



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Rec'd 8/18/98 DCK

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Governor

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Ms. C.D. Kincaid, REM
Branch Head
BRAC Compliance Management

David Austin, LSP
Foster Wheeler
Boston, MA 02108

August 12, 1998

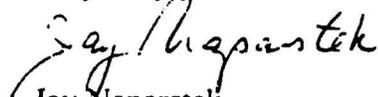
Dear Ms. Kincaid & Mr. Austin:

The Department has received the Navy's letter dated July 2, 1998 regarding the Department's conditional approval of the Release Abatement Measure (RAM) Plan for Ordnance Debris. Several issues raised in the Departments conditional approval have not been adequately addressed in the Navy's letter. Attached to this letter is a summary of those issues. We recommend follow up discussions with you to resolve the remaining issues.

The Department acknowledges that a radiological survey of the scrap metal in the holding area on the island has been completed as required, and radiological levels were within normal background levels. Based on these results, the Department verbally approved removal of this scrap metal on August 11, 1998 for off site disposal.

We appreciate your cooperation to date. To schedule a meeting to discuss the remaining issues or, if in the interim you have any questions regarding this letter please contact Anne Maiewicz, Federal Facility Section Chief at 617 292 5659.

Very truly yours,


Jay Naparstek
Assistant Deputy Director

Kincaid-Austin/ Naparstek
Attachment to August 12, 1998 letter

Comment #1

The Department requires performance of an off shore survey for ordnance.

Comment #6

The ODR plan activities do not include the cliffs because they are inaccessible. You should however, visually inspect the cliffs by boat or along the shoreline for exposed ordnance, document the results and remove accessible ordnance.

Comment #7

The Department recommends a geophysical survey in the former target area and along clearly identified paths and other areas frequented by USF&W Service personnel and by trespassers. Please pay particular attention to areas containing significant surgical UXO and debris and to areas where craterers show that full charge ordnance exploded.

Comment #8

The Department does not agree with the statement on page 6 in Paragraph 8 that "NO UXO clearance will be conducted in the areas of freshwater ponds or beaches". The Department requires inspection of the freshwater ponds and beaches for UXO and debris, with particular attention paid to Ben's Pond. You may limit these inspection to beach areas around the ponds at shallow water depth. The nature of these ponds make them unlikely areas for swimming and other deeper water activities. Areas along the perimeter, the beach and in the ponds where visual ordnance are seen should be removed. Provisions should be made for removal ordnance if found where additional work occurs in the ponds during later phases of work.

Comment #9

The Department expects Activity Use Limitations (AULs) to be placed on the Island by the Navy ensuring that the potential future exposures resulting from land use will remain consistent with the exposures considered with a Wildlife Preserve. In addition, the Department expects to review the full operation and management plan addressing potential ordnance which may surface in the future at the Island. This plan should include the method and frequency of inspections, who will conduct the inspections, notification procedures for ordnance found in the future, and the process to implement removal of such ordnance.