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U S NAVY RESPONSE TO U S EPA COMMENTS TO FINAL DECISION DOCUMENT ITEM
AREA 10C WITH TRANSMITTAL NAS SOUTH WEYMOUTH MA
12/22/2009
TETRA TECH NUS



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C-NAVY-12-09-3455W

December 22, 2009

Project Number G02073

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

Reference: CLEAN Contract No. N62470-08-D-1001
Contract Task Order (CTO) No. WE11

Subject: Responses to Comments, Final Review Item Area 10C Decision Document
Naval Air Station South Weymouth, Weymouth, Massachusetts

Dear Mr. Helland:

Tetra Tech NUS, Inc. (TtNUS) has prepared responses to comments (RTCs) received from the U.S. Environmental Protection Agency (EPA) and Massachusetts Department of Environmental Protection (MassDEP) on the draft final Decision Document for Review Item Area 10C, Naval Air Station South Weymouth, Weymouth, Massachusetts. The changes noted in the RTCs have been incorporated into the document. The final Decision Document is enclosed along with the RTCs. Once EPA and MassDEP concur with the No Further Action recommendation, the site will be considered suitable for transfer.

Through copy of this letter, the RTCs and Final Decision Document for Review Item Area 10C are being provided to the recipients listed below. Any questions regarding the document should be directed to your attention at (215) 897-4912. Please contact me at (978) 474-8403 should you have any questions.

Very truly yours,

Phoebe A. Call
Project Manager

PAC/lh

Enclosures

c: D. Barney, Navy (w/encl. - 1 paper, 1 CD)
K. Keckler, EPA (w/encl. - 3 paper, 1 CD)
D. Chaffin, MassDEP (w/encl. - 1 paper, 1 CD)
P. Golonka, Gannett Fleming
(w/encl. - 1 paper, 1 CD)
Y. Walker, Naval Environmental Health Center
(w/encl. - 1 CD)
P. Sortin, Abington (w/encl. - 1 CD)
D. McCormack, Weymouth (w/encl. - 1 paper)
M. Parsons, Rockland (w/encl. - 1 CD)
Tufts Library, Weymouth (w/encl. - 1 CD)
Public Library, Abington (w/encl. - 1 CD)

Public Library, Rockland (w/encl. - 1 CD)
Public Library, Hingham (w/encl. - 1 CD)
Chief Executive Officer, South Shore Tri-town
Development Corp. (w/encl. - 1 paper, 1 CD)
R. Daniels, LNR Property Corp. (w/encl. - 1 CD)
T. Campbell, TtNUS (w/encl. - 1 paper)
J. Trepanowski, TtNUS (w/encl. - 1 CD)
G. Wagner, TtNUS (w/encl. - 1 paper, 1 CD)
G. Glenn, TtNUS (w/o encl.)
File G02073-3.2 (w/o encl.);
G02073-8.0 (w/encl. - 1 each)

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**NAVY RESPONSES TO U. S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
COMMENTS DATED DECEMBER 3, 2009
DRAFT FINAL RIA 10C DECISION DOCUMENT (NOVEMBER 2009)
NAVAL AIR STATION SOUTH WEYMOUTH, WEYMOUTH, MASSACHUSETTS**

Navy responses to the EPA comments on the Draft Final RIA 10C Decision Document are provided below. The EPA comments are presented first (in italics) followed by Navy's responses.

GENERAL COMMENTS

General Comment 1: *EPA's comment on the 2004 Removal Action Report noted that the ultimate discharge location for the floor drains and sinks needed to be identified. As noted, "based on the types of operations that were conducted in the lean-tos, this represents a significant data gap that needs to be addressed before the site can be closed out." The Navy provided information indicating that some of the floor drains and sinks discharge ultimately to the Base storm drain system. For many of the drains/sinks and for all of those in the North Lean-To, the ultimate discharge location is presumed to be the Base storm drain system. EPA questions the appropriateness of this presumption. The drains could have discharged to drywells (or a septic system). Have drywells been discovered at SOWEY? Please explain what information was used to conclude that discharge was to the storm drain system. What has been done to physically investigate (i.e., excavate) the drains to track the discharge path?*

Response: Historic Hangar 1 plans (North Lean-to First Floor Plumbing Y&D Drawing number 594554 and South Lean-to First Floor Plumbing Y&D Drawing number 594556) were reviewed to determine the ultimate discharge locations of floor drains and sinks. No drywells were noted on these historic plans. In addition, Stone and Webster produced a table which summarized the former activities and uses in the north and south lean-tos. This table, included in the RIA 10C decision document in Appendix A, does not include any observations of drywells in the lean-tos. All historic Hangar 1 plans are available for review at the NAS South Weymouth Caretaker Site Office should EPA wish to verify this information.

SPECIFIC COMMENTS

Comment 1. §4.1.1: *Please include iron the first unnumbered table because it also exceeded the human health benchmark.*

Response: The imbedded table in Section 4.4.1 has been revised per the comment.

Comment 2. §5.1: *Please include iron in the unnumbered table and discuss how the detected concentration compares to background.*

Response: The imbedded table and text in Section 5.1 have been revised per the comment.

Comment 3. §5.2: *Please revise the discussion in the paragraph starting with "Due to slow recharge..." The sentence "Concentrations of aluminum, chromium, heptachlor, lead, and vanadium in the other samples at RIA 10C do not exceed benchmarks" is correct but disregards the fact that the 2004 concentrations in MW05-306 still exceed the human health benchmark for iron, manganese, and antimony. Please add "Although MW05-306 had lower metals concentrations in 2004 than in 2003 probably owing to lower turbidity, the concentrations of iron, manganese and antimony in 2004 still exceed the human health benchmark." This paragraph should also indicate that human health benchmarks were exceeded in monitoring wells in addition to MW05-306, i.e. manganese in MW05-305, -307, -308 and iron in MW05-305, and -307.*

Response: The following text has been added to Section 5.2:

“Although MW05-306 had lower metals concentrations in 2004 than in 2003, probably owing to lower turbidity, the concentrations of antimony, iron, and manganese in 2004 still exceed the human health benchmark. In addition, as shown in Table 4, the human health benchmarks were exceeded in monitoring wells MW05-305, -307, and -308 for manganese and in monitoring wells MW05-305 and -307 for iron.”

Comment 4. §5.2: *Please revise the discussion in the paragraph starting with “The concentration of antimony...” Since iron, manganese and antimony exceeded benchmarks, it is incorrect to state that “...antimony was the only analyte detected in groundwater above benchmark (sic)...” To be consistent with the discussion about antimony, this paragraph should also discuss whether the maximum concentrations of iron and manganese exceed 10X the benchmark and background.*

Response: The following text has been added to Section 5.2:

“Iron was detected above the human health benchmark but not the 95% UPL in MW05-305, -306, and -307. The EPA RBC for iron (11,000 µg/L [10 times greater than the human health benchmark being used]-published 1998) was exceeded in the 2003 sample from MW05-306 (43,000 µg/L) but not the 2004 sample from MW05-306 (11,000 µg/L). Neither concentration exceeded the 95% UPL (44,137.52 µg/L).

Manganese was detected above the human health benchmark but not the 95% UPL in MW05-305, -307, and -308. The EPA RBC for manganese (730 µg/L [10 times greater than the human health benchmark being used]-published 1998) was exceeded in the MW05-305 (1,200 µg/L) and the 2003 sample from MW05-306 (780 µg/L). Neither concentration exceeded the 95% UPL (2,680.63 µg/L).”

Comment 5. §6.0: *Please revise this section to reflect the requested changes.*

Response: Section 6.0 has been revised to include text to address the requested changes in the previous two comments.

Comment 6. Table 4: *Several of the test method numbers in the first column have a suffix of “(T)” [e.g. SW6010B (T)]. Please provide an explanatory footnote for this suffix. Also, please include a footnote that indicates that the turbidity in MW05-306 was lower in 2004 than in 2003.*

Response: While the available information from the EBS investigations in 2003 and 2004 does not define the meaning of the suffix “T” shown in Table 4, it is assumed to represent analysis for total inorganics. Since this can not be confirmed, the “T” was deleted from Table 4.

Comment 7. References: *Please provide a reference for the Foster Wheeler 2003 video survey (page 4).*

Response: The description of the Foster Wheeler 2003 video survey was taken from the *Final Removal Action Report for the Removal of the North and South Lean-to Storm Drainage Systems* (June 2004). This report has been added to the reference section and the reference added to page 4.

**NAVY RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION
(MASSDEP) COMMENTS (DATED DECEMBER 7, 2009)
DRAFT FINAL RIA 10C DECISION DOCUMENT (DECEMBER 2009)
NAVAL AIR STATION SOUTH WEYMOUTH, WEYMOUTH, MASSACHUSETTS**

Navy responses to the MassDEP comments on the Draft Final RIA 10C decision document are provided below. The MassDEP's comments are presented first (in italics) followed by Navy's responses.

Specific Comment 1: *Section 2.1.2: To address the uncertainties associated with the soil sampling conducted to assess the potential releases of solvents from the two former degreaser locations, and to address the potential presence of solvent releases from the parachute shop, the decision document should include screening of the analytical results from groundwater samples collected from monitoring wells MW05-302, MW05-303, and MW05-304. As shown in Figures 8 and 9, water level measurements wells indicate that wells MW05-302 and MW05-303 are located downgradient of the degreasing area in the north lean-to, and well MW05-304 is located downgradient of the degreasing area and parachute shop in the south lean-to.*

Response: Monitoring wells MW05-302, MW05-303, and MW05-304 were installed as part of the Area of Concern Hangar 1 floor drain investigations. As noted in Navy's December 15, 2009 Responses to Comments on the Area of Concern Hangar 1 Streamlined Human Health Risk Assessment (HHRA), groundwater data for monitoring wells MW05-302, MW05-303, and MW05-304 have been incorporated into the HHRA and evaluated consistent with the streamlined risk assessment process. The RIA 10C Decision Document includes an evaluation of the groundwater data from monitoring wells MW05-305, MW05-306, MW05-307 and MS05-308, screened against human health benchmarks consistent with the EBS decision document process. The results of the groundwater evaluations presented in the two documents indicate no anticipated risks to human health from groundwater from either RIA 10C or AOC Hangar 1.