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RESPONSES TO U S NAVY COMMENTS TO SAMPLING AND ANALYSIS PLAN REVISION
WEST GATE LANDFILL NAS SOUTH WEYMOUTH MA
7/23/2012
WATERMARK

Watermark
Engineering • Construction • Operations

Environmental
Infrastructure
Buildings & Facilities

July 23, 2012

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

Subject: **Responses to Comments on the West Gate Landfill Revised Sampling and Analysis Plan**
(Field Sampling Plan and Quality Assurance Project Plan)
Former Naval Air Station South Weymouth, Weymouth, Massachusetts

Dear Mr. Helland:

Watermark Environmental, Inc. has prepared responses to comments (RTCs) received on the West Gate Landfill Revised Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan). The enclosed RTCs address comments received from the Massachusetts Department of Environmental Protection dated June 25, 2012.

On behalf of the Navy, the RTCs on the West Gate Landfill Revised Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan, Watermark, 2012.) are being provided to the recipients listed below. If you have any questions regarding the document, please contact me at (215) 860-7700.

Sincerely,
WATERMARK

Roxanne Clarke
Project Manager

Enclosures: Response to Comments
Updated QAPP Worksheets

cc: D. Barney, Navy
C. Keating, USEPA Region I
D. Chaffin, MassDEP
Executive Director, South Shore Tri-Town Development Corp.
R. Daniels, LNR Property Corporation
Librarian, Tufts Library, Weymouth
Librarian, Public Library, Abington
Librarian, Public Library, Rockland
Librarian, Public Library, Hingham
P. Sortin, RAB Member
M. Parsons, RAB Member
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NAVY RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION (MASSDEP) COMMENTS (DATED JUNE 25, 2012)
REVISED SAMPLING AND ANALYSIS PLAN (FIELD SAMPLING PLAN AND QUALITY ASSURANCE PROJECT PLAN), WEST GATE LANDFILL
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS

The Navy's responses to the MassDEP's comments on the Revised Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) for the West Gate Landfill are presented below. The MassDEP comments are presented first (in italics) followed by Navy's responses.

Comment 1: *Worksheet 16 should list field activity dates and report preparation dates for the second monitoring event of the third monitoring year.*

Response: Worksheet 16 has been revised to list activity dates and report preparation dates for the second monitoring event of the third monitoring year. See attached revised Worksheet 16.

Comment 2: *Worksheet 21, Appendix A, and Appendix C: The plan should explain the inclusion of an SOP and sampling form for soil gas sample collection - was this SOP included as a contingency to be used if an exceedance is reported in the landfill perimeter gas probe samples?*

Response: The SOP and field form were included for contingency purposes, in the event an exceedance is detected during the landfill perimeter gas probe monitoring, which would require landfill gas sampling. A note has been added to Worksheet 21 to indicate this. See attached revised Worksheet 21.

SAP Worksheet #16 -- Project Schedule / Timeline Table
(UFP-QAPP Manual Section 2.8.2)

				Annual Report			
Year	**Event**	**Begin Fieldwork**	**Data Report**	**Draft Report**	**Regulators Comments Due**	**Final Report**	**Media Monitored for Each Event**
1	1st	Dec. 2011	Feb. 2012				Landfill gas, groundwater/surface water/sediment
1	2nd	March 2012	May 2012				Landfill gas, groundwater/surface water/sediment
1	3rd	June 2012	Aug. 2012				Landfill gas, groundwater/surface water/sediment
1	4th	Sept. 2012	Nov. 2012	Dec. 2012	Jan. 2013	March 2013	Landfill gas, groundwater/surface water/sediment
2	1st	Dec. 2012	Feb. 2013				Landfill gas, groundwater/surface water/sediment
2	2nd	March 2013	May 2013				Landfill gas, groundwater/surface water/sediment
2	3rd	June 2013	Aug. 2013				Landfill gas, groundwater/surface water/sediment
2	4th	Sept. 2013	Nov. 2013	Dec. 2013	Jan. 2014	March 2014	Landfill gas, groundwater/surface water/sediment
3*	1st	March 2014	May 2014				Landfill gas**, groundwater/surface water/sediment
3*	2nd	September 2014	Nov. 2014	Dec. 2014	Jan. 2015	March 2015	Landfill gas**, groundwater/surface water/sediment

Note: The WGL LTM results will be included in the next Five-Year Review for NAS South Weymouth, to be completed in July 2014.

The duration of long-term activities will be 30 years. Analytical results will be submitted to regulatory agencies within 60 days after the date of sample collection, or as soon as data are available.

* The schedule for year 3 will be followed for the rest of the 30-year monitoring period unless a change is agreed to by the regulators.

**Landfill gas monitoring will continue on a quarterly basis until a change in frequency is approved by the regulators. Necessary notifications will be submitted at the time of monitoring and all data will be reported in the semi-annual reports

SAP Worksheet #21 -- Project Sampling SOP References Table
(UFP-QAPP Manual Section 3.1.2)

Reference Number	Title, Revision Date and / or Number	Originating Organization of Sampling SOP	Equipment Type	Modified for Project Work? (Y/N)	Comments
ENG-006	Sample Handling and Custody Requirements, Revision 1, October 2007	Watermark	NA	N	SOP is included in Appendix A.
ENG-007	Field Sampling Equipment Decontamination, Revision 1, October 2007	Watermark	Decontamination Equipment (scrub brushes, phosphate free detergent, de-ionized water)	N	SOP is included in Appendix A.
ENG-008	Groundwater Sampling Using Low Stress/Low Flow Technique, Revision 2, March 2011	Watermark	Submersible pump, multi-parameter meter, turbidimeter	N	SOP is included in Appendix A.
ENG-014	Field Notes and Documentation, Revision 0, October 2009	Watermark	Field Logbook, Field Sample Forms, Boring Logs	N	SOP is included in Appendix A.
ENG-015	Water Level Measurements, Revision 0, October 2007	Watermark	Electronic water level indicator	N	SOP is included in Appendix A.
ENG-021	Soil Gas Sample Collection, Revision 0, July 2008	Watermark	Summa canisters, flow controllers	N	SOP is included in Appendix A.*
GH-2.5	Groundwater Contour Maps and Flow Determinations; Revision 1, February 2009	Tetra Tech	Photo-ionization detector, electronic water level indicator	N	SOP is included in Appendix A. Also see Appendix C-1 for project-specific procedures.
SA-1.1	Groundwater Sample Acquisition and Onsite Water Quality Testing, Revision 7, April 2008	Tetra Tech	Groundwater Sample Collection	N	SOP is included in Appendix A
SA-1.2	Surface Water and Sediment Sampling; Revision 5, March 2008	Tetra Tech	Groundwater quality meters	N	SOP is included in Appendix A.

* This SOP has been provided for contingency purposes, in the event an exceedance is detected during the landfill perimeter gas probe monitoring, which would require landfill gas sampling.