 83 (OU24), RIA 33, AND RIA 82,  
DATED JULY 2015  
FORMER NAVAL AIR STATION SOUTH WEYMOUTH,  
WEYMOUTH, MASSACHUSETTS**

**EPA GENERAL COMMENT**

- 1. Comment:** The purpose of the document is to memorialize the selected remedy for IOA surface soils (0-2 feet below ground surface (bgs)). Although surface soils within the entire 20-acre area (identified as the "Industrial Area Boundary" on Figure 2-2) were evaluated in the 2011 field investigation, samples were not collected from areas where "no surface soil exposure was possible during industrial operations" (because they were covered by buildings or other structures) or from "closed sites where removal actions were completed or institutional controls consisting of AULs are in place". As such, the document needs to be clear that the seven exposure units not evaluated as part of the 2011 field effort (or the 2013 HHRA), as well as the closed sites with existing AULs, will not be addressed by this CERCLA remedial action. Specifically, any soils (surface and/or subsurface) associated with these areas will need be evaluated, as/if deemed necessary, as part of any building demolition or other soil disturbance/removal activities (if and when they occur). Also, since the existing AULs will remain on the property upon conclusion of the CERCLA action set forth in this document, the figures should clearly demarcate those areas that, upon conclusion of the selected remedy, will be available for unrestricted (i.e., residential) use from those that will not (i.e., not addressed by the ROD).

**Response:** Section 2.2 of the Draft Record of Decision (ROD) will be revised to concisely relay that the 2011 field activities were completed to address identified data gaps in the surface soil data set. Of the 49 Exposure Units (EUs) within the Industrial Operations Area (IOA), six EUs had complete historical surface soil data sets and therefore did not require further sampling in 2011. The seventh EU location was excluded because a portion of Building 117 comprises the entire EU (EU25), and there were no other suspected releases in this portion of Building 117 and therefore no basis for conducting additional sampling. If any impacts are identified by the future property owner and are attributable to Navy, then the Navy will address those impacts as warranted.

Figure 2-1 clearly demarcates the boundaries of the petroleum sites properly addressed under the Massachusetts Contingency Plan (MCP) and the two Activity and Use Limitation (AUL) Areas that, upon conclusion of the selected remedy, will be not be available for unrestricted use. The text of the ROD will be modified to clarify that AULs will restrict use in two areas of the site.

**EPA PAGE-SPECIFIC COMMENTS**

- 1. Comment:** Page 1, Section 1.2, 1st sentence – Please insert "(OU23)" after "(AOC) 14" and "(OU24)" after "AOC 83". Also, please confirm that AOC 14 is the "Drum Storage Area" (EPA has AOC 14 identified as the "Water Tower").

**Response:** Suggested revisions will be completed. The text will be revised to correctly refer to AOC 14 as the Water Tower.

2. **Comment:** Page 1, Section 1.2, 2nd sentence – Please insert “(SARA)” after “... Amendments and Reauthorization Act”.

**Response:** Suggested revision will be completed.

3. **Comment:** Page 3, Section 1.4, ¶ 1 – Please provide date and name of most recent “Reuse Plan” (if different from the plan approved in 2005 and amended in 2007) and confirm the current “established zoning” for this area (based on the most recent Reuse Plan).

**Response:** The following text in italics will be added to Page 3, Section 1.4, ¶ 1:

*“Implementation of the Selected Remedy is expected to achieve long-term risk reduction and will allow for the future recreational, residential, commercial, and institutional site uses as consistent with the established zoning in place at the time this ROD is executed.”* Please note the former NAS South Weymouth Reuse Plan was rescinded by an act of the Massachusetts State Legislature in July of 2014.

The established zoning districts are listed in Section 2.6, page 22, of the Draft ROD and are consistent with the current available information from the Southfield Redevelopment Authority.

4. **Comment:** Page 3, Section 1.4, ¶ 3 – For consistency with the Proposed Plan (PP), please insert the following text as the first bullet: “Pre-excitation soil sampling to further define areas to be excavated.”

**Response:** Suggested revision will be completed.

5. **Comment:** Page 3, Section 1.4, ¶ 3 – Please amend the second bullet to read, “Soil excavation and offsite disposal of soils with COC concentrations exceeding cleanup goals.”

**Response:** Suggested revision will be completed.

6. **Comment:** Page 3, Section 1.4, ¶ 3 – Please amend the third bullet to read, “Post-excitation soil sampling to confirm achievement of the RAO.”

**Response:** Suggested revision will be completed.

7. **Comment:** Page 3, Section 1.4, ¶ 4 – Please change “incorporated” to “located” in the second sentence.

**Response:** Suggested revision will be completed.

8. **Comment:** Page 3, Section 1.5, ¶ 1 – Please delete the last sentence. “Disposal” is not considered “treatment” for purposes of satisfying the statutory preference for treatment (for principle threats). Disposal is considered a “permanent” remedy, however, in that it provides long-term protection of human health and the environment after the RAO has been achieved.

**Response:** Suggested revision will be completed.

9. **Comment:** Page 4, Section 1.6, ¶ 1 – Please insert the following text after the header, above Table 1-1: “The locations of the specific information required to be included Section 2.0, Decision

Summary of the ROD are summarized in Table 1.1. Additional information can be found in the Administrative Record file for the former NAS-South Weymouth."

**Response:** Suggested revision will be completed.

10. **Comment:** Page 11, Section 2.2, ¶ 3 – See comment 1, above. All figures/maps should clearly demarcate those areas that, upon conclusion of the selected remedy, will be available for unrestricted (i.e., residential) use from those that will not (i.e., not addressed by the ROD). It is inappropriate and misleading to suggest that the entire 20-acres will be released for unrestricted use/unlimited exposure, upon conclusion of the remedial action, when there are areas covered by pavement, buildings or former building slabs that have yet to be evaluated or have existing AULs.

**Response:** Figure 2-1 clearly demarcates the two Activity and Use Limitation (AUL) Areas that, upon conclusion of the selected remedy, will be not be available for unrestricted use. The AUL areas will also be added to Figures 2-2, 2-3, and 2-4. However, the expectation is that the entire area of the IOA not encumbered with an existing AUL will be available for unrestricted use/unlimited exposure upon completion of this action. See response to General Comment 1.

11. **Comment:** Page 12, Figure 2-2 – See comments 1 and 10 above.

**Response:** The AUL areas will be added to Figure 2-2.

12. **Comment:** Page 14, Section 2.3, ¶ 3 – Please change "alternative" to "alternatives" in the second sentence.

**Response:** Suggested revision will be completed.

13. **Comment:** Page 15, Section 2.4, ¶ 2 – Please insert "surface soils" after "for the IOA" in the second sentence.

**Response:** Suggested revision will be completed.

14. **Comment:** Page 15, Section 2.4, ¶ 2 – Please amend the second half of the third sentence to read, ".... that are consistent with the established zoning, the Reuse Plan, and **existing AULs**,...."

**Response:** Suggested revision will be completed except reference to the "Reuse Plan" will be deleted.

15. **Comment:** Page 15, Section 2.3, ¶ 2 – Please insert "soil" between "residual" and "contamination" in the last sentence.

**Response:** The reference to Section 2.3 above appears to be for Section 2.4. The suggested addition will be included in Page 15, Section 2.4, ¶ 2.

16. **Comment:** Page 15, Section 2.3, ¶ 4 – Please insert, "that are the focus of this ROD" after "... four environmental sites" in the last sentence.

**Response:** The reference to Section 2.3 above appears to be for Section 2.4. Inserting the statement "that are the focus of this ROD" suggests that only the four active environmental sites within the IOA are being addressed by the ROD. Rather, the intent of the ROD is to address both the four active environmental sites within the IOA and the site-wide dispersion of contaminants in

surface soil across the entire 20-acre IOA. The first sentence of Page 15, Section 2.4, ¶ 4 will be deleted and ¶ 4 will be revised as follows:

"The focus of this ROD is for the site-wide dispersion of contaminants in surficial soil across the IOA, as well as the four active environmental sites located within the IOA. The other 13 environmental sites located within the IOA have already achieved regulatory closure through either the EBS/CERCLA program or the MCP program. Below is a summary of the four active environmental sites."

17. **Comment:** Page 15, Section 2.3, AOC 14 (OU23), ¶ 6 – Please amend the third sentence to read, "In 2010, AOC 14 was included in the evaluation of existing environmental sites within the IOA boundary to identify data gaps and assist in scoping additional sampling activities. A supplemental field investigation was conducted in 2011 to address the data gaps identified in historic surface soil sampling data. "

**Response:** The reference to Section 2.3 above appears to be for Section 2.4. The third sentence of Page 15, Section 2.4, AOC 14 (OU23), ¶ 6 will be revised as suggested.

18. **Comment:** Page 15, Section 2.3, AOC 14 (OU23), ¶ 6 – Please amend the beginning of the fourth sentence to read, "Results of the 2011 field effort, presented in the 2013 IOA Project Report, revealed.... "

**Response:** The reference to Section 2.3 above appears to be for Section 2.4. The fourth sentence of Page 15, Section 2.4, AOC 14 (OU23), ¶ 6 will be revised as suggested.

19. **Comment:** Page 16, Section 2.3, AOC 83 (OU24), ¶ 2 – Please amend the third sentence to read, "In 2010, AOC 83 was included in the evaluation of existing environmental sites within the IOA boundary to identify data gaps and assist in scoping additional sampling activities. A supplemental field investigation was conducted in 2011 to address the data gaps identified in historic surface soil sampling data."

**Response:** The reference to Section 2.3 above appears to be for Section 2.4. The third sentence of Page 16, Section 2.4, AOC 83 (OU24), ¶ 2 will be revised as suggested.

20. **Comment:** Page 16, Section 2.3, AOC 83 (OU24), ¶ 2 – Please amend the beginning of the fourth sentence to read, "Results of the 2011 field effort, presented in the 2013 IOA Project Report, revealed.... "

**Response:** The reference to Section 2.3 above appears to be for Section 2.4. The fourth sentence of Page 16, Section 2.4, AOC 83 (OU24), ¶ 2 will be revised as suggested.

21. **Comment:** Page 17, Section 2.5, ¶ 1 – Please amend the second sentence to read, "The establishment of the IOA boundary in 2009, provided for the continued evaluation of the four remaining active sites, as well as a site-wide assessment of low-level dispersed contamination in the 20-acre area."

**Response:** Suggested revision will be completed.

22. **Comment:** Page 17, Section 2.5, ¶ 1 – Please insert the following sentence at the end of the paragraph: "However, soils (surface and/or subsurface) covered by pavement, buildings or former building slabs or covered by existing AULs, will be evaluated, as/if deemed necessary, as part of any

future building demolition or other soil disturbance/removal activities performed in the area (if and when they occur)."

**Response:** Navy disagrees that additional sampling will be necessary prior to disturbing soil covered by pavement, buildings or former building slabs, as there is no basis for conducting additional sampling. If any impacts are identified by the future property owner and are attributable to Navy, then the Navy will address those impacts as warranted. The following sentence will be inserted at the end of ¶ 1 on Page 17, Section 2.5: "However, soils covered by existing AULs, will be evaluated, as/if deemed necessary, prior to soil disturbance/removal activities performed in the AUL areas." \_

23. **Comment:** Page 17, Section 2.5, ¶ 3 – Please insert "in surface soils" after "... where contaminant concentrations" in the second sentence.

**Response:** Suggested revision will be completed.

24. **Comment:** Page 18, Section 2.5.2, ¶ 1 – Please delete "residential RSLs" in the second sentence and insert "Regional Screening Levels (RSLs)".

**Response:** Comment noted. The acronym for RSLs is previously defined in the document (Section 2.2); therefore, the only revision to the above comment will be to delete "residential".

25. **Comment:** Page 22, Section 2.6, ¶ 5 – It is unclear why there isn't a permanent restriction on the use of IOA groundwater for drinking water purposes, given that "a medium-yield, potentially-productive aquifer area exists along the western portion of the IOA" and groundwater data was only compared to MCP GW-2 standards? Further clarification is warranted.

**Response:** Groundwater at the IOA was previously agreed by the BCT to be a media not of further concern based on the data and sites properly closed under the MCP program. Please refer to minutes of initial SAP scoping meetings. The screening of the data against MCP GW-2 standards was performed as a screening assessment to rule out vapor intrusion concerns, only.

26. **Comment:** Page 35, Section 2.8, ¶ 3 – Please insert the following text after "... based on exposures of hypothetical future residents to surface soil", "(while the HHRA evaluated potential risks to both the hypothetical future resident and the hypothetical future commercial receptor, the risk-based PRGs were calculated based future residential risks only, due to the fact that this exposure scenario is most protective, and therefore inclusive, of other potential future receptors in the IOA.)"

**Response:** Suggested revision will be completed.

27. **Comment:** Page 37, Section 2.9.1, ¶ 2 – Please change "have" to "provide" in the first sentence.

**Response:** Suggested revision will be completed.

28. **Comment:** Page 37, Section 2.9.1, ¶ 2 – Please confirm name and date of reuse plan referred to in the second sentence. See comment 3, above.

**Response:** Please note the former NAS South Weymouth Reuse Plan was rescinded by an act of the Massachusetts State Legislature in July of 2014. Reference to the Reuse Plan will be deleted.

29. **Comment:** Page 38, Section 2.9.2 – Further discussion is warranted regarding the public's recent request for sampling to confirm/deny the presence of PFCs in IOA soils. EPA supports the collection of a limited number of samples for PFC analysis (during either pre- or post- excavation sampling activities), focused in areas where AFFF is likely to have been stored, used and/or disposed (i.e., former fire house (Building 96) and gas station (Building 116)).

**Response:** Perfluorinated compounds (PFCs) will be included with a select number of anticipated post-excavation soil sampling to be performed at EU 49, as this is the only EU where AFFF is likely to have been stored, used, and/or disposed. As noted in Section 3.3 of the Draft ROD, the Navy is preparing to complete a comprehensive PFC investigation at Hangar 1 and several groundwater monitoring wells will be installed along the southern end of the IOA as part of that investigation. Data from the Hangar 1 study will assist with determining the potential presence of PFCs in the IOA and the need for further sampling.

30. **Comment:** Page 40, Section 2.10, Primary Balancing Criteria – Please delete the sentence beginning with, "The uncertain future use and land development plans..." and substitute it with language from the PP that states, "LUCs or a deed restriction would be required in conjunction with capping to prevent residential and recreation future use of the capped areas." There is no reason to believe, based on earlier statements regarding reuse, that future use and land development plans are "uncertain" at this time.

**Response:** Suggested revision will be completed.

31. **Comment:** Page 41, Section 2.10, Primary Balancing Criteria, ¶ 2 – For reasons discussed in comment 8, above, please delete the second sentence beginning with, "However, Alternative S-2 would provide..." and amend the first sentence to reflect the fact that none of the alternatives provide "treatment". There is no treatment involved in the excavation and off-site disposal of contaminated soils (or in the covering of soils with an asphalt cap).

**Response:** Comment noted. The subheading *Reduction in Toxicity, Mobility, and Volume Through Treatment* will be revised as follows:

"Neither alternative utilizes treatment technologies to reduce the toxicity, mobility or volume of COCs. Alternative S-2 addresses the on-site COC toxicity, mobility, and volume through permanent removal of COCs exceeding the cleanup goals from surface soil through excavation and offsite transport to a facility designed to secure contaminants. Alternative S-3 would achieve a lower level reduction in COC mobility by limiting infiltration of precipitation via the asphalt cap; however, capping would not decrease their toxicity or volume."

32. **Comment:** Page 42, Section 2.11- Typo. Please change "Treat" to "Threat".

**Response:** Suggested revision will be completed.

33. **Comment:** Page 43, Section 2.12.1, Rationale for the Selected Remedy, ¶ 1 – Please insert "CERCLA" between "final" and "remedy" in the last sentence. As discussed in general comment 1 above, the document needs to be clear that the seven exposure units not evaluated as part of the 2011 field effort (or the 2013 HHRA), as well as the closed sites with existing AULs, are not being addressed by this CERCLA remedial action.

**Response:** As discussed in the response to General Comment 1: Of the 49 EUs within the IOA, six had complete historical surface soil data sets and therefore did not require further sampling in 2011. The seventh location was excluded because a portion of Building 117 comprises the entire EU (EU25), and there were no suspected releases in this portion of Building 117. The text will be clarified to indicate that the closed MCP sites, which include two existing AUL areas, are not being addressed by this CERCLA remedial action.

**34. Comment:** Page 43, Section 2.12.2, Description of the Selected Remedy – For consistency with the June 2015, IOA Proposed Plan, please amend the list of remedy components to reflect the following:

- Pre-excavation soil sampling (to better define areas to be excavated)
- Site clearing (i.e., removal of asphalt/pavement from areas to be excavated)
- Excavation of soil with COCs exceeding PRGs
- Post-excavation confirmatory sampling (to confirm achievement of RAO)
- Off-site Disposal and transport of contaminated soils to a licensed facility
- Site restoration

**Response:** Suggested revision will be completed.

**35. Comment:** Page 45, Section 2.12.2, Pre-excavation soil sampling – Please see comment 29, above.

**Response:** Comment noted, see Comment 29 for response.

**36. Comment:** Page 45, Section 2.12.2 – For consistency, please include a brief description of each of the remedial components outlined above.

**Response:** Page 45, Section 2.12.2 will be updated to include a brief description for each of the bullets specified in Comment 34, above.

**37. Comment:** Page 46, Section 2.12.3, Expected Outcomes of the Selected Remedy – As discussed in general comment 1, above, this discussion needs to be amended to acknowledge that the seven exposure units, not evaluated as part of the 2011 field effort (or the 2013 HHRA), as well as the closed sites with existing AULs, are not being addressed by this CERCLA remedial action. Therefore, statements regarding the suitability of these areas for unrestricted land use under CERCLA are unsubstantiated.

**Response:** As discussed in the response to General Comment 1: Of the 49 EUs within the IOA, six had complete historical surface soil data sets and therefore did not require further sampling in 2011. The seventh location was excluded because a portion of Building 117 comprises the entire EU (EU25), and there were no suspected releases in this portion of Building 117. The text will be clarified to indicate that the closed MCP sites, which include two existing AUL areas, are not being addressed by this CERCLA remedial action and that the existing AUL areas are not suitable for unrestricted land use.

**38. Comment:** Page 46, Section 2.13, 4th bullet – Please amend the last sentence to read, “The selected remedy will be an effective and permanent means of eliminating COC concentrations in surface soils through excavation and offsite disposal.”

**Response:** Suggested revision will be completed.

39. **Comment:** Page 46, Section 2.13, 4th bullet – For reasons discussed in comments 8 and 31, above, please amend this discussion to reflect the fact that none of the alternatives addresses (or meets) this criteria. Excavation and offsite disposal is not considered treatment.

**Response:** The first sentence of the 4<sup>th</sup> bullet of Section 2.13, Statutory Determinations, will be revised as follows”

“Neither of the alternatives evaluated utilize treatment to address COC concentrations at the IOA. The selected remedy represents the maximum extent to which a permanent solution can be used in a practical manner at the IOA Site.”

40. **Comment:** Page 47, Section 2.14 and Responsiveness Summary – Please see comment 29. above. Further discussion is warranted regarding the inclusion of PFCs in either the pre- or post-excavation sampling event.

**Response:** Comment noted. Please see response to Comment 29.

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#### MASSDEP COMMENTS:

1. **Comment:** Section 2.7.1, Risk Characterization, Final Paragraph: Table 2-6 indicates that the first sentence should be corrected to note that unacceptable cancer risks were identified for commercial lifelong receptors and commercial child receptors. Please confirm/correct.

**Response:** The first sentence in Section 2.7.1, subheading Risk Characterization, final paragraph will be revised as follows:

“In summary, under the RME scenario, unacceptable cancer hazards were identified for hypothetical commercial receptors (child and lifelong) and hypothetical future residents (child and lifelong).”

2. **Comment:** Section 2.7.1, Summary: Preceding text (p. 32, first paragraph) suggests that EU-43 should be listed here with the EUs where surface soil was impacted by industrial operations; please revise text to include an explanation (e.g., concentrations less than PRGs).

**Response:** EU-43 will be added to this list of EUs where surface soil was impacted by industrial operations.

3. **Comment:** If not done previously, the pole-mounted transformer observed in EU-03 adjacent to the north wall of Building 13 during the 2011 field investigation should be assessed, and if appropriate, removed and properly disposed.

**Response:** The pole-mounted transformer present at EU03 will be assessed for polychlorinated biphenyls as part of the pre-excavation sampling activities.