

**Record of Decision
Naval Air Station, South Weymouth, MA
Appendices**

Appendix E:

- E1. Public Comments on the Proposed Plan for the Rubble Disposal Area**
- E2. Transcript of Public Hearing on the Proposed Plan for the Rubble Disposal Area**

South Shore Tri-Town Development Corporation

223 Shea Memorial Drive, South Weymouth, MA 02190

March 26, 2003

Mr. Mark Krivansky
Remedial Project Manager
U.S. Department of the Navy
10 Industrial Highway Mail Stop 82
Lester, PA 19113-2090

Re: United States Navy, Proposed Plan, Operable Units 2 and 9, Rubble Disposal Areas, Naval Air Station South Weymouth, Weymouth, Massachusetts, February 2003

Dear Mr. Krivansky:

These comments are submitted on behalf of the South Shore Tri-Town Development Corporation (the "Corporation") with respect to the United States Navy's Proposed Plan for the Rubble Disposal Area ("RDA"), issued in February 2003. Under its Enabling Legislation, the Corporation represents the interests of its constituent communities (the Towns of Abington, Rockland, and Weymouth) with respect to issues related to the redevelopment of Naval Air Station South Weymouth. As has been made clear from the tenor of public comments at the Navy's public hearing on the Proposed Plan as well as in many other formal and informal settings in the community, capping the Rubble Disposal Area in place, even after limited removal of PCB-contaminated material, is not currently acceptable to the constituent communities of the Corporation.

Among the possible issues of concern to the host communities are the potential liability associated with municipal ownership of property with capped waste in place; the potential inconsistency of having a closed landfill on land zoned as a Water Resources Protection Overlay District¹ which prohibits landfills because of underlying high and medium yield aquifers classified as Potential Drinking Water Source Areas; and the potential for interference with the implementation of the Reuse Plan, as discussed in previous Corporation comments, and the PBC Utilization Plan. Special deference should be accorded to the community concerns in this case because the host communities will ultimately be the owners of the property that includes the RDA because most of this land is expected to be transferred as part of the Public Benefit Conveyance ("PBC").² The Corporation is concerned with this lack of

¹ See, *Zoning and Land Use By-Laws for NAS South Weymouth*, adopted by the Naval Air Station Planning Committee and by the three towns.

² PBC land can only be conveyed to another eligible governmental agency, with approval of the National Park Service. Under its Enabling Legislation, the Corporation has a limited life span. At least two

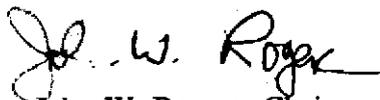
Mr. Mark Krivansky
March 26, 2003
Page 2

community acceptance, which suggests that further consideration should be given to removal options for the RDA, perhaps in conjunction with remedy selection for the West Gate Landfill.

The Corporation is also concerned about unresolved technical issues, as further detailed in previous comments from the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection. These regulator comments reflect concern with the timing of investigation into numerous issues which must be finally resolved before they can approve a record of decision for the RDA site. These include, but are not limited to, the necessity for characterization of disposal material and analysis of the flood hazard. The Corporation suggests that doing this investigation before, not after, remedy selection would help address community questions.

The Corporation is pleased to have this opportunity to submit comments and we look forward to working with the U.S. Navy, the EPA, and the DEP to select a remedial alternative that is acceptable to the host communities and consistent with the basic legal documents governing reuse of the base.

Very truly yours,



John W. Rogers, Chairman
Board of Directors

MKR:nmn

cc:	M. DiGeambeardino, Navy	J. Young, KEI	Board of Directors
	P. Whittemore, U.S. EPA	D. Urann, CH2M	
	A. Malewicz, MA DEP	S. Smith, CH2M	
	D. Chaffin, MA DEP	D. Hall, Lennar	
	M. Ryan, N, M&F	Congressman Delahunt	
	S. Ivas, IE	Towns of Abington, Rockland & Weymouth	

F:\1.10 BASE (ON SITE WORK)\1.10.11 Navy Clean Up\1.10.11.5 Solid Waste\RUBBLE DISPOSAL COMMENTS 3.26.03.DOC

years prior to its dissolution, the three surrounding communities of Abington, Rockland and Weymouth are required to enter into an intermunicipal agreement that provides for, among other things, (a) acceptance of ownership of all real and personal property owned by the Corporation, (b) assumption of all contractual obligations of the Corporation, and (c) arrangements for the provision of municipal services. Thus, after dissolution of the Corporation, the ownership and management of the PBC lands will transfer to the community (Abington, Rockland or Weymouth) in which such lands are located and be overseen by the applicable community officials and boards. For these reasons, the three communities are very concerned about the potential liability and long-term responsibilities inherently associated with municipal ownership of property with waste in place.



TOWN OF ROCKLAND
Board of Selectmen

Town Hall
242 Union Street
Rockland, Massachusetts 02370

Phone: 781-871-1874
Fax: 781-871-0386

Chairman:
John R. Llewellyn, Esq.
Vice-Chairman:
Lawrence J. Chaffee
Selectmen:
Larry J. Ryan
Mary A. Parsons
Louis U. Valanzola

Town Administrator:
Bradley A. Plante

February 25, 2003

Mr. Mark Krivansky
Remedial Project Manager
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19913-2090

Re: Public Hearing, Naval Air Station, South Weymouth

Dear Mr. Krivansky,

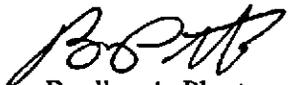
The Rockland Board of Selectmen at their meeting of February 24, 2003 voted unanimously to recommend that the Navy proceed with the actions as outlined in the Public Information Session and Public Hearing Notice distributed to the towns on 2/19/03. The board recommends the Navy take the following options for the RDA including the former disposal area and adjacent impacted wetlands as outlined in the notice.

- Remove PCB-impacted soils from the wetlands and dispose off-site, construct a soil cover over the disposal area, and conduct long-term monitoring and institutional controls.
- Remove all disposed materials and the PCB-impacted soils from the wetlands and dispose off-site, and implement institutional controls.

If you have any questions please feel free to contact me.

Sincerely,

FOR THE BOARD OF SELECTMEN


Bradley A. Plante
Town Administrator

CC: Environmental Protection Agency
Dr. John Rogers, SSTDC



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Board of Selectmen

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Bradley A. Plante

March 24, 2003

Mr. Mark Krivansky
Remedial Project Manager
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19913-2090

Re: Public Hearing, Naval Air Station, South Weymouth

Dear Mr. Krivansky,

The Rockland Board of Selectmen has had further discussion on the subject of the "Proposal Plan for the Rubble Disposal Area" at the Naval Air Station, South Weymouth, MA. At the last meeting of March 24th the board agreed to recommend the "Alternative RDA-6: Remove All Disposed Materials at the RDA and Soil and Sediment Containing PCBs and Dispose of Off-Site." We request you file this recommendation as the board's official position on the matter.

If you have any questions please feel free to contact me.

Sincerely,

FOR THE BOARD OF SELECTMEN

Bradley A. Plante
Town Administrator

CC: Environmental Protection Agency
Dr. John Rogers, SSTDC

Stanley, Alexandra

From: lenahiggs@attbi.com
Sent: Thursday, March 06, 2003 12:16 PM
To: Krivansky, Mark E (EFANE)

Dear Mr. Krivansky:

I am writing to you in regards to the cleanup proposal for the Naval Base

in South Weymouth, Mass. by the Navy. I strongly advise that the remedial alternative be RDA6. This problem started with the The Navy, and they should

be responsible to clean it up 100%. We as tax payers and homeowners are responsible for our land on which we live and we have to maintain any problems before we

can sell our property by law, so I feel the Navy should be responsible to clean

all the land that has been contaminated by THEM! Thank you Linda Higgins

Stanley, Alexandra

From: Accomando, Jennifer [jaccomando@stonehill.edu]
Sent: Friday, March 21, 2003 8:11 PM
To: Krivansky, Mark E (EFANE)
Subject: Naval Air Base

Stanley, Alexandra

From: W Cotter [cotterw@earthlink.net]
Sent: Friday, March 21, 2003 12:28 PM
To: Krivansky, Mark E (EFANE)
Subject: RDA cleanup NAS South Weymouth

Hi Mark,

I feel that alternative RD-5 is a half measure for cleanup considering the close proximity to the Swamp River which supplies 25% of Weymouth's water demand. Ground water can migrate to the Swamp River and allow any latent chemicals, metals to enter the water supply.

If this site is hazardous enough to fence in after RD-5 remediation, I think it is unacceptable to allow the possibility for drinking contaminated water downstream.

Respectfully ask that the entire RDA site be removed down to eight feet and taken offsite and replaced with new soil. RDA can be restored to it's original condition no fence or warning signs needed

William Cotter
39 Wingate Rd
Weymouth MA 02189

Stanley, Alexandra

From: Mrmclifford@aol.com
Sent: Tuesday, March 18, 2003 9:48 PM
To: Krivansky, Mark E (EFANE)
Subject: (no subject)

Dear Sir:

I am very concerned about the waist from The S Weymouth Naval Air Base.

My family of 6 children, myself and my husband lived on Ellis Circle for
30

years while the children were growing up, It runs from Pine St. to Old
Swamp

River. I have a very ill daughter with a neuromuscular disease. I am
also

concerned about our grandchildren. Please take care of the problem so
that

none else can become sick from this.

Muriel M. Clifford
90 Arbor Way
Hyannis, MA. 02601

Stanley, Alexandra

From: vze2n8tr@verizon.net
Sent: Tuesday, March 25, 2003 3:21 PM
To: Krivansky, Mark E (EFANE)
Subject: Rubble Disposal Area

Mr. Mark Krivansky
Navy Remedial Project Manager

March 25, 2003

Dear Mark

Please submit these comments regarding the Rubble Disposal Area. As you know myself and Dave Wilmot want to see all areas of the base cleaned up properly. The followig are some of our concerns with this area and what we propose for clean up.

1. This site has many toxic chemicals in it that sit right on Swamp River, which feeds into Whitman's Pond, which is a secondary drinking water source for the Town of Weymouth.
2. The EPA recently announced that TCE is now 60x more toxic then orginally thought.
3. The EPA has just announced (within the last 2 months) that children are 10 times more susceptible then was previously thought.
4. Capping will not eliminate the danger to children in the area, water land, etc.
5. With all the illness surrounding the Navy Base, the precautionary principle should be followed for this site and any future clean up sites.

Therefor we recommened Alternative RDA*6: Remove All Disposed Materials Offsite.

Respectfully

Liz Tomolillo 50 Spruce Street Rockland
Dave Wilmot 10 Arch Street Abington

Stanley, Alexandra

From: Larry Cassese [redwitch98@attbi.com]
Sent: Tuesday, March 25, 2003 5:52 PM
To: Krivansky, Mark E (EFANE)
Subject: PCB removal

My wife and I have lived in our house on the shore of Whitmans pond for over 53 years, and we want to enjoy many more years on a clean and safe body of water. Please remove the PCBs at the NAS and dispose of them off site.

Thank you
Larry Cassese
196 Lake Street
Weymouth, MA

March 25, 2003

Mr. Mark E. Krivansky
Remedial Project Manager
U.S. Department of the Navy
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

Dear Mr. Krivansky:

In response to the Public Comments Period regarding South Weymouth Naval Air Station Operable Units 2 and 9, Rubble Disposal Areas, I would like to voice my support for RDA-6 Remove all Disposed Material at the RDA and Sediment Containing PCBs and Dispose Off Site.

A 2001 study of Whitman's Pond done by Beta Engineering for the Town of Weymouth indicates levels of metals in the sediment, specifically Beryllium, and notes Beryllium as being sourced from military activities including aircraft propellants and jet fuels. This study was difficult to obtain from the Town and suggests other environmental effects from the Base not known to residents of the Town. Whitman's Pond is part of the Town of Weymouth's watershed and a secondary source of drinking water for the Town. Whitman's Pond is connected to Old Swamp River which borders the South Weymouth Naval Air Station site.

As the South Weymouth Naval Air Station was built on wetlands adjacent to the river, it is subject to flooding not only from the rain above, but from the water that flows through the ground providing opportunity for continued watershed contamination. Additionally, the South Weymouth Naval Air Station is on top of a medium-yield aquifer. An inordinate number of people who live in Weymouth are turning up with illnesses such as MS, ALS, and various cancers.

RDA-6 should be the only course of action for the cleanup of Operable Units 2 and 9, Rubble Disposal Areas in order to ~~prevent~~ future contamination of the watershed from the South Weymouth Naval Air Station.

Thank you for the opportunity to voice my concerns.

Respectfully,



Patricia Pries
15 Woodbine Road
Weymouth, MA

MaryAnn and Richard Lindsay
25 Woodbine Rd.
MARYANN and Richard LINDSAY

Teri L Hayward
16 Woodbine Rd
Weymouth MA 02189
Teri L. Hayward

Stanley, Alexandra

From: Humpty7173@aol.com
Sent: Tuesday, March 25, 2003 8:44 PM
To: Krivansky, Mark E (EFANE)
Subject: (no subject)

i support the RDA-6 PROPOSAL ONLY

Stanley, Alexandra

From: William Johnson [barbilljo@attbi.com]
Sent: Wednesday, March 26, 2003 12:30 PM
To: Krivansky, Mark E (EFANE)
Subject: Rubble Disposal Landfill Removal

To be done:

RDA-6: As a long standing past member of the RAB I firmly believe that all of the rubble should be removed from the RDA and disposed at a hazardous waste disposal area off site. Too many PCB's and other contaminates are polluters of Weymouth's drinking water from this site via Old Swamp River. The removal should take place before any building can be done on the base.

Sincerely
Barbara Johnson
41 Massasoit Rd.
N. Weymouth, MA 02191
barbilljo@attbi.com <mailto:barbilljo@attbi.com>
March 26, 2003

Stanley, Alexandra

From: Rakers [weyrakers@attbi.com]
Sent: Wednesday, March 26, 2003 12:53 PM
To: Krivansky, Mark E (EFANE)
Subject: Removal of all toxic waste at Air Base - Public Comments

My preference for toxic clean up of air base would be RDA - 6

Marie Feely
49 Cranch Street
Weymouth, MA

Stanley, Alexandra

From: Rakers [weyrakers@attbi.com]
Sent: Wednesday, March 26, 2003 12:56 PM
To: Krivansky, Mark E (EFANE)
Subject: Public comments - base clean up

RDA - 6 is needed for air base clean up nothing else is acceptable

K Newman
Weymouth, MA

Stanley, Alexandra

From: Rakers [weyrakers@attbi.com]
Sent: Wednesday, March 26, 2003 12:57 PM
To: Krivansky, Mark E (EFANE)
Subject: Base Clean Up

RDA - 6 level of clean up is needed on the air base

J. Rakers
126 West St.
Weymouth, MA

To: South Weymouth Naval Air Station(SWNAS) Rubble Disposal Area

From: Dave Wilmot, Abington citizen

Date: 03-27-03

Re: Comments as Regards Naval Remediation of South Weymouth Naval Air Station(SWNAS) Rubble Disposal Area(RDA) Cercla Site.

Being a member of a growing group of citizens with serious health concerns in neighborhoods surrounding the former air station, my question will be surmised in a statement concerning my disagreement with the Navy's proposed remediation method.

The Rubble Disposal Area Superfund Site is a former dumping ground located beside and in Wetlands, directly adjacent to Old Swamp River, a water way that runs North through the base, and discharges into Whitman's Pond in Weymouth. Whitman's Pond is the city of Weymouths secondary drinking water source.

The Navy admits that they have four substances of concern, that have been found in the Rubble Disposal Area.

The concerns in the Rubble Disposal Area, were established by concentrations of these substances being heavier in the RDA than Baseline Sample Testing that was done. The four substances; PCB's, Arsenic, Lead and Benzo(a)Pyrene , are four of the eight top substances that the Federal Center for Disease Control's Toxic Disease Registry has labeled as Priority Toxins. Since this priority toxin listing is made up of 278 substances, I would have assumed, having four of the top eight of these substances in elevated levels at this former dump, would make it subject to a full and complete cleanup.

I would also have assumed, that presence of these four toxins with a direct migratory path to the City of Weymouth's Secondary drinking water supply, would mandate a complete cleanup being done. I would like to hear the Navy's position on its BRAC responsibilities to our towns public health.

As the State Department of Public Health continues their efforts to find out why children in South Weymouth have developed Arsenic Poisoning, I believe the leaching of admittedly high concentrations of Arsenic from this landfill, directly into Old Swamp River would provide an interesting avenue of exploration for the State Health scientists. Much effort has been given to studies of Great Pond, but what of South Cove in Whitmans Pond, where the remainder of the drinking water in Weymouth is pumped from. The Navy and United States Government should afford our citizens the most comprehensive Public Health efforts available to them. To do less, when known contaminants from the former base, can be proved to be migrating offsite with proper testing methods, would seem to me to be criminal.

A Habitat Study of Whitman's Pond, completed by Beta Group in 2001 for the City of Weymouth, cited elevated levels of Lead, Iron and Manganese, Arsenic and Beryllium in the pond sediments. Given the limited uses of Beryllium, I would have high suspicions of off base migration of pollutants. Per this document, Beryllium is used in "numerous military activities, including aircraft construction, rocket propellants and jet fuel. This would assumedly be a direct link to SWNAS pollutant migration off site. Please provide other possibilities for this toxins presence in Whitman's Pond. Why has the Navy consistently refused to test wells outside the base. We insist the Navy take responsibility for past environmental degradation done to our communities.

The Navy's preferred method of cleanup is the 1.6 million option presented in their pamphlet, which would consist of a removal action of some of the PCB-contaminated wetland soil, and construction of a cap over the remaining contaminants. Unfortunately, I believe historically and again in this case, that money concerns are prioritized above Public Health concerns. I don't believe the Navy preferred cleanup route is just to the people of our towns.

Anything less than Option 6 (Complete Offsite Removal) undermines the Public Health of our towns.

Removing All contaminated fill and disposing it offsite is projected to cost 11.3 million. This might sound like a lot of money, but compared to the money now spent on exploding chronic disease in our nation, it's chump change, an ounce of prevention.

As stated above, I belong to a growing group of local citizens who have reason to believe that the Navy should be responsible to protect the Public Health of former Host Communities. My children's future health could easily depend on this, I've little doubt that Rockland and Weymouth's children depend on this as well.

The Environmental Protection Agency has recently announced that Maximum Contaminant Levels(MCL) devised for the protection of Public Health, do not afford protection to children. Children are now believed to be ten times as susceptible, to contaminants, than the adults these MCL's were devised by. We insist that the health of our children be protected. As, thus far, 56 diagnosed cases of Multiple Sclerosis around the base(40 within 1 mile), have been substantiated, we must insist for the health of our children, that he Navy adhere to the most stringent clean up standards at this site. Anything less than complete cleanup is unacceptable. As we continue to delve further into the health of our neighborhoods, it is becoming increasingly evident that we have been saddled with a heavy health burden here. We insist on the Navy showing proper regard for the health of our children. The RDA Option 6 is the only way to show that regard.

**Thank you,
David Wilmot**

Arch
Abington, Ma. 02351

Mary A. Parsons
754 Union St.
Rockland, MA 02370
M1005@sprynet.com

March 22, 2003

Mr. Mark Krivansky, Navy Remedial Project Manager
U.S. Department of the Navy
Engineering Field Activity, northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

Subject: Comments to Proposed Plan Operable Units 2 and 9, Rubble disposal Areas

Dear Mr. Krivansky,

I am opposed to the Navy's preferred alternative RDA-5. I feel that in the long run, this alternative would be more costly than RDA-6. I would like to see all materials that were disposed of in the RDA and all PCB's and waste materials found in the adjacent wetlands permanently removed and disposed of at an offsite location and replaced by clean fill. By offsite location, I mean physically removed from the former NAS South Weymouth grounds and disposed of at an EPA and DEP approved licensed facility. I have serious concerns about capping this unlined CERCLA Site landfill. EPA has serious concerns about floodplain hazard in this area. I do not want to see this CERCLA Site combined with the West Gate Landfill Site and located at a new Site on the former NAS South Weymouth. I feel that removing all materials and disposing offsite, the Navy will save money, instead of having to fence the area from people using the Open Space. It will also save on 30 years of monitoring wells and gas vents.

This superfund site is geographically located in the Town of Rockland boundaries, and at some point in the future may come under the jurisdiction of the Town of Rockland. If the EPA signs off and the Navy goes forward with RDA-5, and this land is transferred to the South Shore Tri-Town Development Corporation, they will be subject to DEP regulations. I do not want to see another closed landfill with 30 years of monitoring in the Town of Rockland.

I am asking that the Navy do a much more extensive Ecological Risk Assessment, since mice containing PCB's were found. At the Public Hearing for Operable Units 2 and 9, Rick Sugatt of DEP informed the audience that the white footed mice that were tested had high levels of PCB's and were probably very sick. The Step 3 - Risk Characterization states, "This assessment further indicated no adverse effects on small birds or on larger animals, which are positioned higher on the food chain (e.g. fox, mink, and hawk)." What studies were done on hawks and other raptors (such as studies on reproductive organs and shells of newly hatched fledglings) to determine this? I hope this wasn't determined by

using a mathematical equation. Natural Heritage and Endangered Species Program should be contacted since state listed rare species wander this area and will need protection from construction vehicles. Certain dirt roads that served the Navy as perimeter guard posts should be shut down to motor vehicles and equipment to avoid a negative impact on these rare species. The method and routes to be use for removal of hazardous waste should be made available to the public so as to diminish infractions by contractors of the routes to be used.

I would also request that the contents of the material that was disposed of in operable Units 2 and 9, rubble Disposal Area be analyzed for the environmental effects to humans, plants and animals of chemicals combining with other disposed chemicals and becoming more potent.

Since the RDA is situated on a medium yield aquifer, I feel that the core of the RDA and the aquifer should be tested for disposed solvents and other chemicals related to air use at the former NAS South Weymouth. Also the RDA is located adjacent to Old Swamp River, which feeds into Whitman's Pond, a drinking water source for the Town of Weymouth. Any chemical that is above background level should be remediated by the Navy (including manganese and iron above background levels).

Marv A. Parsons

Mr. Mark Krivansky
Remedial Project Manager
US Department of the Navy
10 Industrial Highway
Lester, PA 19113-2090

RE: Proposed Plan, Operable Units 2 and 9, Rubble Disposal Areas, Naval Air Station
South Weymouth

Dear Mr. Krivansky

In their letter dated July 11, 2002 regarding the Draft Final Proposed Plan for the RDA, MADEP states in comment 3

"The statement indicating that potential risks were not predicted for human exposure to sediment or soil is misleading because, as explained in the Department's April 8, 2002 comments on the feasibility study report, the predicted risks to human health were based on an outdated, less conservative risk scenario than warranted by site conditions." The Navy's response to this, is "No response necessary. The feasibility study and remedial investigation report ... are final documents." If MADEP is suggesting that a more accurate risk scenario is warranted by site conditions, then why was it not incorporated into Draft Final Proposed Plan, as other comments have been? In light of the fact that MADEP twice made this comment, the Navy's statement that "Further, the Navy has considered the most restrictive exposure scenario..." fails to reassure me that the risks to human health could not have been more accurately predicted.

The Draft Final Feasibility Study for the Rubble Disposal Area at the South Weymouth Naval Air Station states in section 3.5.1 Overview of Site Conditions that the RDA "... is bounded on the east by a wooded and palustrine wetland, which slopes easterly from the edge of the landfill to Old Swamp River...". Please describe to me the method used for establishing the aerial extent of the RDA.

A walk along what is purported to be its eastern border, the edge of the wetland, raises serious questions about the accuracy of this delineation, especially as you follow this edge further south. Here it is apparent that the wetlands contain much more than vegetation. Huge chunks of concrete, scrap metal, and several 55-gallon drums in various states of decomposition are sticking up out of the wetland area, all well beyond the alleged "border" of the RDA. At least one of these drums in the wetlands contains a large quantity of an unknown solid substance. (see below for photos)

The Navy's assertion in its Proposed Plan for the RDA that "no tanks, transformers, or other large metallic objects have been observed at the site" may be judged an accurate statement only by virtue of the fact that the wetlands adjacent to the "site" have not been considered part of the RDA. Large metal drums are clearly observable in these wetlands, and their presence, along with that of the concrete, scrap metal, and other debris scattered

in the wetland suggest not only that the eastern boundary of the RDA was inaccurately drawn, but that there may be much more buried here than is easily visible.

The existence of rotting metal drums in the wetlands is of particular concern, as these wetlands drain directly into Old Swamp River, a Class A drinking water supply for the town of Weymouth. Discovery of this material in an area outside of what has up to now been considered the boundary of the RDA indicates a need for further evaluation of both the aerial extent of the site and its contents. Further soil sampling and risk assessments are also clearly indicated.

The Proposed Plan for the RDA states on p. 5, under Step 3-Risk Characterization, "...suggests the presence of PCBs in hydric soil in the wetland area poses a potential risk to small animals (e.g., mice). The assessment further indicated no adverse effects on small birds or on larger animals, which are positioned higher on the food chain (e.g., fox, mink, and hawk)."

If PCBs become more concentrated in the tissue of fish the further up one moves on the food chain, please explain why the same would not hold true for animals which feed on mice.

The Navy has consistently refused to consider testing private wells offsite, asserting repeatedly that there is no evidence that contamination has migrated off the base. Please remember that the Navy also contends that "no tanks, transformers, or other large metallic objects have been observed at the site". (See above, and attached photos that say otherwise).

I would hesitate to dismiss the possibility that contamination has migrated offsite. The flow of surface water and groundwater cannot be used to predict the flow of water in bedrock. For this reason the Department of Defense, at the request of the town of Hingham's Health Department, authorized the testing of approximately one hundred private wells in Hingham after the closure of the Army's facilities in Wompatuck State Park. Over thirty separate tests were conducted on each well, and the citizens came away secure in the knowledge that their water was safe to drink. The Citizens of Abington, Rockland, Weymouth and Hingham close to the Naval Air Station who draw their drinking water from private wells deserve the same consideration. I urge the Navy to follow the precedent set by the DOD in Hingham, and test the wells of any citizen within a mile of the base fence.

The incidence of cancers and non-cancerous diseases in the area surrounding the South Weymouth Naval Air Station is nothing less than alarming. Of fifty-seven documented cases of MS in the area, forty live within a mile of the base fence. I believe strongly that for whatever reason this may be, whether or not the staggering trail of dots that people are beginning to connect lead to the Navy's doorstep, the Navy has a moral obligation to do all in their power to prevent this situation from growing any worse. While potential risks to human "receptors" (we call them husbands, wives, sons, and daughters) are calculated for individual chemicals, little is known about their collective and cumulative effects. It is entirely possible that chemicals present at a site (e.g., manganese, lead arsenic, and benzo(a)pyrene) individually exist at concentrations that pose no perceptible

risk to humans, but their combination with each other, or with other substances found at the site may trigger a response of disease.

In addition, the Navy's failure to adequately define the boundaries of the RDA, or to accurately describe its contents unfortunately casts suspicion on the balance of their findings as well as on the conclusions they have drawn from the data they did collect.

For these reasons, it is my opinion that the Navy needs to reconsider its preferred alternative (RDA-5) for remediation of Operable Units 2 and 9, the Rubble Disposal Area at the South Weymouth Naval Air Station. Removal of PCB-contaminated soil and capping the remainder of this landfill without the removal of every possible source of this contamination affords the public with less than optimal protection from the hidden hazards of this site.

By far the alternative that presents the least risk to public health over the long term is RDA-6. I strongly urge the Navy to remove all disposed materials at the RDA and soil and sediment containing PCBs and dispose of them offsite.

Respectfully yours,

Mary Byram
5 Abington Street
Hingham, MA 02043-4301

We Welcome Your Comments!



Please use this space for comments:

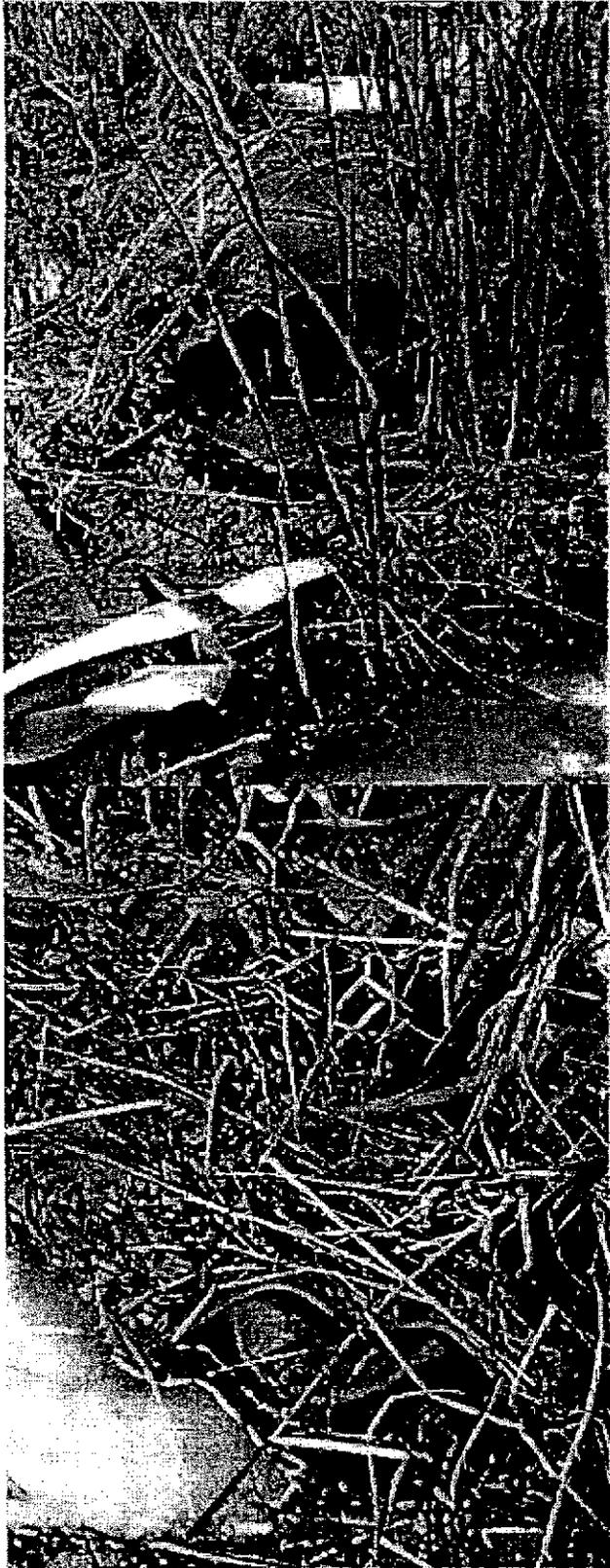
I believe Alternative
Remove all dispersed
at RPA and Soil and
Containing PCBs and
off site, so the
you can be sure that
the contaminated soil
positively be removed.
This is the only way
can insure no contamination
will be spread from the
site!

Comments submitted by:

Harvey Welch

Address:

674 Pond St
Weymouth, M.A. 02190



We Welcome Your Comments!

What is a Remedial Action?

Remedial Action is the process of removing or neutralizing contaminants in the environment to protect human health and the environment. It is a key part of the Superfund program.

The Superfund program is a federal program that provides financial assistance to states and localities for the cleanup of hazardous waste sites. It is a key part of the Superfund program.

The Superfund program is a federal program that provides financial assistance to states and localities for the cleanup of hazardous waste sites. It is a key part of the Superfund program.

What is a RIA?

A Remedial Investigation (RI) is a study to determine the nature and extent of contamination at a site. It is a key part of the Superfund program.

Please use this space for comments:

DEAR MR. EPSTEIN:

I ENCOURAGE THE NAVY TO CHOOSE ALTERNATIVE
PDA TO REMOVE ALL DISPOSED MATERIALS AT THE PDA
AND SOIL AND SEDIMENT CONTAINING PCBs AND DISPOSE
OFF SITE.

THIS IS THE ONLY SOLUTION THAT MAKES SENSE.
THE REST ARE JUST PATCH-UP SITUATIONS.

Comments submitted by:

Linda May Ellis

LINDA MAY ELLIS

Address:

65 UNION ST

ROCKLAND, MA 02370

FROM: KEN HAYES, 14 RUSSELL RD., S. WEYMOUTH MA 02190
RAB MEMBER

TO: MR. MARK KRIVANSKY
NAVY REMEDIAL PROJECT MANAGER

RE: PROPOSED PLAN FOR THE RUBBLE DISPOSAL AREA, NAVAL AIR STATION
SOUTH WEYMOUTH, MA.

The preferred alternative proposed by the Navy as RD-5 is an unacceptable alternative and this is why:

The disposal area is part of the wetland area that feeds the old Swamp River. We know that PCB's have been found at this landfill; and there might be a link to beryllium, found in the sediments of Weymouth's Whitman's Pond and in the land fill. Water from the disposal area feeds into Whitman's Pond - down the old Swamp River - which is part of Weymouth's potable water supply. The capping of this disposal area would not address the seasonal vertical movement of water in the landfill and the possible release of unknown compounds to the ground water and hydric soils underlying the disposal area and surrounding wetlands that feed the Swamp River.

The only alternative the Navy has looked at that would satisfy me and the town's people I've talked with, including several town councilors is RDA - 6 removal off site of all disposed of materials and contaminated soil and sediment from the rubble disposal area. Without this alternative the headwaters of the old Swamp River will always be suspect as to what chemistry from the landfill may be in the river that feeds our drinking water.

In Summary: Alternative RDA-6 - removal of all disposed materials at the RDA and soil and sediment containing contamination and dispose off-site. This is Weymouth's only alternative to assure old Swamp River's headwaters be protected from future possible releases of chemistry into Weymouth's drinking water. The disposal area should be allowed to revert back to the wetland it once was.

cc: The Patriot Ledger



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133-1053

SENATOR MICHAEL W. MORRISSEY

NORFOLK AND PLYMOUTH DISTRICT

ROOM 413D

TEL. 617-722-1494

FAX 617-722-1055

E-Mail: MMorris@senate.state.ma.us

Mr. Mark Krivansky
Remedial Project Manager
U.S. Department of the Navy
10 Industrial Highway
Lester, PA 19113

COMMITTEES:

GOVERNMENT RE
(CHAIR)

REDISTRICTING
(VICE-CHAIR)

WAYS AND MEANS

April 10, 2001

Dear Mr. Krivansky

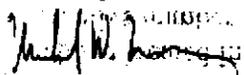
I am writing to you in regard to the Navy's withdrawal from the South Weymouth Naval Air Station located in the towns of Weymouth, Rockland and Abington Massachusetts. Of particular concern to myself and a great many of my constituents is the issue of the clean up of Operable Units 2 and 9, Rubble Disposal Areas which are located in the town of Rockland. It is my understanding that the Navy has decided to choose Alternative number 5 of the 7 possible Alternatives for clean up of these sites, which would be to remove soil and sediment containing PCB's dispose of them offsite and construct a soil cover on the site.

I am asking you to please consider using Alternative number 6 instead of number 5. Alternative number 6 calls for the removal of all disposed material, removal of soil and sediment containing PCB's and dispose of that material off site.

There are several reasons why I ask you to consider using Alternative number 6. First, this site will be a capped landfill located in an area that is intended to become a public recreation area, which will no doubt draw many children. The safety of children playing in that area is of serious concern to me. Second, this RDA site sits on the banks of the Swamp River, which is a drinking water supply to the towns in the area. There is a canoe ramp that is proposed to be located on this river, which would also allow children to access the site. Next, by leaving this site it will create a fourth landfill for the Town of Rockland, which is a small town. There have been PCB's found in the wetlands and lead arsenic, manganese and benzo-(a)pyrene. Finally by removing all contaminates from the area it will be a permanent solution rather than leaving the issue to be debated between the Town of Rockland and the Navy for years to come.

I appreciate your consideration of this matter. If you may be of assistance to you please do not hesitate to contact me.

Sincerely,


Michael W. Morrissey
State Senator

March 1, 2003

Mark Krivansky, Remedial Project Manager
U.S. Department of the Navy
Engineering Field Activity, Northeast

Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

RE: Operable Units 2 and 9, Rubble Disposal Areas
South Weymouth Naval Air Station
Weymouth, MA

Dear Mr. Krivansky

The Navy will be living up to its reputation if Operable Units 2 and 9, Rubble Disposal Areas are not removed.

Acknowledgment of responsibility is only a start.

It is alarming that the Environmental Protection Agency and the Department of Environmental Protection disagree with the timing and insufficient information completed. And it is most alarming that a local resident photographed a metal chemical barrel laying on the surface of the Rubble Disposal Area. The labeling of the barrel states: DSA 400-76-C-1197, Jefferson Chemical Co. Houston, TX 77052; Instructions for use - temperature of use, Warning - regarding vomiting; freeze and storage.

Why was this debris not mentioned? How many other barrels are there? What has leaked and for how long?

Testimony of local, long-term residence suggests that the South Weymouth Base RDA was used beyond four years. Were there any the dumping records kept by the Navy or trucking facilities?

I would like to see further Ecological Analysis such as ornithological shell samples from birds such as robins and possibly common prey birds. Also, I would like to see further Human Health Risk Assessment on combinations of chemicals found on the site such as PCB's, anti-freeze and other chemicals of concern.

I would like to see Natural Heritage directly involved in the Wetland cleanup and overview of the Species of Concern.

Alternative RDA - 6 should be provided. Pursuit of Alternative RDA - 6 is the only way to know for sure that all sources of contamination would be removed. It is the only alternative that would provide us with the protection we need.

There are far too many illnesses around the South Weymouth Naval Air Station for this to be neglected.

Respectfully,

Beth Sortin

Beth Sortin
185 Walnut Street
Abington, MA 02351



TOWN OF ROCKLAND

Board of Health

242 UNION STREET
ROCKLAND, MASSACHUSETTS 02370

TELEPHONE (781) 871-0154

March 25, 2003

**Mr. Mark Krivansky
Remedial Project Manager
U.S. Department of the Navy
10 Industrial Highway
Lester, PA 19113-2090**

Dear Mr. Krivansky:

The Rockland Board of Health Members at their regular schedule meeting on March 24, 2003 voted to send a letter endorsing the Alternative RDA-6 Remove all Disposed Materials at the RDA and Soil and Sediment Containing PCBs and Dispose Off-site.

The Board is aware of the health concerns surrounding the families living near the air base. We welcome any comments you might have, but please put Alternative RDA-6 into effect so this will help out the people in the immediate area of the landfill.

Sincerely,

Paul M. Mooney
Paul M. Mooney
Chairman

U.S. Department of the Navy

Philip F. Sortin
185 Walnut Street
Abington, MA 02351

March 25, 2003

Mr. Mark E. Krivansky, Remedial Project Manager
U.S. Department of the Navy
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

RE: Operable Units 2 and 9, Rubbish Disposal Area SWNAS

Dear Sir:

Cleaning the environmental hazards caused by the Navy should be a top priority of the Navy. Our country rebuilds nations that have been ravaged by war and dictators to the tune of billions of dollars while attempting to gloss over responsibility to the tax payer's citizens that live in the area of the SWNAS. The proposed plan to clean up a small area of PCBs and cap the rest is not acceptable especially in light of citizen testimony given at the hearing on the landfill. Photographic evidence shows a fifty-five gallon drum from a Texas chemical company covered by debris. Where there is one barrel there are more. Metal detectors will miss drums obscured by concrete with rebar and monitoring wells would only see ruptured drums. Capping the site will not prevent other drums from bursting and leaking toxic substances in the future.

One of the abutters to the site gave testimony that contradicts the Navy's end of use date which points to the fact that no valid records exist for the site.

Given the facts stated I insist the Navy do the right thing for the communities and use option six of the proposed clean up actions. I believe it's a small price to pay for the future of our union and its taxpayers.

Sincerely,



Philip F. Sortin
RAB member
Citizen and Taxpayer
Abington, MA



Rockland Open Space Committee

March 22, 2003

Mr. Mark E. Krivansky, Remedial Project Manager
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

Re: Comments on "Proposed Plan Operable Units 2 and 9, Rubble Disposal Areas Naval Air Station south Weymouth, Massachusetts"

Dear Mr. Krivansky:

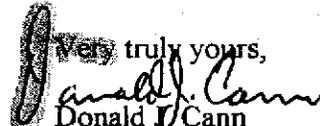
On behalf of the Rockland Open Space Committee, I am writing regarding the proposal to remove PCB-contaminated soil, cap, and restrict access to approximately four acres of open space at the former Naval Air Station within the Rockland Open Space area. This proposal is not acceptable to the committee as it renders the property in question unusable as open space and would violate the approved open space zoning concept for the base. It also permits the foreign objects and toxic substances to remain, posing continuing dangers to the water, soil, and air and, thus, to living creatures. The committee believes that the site needs maximum cleanup because of its proximity to the aquifer which requires protection under the base Zoning Plan. Our understanding is that the site is located partially on wetlands into which contaminated materials would leach.

It is anticipated that people of all ages will be making use of the open space areas at the base. It is unreasonable to expect that children will not be attracted to a "restricted" area that is surrounded by open space to which access is permitted. We are very concerned that liability for maintaining an attractive nuisance may attach if this area is not thoroughly cleaned and left open. In fact, the concept of "restricted open space" is oxy-moronic. Land which is to be obtained via a "Public Benefit Conveyance" is not a public benefit if it is not clean and usable. In addition, if the property in which the Rubble Disposal Area is to remain is in the perimeter where the Town of Rockland has permitting authority, we believe that the contents of the site would have to be removed entirely without a permit issuing from the Town.

Clearly, the only acceptable alternative proposed is RDA-6 in which all disposed materials and soil and sediment are removed and taken off-site. The removal of open

space from the open space area designated for the citizens of Rockland is not in keeping with the re-use plan as proposed. There has been no proposal to provide compensatory property to replace that which will be restricted and designated as hazardous.

Alternative RDA-5 is not an acceptable proposal for the treatment of the areas in question. The land, as it was originally acquired by the Navy, did not contain the materials and substances put there by the Navy and it should be returned to a state that does not contain those materials and substances.

Very truly yours,

Donald J. Cann
Chairman

CC: Rockland Board of Selectmen
242 Union Street
Rockland, MA 02370

Representative William Delahunt
1317 Longworth House Office Building
Washington, D.C. 20515

Representative Barney Frank
United States House of Representatives
Washington, D.C. 20515

Senator Edward M. Kennedy
Rm. 315 Russell Senate Office Building
Washington, D.C. 20510

Senator John F. Kerry
Room 304 Russell Senate Office Building
Washington, D.C. 20510

South Shore Tri-Town Development Corporation
223 Shea Memorial Drive
South Weymouth, MA 02190

**Town of Weymouth
Massachusetts**



David M. Madden
Mayor

75 Middle Street
Weymouth, MA 02189

(781) 340-5012
(781) 335-3283 FAX
(781) 331-5124 TTY

March 24, 2003

Mr. Mark E. Krivansky, Remedial Project Manager
U.S. Department of the Navy
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

Dear Mr. Krivansky;

The following are comments the Town of Weymouth would like to become included in the official record for the Rubble Disposal Area (RDA).

According to your Proposed Plan Pamphlet, there were no predicted human health risks, however, in your proposed plan (Alternative RDA-5), a fence and signage will be constructed around the entire site (approx. 4 acres) to warn trespassers away. This parcel of land is located within the delineated Public Benefit Conveyance (PBC) area, and therefore will remain as "open space" and could be utilized for such things as public parks. Why is a fence and signage required, and how could a fenced in parcel of land be defined as "open space" or land available for public use?

Could the Navy install thicker soil cover, and a geotextile membrane, to enable the property to remain accessible for public use and still allow for zero risk to human health and safety?

2. PCB contaminated soils have reached the adjacent wetland by some mechanism. You have proposed to install a soil cap over the site to meet the State regulations for closing a landfill. Will this cap effectively stop migration of any other possible PCB contaminated soils? Would you consider additional design investigation for constructing an impermeable barrier such as a concrete retaining wall to further add in preventing any contaminants from entering the wetland?

**Town of Weymouth
Massachusetts**



David M. Madden
Mayor

75 Middle Street
Weymouth, MA 02189

(781) 340-5012
(781) 335-3283 FAX
(781) 331-5124 TTY

3. Your plan will require monitoring, and site maintenance in perpetuity. If thirty years (30) into the future, elevated levels of contaminations are discovered, will the federal government still have funding to conduct cleanup activities, or will the Town of Rockland be forced to bear the burden of the cost?
4. During the public hearing the general comments from the public and the regulators were not in favor of your existing proposed plan. Will the comments that you receive, actually change the planned activities that the Navy will conduct?
5. We believe that implementation of institutional controls in the form of restrictive covenants (that restrict the use of groundwater beneath the site for human consumption, and restrict certain activities on the surface of the site), are essential in protecting human health and safety. It is imperative that these covenants be implemented in a fashion that is permanent and well defined.

Sincerely,

A handwritten signature in black ink that reads 'David M. Madden'.

David M. Madden
Mayor

March 25, 2003

Mr. Mark E. Krivansky, Remedial Project Manager
U.S. Department of the Navy
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

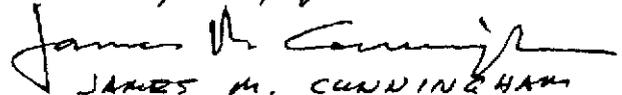
Re: Extension of Comment Period

Dear Mr. Krivansky:

This letter is to confirm the fact that today I spoke with you on the telephone, and requested an extension of the comment period for the proposed plan for the Rubble Disposal Areas at the South Weymouth Naval Air Station, and that you approved a fifteen day extension for the receipt of comments from all interested parties. I do know that other groups and individuals, including the Whitman's Pond Association, intend to submit comments.

Thanks you for extending this comment period.

Very truly yours,

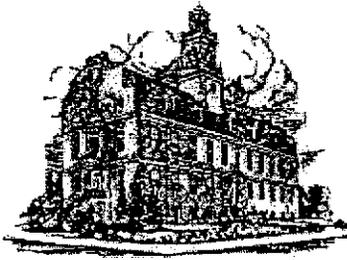


JAMES M. CUNNINGHAM
RAB CO-CHAIR, SWNAS
58 LAKE SHORE DRIVE
WEYMOUTH MA. 02189.

C: Dave Barney, SWNAS

Michael Smart
Councilor District Six

39 Rhitu Drive
South Weymouth, MA 02190
781-331-8844
SmartWey@aol.com



The Town of
EYMOUTH, MASSACHUSETTS



Chairman – Environmental Committee
Vice Chairman – Ordinance Committee
Parks and Recreation Committee
Public Safety Committee

March 21, 2003

Mr. Mark E. Krivansky, Remedial Project Manager
U.S. Department of the Navy
Engineering Field Activity, Northeast

Dear Mr. Krivansky:

Please accept this letter as my formal comment on the Proposed Plan for the Rubble Disposal Area, located at the former Naval Air Station in South Weymouth, Massachusetts.

On February 27, 2003, the Navy held a public meeting to discuss their proposed cleanup approach for the Rubble Disposal Area. At this meeting, the Navy provided a literature hand out and a slide presentation outlining the chemicals that were found in the RDA, as well as, a proposed remedy for the site. The cleanup proposal, which was recommended by the Navy, deals solely with the removal of the polychlorinated biphenyl {PCB}, the construction of a soil cover on the former disposal area, and long term monitoring and institutional controls.

Plan RDA-5 is not sufficient to completely eliminate the risk of human contact with the remaining chemicals left behind in the rubble disposal area such as lead, manganese, benzo {A} pyrene, and arsenic. The potential for these remaining chemicals to further contaminate the Old Swamp River, which contributes to the Town of Weymouth's secondary water supply, is a valid reason to require that all of the dangerous chemicals, that were not present before the Naval Air Base came into Weymouth, be completely removed.

In the Navy's proposed cleanup method, RDA-5, it is stated that this method would minimize the impacts solely to the adjacent wetland area. This clearly is not reassuring to the residents who drink Weymouth water and those who live nearby in the Tri-Town area. Further, the recommendation of installing monitoring devices and institutional controls in the RDA area leads me to believe that the United States Navy expects that there will be future problems with contaminants at this site.



Fogg Library

It is my request that the Navy consider the proposal plan numbered, RDA-6 in the Navy's Proposal Plan booklet dated February 2003, as the method of cleanup for the Rubbish Disposal Area. This plan would completely remove all infected material from the RDA and dispose of it at an off site location. This would certainly eliminate all risk of human and ecological contact with contaminants from the site.

Sincerely,

A handwritten signature in black ink that reads "Michael Smart". The signature is written in a cursive style with a long horizontal stroke extending from the end of the name.

Michael Smart
Councilor District Six

We Welcome Your Comments!

What is a Formal Comment?

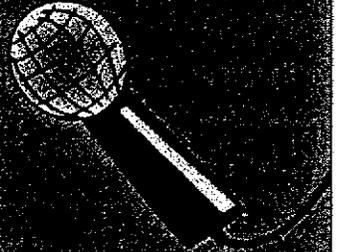
Formal comments are written comments received during the public comment period. All comments received during this period will be reviewed. While the EPA uses comments submitted during this period to make decisions, it is not required to respond to all comments.

Formal comments can be submitted online or by mail. To make formal comments online, please go to www.epa.gov/epahome/epaform.htm. For comments by mail, please send comments to: Director, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, NW, Washington, DC 20460. For more information, please call 1-800-452-5311.

All formal comments will become part of the official record of the RDA. This record will be used in the decision-making process for the RDA. The NEW will be made available to the public during the comment period prior to making the final decision on the RDA.

Use this form!

The NEW encourages your written comments on the Proposed Plan for the RDA in the South/West portion. You can use the form below to send written comments. If you have questions about how to comment, please call Mark Kivany at (610) 595-9557 ext. 168.



Please use this space for comments:

Whether the US/AR Station is developed - for example, turning it into a park paying for environmental OR

(Cleaned up enough for long-term usage by human beings.)

Should ONLY depend upon human ability to cleanse an environment for the continued health and prosperity of its most affected people surrounding the Air Station -
Clean - Air, Land, and Water!

Must use Alternative RDA 6

Comments submitted by: Yvonne A. Hager, Weymouth, RAB

Address: 16 Bates Ave
S. Weymouth MA 02190

The Wagoner

A. Robert Casimiro, 617 Broad Street, Bldg. 10-10, East Weymouth, MA 02189
Tel. 781 340-5429, e-mail arccasimiro@mas.com

March 26, 2003

Mr. Mark E. Krivansky
Remedial Project Manager
U.S. Department of the Navy
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

Dear Mr. Krivansky:

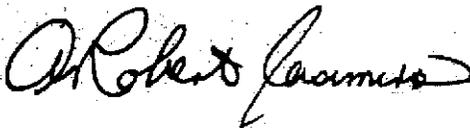
South Weymouth Naval Air Station Cleanup

I am in favor of RDA 6; Remove all Disposed Material at the RDA and Sediment Containing PCBs and Dispose Off Site.

We get some of our drinking water from Whitman's Pond, which is fed by the Old Swamp River, which is part of the watershed of the South Weymouth Naval Air Station.

We believe the only way to safeguard the health of our residents is for all of this material to be removed from the site.

Regards,



Distribution:

Mr. Lorraine Larrabee, President Whitman's Pond Association 100 Westminster Road Weymouth, MA 02189	
--	--

One Deerfield Road
Hingham, MA 02043
April 4, 2003

Mr. Mark Krivansky, Remedial Project Manager
U.S. Department of the Navy
10 Industrial Highway
Lester, PA 19113-2090

Dear Mr. Krivansky:

I feel the Navy's proposed cleanup approach for the Rubble Disposal Area at the former South Weymouth Naval Air Station, Alternative RDA-5, would not adequately alleviate the potential risk to human health or the environment.

Many individuals who live within a close proximity to the base have experienced significant health problems. Although no studies confirm these illnesses were caused by contamination on this site, one can only surmise.

I strongly urge the Navy to perform a complete and thorough cleanup of the South Weymouth Naval Air Base and return this property back to the communities in the condition in which it was received.

Sincerely,



Betty Gibbons

Mr. Mark E. Krivansky, Remedial Project Manager
U.S. Department of the Navy
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

March 24, 2003

RE: Disposition of the Rubble Disposal Areas at the Naval Air Station South Weymouth, Massachusetts

Dear Mr. Krivansky:

As the Community Co- Chairman of the South Weymouth Naval Air Station Restoration Advisory Board (RAB), I have spoken with the RAB members, and the majority endorse **Alternative RDA-6: Remove All Disposed Materials at the RDA and Soil and Sediment Containing PCBs and Dispose Off-site**, rather than Alternative RDA-5, as proposed.

I. It makes no sense to remove a small portion of contaminated wetland soil and cap the bulk of the RDA material, when at high water the Old Swamp River washes under the RDA in places, and will leach out contaminants into the river. The Old Swamp River is a primary source of potable water for the Town of Weymouth. Old Swamp River flows directly into the South Cove of Whitman's Pond, and up to one-half of the town's water is pumped directly from there to the drinking water reservoir.

The RDA constitutes an unknown risk to Weymouth's water supply. Mice caught in the area were found to have excessively higher levels of PCBs than test borings should indicate, therefore leading to the possible conclusion that PCBs, and possibly other contaminants, are lodged in and under the rubble of the RDA. It is highly likely that these small animals can move about in the interstices between pieces of rubble in places not evaluated through test boring, and it is certain that groundwater and maybe surface water washes into these spaces, and then into the river. There is no easy way to isolate the wetland from the river during high water flows. The RDA lies within the Aquifer Protection District (Medium Yield). According to the "Zoning and Land Use By-Laws for the Naval Air Station South Weymouth", dated March 24, 1998, no landfills are allowed within a water resources protection overlay district (WPD), which is the location of the RDA as shown on Exhibit B, Water Resources Overlay Map. Therefore, by prior agreement, the Department of Defense (DoD) should remove the RDA in its entirety.

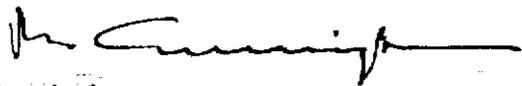
II. If Alternative RDA-5 were adopted, the cap above the RDA would not be consistent with open space, as is the intention for this area of the base. Also, the fence around the capped area would restrict wildlife habitat, and provide an attractive nuisance to children playing in the area. Also, it is unknown what types of contaminants could leach out from the RDA and affect people and wildlife in the nearby area.

Alternative RDA-5 requires continuous monitoring for many years. During that time, if undiscovered contaminants were to surface, the cost of opening the landfill and removing the contamination could easily exceed the present cost of total removal. Certainly, close monitoring for several years will prove to be an increasing expense, which could be eliminated in advance by performing Alternative RDA-6. Under Alternative RDA-5, the soil cover could be eroded by heavy rain, and surface water would then wash exposed contaminants into the river. It is entirely possible, even though the initial cost may be less, that Alternative RDA-5 may prove to be more expensive than Alternative RDA-6. The cost of RDA-6 is now known, and funds are more likely to be available now than in the future. It makes more sense to deal with the problem now, once and for all, rather than exposing all parties to continuing expense and possible ecological disaster.

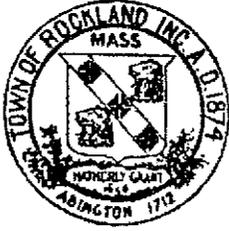
Pictures of the RDA shown at the public hearing show that very little vegetation has grown on this landfill; this leaves us to speculate that the reason for this is that the area is so heavily polluted that not much can grow there. After the cap is in place, the concept of open space will be defeated. It is highly unlikely that only 54 cubic yards of contaminated soil is present in the wetlands near the RDA. Recent photographs taken by concerned citizens show previously unknown chemical drums rusting into the water. Since the RDA was a landfill, it is quite possible that more than 54 cubic yards of soil may be found to be contaminated. All should be removed.

III. In conclusion, the members of the RAB are very interested in protecting the natural ecology of the Naval Air Station, especially water. In order to insure that the RDA does not continue to threaten the Old Swamp River and Weymouth's drinking water, as well as restoring the RDA to its former woodland/wetland open space, all the rubble and contaminants at the RDA should be removed and disposed of off-site, as outlined in Alternative RDA-6.

Respectfully,



James M. Cunningham
Community Co-Chairman
SWNAS-RAB
58 Lake Shore Drive
Weymouth, MA 02189-1506



Rockland Conservation Commission

242 UNION STREET
ROCKLAND, MASSACHUSETTS 02370
(781) 871-0596

April 3, 2003

Mr. Mark Krivansky
Remedial Project Manager
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19913-2090

Re: Public Hearing, Naval Air Station, South Weymouth, MA

Dear Mr. Krivansky,

The Rockland Conservation Commission voted at our March 27, 2003 meeting to recommend the "Alternative RDA-6: Remove All Disposed Materials at the RDA and Soil and Sediment Containing PCB's and Dispose of Off-Site". The Board requests you file this recommendation as the Board's official position on this matter.

If you have any questions, please feel free to contact me.

Sincerely,

Gerald DelPrete, Chairman
Rockland Conservation Commission

CC: Rockland Board of Selectmen

Mr. Mark Krivansky
Remedial Project Manager
US Department of the Navy
10 Industrial Highway
Lester, PA 19113-2090

Proposed Plan
Operable Units 2 and 9, Rubble Disposal Areas
Naval Air Station South Weymouth

Dear Mr. Krivansky,

The following are my comments on the Proposed Plan for the RDA.

In light of the fact that the RDA sits on the banks of Swamp River, a Class A drinking water supply for the Town of Weymouth and the fact that the RDA is in an Open Space zoned district which will lure thousands of children of all ages to play in the surrounding recreational fields, trails, picnic areas and a canoe launch less than 100 feet away, and in light of the fact that the Navy really is clueless of knowing exactly what is contained in the RDA that may present a potential environmental, human health or ecological problem at any time:

I urge and request that the Navy choose Alternative RDA-6: Remove All Disposed Materials at the RDA and Soil and Sediment Containing PCB's and Dispose Off-site.

I do believe that the Navy should thoroughly investigate the RDA to a point where they can GUARANTEE that there will be no Human health risk. I believe our communities, with all the health concerns currently surrounding the SWNAS, deserve more from the Navy than a prediction that there will be no human health risk.

This comment from the DEP to the Navy in a letter dated July 11, 2002 regarding the RDA is very concerning to me. It states

"The statement indicating that potential risks were not predicted for human exposure to sediment or soil is misleading because as explained in the Department's April 8, 2002 comments on the feasibility study report, the predicted risks to human health were based on an out-dated, less conservative risk scenario than warranted by site conditions".

This is an alarming issue that will be reviewed more thoroughly.

I hope the Navy, in their PREDICTIONS of risks to human health, is using the latest, most conservative risk scenarios to protect the health of their neighbors of 60 years and the generations of children that will be using this area for their recreational needs for years to come.

Toxicity Assessment- As stated in the Proposed Plan on page 3, "possible harmful effects from exposure to the individual chemicals of potential concerns are evaluated. ----The

Navy should also look into the possible harmful effects from exposure to a combination of these chemicals of potential concern? This should be evaluated as well.

Please use the unofficial reports that transformers, transformer components, or transformer fluids were disposed of at the RDA as OFFICIAL reports that they were disposed of at the RDA. The PCB's found at the site are consistent with the type of PCB's found in transformers. Please have someone do the math. Otherwise explain how the PCB's got there.

The Navy is correct to say that no tanks, transformers, or other large metallic objects have been observed at the site, if of course they were only looking to see if any were sticking out of the tall grass and shrubs. What the Navy did not mention is the fact that there are radiators, aircraft debris, a large electric motor, an intact 55 gallon drum with writing on it saying Texas Chemical, another 55 gallon drum with a solidified unknown in it, and a host of other rusting drums sitting at the waters edge of the RDA as I and others have witnessed. How can the Navy miss these objects in their RI? Why was this information not in the Proposed Plan so the public could properly comment?

PCB's - The Navy has estimated the total volume of soil containing PCB's at 54 cubic yards at the RDA. Prior estimates by the Navy after testing, have historically underestimated the amounts of soil containing PCB's. For example: In RIA-8, the Navy estimated there would be 8-10 cubic yards of soil containing PCB-s that needed to be removed. In reality, the Navy actually removed 210 cubic yards of soil containing PCB's at the site and needs to do more testing. That being said, especially because there was no soil test for PCB's done up gradient from the wetland edge, the Navy may very well be off the mark again.

Four chemicals - I believe the Navy should have included in the Proposed Plan, just how high were the chemicals found to be above background levels and why they might be that high. For example, the very large hits of manganese. Also please explain the human health risk of a child exposed to the "expected residual levels" of the base-wide applications of pesticides. Do background levels of pesticides found on the base necessarily mean they are not a health risk to children?

Ecological Risks- The Ecological Risk assessment is seemingly misleading because the Navy did not actually test the receptors evaluated in this assessment other than mice, which had high concentrations of PCB's. To better evaluate and take the guesswork out of the Navy's estimations, I believe the Navy should directly include tissue testing in their lab studies of small mammals, rabbits, earthworms, plants and wetland life and invertebrates in contact with surface water and sediment at the RDA. This would leave us with a more accurate assessment.

Risk Analysis- Risk Analysis is based on the Navy estimating the amount of chemical in soil, aquatic media, plant or animal tissue.

Again, the Navy historically does not have a good track record for estimating PCB's in soil. Therefore the Risk Analysis is likely not to be accurate. In reality, the Assessment is likely to have adverse effects on animals higher in the food chain. Please put more effort in finding the factual results and less effort in estimating results.

Attached is a historic wetland map of the SWNAS from 1940. On it you will see that a portion of the RDA has filled the wetlands along the banks of Swamp River. Because the landfill rests atop of wetlands and inside a floodplain, in my opinion, using Alternative # 5 (capping the landfill) would not be effective due to the fluctuating ground and surface water levels beneath it. This is most likely the reason why the PCB's are in the wetlands in the first place. The Navy should prove to the communities that this would not be the case or otherwise they should choose Alternative #6.

The RDA also rests atop of a medium yield aquifer, which is a potential drinking water supply or may be used to irrigate recreational fields. In the zoning and land use bylaws for the SWNAS, a medium yield aquifer is protected by an Aquifer Protection District. According to the bylaw, a landfill is a prohibited use in the Aquifer Protection District. Bylaw is attached.

DEP comment letter on July 11, 2002 to the Navy states, "Alternatives that involve removal or relocation of the site (RDA-6 and RDA-7) provide superior protection of human health and the environment and superior long-term effectiveness compared to other alternatives (which do not entail complete removal of the site)". ---Please give this comment more consideration.

Alternative # 5 undermines this project as being a model project for the rest of the Commonwealth as requested by the Secretary of Environmental Affairs. Picnic areas, canoe launches and trails abutting capped landfills would not be considered part of a model project for future development practices in the Commonwealth.

The Town of Rockland does not need the burden of chasing the US Navy for the next 200 years to repair problems associated with a 4 acre capped landfill, including being a permanent security guard to thwart children from digging, catching amphibians, chasing balls etc in the RDA.

Burrowing animals in the landfill would deem the cap ineffective by allowing rainwater to wash contaminants into the groundwater and into Swamp River.

Alternative # 6 is more cost effective in the long term with no cost of maintenance, mowing, erosion repairs, monitoring, etc. It is a better investment for our tax dollar not only financially, but for peace of mind for parents knowing their children will be safe from toxic contaminants in an area that will be used for recreational purposes and for citizens of Weymouth who will be assured that there are no toxic contaminants leaching into their drinking water supply from the base.

History shows us the slow pace of remedial work at the SWNAS and that it is caused by a lack of funding and the time it takes to appropriate funding to clean-up the base, which is

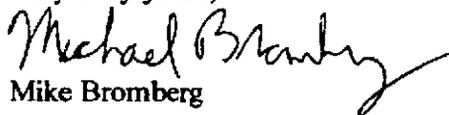
the reason for the Navy's desire for an Early Transfer. This is while there is a Navy presence and an established BRAC team.

In the near future when the Navy and the BRAC team is not present and there are problems at the RDA that may affect human health and the drinking water supply, it may take years and years for the Navy to retain funding to remedy the problem. In the meantime our children's health is at risk and the contamination of the drinking water supply is at risk. We cannot afford these risks as we wait years for the Navy to remedy the problem. Guarantee us there will be no risks by removing the landfill.

Also, the Navy should complete its testing of the feeder stream just south of the RDA which originates from the East Mat and address any problems with it before it begins any remedial work on the RDA. This feeder stream is associated and connected with the floodplain and wetlands abutting the RDA.

Again, I urge and request the Navy not to gamble with our lives and to choose Alternative # 6.

Very truly yours,


Mike Bromberg

**Zoning and Land Use By-Laws for NAS South Weymouth
As Approved by the Naval Air Station Planning Committee on March 24, 1998
Executive Summary**

1. GENERAL PROVISIONS

The purpose of the By-Laws is to govern land development activities at the former Naval Air Station (NAS South Weymouth) in conjunction with the Reuse Plan and the Regulations adopted pursuant to the By-Laws. The By-Laws and the Reuse Plan are integrally related.

2. The By-Laws contemplate that regulations will be adopted (after notice and public hearing) to contain more detailed land use controls with respect to application procedures for special permits, subdivision control standards, watershed and water resource protection standards, and other matters.

The By-Laws established zoning controls and other land use regulations which are consistent in scope with similar regulations in Massachusetts's municipalities.

2. ADMINISTRATION OF THE DEVELOPMENT OF NAS SOUTH WEYMOUTH

Section 2.1 describes the composition of the Development Corporation and the procedures by which it holds meetings and conducts its business.

Section 2.2 describes the Central Redevelopment Area and the Perimeter Areas, into which NAS South Weymouth is divided. It provides for the administration and enforcement of the By-Laws within the Central Redevelopment Area by the Corporation, with the assistance of the Land Use Administrator. It provided for the administration and enforcement of the By-Laws in the Perimeter Areas by the applicable Town Board, with the assistance of the local Building Inspector. The powers of the Corporation and of the applicable Town Boards are listed in Sections 2.4 and 2.5.

3. DEFINITIONS

This Article includes many of the defined terms used in the By-Laws. Additional defined terms are included in Article 6 (relating to Uses) and in Article 8 (relating to Dimensional Standards).

4. ESTABLISHMENT OF ZONING DISTRICTS

This Article describes the zoning districts located in the Central Redevelopment Area and in the Perimeter Areas, and defines the purpose of each district.

5. ESTABLISHMENT OF WATER RESOURCES PROTECTION OVERLAY DISTRICTS

This Article establishes an Aquifer Protection District, which includes the potential medium and high yield aquifers on the base and the wetland on the base. This Article provides limitations on certain uses in the Water Resources Protection District.

6. REGULATION OF USES

This Article includes definitions of the various uses which are permitted as NAS South Weymouth, and references the Table of Permitted Uses, attached as Exhibit E, which sets forth the specific uses which are permitted in the specific Zoning Districts.



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 U.S. GEOLOGICAL SURVEY
 WASHINGTON, D. C. 20540
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 Weymouth, Mass.
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 Weymouth, Mass.
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664A
 Weymouth, Mass.
 Harvard

03/27/03 17:04 FAX 8172483870

KERRY BOSTON

JOHN KERRY
MASSACHUSETTS

COMMITTEE:
COMMERCE, SCIENCE,
AND TRANSPORTATION
FINANCE
FOREIGN RELATIONS
SMALL BUSINESS

United States Senate

WASHINGTON, DC 20510-2102

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages - 1

To <i>Alexandra Stanley</i>	From <i>Mark E Kivanoky</i>
Depl/Agency <i>ETA/ Gov. Services</i>	Phone # <i>6105950567</i>
Fax # <i>508888 6689</i>	Fax # <i>6105950555</i>

One Bowdoin Square
Tenth Floor
Boston, MA 02114
(617) 565-8519

March 27, 2003

Captain Mark Ferguson
Director, Senate Liaison Office
Department of the Navy
182 Russell Senate Office Building
U.S. Senate
Washington, D.C. 20510

Dear Captain Ferguson,

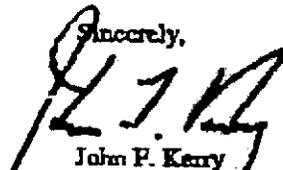
I am forwarding to you a copy of a letter from Mr. Mike Bromberg concerning his request for assistance in looking into the Navy's proposal for the Naval Air Station at South Weymouth, Massachusetts.

It is the desire of this office to be responsive to all inquiries and communications. I respectfully ask for your assistance in resolving the issues outlined in the attached correspondence.

Please convey a copy of your response to the issues raised in Mr. Bromberg's letter to Meaghan F. Hohl of my Boston office.

I thank you for your cooperation in this matter.

Sincerely,



John F. Kerry
United States Senator

JFK/mfh

Send John Kerry letters and e-mails to John.Kerry@senate.gov
www.johnkerry.com
PRINTED ON RECYCLED PAPER

03/27/03 17:04 FAX 0172403870

KERRY BOSTON

3/27/03

Dear Senator Kerry,

This letter is in regards to the Proposed Plan for Operable Units 2 and 9, Rubble Disposal Areas, Naval Air Station South Weymouth. Rubble Disposal Area = RDA
 It is a 4 acre Superfund Site that is open to public comment. The comment period was extended until April 11, 2003. The Navy provided 7 alternatives for a clean-up approach to comment on. The Navy has chosen Alternative #5: which is Remove Soil and Sediment Containing PCB's, Dispose offsite and Construct a Soil Cover over the site.

I encourage you ask the Navy to consider Alternative RDA# 6: Remove All Disposed Material at the RDA and Soil and Sediment Containing PCB's and Dispose Off-site, for the following reasons,

- 1) It is a Superfund Site in Rockland. Rockland is a small town already containing 2 landfills. The Navy decided to leave Rockland with a third landfill called the Small Landfill. The RDA would be a fourth capped landfill for the town if the Navy is allowed to leave it.
- 2) The Navy filled in wetlands abutting Swamp River to create this 4 acre landfill.
- 3) The RDA sits on the banks of Swamp River.
- 4) Swamp River is a Class A drinking water supply to the Town of Weymouth.
- 5) The Navy has chosen to leave our community with a capped 4 acre landfill with unknown toxic contamination lying beneath it.
- 6) The RDA sits in an Open Space Zoned District, which will lure thousands of children to use the recreational fields, picnic areas, trails and a canoe launch planned in and around the landfill.
- 7) The canoe ramp will be built within 100 feet of this capped landfill, which leaves the potential for
 kids to access the landfill from the water.
- 8) The Navy has found PCBs in the wetlands and lead, arsenic, manganese and benzo-(a)pyrene in the
 groundwater. All unhealthy contaminants.
- 9) The Navy has not yet completed its Base-wide Watershed Assessment to determine all the effects of
 contamination on the Base.
- 10) The Navy has not disclosed the fact that there are 55 gallon drums decaying on the banks of the
 RDA.
- 11) The Navy's Alternative # 5-Capping option- I don't believe that capping the landfill can prevent further contamination of the groundwater where the landfill sits inside a wetland and floodplain with fluctuating ground and surface water levels beneath it. Contaminates will still be drawn to the water.
- 13) The RDA sits atop of a Medium Yield Aquifer, which is a potential drinking water supply or could be used to irrigate recreational fields. The South Shore Tri-

Town Development Corp. is seeking all alternatives to provide a water source to the Redevelopment of the Base. Difficult to use the aquifer with a Superfund site resting directly atop of it with unknown disposed materials in it.

- 14) The Re-Use Plan zoning bylaws require an Aquifer Protection District for any potential medium or high yield aquifer.
- 15) A capped landfill is not permitted in an Aquifer Protection District in the Re-Use bylaws.
- 16) Our communities do not want a capped landfill on permanently protected open space.
- 17) If the Navy uses Alternative #5 and there are problems with the RDA after the Navy is gone, we have no guarantee when the Navy will be back to correct the problems. Our communities do not want to wait while the Navy looks to have funds appropriated for additional remedial work in the future while at risk is our children's health and Weymouth's drinking water supply.
- 18) The Navy should return the land in the same condition as it acquired it.
- 19) What parent would allow their children to use the open space and recreation fields knowing they could be at risk of endangering their health.
- 20) What parent would gamble their children's health on the Navy (predicting) there will be no health risks associated with the RDA after it is capped? We now need guarantees, not predictions.
- 21) Rather than removing the RDA, the Navy wants to put institutional controls in place at the RDA and the aquifer beneath it.
- 22) There are unofficial reports that transformers, their components and their fluids were disposed of
in the RDA. The Navy estimates there will be 54 cubic yards of PCB contaminated wetland soil to remove.
- 23) DEP comment letter on July 11, 2002 to the Navy states "Alternatives that involve removal or relocation of the site (RDA-6 and RDA-7) provide superior protection of human health and the environment and superior long-term effectiveness compared to other alternatives (which do not entail complete removal of the site).

Lastly, at this time there are several Health Studies by the Mass. Dept of Health in the process. The studies are concerning the high amount of diseases, mostly a MS cluster, cancer etc. surrounding the Naval Air Station. I received a call just this morning that another abuter of the base was diagnosed with MS yesterday. That brings the count of people with MS around the base to 57 in just a couple months search by private citizens. This is very alarming.

I ask for your help in asking the Navy to remove this landfill and dispose of offsite. I believe it is an injustice to our communities to let the Navy walk away from the base leaving capped landfills that will jeopardize the health of our children and the drinking water supply to the Town of Weymouth.

03/27/03 17:04 FAX 6172403870

KERRY BOSTON

20

Please address comments to

Mr. Mark Krivanaky
Remedial Project Manager
US Department of the Navy
10 Industrial Highway
Lester, PA 19113-2090
Or email to: krivanakyme@efanc.navfac.navy.mil

Thank you for your consideration

Mike Bromberg
373 Forest St
Rockland, Ma, 02370
781-681-9816

WHITMAN'S POND ASSOCIATION
A DEDICATED, ENVIRONMENTAL, NONPROFIT 501©3, CIVIC GROUP

April 8, 2003

Mr. Mark E. Krivansky
Remedial Project Manager
U.S. Department of the Navy
10 Industrial Highway
Lester, Pa 19113-2090

Dear Mr. Krivansky:

As President of Whitman's Pond Association, along with a 100% vote from the Association's members who attended our March meeting, **we take a firm stand in favor of Option #6 and consider Option #5 as being tenuous and totally unacceptable.**

The following is an attempt to both exhibit my genuine concerns on this matter, and substantiate why Option #6 will support each of them, and why **Option #5 belongs with the rest of the trash.**

There should **not** be a doubt in anyone's mind as to the process used in removing the rubble from the Naval Base in South Weymouth—**there's too much at stake!** However, the debates continue as to (a) whether the rubble should remain buried underground, once the U. S. Navy vacate the Base, Option #5, or (b) whether all of the debris should be dug up and carted away, Option #6.

Any method other than Option #6, is an indication that **Weymouth, Rockland and Abington are in danger of loss that can never be replaced.** I'm sure you are aware of the serious Autoimmune system diseases within our Tri-town, which continue to multiply. **Since they are suspected of being linked to the contamination at the Naval Base,** there should be no question as to which option is required. – Option #6, of course. These serious health issues command this thorough rubble removal process in attempt to safeguard future illness. It also assists in eliminating the gamble of health risk, which Option #5 represents.

To further complicate matters, Old Swamp River flows through a stretch of the Naval Base, and travels its path into the South Cove basin of the Pond. Water from South Cove is pumped to Great Pond, supplying Weymouth with approximately 40% to 45% of its drinking water. However, rubble buried underground the Base will remain a threat of contamination until it is totally removed, as Option #6 proposes. **Option #5's proposal simply postpones the inevitable.**

I'm sure the **cost factor plays a huge role in it.** However, wouldn't you think that even the slightest possibility of jeopardizing the health and welfare of both the Tri-Town residents and Whitman's Pond would **take precedence over the cost issues involved to safeguard them?**

Please keep in mind, **water is at a premium—its availability continues to decrease.** Many states have been stricken with severe drought conditions. Unfortunately, these conditions have worsened during this past year, and are predicted to continue in a negative direction. **Isn't this reason enough to protect our precious water resources that Whitman's Pond provides?**

I believe the testing that was recently done to determine the severity of contamination found, was only done on the Base. If so, those tests will not supply and support the complete information required to determine the extent of contamination and its derivatives that filter into Old Swamp River. Surface water and sediment testing downstream Old Swamp River, and also in areas of Old Swamp close to and adjacent to the Naval Base, should have been declared mandatory areas of testing. Also, research on prior studies of this River should have been declared mandatory as well.

Following are test results performed on Old Swamp by Beta Group in the year of 2001. Conditions on the water and sediment quality were evaluated at 11 sites within the Pond---Old Swamp River was one of those sites evaluated. It's remarkable, how consistent these results compared with the studies done 20 years ago. Beta Group's findings on Old Swamp River were:

- Elevated levels of nitrogen (2nd highest of the 11 sites). This is the most significant factor of speeding up the eutrophication process in Old Swamp. High levels of nitrogen also contribute to rapid aging and impairment of water quality in the Pond.
- Elevated levels of phosphorus (highest of the 11 sites). This, also, is an indication of severe eutrophic conditions. To add, there were two studies performed during the 1980's; a diagnostic study of our Pond by DEQE in March, 1981, and a feasibility study of restoring our Pond by Metcalf & Eddy in May, 1983. Both studies found that phosphorous is the most significant detriment to our Pond's water quality: Approximately 60% of the total phosphorous entering the Pond comes from Old Swamp River.
- Low levels of PH (lowest of the 11 sites). This increases the solubility of heavy metals, to include Naval aircraft, oil drums etc., which create food for the invasive weeds, which then encourages weed growth, which then elevates levels of phosphorus and nitrogen. This vicious cycle worsens, since, as these weeds die and decay in the sediment, the dissolved oxygen continues to lower, which is detrimental in supporting fish populations and aquatic life. Also, it encourages the speed of eutrophication!
- Elevated levels of dissolved ions (twice the amount considered for good water quality) These levels have continued to increase (comparing it to the Metcalf studies of 1981), which is another indication of eutrophication and rapid aging.
- Elevated concentrations of lead, iron, and manganese (these 3 metals tested highest of the 11 sites). Lead levels were above chronic levels, which exceeded primary drinking water standards. This elevated level also causes stress to certain fish. Manganese and iron, however, pose no health risk to human and aquatic life. They do, however, change water color to a rusty appearance and also create a bad water taste.
- Elevated levels of Beryllium According to Beta Group's report, sources of beryllium include numerous military activities, i.e., aircraft construction, rocket propellants and jet fuels. This explains why levels of beryllium are high in Old Swamp River!! I don't know much about beryllium, other than it can be life-threatening. That's enough for me to know! Option #5 certainly won't prevent the beryllium laden silt from traveling downstream to our Pond, nor will Option #5's proposed "cap" over the disposal site. In fact, there are already signs that this has been happening!.

Another fact in support of Option #6 pertains to the listing of Old Swamp River as a Section 303d water body, with degraded water quality. Section 303d waters have been targeted by the DEP and EPA (two knowledgeable Environmental Agencies) to restore our River. I believe their educated decision will have a say in this matter? **Do you think Option #5 will be a help or a hindrance in supporting their judgment call?**

My interpretation of this Option #5 is similar to sweeping dirt under a rug: It's a sloppy "quick fix"; The dirt can't be seen, but you know it's still there.

**So, what's your option? A "QUICK FIX" TO SAVE MONEY (OPTION #5)—or
A THOROUGH JOB TO SAVE LIVES & WHITMAN'S
POND ENVIRONMENTAL RESOURCES (OPTION #6)**

I must admit that the more I write about this sad, sorry situation, Option 5 or Option 6, the more I question ones ability to recognize values such as those I've previously mentioned. Who knows, maybe I have them wrong. I thought a human life; a resourceful Pond and its secondary water supply; its recreational resources; and its fish and wildlife were considered to be values. I also thought these type of values could never be attached to a price tag. Maybe I have this wrong too; otherwise, **why would there be an option #5 involved? It only serves to put all my "values" in jeopardy.**

With all respect to the U.S. Navy, the information that they are basing this serious decision on is totally insufficient and incomplete. I hope you agree, after reading this letter, that there's a great deal more to be considered---some of which does not include facts and figures. However, I believe the U.S. Navy will not allow their honor to be challenged. So, I hope my faith in their integrity will find them doing the just job necessary to safeguard any possible harm, loss, or injury.

Sincerely,



Lorraine A. Larrabee, President
Whitman's Pond Association



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

**EPA Statement Regarding Proposed Plan for Operable Unit 2, Rubble Disposal Area,
at South Weymouth Naval Air Station National Priorities List Site
February 27, 2003 Public Hearing**

EPA requests that the following statement be entered into the public record:

In our comments on the Proposed Plan for Operable Unit 2, Rubble Disposal Area (RDA), at the South Weymouth Naval Air Station National Priorities List Site (which comments we have presented in letters to the Navy dated July 15, 2002, November 26, 2002, January 13, 2003 and January 31, 2003), EPA has requested that the Navy:

perform a pre-remedial design investigation at the RDA site in order to develop data to support the chosen remedy and optimization of the design,

further characterize the disposal material to verify that the design will be adequate to its purpose,

expand and optimize the long-term monitoring network,

evaluate potential long-term impacts to the nearby GW-1 drinking water resource,

assess the potential for compromise of the cover by high surface-water levels and/or flood waters, and

determine whether the site is located within an active flood plain.

As we have explained, EPA does not agree that the Navy has sufficient information to complete a remedial design at this time. The Navy has responded that it will not perform the requested investigation work prior to the design phase because, in its view, such work is not necessary to support the conceptual designs of the remedial alternatives evaluated in the Feasibility Study Report. The Navy has also responded that there will be opportunities to gather and interpret additional data about the RDA site in the basewide watershed assessment, as well as in conjunction with site long-term monitoring.

EPA disagrees with the Navy about the timing of the requested investigation work. However, we believe that the Navy has addressed our primary concern, by acknowledging its responsibility to adequately respond to any new data needs that arise as the remedial design advances, in order to ensure a remedy that is protective of human health and the environment. We continue to believe that a pre-design investigation would be the most efficient and focused (as well as cost-effective) means of obtaining the data needed to support a consensus for a final design. Therefore, EPA will agree with the final Proposed Plan with the caveat that we will be unable to concur with a final remedy for the RDA site until these issues, which we have raised repeatedly, are adequately addressed.

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Internet Address (URL) • <http://www.epa.gov/region1>

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FORE RIVER WATERSHED ASSOCIATION

Clean, Beautiful and Accessible



P.O. Box 892102, Quincy, MA 02269
781-331-2700-t - 781-331-0008-f

March 26, 2003

Mr. Mark E. Krivansky, Remedial Project Manager
U.S. Department of the Navy
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

Jodi Purdy-Quinlan
Executive Director
purdyquinlan@attbi.com
www.foreriver.org

RE: PROPOSED PLAN FOR RUBBLE DISPOSAL AREA, NAS SO. WEYMOUTH, MA

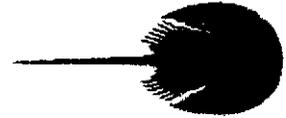
Dear Mr. Krivansky:

The Fore River Watershed Association is a 501 (C)(3) non-profit organization dedicated to making the Fore River Watershed clean, beautiful and accessible. We are concerned about the above-referenced project and would like to comment as part of the official record.

We respectfully encourage you to choose Alternative RDA #6 – Remove All Disposed Material Offsite for this Superfund site for the following reasons:

- The Navy filled wetlands abutting Swamp River to create this 4 acre landfill;
- The RDA is located on the banks of the Swamp River;
- Swamp River is a Class A drinking water supply to the Town of Weymouth;
- The Navy has found PCBs in the wetlands; lead, arsenic, manganese and benzo(a)pyrene in the groundwater;
- There have been several decaying drums containing unknown chemicals identified in the wetlands in the RDA;
- The RDA sits atop a Medium Yield Aquifer, which is a potential drinking water supply or a potential supply of irrigation water for recreational fields;
- Potential risk from transformers, their components and their fluids that were allegedly disposed of in the RDA;
- Potential risks to public if removal is not complete;
- Potential risks to public as this site is close by a proposed canoe launch;
- Potential risks to public as site is located within an Open Space Zone District;
- Potential risks to public as there is still a question as to what lies beneath the RDA;

FORE RIVER WATERSHED ASSOCIATION



- There are too many unanswered questions given the fact the Navy has failed to complete its Basewide Watershed Assessment to determine all the effects of contamination on the Base;
- The capping option will not prevent further contamination of the groundwater;
- The Re-Use Plan zoning requires an Aquifer Protection District for any potential medium or high yield aquifer;
- The capping option is not permitted in an Aquifer Protection District;
- The capping option cannot guarantee future problems and the communities cannot guarantee when the Navy would correct the problem.

Thank you for considering our comments. can be reached at 781-331-2700.

Sincerely,

Jodi Purdy-Quinlan
Executive Director

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We Welcome Your Comments!

What is a Formal Comment?

Federal regulations make a distinction between "formal" comments received during the 30-day public comment period, and "informal" comments received outside this comment period. While the Navy uses comments throughout the cleanup process to help make decisions, as required, it responds to formal comments.

Formal comments can be submitted orally. To make a formal comment on the Proposed Plan, you need only do (1) offer oral or written comments during the public information public hearing on February 27, 2003, or (2) send written comments postmarked no later than March 26, 2003. Attachment A is provided for your convenience.

Your formal comments will become a part of the official record for the RDA. This is a crucial element in the decision making process for the site. The Navy will consider all comments received during the comment period prior to making the final cleanup decision for the site.

Use this form!

The Navy encourages your written comments on the Proposed Plan for the RDA at NAS South Weymouth. You can use the form below to send written comments. If you have questions about how to comment, please call Mark Krivansky at (610) 595-0567 ext. 153.



Please use this space for comments.

Dear Sir

I agree with your choice of Alternative RDA-5. with which public opinion would agree. Some of the other alternatives would be satisfactory if the public were not involved.

Alternative RD5 eliminates public fears

Comments submitted by:

Address:

We Welcome Your Comments!

What is a Formal Comment?

A formal comment is a written statement that you submit to the Commission on the merits of a proposed rule. It is a chance for you to express your views on the proposed rule and to provide information that may help the Commission make a better informed decision.

How do I submit a formal comment on a proposed rule?

You may submit a formal comment in person, by mail, or by electronic mail. If you submit a comment in person, you should bring a copy of the comment to the Commission's office. If you submit a comment by mail, you should send it to the Commission's office. If you submit a comment by electronic mail, you should send it to the Commission's office.

Comments should be submitted to the Commission's office at the following address: Commission on the Merits of Proposed Rules, 100 State Street, 10th Floor, Boston, MA 02109. Comments should be submitted to the Commission's office by the deadline date for the proposed rule.

Do I have to?

No, you do not have to submit a formal comment on a proposed rule. However, submitting a comment is a good way to let the Commission know what you think about the proposed rule. If you have any questions about how to submit a comment, please call Mark Koverly at (617) 552-3333.

Please use this space for comments:

IS THERE A WAY TO MAKE
SURE WE CHOOSE RDA'S
HOW CAN RDA'S ENSURE THAT THE
RIGHTS ARE PROTECTED?
WOULDNT RDA'S INCREASE
THE CHANCE OF SUCCESS AND
DECREASE THE CHANCE OF ERROR?
Thanks you your help

Comments submitted by:

Bill Murphy

Address:

130 Falls Circle
Weymouth, MA 02190

JOHN KERRY
MASSACHUSETTS

COMMITTEES
COMMERCE, SCIENCE,
AND TRANSPORTATION
FINANCE
FOREIGN RELATIONS
SMALL BUSINESS

United States Senate

WASHINGTON, DC 20510-2102

One Bowdoin Square
Tenth Floor
Boston, MA 02114
(617) 565-8519

April 1, 2003

Captain Mark Ferguson
Director, Senate Liaison Office
Department of the Navy
182 Russell Senate Office Building
U.S. Senate
Washington, D.C. 20510

Dear Captain Ferguson,

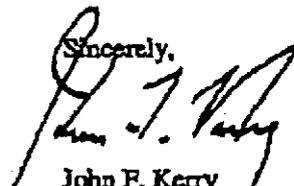
I am forwarding to you a copy of a letter from Mr. Dave Wilmot concerning his request for assistance in looking into the Navy's proposal for the Naval Air Station at South Weymouth, Massachusetts.

It is the desire of this office to be responsive to all inquiries and communications. I respectfully ask for your assistance in resolving the issues outlined in the attached correspondence.

Please convey a copy of your response to the issues raised in Mr. Wilmot's letter to Meaghan F. Hohl of my Boston office.

I thank you for your cooperation in this matter.

Sincerely,



John F. Kerry
United States Senator

JFK/mfh

To: Senator John Kerry

From: Dave Wilmot, Abington, Massachusetts citizen

Date: 04-01-03

Re: Concerns with the Redevelopment Plans of the former South Weymouth Naval Air Station w/Comments as Regards Naval Remediation of South Weymouth Naval Air Station(SWNAS) Rubble Disposal Area(RDA) Cercla Site.

Dear Senator Kerry,

My name is Dave Wilmot, I live in a neighborhood that abuts the former SWNAS. I have Multiple Sclerosis, as do at least 56 others in neighborhoods surrounding the base. 40 of us live within a mile of the base. These numbers may be tip of the iceberg, we haven't really begun to canvass neighbors. All these people have come forward after reading of our growing concerns in the newspapers. Other neighbors are coming forward with diseases many in the scientific community believe also have an environmental factor in their manifestation.

The first parcels of this base are due to be transferred from the Navy to our local development corporation on April 15 2003. A growing number of us believe this to be unjust to our children, and the Public Health of our towns. We likewise believe that Public Health be prioritized before any fiscal concerns some might have.

I will quickly summarize some of our concerns. We believe the proposed "Early Transfer", and, beginning with the first FOST transfer parcels of land April 15th, does not afford our citizens protection from an unjust health burden being forced on us. We don't believe the need to rush into development before our health questions have been answered is just.

There are currently five Health Studies being conducted in our communities by the Massachusetts Department of Public Health.

The developers are currently operating without a valid Reuse Plan adopted by our towns. The local South Shore Tritown Development Corporation has taken on a new partner "Master Developer" Lennar Associates. Lennar Associates, due to current fiscal development conditions in the state, plans to add a large residential aspect to the redevelopment. These changes to plans have not been voted on by the populace. We are three years into water bans here in Abington. We have no sewerage expansion capabilities. Our schools are full, and cutting back. This firm from California shouldn't be talking residential at all at this time. These lands were to be returned to us and developed for our best interests. I question whether our best interests are any kind of priority now.

The lands already found "Suitable For Transfer" in this FOST Process, have two poisoned streams running through them. Given the numbers of families touched by disease (Brain Cancer, Leukemia, MS, ALS...), living by these waterways as

these streams come off the base, I find the transfer of any lands at this time irresponsible. Franches Stream is lifeless as it flows into our neighborhoods. A sludge and heavy-metal filled channel flowing out of the base through our neighborhoods, and into the North River.

No Testing of wells outside the base fence has been done. The Navy refuses to do it.

No promised Watershed Study has been provided.

We are currently working with the Toxics Action Group, a non-profit organization that leads expertise to grassroots citizens group, in addressing Environmental Injustice. We will be applying for a State Tag Grant to assist us in the offsite testing we believe is necessary.

The Environmental Protection Agency(EPA) has just announced that they "now believe children to be ten times more susceptible to chemical toxins" than formerly considered. The health of our children is not being provided for, if the powers that be are not considering revisiting the testing that has been done, with the more stringent Maximum Contaminant Levels that the EPA is proposing.

The EPA has also just announced that the solvent TCE, which has been detected on the base, "is 60 times more toxic than previously thought to be". This again raises the issue of whether retesting is prudent.

We don't believe enough testing has been done. Just recently a Remedial Action on the base(RIAS) proved to require the removal of 210 cubic yards of PCB contaminated soils, when the Navy's initial testing had them projecting that the remedial action would only require removal of 10 cubic yards of soil. Twenty One times more contamination than expected. What else is out there? A hangar on the base just became the 10th known Superfund site on the base. If Superfund sites are still being found, we don't believe sufficient testing has ever been done to protect our health, our children's health.

How are people, already sick, supposed to react when they read things like the EPA's response to the Navy Draft Feasibility Study of the West Gate Landfill. How can the powers that be expect us not to be concerned when the EPA says things like this to the Navy; (Page 2-11, Section 2.3.6) "In the last paragraph, please change the sentence 'Samples of surface water and sediment collected from Franches Stream exhibited chemicals concentrations that were generally consistent with background conditions, with few exceptions.' To, reflect the fact that numerous inorganic chemicals exceed background in sediment and surface water. These chemicals include aluminum, antimony, barium, beryllium, iron, manganese, mercury, silver and zinc." How can we protect ourselves from such deliberate misrepresentations of the truth?

This "Early Transfer" through execution of a "Covenant Deferral Request" allows circumvention of the Cercla laws by the Navy. This postponement of total cleanup, can do nothing but jeopardize our citizens Public Health, and leave our struggling towns with future fiscal concerns.

Senator Kerry, we need your support. We will not accept the excess health burden proposed for us without our best efforts given to remedy that proposal. The remainder of this letter is composed of comments regarding the remediation of the Rubble Disposal Area Superfund Site. (This, another good example of fiscal concerns jeopardizing the Public Health.)

I thank you for your time & interest,

Dave Wilmot
10 Arch St
Abington, Ma 02351 www.awares.com

Comments submitted to U.S. Navy to address their proposed method of remediation of Rubble Disposal Area (RDA) Superfund site on SWNAS.

Being a member of a growing group of citizens with serious health concerns in neighborhoods surrounding the former air station, my question will be surmised in a statement concerning my disagreement with the Navy's proposed remediation method.

The Rubble Disposal Area Superfund Site is a former dumping ground located beside and in Wetlands, directly adjacent to Old Swamp River, a water way that runs North through the base, and discharges into Whitman's Pond in Weymouth. Whitman's Pond is the city of Weymouths secondary drinking water source.

The Navy admits that they have four substances of concern, that have been found in the Rubble Disposal Area.

The concerns in the Rubble Disposal Area, were established by concentrations of these substances being heavier in the RDA than Baseline Sample Testing that was done. The four substances; PCB's, Arsenic, Lead and Benzo(a)Pyrene , are four of the eight top substances that the Federal Center for Disease Control's Toxic Disease Registry has labeled as Priority Toxins. Since this priority toxin listing is made up of 278 substances, I would have assumed, having four of the top eight of these substances in elevated levels at this former dump, would make it subject to a full and complete cleanup.

I would also have assumed, that presence of these four toxins with a direct migratory path to the City of Weymouth's Secondary drinking water supply, would

mandate a complete cleanup being done. I would like to hear the Navy's position on its BRAC responsibilities to our towns public health.

As the State Department of Public Health continues their efforts to find out why children in South Weymouth have developed Arsenic Poisoning, I believe the leaching of admittedly high concentrations of Arsenic from this landfill, directly into Old Swamp River would provide an interesting avenue of exploration for the State Health scientists. Much effort has been given to studies of Great Pond, but what of South Cove in Whitmans Pond, where the remainder of the drinking water in Weymouth is pumped from. The Navy and United States Government should afford our citizens the most comprehensive Public Health efforts available to them. To do less, when known contaminants from the former base, can be proved to be migrating offsite with proper testing methods, would seem to me to be criminal.

A Habitat Study of Whitman's Pond, completed by Beta Group in 2001 for the City of Weymouth, cited elevated levels of Lead, Iron and Manganese, Arsenic and Beryllium in the pond sediments. Given the limited uses of Beryllium, I would have high suspicions of off base migration of pollutants. Per this document, Beryllium is used in "numerous military activities, including aircraft construction, rocket propellants and jet fuel. This would assumedly be a direct link to SWNAS pollutant migration off site. Please provide other possibilities for this toxins presence in Whitman's Pond. Why has the Navy consistently refused to test wells outside the base. We insist the Navy take responsibility for past environmental degradation done to our communities.

The Navy's preferred method of cleanup is the 1.6 million option presented in their pamphlet, which would consist of a removal action of some of the PCB-contaminated wetland soil, and construction of a cap over the remaining contaminants. Unfortunately, I believe historically and again in this case, that money concerns are prioritized above Public Health concerns. I don't believe the Navy preferred cleanup route is just to the people of our towns.

Anything less than Option 6 (Complete Offsite Removal) undermines the Public Health of our towns.

Removing All contaminated fill and disposing it offsite is projected to cost 11.3 million. This might sound like a lot of money, but compared to the money now spent on exploding chronic disease in our nation, it's chump change, an ounce of prevention.

As stated above, I belong to a growing group of local citizens who have reason to believe that the Navy should be responsible to protect the Public Health of former Host Communities. My children's future health could easily depend on this, I've little doubt that Rockland and Weymouth's children depend on this as well.

The Environmental Protection Agency has recently announced that Maximum Contaminant Levels(MCL) devised for the protection of Public Health, do not

afford protection to children. Children are now believed to be ten times as susceptible, to contaminants, than the adults these MCL's were devised by. We insist that the health of our children be protected. As, thus far, 56 diagnosed cases of Multiple Sclerosis around the base(40 within 1 mile), have been substantiated, we must insist for the health of our children, that the Navy adhere to the most stringent clean up standards at this site. Anything less than complete cleanup is unacceptable. As we continue to delve further into the health of our neighborhoods, it is becoming increasingly evident that we have been saddled with a heavy health burden here. We insist on the Navy showing proper regard for the health of our children. The RDA Option 6 is the only way to show that regard.

Thank you,
David Wilmot
10 Arch St
Abington, Ma. 02351