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EMAIL AND ATTACHED U S EPA REGION I COMMENTS ON THE DRAFT RECORD OF
DECISION INDUSTRIAL OPERATIONS AREA AT AREA OF CONCERN 14 (AOC 14)
OPERABLE UNIT 23 (OU 23), AREA OF CONCERN 83 (AOC 83) OPERABLE UNIT 24 (OU
24), REVIEW ITEM AREA 33 (RIA 33) AND REVIEW ITEM AREA 82 (RIA 82) FORMER
SOUTH WEYMOUTH MA

08/07/2015

U S EPA REGION I BOSTON MA

Helland, Brian J CIV NAVFAC MIDLANT, EV

From: Keating, Carol <Keating.Carol@epa.gov>
Sent: Friday, August 07, 2015 14:51
To: Barney, David A CIV NAVFACHQ, BRAC PMO; Helland, Brian J CIV NAVFAC MIDLANT, EV
Cc: Chaffin, David (DEP); Snyder, Michelle; Gregory, Rona
Subject: RE: IOA ROD
Attachments: SOWEY - IOA Draft ROD EPA Comments.docx

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

Carol A. Keating

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From: Snyder, Michelle [mailto:Michelle.Snyder@aecom.com]
Sent: Wednesday, July 29, 2015 1:40 PM
To: Keating, Carol; David Chaffin
Cc: Brian J CIV NAVFAC MIDLANT EV Helland; David Barney A CIV BRAC Barney
Subject: IOA ROD

Hello,

Attached please find the Draft IOA ROD for your review. The hard copies will be sent via overnight today or tomorrow.

Michelle Snyder, CHMM

CTO Manager

Environment

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EPA COMMENTS
DRAFT RECORD OF DECISION
INDUSTRIAL OPERATIONS AREA
AOC 14 (OU23), AOC 83 (OU24), RIA 33 AND RIA 82

General Comments

1. 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).

Page-Specific Comments

1. 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").
2. Page 1, Section 1.2, 2nd sentence – Please insert "(SARA)" after "... Amendments and Reauthorization Act".
3. 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).
4. Page 3, Section 1.4, ¶ 3 - For consistency with the Proposed Plan (PP), please insert the following text as the first bullet: "Pre-excavation soil sampling to further define areas to be excavated."
5. 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."
6. Page 3, Section 1.4, ¶ 3 - Please amend the third bullet to read, "Post-excavation soil sampling to confirm achievement of the RAO."
7. Page 3, Section 1.4, ¶ 4 - Please change "incorporated" to "located" in the second sentence.

8. 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.
9. 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."
10. 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.
11. Page 12, Figure 2-2- See comments 1 and 10 above.
12. Page 14, Section 2.3, ¶ 3 – Please change "alternative" to "alternatives" in the second sentence.
13. Page 15, Section 2.4, ¶ 2 – Please insert "surface soils" after "for the IOA" in the second sentence.
14. 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,...."
15. Page 15, Section 2.3, ¶ 2 – Please insert "soil" between "residual" and "contamination" in the last sentence.
16. Page 15, Section 2.3, ¶ 4 – Please insert, "that are the focus of this ROD" after "... four environmental sites" in the last sentence.
17. 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. "
18. 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.... "
19. 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."
20. 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.... "

21. 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.”
22. 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).”
23. Page 17, Section 2.5, ¶ 3 - Please insert “in surface soils” after “... where contaminant concentrations” in the second sentence.
24. Page 18, Section 2.5.2, ¶ 1 - Please delete “residential RSLs” in the second sentence and insert “Regional Screening Levels (RSLs)”.
25. 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.
26. 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.)”
27. Page 37, Section 2.9.1, ¶ 2 - Please change “have” to “provide” in the first sentence.
28. 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.
29. 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)).
30. 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.

31. 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).
32. Page 42, Section 2.11- Typo. Please change “Treat” to “Threat”.
33. 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.
34. 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
35. Page 45, Section 2.12.2, Pre-excavation soil sampling – Please see comment 29. above.
36. Page 45, Section 2.12.2- For consistency, please include a brief description of each of the remedial components outlined above.
37. 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.
38. 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.”
39. 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.
40. 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.