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NAS SOUTH WEYMOUTH
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U S NAVY RESPONSE TO THE U S EPA REGION I COMMENTS DATED JUNE 2015
TRANSMITTED 9 SEPTEMBER 2015 AND 6 OCTOBER 2015 FOR THE DRAFT VERSION 2
FOCUSED FEASIBILITY STUDY SITE 7 FORMER SEWAGE TREATMENT PLANT FORMER
NAS SOUTH WEYMOUTH MA
01/04/2016
RESOLUTION CONSULTANTS

JANUARY 4, 2016 RESPONSE TO UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS DATED JUNE 2015 (TRANSMITTED SEPTEMBER 9, 2015) AND OCTOBER 6, 2015 FOR THE DRAFT VERSION 2 FOCUSED FEASIBILITY STUDY; SITE 7, FORMER SEWAGE TREATMENT PLANT DATED JULY 21, 2015 FORMER NAVAL AIR STATION SOUTH WEYMOUTH WEYMOUTH, MASSACHUSETTS

The Navy has prepared this in response to the United States Environmental Protection Agency (EPA) follow up comments dated September 9, 2015. Please note that the EPA accepted all responses with the exception of Comment 6. This comment and the Navy's response are provided below.

The Navy will also make the following revisions.

- The Navy will revised the title of Alternative 2 to be Land Use Controls (LUCs) and Long Term Monitoring (LTM) in agreement with the Massachusetts Department of Environmental Protections (MassDEP) comment on the draft Proposed Plan.

Note that where the comment response provides revised text, original text is shown in italics, text additions are shown in bold italics, and deleted text is shown as strikethrough.

SEPTEMBER GENERAL COMMENTS:

1. **Comment:** Page 7, Section 1.5, Remedial Action, ¶ 5 – This discussion should be expanded to more fully describe the results of the post-excavation, confirmatory sampling performed and the decision to conduct a supplemental PDI. Specifically, please amend the first sentence to read, “Based on results of the PDI, a remedial design was completed and the RA was implemented in 2009 to address COCs in surface soil and sediment in accordance with the 2008 ROD.” In addition, please insert the following text at the end of the paragraph “Confirmatory sampling results revealed COC contamination beyond the planned limits of excavation and a supplemental PDI effort was recommended to address data gaps and further delineate the extent of soil contamination.”

Response: The Navy will revise the document to reflect this change as shown below.

Based on results of the PDI, a remedial design was completed and the RA was implemented in 2009 to address COCs in surface soil and sediment in accordance with the 2008 ROD. The PDI scope of work was presented in the Final Remedial Action Work Plan for Soil Excavation at Site 7, Former Sewage Treatment Plant Location, (TtEC 2009). ~~The RA was conducted to reduce the levels of the contaminants of concern in surface soil and sediment to below the RGs per the selected remedy identified in the ROD (Navy 2008). Following removal of the impacted material, confirmatory samples were collected to document the remaining levels of the contaminants of concern. Confirmatory sampling results revealed COC contamination beyond the planned limits of excavation and a supplemental PDI effort was recommended to address data gaps and further delineate the extent of soil contamination. The work completed during the 2009 mobilization was summarized in the Interim Remedial Action Completion Report for Soil Excavation at Site 7, Former Sewage Treatment Plant Location (TtEC 2011).~~

Additional EPA Comment: Response unacceptable. EPA requested that the Interim RACR be retracted because it was premature and not supported by existing data. The work

completed during the 2009 mobilization should be summarized in the Final RACR for the STP. Please delete the last sentence, as proposed.

Additional Navy Response: The Navy will delete the last sentence.

OCTOBER COMMENTS:

1. **Comment:** Page 12, Section 2.2 – The current discussion is confusing as written. Please amend the two paragraphs to read, “The 2014-2015 remedial action successfully removed contaminated surface soil and sediments to below PRGs. The following COCs remain above PRGs, however, in subsurface soils at depths below 11 feet below ground surface (bgs) in the eastern upland area in the vicinity of former STP structures (as shown on Figure 3) and in the wetland area at depths below 2 feet bgs:” (and list same COCs);

Response: The requested change will be made.

2. **Comment:** Page 27, last paragraph – The last two sentences are confusing and should be deleted. Specifically, since the proposed remedy prohibits residential development of the property, any other development (other than residential) that is proposed at depths greater than 9 feet bgs requires that soils be managed in accordance with a soil management plan (to ensure that soils from these depths is managed properly and that future construction work in these areas is completed by property trained workers). In addition, these requirements are clearly spelled out in the bullets on the preceding page.

Response: The requested change will be made.

3. **Comment:** Page 33, second paragraph – The second sentence should be amended to read, “This alternative would meet the RAO by restricting residential redevelopment of the site and managing access to impacted subsurface soils below 9 feet bgs.”

Response: The requested change will be made.