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U S NAVY RESPONSE TO REGULATOR COMMENTS TO DRAFT PROPOSED PLAN
BUILDING 82 WITH TRANSMITTAL NAS SOUTH WEYMOUTH MA
7/19/2012
TETRA TECH



C-NAVY-07-12-5094W

July 19, 2012

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, Draft Proposed Plan – Building 82
Draft Final Proposed Plan – Building 82
Naval Air Station South Weymouth, Weymouth, Massachusetts

Dear Mr. Helland:

Tetra Tech, Inc. has prepared responses to comments (RTCs) received from the U.S. Environmental Protection Agency (EPA) and Massachusetts Department of Environmental Protection (MassDEP) on the Proposed Plan for the Building 82 Site at the former Naval Air Station South Weymouth, Weymouth, Massachusetts. The document has been revised in accordance with the RTCs; the changes are shown in yellow highlighting to assist in review of the document. Suggested dates for the public comment period, public meeting and hearing have been added and are also shown in yellow highlighting. A prompt review of the enclosures is requested to accommodate the suggested public comment period and hearing dates and thus complete the Record of Decision this fiscal year.

On behalf of the Navy, the RTCs on the draft Proposed Plan and the draft final Proposed Plan for the Building 82 Site are being provided to the recipients listed below. If you have any questions regarding the document, please contact me at (978) 474-8403.

Very truly yours,

A handwritten signature in black ink that reads 'Phoebe A. Call'.

Phoebe A. Call
Project Manager

PAC/lh

Enclosure

- c: D. Barney, Navy (w/encl. – 1)
- C. Keating, EPA (w/encl. – 3)
- D. Chaffin, MassDEP (w/encl. – 1)
- Chief Executive Officer, South Shore Tri-town Development Corp. (w/encl. – 1)
- R. Daniels, LNR Property Corp. (w/encl. – 1)
- J. Trepanowski, Tetra Tech (w/o encl.)
- G. Glenn, Tetra Tech (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 JUNE 28, 2012
DRAFT PROPOSED PLAN – BUILDING 82
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

The Navy's responses to the EPA comments on the Building 82 Draft Proposed Plan (dated May 2012) are presented below. The EPA comments are presented first (in italics) followed by Navy's responses.

GENERAL COMMENT

1. As mentioned in EPA's comments on the Building 82 Feasibility Study (FS), a pre-design investigation will be required at the Site to better characterize deep groundwater because prior investigations have not adequately characterized the overburden down to bedrock in areas with potentially elevated TCE concentrations.

Response: Comment noted. The FS mentions a planned baseline groundwater sampling event and the need for a pilot study and treatability testing. As indicated in the Navy's previous responses, these issues will be addressed in the remedial design phase following selection of a remedy and completion of the ROD for the Site.

PAGE-SPECIFIC COMMENTS

1. Page 2, second to last paragraph – Please insert, "...or Operable Unit (OU) 11" at the end of the last sentence.

Response: The following text has been added: "...also referred to as OU 11."

2. Page 3, ¶ 1, right column – Please delete "the" prior to hangar in the first sentence.

Response: The suggested change has been made.

3. Page 5, ¶ 1, left column – Please explain why the number of borings is different from that originally reported in the November 2011 document. Also, the conversion of 13,500 cubic feet (reported in the November 2011 document) to cubic yards (in the May 2012 document) appears to be incorrect. Please check the calculation.

Response: The details of the maintenance action activities were clarified and corrected for consistency with the Final Maintenance Action Completion Report. Soil volumes excavated and removed are provided in cubic yards in the report and thus included in this version of the document.

4. Page 5, ¶ 3, right column, last sentence – Please explain why the approximate volume of soils removed during the September 2010 removal action is different from that originally reported in the November 2011 document.

Response: Please see the Response to Comment No. 3 above.

5. Page 9, Summary of Remedial Alternatives, ¶ 2, left column – Please amend the second sentence to read, "The LUCs would: (1) prohibit the installation of groundwater extraction wells for production, supply, or irrigation at the Building 82 site."

Response: The suggested change has been made.

6. Page 9, Summary of Remedial Alternatives, ¶ 4, left column – Please amend the sentence to read, "..... exposure to contaminated groundwater for production, supply or irrigation use..."

Response: The suggested change has been made.

7. Page 9, Alt. G-2, ¶ 2, right column – Please move this paragraph to the beginning of the fourth paragraph (where time to achieve RAOs is discussed) and replace with the language from the November 2011 document (i.e., “LUCs would be implemented as described in the Summary of Remedial Alternatives.”)

Response: Disagree. The discussion of each component of Alternative G-2 presents the specific RAO achieved by implementation of each component. Please note that the fourth paragraph pertains to MNA/RAO No. 3 only.

However, the second paragraph has been revised as follows: “Interim LUCs would be implemented as described in the Summary of Remedial Alternatives. RAO No. 1 would be achieved immediately upon implementation of the interim LUCs.”

8. Page 9, Alt. G-2, ¶ 3, right column – While the current plan is to collect groundwater samples from selected, existing monitoring wells, this does not preclude the installation of additional, new monitoring wells, if deemed necessary.

Response: Comment noted. The objective of the baseline sampling event is to collect data from existing wells for comparison to data from the RI and aid in the remedial design and development of the long-term monitoring plan. The need for new monitoring wells will be considered as noted in the Response to Comment #10 below.

9. Page 9, Alt. G-2, ¶ 3, right column – For reasons discussed in the General Comments section above, please amend the fourth sentence to read, “Prior to the remedial design, a baseline groundwater sampling event would be conducted to establish baseline conditions and to assist in the preparation of the long-term monitoring plan.”

Response: The suggested change has been made.

10. Page 9, Alt. G-2, ¶ 3, right column – While the current plan is to use existing monitoring wells to monitor the progress and effectiveness of EOS, this does not preclude the installation of new monitoring wells, if deemed necessary.

Response: Agreed. The need for new monitoring wells will be determined during development of the long-term monitoring plan and evaluation of the data from the baseline groundwater sampling event. Please note that Alternative G-2 includes chemical oxidation; EOS is referenced in the in-situ enhanced bioremediation component discussion for Alternative G-3.

11. Page 9, Alt. G-2A, ¶ 1, right column – Please amend the last sentence to read, “Following the collection of Phase I performance data and completion of Phase 2 injections, groundwater samples will be collected quarterly for the first year, semi-annual for the next two years, and annually, thereafter, to monitor the progress of remediation and confirm that groundwater concentrations have achieved PRGs and that no rebounding has occurred.”

Response: Disagree. The description of the performance monitoring for Alternative G-2A on page 9 is consistent with the discussion in the FS. Long-term monitoring is discussed on page 10. The following sentence has been added to the discussion of long-term monitoring on page 10: “Samples will be collected quarterly for the first year, semi-annually for the following two years, and annually thereafter.”

12. Page 9, Alt. G-2A, last ¶, right column – Please see Comment 7.

Response: Please see the Response to Comment #7.

13. Page 10, Alt. G-2A, ¶ 1, left column, first sentence – See Comment 9.

Response: Please see the Response to Comment #9. The suggested change has been made.

14. Page 10, Alt. G-2A, ¶ 1, left column – Please delete the second sentence. See Comment 11.

Response: Agreed; performance monitoring is discussed on page 9. Please see the Response to Comment No. 11 for changes to the long-term monitoring discussion on page 10. The description of performance and long-term monitoring for Alternative G-2A is consistent with the FS.

15. Page 10, Alt. G-2A, ¶ 1, left column – Please delete the last two sentences.

Response: The penultimate sentence has been deleted. However the last sentence referring to five-year reviews is required for all the alternatives due to uncertainty in reaching the manganese PRG.

16. Page 10, Alt. G-2A, ¶ 2, left column – Please delete the first sentence in this paragraph and insert it after, “RAO No.1 would be achieved immediately upon implementation of the interim LUCs...” at the beginning of the second paragraph in the right column..

Response: Disagree. The comment suggests moving text from the discussion of Alternative G-2A to the discussion of Alternative G-3.

However, for consistency with Alternatives G-2 and G-2A, the LUC/RAO No. 1 discussion for Alternatives G-3 and G-4 will be revised as follows: “Interim LUCs would be implemented as described in the Summary of Remedial Alternatives. RAO No. 1 would be achieved immediately upon implementation of the interim LUCs.”

17. Page 10, Alt. G-3, ¶ 2, left column, second sentence – See Comment 9.

Response: The suggested change has been made. Please see the Response to Comment #19 below.

18. Page 10, Alt. G-3, ¶ 2, left column, third sentence – See Comment 10.

Response: Please see the Response to Comment #10.

19. Page 10, Alt. G-3, ¶ 2, left column – For consistency, please delete the fourth sentence and replace with, “Sampling frequency for field parameters and COCs would be quarterly for the first year, semi-annual for the next two years and annual thereafter.”

Response: The description of the enhanced bioremediation monitoring and MNA long-term monitoring for Alternative G-3 has been clarified for consistency with the discussion in the FS. The second paragraph has been revised as follows:

“Enhanced bioremediation is expected to achieve RAO Nos. 2 and 3 in approximately 20 years, with EOS injections every 5 years. Existing monitoring wells would be used to monitor the progress and effectiveness of EOS injections. In the first year, samples would be collected quarterly and analyzed for field parameters and COCs. After the first year, samples would be collected and analyzed annually.

The natural attenuation components would be the same as for Alternative G-2. Groundwater samples would be collected from selected monitoring wells and analyzed for the target analytes and natural attenuation parameters. Sampling frequency would be quarterly for the first year, semi-annually for the next two years, and annually thereafter. Prior to the remedial design, a baseline groundwater sampling event would be conducted to establish baseline conditions and to assist in preparation of the long-term monitoring plan. Five-year reviews...”

20. Page 10, Alt. G-4, ¶ 2, right column – See Comment 9.

Response: Please see the Response to Comment #9. The suggested change has been made.

21. Page 12 – Please put “Figure 5” under the figure (the legend on the map is difficult to read).

Response: The following caption has been added below the figure: “Figure 5 – Extent of Groundwater Contamination.”

**NAVY RESPONSES TO MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION
(MASSDEP) COMMENTS DATED JUNE 13, 2012
DRAFT PROPOSED PLAN – BUILDING 82
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

The Navy's responses to the MassDEP comments on the Building 82 Draft Proposed Plan (dated May 2012) are presented below. The MassDEP's comments are presented first (in italics) followed by Navy's responses.

The PRAP appears to be consistent with the 11/8/11 draft. Two minor comments:

Comment 1, Page 9, Summary of Remedial Alternatives, Second Paragraph: *Text about construction dewatering plan approval should be clarified to indicate that a party intending to do construction work would be required to obtain approval from EPA and DEP (current text could be misread to indicate that EPA and DEP would be required to approve construction plans).*

Response: The referenced text has been revised as follows: "(2) require that EPA and MassDEP approval of construction dewatering plans be obtained prior to conducting..."

Comment 2, Table 1: *Based on the cleanup times listed in the "Achieving the cleanup objectives for VOCs" row, circles indicating average performance should be presented in the "Provides short-term protection" row for Alternative G-2 and Alternative G-3 to distinguish the performance of these alternatives from the performance of Alternative G-2A, which has a shorter cleanup time.*

Response: Agreed. Table 1 has been revised as suggested.