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LETTER AND COMMENTS FROM MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT BASIS OF DESIGN REPORT FOR WEST GATE
LANDFILL NAS SOUTH WEYMOUTH MA
08/28/2009
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION



COMMONWEALTH OF MASSACHUSETTS
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 Secretary

TIMOTHY P. MURRAY
 Lieutenant Governor

LAURIE BURT
 Commissioner

Mr. Brian Helland, RPM
 BRAC PMO, Northeast
 4911 South Broad Street
 Philadelphia, PA 19112

Re: Basis of Design Report
 West Gate Landfill,
 Former South Weymouth NAS
 RTN 4-3002621
 August 28, 2009

Dear Mr. Helland:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, has reviewed the draft *Basis of Design, West Gate Landfill Closure, Former Naval Air Station South Weymouth, South Weymouth, Massachusetts*, dated July 2009. Comments are attached.

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

Sincerely,

David Chaffin
 Federal Facilities Project Manager
 Bureau of Waste Site Cleanup

CC: D. Barney, USN-S. Weymouth
 K. Keckler, USEPA
 Executive Director, SSTTDC
 RAB Members
 A. Malewicz, MassDEP-Boston

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD# 1-866-539-7622 or 1-617-574-6868.

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**MASSDEP COMMENTS ON
DRAFT BASIS OF DESIGN
WEST GATE LANDFILL
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 4-3002621)
AUGUST 28, 2009**

1. Section 5.1: The report should indicate that confirmation sampling will be conducted to confirm that the removal of wastes from the adjacent wetland is complete and confirm that post-removal conditions in the adjacent wetland do not pose unacceptable risk to human health or the environment.
2. Section 5.3: The specifications in the bullet list concern the low permeability layer component of the cover system [310 CMR 19.112(6)], not the entire cover system ("cap") as suggested by the text. Thus, in addition to providing this brief description of the low permeability layer, the report should indicate that the cover system will include a drainage layer at least 6-inches thick [310 CMR 19.112(7)] and a vegetative layer of sufficient thickness to provide at least 18 inches of soil material above the low permeability layer [310 CMR 19.112(9)]. In addition, as acknowledged here, a landfill gas layer at least 6 inches thick will be required below the low permeability layer [310 CMR 19.112(5)] unless the results from the pre-design investigation demonstrate that it is not needed.
3. Section 5.5: The report should indicate that land use controls requirements will be specified in a separate remedial design document (e.g., Land Use Control Implementation Plan).
4. Section 5.6: The report should indicate that long-term monitoring requirements and long-term operations and maintenance requirements will be specified in separate remedial design documents (e.g., Long-Term Monitoring Plan and Operations and Maintenance Plan).
5. Section 6.2: The proposed cover system is incomplete (refer to Comment 2).
6. Figure C-3: The cover system depicted in these sections does not meet the requirements of 310 CMR 19.112, and is inconsistent with the text descriptions provided in the report. The revised report should present a cover system that meets the requirements of 310 CMR 19.112, and text and figures should agree.
7. Figure C-3, Northern Termination Detail: The report should be clarified to indicate whether or not construction of the cover system will alter, replace, or retain the drainage ditch that connects a culvert located on the north side of the site (adjacent to Trotter Road) to Wetland W-1. The presence of landfill debris in and immediately adjacent to this ditch (e.g., partially buried 55-gallon drum) indicates that the ditch may be contaminated; consequently, sampling and remediation of the ditch may be necessary where the ditch is not isolated under the cover system.