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EMAIL MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON THE DRAFT FOCUSED FEASIBILITY STUDY FOR SITE 7 FORMER
SEWAGE TREATMENT PLANT NAS SOUTH WEYMOUTH MA
07/02/2015
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Subject: Focused Feasibility Study Report for STP Site
Date: Thursday, July 02, 2015 2:23:36 PM

For Use In Intra-Agency Policy Deliberations

Comments on the *Focused Feasibility Study for Site 7, Former Sewage Treatment Plant*, received June 11, 2015:

1. Section 1.1: MassDEP cannot complete a review of this report until the *Remedial Action Completion Report*, which will summarize the results from the on-going remedial action, is submitted, reviewed, and approved; consequently, all comments provided here are preliminary and subject to revision.
2. Section 2.4: In addition to the potential contaminant sources identified here, the report should note that structural drawings indicate that a fuel oil UST once located in Building 87 is also a potential source of the PAHs released at the site. The Navy has not located records documenting an acceptable closeout.
3. Section 3.4: Because remaining site contamination may be attributable to a fuel oil release (refer to previous comment), indoor air is a potential medium of concern in the upland area. Accordingly, Remedial Alternatives 2 and 3 should include a site screening component (e.g., soil gas or groundwater sampling) to assess this potential pathway, or include restrictions that would require on-site buildings be designed and constructed to prevent vapor intrusion.
4. Section 3.5, Second and Fourth Paragraphs: The cited quantities of soil appear to be inconsistent with the quantities listed in Table 2.
5. Section 3.5, Third Paragraph: Sample "SB-A15" should be corrected Sample "SB-15A".
6. Section 5.1.2, First Bullet: Because construction in the upland area would breach and alter the existing ground surface, the use of the existing soil cover as a barrier to prevent exposure to deeper impacted soil appears to be inconsistent with the assumed future use of the upland portion of the site property (commercial). The report should be clarified to describe the conditions under which soil in the upland area between 0 and 9 feet below grade could be disturbed or altered to allow construction and occupation.
7. Section 5.1.2, Second Bullet: The report should identify the party(ies) who would be responsible for developing, approving, and overseeing implementation of the soil management plan.
8. Section 5.2: To ensure that the LUCs can be enforced by MassDEP, the restrictions should also be imposed using the recently developed CERCLA Notice of Activity Use Limitation form.

9. Section 6.0: After finalization, the *Remedial Action Completion Report* should also be listed here.
10. Figure 3 includes the results from many samples collected in areas where subsequent removals were conducted. The figure should be updated to reflect current conditions after the on-going removal action and associated *Remedial Action Completion Report* are completed.
11. Figure 4 should distinguish the area where access to soil below 2 feet will be restricted from the area where access to soil below 9 feet will be restricted.
12. Appendix B: Tables B-2a and B-3a should identify the state risk thresholds (cited in Appendix C) as “TBCs”.
13. Appendix B: 310 CMR 40.0111(8) should be cited as an ARAR that applies to implementation of land use controls for Alternative 2.

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