



# Naval Air Station South Weymouth, MA Restoration Advisory Board (RAB) Meeting Minutes July 8, 2010

## 1. INTRODUCTIONS/ APPROVAL OF PRIOR MEETING MINUTES

John Goodrich, RAB facilitator, opened the meeting at approximately 7:00 PM. He requested that all attendees, including RAB members, regulators, and audience members, introduce themselves. He noted that the meeting agenda, handouts, and the sign-in sheet were available on the front table. The sign-in sheet for the meeting is provided as Attachment A to this meeting summary. J. Goodrich asked if everyone had time to read the minutes from the May 2010 RAB meeting and if there were any comments. There were no comments on the minutes.

J. Goodrich reviewed the guidelines for the meeting and reminded the meeting attendees that the focus of the meeting is cleanup issues. Any issues and/or comments not related to base cleanup will be noted and referred to the appropriate agency or organization. He reminded the participants when asking questions to wait to speak until they are acknowledged, to state their names and affiliations, and to speak clearly or into the microphone when they have questions.

He then reviewed the agenda for the meeting. The meeting agenda and the Action Item Tracking List are provided as Attachment B to this meeting summary. In accordance with the agenda, the presentation and discussion would be followed by the Updates and Action Items portion of the meeting.

## 2. PRESENTATION

J. Goodrich introduced Ron Kenyon of Shaw Environmental, Inc to give a presentation about the planned removal action at the Main Gate Encroachment Area. Selected slides from the presentation are provided as Attachment C.

R. Kenyon stated that the Main Gate Encroachment Area is located at the intersection of Shea Drive and Route 18 (Slide 2). This project is similar to the AOC 55C soil removal action. Background information about the site is provided on Slide 3. Navy acquired the property in the early 1980's; the encroachment was noted by LNR during the 2007 Southfield entrance area construction. A site reconnaissance and records review were conducted in spring 2007; an asphalt parking area with equipment, debris piles, and empty drums were noted on Navy property. A site investigation was conducted from January to March 2008. The results are similar to the contaminants found at AOC 55C, including polycyclic aromatic

hydrocarbons (PAHs) and pesticides in site soil and ditch sediment. No groundwater impacts requiring remediation were identified. A Non-time Critical Removal Action was selected to reduce potential risks.

He then reviewed the project tasks (Slide 4). The first step is to prepare a work plan describing the proposed removal action. Site preparation, including installing a silt fence, clearing and grubbing, and construction of the access road and site storage areas will then be conducted (Slide 5). Slide 6 shows the layout of the project and the excavation areas. The next step is excavation of soil and debris. If large debris is encountered, it will be set aside for eventual disposal at a landfill. Waste management will include moving the excavated soil and storing it in a staging area constructed with a liner and surrounded by hay bales. Waste characterization samples will be collected from the stockpile to determine the level of contaminants and the appropriate disposal option. Based on the current data, none of the soil would be considered hazardous waste, so it will most likely be disposed of in a RCRA Subtitle D (e.g. non-hazardous waste) landfill. Confirmatory samples will be collected from the excavations for quick turn-around analysis (3-5 days) and then the site will be either restored or excavation will continue until confirmatory sample results are acceptable, indicating that the remedial goals have been met.

The site will be accessed from the back side (see Slide 6). Some stone will be added to an existing road and the stock piles will be located in that area. The excavation tasks are summarized on Slide 7 and the waste management tasks on Slide 8. Excavation in the upland area will be to a depth of approximately 2.5 feet and 1 to 3 feet in the ditch. If the remedial goals are exceeded at these depths based on the confirmatory sample results, then the excavation will continue. Approximately 1700 cubic yards will be removed. The soil pile will be covered while waste characterization is underway. The soils will then be loaded in trucks for off-site disposal.

The confirmatory sampling plan is standard for this type of work (Slide 9). Sampling will be conducted only after visual removal limits are reached. Then one 4-point composite will be collected every 40 feet of sidewall. One 4-point composite will be collected every 1000 square feet of floor area. The samples will be analyzed for PAHs and pesticides only and the results will be compared to the established project remedial goals (RGs).

This site is not as ecologically sensitive as AOC 55C. The site restoration activities are shown on Slide 10. Backfill from off-site borrow areas will be tested to ensure it meets the appropriate criteria prior to restoration. The area will be backfilled and graded to pre-removal elevations and topsoil will be placed on top. A native grass seed mixture will be used. The restoration will be monitored and growth progress will be reported for two seasons. In addition, landscape fabric will be placed in the ditch to prevent erosion while vegetation grows. The work in the ditches will be completed when they are dry, as they collect storm water.

Navy is reviewing the work plan now; it should be going to the regulators and other reviewers in August-September. The soil removal is planned for October. The removal action should be completed within a month and site restoration should occur in November. The final report is expected in January.

M. Parsons asked how much of the Navy property has been encroached on: approximately 25 to 30 feet. D. Barney stated that the Navy obtained the land in the early 80's for the main gate of the Base. She then asked where the site access road is. R. Kenyon stated that it is off Trotter Road, past AOC 55C. M. Parsons asked why Route 18 was not being used for access. D. Barney explained that there would be too much traffic and would require a police detail. It is not as efficient and not as safe. They will exit out of the work area using the light at Route 18. M. Parsons expressed her concern about the wear and tear on the road from 18 wheelers.

J. Cunningham expressed his concern about removal of the woodland and natural wildlife habitat and then only replacing it with grass seed. He asked why this is necessary. D. Barney responded that the removal is occurring because the contaminants created an unacceptable risk. The goal is to leave this site with no further action and no long term monitoring. J. Cunningham asked about planting some trees. D. Barney stated that the plan is still in review and they will work with SSTTDC on the restoration plan. P. Scannell stated his concern about SSTTDC helping with plantings. Is this an AOC? How does this compare to the WGL? D. Barney responded that it is an AOC and the size of the WGL is approximately 85,000 cubic yards while the Main Gate is approximately 1,700 cubic yards.

P. Scannell asked if they knew the origin of the pesticides. D. Barney stated Navy has analyzed for pesticides at almost every site on the Base. He noted that pesticide application occurred across the Base, including aerial application of pesticides and herbicides.

H. Welch asked if the topography will be raised after the excavation. D. Barney responded yes; a berm will be created between the Navy property and the adjacent property so runoff from that site does not re-contaminate the Navy property.

M. Parsons asked if the Navy will work with SSTTDC directors on the restoration plan. D. Barney replied that Navy will work with Jim Young. The landscaping currently planned is a native NE grass seed mix; SSTTDC, DEP, and EPA will be consulted as the plan is finalized. This site is different than AOC 55C because it is not a wetland.

D. Galluzzo stated his concern that there is no groundwater impact at the site, but the decision is to remove the soils. Why not cap the soils like at WGL? D. Barney responded that Navy could have

capped the area but this would require long term monitoring (LTM) for years. Navy is trying to minimize the number of sites requiring LTM and future expenditures by the Navy. The removal is beneficial to the Navy. There is a small upfront capital cost for the Main Gate removal, unlike WGL where it is more expensive to remove all the soils associated with the landfill. The proposal for the WGL is a cap with a very impervious liner, multiple layers of soil, gas venting, and fence installation with signage.

D. Galluzzo asked, money aside, is the health risk minimal at MGEA compared to WGL. He feels concerns for health are being ignored at WGL. D. Barney stated that he disagrees; he does not believe that Navy is ignoring the community's health concerns. He doesn't find inconsistencies between the sites. They are two different sites that are benefitting from two different approaches. Navy cannot eliminate the cost consideration. He added that there are no groundwater impacts at WGL either.

M. Parsons asked why the soil is going off the Base instead of to WGL. D. Barney said it is an issue of timing and it is reasonable approach.

M. Parsons asked if the Small Landfill is capped. D. Barney stated it is in the process of being capped.

R. Kenyon added that Shaw had a slideshow of Small Landfill construction activities.

M. Smart asked who sees to it that trucks are logged as they come in and out. R. Kenyon responded that Shaw only uses approved contractors for work. They must have \$3 million in liability insurance, a clean health and safety record, a clean driving record, and must be financially acceptable to be a subcontractor for Shaw. Every truck is weighed (empty) before it comes to the site. It is then weighed again at the landfill/disposal facility. Under MADOT and federal guidelines they must complete shipping paperwork, especially if transporting hazardous wastes. This accounts for potential spills, as well. The paperwork gets sent back with the weight upon arrival at the disposal facility. All this documentation goes to the Navy and the regulators in the final report.

H. Welch asked if the soils were considered not hazardous. R. Kenyon confirmed that the soils are not hazardous under EPA standards. B. Olsen stated that the definition depends on contamination levels and risk. The soil can be contaminated but the levels may not reach the hazardous threshold levels.

H. Welch asked whether the soils have a tarp on top of them. R. Kenyon stated they will.

D. Galluzzo asked why the state has its own standard and why is it ignored. D. Barney stated that the state standard is not ignored, and the state has its own standard because not all sites are regulated by the EPA. B. Olsen noted that it is a complicated issue. Once a site reaches an unacceptable risk threshold then the state regulations apply, until they reach the level at which the federal regulations apply

(Applicable or Relevant and Appropriate Requirements [ARARs]). The more stringent regulations will be applied at any site. The EPA decides the risk at Superfund sites. A. Malewicz added that the state will compare their cleanup numbers with EPA. CERCLA looks at risks associated with children, adults, etc. and calculates their risk numbers based on the actual use of the land. The state system either uses established cleanup numbers (for commercial or residential use) or contractors can do a state risk assessment, which is similar to CERCLA. The risk assessments are designed to be extremely conservative, especially when risks to children are evaluated.

M. Parsons wanted clarification on who does the oil/hazardous material sites. A. Malewicz responded that CERCLA does not cover oil and defers to the states. The CERCLA petroleum exclusion was established years ago. The DEP works on a lot of petroleum sites; there are customized, conservative numbers for petroleum sites.

P. Scannell asked if it becomes a problem with the state coming onto federal land. B. Olsen stated that if the state tried to take actions the federal government can step in. P. Scannell asked about the risk of not just single contaminants, but the risk of the combined contaminants at any given site. B. Olsen stated that EPA tries to create individual contaminant numbers conservatively enough to take this into account, but it is a good point.

### **3. UPDATES AND ACTION ITEMS**

#### Action Items:

D. Barney noted that a turtle update was included in the June update handed out at the RAB meeting. Turtle biologists associated with the Parkway project have visited the Small Landfill. The turtle program was suspended over the winter, but is continuing. They verified that three turtles they found with transmitters near the Small Landfill were alive and well. The turtle biologists were comfortable with the precautions being taken at the site. One identified turtle had eggs and was looking for a place to nest. The monitoring program is in place through the Base re-development process (no longer a Navy program) and will continue through the development of the Parkway.

D. Barney provided an update on the proposal to consolidate STP and AOC 55C soils at WGL. Additional samples have been collected from the soil piles for a different analysis, at the request of EPA and DEP. The Navy is revising an Explanation of Significant Differences (ESD) which will provide a regulatory basis for approval to transport and consolidate soils to the WGL. The Navy believes this is a good alternative, though it is not the original plan, but the timing is right and they have the ability to consolidate this soil. It is a positive effort which would keep trucks off Route 18. The revised ESD will hopefully be submitted within 2 weeks and be out for comment in July.

M. Parsons asked when the soil transfer will take place. D. Barney stated that maybe early September; the plans are still being worked on. M. Parsons asked if you could use the soil from encroachment area. D. Barney stated that the timing isn't right to use it at the WGL.

P. Scannell asked why the Small Landfill was capped if it was wood, debris and metal. D. Barney stated that it is a solid waste landfill that was not properly closed under state regulations and so it is now being capped. Long term (30 years) monitoring of soil gas and groundwater will occur. R. Kenyon added that it is not the same cap as planned as WGL, it is not as extensive. A. Malewicz noted that it was picked up under a state program because of the debris.

H. Welch stated his concern over moving contaminated soils to another area of contaminated soil. It doesn't make sense, why not remove it offsite. D. Barney agrees that it is a different approach to what was planned, but he thinks this is an appropriate way to manage the waste coming from these two areas. It was not in the plans before because it is a construction timing issue. Originally Navy was funded to remove the soils offsite. The Navy could spend a lot of money to remove the soils. They are considering a cost effective way to manage the soil and keep soil off the streets, eliminating truck traffic. H. Welch stated his concern that it is contaminated soil; when it was dug up it was recognized that it had an unacceptable risk. D. Barney stated that the soil is below the contamination levels that would make it a hazardous waste but the soil contaminant levels created an unacceptable risk. A. Malewicz added that there are various levels of risk; the soils have a residual amount. This means that the soil cannot stay at the sites because of potential exposure to the public. The soil will be disposed of at a landfill, whether it is offsite or used at the WGL.

D. Barney clarified that the soils would be going under the cap and over WGL material with contaminant levels that are higher than those in the STP and AOC 55C soils. In addition, there is a consolidation process ongoing as part of the WGL remedy. A. Malewicz noted that the WGL design will be like sandwich layers. There will be the more contaminated WGL material on the bottom, the less contaminated STP/AOC 55C soils, and then an impermeable cap.

P. Scannell understood it would help by eliminating 320 truck trips and containing the liability to Weymouth only. The three towns voted on the removal of these soils. He is concerned with the geothermal effect of radiant heat under the cap. What effect will this have over time and will it change the groundwater/gas chemistry under the cap. Is this a done deal? Has everything been evaluated and risk/reward been determined? D. Barney responded that it is not a done deal and they are continuing to look at. The Navy would appreciate feedback once the ESD is issued. The ESD process provides an opportunity to change the remedy.

B. Olsen acknowledged the communities' concern for more information. EPA has asked Navy for a public comment period on the ESD, which they didn't have to do. EPA believes this is a good idea. It makes more sense to use this material instead of shipping soils in and shipping these soils out. With regard to the geothermal questions, issues do exist with contaminants and landfill capping, but the contaminants at the WGL, and the fact that there is no significant groundwater contamination at the site, indicate that the addition of this material will not alter the chemistry and should not cause a problem. In addition, long term monitoring will be in place. This is a small amount of material compared to the material already present at WGL. It also makes financial sense and saves truck travel on local roads. The EPA believes it makes sense and it is safe and they hope the public takes that into consideration when looking over the Navy's ESD.

M. Parsons stated that it seems like it has already been decided so she feels the 15-day comment period is a waste of time. Since you're saving money, why not put a chain link fence around WGL. Where is the water runoff going? D. Barney stated that the majority of the runoff will go into the wetlands and not into French's Stream. M. Parsons stated that she is concerned about soil erosion of the cap over time and that people will have access to the cap if a wood fence like that at the RDA is used. D. Barney replied that they have taken that into consideration with LTM. Inspections will be made periodically to determine if erosion or settlement is occurring and sediment accumulation in the drainage channels will be evaluated. This will be similar to what is done at the RDA. The fence is to keep motorized vehicles out.

M. Smart wanted to express his disappointment about making the WGL decision based on value engineering. He believes that value engineering comes at the cost of the public safety. B. Olson wanted to clarify that he said it was safe, as well. No matter what, the soils will be used as landfill cover at some location; this just saves the taxpayer's money. D. Barney stated that value engineering was not in his vocabulary until recently and he agrees that this is a change of plan. Value engineering identified the current consolidation proposal from the standpoint of the opportunity it represents. If he didn't feel that the WGL project was moving forward in a positive way, the Navy would drop it. The Navy does not believe that by employing the value engineering process they are cutting corners, especially on safety, but yes there is a cost benefit as well. That money can be applied to other projects at South Weymouth instead of waiting for money to move forward. R. Kenyon stated that Shaw introduced idea of keeping diesel trucks off the road. People want to see the CO<sub>2</sub> emissions decreased.

M. Smart stated that he had heard no mention of watering down the soils while moving them and washing down the trucks. R. Kenyon responded that Shaw employs the best construction practices at all times and that these steps will be taken. OSHA requires it.

P. Scannell stated his frustration about being told one thing and something else happening. He appreciates the opportunity for public comment. B. Olsen added that their opinions do carry weight and it would be helpful for the TAG consultants to offer their opinions, as well.

J. Cunningham indicated that he likes the plan to move the STP soil to WGL. It makes sense since it will be carefully regulated, theoretically above groundwater, and contained. So why not do it rather than moving it elsewhere in another town.

D. Galluzzo asked the acreage of the WGL. D. Barney stated that it is about 6.4 acres. The cap will cover it all? D. Barney responded that the cap will be smaller than that because the waste will be consolidated prior to capping. Approximately 5.25 acres will be capped.

D. Galluzzo asked how much will be saved by using STP soil for the cap. He expressed his concern over a split rail fence. You should not want people on this cap. He urged the Navy to spend the saved money on a tall chain link fence. D. Barney stated that the post and rail fence is actually more expensive than a chain link fence. A chain link fence is not necessary. The post and rail fence keeps out vehicle traffic, while still allowing wildlife access. B. Olsen reminded everyone that the RDA fence was changed to a post and rail fence after a public comment period.

D. Galluzzo asked why not take soil on the Base that is clean and put it in the hole that is created. R. Kenyon said that it was not suitable for construction.

H. Welch asked why the STP soils weren't removed when they were supposed to have been. D. Barney stated that it was not done last fall due to the confirmatory sampling process. Additional excavation and confirmatory sampling continued to Feb/Mar of this year. They had to wait for all of the soil excavation to be completed before they could collect samples for waste characterization. At that point in time they had begun the design for the WGL and value engineering identified the alternative use for the STP soils.

J. Marques asked how the incoming 'clean' dirt is recorded. R. Kenyon stated that everything they use during construction is tested before coming on to the site and found suitable (environmentally clean). They went to three to four borrow pits before they found soils suitable for AOC 55C.

D. Barney stated that the EBS reports were provided to the TAG advisor. He suggested that the TAG consultant might review the ESD and soil consolidation for WGL.

M. Parsons asked how far down were they going to shrink the waste under the cap. D. Barney stated the WGL consolidation is primarily from the wetland side. They will have to go down as far as the debris goes. It will be a gradual grade that they have to pull back. M. Parsons asked whether the Navy will get

all the debris or just get what is convenient. Why not put the cap on the actual size of the landfill. D. Barney stated that all of the debris will be consolidated; pulling the debris out of the wetland will actually create wetland area. The Navy is not saving money by pulling the debris out of the wetlands. D. Galluzzo asked what the height of the berm at the WGL will be. The berm will be 10 to 12 feet maximum. D. Galluzzo stated his concerns over the dimensions. B. Olson clarified that the Navy is not saving money; it costs more to get it out of the wetland. The EPA requested that the debris be removed from the wetlands. P. Scannell asked the function of the dome. B. Olson stated that the function of the cap shape is for runoff, which will go to the wetlands.

MassDEP Update: None.

IR/EBS Program Site Update: Slides were also presented of the update items.

AOC 55C was a removal action in the wetlands area. It has been backfilled with soil that met the state and Army Corps requirements for wetland soil. Plants (420) and brush piles were added based on recommendations from the regulators. Water trucks are in use to keep them viable in this dry period. Seed mix will go down and the silt fence will come out as a last effort.

Slides on the progress of the Small Landfill cap construction were presented. Survey stakes were used to ensure that the appropriate amount of material was being added to the landfill. M. Parsons asked if DEP still requires a chain link fence around landfills. D. Barney responded that the Navy is working with the DEP Dept. of Solid Waste to determine post closure use; some flexibility is allowed. A. Malewicz added that there are options other than fencing as long it is protective. D. Galluzzo wants the Navy to install a fencing barrier to keep people off. P. Scannell stated that it was all about perception. Many areas are safe on the Base, but some are not and it may give a false sense of security. D. Barney stated that RDA in and of itself is not a big draw for kids to play. At best you may walk on site, but it is not conducive to playing. It is passive recreational open space. Navy has a similar vision for these other two landfills. R. Keynon continued with the Small Landfill update. He pointed out that every part of the construction has a QC check.

D. Barney reviewed the items included in the June RAB update, focusing on sites not mentioned during the prior discussions. He stated that additional sampling is being conducted at RDA. The Building 81 RI is being finalized and the FS is being worked on. The TCE found at the Building 82 site looks to be coming from Building 15. The FS for SRA will be submitted shortly which will evaluate a variety of remedial options. The FOST 5C document, covering approximately 33 acres including French Stream, will be issued for a 30-day public comment period in the near future.

### Conclusion/Next Meeting

J. Goodrich wrapped up the meeting.

Suggestions for topics for the next meeting include:

- Landfill discussion

A question was asked when the public comment would be for the ESD. D. Barney responded that Navy will put a note in the paper and send out an email. Navy wants the notice out in 2 weeks. A question was asked who is writing the ESD. D. Barney responded that Tetra Tech is preparing it, on behalf of the Navy.

The next RAB meeting will be the second Thursday in September (September 9, 2010). The meeting will again be held at the New England Wildlife Center, 500 Columbian St., Weymouth, MA.