

**EXPLANATION OF SIGNIFICANT DIFFERENCES  
TO THE  
RECORD OF DECISION**

**OPERABLE UNITS 2 AND 9  
RUBBLE DISPOSAL AREA**

**NAVAL AIR STATION SOUTH WEYMOUTH  
WEYMOUTH, MASSACHUSETTS**

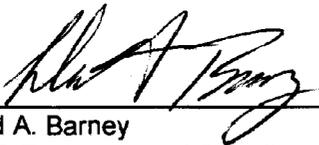
**February, 2012**

**STATEMENT AND PURPOSE AND AUTHORIZING SIGNATURES**

This decision document explains the basis for the determination to issue the attached Explanation of Significant Differences (ESD) to the Record of Decision (ROD) regarding the Rubble Disposal Area (RDA), which is located at the former Naval Air Station (NAS) South Weymouth, Massachusetts.

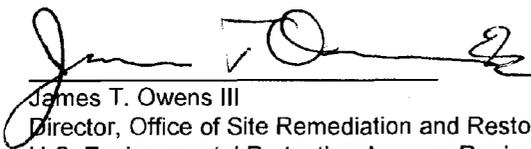
For the reasons documented herein, by my signature below, I approve the issuance of this ESD for Operable Units 2 and 9, the RDA, at the NAS South Weymouth Superfund Site and the changes stated therein. Concur and recommended for immediate implementation:

U.S. Department of the Navy

By:   
\_\_\_\_\_  
David A. Barney  
BRAC Environmental Coordinator  
Naval Air Station South Weymouth  
U.S. Navy

Date: 3/12/12

Concur and recommended for immediate implementation:

By:  Date: 3/9/12  
James T. Owens III  
Director, Office of Site Remediation and Restoration  
U.S. Environmental Protection Agency, Region I

**EXPLANATION OF SIGNIFICANT DIFFERENCES  
OPERABLE UNITS 2 AND 9 – RUBBLE DISPOSAL AREA  
NAVAL AIR STATION SOUTH WEYMOUTH, MASSACHUSETTS**

**1.0 INTRODUCTION TO THE SITE AND STATEMENT OF PURPOSE**

**1.1 Site Name and Location**

Naval Air Station South Weymouth  
1134 Main Street  
Weymouth, Massachusetts 02190  
MA2170022022  
Operable Units 2 and 9 – Rubble Disposal Area

**1.2 Identification of Lead and Support Agencies**

The U.S. Navy is the lead agency for all environmental investigations and cleanup programs at NAS South Weymouth. The lead regulatory agency is the U.S. Environmental Protection Agency Region 1 (EPA). The Massachusetts Department of Environmental Protection (MassDEP) provides additional regulatory agency support.

**1.3 Legal Authority**

Under Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), if EPA determines that the remedial action at a site differs significantly from the Record of Decision (ROD) for that site, then an explanation of the significant differences between the remedial action being taken and the remedial action set forth in the ROD shall be published which includes the reasons such changes are being made. Section 300.435(c) of the National Contingency Plan (NCP) and EPA guidance (OSWER Directive 9355.3-02) indicate that an ESD rather than a ROD Amendment is appropriate where the changes do not fundamentally alter the overall remedy with respect to scope, performance, or cost. Because the adjustments to the remedial action do not fundamentally alter the overall remedy for the ROD, this ESD is being properly issued.

In accordance with Section 300.825(a)(2) of the NCP, this ESD will become part of the Administrative Record for the RDA and is also available for public review at the NAS South Weymouth Caretaker Site Office (Building 11, Shea Memorial Drive) and the local Information Repositories identified below. In addition, a notice that briefly summarizes this ESD will be published in the major local newspapers of general circulation.

**1.4 Overview of the ESD**

The December 2003 ROD for the RDA (the Site) specified excavation of PCB-impacted soil, construction of a 4-acre soil cap for the landfill, long-term monitoring (LTM), institutional controls (ICs), and 5-year reviews. These remedial measures addressed the identified potential risks to small mammals from exposure to PCBs in hydric soil; addressed the potential risks to humans from consuming groundwater without standard, municipal-level treatment; and met all pertinent state landfill closure regulations.

The following alterations to the existing remedy and its components are necessary to allow the construction of the planned East West Parkway:

- Removal, replacement, and realignment of certain Engineering Controls (post and rail fence).
- Removal and replacement of certain monitoring wells and stations.
- Alteration of the low permeability soil cover's perimeter drainage swale.

The adjustments presented in this ESD to the ROD do not fundamentally alter the overall Remedial Action for the RDA with respect to scope, performance, or cost.

## **1.5 Availability of Documents**

In accordance with Section 300.825(a)(2) of the NCP, this ESD will become part of the Administrative Record for the RDA. This ESD is also available for public review at the following locations:

Department of the Navy  
Caretaker Site Office  
c/o David Barney  
1134 Main Street, Building 11  
South Weymouth, MA 02190

Tufts Library  
46 Broad Street  
Weymouth, MA 02188  
(781) 337-1402

Abington Public Library  
600 Gliniewicz Way  
Abington, MA 02351  
(781) 982-2139

Hingham Public Library  
66 Leavitt Street  
Hingham, MA 02043  
(781) 741-1405

Rockland Memorial Library  
336 Union Street  
Rockland, MA 02370  
(781) 878-1236

## **2.0 SITE HISTORY, CONTAMINATION AND SELECTED REMEDY**

### **2.1 Site Description and History**

NAS South Weymouth is located approximately 15 miles southeast of Boston, Massachusetts in Norfolk and Plymouth Counties. Portions of NAS South Weymouth are located in the Towns of Weymouth, Abington, and Rockland (Figure 1). NAS South Weymouth was operationally closed on September 30, 1996 and administratively closed on September 30, 1997 under the Base Realignment and Closure Act of 1990.

The RDA is a closed landfill covering approximately 4 acres in the eastern portion of the NAS South Weymouth property, east of Runway 8-26 (Figure 2). Roads and trails are located to the north and west of the Site and forested uplands are located south of the Site. The RDA is bound to the east by palustrine wetlands that border Old Swamp River. The river flows to the north and passes through four 10-foot wide corrugated metal conduits located underneath an existing access road along the northeast corner of the landfill. A small intermittent stream, described as a feeder stream, discharges into Old Swamp River just north of the metal conduits. A second feeder stream borders the RDA to the south and east, entering the palustrine wetland, and flowing north prior to discharging into Old Swamp River.

The Navy disposed of natural debris (e.g., boulders and tree stumps) and building debris (e.g., concrete and other construction materials) in the area during development and operation of NAS South Weymouth. The RDA was used for approximately 4 years between 1959 and 1962 and again for a short period in 1978. Between 1959 and 1962, the RDA was used for disposal of large natural debris (described above) and tree stumps that were unsuitable as base-material for construction of earthen bridge abutments and roadways. In 1978, partially burned building debris and associated rubble from Building 21, which was destroyed by fire, were placed in the RDA. In addition to these two uses of the Site, there have been unofficial reports that transformers, transformer components, or transformer fluids were disposed of at the RDA. Materials observed at the Site during environmental investigations included glass, insulation

material, concrete, scrap metal, wire, asphalt, rubber, fabric, boulders, and wood. There are no records of hazardous waste, regulated under Subtitle C of the Resource Conservation and Recovery Act (RCRA), being disposed of at the RDA.

Following completion of the ROD in 2003, the Navy constructed an engineered, vegetated soil cap over the RDA (soil cap). A locked, metal swing gate is located at the landfill entrance to the west. Surrounding the landfill is a wooden railing approximately 3.5 feet high; storm water controls consisting of drainage swales and rip-rap slope protection are also located along the perimeter of the landfill. A passive landfill gas management system is present and consists of eight gas vent (GV) pipes and seven gas probes (GP). The vent pipes were installed through the landfill cap; the gas probes were installed outside the limits of the cap adjacent to the western and northwestern landfill boundary. Ten groundwater monitoring wells (MW), nine piezometers (PZ), and eight staff/stream gauges (G) are located on and in the vicinity of the Site. Regional groundwater flow in the area of the RDA is generally to the east, toward Old Swamp River.

## **2.2 Enforcement History**

In May 1994, NAS South Weymouth was listed on EPA's National Priorities List (NPL). Environmental studies and activities at NAS South Weymouth have been conducted by the Navy in accordance with CERCLA and NCP.

Based on the designation of the NAS South Weymouth property as an NPL site, a Federal Facility Agreement (FFA) was executed by the Navy and EPA. The FFA became effective in April 2000 and established the Navy as the lead agency for the investigation and cleanup of NAS South Weymouth property, with EPA providing oversight. The MassDEP is not a party to the FFA but, in accordance with CERCLA and the NCP, MassDEP has participated in ongoing discussions and strategy sessions, as well as provided oversight and guidance through their review of the Navy's Installation Restoration Program documents.

In accordance with the FFA, a Site Management Plan (SMP) with task schedules and deliverables is updated annually each summer. The SMP serves as a management tool for planning, reviewing, and setting priorities for environmental investigative and remedial response activities to be conducted at NAS South Weymouth. The SMP is available for public review at the NAS South Weymouth information repositories listed in Section 1.5 of this ESD.

## **2.3 Site Contamination**

### **Soil**

With respect to soil, the results of the ecological risk assessment indicated potential adverse effects to small mammals based on exposure (ingestion) of PCBs. Following completion of the ROD, the Navy excavated and properly disposed offsite approximately 54 cubic yards of PCB-impacted hydric soil to mitigate that risk. Post excavation sampling indicated that cleanup goals were achieved, leaving no samples with PCB concentrations greater than 8 mg/kg (ecological risk-based cleanup goal); the arithmetic mean of post excavation samples was below 1 mg/kg (literature-based risk screening value).

### **Groundwater**

In groundwater, unacceptable risks were associated with hypothetical future residents consuming site groundwater containing arsenic, benzo(a)pyrene, and manganese. Cleanup goals for these chemicals were established as the federal Maximum Contaminant Levels (MCLs) or non-zero Maximum Contaminant Level Goals (MCLGs) under the Safe Drinking Water Act or, if lower, the state MCLs under the Massachusetts Office of Research and Standards. In the absence of such standards, a risk-based standard was calculated.

### **Landfill Gas**

The Landfill Gas Investigation Report prepared by Tetra Tech in July 2011 stated that based on 83 sampling locations, 68 percent showed methane concentrations below the lower explosive limit (LEL) and 31 percent had methane concentrations above 25 percent of the LEL. One location showed methane concentrations between 10 percent and 25 percent of the LEL.

If methane concentrations are present above the LEL or other risk based thresholds for methane established for the work area, they could represent a health and safety concern or threat. The detection of methane above 25% of the LEL is in violation of the Massachusetts Department of Environmental Protection (MassDEP) thresholds, as per 310 CMR 19.132(4)(h) and possibly other regulations or guidance and may trigger a notification threshold to the MassDEP. If methane is present above the Upper Explosive Limit (UEL), an explosion hazard could still exist, since if diluted, concentrations could be within ranges deemed a hazard.

Since elevated methane levels (greater than 25 percent of the LEL) were detected in the vicinity of the Project, the Contractor has been notified of this potential hazard, and proper health and safety precautions are being developed and implemented per applicable federal and state regulations and standards.

### **2.4 Remedy Selected in the 2003 ROD**

The December 2003 ROD for the RDA specified the following components:

- Removal and offsite disposal of approximately 54 cubic yards of PCB-impacted hydric soil from the adjacent wetland area to protect ecological receptors;
- Construction of a 4-acre soil cap over the onsite disposed material to meet state regulations for landfill closure;
- Site maintenance and long-term monitoring (LTM) as required under state landfill closure regulations;
- ICs to restrict intrusive activities on the landfill cap and prevent human exposure to groundwater beneath the landfill containing contaminant concentrations greater than federal and state drinking water standards; and
- 5-year reviews by the Navy to ensure that the selected remedy continues to be protective of human health and the environment.

During construction of the soil cap in 2004-2005, additional PCB-impacted soil was identified in an upland area near the northeast end of the landfill. The Navy excavated the additional soil and properly disposed of it at an offsite, licensed facility. Petroleum-impacted materials were detected in the wetland in the vicinity of the east-central portion of the landfill. Remedial actions were taken to protect potential ecological receptors from exposure to these materials. Additional details can be found in the Final Remedial Action Completion Report for the RDA.

### **2.5 Explanation of Significant Differences, August 2010**

Upon a written request from EPA in October 2008 the Navy finalized an Explanation of Significant Differences (ESD) in August of 2010 with subsequent EPA concurrence. The ESD provided administrative changes to the Applicable or Relevant and Appropriate Requirements (ARARs) and To Be Considered (TBC) provisions of the ROD. Additionally, the ESD augmented the 2003 ROD with the implementation of a Monitored Natural Attenuation remedy for groundwater. This further prompted the

establishment of an interim Land Use Control boundary as provided via an amendment to the Land Use Control Implementation Plan (LUCIP) in September 2010.

### **3.0 BASIS FOR THE DOCUMENT**

A Land Use Controls Implementation Plan (LUCIP) was prepared for the RDA and finalized in October 2009. The LUCIP was then amended in September, 2010. The LUCIP was developed as part of the remedial design for the RDA to address land use control implementation actions in accordance with the ROD and the FFA for NAS South Weymouth. As stated in the Navy Principles, Land Use Controls (LUCs) are used at sites where contaminants are left in place at levels that do not allow for unrestricted use to ensure that any remaining contaminants do not pose an unacceptable risk to human health and the environment. LUCs can consist of institutional controls and/or engineering controls. Institutional controls, such as restrictions, notifications, etc., are typically legal documents in the form of deed restrictions, easements, and restrictive covenants. In the form of a legal document, the institutional controls will run with the land. Engineering controls are typically barriers, such as the fence and gate at the RDA. The institutional controls include certain restrictions on the uses and activities, including any use or activity which would be reasonably likely to interfere with the implementation, effectiveness, integrity, operation or maintenance of the permeable soil cap or any other cap, cover, or ground cover feature of the RDA Land Use Control area, as well as riprap, fences, gates, gas vents, gas probes, monitoring wells, piezometers and staff gauges, etc.

The RDA is located immediately south of the proposed East-West Parkway (the Project), which consists of the construction of a parkway alignment that will be approximately 2.75 miles long. The proposed Project is adjacent to the RDA along Stations 103+00 to 111+00. Exhibit A (attached) shows the construction area in relation to the RDA and the limits of the disturbance area.

As shown on Exhibit A, a total of four 10 foot diameter corrugated metal conduits are located below the current gravel roadway and are used to convey water along the Old Swamp River. It is proposed that the upper portion of the westernmost corrugated metal conduit which is located under the Old Swamp River Bridge be removed for construction of the Project. The westernmost corrugated metal conduit is located within the northeastern boundary of the RDA; however, the soil cap will not be disturbed during the removal of the upper portion of the westernmost conduit. The three remaining corrugated metal conduits which are located east of the westernmost corrugated metal conduit will be completely removed. The northern portion of the westernmost corrugated metal conduit will be completely removed beginning approximately 30 feet north of the RDA.

In addition, one piezometer, RDA-PZ05, that was installed adjacent to the RDA as a component of the post-closure long-term monitoring program, will need to be reconfigured as part of construction of the Project, as it is located immediately west of the westernmost corrugated metal conduit which is also proposed to be removed. Its location will remain unchanged, but the elevation of the well head may need to be adjusted to match the new grading in that area.

A portion of the timber guardrail that was installed during the implementation of the ROD for the RDA will need to be removed for construction of the Project. The timber guard rail will be removed from Sta. 109+63 easterly to its end. All leftover timber guardrail will be returned to Navy. It will be replaced with a steel guardrail that has been designed for the Project starting at Sta. 109+63 and continuing easterly to the new bridge abutment and will include appropriate signage as required in the ROD. Silt fencing has been installed throughout the project to exclude box turtles from the construction zone. When the wood guard rail is removed, the silt fence will likely be temporarily removed to allow access to work on the wood guard rail. Once the wood guard rail is removed, the silt fence will be reinstalled in the same location to prevent turtle access and maintained through the rest of the project construction. After the steel guard rail is installed, the permanent wire wildlife barrier fence will be installed behind the guard rail. Until the permanent wildlife fence is installed, silt fence will be maintained along the project limits.

Surface water will be encountered on site and will need to be managed as part of the culvert removal activities. However, no groundwater management is anticipated within the permanent or interim LUC boundaries.

The 2010 surface water analytical results for surface water sampling location RDA-SWD located immediately north of the metal conduits in the feeder stream river channel are presented in the Draft Long Term Monitoring Annual Report for the RDA for the year 2010 (dated February 2011). There were no detections of volatile organic compounds (VOCs), volatile petroleum hydrocarbons (VPH), polycyclic aromatic hydrocarbons (PAHs), or pesticides in either sampling result above the laboratory reporting limits. In addition, all metals were shown to be either below the laboratory reporting limits or below the National Pollutant Discharge Elimination System (NPDES), Remediation General Permit (RGP), Total Recoverable Metal Limit in Massachusetts freshwaters. Therefore, based on this data, surface water does not present a human health risk to site workers performing work associated with this ESD.

#### **4.0 DESCRIPTION OF SIGNIFICANT DIFFERENCES OR NEW ALTERNATIVES**

The proposed activities within the permanent and interim institutional control boundaries of the RDA are needed as part of the removal of four 10-foot diameter culverts that convey Old Swamp River (OSR) and the associated restoration of the OSR corridor. Since a portion of the permanent and interim institutional control boundaries of the RDA crosses over the two western most culverts, removal of the culverts will necessarily involve work within the permanent and interim institutional control boundaries of the RDA and adjacent to the landfill. There is no unpermitted work within delineated wetlands associated with this ESD.

##### **4.1 Proposed Work Activities**

In general, the proposed activities will include excavation, grading, filling, planting and seeding, placement of riprap and installation of metal guard rail partially within the permanent institutional control boundary but outside the assumed location of the soil cap. Removal of the culverts will require excavating down to expose the culverts, unbolting and cutting the culvert sections and removal of the steel culvert sections. The lower portion of the western-most culvert will be left in place to serve to retain the fill materials of the landfill and cap and avoid disturbing the landfill to the extent possible. The portion of the culvert to remain will be backfilled with compacted ordinary borrow to bury the culvert section and covered with loam and seeded.

The existing riprap drainage channel that conveys runoff from the landfill cap will be maintained, with the eastern edge contoured and restored once the culverts are removed. The eastern edge of the riprap channel will be elevated slightly to ensure flow in the channel continues to be directed to the south and to the OSR. The riprap swale will be extended to the edge of the OSR at the lower (southern) end of the existing swale by placing additional stone after removal of the culvert. A small area of additional riprap will also be placed in the northeast corner of the permanent institutional control boundary to extend a stabilized swale toward the Parkway that will collect and direct any excess runoff from the roadway. The voids of the existing riprap channel will be infilled with ¾-inch crushed stone to provide a turtle compatible surface to allow passage of box turtles without creating a trap hazard in the rock voids. No dewatering is necessary to complete these construction activities. All excavation activities are outside the soil cap boundary, however, some grading and filling within the cap boundary may be needed. This work will not affect the soil cap in any way.

Additional activities within the permanent institutional control boundary will include removal of the existing wood guard rail from Sta. 109+63 easterly to the end. A steel guard rail will be installed from Sta. 109+63 to the new bridge abutment, to restrict vehicle access. The proposed design incorporates both a steel guard rail and a three foot high chain link fence that will both be placed along the edge of the roadway in

the locations where the wood guard rail is proposed to be removed. This will restrict both vehicular and pedestrian access to the landfill from the roadway. Therefore, the existing wood guard rail will be extraneous in the location where it is proposed to be removed. The signage in this area will also be reposted along the LUC boundary to enforce the restricted access.

The limit of the landfill cap is the centerline of the riprap swale that lies around the edge of the landfill. The landfill contents are interior of this line and will not be disturbed by this action. Excavation and grading associated with the removal of the culverts was intentionally designed to avoid impacting the soil cap and any excavations will remain outside the riprap swale centerline and therefore will not impact the soil cap integrity. Work within the permanent institutional control boundary and inside the swale centerline will include placement of ¾-inch stone to infill the voids of the existing riprap and allow turtles to access the soil cap. The geotextile fabric located underneath the RDA soil cap extends beneath the northern swale to beyond the centerline of the swale. If the geotextile fabric is impacted by the proposed work, it will be repaired or replaced.

Two piezometers used in the monitoring of the landfill are in close proximity to the proposed grading and culvert removal activities. At the downstream end of the culverts stream piezometer and staff gauge RDA-SPZ102/RDA-G102 is between the middle two culverts. Piezometer RDA-PZ05 is west of the culverts and within the area of excavation and grading needed to restore the OSR channel. During construction efforts will be undertaken to preserve these piezometers in place. However, it may be necessary to remove these piezometers to allow construction activities to be completed. If removed, these piezometers will be replaced as previously constructed, and in their original location. Along the edge of the permanent institutional control boundary on the north side, Gas probe GP-01 is close to the limit of work. This Probe will not be impacted and will be protected during construction. The locations of the piezometers and the gas probe are illustrated on the ESD Project Plan (Exhibit A).

## **5.0 SUPPORT AGENCY COMMENTS**

EPA and MassDEP review comments have been incorporated into the document.

## **6.0 STATUTORY DETERMINATIONS**

Considering the above-described adjustments to the selected remedy set forth in the 2003 ROD and the September 2010 amended LUCIP, the Navy believes that the remedy remains protective of human health and the environment and satisfies CERCLA Section 121.

## **7.0 PUBLIC PARTICIPATION**

Public review comments (and responses) are included in Exhibit C.

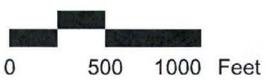


Source: USGS.

Vanasse Hangen Brustlin, Inc.

Site Location Map  
 Notice of Intent  
 East-West Parkway  
 Proposed Roadway Alingment  
 South Shore Tri-Town Development Corporation

Figure 1  
 September 10, 2010

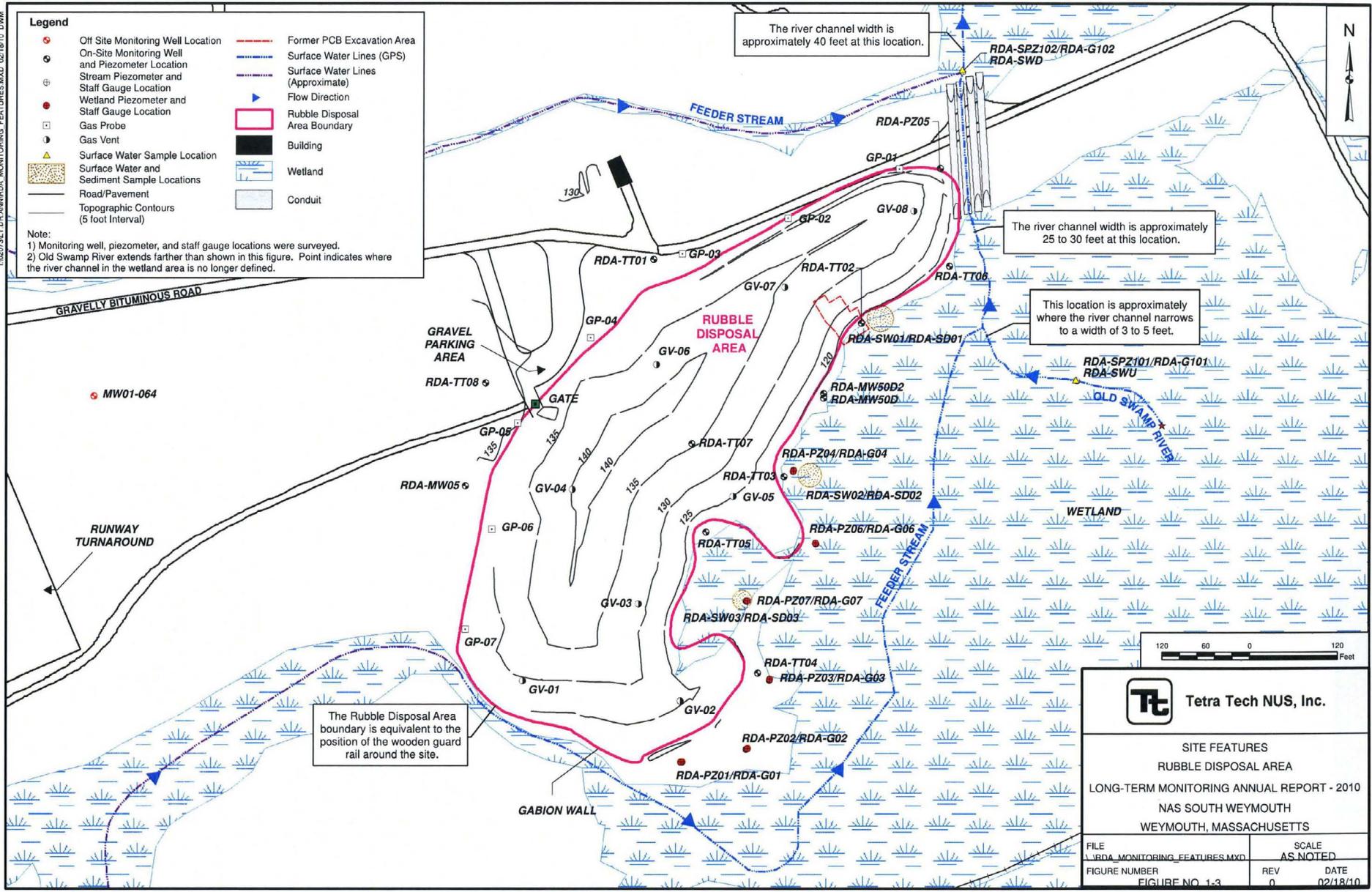


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**Legend**

- Off Site Monitoring Well Location
- On-Site Monitoring Well and Piezometer Location
- Stream Piezometer and Staff Gauge Location
- Wetland Piezometer and Staff Gauge Location
- Gas Probe
- Gas Vent
- Surface Water Sample Location
- Surface Water and Sediment Sample Locations
- Road/Pavement
- Topographic Contours (5 foot Interval)
- Former PCB Excavation Area
- Surface Water Lines (GPS)
- Surface Water Lines (Approximate)
- Flow Direction
- Rubble Disposal Area Boundary
- Building
- Wetland
- Conduit

Note:  
 1) Monitoring well, piezometer, and staff gauge locations were surveyed.  
 2) Old Swamp River extends farther than shown in this figure. Point indicates where the river channel in the wetland area is no longer defined.



The river channel width is approximately 40 feet at this location.

The river channel width is approximately 25 to 30 feet at this location.

This location is approximately where the river channel narrows to a width of 3 to 5 feet.

The Rubble Disposal Area boundary is equivalent to the position of the wooden guard rail around the site.



SITE FEATURES  
 RUBBLE DISPOSAL AREA  
 LONG-TERM MONITORING ANNUAL REPORT - 2010  
 NAS SOUTH WEYMOUTH  
 WEYMOUTH, MASSACHUSETTS

FILE RDA_MONITORING_FEATURES.MXD	SCALE AS NOTED
FIGURE NUMBER FIGURE NO. 1-3	REV DATE 0 02/18/10

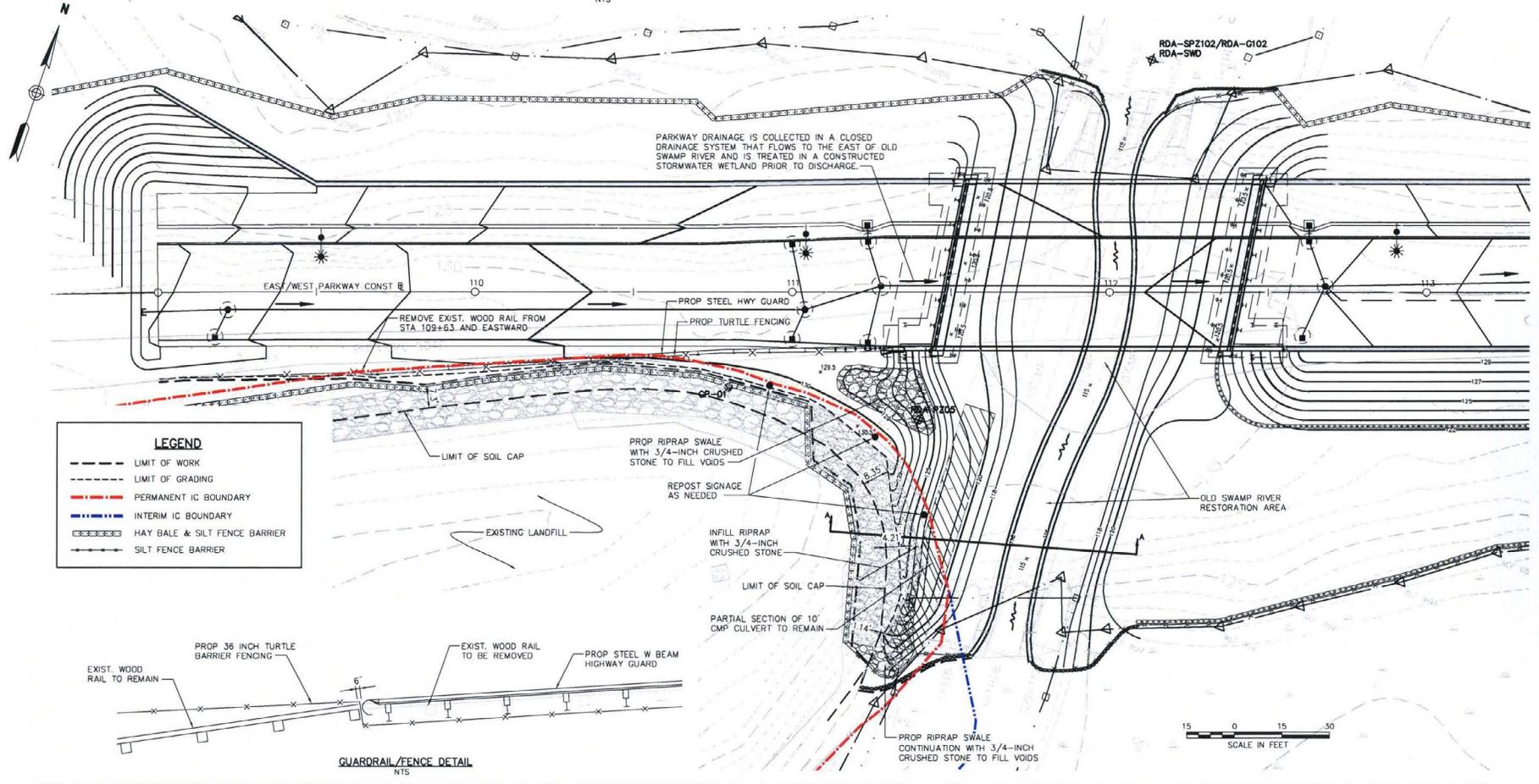
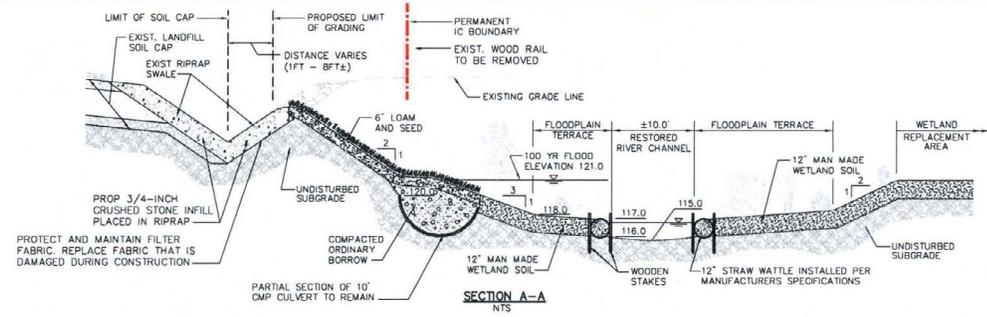


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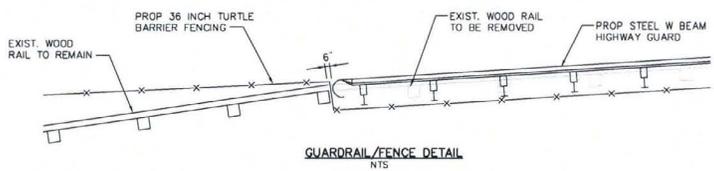
## **Exhibit A**

# **ESD Project Plan**

### ROCKLAND EAST/WEST PARKWAY – PHASE 1 ESD PROJECT PLAN



LEGEND	
---	LIMIT OF WORK
- - - -	LIMIT OF GRADING
---	PERMANENT IC BOUNDARY
- - - -	INTERIM IC BOUNDARY
	HAY BALE & SILT FENCE BARRIER
---	SILT FENCE BARRIER

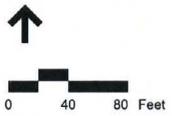




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## **Exhibit B**

# **Existing and Proposed Project Figures**



**Vanasse Hangen Brustlin, Inc.**

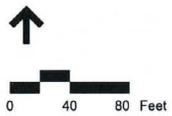
Existing Conditions February 24, 2012

ESD - RDA

East-West Parkway

South Shore Tri-Town Development

Corporation, Massachusetts



**Vanasse Hangen Brustlin, Inc.**  
Proposed Conditions February 24, 2012  
ESD - RDA  
East-West Parkway  
South Shore Tri-Town Development  
Corporation, Massachusetts



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## **Exhibit C**

### **Public Comments w/ Responses**



**REVIEW COMMENT SUMMARY and RESOLUTION FORM  
EAST-WEST PARKWAY AND RELATED IMPROVEMENTS**



No.	Sheet	Comment	Response
5	Sec 3-0	The removal of the metal conduit which is under old swamp river. Please explain how soil cap will not be disturbed? How will ground water be managed?	The work associated with removal of the metal conduits does not encroach into the limits of the soil cap. The construction operations described in the ESD will not impact the soil cap. Also, no groundwater will be encountered during the work, so no groundwater will need to be managed.
6	Sec 3-0	Also states the locations will remain unchanged but the elevation of the well head may need to be adjusted to match new grading in this area. While section 1 - 4 states the ESD to the ROD do not fundamentally alter the overall remedial action. Please explain?	Raising the elevation of the opening to the top of the monitoring well will have no effect on the function, location, accessibility, or accuracy of the well itself. The work described in the ESD will not alter the effectiveness or integrity of the remedial action.
7	Sec AA	Why is the River Channel shown with a width of 10 feet? The river channel shown in the figure scales to 6 feet?	10 feet is the correct number. The figure was not drawn to scale. It has been revised to scale to the correct dimension.
<b>Joanne Marques: 60 Circuit Road, South Weymouth, MA 02190 – 12/9/11</b>			
1	-	Why isn't there a setback requirement associated with the construction of a major roadway abutting a capped hazardous waste landfill site?	The Navy's ROD selected institutional controls in the form of Land Use Controls as a component of the final remedy for the RDA to prohibit activities or uses of the site that would disturb or otherwise interfere with the integrity or effectiveness of the Cap. These Land Use Controls are contained in the Land Use Control Implementation Plan (October 2009). The LUCIP boundaries were established to ensure the effectiveness and integrity of the remedy. There is no further "setback" requirement from the LUCIP boundary. The Parkway is located outside of the LUCIP boundary.

**REVIEW COMMENT SUMMARY and RESOLUTION FORM  
EAST-WEST PARKWAY AND RELATED IMPROVEMENTS**



No.	Sheet	Comment	Response
2	-	Since heavy equipment is being used to excavate as opposed to a garden shovel, is there any estimate as to the area of disturbance between the proposed Parkway guardrail and the RDA boundary?	The area of disturbance between the Parkway guardrail and the RDA boundary will be minimal in nature, performed by equipment stationed on the Parkway, and will have no impact (temporary or otherwise) to the soil cap. The final condition will not alter the way in which stormwater flows into the drainage swale.
3	-	Are there any regulations in place, and if so, what are they and have they been met?	The Parkway project has been permitted through an Order of Conditions, Section 401 and 404 permits, and with the written approval of the NHESP. Work is in conformance with all applicable regulations.
4	-	In case of an emergency situation, how would the RDA be accessed?	The Navy is working with SSTDTC to ensure continued vehicular access to the existing RDA site entrance gate during and after completion of the Parkway.
5	-	It looks as though damage of some kind to the RDA cap is inevitable. How would the geotextile fabric on the cap be repaired or replaced if it were damaged?	Damage to the RDA cap is not inevitable. All work in its vicinity will be conducted in a professional and safe manner, to prevent any impacts to the cap. The cap is permeable, so "damage" is a misnomer. The only material included in the cap that could potentially be "damaged" is the geotextile fabric whose function is to prevent animal intrusion into the area below the fabric. If the fabric is damaged, ripped, punctured, or otherwise, the space around the damage will be hand excavated, and a new layer of geotextile will be laid down over the existing. The new geotextile will overlay a minimum 2 ft. past the damaged area. Then, the soil cap materials (crushed stone, select fill, etc.) would be placed back over the geotextile, to completely recreate the soil cap, as it was originally constructed.
6	-	Since the RDA site had already been remediated to include permanent controls, the disturbance and alteration within this area seems to be contradictory to the established LUC's already in place.	The LUCIP addresses prohibited uses within the RDA boundary, but also establishes a set of procedures to allow amendments to the LUCIP. The ESD is one of those procedures.
7	-	Who will be responsible for contracting the proposed changes to the RDA site?	The work that is the subject of the ESD is contained in the contract between SSTDTC and the Phase I Parkway contractor, Barletta Heavy Division.

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8	-	Will SSTTDC be financially responsible for the costs associated with these changes and will they be required to provide a Performance Guarantee by posting a bond and/or insurance policy?	The work that is the subject of the ESD is within the Parkway contractor's scope of work and is being paid for by SSTTDC from the Phase I Parkway budget. The Parkway contractor has posted a bond for its work pursuant to the contract.
9	-	There exists what I would consider rather serious issues with regard to the levels of methane gas present at the site. Will there be signs posted to the potential hazards?	Navy is responsible for the methane exceedances and is currently undertaking remedial actions in that regard, which are the subject of a separate ESD. The remedial actions are designed to eliminate any unacceptable risks posed by the methane.
10	-	Is the constructed wetland proposed as stormwater treatment acting as a retention pond of sorts? If so, is this the only component to the treatment train? It seems very limited.	The constructed stormwater wetland has been designed in accordance with the Massachusetts DEP Stormwater Management Standards as a stormwater treatment BMP. The treatment train includes deep sump hooded catch basins, a sediment forebay, and the constructed stormwater wetland. This treatment system has been designed to remove 89% total suspended solids (TSS) and has been adequately sized to treat the required water quality volume.
11	-	Is all the stormwater runoff being treated in compliance with all applicable regulations? Have the pre and post volume of flow rates and elevation of the seasonal high groundwater in relation to the bottom of the wetland / retention pond been evaluated?	<p>The constructed stormwater wetland has been designed in accordance with the Massachusetts DEP Stormwater Management Standards as well as the South Shore Tri-Town Development Corporation stormwater regulations.</p> <p>Pre- and post- flow rates were evaluated. The post- development flow rates are less than the pre- development flow rates for the required 2 year and 10 year storms, as well as the 100 year storm.</p> <p>The constructed stormwater wetland has been designed at an elevation to provide adequate water levels to maintain marsh vegetation. This has been analyzed with a water budget using the thornwaite method.</p>

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12	-	This particular section of the project would seem to be an Outstanding Resource Area. What are the regulated setback distances from the wetlands and from Old Swamp River? Is the disturbance area caused by the construction of the Parkway in compliance with all applicable regulations?	<p>The regulatory “set back” or Riverfront Area on the Old Swamp River (OSR) being a Perennial River is 200 feet. All work associated with the roadway and bridge, the restoration of the river channel, and the wetland replacement area, which occurred within the 200-foot Riverfront Area, was submitted to the Conservation Commission for review and was approved in accordance with the Wetlands Protection Act and the SSTTDC Wetlands Protection Bylaw.</p> <p>Since the OSR is a tributary to a public water supply reservoir (Whitmans Pond in Weymouth), it is by definition an Outstanding Resource Water (ORW). This project is approved and in compliance with all applicable regulations associated with ORWs, including the requirement to keep point source discharges 200 feet away from an ORW.</p> <p>The disturbance area caused by the construction of the Parkway is in compliance with all applicable regulations.</p>
13	-	Will salt be prohibited on this section of the Parkway? Snow removal was not mentioned. Even with some of the proposed construction remedies in place, it appears that snow plowed from the roadway will result in untreated runoff being discharged into Old Swamp River, which is an Outstand Resource Water / Class-A water supply.	SSTTDC intends to establish a no salt zone for a section of the Parkway near Old Swamp River. However, should conditions warrant; sand additives will be used to ensure safe driving conditions for motorists.
14	-	The Land Use Controls used as the RDA were meant to be permanent but it would appear that “permanent” controls put in place may not be so permanent after all.	Please refer to the response to Comment #6.
15	-	Why did the SSTTDC Contractor choose to design this section of the Parkway so incredibly close to a capped hazardous waste landfill, finding it necessary to remove the LUC post and rail fence and gas probes to accommodate the design? Why would they decide to take unnecessary risks that could jeopardize the integrity of the site, not only by the construction process, but also the possible associated flooding impacts that could adversely impact the landfill and ultimately Weymouth’s water supply?	The Parkway alignment was designed to pass between the RDA to the south, and the wetlands and eastern box turtle habitat to the north. Any impacts within the LUC boundary are temporary in nature and will not disturb or otherwise interfere with the integrity or function of the remedy. The work described in the ESD will have no impact to flooding or Weymouth’s water supply.
16	-	I couldn’t help but notice some of the language used to describe the proposed work activities, such as “if”, “should”, “shouldn’t”, “may”, and “assume”. When I see these words used all together, lacking what I consider real surety, what I hear is “TRUST ME”. And to be honest, it’s somewhat difficult at times to trust a self-regulating authority like SSTTDC.	Navy and EPA are the regulators with respect to the RDA LUCIP.

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No.	Sheet	Comment	Response
<b>Dominic Galluzzo: 12/7/11</b>			
1	-	During the November 10, 2011 Restoration Advisory Board meeting the proposed location of the East West Parkway was presented. Its location relative to the capped Rubble Disposal Area (RDA) Superfund site, bordered on the back side by Old Swamp River is contrary to section 1.4 of the Explanation of Significant Differences Operable Units 2 and 9 drafts. It is another example of the South Shore Tri Town Development Corp. environmental insensitivity and total disregard of the contamination containment efforts by the Navy.	The location of the Parkway is correctly described and shown in the ESD.
2	-	<p>The capping of any and all superfund sites has been declared the protective action from the harmful contaminates under the cap as long as the cap was not compromised by nature or man.</p> <p>The persistent total disregard of the Navy's cleanup/containment effort should place compensation of long term health issues connected to contamination squarely on the shoulders of SSTITDC, VHB and the Barletta Construction Company.</p> <p>A significant accrual account must be established now, funded by the entities identified above, defined as the funding mechanism to pay for any long term health issues by those responsible for compromising the integrity of the RDA cap, rendering the Navy harmless of any health issues that may arise in the long term future..</p>	The LUCIP prohibits activities or uses of the site that would disturb or otherwise interfere with the integrity or function of the remedy. While the removal of the metal culvert and associated grading is located within the LUCIP boundary, the work is located outside of the soil cap itself, and will not alter any remedy components or jeopardize the effectiveness or integrity of the remedy. The Cap will not be compromised in any way.
3	-	The deliberate compromising of an already installed containment cap (2008) ignores the accepted scientific data, identifies the "for profit only" mindset of SSTITDC/LNR and degrades the Navy clean up standard. It is contrary to the August and September 2011 allegations of the Weymouth Town Council that the Navy was not adhering to the original clean up agreement. It is apparent that SSTITDC/LNR lives in a glass house and should not be throwing stones.	Because the metal culvert is located outside the limits of the cap, the cap will not be compromised by the work described in the ESD, nor will the work negatively impact the integrity or effectiveness of the remedy.

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4	-	The number of recent weather related crisis's and record breaking events dictates that major weather related events must be an integral part of the design. Ignoring the five, ten, fifty and or hundred year weather events, whose unrelenting power can spread contamination via this compromised cap to the adjacent Old Swamp River which feeds into the Weymouth drinking water supply, must be addressed. Historic man made environmental calamities, i.e. the New York Love Canal and the Woburn, MA W.R. Grace fiascos clearly demonstrate that untested theories are no longer acceptable in the attempt to define the outer limits of safe development.	The work described in the ESD will have no effect (adverse or otherwise) on the cap.
5	-	Written communication dated October 13, 2011, a Summary of Comments from EPA and MADEP to VHB and responses to those comments by VHB are further evidence that fuels the concerns expressed above. Given that 90% of the regulatory agencies comments (17 out of 19) suggests that further review is needed and 95% (18 out of 19) of the responses by VHB either agree with the regulators comments or suggests that their comments be withdrawn are the facts that should prevent the proposal from going any further.	EPA and MassDEP have reviewed and accepted the responses to their review comments as well as the revised ESD, which reflects the agreed upon changes.
6	-	The weakness of the proposal begs one to ask, "How incompetent must one be to be dismissed?" or "Is this another politically motivated maneuver to ignore the obvious health risks to the masses for the financial benefit of a select few?"	The regulators have accepted the revised document.
<b>Mary Parsons: 754 Union Street, Rockland, MA 02370 – 11/28/11</b>			
1	Pg 8, 2 <sup>nd</sup> par	"All excavation activities are assumed to be outside the soil cap boundary, however, some grading and filling within the cap boundary may be needed which should not affect soil cap integrity." The consultant should have designed this parkway so as to not impact the soil cap and the perimeter of the institutional controls of the RDA superfund site. They can re-design the section of the parkway away from the RDA.	The sentence cited by the commentator to the effect that there may be some grading required within the Cap boundary was included in the ESD as a precaution in the event that actual field conditions differ from the as-builts. The material that would be graded is crushed stone, so the need to grade it will have no negative impact on the remedy's integrity as it will be restored to its original condition. The sentence will be rewritten to be more precise. The work described in the ESD will not impact the cap in any way.

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2	Pg 8, 2 <sup>nd</sup> par	4th sentence of this paragraph: All excess runoff from the parkway should be directed to the enclosed drainage system. What about runoff from the parkway where the culvert to Old Swamp River is located. How will you control the untreated parkway runoff closest to the swale that goes downward to Old Swamp River? It appears the parkway runoff from storms will be going into the RDA swale.	All Parkway stormwater is contained by granite curbing or HMA berms, conveyed into catch basins, transported to the constructed stormwater wetland, and treated in accordance with all appropriate regulations. No parkway runoff will go into the RDA swale.
3	Pg 9, 1 <sup>st</sup> par	Page 9, 1st whole paragraph, 5th and 6th sentences: "The geotextile fabric located underneath the RDA soil cap extends beneath the northern swale to beyond the centerline of the swale. If the geotextile fabric is impacted by the proposed work, it will be repaired or replaced. There isn't much room between the centerline of the riprap and the post and rail fence. Are the contractors only working on the outside of the post and rail fence? If not they will breach the soil cap and the gas probe in the northern section of the RDA.	The paragraph is correct as written. The Contractor will not impact the soil cap, and any damage to the portions of geotextile located beyond the soil cap will be repaired to ensure the current limits of geotextile are maintained.
4	-	What are the setbacks for the Parkway?	The setback distance between the LUC boundary and the edge of roadway varies from 18ft at Sta. 109+00 to 4'-8" at Sta. 110+50.
5	-	Both maps (dated October 20, 2011) state the project is located in Rockland, MA. The project is located on the former NAS South Weymouth as the list of property owners in the East-West Parkway- Phase I Notice of Intent, South Shore Tri-Town Development Corporation, Massachusetts, states. The Town of Rockland is not listed as a property owner or abutter. Correct this.	This has been corrected.
6	Sec 3.0, 5 <sup>th</sup> par	"The timber guard rail will be removed from Sta. 109+63 easterly to its end." Where is 109+63? The markings on the silt fence on the post and rail fence have long since disappeared. The silt fence had been destroyed by work on the roadway. There were places where it was completely torn down and never replaced until this week.	The locations where the timber guardrail will be removed are marked on the guardrail post at location 109+63.14.
7	-	The maps aren't acceptable and the map they claim is the "existing conditions" is false. The lighting fixtures for aircraft are the wrong ones. The objects on the lighting road never existed. This section of the east-west parkway exists in the former Naval Air Station South Weymouth; not the Town of Rockland like the map suggests. The Town of Rockland does not have authority in this section of the Naval Air Station South Weymouth.	The aerial photography used on the presentation maps was not altered, and was obtained from reputable public sources. Any references to the Town of Rockland will be removed.

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8	-	The "proposed map" as well as the "existing conditions map" has insufficient explanations. This is unacceptable. You have "proposed a wetland replication area" where you wiped out the wetlands and CVP#3382. "The proposed constructed storm water wetland" is already a wetland. You do not show the bridge (which is in close proximity to the Old Swamp river bridge) over this wetland. There were fifteen light fixtures between Old Swamp River and this bridge.	See prior response. No wetlands were impacted to construct the stormwater wetland, nor the wetland replication area. The limits of both were designed to stay outside of the existing wetland limits.
9	-	This parkway can be moved so as not to impact the Rubble Disposal Area Superfund Site. The RDA superfund Site has been known to the developer before any design of the parkway existed.	The alignment of the roadway was designed and approved by all applicable permitting agencies to minimize impacts to regulated wetlands, upland eastern box turtle habitat, and the RDA. Moving the roadway to the north would create unacceptable impacts to regulated wetlands.
10	-	Before work began on the parkway a stick was placed along the RDA post and rail fence that said "T6P - 51 left center of roadway.	The marking showed layout for construction.
11	-	There is a total disregard, by the contractor, for the RDA superfund. They place their heavy equipment on the post and rail fence. Why would anyone think the contractor will preserve the integrity of the RDA superfund site? They throw their rubbish everywhere. Are they going to clean up every soda can and lunch container or are they going to make the entire area a landfill? Please remove the chair that was placed on the outside of the post and rail fence and then placed inside the RDA post and rail fence. This chair without a seat appeared with the work on the parkway.	The Parkway contractor does not place heavy equipment on the post and rail fence. The work zone is inspected daily by SSTTDC's construction manager, STV, and any issues are brought immediately to Barletta's attention and remedied. Trash is picked up on a regular basis.
12	-	Replacing the post and rail fence with a steel guardrail will require the contractor to work within the RDA and may compromise the remedial action on the Rubble Disposal Area. Since the RDA will be compromised by work in the area of the cap, the SSTTDC and contractor should share responsibility for the cost of replacing the post and rail fence as well as placing a steel guardrail for the road in place. The SSTTDC should be responsible for future maintenance and cost of repairing the RDA swale since they are the ones who want to breach the integrity of the swale and possibly breach the RDA soil cap. The SSTTDC contractors should have designed this road to not impact the Rubble Disposal Area superfund site.	See prior response. The RDA remedy will not be compromised, construction of the Parkway does not violate the LUCIP, and the work that is the subject of the ESD poses no threat to the effectiveness or integrity of the remedy.

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13	-	Under Remedy Selected in the 2003 ROD: Last paragraph, 1st and 3rd sentence; additional PCB-impacted soil and Petroleum-impacted materials should be listed under 2.1 Site Description and History in the second paragraph next to last sentence with materials observed at the site.	PCB and petroleum impacted materials were found by means of soil testing, not by the visual means described in the "materials observed at the site" paragraph.
14	Sec 3.0	<p>The institutional controls list certain restrictions that would ensure the integrity of the soil cap on the RDA. One of the controls is the fencing around the RDA. The Plan to remove the post and rail fence and replace it with only a steel guardrail is unacceptable. This is not a Mass DOT designed or constructed parkway (Mass DOT dated 11, 14, 11).</p> <p>The steel guardrail fence is to keep vehicles from leaving the parkway by accident. It is possible for a vehicle to flip over the steel guardrail fence and land in the RDA.</p>	The post and rail fence visually delineates and identifies the limits of the LUC only. The proposed steel guardrail will maintain that visual delineation, and is more protective than the post and rail fence.
15	-	This is an SSTDTC, through their consultant, designed parkway; therefore, it can be moved a few feet to the north to avoid any intrusion to the Navy post and rail fence.	See response to Comment #9.
16	-	Please change: "As shown on Exhibit A, a total of four 10 foot diameter corrugated metal conduits are located below the current gravel roadway and are used to convey water from the southern wetland area to the northern wetland area. The main purpose of the culverts is to convey the flow of Old Swamp River.	This statement will be rewritten to provide a name to the waterway being described.
17	-	The soil cap of the RDA may be disturbed and the riprap will be significantly disturbed. The Parkway should have been designed to take into account the existence of the superfund site, Rubble Disposal Area and should have been designed to not impact the superfund site.	See response to Comment #9.
18	-	Fifth paragraph, first sentence: "A portion of the timber guardrail that was installed during the implementation of the ROD for the RDA will need to be removed for construction of the project." The RDA superfund site was known long before an idea of having a parkway through this area ever existed. There is no excuse for the consultant not taking the existence of the RDA into account before starting construction of the east-west parkway.	See response to Comment #9.

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19	-	Snow plowing and ice melt isn't addressed at all. If you don't have room for the three fences, how will you have room for snow plowing? Will road salt be used?	The location of the proposed guardrail will not impact SSTTDC's future snow removal operations. SSTTDC intends to establish a no salt zone for a section of the Parkway near Old Swamp River. However, should conditions warrant, sand additives will be used to ensure safe driving conditions for motorists.
20	-	With all the hoopla over unrestricted use coming from LNR (through their director of recreation) and public officials, it's hypocritical of them to breach a restricted capped superfund site for their convenience.	The RDA cap will not be breached during the construction of the Parkway.