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COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
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LAUREN A. LISS
Commissioner

November 10, 1999

Ms. Dawn C. Kincaid
Head, BRAC Compliance Management
Department of the Navy
10 Industrial Highway
Lester, Pa. 19113-2090

Dear Ms. Kincaid:

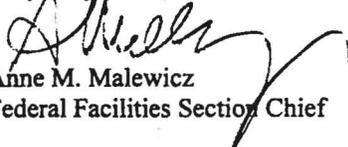
The Department has reviewed the Release Abatement Status Report on Nomans Land Island which was submitted to the Department by David Barney from your Environmental Caretaker Site Office, South Weymouth. After review of this status report, the Department would like to provide clarification that there are still issues outstanding with reference to unexploded ordnance at this site as noted as conditions to the approval of the Ram Plan. These issues are the following:

- 1) The Department requires performance of an offshore survey for ordnance to protect US. Fish and Wildlife personnel and others who anchor boats near the beach. The Department recommends that you survey the shoreline visually for UXO from the low tide mark out to a minimum depth of 10 feet. The Department feels that it would be technically feasible to do so since offshore UXO work in the South Pacific is being performed. We would like to resolve this outstanding technical issue with you.
- 2) The Department recommends a geophysical survey in the former target area and along clearly identified paths and other areas frequented by personnel and by others. Please pay particular attention to areas containing significant surface UXO and debris and to areas where craters show that full charge ordnance exploded. It is the Department's understanding that it is technically feasible to perform geophysical work in these areas but this has not been done to date.
- 3) Please explain how the cliffs were inspected for ordnance and what plan is in place to address UXO.
- 4) Please provide clarification as to the work conducted in the areas of freshwater ponds or beaches for UXO removal. The Department requires inspection of these freshwater ponds and beaches for UXO and debris with particular attention paid to Ben's Pond.
- 5) The Department requests clarification as to the use of Activity Use Limitations to be placed on the Island by the Navy ensuring that the potential future exposures resulting for land use will remain consistent with anticipated exposures. The Department has received two different responses from the Navy's on this issue.
- 6) The Department desires 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. The Department, as of this date has not been provided with a copy of a operation and management plan. Please send a copy of this plan to my attention.

In addition, it is the Department's understanding that there is a Comprehensive Conservation Plan for the National Wildlife Refuges in Massachusetts underway. Public forums on the remediation of Nomans Land Island has shown the public's interest in the restoration of the Island to meet the needs for safe public access and wildlife protection. We anticipate the management and remediation of the Island is feasible to a level that is protective to both the current public access and future authorized access once the Navy has fulfilled its requirement to remediate the island. It would be beneficial for the Navy to review the Comprehensive Conservation Plan for National Wildlife Refuges in Massachusetts.

Thank you for the work the Navy has performed providing surface removal of UXO at Nomans Land Island. However we still have issues remaining and we look forward to working with you in completing remediation. If you should have any questions regarding this letter, please contact me at 617 292-5659.

Very truly yours,



Anne M. Malewicz
Federal Facilities Section Chief