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NAS SOUTH WEYMOUTH
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EMAIL AND ATTACHED U S EPA REGION I COMMENTS ON THE DRAFT SPRING 2015 LONG TERM MONITORING EVENT REPORT FIRE FIGHTING TRAINING AREA FORMER NAS SOUTH WEYMOUTH MA
11/02/2015
U S EPA REGION I BOSTON MA

Site 4

Helland, Brian J CIV NAVFAC MIDLANT, EV

From: Keating, Carol <Keating.Carol@epa.gov>
Sent: Monday, November 02, 2015 10:08
To: Barney, David A CIV NAVFACHQ, BRAC PMO; Helland, Brian J CIV NAVFAC MIDLANT, EV
Cc: Chaffin, David (DEP); Snyder, Michelle; Kemp M. Gregory
Subject: RE: FFTA - Spring 2015 LTM Report
Attachments: SOWEY - FFTA Draft Spring 2015 LTM Report EPA Comments 110215.docx

Attached are EPA comments on the above-referenced document. Please feel free to call me with questions or concerns.

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EPA Review of the Draft Spring 2015 Long Term Monitoring Event Report
Fire Fighting Training Area
Former Naval Air Station South Weymouth,
Weymouth, Massachusetts
October 2015

GENERAL COMMENTS

1. Based on the monitoring results, the monitoring well network needs to be expanded to fill the spatial data gaps previously identified by EPA. Please refer to comments on Figure 6.

2. There are interval data gaps for the monitoring wells screens that may be causing misinterpretation of the monitoring data because PFCs detected in wells with longer screens may be present in the vicinity of wells with shorter screens but just not detected. The monitoring network also needs to be modified to address this concern. Please refer to comments on Figure 6.

3. As has been discussed previously, because groundwater in bedrock travels in fractures, Navy needs to identify downgradient fractures that are in communication with the source area wells in order to properly locate bedrock wells in downgradient locations.

PAGE-SPECIFIC COMMENTS

1. Page 9, Section 4.2 – For completeness, please also repeat the sentence from the PFOS discussion indicating that no sample could be collected from MW-14.

2. Page 10, Section 5.0, bullet 5 – The discussion in this bullet is incomplete. Please supplement it to acknowledge the following: "However, the October 2014 exceedance is an indication that PFCs are likely migrating downgradient in deeper groundwater and that a plume may exist north or south of MW-2D, a lobe of which was detected at MW-2D in October 2014."

3. Page 11, Section 5.0 – As noted by Navy, the sediment contaminant concentrations increased for this event whereas the surface water concentrations decreased which may just indicate that a greater surface water flow in the stream was responsible for the lower surface water concentrations. Since flow rate in the stream in not being measured, it is important to note that the surface water concentrations can be impacted by precipitation events. EPA recommends that gauging of the stream depth be performed in conjunction with surface water sample collection to provide insight into the stream volume or flow rate at the time of sampling.

4. Page 12, Section 6.0, ¶ 1 – The last sentence in this paragraph is misleading because there are five overburden wells within the source area but only one bedrock well; therefore, there is not enough data available to reasonably support Navy's conclusion. This sentence should be amended to acknowledge this data gap.

5. Page 14, Section 7.0 – The July 2013 date listed for the FFTA Explanation of Significant Differences is incorrect; it should be August 2013. Please correct.

6. Figure 6 – If Navy wants to investigate the near field groundwater before expanding the well network farther downgradient then the following changes to the proposed well network need to be considered.

- The proposed new well pair west of MW-11 needs to be moved south and placed no farther north than directly due west of MW-11.
- A well fence west of the road should be completed by installing a well pair 300 feet south of MW-61.
- The proposed shallow well at MW-51D2 appears unnecessary because the existing well already extends up to elevation 147 and would be expected to detect shallow contamination.
- The detection at MW-2D during the Fall 2014 monitoring event is evidence if not confirmation that the plume is migrating downgradient. Well pairs should be placed both north and south of MW-2D in an attempt to detect the plume; however, if an incremental approach is to be implemented, then after completion of the well fence west of the road and subsequent monitoring, the need for and placement of a well pair south of MW-2D can be evaluated.
- Additional wells farther west of MW-2D will eventually be required to properly evaluate the extent of downgradient contamination. The existing wells do not provide sufficient coverage either laterally or vertically to be of value.