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Mr. Mark Leipert
Department of the Navy
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop No. 82
Lester, Pennsylvania 19113-2090

Re: RIA 111 - Draft Closure Report
Environmental Baseline Survey
Former South Weymouth NAS
RTN 3-2621
January 13, 2005

Dear Mr. Leipert:

Please address the attached comments on the draft *Closeout Report for Maintenance and Mapping Activities at Review Item Area 111, Former Hangar 2*, dated January 6, 2005.

If you have any questions regarding this letter, please contact David Chaffin, Project Manager:
(617) 348-4005.

Very truly yours,

Anne Malewicz
Bureau of Waste Site Cleanup
Federal Facilities Section Chief

CC: D. Barney, USN-S. Weymouth
P. Marajh-Whittemore, USEPA
Executive Director, SSTTDC
RAB Members
J. Felix, DEP-Boston

**DEP COMMENTS ON
DRAFT CLOSURE REPORT
RIA 111 – MAINTENANCE AND MAPPING ACTIVITIES
S. WEYMOUTH NAVAL AIR STATION (RTN 3-2621)
JANUARY 13, 2005**

1. Section 1.0: The report should document the scope and results from the effort to obtain Navy drawings and plans pertinent to an evaluation of the Old Hangar 2 floor drain systems and sanitary systems.
2. Figure 1-1:
 - Please confirm the locations of samples NAS-RIA5-CB5 and NAS-RIA5-CB6, which appear to be inconsistent with the catch basin identifiers (even-numbered catch basins to west, odd-numbered catch basins to east) and catch basin connections identified in Appendix C.
 - Please confirm the location of the GCA Stand, which does not agree with the location shown in Figure 1 of the December 7, 2004 *Project Memorandum, Review Item Area 5 – Ground Control Approach Stand*.
3. Section 2.0: The report should explain how the locations of the three exploratory samples collected beneath the foundation (NAS-RIA5-SS01, NAS-RIA5-SS02, and NAS-RIA5-SS03) were selected, and the report should document the depths from which the samples were collected.
4. Section 3.0: Figure 1-1 indicates that more than 4,000 feet of pipeline were identified during the maintenance and mapping activities; however, Section 3.0 and Table 3-1 indicate that only 2,049 feet of subsurface components were jet-sprayed and camera-inspected, suggesting that a portion of the identified piping was not jet-sprayed. Please clarify the report to identify: (1) the portion of the identified piping that was not jet-sprayed and explain why that portion of the system was not cleaned, and (2) identify any portions of pipelines that were addressed during investigations of other sites (e.g., was the 48-inch RCP connected to the lift station overflow pipeline addressed as part of AOC 61?).
5. Section 3.0 indicates that a camera inspection was conducted in October 2004; however, Appendix C does not include any camera logs from that time. Please review and correct the report as appropriate.
6. Section 3.4: Please include a statement indicating whether or not any visual or olfactory evidence of oil or hazardous material was observed in the water that entered the lift station after the initial removal of standing water.
7. Section 3.7: In accordance with the November 2002 workplan, confirmation sampling should have been conducted because the camera inspections revealed that the integrity of pipelines is compromised (a 100-foot sample interval was specified).

8. Section 5.0: Prior to property transfer, the lift station pit should be decommissioned in accordance with 310 CMR 15.354.

9. Appendix C:

• The log from Inspection #8 (October 28, 2003), which indicates a connection exists between Catch Basin 3 and Catch Basin 5, is inconsistent with Figure 1-1, which does not show a connection between these catch basins. Please review and correct the report as appropriate.

• The log from Inspection #13 (October 28, 2003), which indicates a connection exists between Catch Basin 8 and Catch Basin 6, is inconsistent with Figure 1-1, which does not show a connection between these catch basins. Please review and correct the report as appropriate.

• The log from Inspection #20 (October 28, 2003), which indicates a connection exists between Catch Basin 6 and a catch basin located near a concrete barrier, is inconsistent with Figure 1-1, which does not identify a catch basin near a concrete barrier. Please review and correct the report as appropriate.

• The log from Inspection #21 (October 28, 2003), which indicates a connection exists between Catch Basin 6 and a catch basin to the west, is inconsistent with Figure 1-1, which does not show a connection between Catch Basin 6 and a catch basin located to the west. Please review and correct the report as appropriate.

• The log from Inspection #23 (October 28, 2003), which indicates a connection exists between Catch Basin 6 and Manhole 1, is inconsistent with Figure 1-1, which shows a connection between Catch Basin 5 and manhole 1. Please review and correct the report as appropriate.

10. The results from the maintenance and investigation activities indicate that further action is necessary to determine if oil or hazardous materials were released from the floor drain and septic systems to underlying soil and groundwater:

• Concentrations of one or more hazardous materials exceeded the EBS screening criteria in four of the six catch basin samples (Appendix A), including arsenic (≤ 52 mg/kg), chromium (≤ 240 mg/kg), lead ($\leq 1,200$ mg/kg), and Aroclor 1254 (≤ 1.9 mg/kg).

• Camera inspections revealed the presence numerous pipeline defects through which hazardous materials could have migrated to subsurface soil and groundwater.

DEP recommends the following additional investigations:

• The floor drain pipelines should be removed, and adjacent soils should be screened and sampled to assess the potential presence of oil and hazardous material.

• If the results from subsurface soil screening reveal the presence of a release that could extend to the water table, monitoring wells should be installed and sampled to determine whether or not groundwater quality has been impacted significantly. If releases to soil are not identified, a minimal groundwater screening program should be implemented to confirm the absence of a significant release to groundwater.

- The results from the RIA 5 soil and groundwater samples collected near the south end of the Old Hangar 2 footprint (SB01-070(5-7), SB01-071(5-7), SB01-072(1-3), SB01-072(6-8), and MW01-073) should be integrated into the RIA 111 investigation.
- All floor drain system points of discharge to French Stream should be evaluated to determine whether or not sampling is needed to assess the potential presence of a significant release to French Stream.
- Navy records should be reviewed to identify unknown floor drains, subsurface pipelines, and sanitary lines and connections. In addition, records should be reviewed determine if the maintenance activities conducted in Old Hangar 2 included the use of radium-bearing paints, and, if appropriate, radiation screening should be conducted.

11. Please schedule a site visit with DEP to inspect RIA 111 and associated points of discharge to French Stream.