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EMAIL REGARDING THE RESPONSE TO THE U S NAVY RESPONSE TO  
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON  
THE DRAFT SAMPLING AND ANALYSIS PLAN AT INDUSTRIAL OPERATION AREA  
FORMER NAS SOUTH WEYMOUTH MA  
12/11/2015  
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

**From:** [Chaffin, David \(DEP\)](#)  
**To:** [Helland, Brian J CIV NAVFAC MIDLANT, EV](#); [Barney, David A CIV NAVFACHQ, BRAC PMO](#); [Snyder, Michelle](#)  
**Cc:** [Keating.Carol@epa.gov](mailto:Keating.Carol@epa.gov); [Jennings, Lynne](#); [Malewicz, Anne \(DEP\)](#)  
**Subject:** RE: Draft IOA SAP RTCs for MassDEP comments  
**Date:** Friday, December 11, 2015 12:31:07 PM  
**Attachments:** [RTCs IOA Draft SAP 121015.pdf](#)

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For Use In Intra-Agency Policy Deliberations

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Responses to Navy Response to MassDEP Comments (RTCs) on draft SAP:

**RTC 3:** The response partially addresses the concern that PFCs may have migrated in AFFF spills to shallow soil near Building 96. A more detailed response is necessary to ensure that the sampling that is conducted will be conclusive. More specifically, a clearer description of the operations that may have released AFFF and the locations where those potential AFFF releases may have occurred must be documented to ensure the most likely migration pathways have been identified and sampled. If the proposed sampling is based on such an evaluation, please forward it as soon as possible. If a full evaluation has not been completed, MassDEP is willing to meet with the Navy sampling team at the site to discuss the probable release scenarios, identify probable migration pathways, and participate in the selection of sampling locations.

**RTC 4:** A significant datagap and obstacle to site closeout will remain if PCB sampling is not conducted in all of the PCB sampling areas identified in the draft final FFS report, and the two reasons provided in the response for not conducting the PCB delineation sampling specified in the draft final FFS report are unlikely to close this datagap.

The first reason is based on an incomplete summary of the team's decision making, in particular, the events that led to inclusion of the PCB delineation sampling in the draft final FFS report. As stated in the response, the team agreed in 2010 to assess the IOA using a minimum of one sample from each EU, the sampling conducted in 2011 was based on this assumption, and the results from the sampling were presented in the 2013 Project Report. The missing site history occurred after the Project Report was submitted: (1) based on the PCB results presented in the Project Report, the Team discussed the need for PCB delineation sampling during several BCT meetings (e.g., March 13, 2013 and February 12, 2014); (2) based on those discussions, the Navy submitted a draft removal action EE/CA (April 2014) that included the PCB delineation sampling in question - sampling on a 50-foot by 50-foot grid was proposed to: "...provide information confirming that the EUs [EU8, EU9, EU10, EU15, EU16, and EU17] have been characterized properly." – and (3) the PCB delineation sampling was included in the successor draft FFS Report (December 2014) and the draft final FFS Report (March 2015). The PCB delineation sampling was not included in the final FFS Report (April 2015) or the final ROD (September 2015) because EPA requested (March 3, 2015 comments) that sampling details be deferred to a post-ROD Remedial Action Work Plan (the SAP currently under review is a component of that plan). USEPA's request was administrative; it should not be construed as an opportunity to reduce the previously accepted scope of PCB delineation sampling.

The second reason does not ensure that the PCB datagap will be closed unless step-out sampling extends to all of the PCB delineation sampling locations identified in the draft final FFS report. If the sampling currently specified in the SAP does not lead to conducting step-out sampling, the characterization of the areas proposed for PCB delineation sampling in the FFS will not be conducted and the PCB delineation will be incomplete.

In summary, a significant datagap will likely remain if PCB sampling is not conducted in all of the PCB sampling areas identified in the draft final FFS report because the results from the samples currently proposed in the SAP will not provide data that can be used to assess or infer conditions in all the PCB sampling areas that were identified in the draft final FFS. In other words, based on the site conceptual model (undocumented surficial releases), the presence of a significant PCB release in the areas where PCB delineation sampling was proposed in the draft final FFS report cannot be ruled out with the results from the delineation samples now specified in the draft SAP.

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**From:** Snyder, Michelle [mailto:Michelle.Snyder@aecom.com]

**Sent:** Thursday, December 10, 2015 3:48 PM

**To:** Chaffin, David (DEP)

**Cc:** Helland, Brian J CIV NAVFAC MIDLANT, EV; Barney, David A CIV NAVFACHQ, BRAC PMO; Keating.Carol@epa.gov

**Subject:** Draft IOA SAP RTCs for MassDEP comments

Hello,

Attached please find RTCs to MassDEP comments to the Draft IOA SAP.

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