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NAS SOUTH WEYMOUTH  
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LETTER AND U S NAVY RESPONSE TO MASSACHUSETTS DEPARTMENT OF  
ENVIRONMENTAL PROTECTION COMMENTS REGARDING BASIS OF DESIGN  
DOCUMENTS FOR SITE 1 WEST GATE LANDFILL NAS SOUTH WEYMOUTH MA

09/29/2009

SHAW ENVIRONMENTAL AND INFRASTRUCTURE



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September 29, 2009

Brian J. Helland  
BRAC Program Management Office NE  
4911 South Broad Street  
Philadelphia, PA 19112-1303

**RE: RESPONSE TO BASIS OF DESIGN DOCUMENTS – WESTGATE LANDFILL  
CLOSURE, NAS SOUTH WEYMOUTH, WEYMOUTH, MASSACHUSETTES.  
CONTRACT N62470-08-D-1007, TASK ORDER WE03, SHAW PROJECT 136398**

Dear Mr. Helland:

The purpose of this correspondence is to respond to the comments received from the Massachusetts Department of Environmental Protection, dated August 28, 2009. Attached are the comments and our response. Comments will be addressed in the upcoming 30% design submittal. Due to the compressed design schedule, a revised Basis of Design will not be developed.

Thank you for providing Shaw Environmental & Infrastructure, Inc. with this opportunity. Should you have questions or comments please do not hesitate to call me at (609) 588-6349.

Sincerely,  
Shaw Environmental, Inc

Steven Kawchak  
Project Manager

Enclosures (1)

cc.  
William Deane           Shaw Environmental, Inc.  
James Dunn             Shaw Environmental, Inc.  
Project File             136398

**MassDEP Comments on  
Draft Basis of Design  
West Gate Landfill  
Former South Weymouth Naval Air Station (RTN 4-3002621)  
September 29, 2009**

1. **MaDEP #1:** "Section 5.1 – The report should indicate that conformation 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.."

**RESPONSE:** Shaw will develop, with cooperation from MaDEP, EPA and US Navy a Quality Assurance Project Plan (QAPP) that will incorporate confirmatory sampling protocols for the West Gate and Small Landfills. The QAPP will be a part of the Remedial Action Work Plan.

2. **MaDEP #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."

**RESPONSE:** Section 5.3 addresses specifically within the bullets, the low permeability layer. However the section as a whole describes the cap construction. It is the intent of Shaw to determine the need and thickness of a drainage layer, gas venting layer, and vegetation layer during the PDI.

As Shaw finalizes its design, the Navy will forward to all parties for comment and review.

3. **MaDEP #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)."

**RESPONSE:** A Land Use Control Implementation Plan will be developed as a separate remedial design document.

4. **MaDEP #4:** "Section 5.6: The report should indicate that long-term monitoring requirements and long-term maintenance operations and maintenance requirements will be specified in separate remedial design documents (e.g. Long-Term Monitoring Plan and Operations and Maintenance Plan.)"

**RESPONSE:** Long Term Monitoring and O&M Plans will be developed.

5. **MADEP #5:** "Section 6.2: The proposed cover system is incomplete (refer to Comment 2)"

**RESPONSE:** See response to MaDEP #2

6. **MaDEP #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."

**RESPONSE:** The 30% design will correct any inconsistencies and will present a cover system that meets the requirements of 310 CMR 19.112.

7. **MaDEP #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."

**RESPONSE:** The 30% design will indicate the ditch will be altered, as the debris will be excavated to remove it from the wetlands area. Sampling will occur per comment MaDEP #1. After confirmation of debris removal and no contamination, the ditch will be restored to allow for the connection to Wetland W-1.