

**RECORD OF DECISION**

**South Post Impact Area and AOC 41 Groundwater and AOCs 25, 26, & 27**

---

**RECORD OF DECISION SUMMARY  
SOUTH POST IMPACT AREA AND  
AREA OF CONTAMINATION 41 GROUNDWATER AND  
AREAS OF CONTAMINATION 25, 26, AND 27  
FORT DEVENS, MASSACHUSETTS**

**APPENDIX D**

**RESPONSIVENESS SUMMARY**

**This page intentionally left blank**

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. <b>Originating Organization of Document : U.S. Army Environmental Center</b>					
2. <b>Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27</b>					
3. <b>Date Comments Required: Response document</b>					
4. <b>Reviewed by:</b>	5. <b>Page</b>	6. <b>Line</b>	7. <b>Section</b>	8. <b>Comment</b>	9. <b>Comment Response</b>
PROPOSED PLAN for SPIA Groundwater and AOCs 25, 26, and 27 - January 30, 1996					
Nashua River Watershed Association, Feb. 21, 1996	7			Groundwater Investigations Results, p.7 - What is the Army's degree of confidence for its stated conclusion that "...contamination found in the southern SPIA wells are not impacting the Nashua River." Even if performed over four consecutive years, once annual sampling at one site (Well D-1) for one set of contaminants ("explosive-related organics") seems inadequate. Were other contaminants sampled for during this four year period? If so, what do their results show?	Sampling was done in accordance with our approved QA/QC plan. D-1 has been sampled for the complete list of TAL, VOCs, semivolatiles, PCBs, explosives, and semi-volatiles.
Nashua River Watershed Association, Feb. 21, 1996	8 & 9			Groundwater Monitoring and Ecological Management Plans, pp. 8 & 9. The Army's decision to develop and implement such plans is welcome re-assurance. NRWA requests that the monitoring reports mandated by these plans be submitted as well to local Boards of Health and Conservation Commissions. In addition, these plans should prescribe mitigation measures to be taken in the event that EPA thresholds for any of the contaminants sampled are exceeded.	The Army, USEPA-New England, and MADEP will develop the details of the Integrated Natural Resources Management Plan. This plan will be developed within 6 months of ROD signature. This issue will be addressed in the plan.
Nashua River Watershed Association, Feb. 21, 1996	10			EOD Range Risk Assessment, p. 10—This plan should adequately describe the worst case scenario projected. The plan assumes that continuing habitat disturbance will keep animals and plants off the range and for this reason continuing contaminant accedences will be ecologically insignificant because potential receptors will not be present. However, periods of inactivity will very likely bring about the re-establishment of animals and plants long before heavy-metal concentrations fall below EPA's thresholds.	The Army, USEPA-New England, and MADEP will develop the details of the Integrated Natural Resources Management Plan. This plan will be developed within 6 months of ROD signature. This issue will be addressed in the plan
Nashua River Watershed Association, Feb. 21, 1996	12			Zulu Ranges Risk Assessment, p. 12—What laboratory test was performed (And what were its results?) that showed water samples were not toxic to aquatic invertebrates and fish despite lead accedences? Again, if animals and plants return to disturbed habitat during these times of disuse, excessive concentrations of heavy metals will likely prove ecologically significant.	The laboratory tests performed were surface water chronic toxicity tests with invertebrates and fathead minnows. tests were performed according to EPA guidance. Results are provided in Appendix K to Volume V of the Ft. Devens Functional Area IRI Report (August 1994). Water for testing was collected from three sites in the north Zulu wetland and one site in the south Zulu wetland. No effects on survival and fecundity were observed. These results suggest that indigenous biota would not be adversely affected by the levels of contamination in wetlands associated with the Zulu site.  The Army, USEPA-New England, and MADEP will develop the details of the Integrated Natural Resources Management Plan. This plan will be developed within 6 months of ROD signature. This issue will be addressed in the plan

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center								
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27								
3. Date Comments Required: Response document								
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response			
Nashua River Watershed Association, Feb. 21, 1996	13			Hotel Range Risk Assessment, p. 13—This section's phrasing suggests that water samples were not taken from Cranberry Pond. If not, why not? How can the Army be sufficiently confident that samples from Zulu Range are comparable to any that might be taken from Cranberry Pond? Once again, there is concern about the ecological consequences of the settling of disturbed habitat and the reappearance of animals and plants.	Six samples were collected in the RI and 3 in the SI at Cranberry Pond. As stated in the ecological risk assessment for Hotel Range, the lack of toxicity of lead in nearby Zulu surface water samples suggests that the lead is in a chemical form which is not bioavailable and does not pose a threat to aquatic life.  The Army, USEPA-New England, and MADEP will develop the details of the Integrated Natural Resources Management Plan. This plan will be developed within 6 months of ROD signature. This issue will be addressed in the plan.			
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				AOC 25 (Explosive Ordnance Disposal Range) Elevated levels of metals were reported in the RI (Vol. II pg. 5-1, Line 45) at sampling location 255-92-06X. This portion of AOC #25 is an area designated for emergency disposal of waste ordnance. The proposed Plan (pg. 10) discusses conducting an additional human health risk assessment if the Army were to relinquish control of AOC #25 and release the land for other purposes. This type of language should also be included for ecological receptors and a new ecological risk assessment when military activities (e.g., emergency disposal of waste ordnance) cease at the site. Current contaminant concentrations at AOC #25 may not warrant immediate removal actions, but subsequent military activities since the RI investigation may cause additional contamination requiring reexamination.	The following text has been added to the ROD "Should the Army close and/or transfer this property, an Environmental Baseline Survey (EBS) will be conducted. The EBS will be provided to the USEPA-New England and MADEP for comment."  The Army, USEPA-New England, and MADEP will develop the details of the Integrated Natural Resources Management Plan. This plan will be developed within 6 months of ROD signature. This issue will be addressed in the plan.			
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				AOC 25 (Explosive Ordnance Disposal Range) In the Nature and Extent section of the RI (Vol. II, page. 5-33, Table 5-5), copper ( 29.7 µg/l) and lead (18.8 µg/l) at AOC #25 exceed the acute and chronic freshwater Ambient Water Quality Criteria, respectively. These elevated concentrations were not discussed in the RI ecological risk assessment (ERA). The ERA summary in the Proposed Plan (pg. 10) also does not mention these contaminants	No surface water resources are located within AOC 25. A natural spring and its associated stream are located west of the site across Firebreak Road, which flows into Slate Rock Brook. This spring was very shallow and the sample collected from it was turbid, explaining the elevated metals. There is a groundwater divide between the EOD disposal area and the spring so that the disposal area cannot possible affect the water quality at the spring. The ecological risks of contaminants in Slate Rock Brook were evaluated in the assessment of the SPIA provided in Section 9 of Volume I of the Ft. Devens Functional Area I RI Report.			

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center								
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27								
3. Date Comments Required: Response document								
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response			
U.S. DOI, Fish and Wildlife Service, Feb. 29, 19960				AOC 25 (Explosive Ordnance Disposal Range) In the RI (Vol. II, pg. 9-1, Line 44), we found an inconsistency in the discussion of potential polycyclic aromatic hydrocarbon (PAH) contamination in surface soils. The ERA stated that since PAHs were not detected in subsurface soils, the same organic analytical results would be expected in surface soils, which were not analyzed for PAHs. This logic in the ERA for soil PAHs did not make sense. We could accept the opposite (i.e., if the surface was uncontaminated the subsurface would likely be uncontaminated), but the supposition that the surface soils are clean because the subsurface soils were uncontaminated is illogical. Was this issue ever resolved? To us, this is an inconsistency that should have been addressed before a Proposed Plan of No Action was issued. Sampling to determine potential PAH surface soil contamination appears warranted.	The presumed lack of PAH contamination in surface soils was based on the fact that TPHCs were found at approximately the same concentration in both surface soil and subsurface soil, yet PAHs (a component of petroleum hydrocarbons) were not detected in subsurface samples.			
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				AOC 26 (Zulu Ranges) We pointed out that elevated contaminant concentrations were omitted from the RI (Vol III, pg. 5-1, Line 12) discussion if they could not be related to the site. If an environmental contaminant was found at concentrations likely to cause a biological effect, the RI should have mentioned the elevated level and its consequences even if the contaminant could not be directly attributable to military training or demolition activity	The concentrations of these chemicals was equivalent to the local background concentrations. However, the Army, USEPA-New England, and MADEP will develop the details of the Integrated Natural Resources Management Plan. DOI concerns of data gaps will be discussed during this plans development. This plan will be developed within 6 months of ROD signature. This issue will be addressed in the plan.			
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				AOC 26 (Zulu Ranges) The RI ERA (Vol. III, pg. 9-23) recommended additional toxicity tests, chemical analysis of sediment pore water, and/or other ecological investigations in the Zulu wetlands. The Proposed Plan (pg 12), however, only mentions that water samples were not toxic to aquatic invertebrates and fish.	The Army, USEPA-New England, and MADEP will develop the details of the Integrated Natural Resources Management Plan. This plan will be developed within 6 months of ROD signature. This issue will be addressed in the plan.			
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				AOC 26 (Zulu Ranges) The USFWS concurred with the Army that remediation was not necessary at AOC #26 if explosive and ordnance training were to continue (Vol. III, pg 5-2, Line 32). We qualified this statement in our letter with the condition that new contamination from ongoing military activities may require a reassessment if the South Post closes and new land-uses may be implemented. Specifically, lead and explosive contaminants should be reassessed following closure. We also concurred with the RI findings that further investigation is warranted to evaluate risk to ecological receptors using the Zulu wetlands (Vol. III, pg. 9-23, Line 11).	No response required.			
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				AOC 27 (Hotel Range) Surface soil contamination at AOC #27 requires further evaluation. In the review of the RI (see USFWS comments for Vol. IV, pg. 5-1 and 9-8), it was unclear to us how the subsurface soil boring data related to potential surficial contamination. Although, we recommended limited surface soil sampling to resolve the issue, it apparently was never conducted.	Subsurface soils were collected in the RI, and in the SI 10 soil samples were collected at depths of 0 to 20 feet. Both the SI and RI data were evaluated in the ecological risk assessment, and no COPCs were identified. In addition, the entire former disposal area has been deeply buried as a result of profound remodeling. All surface soils at the AOC are recently bulldozed subsoils or originate from outside the former disposal area. Therefore, additional soil sampling does not appear to be warranted.			

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center					
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27					
3. Date Comments Required: Response document					
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				AOC 27 (Hotel Range) The ERA focused on potential risks to aquatic invertebrates in Cranberry Pond (Vol. IV, pg. 9-14, Line 17). Although lead was detected in surface water, the ERA did not include a discussion of possible risks to the warm water fish community in the pond.	As discussed in section 9 of Volume IV of the Fort Devens Functional Area I RI Report, page 9-12, line 15, the assessment of risks to aquatic invertebrates was done using toxicity reference values that address all forms of aquatic life, including fish and aquatic plants.
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				AOC 27 (Hotel Range) The RI (Vol. IV, pg. 9-16, Line 5) suggested that toxicity tests conducted for AOC #26 may also be applicable to AOC #27. The Proposed Plan (pg. 13) also attempts to make this connection. As we noted, site-specific conditions and variations in concentrations of inorganic and other contaminants between the sites may make this an invalid hypothesis. We agreed with a conclusion in the ERA (Vol. IV, pg. 9-19, Line 20) that the benthic community may be at risk from AOC #27 contaminants. To resolve this issue, toxicity tests for AOC #27 should be considered in the proposed Environmental Management Monitoring Plan.	The Army, USEPA-New England, and MADEP will develop the details of the Integrated Natural Resources Management Plan. This plan will be developed within 6 months of ROD signature. This issue will be addressed in the plan.
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				AOC 27 (Hotel Range) The RI ERA (Vol. IV, pg. 9-18, Line 9) recommended additional sediment sampling to define the nature and extent of contamination in Cranberry Pond. The Proposed Plan (pg. 12) mentions that only one sediment sample showed elevated metals and dismisses the need for additional sampling. We concur with the recommendations in the ERA, and restate our opinion that additional sediment sampling is warranted in Cranberry Pond.	The Army, USEPA-New England, and MADEP will develop the details of the Integrated Natural Resources Management Plan. This plan will be developed within 6 months of ROD signature. This issue will be addressed in the plan.
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				AOC 27 (Hotel Range) In the Proposed Plan (pages 10,12, & 13), the summaries of Ecological Risk Assessments for all three AOCs state that the risk at these sites would not be ecologically significant due to the disturbed nature of the habitat. These statements attempt to devalue the habitat provided by the SPIA to fish and wildlife resources. Although military activities are disruptive and the habitat may be disturbed at certain times of the year, training activities do not occur continuously. Many species will utilize the habitats associated with the AOCs in other seasons when training is sporadic. Some species are even more tolerant of military training and may continue to use the areas throughout the year adjusting their activity patterns to periods of the day (i.e., dawn and dusk) or night when training may be less intensive or frequent.	No response required.
U.S. DOI, Fish and Wildlife Service, Feb. 29, 1996				We reiterate our strong beliefs that the issues and concerns discussed above (and the other issues we mentioned in our April 27, 1995 letter) should have been addressed before a No Action plan were adopted for the SPIA. While the USFWS has no desire to delay the cleanup/remedial process at Fort Devens, we cannot support the Proposed Plan in its present form. If the recommendations and data gaps identified in this letter are completely addressed within the Ecological Management Monitoring Plan, and it is made clear to the Army the remedial actions may be required in the future, prior to any land transfer, we could join EPA in supporting the Army's Proposed Plan of No Action. We suggest that language be added to the ROD that requires the Army to accomplish the ERA recommendations and investigate or resolve all RI data gaps. Without this language, we believe that a No Action ROD could be used later in the process to refute the need for additional assessment, sampling, or remedial action.	Additional work as recommended by DOI will be discussed during development of the Integrated Natural Resources Management Plan.

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

<b>1. Originating Organization of Document : U.S. Army Environmental Center</b>								
<b>2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27</b>								
<b>3. Date Comments Required: Response document</b>								
<b>4. Reviewed by:</b>	<b>5. Page</b>	<b>6. Line</b>	<b>7. Section</b>	<b>8. Comment</b>				<b>9. Comment Response</b>
MADEP Feb. 29, 1996	6		Par. 1	The proposed plan should note that the ROD does not affect assessment or remedial activities on the other South Post sites. These sites include AOC 41 (Beer Can Landfill), SA 6 (household Landfill), SA 12 (Range Control Landfill), SA (Popping Furnace), and RCRA closure of SA 28.				The following text was added to the ROD Declaration statement and Executive Summaries "This ROD does not affect assessment or remedial activities on areas not specifically mentioned herein."
MADEP Feb. 29, 1996	7		Par. 5	The MADEP recommends that the proposed plan note the location of the groundwater divide. Additionally, the plan should note that an explosive related organic, dinitrobenzene is found in monitoring wells SPM-93-8X, SPM-93-10X, and SPM-93-16X which are north of the New Cranberry Pond Groundwater divide.				The purpose of the fact sheet and proposed plan is to summarize the information on each AOC. For detailed information, the RI Report should be consulted. Even though explosives and other contaminants were found in the referenced wells, no exposure exists at these points based on the current and future use (Army training activities). The ecological concerns will be addressed in the Integrated Natural Resources Management Plan which will be developed post-ROD.
MADEP Feb. 29, 1996	9		Par. 5	Please note that explosives were analyzed in groundwater samples collected from EOD-1 and metals were present in groundwater samples collected from EOD-4.				The purpose of the fact sheet and proposed plan is to summarize the information on each AOC. For detailed information, the RI Report should be consulted. Even though explosives and other contaminants were found in the referenced wells, no exposure exists at these points based on the current and future use (Army training activities). The ecological concerns will be addressed in the Integrated Natural Resources Management Plan which will be developed post-ROD.
MADEP Feb. 29, 1996	10		Par. 7	The MADEP recommends that the plan note the presence of explosives and metals in AOC 26 groundwater.				The purpose of the fact sheet and proposed plan is to summarize the information on each AOC. For detailed information, the RI Report should be consulted. Even though explosives and other contaminants were found in the referenced wells, no exposure exists at these points based on the current and future use (Army training activities). The ecological concerns will be addressed in the Integrated Natural Resources Management Plan which will be developed post-ROD.
MADEP Feb. 29, 1996	12		Par. 4	Although the proposed plan notes the presence of metal contamination in one Cranberry Pond sediment sample, the analytical data indicates numerous exceedences of background and sediment criteria in other Cranberry Pond sediment samples. The MADEP recommends that the Army review the available sediment data and include language in the proposed plan noting the exceedences. Additionally the proposed plan should note the presence of explosives in groundwater on the site.				The purpose of the fact sheet and proposed plan is to summarize the information on each AOC. For detailed information, the RI Report should be consulted. Even though explosives and other contaminants were found in the referenced wells, no exposure exists at these points based on the current and future use (Army training activities). The ecological concerns will be addressed in the Integrated Natural Resources Management Plan which will be developed post-ROD.

# RECORD OF DECISION

## South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27

1. Originating Organization of Document : U.S. Army Environmental Center								
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27								
3. Date Comments Required: Response document								
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response			
FACT SHEET SPIA Groundwater and AOC 25, 26, and 27 - January 30, 1996								
MADEP Feb. 29, 1996	1			Please note that the "no-action" ROD does not preclude future assessment and remediation activity should implementation of the monitoring plan detect any increase in contamination or threat to human health or the environment.	The Army understands and agrees with MADEP that any future actions will need to be assessed to determine their potential impact and the need for additional investigations.			
MADEP Feb. 29, 1996	2			The MADEP recommends that the fact sheet state that the ROD does not affect assessment or remedial activities on the other South Post sites. These sites include AOC 41 (Beer Can Landfill), SA 6 (Household Landfill), SA 12 (Range Control Landfill), SA 42 (Popping Furnace) and RCRA closure of SA 28.	The following text was added to the ROD Declaration statement and Executive Summaries "This ROD does not affect assessment or remedial activities on areas not specifically mentioned herein."			
MADEP Feb. 29, 1996	2			The MADEP recommends that this section be corrected to note that dinitrobenzene was found in groundwater in wells north of the groundwater divide. This explosive related organic was found in monitoring wells SPM-93-8X, SPM-93-10X, SPM-93-16.  Other instances of contamination that should be discussed in this section include:  AOC 25: Heavy metal groundwater contamination in EOD-4 and 25M-93-10X, explosive groundwater contamination in EOD-1 and surficial soil contamination in 25S-92-05X and 25S-92-06X.  AOC 26: Explosive groundwater contamination in 26M-92-02X, 26M-92-03X, 26M92-04X.  AOC 27: All Cranberry Pond sediment samples exhibit heavy metals contamination in excess of background and ecological criteria. Additionally, please note that both explosives and dissolved heavy metals were found in AOC 27 groundwater.	The purpose of the fact sheet and proposed plan is to summarize the information on each AOC. For detailed information, the RI Report should be consulted. Even though explosives and other contaminants were found in the referenced wells, no exposure exists at these points based on the current and future use (Army training activities). The ecological concerns will be addressed in the Integrated Natural Resources Management Plan which will be developed post-ROD.			
MADEP Feb. 29, 1996	2			The MADEP recommends that the fact sheet note that the risks posed to human health are within the EPA's standard for acceptable use based on current use.	The Army agrees that the risks are within USEPA standards based on current and future use. The Army has included statement to that effect in the ROD.			
MADEP Feb. 29, 1996	3			Although the MADEP acknowledges that there is no threat to human health associated with SPIA groundwater based on risk assessments and current use, we recommend that the fact sheet note that the risk assessments did not consider groundwater as a contaminant pathway.	The Army did address groundwater as a contaminant pathway in the RI.			
DRAFT ROD for SPIA Groundwater and AOC 25, 26, and 27 - February 14, 1996								
USAEC Public Affairs Office	7	4		Explain what is meant by local background samples.	Added the following text after first mention of local background samples "Background samples are those collected in a similar medium (i.e., water, soil, sediment) that are not believed to be contaminated"			
USAEC Public Affairs Office	7	21		More space is needed between "L" and the superscript "2."	Changed text to "screening value <sup>1</sup> (50 µg/L)"			
USAEC Public Affairs Office	7	23		More space is needed between "L" and the superscript "3."	Changed text to "screening value <sup>3</sup> (2 µg/L)."			
USAEC Public Affairs Office	7	35		More space is needed between "L" and the superscript "4."	Changed text to "screening value <sup>4</sup> (50 µg/L)"			

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center					
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27					
3. Date Comments Required: Response document					
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response
EPA-New England (no date)	Gen.			Please delete "deemed acceptable by USEPA-New England" and change to read "deemed acceptable" in all section of the ROD that have this statement.	Global search done to remove "deemed acceptable by USEPA-New England" and replace with "deemed acceptable."
EPA-New England (no date)	ES-1	20		Please change this line; the sentence is duplicative.	Changed sentence to read "The SPIA is approximately.."
EPA-New England (no date)	ES-1	23		Please add that this will be the use for the foreseeable future also.	Changes text to read "SPIA is and will be for the foreseeable future an active.."
EPA-New England (no date)	ES-2	4		Please add at the end of the sentence: "within 6 months of ROD signature."	Text was added.
EPA-New England (no date)	ES-2	18		Please add the additional parameters that this will be sampled for (i.e., MCLs/MMCLs).	The following text was added to the end of this bullet "Massachusetts and Federal drinking water requirements (MMCLs/MCLs)."
EPA-New England (no date)	ES-2	20		Please make the development of this plan a separate paragraph. Please add "the details of this plan will be developed jointly by the Army, EPA New England, US Fish and Wildlife Service, and MADEP within 6 months of ROD signature."	Bullet was not changed. Text was separated from a subsequent paragraph and made a stand alone paragraph that focuses on this plan.
EPA-New England (no date)	ES-2	24		Please add to the end of the sentence: "annually."	Text was added.
EPA-New England (no date)	ES-2	36		Please add a sentence describing the Army's responsibilities if the land use changes as a result of closure and/or transfer.	The following text has been added to the ROD "Should the Army close and/or transfer this property, an Environmental Baseline Survey (EBS) will be conducted. The EBS will be provided to the USEPA-New England and MADEP for comment."
EPA-New England (no date)	ES-2	38		Please add to the end of this sentence: "as required under CERCLA."	Text was added.
EPA-New England (no date)	3		Par. 3	Please reference the fact that the SPIA was retained and will continue to be used as a training range.	The following text was added " However, the SPIA will be retained by the Army for continued use as a training range."
EPA-New England (no date)	4	9		The TRC was established in March, 1991.	The text was modified to read correctly.
EPA-New England (no date)	5	20		Please specify what the "future activities" are (i.e., military training).	The text was modified to read "...future military training activities.."
EPA-New England (no date)	14	18		1E-6 is 1/1,000,000 not 1/100,000. Please change.	The text was modified to read correctly.

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center					
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27					
3. Date Comments Required: Response document					
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response
EPA-New England (no date)	16	12		1.2E-1 is not within or below the EPA's risk range. Is this a typo? Please clarify.	Number was entered incorrectly, the appropriate value "1.7 x 10 <sup>-1</sup> " has been entered.
EPA-New England (no date)	17	35		How does the Army Range Control restrict access? Are there security patrols, etc.? Please expand this section.	Text adequately describes restrictions.
EPA-New England (no date)	18	11	VIII	Please add at the end of the sentence: "within 6 months of ROD signature."	The desired text has been added.
EPA-New England (no date)	18	22		Under this bullet, I would suggest not listing specific wells; this plan still needs to be negotiated between Army, EPA, and MADEP.	Specific reference has been removed.
EPA-New England (no date)	18	29		Please add that the Plan will be developed within 6 months of the ROD.	The following text was added to this paragraph "The plan will be developed within 6 months of ROD signature."
EPA-New England (no date)	18	37		Please make this a separate paragraph and explain that this plan will be jointly developed by the Army, EPA, US Fish and Wildlife Service, and MADEP within six months of ROD signature.	The desired text was added.
EPA-New England (no date)	18	41		Please add at the end of the sentence: "annually."	The desired text was added.
EPA-New England (no date)	19	3	Par. 1	Who will implement the long term groundwater monitoring plan? This needs to be mentioned also. Also in this paragraph, please reference the Army's responsibilities under CERCLA as a result of closure and/or transfer.	The details of the groundwater monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.
EPA-New England (no date)	A-E			Please add the risk tables to the appendix.	The appropriate tables have been added to Appendix E.
MADEP Mar. 25, 1996				Recommends further review of South Post groundwater flow directions, hydraulic conductivity, well construction details and analyzed contaminant levels in the development of the final plan.	The details of the groundwater monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.
MADEP Mar. 25, 1996	D 1	45		Add at the end of the sentence "for the pathways that were assessed."	The desired text has been added.
MADEP Mar. 25, 1996	D 2	6		Please note that the no-action ROD does involve long term monitoring of groundwater.	The following sentence was added to the end of the subject paragraph "Long term groundwater monitoring will be conducted at the site under this "no action" ROD."

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center					
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27					
3. Date Comments Required: Response document					
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response
MADEP Mar. 25, 1996	D 2	16		Add at the end of the sentence "unless the land use changes."	The desired text was added.
MADEP Mar. 25, 1996	ES-1	32		Add at the end of the sentence "even though levels exceeded Army and EPA action levels."	The desired text was added.
MADEP Mar. 25, 1996	ES-1	35		Add to end of sentence "due to the absence of a pathway for any known ecological receptor to access SPIA groundwater."	The desired text was added.
MADEP Mar. 25, 1996	ES-1	38		Add at the end of sentence "for assessed pathways."	The desired text was added.
MADEP Mar. 25, 1996	ES-2	11		Add to end of sentence "to incorporate data from new sentinel well (s) and ascertain any potential impacts to MCI Shirley."	The desired text was added.
MADEP Mar. 25, 1996	ES-2	13		Please note that the Groundwater Monitoring Plan will be completed within six months of ROD signature.	The following text was added to the end of the paragraph "The groundwater monitoring plan will be completed within 6 months of ROD signature"
MADEP Mar. 25, 1996	ES-2	20		Please note that the Ecological Monitoring Plan will be completed within six months of ROD signature.	This information is incorporated in a paragraph dedicated to the Integrated Natural Resources Management Plan, following the specified bullet.
MADEP Mar. 25, 1996	ES-2	33		Please change the text to note that reviews may be needed on a more frequent basis than five years should site conditions change. An example of this would be evidence of transport of a contaminant off-post or a sharp rise in a contaminant concentration in a sampled monitoring well.	The following sentence was added to the end of the paragraph "More frequent reviews may be conducted should site conditions change."
MADEP Mar. 25, 1996	1	24		Please check the acreage figure stated in this sentence. A review of the area indicates that the acreage for the SPIA could be 50% higher than stated.	Total SPIA acreage is 1450 to 1500 acres, however, in this ROD we are only addressing the area of the SPIA north and west of the groundwater divide. This area is about 964 acres. Language has been added to the text to clarify this statement.
MADEP Mar. 25, 1996	1	28		Please note that the SPIA also encompasses several study areas	The text has been modified to read "...as well as several study areas (SA's), and a number of other.."
MADEP Mar. 25, 1996	4	43		Please note that there are information repositories in the Lancaster, Shirley, Harvard and Ayer libraries that contain information relative to ongoing Fort Devens environmental actions.	The following text was added to the end of this section "In addition, there are information repositories in the Lancaster, Shirley, Harvard, and Ayer libraries that contain information relative to ongoing Fort Devens environmental actions. "
MADEP Mar. 25, 1996	5	17		Please note that the Ecological Monitoring Plan will be completed within six months of ROD signature.	The following sentence was added to the end of this paragraph "This plan will be completed within 6 months of ROD signature."

# RECORD OF DECISION

## South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27

1. Originating Organization of Document : U.S. Army Environmental Center								
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27								
3. Date Comments Required: Response document								
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response			
MADEP Mar. 25, 1996	6	1		Please note in this paragraph that more than 50% of the SPIA overlies a medium yield aquifer which is a potential source of drinking water. Therefore, MADEP concurrence with the ROD constitutes MADEP's agreement that the site is adequately regulated under the provisions of 310 CMR 40,000, the Massachusetts Contingency Plan.	The following text was added to this paragraph "More than 50 percent of the SPIA overlies a medium yield aquifer which is a potential source of drinking water. MADEP concurrence with this ROD constitutes MADEP's agreement that the site is adequately regulated under the provisions of 310 CMR 40,000, the Massachusetts Contingency Plan."			
MADEP Mar. 25, 1996	9	40		The MADEP recommends that the metal concentrations of sediments from Cranberry Pond and Zulu Range be reviewed and compared and the sentence corrected as necessary. Cranberry Pond sediment metal concentrations for arsenic, copper, chromium lead, mercury, nickel and zinc appear to be generally higher than those analyzed in Zulu Range sediments.	The sentence has been rewritten and the subject text removed.			
MADEP Mar. 25, 1996	12	38		Please note that any future use of SPIA groundwater will require a human health risk assessment.	The following text was added to the end of the paragraph "Any future use of the SPIA groundwater will require a human health risk assessment."			
MADEP Mar. 25, 1996	16	30		The MADEP notes that although the section contains a discussion of SPIA groundwater, the section cannot be considered complete unless it also encompasses a discussion regarding potential impacts on ecological receptors from contaminated sediments. The MADEP recommends that the section include discussions on soil and sediments.	Appropriate text has been added.			
MADEP Mar. 25, 1996	18	16		The MADEP recommends the installation of the following additional monitoring wells to facilitate SPIA groundwater monitoring and enhance the South Post Groundwater Model: Install a monitoring well between SPM-93-08X and the drinking water well, D-1. The installation of this well was recommended on December 7, 1994 by the Agency for Toxic Substances and Disease Registry	The details of the ghround water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.			
MADEP Mar. 25, 1996				The MADEP recommends the installation of the following additional monitoring wells to facilitate SPIA groundwater monitoring and enhance the South Post Groundwater Model: Add wells south of New Cranberry Pond to detect potential transport of contaminants off-post. The MADEP recommends the installation of three monitoring wells northwest of Trainfire Road.	The details of the ghround water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.			
MADEP Mar. 25, 1996	18	18		The MADEP concurs with the inclusion of EPD-1 in the LTMP. However, we recommend that 26M-92-03X due to the proximity of the two wells, and the variance in contaminants analyzed in the wells' groundwater samples as well as the variance in the screening depth of the two wells. The inclusion of both wells in the LTMP will greatly enhance the Army's ability to detect contaminant transport.	The details of the ghround water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.			
MADEP Mar. 25, 1996				The MADEP recommends that 27M-92-01X be enhanced in the LTMP with the inclusion of both 27M-93-05X or 27M-93-06X. Both of these latter wells are adjacent to 27M-92-01X and are screened at varying depths and contain disparate contaminants which may be related to their screening level.	The details of the ghround water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.			

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center					
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27					
3. Date Comments Required: Response document					
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response
MADEP Mar. 25, 1996	18	22		The MADEP recommends the inclusion of SPM-93-12X in the LTMP. This well provides better screening of the southern portion of the SPIA and intercepts groundwater flow from AOC 25.	The details of the ground water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.
MADEP Mar. 25, 1996	18	29		Please note that the Groundwater Monitoring Plan will be completed within six months of ROD signature.	Text was added.
MADEP Mar. 25, 1996	18	37		Please note that the Ecological Management Plan will be developed within six months of ROD signature.	This information is incorporated in a paragraph dedicated to the Integrated Natural Resources Management Plan, following the specified bullet.
CHPPM for OSG (no date)	13		2	Comment: "Redfox" in this paragraph should be two words. Recommendation: Replace with "red fox"	The desired changes has been made.
CHPPM for OSG (no date)	14		B	Comment: In this paragraph, an example of scientific notation is given in the parentheses. To correspond to the $1 \times 10^{-6}$ , the $1/100,000$ should be $1/1,000,000$ . Recommendation: Please make correction.	The text was modified to read correctly.
CHPPM for OSG (no date)	15		2	Comment: The RME is defined here as exposure to the "maximum contaminant concentrations" at a site. This is misleading because the RME's only equivalent to the maximum detected concentration when the 95 percent UCL exceeds the maximum. Recommendation: If a decision was made to use the maximum concentration as the RME (not the 95 percent UCL) in the risk assessment, this should be stated clearly in the ROD.	The text in this section was modified to read "and the average exposure cases evaluated in the human health risk assessment were based on the maximum and average chemical concentrations in the exposure media, in accordance with USEPA-New England (USEPA 1989) guidance."
CHPPM for OSG (no date)	16		4	Comment: The cancer risk for an adult exposed to sediment is reported to be $1.2 \times 10^{-1}$ . This must be a typo considering the combine risk to an adult is $1.4 \times 10^{-7}$ . Recommendation: Please correct.	Number was entered incorrectly; the appropriate value " $1.7 \times 10^{-7}$ " has been entered.
CHPPM for OSG (no date)	17		C.2	Comment: In both of these sections, the statement is made that some COCs exceeded USEPA guidelines, but the ecological risks were deemed acceptable by USEPA-New England. This appears that the USEPA-New England ignores USEPA guidelines. Recommendation: To avoid misinterpretation by the public, it would be helpful if a sentence was added to these two sections explaining why continued use of the Impact Areas for military training would support USEPA-New England conclusion that the ecological risk is acceptable.	Subject text was removed.
CHPPM for OSG (no date)	18		VII	Comment: According to this section, the Groundwater Monitoring Plan will be further developed but is stated that Well D-1 will be sampled annually. Well D-1 is currently a potable water source to transient personnel while training for two week periods. Recommendation: As part of the Groundwater Monitoring Plan, in accordance with the suggestion of the Agency for Toxic Substances and Disease Registry, a sentinel well should be installed between SPM-93-08X and Well D-1 to detect contaminant migration. This will allow for actions such as prohibiting the use of D-1 as needed if significant concentrations of contaminants should be migrating in that direction.	The details of the ground water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

<b>1. Originating Organization of Document : U.S. Army Environmental Center</b>					
<b>2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27</b>					
<b>3. Date Comments Required: Response document</b>					
<b>4. Reviewed by:</b>	<b>5. Page</b>	<b>6. Line</b>	<b>7. Section</b>	<b>8. Comment</b>	<b>9. Comment Response</b>
CHPPM for OSG (no date)	Gen.			Throughout the text, the term "Contaminants of Potential Concern" is used. However, Tables 18-20 in Appendix E are entitled "Chemicals of Potential Concern". Since the use of "chemicals" is much less negative, suggest replacing "contaminants" with "chemicals" in the ROD.	COPC stands for "Contaminants of Potential Concern", therefore the titles Tables 18-20 in Appendix E will be corrected.
CHPPM for OSG (no date)	Gen.			Overall, concur that the "No Action" alternative is sufficiently protective of human health under current and reasonable anticipated future use scenarios.	No response required.
<b>GENERAL</b>					
Ms. Early Feb. 29, 1996				I am requesting that the Army install test wells at regular intervals surrounding the Fort's perimeter, at variable depths, and test for all possible pollutants including explosives.	The details of the ground water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.
<b>DRAFT PROPOSED PLAN Unauthorized Dumping Area, AOC 41 - February 1996</b>					
MADEP Mar. 27, 1996	1		2	Please clarify the scope of the monitoring plan presented in this paragraph. The stated monitoring of only well D-1 conflicts with the long term monitoring plan information provided in the description of the proposed groundwater monitoring presented on page 20.	The details of the ground water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.
MADEP Mar. 27, 1996	5		1	Please note that the implementation of the Landfill Consolidation Plan will alleviate the problems associated with contaminated soil on the site.  Please note in this paragraph that the source of the chlorinated solvents in the groundwater is unknown.	Not applicable. Subject text was omitted or rewritten.
MADEP Mar. 27, 1996	8		3	The results of the Field Investigation should include a discussion of surface water sediment contamination. A review of data contained in the Final Site Investigation, Groups 2 & 7 (may 1993) indicates sediment arsenic, lead, zinc, heptachlor, DDD and DDE exceedances of NYSDEC and Province of Ontario Criteria. Additionally, lead and iron exceeded USEPA ambient water quality criteria as well as both Massachusetts and EPA drinking water standards.	Not applicable. Subject text was omitted or rewritten.
MADEP Mar. 27, 1996	12		4	The MADEP recommends that the Army review groundwater flow data for the area and provide additional groundwater information as necessary. As we noted in our comments on the final remedial investigation, the MADEP agrees that regional groundwater flow is in an easterly direction and discharges to the Nashua River. However, an inspection of groundwater data levels of site groundwater monitoring wells indicates at least some local groundwater flow towards New Cranberry Pond. A review of Figure 3, referenced in this paragraph, indicates the presence of contours on the figure. Please indicate on the legend whether these contours are for surface topography or groundwater.	The details of the ground water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.
MADEP Mar. 27, 1996	20		5	The MADEP concurs with the inclusion 41M-94-09A, 41M-94-09B, and 41M-94-11X in the long term monitoring plan. However, we recommend the provision of further rationale for the inclusion of 41M-94-12X in the plan. Additionally, we recommend inclusion of a monitoring well on the southern portion of the site for incorporation into the plan. Either 41M-94-04X or 41M-94-14X would be appropriate for the detection of any potential contaminant transport.	The details of the ground water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

<b>1. Originating Organization of Document : U.S. Army Environmental Center</b>					
<b>2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27</b>					
<b>3. Date Comments Required: Response document</b>					
<b>4. Reviewed by:</b>	<b>5. Page</b>	<b>6. Line</b>	<b>7. Section</b>	<b>8. Comment</b>	<b>9. Comment Response</b>
AEC (unspecified)	1		Par. 1	Spell out AOC.	"AOC" is in the "Acronyms" section of the ROD.
AEC (unspecified)	1		Par. 2	Change "the groundwater will be monitor at the" to "the groundwater will be monitored at the"	Not applicable. Subject text was omitted or rewritten.
AEC (unspecified)	1		Par. 2	Change "adversely effect" to "adversely affect"	Not applicable. Subject text was omitted or rewritten.
AEC (unspecified)	2		Par. 1	Why are we saying this twice.	Not applicable. Subject text was omitted or rewritten.
AEC (unspecified)	3		Par. 1	Add address info and/or phone numbers.	Not applicable. Subject text was omitted or rewritten.
AEC (unspecified)	4		Par. 1	Spell out MADEP.	MADEP is defined in the ROD.
AEC (unspecified)	8		Par. 2	Define "fluvial" or use simpler term.	Not applicable. Subject text was omitted or rewritten.
AEC (unspecified)	8		Par. 7	Add "micrograms per liter, or" prior to µg/L.	Not applicable. Subject text was omitted or rewritten.
AEC (unspecified)	8		Par. 7	Is there some more descriptive way that these numbers can be presented so that the public understands?	Not applicable. Subject text was omitted or rewritten.
AEC (unspecified)	10		Tab. 1	Spell out c-1,2-DCE	Not applicable. Subject text was omitted or rewritten.
AEC (unspecified)	10		Par. 6	Spell out "VOCs" and reference in glossary.	"VOCs" is in the "Acronyms" section of the ROD
AEC (unspecified)	12		Par. 6	What is the allowable level of TCE? Might want to include.	Not applicable. Subject text was omitted or rewritten.
AEC (unspecified)	13		Par. 1	Define "based on the blank data assessment"	Not applicable. Subject text was omitted or rewritten.
AEC (unspecified)	18		Par. 4	Need to put risks in terms the public can understand - for example if risks are $1 \times 10^{-6}$ , say "The risk is that one person in one million of developing cancer." See Section B, P.14 of ROD for AOCs 25, 26, and 27.	Not applicable. Subject text was omitted or rewritten.
<b>DRAFT FINAL ROD SPIA and AOC 41 Groundwater and AOCs 25, 26, and 27 - April 29, 1996</b>					
MADEP May 10, 1996	DS-2		3	Please change "three AOCs" to "four AOCs"	The indicated change is not appropriate. However, the text has been changed to read "SPIA groundwater, AOC 41 groundwater, and the three AOCs"
MADEP May 10, 1996	DS-2		4	Please note that the Groundwater Monitoring Plan and Ecological Monitoring Plan are to be Implemented within 6 months of ROD signing.	The desired change has been made.
MADEP May 10, 1996	ES-2		3	Please note that the Ecological Management Plan will be completed and implemented within 6 months.	No change was made since this is stated in the 9th paragraph on that page.
MADEP May 10, 1996	5		1	The public meeting transcript is not included in the Responsiveness Summary as stated in the text. Please include them in the final draft.	They will be included in the Final ROD.

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center					
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27					
3. Date Comments Required: Response document					
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response
MADEP May 10, 1996	6		2	Please discuss South Post Impact Area (SPIA) groundwater discharge in this paragraph. Although it is noted that groundwater from the ranges does not leave the SPIA, some discussion regarding flows of groundwater from the SPIA itself would be appropriate.	A paragraph from the RI which discusses this issue will be incorporated into the ROD in its entirety.
MADEP May 10, 1996	17		5	Although information regarding AOC 41 is noted in the Documentation of No Significant Changes, a description of the remedial alternative for the site should be included in Section VII in order to enhance the continuity of the report.	All information regarding AOC 41 is included in the Documentation of Significant Changes in accordance with EPA-New England guidance
MADEP May 10, 1996	18		1	Please note that wells will be used to monitor the southern portion of the SPIA as well as the other sides mentioned in the paragraph. The MADEP considers the inclusion of wells located on the southern portion of the SPIA to be an integral part of any long term monitoring plan in that there are off-post areas in this direction that are impacted by SPIA groundwater flow prior to flow reaching the Nashua River.	Mention of specific groundwater monitoring wells are not made in the ROD. The details of the groundwater monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.
MADEP May 10, 1996	18		3	Please note that further assessment of remedial action will be required if implementation of the long term monitoring plan indicates an increase or transport of contaminants.	An evaluation of all monitoring data will be conducted every 5 years in accordance with EPA guidance.
MADEP May 10, 1996	18		5	Please note that the Ecological Management Plan will be developed and implemented within six months of ROD signature.	No change was made since this is stated in the 7th complete paragraph on that page.
MADEP May 10, 1996	18		5	Please add an additional paragraph stating that the South Post Groundwater model will be refined to include MCI Shirley and to provide better resolution of the southern portion of the South Post.	The South Post groundwater model will not include MCI Shirley. The Army will share the data with MCI Shirley if they should chose to run their own model.
MADEP May 10, 1996	18		7	Please change "three AOCs" to "four AOCs"	The indicated change is not appropriate. Only AOC 41 groundwater is addressed in this ROD. The 5th paragraph on the previous page was altered to reflect this comment.
MADEP May 10, 1996	18		9	The MADEP recommends a review of data generated by the long term monitoring plan on an annual basis. A five year review is insufficient to be protective of human health and the environment.	Monitoring will be conducted annually and the data will be evaluated every 5 years in accordance with EPA guidance.
MADEP May 10, 1996	20		5	The off-site laboratory results should be presented for AOC 41 in this paragraph as was done for the other AOCs rather than referring the reader to the RI report.	This will be included in the ROD.
MADEP May 10, 1996	21		3	Please present the results of the baseline risk assessment in this section as opposed to referring the reader to other documentation.	This will be included in the ROD
MADEP May 10, 1996	21		4	The MADEP's review of groundwater data indicates that New Cranberry Pond surface water is not recharging AOC 41 groundwater, therefore the Army's statement that groundwater from AOC 41 cannot impact New Cranberry Pond ecological receptors may be flawed. MADEP recommends that this issue be resolved before this statement is included in the ROD.	The Army disagrees with this statement. New Cranberry Pond is man made. Because of these artificial surface water elevations, New Cranberry Pond recharges to the AOC 41 groundwater.

# RECORD OF DECISION

## South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27

Page D - 15

1. Originating Organization of Document : U.S. Army Environmental Center					
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27					
3. Date Comments Required: Response document					
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response
MADEP May 10, 1996	D-5			The MADEP disagrees with the Army's statement that a number of MADEP comments regarding the Proposed Plan were received subsequent to the Proposed Plan's finalization. The MADEP forwarded its comments on the Proposed Plan within 30 days of our January 31, receipt of the plan. The MADEP recommends that the Army respond to our comments.	The MADEP comments received by the Army that were not addressed pertained to the content and wording of the Proposed Plan or Fact Sheet. When these were published in January 1996 they were final. All comments received following their publication were incorporated, as appropriate, into the ROD.
USEPA-New England May 14, 1996	DS			The first sentence should read "...SPIA groundwater, AOC 41 groundwater, and the three AOCs..."	The desired change was made.
USEPA-New England May 14, 1996	ES-1		2	Please mention that the landfill portion of AOC 41 will be handles separately (under State solid waste program?).	The following text was added to the end of this paragraph "The landfill portion of AOC 41 will be addressed under a separate action."
USEPA-New England May 14, 1996	ES-2		1	In the fourth sentence, please delete "by EPA New England".	The indicated text was deleted.
USEPA-New England May 14, 1996	ES-2		1st bullet	At the end of the third sentence, delete the word "annually", we have not decided on the sampling frequency as of yet.	The indicated text was deleted.
USEPA-New England May 14, 1996	ES-2		3rd bullet	Delete the word "annually", we have not decided on the sampling frequency as of yet.	The indicated text was deleted.
USEPA-New England May 14, 1996	5		1	Please add the public meeting summary and responsiveness summary to appendix D.	They will be included in the Final ROD.
USEPA-New England May 14, 1996	17			In the first sentence please add "...SPIA groundwater, AOC 41 groundwater, and the three AOCs..."	The desired changes was made.
USEPA-New England May 14, 1996	18		1st and 3rd bullets	Please delete the word "annually", we have not decided on the sampling frequency as of yet	The indicated text was deleted
USEPA-New England May 14, 1996	19		1	Please mention that the landfill portion of AOC 41 will be handles separately (under State solid waste program?).	The following text was added to the end of this paragraph "The landfill portion of AOC 41 will be addressed under a separate action."
USEPA-New England May 14, 1996	20			Please briefly discuss the sampling results in the same level of detail you do for other AOCs.	This will be included in the Final ROD.
USEPA-New England May 14, 1996	21 - 22			Please briefly discuss the sampling results in the same level of detail you do for other AOCs.	This will be included in the Final ROD.

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center					
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27					
3. Date Comments Required: Response document					
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response
USEPA-New England May 14, 1996	A			On Page 1, this map should be larger and clearer in detail. It is difficult to read as presented. There should also be a maps of AOC 41 similar to the ones you have for the other AOCs (sampling and monitoring locations, results, etc.) On Page 1, this map should be larger and clearer in detail. It's difficult to read as presented.	This will be included in the Final ROD.
USEPA-New England May 14, 1996	D			Please add the public meeting transcript and responsiveness summary to Appendix D.	This will be included in the Final ROD.
USEPA-New England May 14, 1996	E			There are a number of AOC 41 tables missing in the Appendix. Please insert the appropriate AOC 41 results tables (groundwater, soils, COPCs, risk, etc.).	This will be included in the Final ROD.
Conservation Commission, Lancaster, MA May 29, 1996	Gen.			We request that the monitoring stations be placed such that migration can be detected in any direction and will be detected well before it could travel off post, regardless of new well development in Lancaster.	The details of the ghround water monitoring plan (including number and location of monitoring points) will be developed jointly by the Army, USEPA-New England, U.S. Fish and Wildlife Association, and MADEP.
Conservation Commission, Lancaster, MA May 29, 1996	Gen.			We would like to know at what point a clean-up would be initiated.	If contamination is detected off site, remedial action will be initiated by the Army with consultation with EPA-New England and MADEP.
Conservation Commission, Lancaster, MA May 29, 1996	Gen.			We also request that a report of findings be provided on an annual basis and that it be submitted to the Conservation Commission as well as the Board of Health, Planning Board, Board of Selectmen, as well as the Town Library. This report should contain a summary and/or benchmarks for comparing data so they can be understood by people outside the hazardous waste profession.	The Army agrees. The Conservation Commission as well as the Board of Health, Planning Board, Board of Selectmen, and Town Library will be added to the distribution list if not already listed. The details of the monitoring report content and presentation will be developed during the preparation of the groundwater monitoring plan.
Conservation Commission, Lancaster, MA May 29, 1996	Gen.			We suggest that provisions for meetings and public information activities be reserved in the event that migration or increased contamination is detected. Public involvement notices and legal notices should be placed in newspapers that serve the Town of Lancaster instead of surrounding towns which has apparently been the case.	The Army conducts Restoration Advisory Board meetings monthly. These are open to the public and serve as a forum for the public to comment on Army restoration activities and obtain information. The Ft. Devens BEC can provide the interested parties with the schedule and location of these meetings.
Conservation Commission, Lancaster, MA May 29, 1996	Gen.			We beleive that the addition of site #41 after the public meeting was somewhat confusing and the information about this site is not clearly presented in the report. During the public meeting a question was raised concering what would be done at the landfills on the South Post. It was stated that a plan was being developed that would include consideration of excavation and other alternatives. We understand that #41 is a landfill and yet the report makes no mention of landfill cleanup.	Section IX of the ROD states that "The landfill portion of AOC 41 will be addressed under a separate action." The Army intends to address this under the Massachusetts solid waste regulations.

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center					
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27					
3. Date Comments Required: Response document					
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment	9. Comment Response
Conservation Commission, Lancaster, MA May 29, 1996	Gen.			We respectfully request that the Town be kept informed of proposed actions for the cleanup of dumps and landfills, as well as groundwater monitoring.	The Army agrees the Conservation Commission as well as the Board of Health, Planning Board, Board of Selectmen, and Town Library will be added to the distribution list if not already listed.
FINAL ROD SPIA and AOC 41 Groundwater and AOCs 25, 26, and 27 - May 30, 1996					
USEPA-New England June 11, 1996	Decl. Pg. 2		Last Para.	Suggested change: "Should the Army close of transfer or change the use of this property an EBS will be conducted, and the "no action" decision in this ROD will be re-examined in light of the changed use and risk factors resulting from this closure/transfer.	Suggested change was made.
USEPA-New England June 11, 1996	ES-2			Suggested change: Risk assessment refers only to EOD, Zulu, and Hotel Ranges. Please discuss the AOC 41 risk assessment briefly.	Additional text was added.
USEPA-New England June 11, 1996	ES-3			Suggested change: If on-site hazardous substances, pollutants or contaminants that may present an imminent and substantial endangerment to the public health and welfare..", This statement should also appear in the body of the ROD, in "Description of the No action Alternatives" Section.	Suggested change was made.
USEPA-New England June 11, 1996	ES-3			Suggested change: If the Army closes or transfers or changes the use of the property, an EBS will be conducted, and the "no action" decision of this ROD will be re-examined	Suggested change was made.
USEPA-New England June 11, 1996	1		2	Please add that the landfill portion of AOC 41 will be handled under a separate action as you have done in the Executive Summary.	Suggested text was added.
USEPA-New England June 11, 1996	4		Community Participation	Correction: A typo - public meetings	Correction was made.
USEPA-New England June 11, 1996	5		Sect IV, last full line	Change: "additional assessments may be required" to additional assessments will be required"	Suggested text was added.
USEPA-New England June 11, 1996	17		Sect. VIII, 1st sent.	Please add "...and AOC 41 groundwater"	Suggested text was added.
USEPA-New England June 11, 1996	18		Last ara., 2nd line	Please add: "...an assessment is made as to whether the implemented no action alternative remains protective"	Suggested text was added.
USEPA-New England June 11, 1996	18		Last para., 4th line	Please change to: "If on-site hazardous substances, pollutants or contaminants that may present an imminent and substantial endangerment to public health and welfare..".	Suggested change was made.
USEPA-New England June 11, 1996	18		Last para., 7th line	Please change to: "If the Army closes or transfers or changes the use of the property, an EBS will be conducted, and the "no action" decision of this ROD will be re-examined."	Suggested change was made.

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

1. Originating Organization of Document : U.S. Army Environmental Center								
2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27								
3. Date Comments Required: Response document								
4. Reviewed by:	5. Page	6. Line	7. Section	8. Comment				9. Comment Response
USEPA-New England June 11, 1996	24	4		Please add: "...an assessment is made whether the no action alternative remains protective of human..."				Suggested text was added.
USEPA-New England June 11, 1996	25		1st para., last sent.	It is not appropriate to speak of a "no action" decision as "using permanent solutions to the maximum extent practicable." Please delete this sentence, and state that "no action is necessary to ensure protection of human health and the environment."				Text was deleted and added as suggested.
USEPA-New England June 11, 1996	App. A			Please add maps of AOC 41 similar to the ones you have for the other AOCs (sampling & monitoring location, results, etc.) On page A-11 - please improve the quality of this map, it is difficult to interpret.				Maps were added. They are as similar as possible. However, two separate firms prepared the RI's for AOC 25, 26, and 27 and AOC 41 each in their own format, therefore the maps will not be identical in their information content and presentation.
MADEP June 14, 1996	ES-2		4	The MADEP recommends that the description of the remedy include the following: A preclusion of further development of drinking water supplies in the monitored areas.				The Army will preclude the development of drinking water sources in the monitored area.
MADEP June 14, 1996	ES			Add AOC 41 to the list of sites where groundwater monitoring will be conducted. The first paragraph of the remedial description notes that monitoring will be conducted at EOD, Zulu and Hotel Ranges. AOC 41 should be included in that Section IX, Documentation of Significant Changes, includes no provisions for groundwater monitoring at AOC 41.				The Army will add AOC 41 to this list.
MADEP June 14, 1996	ES			The MADEP requests that the remedial description note that the sites will be subjected annual reviews and that any indications of contaminant transport, emanating from the AOCs, within the SPIA or off the SPIA will precipitate further assessment actions.				The desired text was added.
MADEP June 14, 1996	ES			Any change of use will require further assessment action. Although this is mentioned in Section IV of the document, it should be listed as a component of the remedy.				The desired text was added.
MADEP June 14, 1996	1		4	Please refine the description of the area to be covered by the ROD. The description currently presented defines the entire SPIA and not the ROD coverage area noted in the executive summary. Additionally, an appropriate figure should be presented which delineates the areal scope of the ROD.				The text was modified.
MADEP June 14, 1996	5		1	Please delete references to any Feasibility Study (FS) having been conducted for the ROD sites. The ROD alludes to an FS having been conducted for the SPIA and associated sites. However, no FS was conducted for the sites. An Initial Screening of Alternatives for Functional Areas I and II was published in June 1994, but presented no alternatives were presented for the South Post.				The indicated text was deleted.
MADEP June 14, 1996	5		3	Please explain how continued use of the SPIA makes the risks to on-site ecosystems acceptable. Continued use of the area does not appear to do anything to ameliorate ecological risk and may actually enhance risk. The sentence describing this phenomenon is repeated several times in the ROD and should be expunged or clarified.				The text was modified.
MADEP June 14, 1996	16			Please note Comment 4 regarding the Ecological Risk Assessment Section.				The text was modified.
MADEP June 14, 1996	16		5	Please correct the paragraph heading that notes Hotel Range as AOC 25. The EOD Range is the correct designation for AOC 25.				The change was made.

**RECORD OF DECISION**

**South Post Impact Area & AOC 41 Groundwater and AOCs 25, 26, & 27**

<b>1. Originating Organization of Document : U.S. Army Environmental Center</b>					
<b>2. Document Title: Draft Final Record of Decision for the South Post Impact Area and Area of Contamination 41 Groundwater, and Areas of Contamination 25, 26, and 27</b>					
<b>3. Date Comments Required: Response document</b>					
<b>4. Reviewed by:</b>	<b>5. Page</b>	<b>6. Line</b>	<b>7. Section</b>	<b>8. Comment</b>	<b>9. Comment Response</b>
MADEP June 14, 1996	17		1	Please correct the paragraph describing conduct of toxicology tests on AOC 27 surface water. A review of the RI indicates that the toxicology tests were conducted on AOC 26.	The toxicity testing did take place at AOC 26. This paragraph refers to the results of that testing for comparison purposes.
MADEP June 14, 1996	17		5	Please describe the Army's plan for future explosive ordnance disposal.	No UXO disposal activities are occurring at this time.
MADEP June 14, 1996	18		1	See Comment #1.	The text was modified.
MADEP June 14, 1996	25		1	Please describe how the remedial alternative would "use permanent solutions to the maximum extent possible". The MADEP is of the opinion that the lack of source identification and control inherent in the no-action alternative is a temporary solution.	The text was modified.
MADEP June 14, 1996	25		1	See Comment #3.	The text was modified.

**This page intentionally left blank**