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LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING DRAFT PROPOSED PLAN FOR BUILDING 82 HANGAR 2 OPERABLE UNIT 10 (OU 10) NAS SOUTH WEYMOUTH MA
02/07/2011
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Mr. Brian Helland, P.E.
Remedial Project Manager
BRAC PMO, Northeast
4911 South Broad Street
Philadelphia, PA 19112

Re: Draft Proposed Plan
Building 82 (Hangar 2) Site
Former NAS South Weymouth
MassDEP RTN 4-3002621
February 7, 2011

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, reviewed the draft *Proposed Plan, Building 82 (Hangar 2) - Operable Unit 10, Naval Air Station South Weymouth, Weymouth, Massachusetts,* received January 24, 2011. Comments are attached.

If you have any questions, I can be reached at (617) 348-4005.

Sincerely,

D. Chaffin

David Chaffin
Federal Facilities Project Manager
Bureau of Waste Site Cleanup

cc: D. Barney, USN-S. Weymouth
C. Keating, USEPA
Chief Executive Officer, SSTTDC
RAB Members

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TDD# 1-866-539-7622 or 1-617-574-6868
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MASSDEP COMMENTS ON
DRAFT PROPOSED PLAN
BUILDING 82 (HANGAR 2) SITE
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
FEBRUARY 7, 2011

1. Page 3, Site Background and Characteristics: In addition to providing a description of Building 82 and the surrounding area, the plan should provide a brief description of the actual disposal site that will be addressed by remedial action. The disposal site consists of several groundwater contaminant plumes that were identified during the remedial investigation. To support the site description, the plan should include a map that shows the locations of the contaminant plumes that will be remediated (GTM-2 plume, Building 15 plume, and NNPA plume) and the plan should identify the contaminants associated with each plume. In addition, the plan should include a figure that shows the locations of the areas where soil removal actions were completed (floor drains, GTMs, access road, northern drainage ditch).

2. Page 3, Floor Drain and Soil Removal: To identify contaminants of concern associated with the GTM-2 plume, the plan should list the specific VOCs that were encountered during the GTM removal actions, including TCA and DCA.

3. Page 3, Floor Drain and Soil Removal: The Proposed Plan should not be issued for public review until the completion report for the 2010 GTM removal action has been submitted to and accepted by the regulatory agencies.

4. Page 5, Access Road Excavations: The Proposed Plan should not be issued for public review until the completion report for the 2010 access road Limited Removal Action has been submitted to and accepted by the regulatory agencies.

5. Page 6, Drainage Ditch and Storm Sewer Cleaning: The Proposed Plan should not be issued for public review until the completion report for the 2010 northern drainage ditch removal action has been submitted to and accepted by the regulatory agencies.

6. Page 6, Right Column, *PCBs*: To avoid potential confusion about the need for remediation of PCBs in groundwater, the finding of PCBs in groundwater at concentrations exceeding drinking water criteria should be qualified by noting that the results from the most recent samples, collected in 2010, did not confirm the presence of PCBs in groundwater. Alternatively, the reference to drinking water criteria could be deleted from this section.

7. Page 6, RI Addendum Results: The Proposed Plan should not be issued for public review until the addendum report has been accepted by the regulatory agencies (the RI addendum report is currently under revision).

8. Page 7, Right Column: To characterize anticipated future uses of the site property, the plan should identify the activities and uses that will be allowed in the Village Central District zoning district.

9. Page 8, Left Column, Conclusions: The final sentence, which concerns the feasibility study, appears to be misplaced because it precedes the discussion of ecological risks that were assessed during the remedial investigation. Deletion is recommended.

10. Page 8, Right Column: The Proposed Plan should not be issued for public review until the feasibility study report has been accepted by the regulatory agencies (the feasibility study report is currently under review).

11. Page 9, Left Column: The statement indicating that Alternative G-2 (Chemical Oxidation) would require 20 to 25 years to complete cleanup appears to be inconsistent with the earlier statement indicating that the contaminants of concern would be oxidized in approximately one year. Because Alternative G-2 is expected to achieve cleanup much faster than the other alternatives (1 year vs. 25+ years), the plan should be clarified to ensure that the time advantage offered by Alternative G-2 is obvious.

12. Page 9, Right Column: The statement indicating that Alternative G-4 (Monitored Natural Attenuation) would require approximately 30 years to complete cleanup is inconsistent with the information presented in the feasibility study report, which indicates that Alternative G-4 would require 40 to 60 years to complete cleanup. Because Alternative G-4 is expected to require substantially more time to achieve remedial goals than Alternative G-2 (Chemical Oxidation) and Alternative G-3 (Enhanced Bioremediation), the plan should be clarified to ensure that the time disadvantage associated with Alternative G-4 is obvious.

13. Page 10, Preferred Alternative: The proposed selection of Alternative G-4 (Monitored Natural Attenuation) is inconsistent with the alternatives analysis presented in the plan and the feasibility study. As indicated in Table 1, Alternative G-2 (Chemical Oxidation) and Alternative G-3 (Enhanced Bioremediation) would provide superior permanence and superior contaminant reduction.

14. Table 1: The short-term protection rating for Alternative G-4 (Monitored Natural Attenuation) should be reduced to "poor" to reflect the relatively long cleanup time required for this alternative.

15. Glossary: The feasibility study listing should include the abbreviation "FS".

16. MassDEP cannot endorse the proposed selection of Alternative G-4 (Monitored Natural Attenuation):

- The expected cleanup time for Alternative G-4 is at least twice as long as the expected cleanup times for Alternatives G-2 and G-3 (40 to 60 years vs. 20 to 25 years), and actual cleanup times for Alternative G-4 could be substantially longer than estimated; available data are insufficient to allow a reliable prediction of natural attenuation rates.

- Based on expected cleanup times and the need to implement land use controls during the cleanup period, Alternative G-4 would impede full redevelopment of the site property for at least twice as long as Alternatives G-2 and G-3, and potentially substantially longer.

- As indicated in Table 1, Alternatives G-2 and G-3 would provide superior permanence and superior contaminant reduction.
- Cleanup costs for Alternative G-4 could be substantially greater than estimated if the duration of cleanup extends beyond the assumed 30-year period. For example, estimates in the feasibility study indicate that the cost of Alternative G-4 would be similar to the cost of Alternatives G-2 and G-3 if the cleanup time for Alternative G-4 extends to 90 years.