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NAS SOUTH WEYMOUTH
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LETTER AND ATTACHED U S NAVY RESPONSE TO REGULATORS COMMENTS ON THE
DRAFT 2015 SITE MANAGEMENT PLAN FORMER NAS WEYMOUTH MA
09/22/2015
RESOLUTION CONSULTANTS

September 22, 2015

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

Reference: CLEAN Contract No. N62470-11-D-8013
Contract Task Order (CTO) No. WE27

Subject: Response to Comments – Draft 2015 Site Management Plan
Former NAS South Weymouth, Massachusetts

Dear Mr. Helland:

Resolution Consultants is pleased to submit the following document: Response to Comments – Draft 2015 Site Management Plan – Annual Update #15 (SMP). On behalf of the Navy, this document is being provided to the recipients listed below. If you have any questions, or require additional information beyond what is provided in this document, please contact me at 978.905.2409.

Sincerely,



Michelle Snyder, CHMM
NAS South Weymouth Task Order Manager

Document Distribution:

Mr. Brian Helland, RPM (1 hard copy, 1 CD)
Mr. David Barney, CSO (1 hard copy, 1 CD)
Ms. Carol Keating, USEPA (2 hard copies, 2 CDs)
Mr. David Chaffin, MassDEP (1 hard copy, 1 CD)

NAVY'S RESPONSE TO
U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS DATED MAY 27, 2015 and
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION (MASSDEP)
COMMENTS DATED JUNE 5, 2015 FOR DRAFT SITE MANAGEMENT PLAN –
ANNUAL UPDATE #15, DATED MAY 27, 2015
FORMER NAVAL AIR STATION SOUTH WEYMOUTH,
WEYMOUTH, MASSACHUSETTS

EPA GENERAL COMMENT

1. Comment: The July 2014, "Second Five-Year Review Report (FYR) for the Former Naval Air Station, South Weymouth" (Former NAS-South Weymouth)) identifies and includes a discussion of AOC Hangar 1 (OU25). Specifically, Section 5.0 discusses the "non-Aquifer Protection District "(non-APD) portion of the site and Section 7.0 (which summarizes the history, investigations performed, and current activities underway at each of the active and completed IR Sites and CERCLA AOCs that are included in the FFA) includes the APD portion. As discussed below, because a remedy is in place for the non-APD portion, it underwent full evaluation in the FYR; because the APD portion was still under investigation "under the CERCLA remedial process", it did not.

As you are aware, AOC Hangar 1 was initially identified and investigated due to the presence of contamination in the floor drain system. Subsequent to the issuance of the NFA ROD in July 2010, PFCs were discovered in groundwater at the Hangar 1 site. PFCs (PFOS and PFOA) were detected in groundwater at concentrations exceeding EPA's Provisional Health Advisories (PHAs) in, and downgradient of, the Hangar 1 site.

While the PFC groundwater investigation originally evaluated the Hangar 1 site as a single entity, the site was subsequently divided into two parcels (i.e. APD and non-APD) to facilitate the purchase and sale of the former NAS-South Weymouth in 2011. An ESD restricting the use of groundwater for drinking water purposes was placed on the non-APD portion of the site so that the 22-acre parcel could be included in the sale. The APD parcel, which encompasses a medium yield aquifer, identified as a potentially-productive drinking water source, was retained by the Navy for CERCLA remedial investigation in accordance with the South Weymouth FFA.

Accordingly, since both the APD and non-APD portions of the AOC Hangar 1 site are being managed by the Navy under the CERCLA RI/FS and RD/RA process (as necessary), they should be identified as IR Program sites and included in the 2015 SMP.

Response: The 2015 SMP will be updated to include Hangar 1 as an IR Program site.

EPA PAGE-SPECIFIC COMMENTS

1. Comment: Page 11, Section 3.0 – Please add "AOC Hangar 1 (OU25)" to this section and provide a brief description and history of site activities.

Response: Section 3.0 and other applicable sections of the 2015 SMP will be updated accordingly to reflect incorporating AOC Hangar 1 (OU25) into the IR Program.

2. Comment: Page 18, Section 3.2.7, last ¶ – It seems more appropriate to move this paragraph prior to the preceding one since it ends by discussing activities that will be performed in 2015.

Response: Suggested revision will be completed.

- Comment: Page 29, Section 3.7.7, last ¶ – Please include a brief description of the mercury release and actions taken to immediately respond to risks to human health and the environment.

Response: The following text will be added to the end of Section 3.7.7:

“During the removal of stone and sediment from the North Trickling Filter in January 2015, a small amount of mercury (droplets) was discovered. A mercury response plan was drafted and implemented. Mercury droplets (< 1 tablespoon) were recovered using a mercury vacuum and containerized in an 8-ounce jar, and mercury-contaminated soil and filter media were removed and containerized in two drums. A specialty hazardous material subcontractor performed mercury decontamination activities of potentially impacted media. A confirmatory soil sample was collected for mercury analysis, which did not indicate elevated levels. Mercury-contaminated media was disposed at Veolia ES Technical Solutions, LLC in Port Washington, Wisconsin. No mercury-impacted media was found during removal of the stone and sediment associated with the South Trickling Filter.”

- Comment: Page 37, Section 3.10.5 – Please amend the second to last sentence to reflect the fact that EPA, MassDEP, and the Navy must approve any construction dewatering activities prior to excavation/construction activities.

Response: Suggested revision will be completed.

- Comment: Page 37, Section 3.10.5 – Please amend the last sentence to state that “The Final LUCIP will be issued in 2015.” The ROD for this Site was signed almost three years ago. If necessary, EPA is prepared to take action, in accordance with the FFA (if necessary), to ensure that this LUCIP is finalized prior to property transfer.

Response: Suggested revision will be completed.

- Comment: Figures – Please ensure that the figures are consistent in depicting historic or current site conditions (or both). It is misleading and confusing to show plume contours based on historical datasets for some figures and more recent sample data for others.

Response: Figure 3-9 will be revised to present the 2015 groundwater data only. Figure 3-10 currently presents the 2013 groundwater data, which is the most current comprehensive dataset for that site.

- Comment: Figures – Please include a separate figure for the Hangar 1 site (including both the APD and non-APD portions).

Response: Figure 3-11 will be added to the SMP and will depict both the APD and non-APD portions of the Hangar 1 site.

- Comment: Figure 1-1 – Please identify the Hangar 1 site (both APD and non-APD portions) on this map.

Response: Figure 1-1 will be revised to include the Hangar 1 site.

9. Comment: Figure 3-9 – Please remove “proposed” prior to “Pilot Study Area” (the pilot study injections were completed last year).

Response: Reference to the “proposed Pilot Study Area” will be removed from Figure 3-9.

10. Comment: Appendix A:

- IOA – Further discussion is warranted requiring the draft ROD submission date (and all dates subsequent thereto).
- Hangar 1 – Further discussion is warranted regarding the apparent nine-month lag time between issuance of the draft RI and draft FS/EECA (and all dates subsequent thereto).
- RIA 111 – Old Hangar 2 – Further discussion is warranted regarding the identified of this site as a RIA vs an AOC and why it will take until September 2016 to begin the supplemental field investigation.
- STP – Please update the schedule for issuance of the draft RACR (and all dates subsequent thereto).
- SRA – Please update the schedule for issuance of the Final Work Plan for PRB Remedial Action (and all dates subsequent thereto).
- Buildings 81, 82 and SRA – Please add finalization of the draft LUCIPs to the existing schedule of deliverables.
- FFTA LTM – Please amend the table to reflect development, submittal and implementation of an amended LTMP (based on recent PM discussions/agreements regarding an expanded monitoring program).

Response:

- IOA – The Draft ROD was submitted in June 2015. The IOA schedule will be revised.
- Hangar 1 –The proposed August 19, 2016 due date is for issuance of the Final Feasibility Study (or EE/CA), the timeline of which is similar to the preceding schedule for the RI WP. The Areas of Concern Milestones and Deliverable Schedules will be revised to present a date for issuance of the Draft Feasibility Study (or EE/CA), which will occur 90 days following submittal of the Draft RI report, as well as clearly identify the schedule for submitting the Draft Final Feasibility (or EE/CA) report.
- RIA 111 – Old Hangar 2 – The supplemental field investigation has been delayed until September 2016 due to lack of existing funding to complete the investigation. Once the field investigation has been conducted, Navy will evaluate if this site should be identified as an AOC.
- STP – The STP Schedule will be revised.
- SRA – The SRA Schedule will be revised.

- Buildings 81, 82 and SRA – Date for the Draft LUCIPs will be added to the existing schedule of deliverables.
 - FFTA LTM – The FFTA Long-Term Monitoring Milestone and Deliverable Schedules table will be revised to include proposed dates for development, submittal, and implementation of an LTMP Amendment for expanding the existing monitoring well network at the FFTA.
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MASSDEP COMMENTS:

1. Comment: Figure 1-1 – MassDEP recommends showing locations of IOA, Hangar 1, and Old Hangar 2.

Response: Suggested revision will be completed.

2. Comment: Figure 3-4 – MassDEP recommends that the legend be revised to identify the LUC Area.

Response: Suggested revision will be completed.

3. Comment: Figure 3-10 – Title should indicate Site 11, rather than Site 9?

Response: The title of Figure 3-10 will be revised to indicate Site 11.

4. Comment: Appendix, Areas of Concern Table – Please confirm the Navy plans to submit the draft RI report for the AOC Hangar 1 by November 23, 2015 after receiving RI Workplan approval by August 30, 2015.

Response: The Hangar 1 schedule will be revised, the RI Report will not be submitted in November 2015.