



DEPARTMENT OF THE NAVY

ENGINEERING FIELD ACTIVITY, NORTHEAST
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO

5090
EV21/MD
16 August 2002

MEMORANDUM FOR THE RECORD

Subj: FINDING OF SUITABILITY TO TRANSFER (FOST), FOR ZONING SUBPARCELS B1-W-1, INST-1, OS-A-1, OS-C-1 and 2, OS-R-1 THROUGH 5, OS-W-1 AND 2, SPUD-1 THROUGH 7, SR-R, SR-W-1, AND SSE (486.75 total acres), AT THE FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS

Ref: (a) South Weymouth NAS Reuse Plan and South Shore Tri-Town Development Corporation Enabling Legislation ("The Reuse Plan"), as approved by the towns of Abington, Rockland, and Weymouth in Mar 98 and as enabled by the Governor on 14 Aug 98.
(b) Community Environmental Response Facilitation Act (CERFA) Determination Report, NAS South Weymouth, Massachusetts of 28 Mar 97.
(c) Final Basewide Environmental Baseline Survey (EBS) Phase I, NAS South Weymouth, Massachusetts of 18 Nov 96.
(d) Phase I EBS Report Errata of 10 Nov 97.
(e) BRAC Cleanup Plan (BCP), NAS South Weymouth, Massachusetts of Aug 98.

Encl: (1) Environmental Baseline Survey to Transfer (EBST)
(2) Environmental Covenants, Conditions, Reservations, and Restrictions
(3) Summary of Installation Restoration (IR) Program Sites
(4) Summary of Massachusetts Contingency Plan (MCP) Sites
(5) Summary of EBS Review Item Areas (RIAs)
(6) Responsiveness Summary Addressing Comments on the Draft FOST for 22 Subparcels
(7) Solid Waste Inventory for the FOST

1. I have reviewed the Environmental Baseline Survey to Transfer (EBST), enclosure (1), for the 22 zoning subparcels that are the subject of this FOST and are designated as B1-W-1, INST-1, OS-A-1, OS-C-1 and 2, OS-R-1 through 5, OS-W-1 and 2, SPUD-1 through 7, SR-R, SR-W-1, and SSE at the former Naval Air Station (NAS) South Weymouth, Massachusetts. The properties are

proposed to be transferred from the Navy to the South Shore Tri-Town Development Corporation (SSTDC). The subject subparcels of this FOST and their planned redevelopment are as follows:

TABLE 1 - SUMMARY OF ZONING SUBPARCELS INCLUDED IN THIS FOST

Zoning Subparcels ¹	Township	Buildings/Structures within the Subparcel	Planned Reuse ²	Area (acres) ³
B1-W-1	Weymouth	None	Commercial	7.00
INST-1	Weymouth	Building 31 (Bachelor Officers Quarters [BOQ]) Building 46 (Garage) Building 49 (Transient VIP Quarters)	Institutional	9.21
OS-A-1	Abington	Building 146 (New Air Traffic Control Tower)	Open Space	30.66
OS-C-1	Weymouth	Building 24 (Dispensary) Building 25 (Dispensary Garage) Building 52 (Magazine-High Explosive) Building 92 (Magazine-Inert) Building 93 (Magazine-Small Arms) Building 94 (Magazine-Pyrotechnics) Building 98 (Boiler House) Building 133 (Main Gate Security) Building 141 (Housing Referral Office)	Open Space	132.53
OS-C-2	Weymouth	Tennis courts	Open Space	1.51
OS-R-1	Rockland	None	Open Space	5.53
OS-R-2	Rockland	None	Open Space	7.49
OS-R-3	Rockland	None	Open Space	26.90
OS-R-4	Rockland	None	Open Space	5.63
OS-R-5	Rockland	None	Open Space	80.36
OS-W-1	Weymouth	Building 32 (MWR Youth Center) Building 85 (Pump House-Water Supply) Building 133A (Main Gate-Security)	Open Space	23.01
OS-W-2	Weymouth	None	Open Space	21.43

Zoning Subparcels ¹	Township	Buildings/Structures within the Subparcel	Planned Reuse ²	Area (acres) ³
SPUD-1	Weymouth	Building 97 (Chapel) Building 113 (Field House Head) Building 121 (Recreation Center) Building 122 (Conference Center) Building 145 (Covered Pavilion)	Special Planned Use District ⁴	10.24
SPUD-2	Weymouth	None	Special Planned Use District ⁴	1.51
SPUD-3	Rockland	None	Special Planned Use District ⁴	16.79
SPUD-4	Rockland	None	Special Planned Use District ⁴	34.34
SPUD-5	Abington	None	Special Planned Use District ⁴	7.44
SPUD-6	Rockland	None	Special Planned Use District ⁴	51.38
SPUD-7	Rockland	None	Special Planned Use District ⁴	3.73
SR-R	Rockland	None	Senior residential	6.87
SR-W-1	Weymouth	None	Senior residential	1.34
SSE	Rockland	None	Not part of redevelopment zoning	1.85

1. The subparcel acronyms are defined as follows: A = Abington, B = Business, C = Clear Zone, INST = Institutional, OS = Open Space, R = Rockland, SPUD = Special Planned Use District, SR = Senior Residential, SSE = Spruce Street Extension, and W = Weymouth.
2. As approved in the Reuse Plan, reference (a).
3. Approximate areas (to be surveyed as part of the property transfer process).
4. As outlined in reference (a) and Exhibit E of SSTTDC's *Zoning and Land Use Bylaws*, the following uses that are permitted in SPUD areas include: Medical, Recreational, Business, Research and Development, Commercial, Industrial, Transportation, Warehouse/Distribution, Communications and Utilities, and Public Infrastructure. For more detail refer to Exhibit E and the list of nonconforming building uses as outlined in the 30 Jun 99 letter issued by Nutter, McClennen & Fish, LLP.

Under the Reuse Plan guiding development, reference (a), 647 of the 1,450 acres of land at NAS South Weymouth are planned for new development. This includes 174 acres for business Research and Development (R&D), 230 acres for retail, 10 acres for Route 18 retail, 35 acres for senior housing, approximately 8 acres for institutional purposes, and approximately 190 acres for a golf course. The remaining property is planned for wetlands, recreation, parks, public roadways, and U.S. Coast Guard housing/facility. The Reuse Plan evaluated land uses and recreation facilities for the open space land, and outlined the implementation program for their creation. The proposed reuse of the properties considered in this FOST is consistent with the recommended Reuse Plan. The conditions within the subparcels of this FOST will not have adverse effects on human health or the environment under the proposed reuse.

2. *The Community Environmental Response Facilitation Act (CERFA) Determination Report, NAS South Weymouth, Massachusetts*, reference (b), was issued on 28 Mar 97 by the BRAC Cleanup Team (BCT) to identify "CERFA-uncontaminated" parcels, which are suitable for transfer by deed. Reference (b) identified the following CERFA-uncontaminated areas [i.e., CERFA Environmental Condition of Property (ECP) category 1] within the subject subparcels of this FOST: Shea Memorial Drive, the runways, the Main Gate area (Buildings 133/133A), portions of the Recreation Complex (Pavilion area, South Ballfield, area north of Building 121), and Buildings 85, 92, 93, 94, and 141. Enclosure (1) summarizes the CERFA ECP categories for the subject subparcels of this FOST.

3. The former NAS South Weymouth is listed on the U. S. Environmental Protection Agency (EPA) National Priorities List (NPL). However, references (b), (c), and (e) and enclosure (3) document that no Department of Defense (DoD) IR Program sites have been or are currently located within the subject subparcels of this FOST. Also, no active sites under the MCP are currently located within the subject subparcels. As described in enclosure (4), Response Action Outcomes (RAOs) have been completed at the three closed MCP sites located within the FOST subparcels. Activity and Use Limitations (AULs) have been implemented at two of these MCP sites [described in enclosures (1) and (2)]. There are no identified impacts to the subject subparcels from the IR Program sites or the remaining active MCP sites at NAS South Weymouth.

4. References (c) and (d) document the results of the environmental baseline survey completed at the former NAS South Weymouth, Massachusetts. The baseline survey was performed in accordance with the *DoD Policy on the Environmental Review Process to Reach a Finding of Suitability to Transfer* of 9 Sep 93 and the *Memorandum of Understanding* Between the USEPA and the DoD of 4 May 94. References (c) and (d) document the history of NAS South Weymouth and identify the current environmental conditions and the potential constraints for transfer of land and/or structures. References (c) and (d) incorporate information from previous environmental studies; visual inspections of property and buildings; information on hazardous substance and petroleum product management practices; descriptions of off-base properties; reviews of maps, plans, and aerial photographs; interviews with current and former NAS South Weymouth personnel; and records, correspondence, reports and other information available from NAS South Weymouth, Northern Division, and the Massachusetts Department of Environmental Protection (MADEP). References (c) and (d) also summarize the results of the radon, asbestos, and lead-based paint (LBP) surveys completed by the Navy and the status of the identified former and current aboveground storage tanks (ASTs) and underground storage tanks (USTs).


5. As summarized in enclosures (1) and (5), sixteen EBS RIAs are located within the subparcels of this FOST. The Navy has received regulatory concurrence on final No Further Action (NFA) decisions for all of these RIAs. There are no identified impacts to the subject subparcels of this FOST from the EBS RIAs located in other areas at NAS South Weymouth.

6. Enclosure (1) summarizes the information on existing environmental conditions at the subject subparcels. Additional information on surrounding properties is available in reference (c). In Table 1 of enclosure (1), each building is categorized with respect to its history and use, indicating whether hazardous materials or petroleum products were stored for one year or more, or were known to have been released, treated, or disposed. The CERFA ECP categories are based on criteria for hazardous substance notice.

7. In accordance with the Federal Facility Agreement (FFA) for the NAS South Weymouth NPL site, this document, including enclosures (1) through (5), shall be made a part of any transfer documents or future leases entered into with any other party for the subject subparcels. References (a) through (e) are available at the Caretaker Site Office (CSO) Information Repository located at the former NAS South Weymouth. Upon closure of the CSO, references (a) through (e) shall be available upon request from the Navy's Engineering Field Activity Northeast, Naval Facilities Engineering Command located in Lester, Pennsylvania. The property transfer document(s) and any future lease(s) shall guarantee a right of access by the Navy and regulatory agencies to conduct environmental studies and investigations and to carry out environmental responses as necessary on these or adjacent properties.

8. I hereby find that the buildings and property at NAS South Weymouth listed in Table 1 of this FOST are suitable to transfer under the terms and conditions of this FOST and are consistent with and for the proposed uses. The record of information before me, which was compiled after diligent inquiry, supports the conclusion that these properties can be used pursuant to the proposed transfer, with the specified use restrictions and conditions in this FOST, with no unacceptable risks to human health or the environment, and without interference from or to the ongoing environmental restoration process. The EPA and MADEP have reviewed this FOST, references (b) through (e), and enclosures (1) through (7). Their comments on this FOST and its enclosures have been incorporated or otherwise addressed. Although no written concurrence was received from MADEP, all their comments have been appropriately addressed to protect human health and the environment. Public Notice of the Navy's intent to sign this FOST was provided in the *Boston Globe* and the *Patriot Ledger* on 31 Mar 01. References (c) and (d) shall be incorporated into the Quit Claim Deed by reference, this FOST and its enclosures shall be included in and made part of this deed, and these documents shall be required to be included as part of any future property transfer(s) or lease(s) entered with any other party.

16 Aug 02
Date



R. B. RAINES
Captain, CEC, U.S. Navy
Commanding Officer
Engineering Field Activity, Northeast

**ENVIRONMENTAL BASELINE SURVEY TO TRANSFER (EBST)
SUBPARCELS B1-W-1, INST-1, OS-A-1, OS-C-1 AND 2, OS-R-1
THROUGH 5, OS-W-1 AND 2, SPUD-1 THROUGH 7, SR-R, SR-W-1, AND SSE
(486.75 TOTAL ACRES),
AT THE FORMER NAVAL AIR STATION, SOUTH WEYMOUTH, MASSACHUSETTS**

Introduction

This Environmental Baseline Survey to Transfer (EBST) summarizes the existing environmental conditions at the subject zoning subparcels at the former Naval Air Station (NAS) South Weymouth, Massachusetts. The EBST categorizes the history of use, storage, or release of hazardous materials or petroleum products, in accordance with the *Department of Defense (DoD) Policy on the Environmental Review Process to Reach a Finding of Suitability to Transfer of 9 Sep 93 ("DoD Policy")*. Descriptions of the locations to be transferred are summarized in Table 1 of the Finding of Suitability to Transfer (FOST) to which this EBST is attached.

As summarized in Table 1 of the FOST Memorandum, this EBST evaluates the existing condition of the land at NAS South Weymouth consisting of the following Real Estate Zoning Subparcels: B1-W-1, INST-1, OS-A-1, OS-C-1 and 2, OS-R-1 through 5, OS-W-1 and 2, SPUD-1 through 7, SR-R, SR-W-1, and SSE (486.75 total acres).

The *Environmental Baseline Survey (EBS) Phase I Report* of 18 Nov 96, the *Phase I EBS Report Errata* of 10 Nov 97, and the *EBS Phase II Sampling Work Plan* of 13 Oct 98, which are incorporated herein by reference, were prepared in accordance with the *DoD Policy* and are the source documents for this EBST. The Basewide EBS reports describe in more detail the site history, the results of record searches, the available information regarding use, storage or release of hazardous substances or petroleum products and the analysis of aerial photographs. The EBST evaluates potential impacts from existing environmental conditions such as EBS Review Item Areas (RIAs), Underground Storage Tank (UST) and Aboveground Storage Tank (AST) sites, and Resource Conservation and Recovery Act (RCRA) storage facilities on the subject subparcels of this EBST.

The following figures are included to show locations of the parcels, buildings, UST/AST areas, and EBS RIAs within the subject subparcels:

- Figure 1 Main Base Location Map
- Figure 2 Subparcels included in this FOST
- Figure 3 Subparcel B1-W-1
- Figure 4 Subparcel INST-1
- Figure 5 Subparcels OS-A-1 and SPUD-5
- Figure 6 Subparcel OS-C-1
- Figure 7 Subparcels OS-C-2, SPUD-1, SPUD-2, and SR-W-1
- Figure 8 Subparcels OS-R-1 and SPUD-3
- Figure 9 Subparcels OS-R-2, OS-R-4, and SPUD-4
- Figure 10 Subparcels OS-R-3 and SR-R
- Figure 11 Subparcels OS-R-5, SPUD-6, SPUD-7, and SSE
- Figure 12 Subparcel OS-W-1
- Figure 13 Subparcel OS-W-2.

Table 1 of this EBST summarizes the history, past environmental activities, and current conditions for the subject zoning subparcels and each building within the parcel. Table 1 is the basis for determining the hazardous substance notification required by the *DoD Policy*. The following documents located in the Caretaker Site Office (CSO) at NAS South Weymouth serve as the basis for the information contained in Table 1:

Polychlorinated Biphenyls (PCB)-Free Activity Report, NAS South Weymouth of 4 Jan 95.

Asbestos, Lead Paint, and Radon Policies at BRAC Properties, Office of the Under Secretary of Defense of 12 Jan 95.

Release Notification and Remedial Action Outcome (RAO) Statement for South Weymouth Naval Air Station, Shea Memorial Drive, Weymouth, MA, RTN 3-13673, ENSR of 14 Jun 96.

Final Basewide EBS Phase I by Stone & Webster Environmental Technology & Services of 18 Nov 96.

Community Environmental Response Facilitation Act (CERFA) Determination Report, NAS South Weymouth, Massachusetts by the Department of the Navy of 28 Mar 97.

Phase I EBS Report Errata by Stone & Webster Environmental Technology & Services of 10 Nov 97.

Lead Remediation Survey by Dewberry & Davis of 97.

Release Abatement Measure Completion and RAO Supporting Documentation Report, Naval Exchange Site, NAS South Weymouth, RTN 3-13316 by Brown & Root Environmental of Jul 98.

South Weymouth NAS Reuse Plan and South Shore Tri-Town Development Corporation Enabling Legislation ("the Reuse Plan"), as approved by the towns of Abington, Rockland, and Weymouth in Mar 98 and as enabled by the Governor on 14 Aug 98.

BRAC Cleanup Plan (BCP) by the BRAC Cleanup Team and EA Engineering, Science, and Technology of Oct 96 (revised Aug 98).

Final Basewide EBS Phase II Sampling Work Plan by Stone and Webster Environmental Technology & Services of 13 Oct 98.

Geophysical Investigation, South Weymouth NAS by Geophysics GPR International of 10 Dec 98.

Removal Action Report for Building 32 AST Removal by Foster Wheeler Environmental Corporation of 7 Jan 99.

Removal Action Report for Building 24, NAS South Weymouth, South Weymouth, MA by Foster Wheeler Environmental Corporation of Jan 99.

FOSL for the White Street Gate Parcel and Associated Parking Area (Building #32) at the Former Naval Air Station South Weymouth, MA of 22 Sep 99.

Finding of Suitability to Lease (FOSL) for the South Shore Tri-Town Development Corporation, Building #141 and Associated Parking Area at the Former Naval Air Station South Weymouth, MA of 30 Sep 99.

RAO Report for NAS South Weymouth, MA, Bachelor Officers Quarters (BOQ) Site (RTNs 3 10239 and 3-10469) by ENSR of 13 Oct 99.

Draft Open Space and Recreation Plan, NAS South Weymouth by Daylor Consulting Group of 19 Nov 99.

LBP Policy for Disposal and Residential Real Property, DoD Memorandum of 7 Jan 00.

Building 46 Asbestos Abatement, NAS South Weymouth, MA by Foster Wheeler Environmental Corporation of 7 Feb 00.

Immediate Response Action Completion and Response Action Outcome (RAO) Report, Building 24 Site (RTN 3-15379) by Tetra Tech NUS of May 00.

Safety and Health Assessment, Buildings 24 and 25 by Applied Environmental of Jul 00.

Finding of Suitability to Lease (FOSL), Building 24 (Dispensary) and Building 98 (Boiler House) of 22 Sep 00.

Potential Immediate Hazards (PIH) Survey and Materials Update for Asbestos and Lead-Based Paint (LBP), NAS South Weymouth, Massachusetts by Dewberry & Davis of Aug 01.

Letter to Mr. David Chaffin, Massachusetts Department of Environmental Protection (MADEP), from Mr. Alexander Haring, Navy EFANE, re: "Status and Plans for Solid Waste Debris Areas within the Navy's FOST at the NAS South Weymouth" of 19 Oct 01.

No Further Action List, Environmental Baseline Survey, Effective 18 Jan 02, as signed by the Navy (1 Feb 02), Environmental Protection Agency (EPA) Region I (1 Feb 02) and MADEP (20 Feb 02).

Final Removal Action Report, RIAs 95A, 56, 7A, 36, 55C, 96A, Deluge Tank, and BBQ Pit/Incinerator Area, Foster Wheeler Environmental Corporation of 23 Jan 02.

Final Phase II EBS Decision Document for RIA 7B, Household Debris Near Fenceline - South, Stone & Webster Environmental Technology & Services of 31 Jan 02.

Draft Phase II EBS Addendum Decision Document for RIA 52, North Ballfield, Stone & Webster Environmental Technology & Services of 25 Mar 02.

Final Phase II EBS Decision Document for RIAs 42, 46, and 51, EA Engineering, Science, and Technology of 11 Apr 02.

Environmental Condition of Property

The following seven CERFA Environmental Condition of Property (ECP) categories are based on criteria for hazardous substance notice established in *DoD Policy*:

1. Areas Where No Release or Disposal (Including Migration) Has Occurred
2. Areas Where Only Release or Disposal of Petroleum Products Has Occurred
3. Areas Where Release, Disposal, and/or Migration Has Occurred, but Require No Remedial Action
4. Areas Where Release, Disposal, and/or Migration Has Occurred, and All Remedial Actions Have Been Taken
5. Areas Where Release, Disposal, and/or Migration Has Occurred and Action is Underway, but All Required Remedial Actions Have Not Yet Been Taken
6. Areas Where Release, Disposal, and/or Migration Has Occurred, but Required Response Actions Have Not Yet Been Implemented
7. Unevaluated Areas or Areas Requiring Additional Evaluation.

ECP categories were first designated during the *Phase I EBS* of 18 Nov 96, the *CERFA Determination Report* of 28 Mar 97, and the *BRAC Cleanup Plans* of Oct 96 (revised Aug 98). Since that time, the Navy has obtained additional information about the conditions at NAS South Weymouth from several environmental investigations under the Installation Restoration (IR) Program, the Massachusetts Contingency Plan (MCP) program, and the EBS programs. This EBST summarizes the current environmental status of the subject subparcels; therefore, this EBST provides the Navy's revised ECP categories for the property contained within the subject subparcels. The ECP categories cited in this EBST supercede the ECP categories for these areas as identified in the *Phase I EBS*, *CERFA Determination Report*, and the *BRAC Cleanup Plan*.

Table 1 of this EBST summarizes the relevant information for the ECP determinations for each subject subparcel and also provides additional details such as subparcel history, buildings, and property use. Further descriptions of the subject subparcels and the environmental sites (IR Program, MCP, and EBS) within and nearby these subject subparcels are provided below. The

figures included with this EBST and the descriptions below provide a general depiction of the subparcel boundaries. As part of the pending property transfer process, the Navy will complete a survey legal description to accurately delineate the extent of the property being transferred.

Subparcel B1-W-1

As shown in Figure 3, Subparcel B1-W-1 includes approximately 7.00 acres in the northwest portion of the base. This subparcel has been zoned for business reuse as described in the *Zoning and Land-Use Bylaws, NAS, South Weymouth*, 24 March 1998. Currently, the subparcel consists of forested open space and wetlands along the base fenceline. There are no buildings or structures within this subparcel. The northern and western boundaries of the subparcel extend to the Navy's property line, which may or may not be equivalent to the current base fenceline (i.e., it is likely that the current fenceline is set back a few feet from the actual property line). The subparcel does not include French Stream (20 ft setback on both banks of the stream).

No IR Program sites, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel:

- RIA 62 (French Stream) - This subparcel is set back 20 ft from French Stream. The Navy believes this buffer zone to be adequate given that impacts at RIA 62, if any, are limited to the immediate vicinity of the stream itself.
- EBS RIA 53 (Former Radio Transmitter Building) - As summarized in enclosure (5), the conditions at RIA 53 are unlikely to adversely impact this subparcel because it is hydrologically cross-gradient (i.e., potentially impacted groundwater or surface water from the area of RIA 53 flows northwest and does not enter Subparcel B1-W-1 to the southwest).

Subparcel INST-1

As shown in Figure 4, Subparcel INST-1 includes approximately 9.21 acres in the northern portion of the base. The subparcel contains Buildings 31 (BOQ), 46 (Garage), and 49 (Transient VIP Housing), and the associated grounds and parking areas. The eastern edge of the subparcel is designated at the west edge of Shea Memorial Drive. The remaining boundary of the subparcel matches the zoning for institutional reuse.

Environmental sites located within Subparcel INST-1 include MCP RTN 3-10239 and 3-10469 (BOQ Fuel Oil Releases) and RIA 45 (BOQ Fuel Oil Release to a Floor Drain). As summarized in Table 1, enclosure (4), and enclosure (5), work has been completed at these sites; therefore, they do not affect the transfer of Subparcel INST-1.

The following site is located within 200 ft of this subparcel:

- MCP RTN 3-13673 (Shea Memorial Drive spill) - As summarized in enclosure (4), the Navy has closed this RTN with a RAO. Therefore, former RTN 3-13673 does not affect the transfer of Subparcel INST-1.

Subparcel OS-A-1

As shown in Figure 5, Subparcel OS-A-1 includes approximately 30.66 acres along the southwest fenceline of the base. The subparcel has been zoned for reuse as open space. Currently, the subparcel consists of forested open space, wetlands, and Building 146 (New Air Traffic Control Tower). The eastern boundary of the southern portion of OS-A-1 has a 20 ft setback from the edge of French Stream. The eastern boundary of the northern portion of Subparcel OS-A-1 abuts the adjacent SPUD zoning area. The western boundary of the subparcel extends to the Navy's property line, which may or may not be equivalent to the current base fenceline (i.e., it is likely that the current fenceline is set back a few feet from the actual property line). The northern boundary of the subparcel runs along the Weymouth-Abington town line and abuts the adjacent SPUD zoning area.

No current or former IR Program sites, MCP sites, or EBS RIAs are located within Subparcel OS-A-1.

The following sites are located within 200 ft of this subparcel:

- IR Site 5 (Tile Leach Field) - OS-A-1 is set back 75 ft from Site 5 and across French Stream. As summarized in enclosure (3), the Navy's investigations are ongoing at IR Site 5. However, no impacts to subparcel OS-A-1 are anticipated from IR Site 5 because chemicals of concern (COCs) from that site are unlikely to be transported across French Stream.
- MCP RTN 4-13224 (old tower) - OS-A-1 is set back over 140 ft from RTN 4-13224. As summarized in enclosure (4), the Navy

has filed a RAO and closed MCP RTN 4-13224; therefore, it does not affect the transfer of subparcel OS-A-1.

- EBS RIA 4A (Air Traffic Control [ATC] abandoned septic system)- OS-A-1 is set back 100 ft from RIA 4A. The Navy believes this buffer zone to be adequate to support the ongoing investigation and to be protective of users of subparcel OS-A-1 because the concerns at RIA 4A are limited to manganese concentrations in groundwater above benchmarks (likely due to background conditions) and low arsenic concentrations in soil (not likely to migrate to subparcel OS-A-1). The Navy's ongoing investigation of RIA 4A is addressing the wetlands west of the septic mound and groundwater directly under the mound. While there may be some mounding and local flow to the wetland at this location, flow appears to be predominantly to the southeast. This portion of OS-A-1 is predominantly wetland. Based on the locations and levels of analytes detected, the extended buffer zone is sufficient to address concerns about the potential impacts to OS-A-1.
- RIA 4B (ATC waste disposal) - OS-A-1 is set back 100 ft from RIA 4B. The Navy believes this buffer zone from subparcel OS-A-1 to be adequate given that, as summarized in enclosure (5), the COC exceedences at RIA 4B were associated with ecological benchmarks from sediment and surface water samples.
- RIA 62 (French Stream) - This subparcel is set back 20 ft from French Stream. The Navy believes this buffer zone to be adequate given that impacts at RIA 62, if any, are limited to the immediate vicinity of the stream itself.

Subparcel OS-C-1

As shown in Figure 6, Subparcel OS-C-1 includes approximately 132.53 acres in the northern portion of the base. The subparcel is zoned for reuse as open space. Currently, the subparcel contains a large amount of open space and wetlands in addition to most of the North Ballfield area and Buildings 24, 25, 52, 92, 93, 94, 98, 133, and 141. Much of the northern and eastern boundary of the subparcel is designated at the edge of Shea Memorial Drive. The subparcel does not include French Stream (20 ft setback on both banks of the stream).

No IR Program sites are located in this subparcel. The following MCP and EBS sites are located within Subparcel OS-C-1: MCP RTN 3-15379 (Building 24 Site), EBS RIA 43 (fill pipe at

Building 24), EBS RIA 44 (soot in Building 98), EBS RIA 51 (underground asbestos-lined pipes), EBS RIA 52 (metal cans north of North Ballfield), and EBS RIA 98 (PCB release from former transformer). As summarized in Table 1, enclosure (4), and enclosure (5), the required actions have been, or will soon be, completed at these sites; therefore, they will not adversely affect the transfer of Subparcel OS-C-1 at the time of transfer.

The following sites are located within 200 ft of this subparcel:

- IR Program Site 7 (Sewage Treatment Plant) - As summarized in enclosure (3), the Navy believes that the presence of this nearby site does not adversely affect the transfer of Subparcel OS-C-1 given that the majority of the subparcel is upgradient of Site 7 (i.e., groundwater from Site 7 will not enter the subparcel). A portion of OS-C-1 that is downgradient (southwest) of Site 7 is located over 200 ft away. Groundwater risks at Site 7 pertain to arsenic under the hypothetical future resident and recreational reuse scenarios. However, the area is zoned for open space reuse, not residential reuse. Also, recreational reuse of groundwater in this area is unlikely because this area is not within a potentially productive aquifer zone nor is it currently targeted by SSTTDC for water supply development. In addition, five of the six monitoring wells on the downgradient side of Site 7 did not have detected levels of arsenic in groundwater. In the sixth well, arsenic (5.7 ug/L) only slightly exceeded the Safe Drinking Water Act Maximum Contaminant Level (MCL) of 5 ug/L. Therefore, the 200 ft buffer zone is believed to be protective of future users of subparcel OS-C-1.
- MCP RTN 3-10239 (BOQ fuel oil releases) - As summarized in enclosure (4), the Navy has filed a RAO and closed this RTN.
- MCP RTN 3-13673 (Shea Memorial Drive spill) - As summarized in enclosure (4), the Navy has filed a RAO and closed this RTN.
- MCP RTN 3-10858 (Fuel Farm) - There are no impacts to subparcel OS-C-1 because, as summarized in enclosure (4), the Navy completed the required work and filed a final RAO in Feb 02 to close this site.
- EBS RIA 2B (runway/taxiway north of 17-35) - No impacts to Subparcel OS-C-1 from RIA 2B are anticipated because OS-C-1 is located upgradient and because NFA is anticipated for RIA 2B.
- EBS RIA 25 (Fuel Farm) - As summarized in enclosure (5), NFA is required for this RIA. See also MCP RTN 3-10858 above.

- EBS RIA 45 (BOQ oil in floor drain) - As summarized in enclosure (5), no impacts to this subparcel are identified because NFA is required for this RIA.
- EBS RIA 53 (former radio transmitter) - No impacts to Subparcel OS-C-1 from RIA 53 are anticipated because OS-C-1 is located upgradient. The Navy believes that the 100 ft buffer around the east and south sides of RIA 53 are adequate to support the ongoing investigation of RIA 53. No impacts from RIA 53 have been identified in OS-C-1.
- EBS RIA 55B (debris area north of Trotter Road) - As summarized in enclosure (5), no impacts from RIA 55 are anticipated for this subparcel given that RIA 55B pertains to potential soil impacts from surficial debris. The majority of Subparcel OS-C-1 is located over 200 ft away from RIA 55B.
- EBS RIA 55C (debris area north of Trotter Road) - As summarized in enclosure (5), no impacts from RIA 55C are anticipated for this subparcel given that RIA 55C pertains to surficial debris that is located 70 ft away from this subparcel.
- EBS RIA 62 (French Stream) - This subparcel is set back 20 ft from French Stream. The Navy believes this buffer zone to be adequate given that impacts at RIA 62, if any, are limited to the immediate vicinity of the stream itself.
- EBS RIA 97 (fire department spill response records) - As summarized in enclosure (5), NFA is required for this RIA.

Subparcel OS-C-2 - Tennis Courts

As shown in Figure 7, Subparcel OS-C-2 includes approximately 1.51 acres in the north/central portion of the base. The subparcel is zoned for reuse as open space. The subparcel only contains tennis courts associated with the recreational complex and the wooded area behind the tennis courts. A portion of Building 121 (recreational complex) is located in this subparcel (building is described under Subparcel SPUD-1). The western boundary is defined by the east edge of Houghton Road. The northern and eastern boundaries of this subparcel abut the adjacent SPUD zoning parcel.

No IR Program sites, MCP RTNs, or EBS RIAs are located in this subparcel.

The following sites are located within 200 ft of this subparcel:

- MCP RTN 3-10858 (Fuel Farm) - There are no impacts for Subparcel OS-C-2 because, as summarized in enclosure (4),

completed the required work and filed a final RAO in Feb 02 to close this site.

- RTN 3-13673 (Shea Memorial Drive spill) - No identified impacts for Subparcel OS-C-2 because, as summarized in enclosure (4), the Navy has filed a RAO and closed this RTN.
- RTN 3-16598E (jet fuel pipeline) - No identified impacts for Subparcel OS-C-2 because, as summarized in enclosure (4), the Navy has filed a RAO and closed the pipeline portion of this RTN.
- EBS RIA 24 (ordnance shop) - No identified impacts for Subparcel OS-C-2 because, as summarized in enclosure (5), NFA is required for this RIA.
- EBS RIA 25 (Fuel Farm) - As summarized in enclosure (5), NFA is required for this RIA. See also MCP RTN 3-10858 above.
- EBS RIA 26 (jet fuel separator house) - As summarized in enclosure (5), NFA is required for this RIA. See also MCP RTN 3-10858 above.
- EBS RIA 30B (spills off of Hangar 2 apron) - See enclosure (5). Although investigations are is ongoing at RIA 30B, potential impacts to the subparcel are unlikely because OS-C-2 is located upgradient of this area.
- EBS RIA 42 (buried asbestos pipes) - No identified impacts for Subparcel OS-C-2 because, as summarized in enclosure (5), NFA is required for RIA 42.
- EBS RIA 46 (alleged buried asbestos tiles) - No identified impacts for Subparcel OS-C-2 because, as summarized in enclosure (5), NFA is required for RIA 46.

Subparcel OS-R-1

As shown in Figure 8, Subparcel OS-R-1 includes approximately 5.53 acres located along the northern fenceline of the eastern extension of the base. The subparcel is zoned for reuse as open space. Currently, the subparcel is comprised of forested open space and wetlands. No buildings are located within this subparcel. The eastern boundary of the subparcel is set at the wetland edge for Old Swamp River. The north boundary of the subparcel extends to the Navy's property line, which may or may not be equivalent to the current base fenceline (i.e., it is likely that the current fenceline is set back a few feet from the actual property line).

No IR Program, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel:

- EBS RIA 2A (east of runway 8-26) - As summarized in enclosure (5), the Navy has completed a final NFA Decision Document; therefore, this former RIA does not affect the transfer of subparcel OS-R-1.
- RIA 104 (Old Swamp River) - As summarized in enclosure (5), no impacts to subparcel OS-R-1 are anticipated from this RIA because potential impacts associated with RIA 104, if any, are limited to the immediate area of the river.

Subparcel OS-R-2

As shown in Figure 9, Subparcel OS-R-2 includes approximately 7.49 acres along the north fenceline of the eastern extension of the base. The subparcel is zoned for reuse as open space. Currently, the subparcel consists of forested open space and wetlands. No buildings are located within this subparcel. The western boundary of the subparcel is set at the wetland edge for Old Swamp River. The northern boundary of the subparcel extends to the Navy's property line, which may or may not be equivalent to the current base fenceline (i.e., it is likely that the current fenceline is set back a few feet from the actual property line).

No IR Program, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel:

- IR Program Site 3 (Small Landfill) - No potential impacts to Subparcel OS-R-2 have been identified because, as summarized in enclosure (3), the Navy completed a final Record of Decision for "No Action with Groundwater Monitoring" for the Small Landfill under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). As stated in the Navy's ROD, and signed by EPA Region I, no cleanup action is necessary at the Small Landfill under CERCLA to ensure protection of human health and the environment. The Navy may still need to close Site 3 under the Massachusetts landfill program; however, the Navy anticipates that the buffer zone around the Small Landfill is sufficient for such activities.

Subparcel OS-R-3

As shown in Figure 10, Subparcel OS-R-3 includes approximately 26.90 acres along the eastern fenceline of the base. The subparcel is zoned for reuse as open space. Currently, the subparcel consists of forested open space and wetlands. No buildings are located within this subparcel. Subparcel OS-R-3 does not include a stream (20 ft setback on both sides of the stream) that exits a culvert located west of Union Street (stream flows east to Old Swamp River). The eastern boundary of the subparcel extends to the Navy's property line, which may or may not be equivalent to the current base fenceline (i.e., it is likely that the current fenceline is set back a few feet from the actual property line). The northernmost boundary of the subparcel abuts the adjacent SPUD zoning area.

No IR Program, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel [site summaries are presented in enclosure (5)]:

- EBS RIA 2C (suspected overuse of herbicides for runway lighting) - No impacts are identified for Subparcel OS-R-3 because NFA is likely to be required for this RIA.
- EBS RIA 8 (remnants of building foundation) - No potential impacts from RIA 8 are anticipated due to the distance from subparcel OS-R-3 (over 100 ft away).
- EBS RIA 9A (final disposition of former Building 61) - No potential impacts have been identified from RIA 9A due to the distance from subparcel OS-R-3 (over 180 ft away) and because NFA is likely to be required for this RIA based on recent data.
- EBS RIA 9B (final disposition of former Building 62) - No potential impacts have been identified from RIA 9B due to the distance from subparcel OS-R-3 (over 140 ft away).
- EBS RIA 109 (detection at background location BG-07) - No impacts are anticipated for Subparcel OS-R-3 because groundwater at RIA 109 flows away from this subparcel.

Subparcel OS-R-4

As shown in Figure 9, Subparcel OS-R-4 includes approximately 5.63 acres along the fenceline at the end of the eastern extension of the base. The subparcel is zoned for reuse as open space. Currently, the subparcel consists of forested open space

and wetlands. No buildings are located within this subparcel. The western boundary of the subparcel is set at the wetland edge for Old Swamp River. The eastern and southern boundaries of the subparcel extend to the Navy's property line, which may or may not be equivalent to the current base fenceline (i.e., it is likely that the current fenceline is set back a few feet from the actual property line).

No IR Program, MCP RTNs, or EBS RIAs are located within, or within 200 ft of, this subparcel.

Subparcel OS-R-5

As shown in Figure 11, Subparcel OS-R-5 includes approximately 80.36 acres in the southern portion of the base. The subparcel is zoned for reuse as open space. Currently, the subparcel consists of forested open space, wetlands, and the Twin Ponds. No buildings are located within this subparcel. The subparcel does not include French Stream (20 ft setback on both banks of the stream). The eastern and southern boundaries of the subparcel extend to the Navy's property line, which may or may not be equivalent to the current base fenceline (i.e., it is likely that the current fenceline is set back a few feet from the actual property line).

No IR Program or MCP RTNs are located within this subparcel. EBS RIAs 7A and 7B (both associated with debris along the fenceline) are located within this subparcel. As described in enclosure (5), the Navy has completed a final NFA Decision Document for RIA 7B and a draft NFA Decision Document for RIA 7A. EPA and MADEP have agreed with the NFA proposal and the Navy is working to complete a final NFA Decision Document for RIA 7A prior to the transfer of the property.

The following sites are located within 200 ft of this subparcel:

- EBS RIA 6 (East Street gate area) - No impacts to Subparcel OS-R-5 because, as summarized in enclosure (5), NFA is required for this RIA.
- EBS RIA 62 (French Stream) - No potential impacts to this subparcel have been identified because, as summarized in enclosure (5); impacts associated with RIA 62, if any, are limited to the immediate area of the stream.
- EBS RIA 102 (East Street gate area transformer) - No impacts to Subparcel OS-R-5 because, as summarized in enclosure (5), NFA is required for this RIA.

- EBS RIA 105 (former pads near Taxiway C) - No impacts to Subparcel OS-R-5 because, as summarized in enclosure (5), it is likely that NFA is required for this RIA.

Subparcel OS-W-1

As shown in Figure 12, Subparcel OS-W-1 includes approximately 23.01 acres along the northern fenceline of the base. The subparcel is zoned for reuse as open space. Currently, the subparcel consists of forested open space, wetlands, as well as Buildings 32, 85, and 133A. The subparcel includes a portion of Shea Memorial Drive. The northern boundary of the subparcel extends to the Navy's property line, which may or may not be equivalent to the current base fenceline (i.e., it is likely that the current fenceline is set back a few feet from the actual property line). The eastern boundary of the subparcel abuts the property that was already transferred to the U.S. Coast Guard as a housing area (see the U.S. Coast Guard Civil Engineering Unit Boundary Plan, District #1, South Weymouth, Massachusetts, Family Housing Civil Boundary Survey, PSN 32-P7084, Drawing Number P000824).

No IR Program sites, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel:

- EBS RIA 51 (buried asbestos-lined pipe) - As summarized in enclosure (5), there are no impacts to Subparcel OS-W-1 because NFA is required for this RIA.
- EBS RIA 53 (former radio transmitter) - As summarized in enclosure (5), there are no identified impacts to Subparcel OS-W-1 from RIA 53. Groundwater at RIA 53 flows northwest, which is away from the majority of Subparcel OS-W-1. A small stream separates RIA 53 and Subparcel OS-W-1. The portion of Subparcel OS-W-1 that is northwest of RIA 53 only contains Shea Memorial Drive. The 180 ft buffer zone between RIA 53 and the west end of Subparcel OS-W-1 is believed to be adequate to support the Navy's ongoing investigation of RIA 53 and to pose no hazards to users of Shea Memorial Drive.
- EBS RIA 98 ("Mass 6 Site") - As summarized in enclosure (5), there are no impacts to Subparcel OS-W-1 because NFA is required for this RIA.

Subparcel OS-W-2

As shown in Figure 13, Subparcel OS-W-2 includes approximately 21.43 acres of forested open space and wetlands located in the northeast portion of the base. No buildings are located within this subparcel. The subparcel is zoned for reuse as open space. The eastern boundary of the subparcel extends to the Navy's property line, which may or may not be equivalent to the current base fenceline (i.e., it is likely that the current fenceline is set back a few feet from the actual property line). The northern boundary of the subparcel matches the southern extent of the property already transferred to the U.S. Coast Guard as a housing area (see the U.S. Coast Guard Civil Engineering Unit Boundary Plan, District #1, South Weymouth, Massachusetts, Family Housing Civil Boundary Survey, PSN 32-P7084, Drawing Number P000824).

No IR Program sites, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel:

- MCP RTN 3-15289 (swimming pool) - As summarized in enclosure (4), there are no impacts to this subparcel because the Navy has filed a RAO and closed this RTN.
- EBS RIA 35 (pistol range) - As summarized in enclosure (5), there are no impacts to this subparcel because RIA 35 has been addressed through a removal action and will be closed under CERCLA.
- EBS RIA 39A (East Mat non-stained pavement) - As summarized in enclosure (5), there are no identified impacts for this subparcel because potential impacts are limited to the East Mat area and the available data indicate that NFA is likely to be required for this RIA.
- EBS RIA 39B (East Mat construction debris area) - As summarized in enclosure (5), no impacts to this subparcel are identified because potential impacts at RIA 39B pertain to soil beneath the East Mat pavement (unlikely to migrate north to Subparcel OS-W-2).
- EBS RIA 39C (East Mat groundwater) - As summarized in enclosure (5), no impacts to this subparcel are identified because it is upgradient of this RIA.
- EBS RIA 39H (East Mat material in catch basins) - As summarized in enclosure (5), no impacts to this subparcel are identified because no RCRA-hazardous substances were identified at this RIA and NFA is likely to be required.

- EBS RIA 49 (swimming pool) - As summarized in enclosure (5), there are no impacts to this subparcel because NFA is required for this RIA.
- EBS RIA 50 (child care center) - As summarized in enclosure (5), there are no impacts to this subparcel because NFA is anticipated for this RIA.
- EBS RIA 60 (East Mat drainage ditch) - As summarized in enclosure (5), there are no identified hazards for this subparcel because this RIA is located more than 100 ft away and its potential impacts are unlikely to extend beyond the drainage ditch itself.
- EBS RIA 92 (hobby shop) - As summarized in enclosure (5), no impacts to this subparcel are identified because removal actions have already been completed at this RIA. Final resolution with regulatory requirements is pending preparation of a Decision Document.
- EBS RIA 108 (detection at background location BG-05) - As summarized in enclosure (5), this is a new RIA for which investigations are pending. However, no impacts to this subparcel have been identified and the Navy believes that the buffer zone is adequate to support the RIA work (BG-05 itself is located over 120 ft from Subparcel OS-W-2).

Subparcel SPUD-1 - Recreation Center, Pavilion, and South Ballfield

As shown in Figure 7, Subparcel SPUD-1 includes approximately 10.24 acres in the north/central portion of the base. The reuse zoning of the subparcel is "Special Planned Use District (SPUD)." Currently, much of the subparcel is associated with the Recreational Complex that is leased to SSTDC (Pavilion area, South Ballfield, most of Building 121, the associated parking area, a portion of the North Ballfield, and a portion of the property on the east side of the tennis courts). The subparcel also contains Buildings 97 (Chapel), 113 (Field House Head), and 122 (Conference Center/former Bowling Alley). The eastern boundary of the subparcel is designated at the western edge of Shea Memorial Drive. The northern boundary of the subparcel is defined by the extent of the SPUD zoning.

No IR Program sites are located within this subparcel. EBS RIA 48 (Navy Exchange [NEX] Filling Station UST Leak Detection Failure) and RIA 91 (Unreported Incidental Spills/Drips from the Former NEX Filling Station) are located within this subparcel and were handled under the MCP program as RTN 3-13316 ("NEX

Site"). As summarized in enclosures (4) and (5), the Navy has completed restoration work at this area and filed a RAO for RTN 3-13316. NFA is required for RIA 48, RIA 91, and RTN 3-13316. This property is therefore suitable for transfer.

The following sites are located within 200 ft of this subparcel:

- IR Program Site 7 (Sewage Treatment Plant)
- MCP RTN 3-10858 (Fuel Farm) - There are no impacts to this subparcel because, as summarized in enclosure (4), the Navy has completed the required work and filed a final RAO in Feb 02 to close this site.
- MCP RTN 3-13673 (Shea Memorial Drive spill) - As summarized in enclosure (4), no impacts to this subparcel are identified because the Navy has filed a RAO and closed this RTN.
- MCP RTN 3-15289 (swimming pool) - As summarized in enclosure (4), no impacts to this subparcel are identified because the Navy has filed a RAO and closed this RTN.
- MCP RTN 3-15379 (Dispensary) - As summarized in enclosure (4), no impacts to this subparcel are identified because the Navy has filed a RAO and closed this RTN.
- MCP RTN 3-16598E (jet fuel pipeline) - As summarized in enclosure (4), no impacts to this subparcel are identified because the Navy has filed a RAO and closed the RTN for the pipeline.
- EBS RIA 25 (Fuel Farm) - As summarized in enclosure (5), NFA is required for this RIA. See also MCP RTN 3-10858 above.
- EBS RIA 26 (jet fuel separator house) - As summarized in enclosure (5), NFA is required for this RIA. See also MCP RTN 3-10858 above.
- EBS RIA 42 (buried asbestos-lined pipes) - As summarized in enclosure (5), no impacts to this subparcel are identified because NFA is required for this RIA.
- EBS RIA 43 (Building 24 fill pipe) - As summarized in enclosure (5), no impacts to this subparcel are identified because NFA is required for this RIA.
- EBS RIA 44 (Building 98 soot) - As summarized in enclosure (5), no impacts to this subparcel are identified because NFA is required for this RIA.
- EBS RIA 46 (suspected buried asbestos shingles) - As summarized in enclosure (5), no impacts to this subparcel are identified because NFA is required for this RIA.
- EBS RIA 47 (hydraulic lifts in Building 102) - As summarized in enclosure (5), no impacts to Subparcel SPUD-1 are identified because NFA is likely to be required for this RIA.

- EBS RIA 49 (swimming pool) - As summarized in enclosure (5), there are no impacts to this subparcel because NFA is required for this RIA.
- EBS RIA 50 (child care center) - As summarized in enclosure (5), there are no impacts to this subparcel because NFA is anticipated for this RIA.
- EBS RIA 78C (undocumented removal of UST No. 24) - As summarized in enclosure (5), no impacts to Subparcel SPUD-1 are identified because NFA is likely to be required for RIA 78C.

Subparcel SPUD-2 - Open Field

As shown in Figure 7, Subparcel SPUD-2 includes approximately 1.51 acres in the north/central portion of the base. The reuse zoning of the subparcel is "Special Planned Use District." Currently, the subparcel is comprised of an open field associated with the Recreational Complex that is leased to SSTTDC. There are no buildings within this subparcel.

No IR Program sites or MCP RTNs are located within this subparcel. EBS RIA 42 (subsurface asbestos-lined pipes) is located within SPUD-2. As summarized in enclosure (5), the Navy has completed a final NFA Decision Document for RIA 42 (regulatory concurrence anticipated for May 02). Clause 8(g) of enclosure (2) includes a restriction on excavations in this area.

The following sites are located within 200 ft of this subparcel:

- MCP RTN 3-13673 (Shea Memorial Drive spill) - As summarized in enclosure (4), no impacts to this subparcel are identified because the Navy has filed a RAO and closed this RTN.
- MCP RTN 3-15829 (Building 115 barracks) - As summarized in enclosure (4), no impacts to Subparcel SPUD-2 are identified because the Navy has filed a RAO and closed this RTN.
- EBS RIA 46 (suspected buried asbestos shingles) - As summarized in enclosure (5), no impacts to Subparcel SPUD-2 are identified because NFA is required for this RIA.
- EBS RIA 90 (pipes protruding from ground) - As summarized in enclosure (5), no impacts to Subparcel SPUD-2 are identified because NFA is required for this RIA.

Subparcel SPUD-3

As shown in Figure 8, Subparcel SPUD-3 includes approximately 16.79 acres in the central portion of the eastern extension of the base. The reuse zoning of the subparcel is "Special Planned Use District." Currently, the subparcel is comprised of open space (fields, forest, and wetlands). The southeastern corner of the subparcel is set at the wetland edge for Old Swamp River. No buildings are located within the subparcel.

No IR Program sites, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel:

- IR Program Site 2 (Rubble Disposal Area) - As summarized in enclosure (3), no impacts to Subparcel SPUD-3 are identified because the concerns at Site 2 are primarily regarding buried construction debris. Low concentrations of inorganic constituents in groundwater are not anticipated to impact the subparcel.
- EBS RIA 2A (east of Runway 8-26) - As summarized in enclosure (5), the Navy has completed a final NFA Decision Document; therefore, this former RIA does not affect the transfer of Subparcel SPUD-3.
- EBS RIA 85 (alleged second fire fighting training area) - As summarized in enclosure (5), no impacts to Subparcel SPUD-3 are identified because NFA is required for this RIA.
- EBS RIA 95A (Building 101 PCBs) - As summarized in enclosure (5), no impacts to Subparcel SPUD-3 are identified because sample results at this RIA did not exceed benchmark criteria.
- EBS RIA 104 (Old Swamp River) - No potential impacts to Subparcel SPUD-3 have been identified because, as summarized in enclosure (5), impacts associated with RIA 104, if any, are likely to be limited to the immediate area of the river.

Subparcel SPUD-4

As shown in Figure 9, Subparcel SPUD-4 includes approximately 34.34 acres located at the end of the eastern extension of the base. The reuse zoning of the subparcel is "Special Planned Use District." Currently, the subparcel is comprised of forested open space and wetlands. The central western boundary of the subparcel is set at the wetland edge for Old Swamp River. No buildings are located within the subparcel.

No IR Program sites, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel:

- IR Program Site 3 (Small Landfill) - No potential impacts to Subparcel SPUD-4 have been identified because, as summarized in enclosure (3), the Navy has completed a final Record of Decision for "No Action with Groundwater Monitoring" for the Small Landfill under CERCLA. As stated in the Navy's ROD, and signed by EPA Region I, no cleanup action is necessary at the Small Landfill under CERCLA to ensure protection of human health and the environment. The Navy may still need to close Site 3 under the Massachusetts landfill program; however, the Navy anticipates that the buffer zone around the Small Landfill is sufficient for such activities. Subparcel SPUD-4 is located hydrologically upgradient of Site 3.
- EBS RIA 104 (Old Swamp River) - No potential impacts to Subparcel SPUD-4 have been identified because, as summarized in enclosure (5), impacts associated with RIA 104, if any, are limited to the immediate area of the river.

Subparcel SPUD-5

As shown in Figure 5, Subparcel SPUD-5 includes approximately 7.44 acres at the west end of Runway 8-26. The reuse zoning of the subparcel is "Special Planned Use District." The subparcel is comprised mostly of open space and some forested space. No buildings are located within the subparcel. The northern boundary of the subparcel runs along the Weymouth/Abington townline (a portion to the east extends further north along the SPUD/OS-W zoning line). The western and southern boundaries abut the adjacent OS-A zoning area.

No IR Program sites, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel:

- EBS RIA 2C (suspected overuse of herbicides for runway lighting) - As summarized in enclosure (5), no impacts to Subparcel SPUD-5 have been identified because NFA is likely to be required for this RIA.
- EBS RIA 2E (runway/taxiway) - As summarized in enclosure (5), no impacts to Subparcel SPUD-5 have been identified because the RIA is located over 90 ft away and recent sampling information suggest that NFA is likely to be required.

Subparcel SPUD-6

As shown in Figure 11, Subparcel SPUD-6 includes approximately 51.38 acres in the southern portion of the runway triangle. The reuse zoning of the subparcel is "Special Planned Use District." Currently, the subparcel is comprised of open space and portions of Runway 17-35 and Taxiway C. The eastern boundary of SPUD-6 follows along a dirt road. No buildings are located within the subparcel.

No IR Program sites, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel [site summaries are presented in enclosure (5)]:

- EBS RIA 1A (runway/taxiway optical lighting system) - No impacts to Subparcel SPUD-6 are identified because NFA is anticipated for this RIA.
- EBS RIA 2C (suspected overuse of herbicides for runway lighting) - No impacts to Subparcel SPUD-6 are identified because NFA is likely to be required for this RIA.
- EBS RIA 2D (sparse vegetation south of Runway 17-35) - No impacts to Subparcel SPUD-6 are identified because potential impacts would be limited to the grass-covered area outside of the runway triangle and because recent sampling data indicate that NFA is likely to be required.
- EBS RIA 62 (French Stream) - No impacts to Subparcel SPUD-6 are identified because impacts associated with RIA 62, if any, are limited to the immediate area of the stream.
- EBS RIA 101 (East Street gate area, possible disposal of runway lighting) - No impacts to Subparcel SPUD-6 are identified because this RIA is located over 100 ft away from this subparcel.

- EBS RIA 102 (East Street gate area, PCB transformer) - No impacts to Subparcel SPUD-6 are identified because NFA is required for this RIA.
- EBS RIA 105 (former pads near taxiway) - No impacts to Subparcel SPUD-6 are identified because NFA is likely to be required for this RIA.

Subparcel SPUD-7

As shown in Figure 11, Subparcel SPUD-7 includes approximately 3.73 acres located east of Taxiway C in the southern portion of the base. The reuse zoning of the subparcel is "Special Planned Use District." The subparcel is comprised of wooded open space. The western boundary of SPUD-7 is located 20 ft from the edge of the tributary to French Stream. No buildings are located within the subparcel.

No IR Program sites, MCP RTNs, or EBS RIAs are located within this subparcel.

The following sites are located within 200 ft of this subparcel:

- EBS RIA 62 (French Stream) - As summarized in enclosure (5), no impacts to Subparcel SPUD-7 are identified because impacts associated with RIA 62, if any, are limited to the immediate area of the stream.

Subparcel SR-R

As shown in Figure 10, Subparcel SR-R includes approximately 6.87 acres in the southeast portion of the base. The reuse zoning of the subparcel is "Senior Residential." Currently, the subparcel is comprised of open space and wetlands. No buildings are located within the subparcel. The eastern and southern boundaries of the subparcel extend to the Navy's property line, which may or may not be equivalent to the current base fenceline (i.e., it is likely that the current fenceline is set back a few feet from the actual property line). The northern and western boundaries of the subparcel abut the adjacent OS-R zoning parcel.

No IR Program sites, MCP RTNs, or EBS RIAs are located in, or within 200 ft of, this subparcel.

Subparcel SR-W-1 - Open Field

As shown in Figure 7, Subparcel SR-W-1 includes approximately 1.34 acres in the north/central portion of the base. The reuse zoning of the subparcel is "Senior Residential." Currently, the subparcel is comprised of an open field, a parking lot, and a basketball court. No buildings are located within the subparcel.

No current or former IR Program sites or MCP RTNs are located within this subparcel. Only the following EBS RIA is located within this subparcel:

- EBS RIA 46 (alleged buried asbestos tiles) - As summarized in enclosure (5), only a small portion of this RIA is located in Subparcel SR-W-1. The Navy has issued a final NFA Decision Document (regulatory concurrence anticipated for May 02) for this RIA because no hazards were associated with the small amount of debris present (no large subsurface disposals of ACM were found). Therefore, this property is suitable to transfer.

The following sites are located within 200 ft of this subparcel:

- MCP RTN 3-13673 (Shea Memorial Drive spill) - As summarized in enclosure (4), no impacts to Subparcel SR-W-1 have been identified because the Navy has filed a RAO and closed this RTN.
- MCP RTN 3-15289 (swimming pool) - As summarized in enclosure (4), no impacts to Subparcel SR-W-1 have been identified because the Navy has filed a RAO and closed this RTN.
- EBS RIA 42(buried asbestos pipes) - As summarized in enclosure (5), no impacts to Subparcel SR-W-1 have been identified because NFA is required for this RIA.
- EBS RIA 49 (swimming pool) - As summarized in enclosure (5), no impacts to Subparcel SR-W-1 have been identified because NFA is required for this RIA.
- EBS RIA 90 (pipes protruding from ground) - As summarized in enclosure (5), no impacts to Subparcel SR-W-1 have been identified because NFA is required for this RIA.

Subparcel SSE - Spruce Street Extension

As shown in Figure 11, Subparcel SSE includes approximately 1.85 acres at the southernmost portion of the base. This subparcel is not part of the Towns' Reuse Plan and therefore has

not been zoned for reuse. This subparcel is separated from the remainder of the main base by Spruce Street, a public access road in Rockland/Abington. Currently, the subparcel is comprised of open space and forest. There are no buildings currently on this subparcel. The subparcel does not include French Stream (20 ft setback from both sides of the stream).

No IR Program sites, MCP sites, or EBS RIAs are located in subparcel SSE.

The only site within 200 ft of this subparcel is RIA 62 (French Stream). As summarized in enclosure (5), no impacts to this subparcel from RIA 62 have been identified because impacts associated with RIA 62, if any, are likely to be limited to the immediate area of the stream.

The following sections discuss current status of various environmental/compliance issues within the subject subparcels of this EBST, as indicated in Table 1:

Massachusetts Contingency Plan (MCP) Sites

As previously stated, the following former MCP sites are located within the subject subparcels:

- RTN 3-10239/3-10469 (BOQ Fuel Oil) in Subparcel INST-1
- RTN 3-13316 (NEX Filling Station) in Subparcel SPUD-1
- RTN 3-15379 (Building 24 Site) in Subparcel OS-C-1

As summarized in enclosure (4), the Navy has completed the required work and filed RAOs to close these RTNs. Therefore, the locations of these former RTNs are suitable to transfer. As previously described in this EBST and as summarized in enclosure (4), former and current MCP sites in the vicinity of the FOST subparcels do not adversely impact the transfer of the FOST subparcels.

The RAOs for the Building 24 site and the BOQ site included Activity and Use Limitations (AULs) to address residual petroleum-impacted soil beneath the buildings' foundations.

- The AUL for RTN 3-15379 applies to 204 +/- SF around Building 98 (Figure 6) for the petroleum-impacted soil beneath the building foundation. Volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbons (EPH) concentrations

were detected above the applicable MCP Method 1 standards (S-3/GW-2 and S-3/GW-3) in one sample from isolated soil (beneath the Building 98 footprint). However, calculated Exposure Point Concentrations for soil were below the applicable MCP Method 1 standards (S-1/GW-2, S-1/GW-3, S-3/GW-2, and S-3/GW-3), subject to the AUL. Groundwater sample results were below the applicable MCP Method 1 standards (GW-2 and GW-3). The AUL does not prevent future use or redevelopment of the property; however, it does impose requirements for maintaining the Building 98 foundation or for soil management if a reuse option would disturb residual petroleum-impacted soil beneath the building foundation (i.e., soil 3 to 15 ft below ground surface).

- The AUL for RTN 3-10239/3-10469 applies to 7,269 +/- SF beneath a portion of the Building 31 foundation (Figure 4). Subsequent to the UST/soil removal, confirmatory soil samples from the excavation area were reported to contain petroleum concentrations in excess of the applicable MCP Method 1 standards. Additional soil excavation was not possible because of the building's foundation. No separate-phase petroleum or petroleum-related compounds were detected in groundwater samples. Soil vapors did not exceed DEP risk guidance action levels. The AUL does not prevent future redevelopment of the property; however, it does impose requirements for soil management if a reuse option would potentially disturb residual petroleum-impacted soil beneath the building foundation.

Restrictions associated with these AULs are presented in clause 8(b) and clause 8(c) of enclosure (2).

EBS Review Item Areas

Based on the *Basewide EBS Phase I Report*, various EBS RIAs have been identified at the Main Base of NAS South Weymouth [see enclosure (3)]. As previously stated the following current and former RIAs are located within, or partially within, the subject subparcels of this EBST:

- EBS RIA 7A (debris near fenceline) in Subparcel OS-R-5
- EBS RIA 7B (debris near fenceline) in Subparcel OS-R-5
- EBS RIA 42 (underground asbestos pipes) in Subparcel SPUD-2
- EBS RIA 43 (Building 24 fill pipe) in Subparcel OS-C-1
- EBS RIA 44 (soot in Building 98) in Subparcel OS-C-1

- EBS RIA 45 (BOQ petroleum) in Subparcel INST-1
- EBS RIA 46 (suspected buried asbestos shingles at barracks) in Subparcel SR-W-1
- EBS RIA 48 (NEX UST) in Subparcel SPUD-1
- EBS RIA 51 (underground asbestos pipes) in Subparcel OS-C-1
- EBS RIA 52 (unidentified metal cans) in Subparcel OS-C-1
- EBS RIA 91 (NEX unreported spills) in Subparcel SPUD-1
- EBS RIA 98 ("Mass 6 Site") in Subparcel OS-C-1.

As summarized in enclosure (5), the Navy has completed the required work and closure documentation for these RIAs within the FOST subparcels. Therefore, the property within these RIAs is suitable to transfer pending regulatory concurrence on closure documentation. The property within the boundaries of the above RIAs will not be transferred until the Navy has completed final NFA Decision Documents for that RIA. No decision documents will be prepared for EBS RIAs that were transferred to other programs or were deemed to require NFA during the early stages of the EBS program.

The following generalized EBS RIAs also apply to portions of the subparcels within this FOST:

- EBS RIA 76 (basewide solid waste) - As summarized later in this EBST and in enclosure (5), the presence of solid waste does not prohibit a FOST. Notification of solid waste debris areas within the FOST subparcels is provided in enclosure (7). The Navy resolved solid waste issues with MADEP separately from this FOST. See Enclosure (1a) of this EBST.
- EBS RIA 77 (basewide USTs, leak tests not performed) - As summarized in enclosure (5), NFA is required for this RIA because the Navy has removed the USTs from the main base except at Building 133. As noted in Table 1 of this EBST, the UST at Building 133 has passed several of these tests.
- EBS RIA 79 (basewide asbestos) - As summarized in enclosure (5), this RIA is being handled on a case-by-case basis and NFA is required under the EBS program. The types and quantities of ACMs within the buildings of the FOST subparcels are presented in this EBST. The conditions of these ACMs are summarized in Table 1 of this EBST. As noted above, three ACM-related RIAs (42, 46, 51) within the FOST subparcels require NFA. Restrictions to mitigate the identified potential ACM-related hazards within the FOST subparcels are presented under clause (8) of enclosure (2).

- EBS RIA 80 (basewide LBP) - As summarized in enclosure (5), this RIA is being handled on a case-by-case basis and NFA is required under the EBS program. The paint conditions for the buildings within the FOST subparcels are summarized in this EBST. Restrictions to mitigate the identified potential LBP-related hazards within the FOST subparcels are presented under clause (8) of enclosure (2).

Other EBS RIAs that are in the vicinity of the FOST subparcels are described earlier in this EBST and in enclosure (5). No adverse impacts to the FOST subparcels have been identified with respect to nearby EBS RIAs.

Polychlorinated Biphenyls

As documented in the *PCB-Free Activity Report* of 4 Jan 95, NAS South Weymouth has been "PCB-free" (PCB concentrations less than 50 parts per million) for electrical and hydraulic equipment since 31 Dec 94. Prior to that, since the promulgation of the Toxic Substances Control Act (TSCA, 40 CFR 761) in 1976, NAS South Weymouth Environmental/Public Works Department personnel have conducted periodic inspections of PCB-containing equipment at the Base. To confirm that the equipment at the base is currently PCB-free, the Navy has tested transformers and capacitors and has also verified with the manufacturers that the hydraulic systems do not contain PCBs.

Circa 1994/1995, the Navy completed a program to remove/replace ballasts containing PCBs at NAS South Weymouth. The removed ballasts were sent for offsite recycling. No PCB-containing ballasts remain at NAS South Weymouth.

Buildings 24 contains a transformer room in one of its basements. However, no PCB contamination has been identified in this area and no PCB-related restrictions or EBS RIAs have been identified for Building 24. As noted above, transformers at NAS South Weymouth are currently PCB-free.

No remaining PCB contamination has been identified within the subject subparcels of this EBST. Remedial actions at RIA 98 (release from a former PCB transformer in subparcel OS-C-1) have been completed and the Navy, EPA, and MADEP have agreed that NFA is required.

Asbestos

The *PIH Survey* of Aug 01 reported the current types, quantities, and conditions of ACMs in the buildings at the main base of NAS South Weymouth. The conditions of the ACMs in the buildings included in this FOST are summarized in Table 1 of this EBST. The types and quantities of ACMS and presumed ACMs in the buildings included in this FOST are as follows:

- Building 24 (OS-C-1) - Identified ACMs are associated with the fire door on the basement stairwell, 12"x12" black floor tile and mastic in room 235 (30 SF), 9"x9" black floor tile and associated mastic on basement stairwell (24 SF), 9"x9" black and lime floor tile and mastic throughout (under carpet and linoleum) (7,358 SF), 9"x9" tan floor tile and mastic in treatment room adjacent and north of basement stairs and west wing hallway near exit (1,285 SF), 12"x12" light gray floor tile and mastic in room 229 (193 SF), and the tan linoleum and mastic in rooms 234, 303, and 304 (2,153 SF). Presumed ACMs include the gray leveling compound possibly throughout the building (unknown quantity), white leveling compound possibly throughout the building (unknown quantity), the fire safe in room 113, and the carpet mastic throughout most areas (11,903 SF).
- Building 25 (OS-C-1) - ACMs are associated with the transite panels in the storage area (175 SF), the exterior transite shingles (152 SF), and the roof tar (50 SF). Presumed ACMs include the blue square-patterned vinyl sheet in the bathroom facility (10 SF).
- Building 31 (INST-1) - ACMs are associated with the 9"x9" black floor tile and mastic in the first and second floor hallways, the second floor bar, and the room south of room 234 (5,368 SF); the 9"x9" tan floor tile with brown and white streaks and mastic in rooms 140, 143-146, 148, 150, 152-154, 223, 228, 232-238, 240-243, 245-248, 250-252, and family service (5,543 SF); the 9"x9" brown floor tile and mastic in the first floor coatroom (70 SF); the 9"x9" green floor tile and mastic in the first floor kitchen storage area (486 SF); the 9"x9" gray floor tile and mastic in rooms 109, 111, 115-118, 121-123, 125, 129, 203, 204, 206, 207, 209, 213-215, 218-220, 225, 227, the front desk, billeting officer, and card supervisor areas (4,703 SF); the red vinyl sheet and mastic in the pool room (392 SF); and the transite shingles in the kitchen exit and attic (292 SF). Presumed ACMs include the 9"x9" tan floor tile and mastic in rooms 107, 113, 114, 119,

120, 127, 201, 202, 205, 211, 216, 217, 221, 222, 229, 230, LPO, and the second floor center hall storage room (3,252 SF); the 12"x12" tan floor tile with white and brown streaks and mastic in the entrance to the first floor north lobby bathroom, the second floor bar bathrooms, and the food preparation area south of the second floor bar (300 SF); the 12"x12" beige floor tile with white speckles and mastic in the first floor bar (84 SF); the 12"x12" gray floor tiles and mastic in the first floor dining room (1,215 SF); the carpet mastic throughout the building in most areas (21,873 SF); the gray asphalt shingles of the main roof (20,750 SF); the felt of the main roof (20,750 SF); and the built-up roofing material of the first floor bar roof (1,320 SF). The *Phase I EBS* of 18 Nov 96 noted that a basement boiler was loosely wrapped in plastic and had asbestos warning labels; however, the boiler insulation is no longer present.

- Building 32 (OS-W-1) - Presumed ACMs are associated with the 2'x4' dot serpentine acoustical tile in the southeast classrooms (376 SF); 2'x4' dot gauge acoustical tile throughout the building (996 SF), 12"x12" tan floor tile and mastic throughout the building except the mechanical room (1,325 SF); 12"x12" tan floor tile with mottles and mastic in the mechanical room (53 SF); gypsum board throughout the building (2,920 SF); joint compound throughout the building (300 SF); 4" brown vinyl baseboard and mastic throughout the building except the mechanical room (364 linear feet [LF]); brown/black asphalt roof shingles (1,755 SF); and the roof felt (1,755 SF).
- Building 46 (INST-1) - Presumed ACMs include the transite panel in the south end bay (24 SF) and the roof felt (3,300 SF).
- Building 49 (INST-1) - ACMs include 560 cubic feet (CF) of asbestos-containing soil in the crawlspace (see Table 1). The remaining presumed ACMs include the tan pebble vinyl sheet in the bathroom facility (90 SF), the white square pattern vinyl sheet in the kitchen (416 SF), and the blue and brown ornate pattern vinyl sheet in the kitchen (416 SF).
- Building 52 (OS-C-1) has presumed ACM in the roof vent tar (4 SF).
- Building 85 (OS-W-1) was reported to have ACM associated with the caulking of the south center window.
- Buildings 92, 93, and 94 (OS-C-1) have ACM associated with the roofing tar (1,531 SF for each building).
- Building 97 (SPUD-1) - ACMs include pipe fittings in the crawlspace (see Table 1) and the 9"x9" gray floor tile and

mastic in the balcony, sanctuary, and offices (4,300 SF). Presumed ACMs include the 12"x12" brown floor tile and mastic in the bathroom facility (21 SF), the carpet mastic throughout the building in most areas (13,952 SF), and the roof felt (5,000 SF).

- Building 98 (OS-C-1) - ACMs include the window caulking on the east and west side windows, the built-up roofing (224 SF), and the flue insulation for the exhaust stack of the boiler house (4 LF).
- Building 113 (OS-C-1) was presumed to have ACM associated with the roofing material (144 SF).
- Building 121 (SPUD-1) was reported to contain ACMs associated with the flashing compound along the roof perimeter (2,500 SF). Presumed ACMs include the rubber floor mastic in the exercise room (253 SF) and the carpet mastic in the game room, control, and offices (1,400 SF).
- Building 122 (SPUD-1) was reported to contain ACMs associated with the stone colored linoleum of the bathroom facilities and "dry storage" room (713 SF); the tar of the roof perimeter (100 SF); and the roof felt (6,100 SF). Presumed ACMs include the 2'x4' acoustical tile with rough texture in the pin setting room (740 SF); carpet mastic in the concourse (4,320 SF); 12"x12" light beige floor tile with tan streaks and mastic in the concourse and near the vestibule (177 SF); 4" brown vinyl baseboard and mastic in the meeting area and kitchen (326 LF); and 3" gray vinyl baseboard and mastic in the "dry storage" area (55 LF).
- Building 133 (OS-C-1) is presumed to have ACM associated with carpet mastic in the offices (744 SF); the 4" black baseboard and mastic in the interrogation room (31 LF); the mirror mastic in the old section center head (3 SF); the plaster on the ceiling of cells 1 and 2 (98 SF); the 12"x12" vinyl floor tiles in the guards area; and some of the materials in the fire proof safes.
- Building 133A (OS-W-1) is presumed to have ACM associated with roofing felt (384 SF).
- Building 141 - No ACMs present.
- Building 145 - No ACMs present.
- Building 146 - No ACMs present.
- No buildings are located within subparcels B1-W-1, OS-A-1, OS-C-2, OS-R-1 through 5, SPUD-1, SPUD-4 through 7, SR-W-1, SR-R, and SSE.

DoD policy on asbestos at BRAC properties of 12 Jan 95 states that ACM shall be remediated prior to property disposal only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property (i.e., it is friable, accessible, and damaged [FAD]). Because none of the identified ACM within the subject subparcels has been identified as FAD (see Table 1), the Navy is not required to conduct asbestos abatements. Subsequent to this FOST but prior to transfer, the Navy will implement the DoD policy regarding ACM in accordance with a written statement of facility specific utilization or non-utilization as provided by the Local Reuse Authority (i.e., the SSTTDC). A copy of the DoD policy on asbestos is presented in the *BRAC Cleanup Plan* of Aug 98.

As previously described in this EBST and in enclosure (5), NFA is required for the three ACM-related EBS RIAs located within, or partially within, the FOST subparcels (i.e., EBS RIAs 42, 46, and 51).

The possibility remains for the presence of undiscovered ACMs associated with underground utilities at NAS South Weymouth. As part of the property transfer, NAS South Weymouth will provide utility maps of the base property.

Lead-Based Paint

The *PIH Survey and Materials Update for Asbestos and LBP Report* of Aug 01 documented the current paint conditions for the buildings at the main base of NAS South Weymouth. Table 1 summarizes the paint conditions for the buildings included in this FOST.

No residential reuse is planned for the buildings within the subject subparcels. In accordance with the *DoD Policy on LBP at BRAC Properties* of 12 Jan 95, lead abatement is not required for buildings that are scheduled for non-residential use. However, if the grantee decides to modify the planned reuse such that a building in this FOST would be reused for residential purposes or for purposes that include the presence of children under the age of 6 years, then the grantee shall assess potential LBP hazards for such uses and, prior to occupancy, shall complete any required abatements or engineering controls in accordance with applicable Federal, State, and local regulations [see clause 8(h) of enclosure(2)].

Lead in Drinking Water Fountains

As documented in the BCP of Aug 98, the Base Environmental Office completed a testing of lead in drinking water at NAS South Weymouth from Jul to Sep 92. This included all 44 drinking water fountains at the main base, testing at 25 basewide priority areas, and testing at 259 housing water taps. Of the 44 basewide drinking water fountains, only two locations (Buildings 11 and 121) had samples with reported lead concentrations above the action level (at that time) of 35 micrograms of lead per liter of water (ug/L). Building 11 is not located within this FOST. Building 121 is located in subparcel SPUD-1. The elevated lead concentrations in those two drinking water fountains was believed to be due to lead solder used in old pipes. The Navy decommissioned and replaced those two fountains. The current action level for lead in drinking water is 15 ug/L. The 1992 sample results for the remaining water fountains in the buildings contained within this FOST (concentrations ranging from "below method detection limit" to 6 ug/L) do not exceed the current action level of 15 ug/L. Therefore, NFA is required by the Navy to address lead in drinking water fountains.

Aboveground Storage Tanks and Underground Storage Tanks (UST)

The following USTs and ASTs are currently, or were formerly, located within the subject subparcels of this EBST:

- Building 32 (Youth Center) in subparcel OS-W-1 was formerly heated by No. 2 fuel oil stored in a bermed 275-gallon AST located to the southeast of the building. As documented in the *Removal Action Report* of Jan 99, the AST was removed on 19 Jun 98. The return and feed lines were detached from the boiler, rinsed, and disposed with the AST. No signs of spills or staining were observed. A new bermed, 275-gallon AST was installed after removal of the old AST was completed.
- Building 24 (Former Dispensary) in subparcel OS-C-1 was formerly heated by No. 2 fuel oil stored in a 2,000-gallon UST (No. 10) located between Building 98 and Building 24. The Navy removed the UST and approximately 100 CY of soil on 12 Aug 97. The Navy has implemented an AUL to address petroleum-impacted soil beneath Building 98 associated with this former UST [see clause 8(b) of enclosure (2)].
- Building 31 (BOQ) in subparcel INST-1 was formerly heated by No. 2 fuel oil that was stored in a 3,000-gallon UST (No. 11)

located north of the building below a small courtyard. The UST was installed in 1959 and was removed in Aug 97 under the MCP due to the presence of soil impacted by fuel oil spills. As summarized in enclosure (4) and clause 8(c) of enclosure (2), an AUL has been established for 7,269 +/- SF beneath a portion of the Building 31 foundation to address residual concentrations of petroleum-related compounds in soil.

- Building 49 (Transient VIP Housing) in subparcel INST-1 was formerly heated by No. 2 fuel oil that was stored in a 550-gallon UST (No. 13). The Navy has removed the UST and replaced it with a 330-gallon, bermed, double-walled AST for No. 2 fuel oil.
- Building 141 (SSTDC Office) in subparcel OS-C-1 is heated by fuel oil stored in a 275-gallon AST located indoors on the south side of the building. There is no history of spills or releases from this AST and the AST is in compliance with applicable environmental laws and regulations.
- Building 146 (New Tower) in subparcel OS-A-1 has an active, double-walled, 3,000-gallon AST containing No. 2 fuel oil. There is no history of spills or releases from this AST.
- Building 133 (Main Gate Security) in subparcel OS-C-1 has been heated by two separate oil boilers since 1986. The fuel oil for the boilers is stored in a 550-gallon, fiberglass UST (UST#35) located south of the building. The UST passed tracer tests conducted in 1993, 1994, and 1995 (no more recent tests conducted). The tests were conducted by Tracer Research Corporation under contract number N62472-90-D-1298. The UST meets the 40 CFR 280 requirements of Dec 98. There is no history of spills or leaks associated with this UST.
- Building 102 (Former NEX) had three gasoline USTs (two at 6,000-gallons and one at 10,000-gallons) for a vehicle filling station. The Navy removed these USTs along with some petroleum-impacted soil under the MCP.

Radon

The *BRAC Cleanup Plan* documented the DoD's voluntary approach to sampling and documenting potential radon exposure at NAS South Weymouth. In 1989, the Navy completed a radon screening at the Main Base, Squantum Gardens, and Naval Terrace. The results indicated that none of the facilities or housing units at these locations had radon levels above the EPA's advisory action level of 4 picocuries per liter (pCi/L). Zoning subparcels B1-W-1, OS-C-2, OS-R-1 through 5, OS-W-3, SPUD-2 and SPUD-4 through 7, SR-R, and SR-W-1 do not contain buildings; therefore, a radon screening was not conducted in those areas.

Radiological Materials

As stated in the *BRAC Cleanup Plan*, there is no documentation indicating the presence of radioactive materials at NAS South Weymouth. Past operations at NAS South Weymouth may have included use of some low-level radioactive materials (e.g., maintenance of luminescent aircraft/vehicle dials) in areas outside of the subparcels that are part of this FOST (e.g., in the hangars). The BCT has investigated possible radiological materials usage with the Radiological Affairs Support Office (RASO). RASO found no evidence of radiological materials in the hangars at NAS South Weymouth.

Several x-ray machines were formerly present in Building 24. The Navy has moved the x-ray machines out of Building 24 and the FOST subparcels. As a voluntary, precautionary measure, the Navy completed a screening of radiation levels in Building 24. As documented in the *Safety and Health Assessment* of Jul 00, radiation measurements did not exceed background concentrations at any of the sampling locations. Therefore, NFA is required.

Pesticides

No information is available regarding the specific past use of pesticides within the FOST subparcels. The *Phase I EBS* of 18 Nov 96 documents that NAS South Weymouth developed a Pest Management Plan which is part of the Natural Resources Management Plan of 30 Sep 87 (updated during 1992). A summary of the pesticide/herbicide/pest management requirements is presented in Table 5-16 of the *Phase I EBS*. No additional records of pesticide use prior to 1987 have been found (although activity personnel confirmed that pesticides were used at NAS South Weymouth prior to 1987). The *Phase I EBS* states that

no items of concern were cited by EPA during their 8 Aug 93 Pesticide Use Investigation for the pesticide storage and use at NAS South Weymouth. Although residual concentrations of pesticides/herbicides may be present in soil resulting from the past applications as part of upkeep of NAS South Weymouth, no pesticide/herbicide-related EBS RIAs have been identified within, or have impacted, the subject subparcels of this FOST.

Medical Wastes

Building 24 (Dispensary) was formerly used as medical facility. The *Phase I EBS* of 18 Nov 96 reported that several of the examination rooms contained biohazard waste containers and infectious waste boxes. A biohazard sign currently remains on the door of the laboratory room. The *Phase I EBS* also identified several boxes of used immunization needles in Building 25 (Dispensary Garage). The boxes of used needles in Building 25 have been removed. However, as documented in the *Safety and Health Assessment* of Jul 00, no biomedical hazards or waste materials are currently present in Buildings 24 or 25. No sharp containers, used disposable medical products, soiled laundry, or biohazard waste bags are present.

Building 24 also included a dental clinic. As a precautionary measure, the Navy completed a voluntary screening of the air in the dental area for potential mercury vapors. As documented in the *Safety and Health Assessment* of Jul 00, no mercury vapors were detected at any of the sampling locations. NFA is required.

No other areas within the subject subparcels are associated with potential medical wastes.

Solid Waste

As stated in DoD BRAC guidance (*Fast Track to FOST* of Fall 96), the FOST is a determination that the subject property is environmentally suitable for transfer by deed under Section 120(h) of CERCLA. CERCLA Section 120(h) requires that notice be given, both in deed and contracts for sale, of the storage, release, or disposal of hazardous substances. As such, the FOST documents that the subject property is suitable for transfer because no hazardous substances are known to have been released or disposed of on the property or because the requirements of CERCLA Section 120(h)(3) have been met for the property.

Solid waste is not regulated under CERCLA Section 120(h). DoD BRAC guidance for FOSTs states that, in some cases, it may be required that certain hazards not regulated under CERCLA be disclosed, according to the policies of the particular DoD component (i.e., Navy), and that restrictions on use related to those hazards be stated in the deed of transfer. Such disclosures and restrictions should be described in the FOST. Non-CERCLA hazards can include issues such as solid waste, petroleum products, and safety concerns.

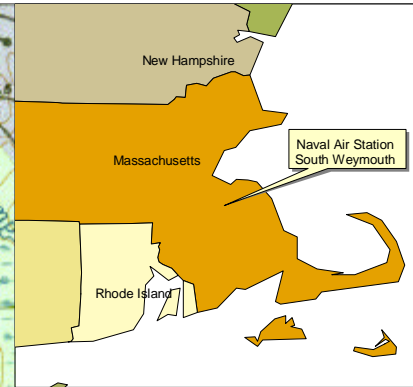
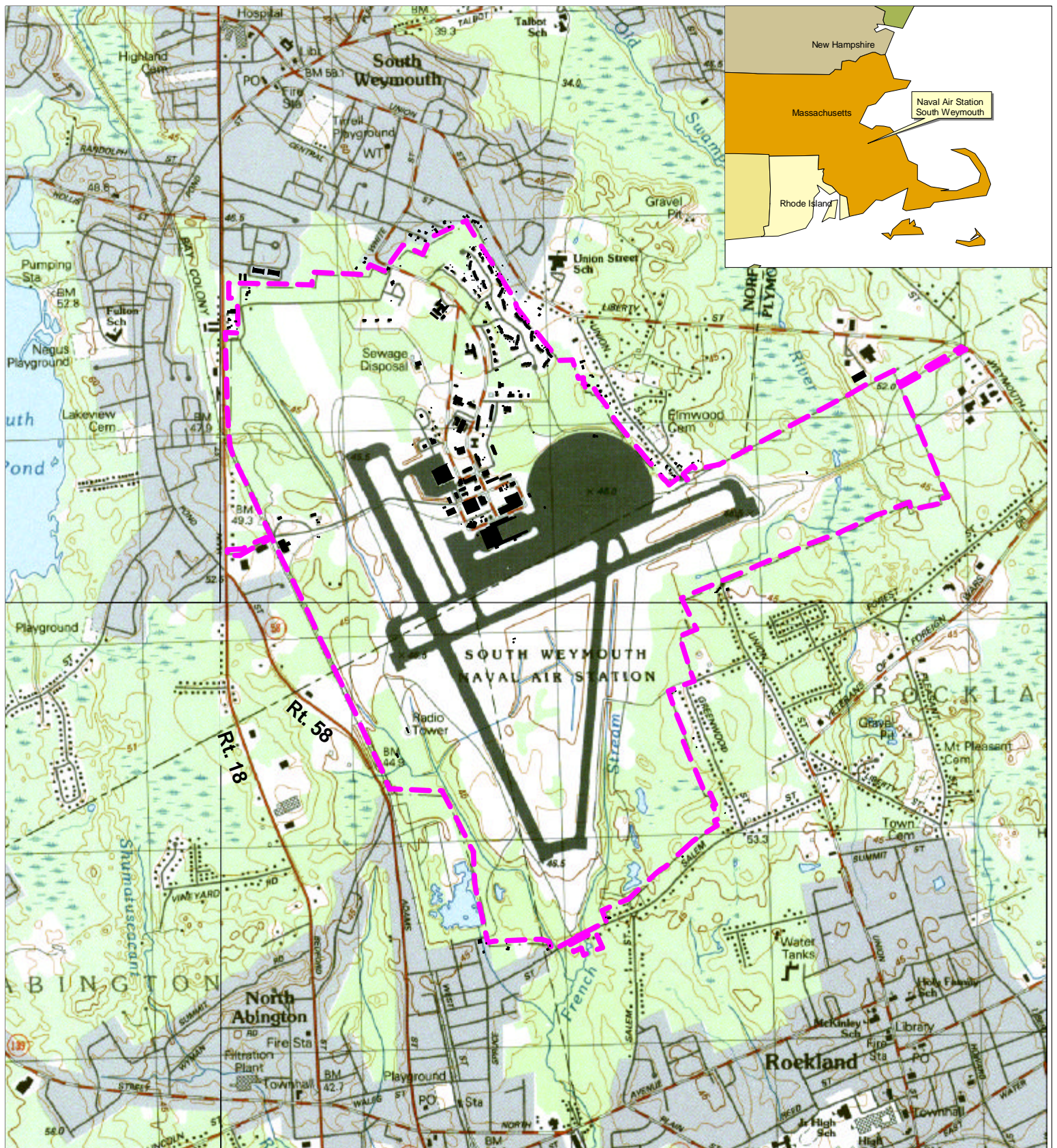
Therefore, the presence of solid waste in the subject subparcels does not preclude the FOST provided that notification and any necessary restrictions are included in the FOST document. Enclosure (7) of this FOST summarizes the types, quantities, locations, and current status (present/removed) of solid waste within the FOST subparcels.

Separately from the FOST, the Navy coordinated with the State DEP management officials and the redevelopment authority (i.e., the SSTDC) regarding the status of the solid waste debris areas with respect to the pending property transfer. The Navy's inventory of solid waste debris within the FOST subparcels, and the plan to address that inventory, were presented to MADEP in the Navy's letter of 19 Oct 01.

Notice of CERCLA Hazardous Substances

In accordance with CERCLA Section 120(h)(1), 40 CFR 373, notice is required when a hazardous substance has been stored for one year or more and applies only when the substances are or have been stored in quantities greater than or equal to 1,000 kilograms or the substance's reportable quantity, whichever is greater. There are no records or knowledge that hazardous materials, listed under 40 CFR 261.30 as acutely hazardous waste, were stored for one year or more, in excess of 1 kilogram. Notice is also required when hazardous substances are or have been stored, released, or disposed of in quantities greater than or equal to the substance's CERCLA-reportable quantity. Hazardous substances and petroleum products formerly used, released, or disposed of in the subject subparcels are listed in Table 2. Limited information was available on historical quantities of substances and length of storage. It is unknown whether the quantities of hazardous substances present within the subject subparcels were sufficient to warrant

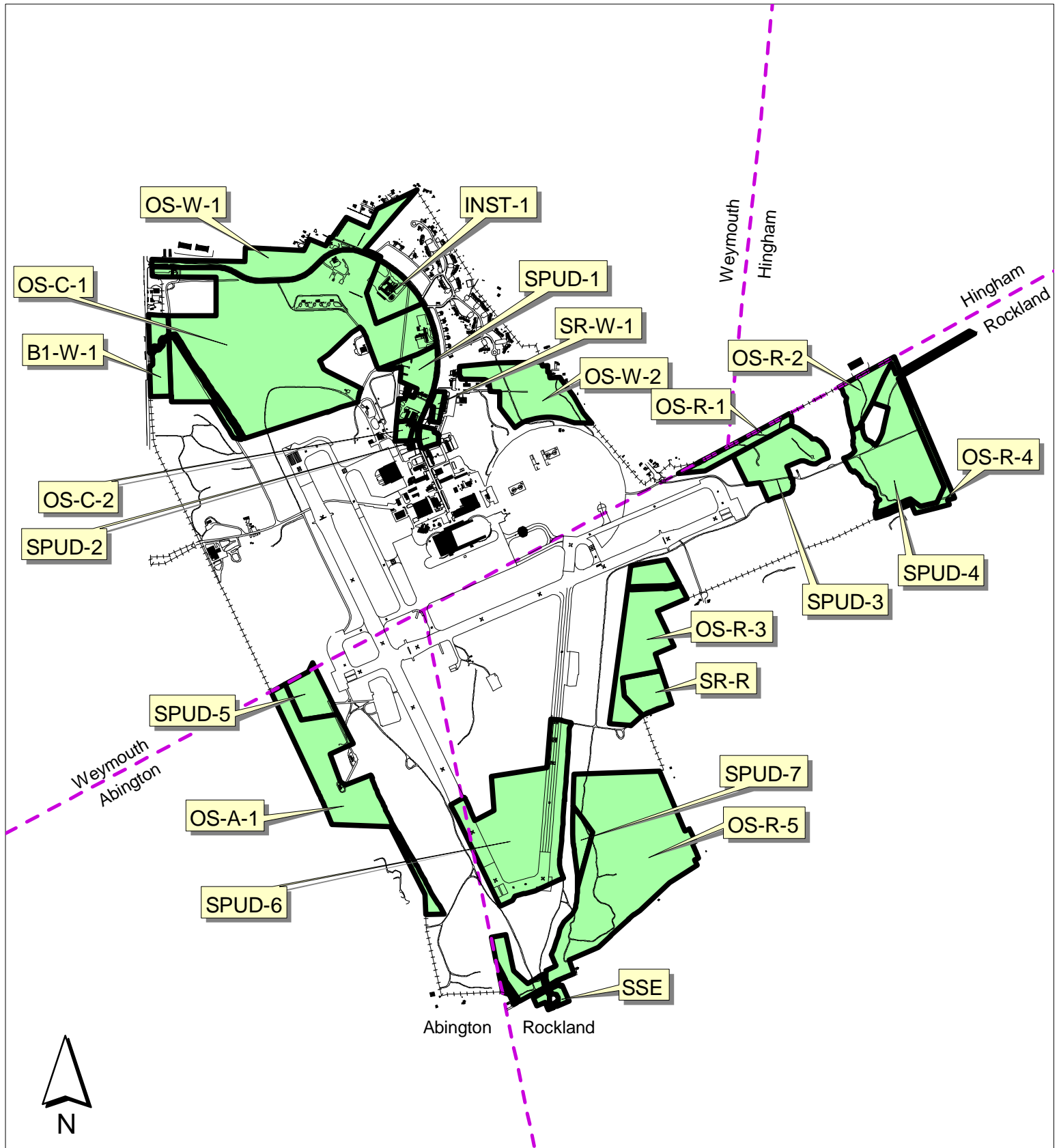
CERCLA notice; therefore, notice of hazardous substances under CERCLA 120(h)(1) is provided in Table 3 based on available information.



2000 0 2000 4000 Feet

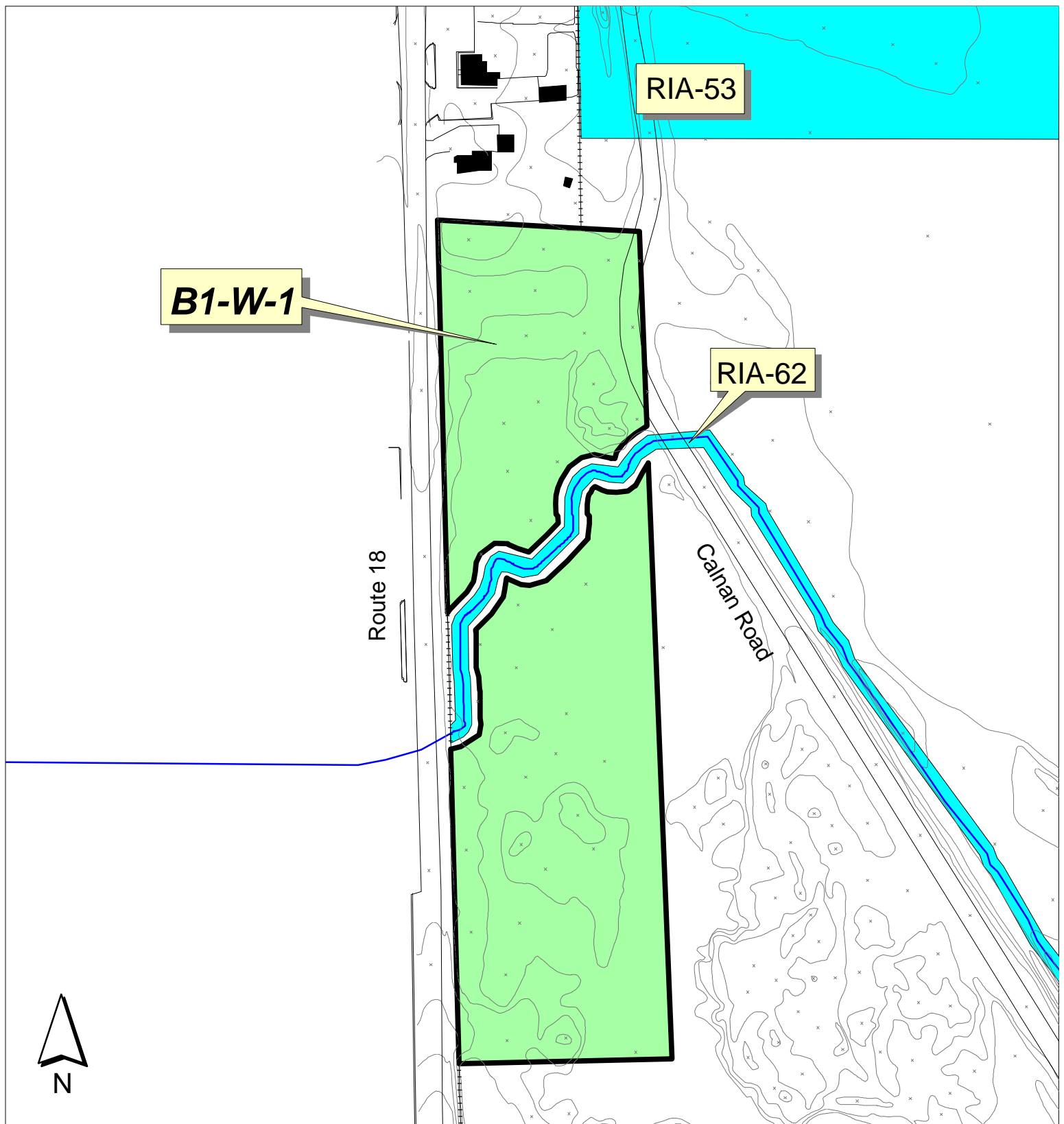
 NAS South Weymouth Perimeter

Figure 1
Main Base Location Map



- Property Fenceline
- Roads & Pavement
- Town Lines
- Buildings & Facilities
- FOST Subparcels

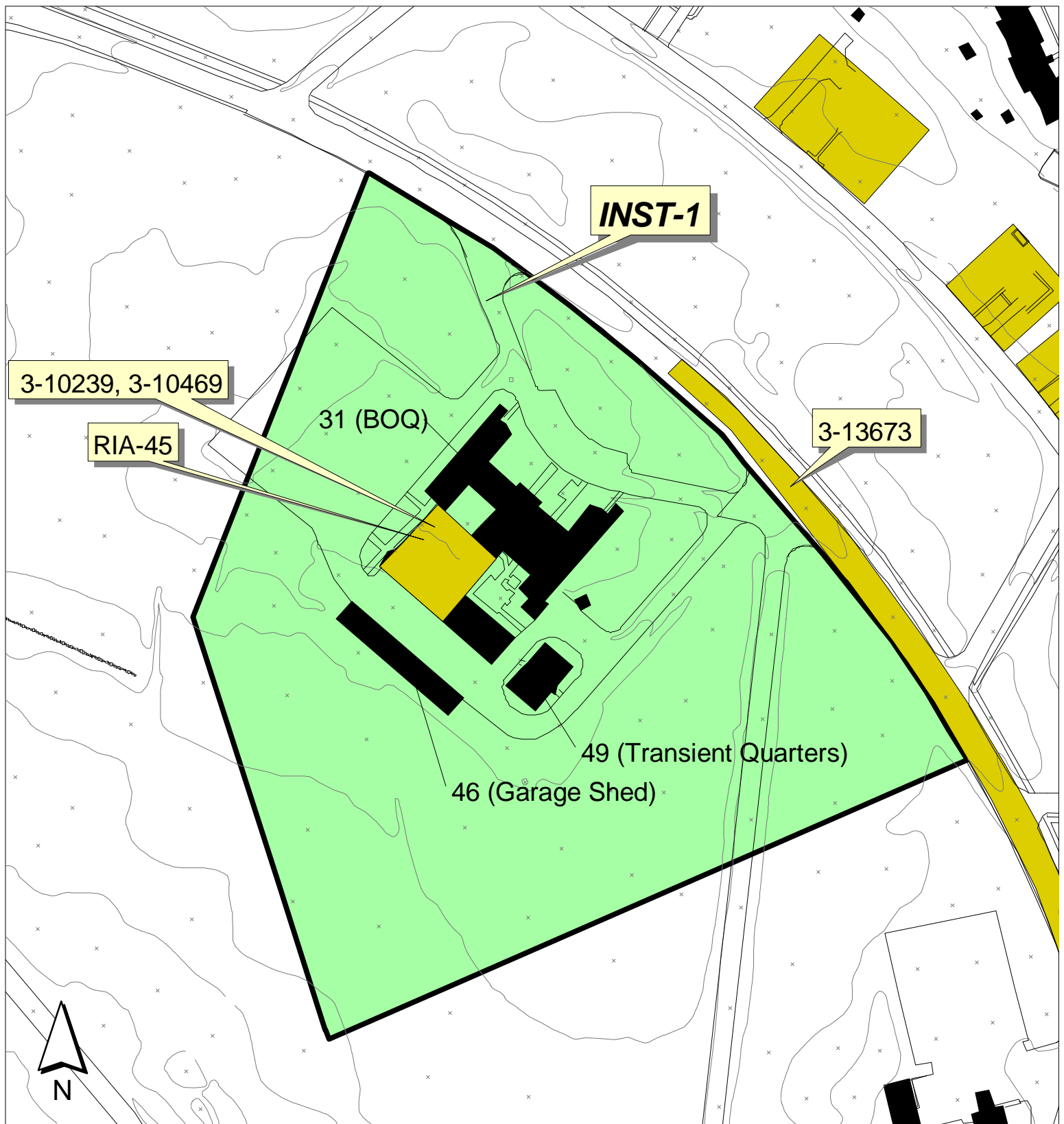
Figure 2
Subparcels Included
in this FOST



- Property Fenceline
- Roads & Pavement
- Topographic Contours
- French Stream
- Buildings & Facilities
- EBS RIAs (approximate)
- FOST Subparcel

100 0 100 200 300 400 Feet

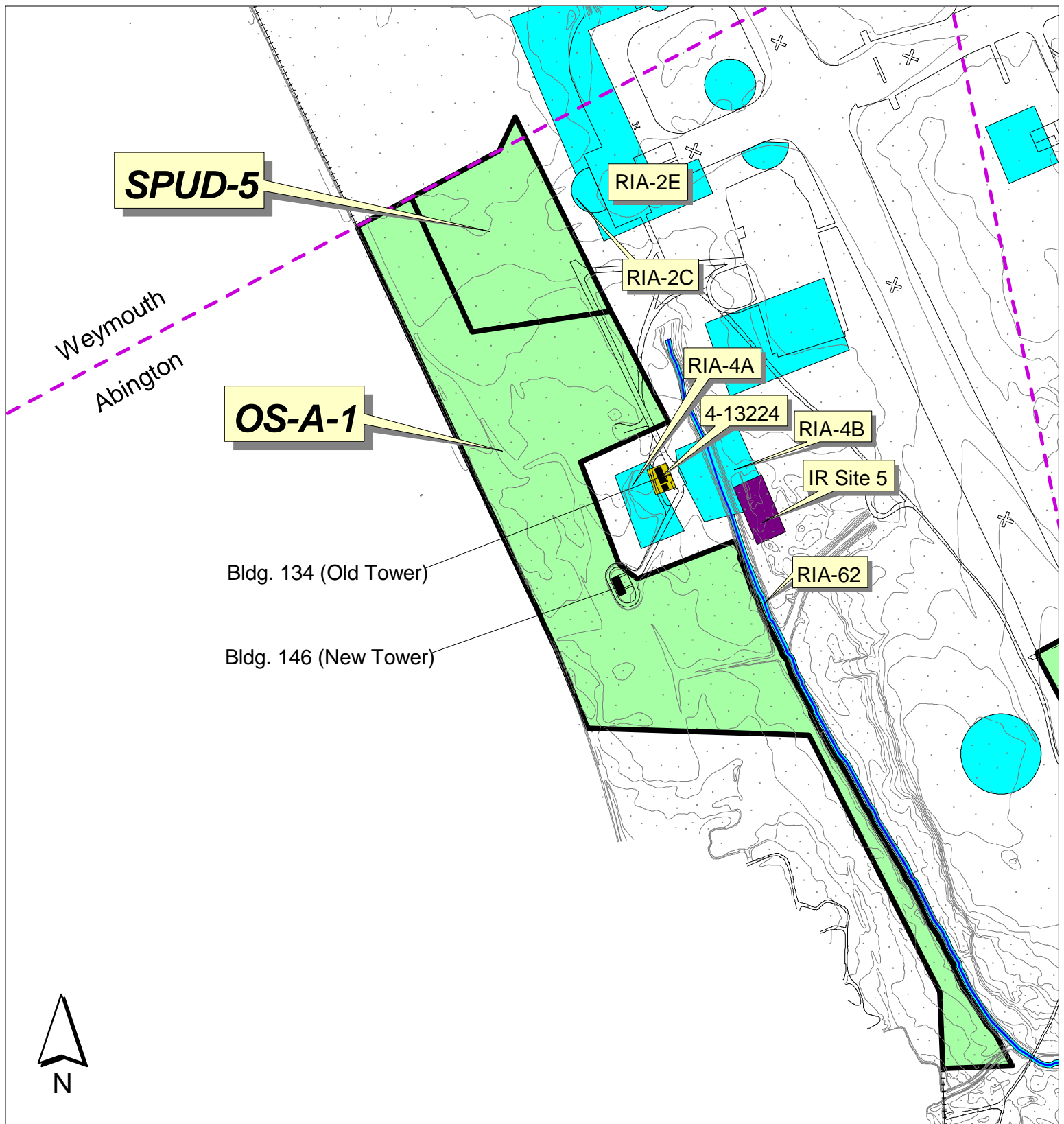
Figure 3
Subparcel B1-W-1



- Roads & Pavement
- Topographic Contours
- MCP Sites (approximate)
- Buildings & Facilities
- EBS RIAs (approximate)
- FOST Subparcel

Note: Only environmental sites within 200 ft of INST-1 are labeled.

Figure 4
Subparcel INST-1



- Property Fenceline
- Roads & Pavement
- Town Lines
- French Stream
- Topographic Contours
- Buildings & Facilities
- IR Program Sites (approximate)
- MCP Sites (approximate)
- EBS RIAs (approximate)
- FOST Subparcels

500 0 500 1000 Feet

Figure 5
Subparcels OS-A-1 and
SPUD-5

Note: Only environmental sites within 200 ft of the FOST subparcels are labeled.

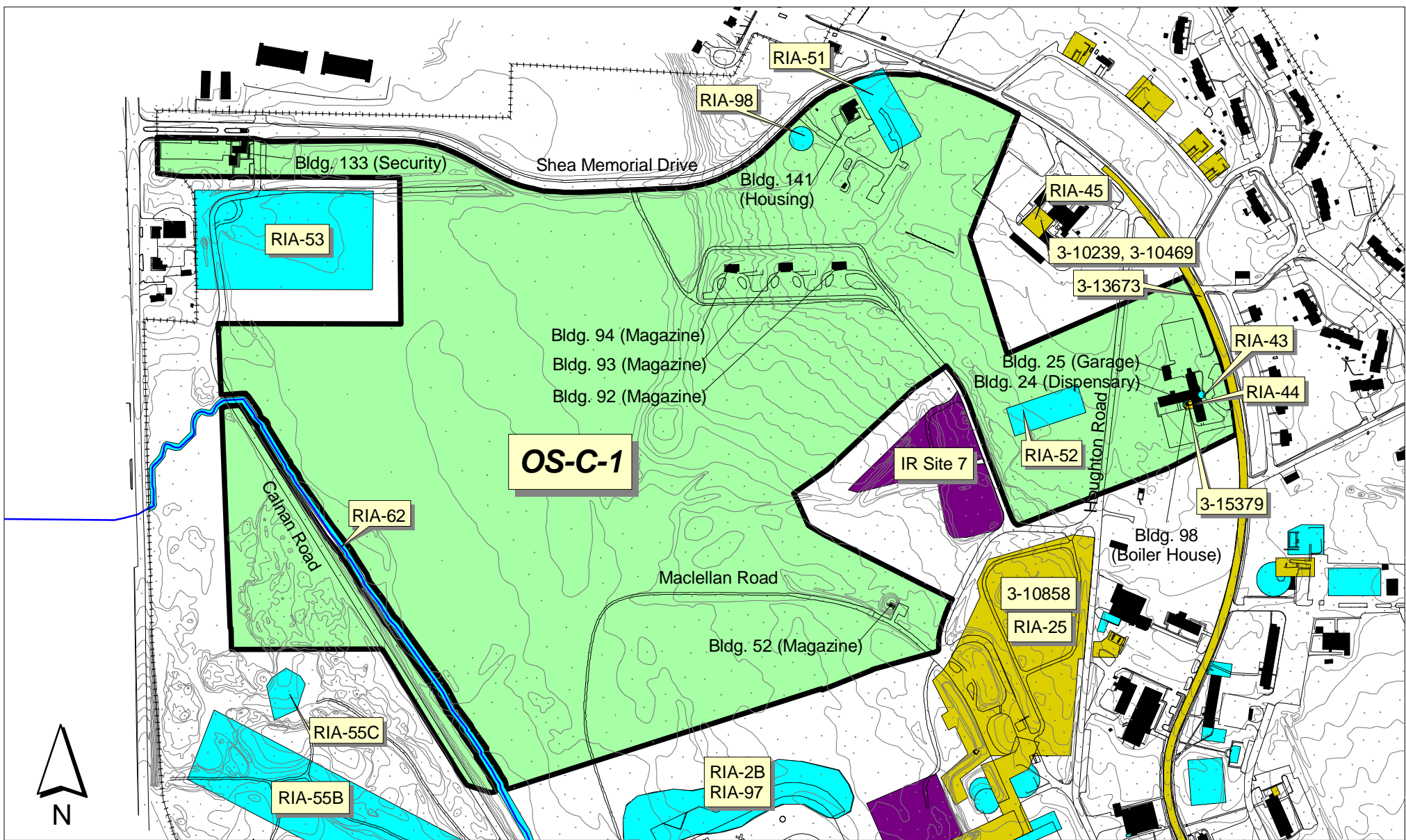


Figure 6
Subparcel OS-C-1

- Property Fenceline
- Roads & Pavement
- French Stream
- Topographic Contours
- IR Program Sites (approximate)
- MCP Sites (approximate)
- EBS RIAs (approximate)
- Buildings & Facilities
- FOST Subparcel

500 0 500 1000 Feet

Note: Only environmental sites within 200 ft of OS-C-1 are labeled.

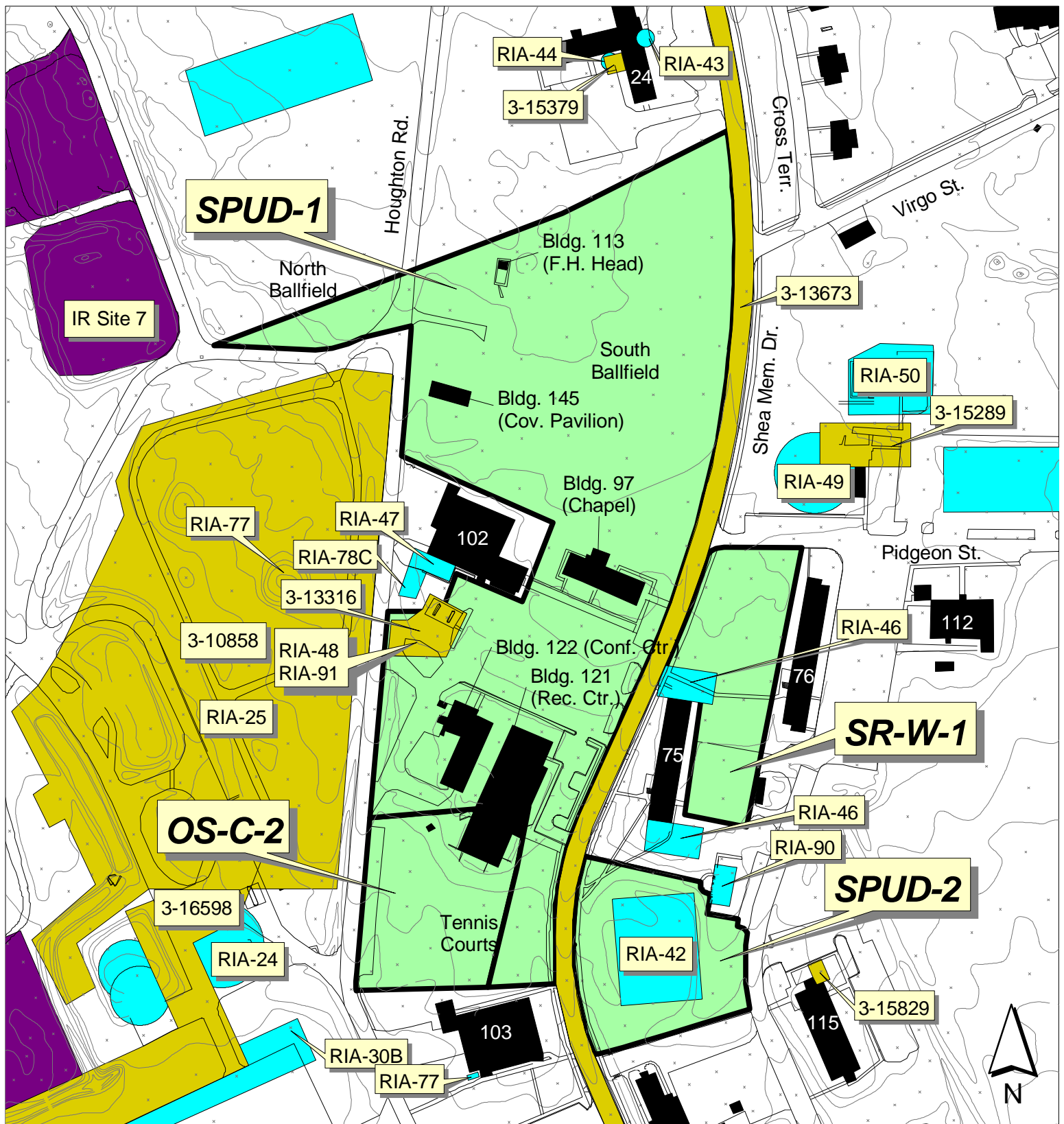
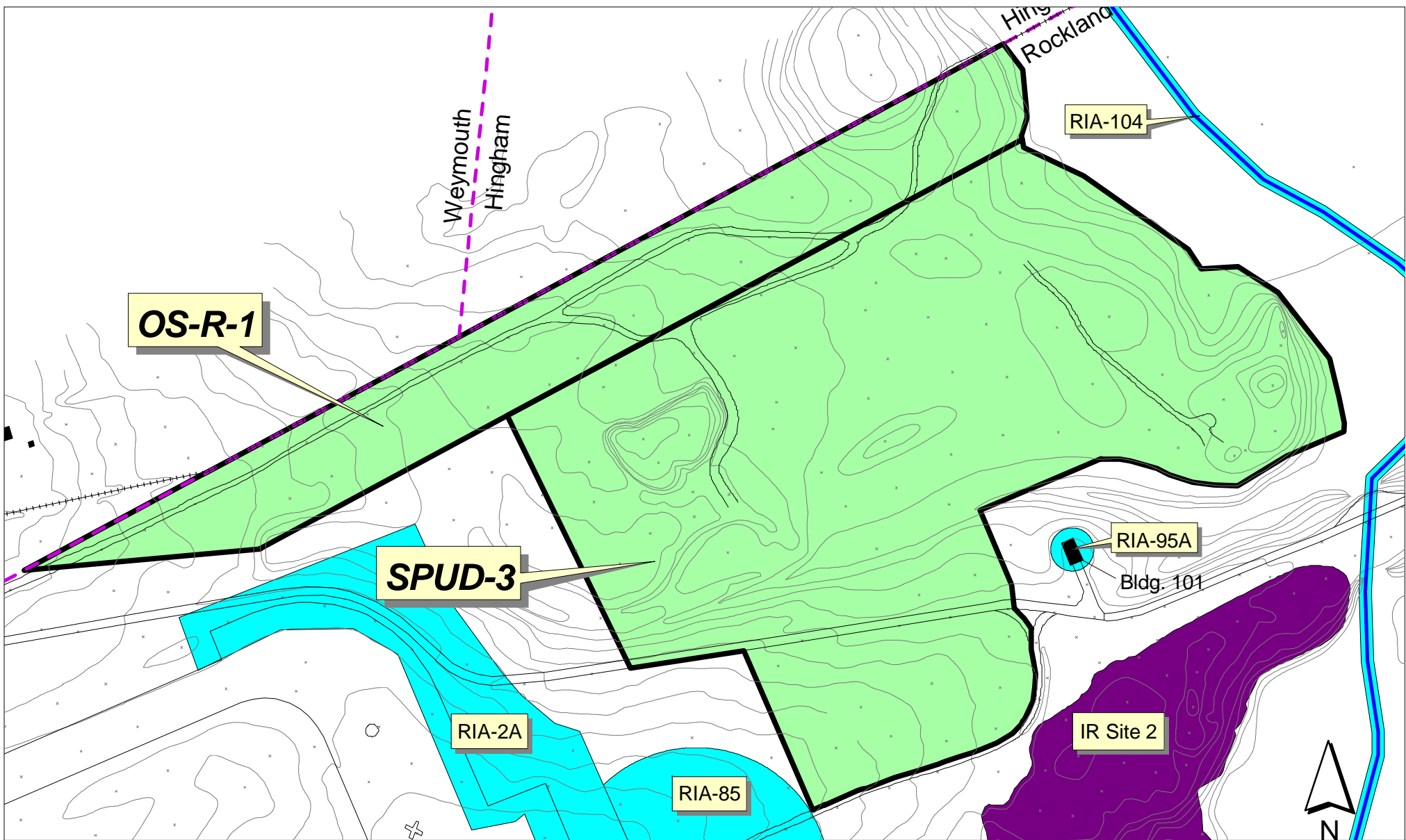


Figure 7
Subparcels OS-C-2, SPUD-1,
SPUD-2, and SR-W-1

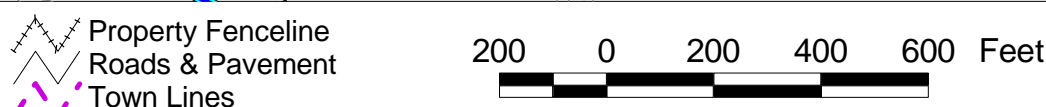
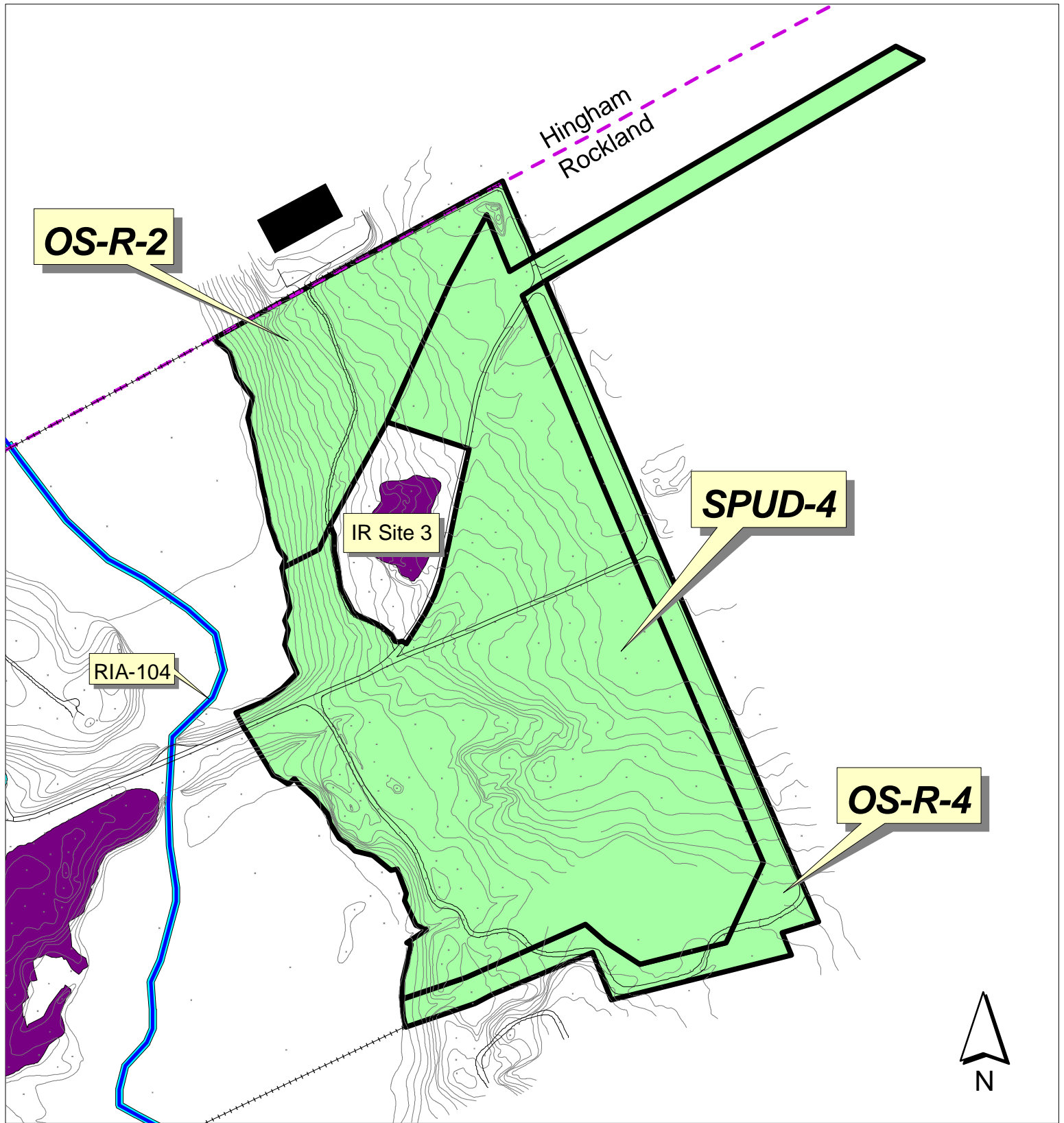
- Property Fenceline
- Roads & Pavement
- Topographic Contours
- IR Program Sites (approximate)
- MCP Sites (approximate)
- EBS RIAs (approximate)
- Buildings & Facilities
- FOST Subparcels

Note: Only environmental sites within 200 ft of the FOST subparcels are labeled.



- Property Fenceline
- Roads & Pavement
- Town Lines
- Old Swamp River
- Topographic Contours
- Buildings & Facilities
- IR Program Sites (approximate)
- EBS RIAs (approximate)
- FOST Subparcels

Figure 8
Subparcels OS-R-1 and SPUD-3



- Property Fenceline
- Roads & Pavement
- Town Lines
- Old Swamp River
- Topographic Contours
- Buildings & Facilities
- IR Program Sites (approximate)
- EBS RIAs (approximate)
- FOST Subparcels

Figure 9
Subparcels OS-R-2,
OS-R-4, and SPUD-4

Note: Only environmental sites within 200 ft of the FOST subparcels are labeled.

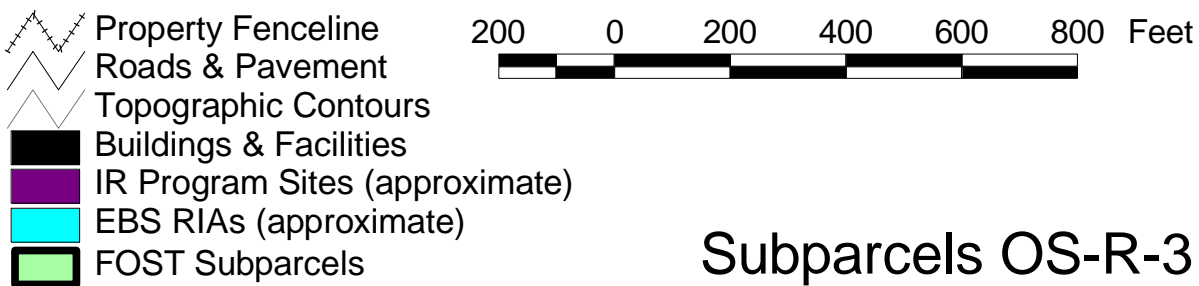
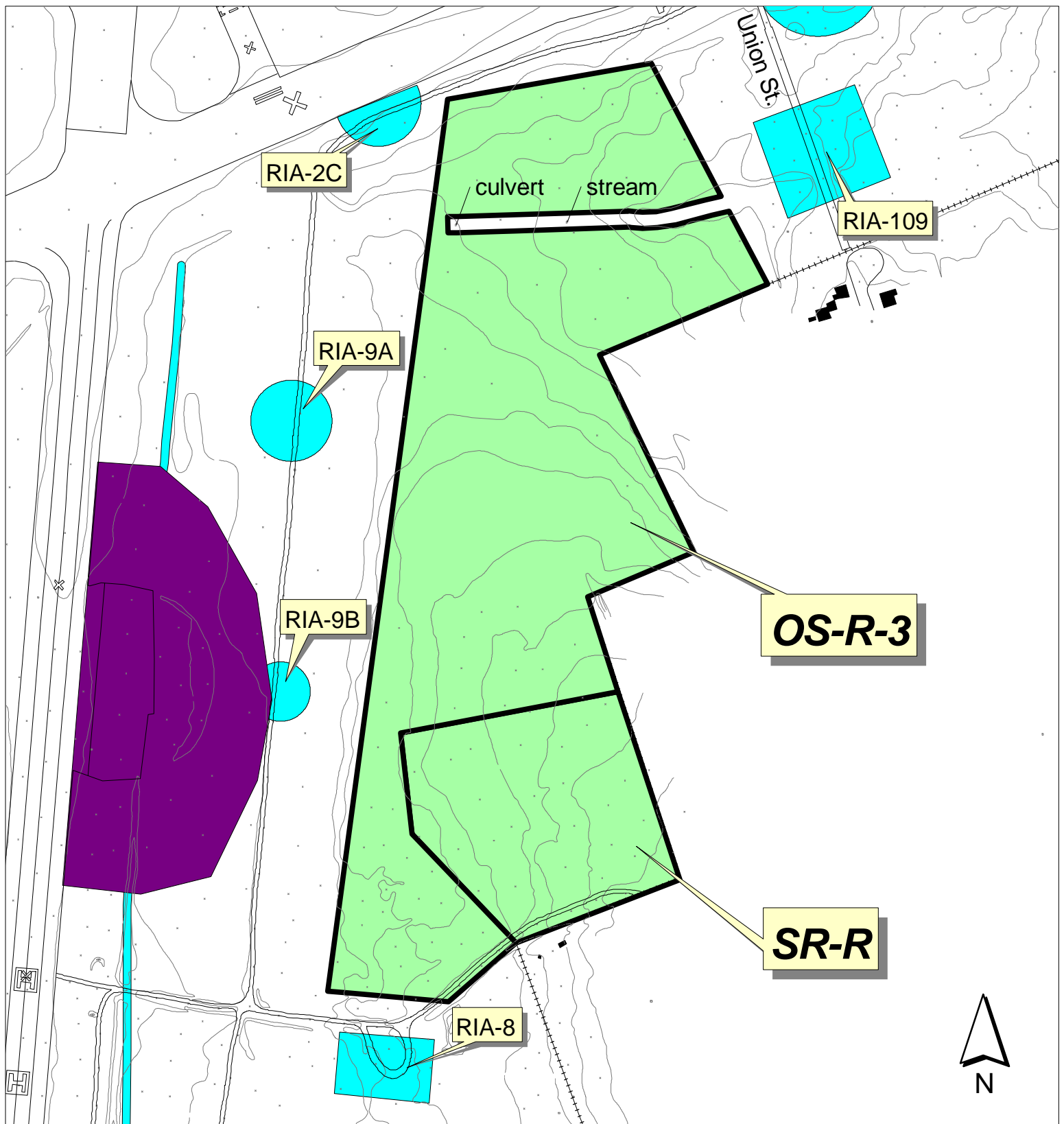
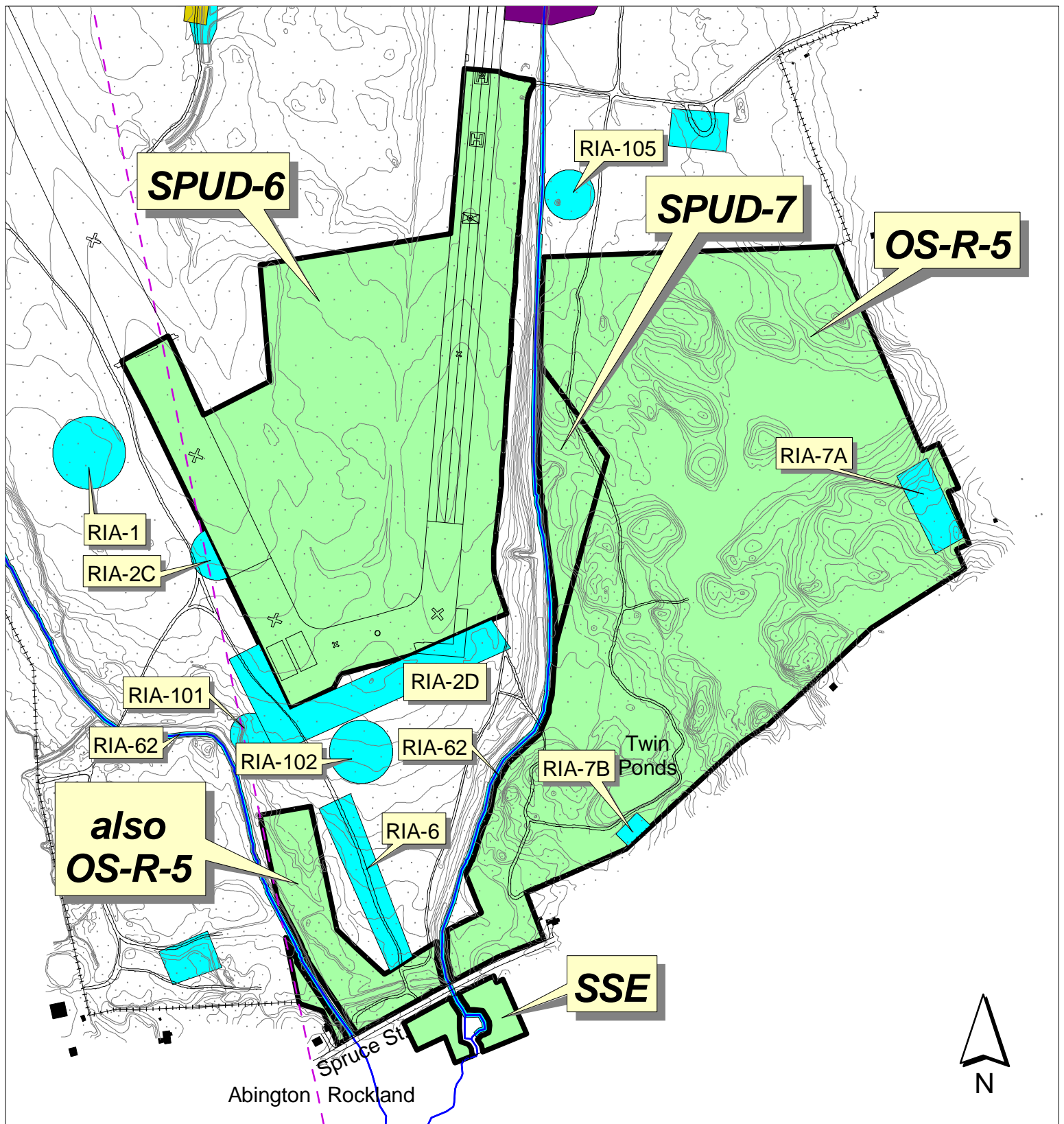


Figure 10
Subparcels OS-R-3 and SR-R

Note: Only environmental sites within 200 ft of the FOST subparcels are labeled.



- Property Fenceline
- Roads & Pavement
- French Stream
- Town Lines
- Topographic Contours
- Buildings & Facilities
- IR Program Sites (approximate)
- MCP Sites (approximate)
- EBS RIAs (approximate)
- FOST Subparcels

400 0 400 800 Feet

Figure 11
Subparcels OS-R-5, SPUD-6,
SPUD-7, and SSE

Note: Only environmental sites within 200 ft of the FOST subparcels are labeled.

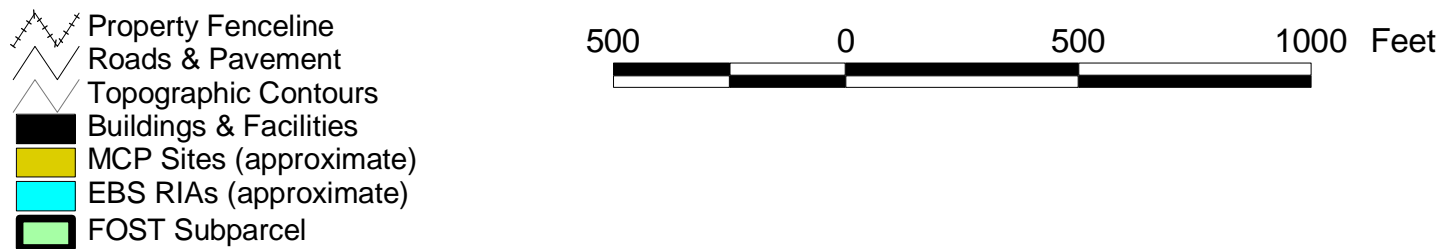
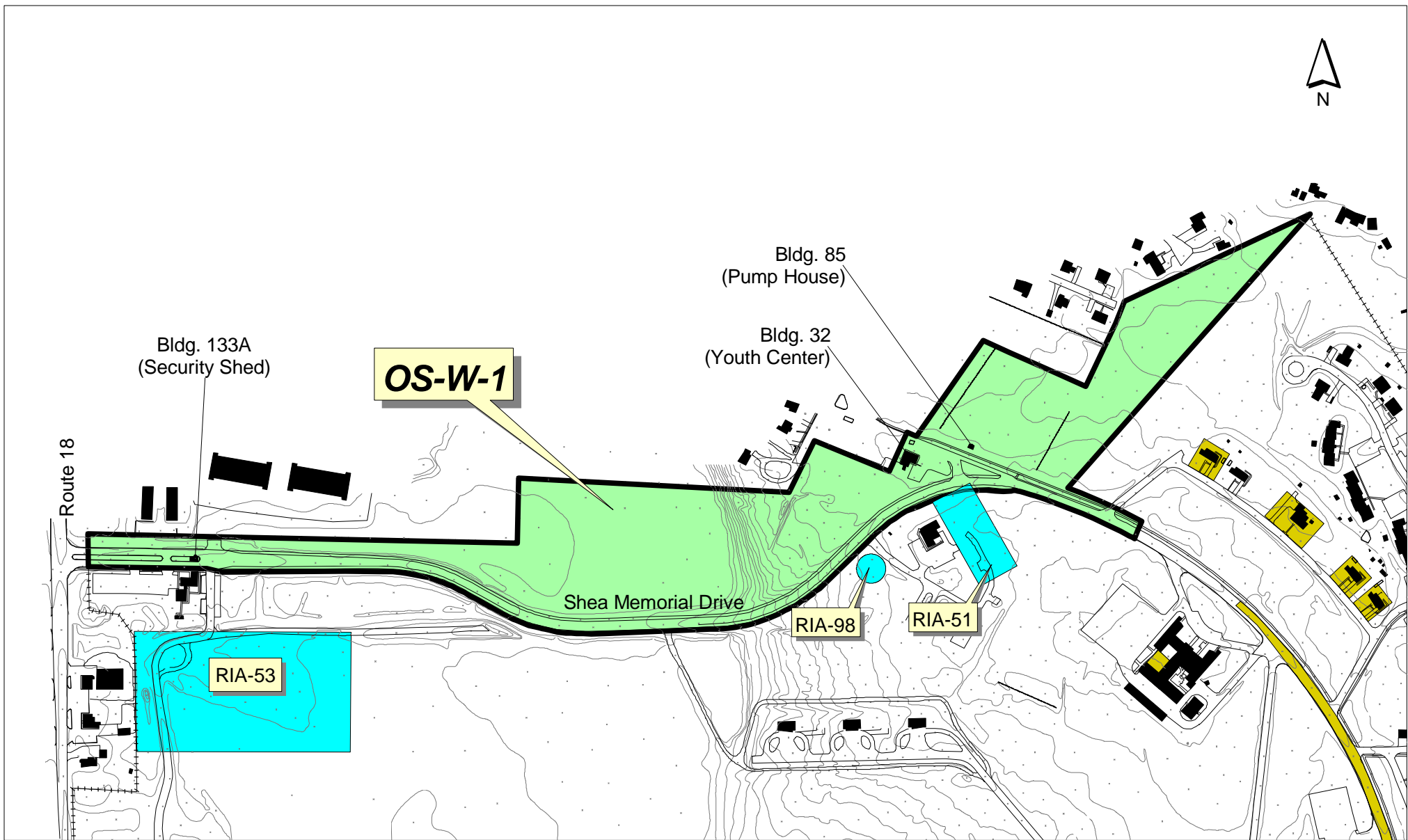
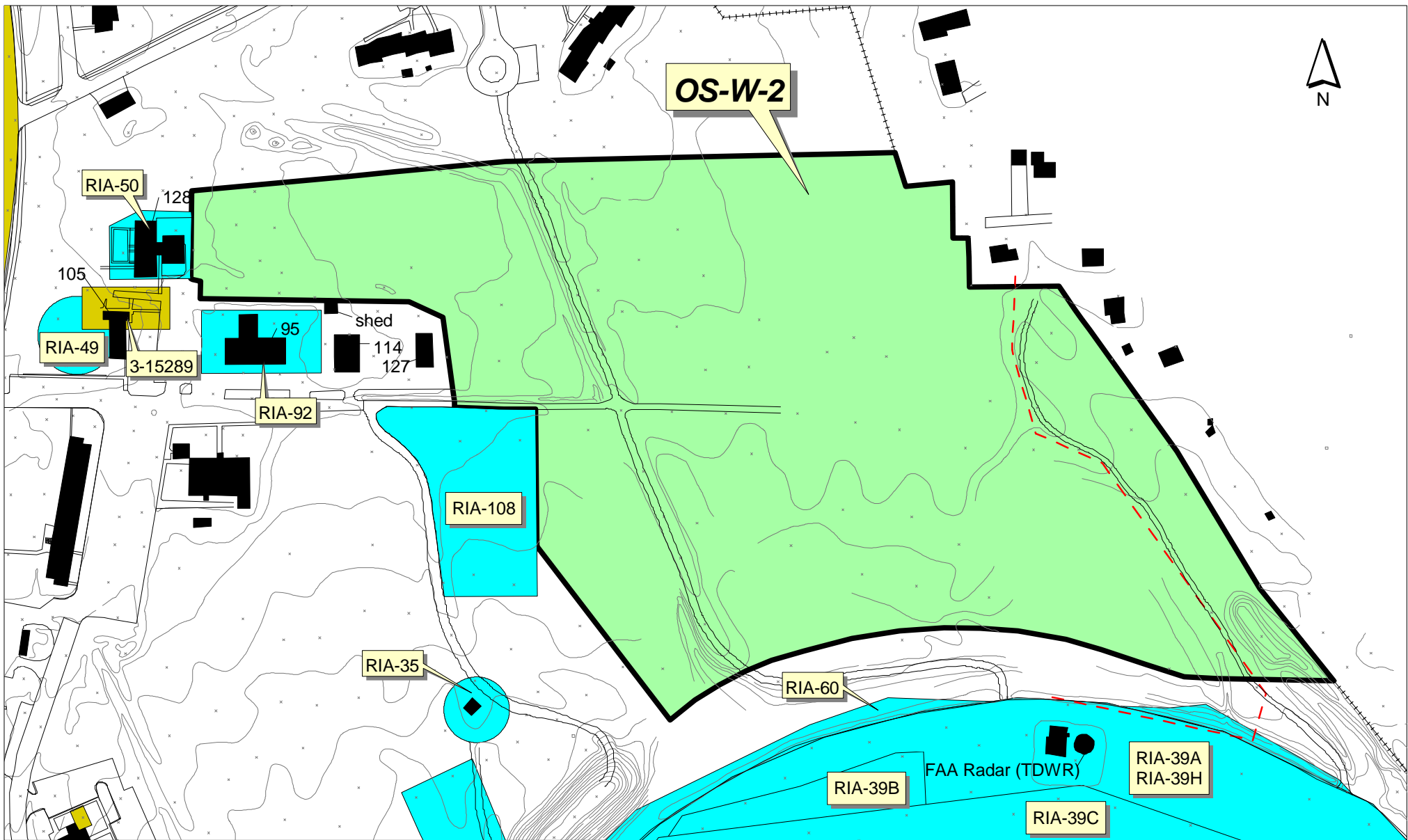


Figure 12
Subparcel OS-W-1

Note: Only environmental sites within 200 ft of OS-W-1 are labeled.



- Property Fenceline
- Roads & Pavement
- Utility Easement for FAA Radar
- Topographic Contours
- Buildings & Facilities
- MCP Sites (approximate)
- EBS RIAs (approximate)
- FOST Subparcel

200 0 200 400 600 Feet

Figure 13
Subparcel OS-W-2

Note: Only environmental sites within 200 ft of OS-W-2 are labeled.

TABLE 1 SUMMARY OF CONDITIONS
SUBPARCELS B1-W-1, INST-1, OS-A-1, OS-C-1 AND 2, OS-R-1 THROUGH 5, OS-W-1 AND 2, SPUD-1 THROUGH 7, SR-R, SR-W-1, AND SSE (486.75 TOTAL ACRES), SOUTH WEYMOUTH, MA

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
ZONING PARCEL 1					
B-1W-1	None	Yes	This subparcel was used as open space (forested) along the base perimeter.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
ZONING PARCEL 2					
INST-1	31	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 31 (Bachelors Officers Quarters - BOQ) was built in the 1940s as a 3-story building used for the short-term occupancy by military personnel. The BOQ was operated like a hotel and had a capacity of 92 people. It contains a restaurant/bar and two separate basements.	2	<ul style="list-style-type: none"> RIA 45 (BOQ Oil Release to Floor Drain) - As summarized in enclosure (5), No Further Action (NFA) is required for RIA 45 under the EBS program because the release was addressed under the MCP program (RTN 3-10469 - see below). Massachusetts Contingency Plan (MCP) Release Tracking Numbers (RTNs) 3-10239 and RTN 3-10469 (BOQ Fuel Oil Spills) - As summarized in enclosure (4), the Navy has closed these RTNs through a combined, Class A-3 RAO. As outlined in clause 8(c) of enclosure (2), an Activity and Use Limitation (AUL) was filed for 7,269 +/- SF located beneath the portion of the building footing (see Figure 4) to address residual petroleum in the subsurface soil. The <i>Potential Immediate Hazard (PIH) Survey</i> of Sep 99 reported localized fungal growth and airborne fungal spores in several areas of the building (basement in particular). Although the fungal hazards were not reported to be severe, they may pose a hazard to

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
					<p>sensitive individuals. Therefore, the PIH Survey recommended that disposable respirators be worn in the basement. The <i>PIH Survey</i> of Aug 01 reported water leaks in the basement and that disposable foot coverings are recommended in the basement due to extensive mold growth. This hazard is addressed in clause 8(f) of enclosure (2).</p> <ul style="list-style-type: none"> • The <i>PIH Survey</i> of Aug 01 reported that asbestos-containing materials (ACMs) remain in good condition and no restrictions were identified. The <i>Phase I EBS</i> of 18 Nov 96 reported a basement boiler wrapped in plastic had an asbestos warning label; however, the boiler insulation is no longer present. • The <i>PIH Survey</i> of Aug 01 reported that small amounts of peeling paint are present on the ceilings and walls in several areas. Paint was also observed on the floor in the kitchen and on the wooden steps leading to the basement. A dust wipe sample from the floor in the building did not contain lead above the OSHA threshold concentration of 200 µg/SF. Minor amounts of peeling paint are present on the building's exterior. No restrictions were identified. A previous version of the <i>PIH Survey</i> (Nov 99) reported that lead dust was present on the floor in the kitchen and on the wooden steps leading to the basement. Because Building 31 will not be used for residential purposes in the future, NFA is required by the Navy for this lead dust. However, see clause 8(a) of enclosure (2) for requirements regarding potential lead dust in this area.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
INST-1	46	Yes	Building 46 (Garage) was used by BOQ occupants to park their vehicles. The garage is a one-story, 3,336 square foot (SF) wood structure built in the 1940s. It is unheated and is open to the outside. The garage is currently only used for the one vehicle of the current Building 49 resident.	1	<ul style="list-style-type: none"> • Minor staining due to vehicle parking is present on the intact concrete floor. • As documented in the <i>Building 46 Asbestos Abatement</i> of 7 Feb 00, the Navy removed damaged asbestos during Dec 99. The abatement included approximately 3,400 SF of amosite insulation that was within the void space of the walls of the southern bay of the garage. The removed ACMs were handled and transported to an approved, offsite landfill for disposal in accordance with regulations. NFA is required. The <i>PIH Survey</i> of Aug 01 reported that the remaining presumed ACMs are non-friable and no restrictions were identified. • The <i>PIH Survey</i> of Aug 01 reported that small amounts of peeling paint are present in the interior and on the exterior walls; however, no hazards or restrictions were identified.
INST-1	49	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 49 (Transient Housing/VIP Quarters) is a single-level, wood-frame structure consisting of two 2-bedroom units that were used for the high-ranking guests and visitors of the base. The units are currently used by the Navy for the temporary housing of one CSO staff member.	1	<ul style="list-style-type: none"> • Building 49 was formerly heated by No. 2 fuel oil stored in a 550-gal UST (No. 13). The Navy removed the UST and replaced it with a 330-gal, bermed, double-walled AST for No. 2 fuel oil. • The <i>PIH Survey</i> of Aug 01 reported that the presumed ACMs are in good condition; however, 560 cubic feet (CF) of soil in the building's crawlspace contains asbestos debris, which is a hazard for use of the crawlspace. In accordance with DoD policy, the Navy will not abate this asbestos because the crawlspace is not readily accessible. The <i>PIH Survey</i> designated a restriction that, if the crawlspace must be entered, then protective

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
					<p>clothing and respirators are required and that access to the crawlspace should be controlled and the space should be placarded as containing asbestos fibers. Clause 8(d) of enclosure (2) includes a restriction to address this hazard in the crawlspace.</p> <ul style="list-style-type: none"> The <i>PIH</i> Survey of Aug 01 reported that interior paint remains in good condition. A small amount of exterior paint is peeling; however, no hazards or restrictions were identified.
INST-1	--	Yes	The remainder of the INST-1 property not included with the above building descriptions was used as open space (forested).	1	<ul style="list-style-type: none"> No hazardous substances or petroleum products are known to have been released or disposed of on the remainder of the INST-1 property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
ZONING PARCEL 3					
OS-A-1	146	Yes	Construction of Building 146 (New Tower) began in 1993/1994. However, construction was stopped when the base closure was announced. The structure remains incomplete and unused although electrical power is still supplied to the building. A large emergency generator is present next to the building. The remaining property of this subparcel was used as open space.	1	<ul style="list-style-type: none"> No hazardous substances or petroleum products are known to have been released or disposed of on the property. Building 146 has an active, double-walled, 3,000-gal, No. 2 fuel oil Aboveground Storage Tank (AST) that is mostly empty (68 gal remain due to draw down suction limitations). There is no history of spills or releases. The septic system, which connects to a leach field behind the old tower, was unused and has been decommissioned by the Navy. No ACMs and no lead-based paint (LBP) are present due to recent date of construction.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
OS-A-1	--	Yes	The remainder of the OS-A-1 property not included with the above building description was used as open space (forested) along the base perimeter.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
ZONING PARCEL 4					
OS-C-1	24	Yes	Building 24 (Dispensary) is an 11,903 SF, 1-story, wood-framed building constructed between 1943-45. Building 24 was formerly heated by an oil-fired boiler (in Building 98) but currently uses natural gas. Building 24 was used for medical, office, and classroom space until base closure in 1997. Past medical staffing was based out of the Bureau of Medicine Headquarters in Groton, CT. Building 24 included examination/cast rooms for emergency treatments, a laboratory specimen collection room, a photo lab, treatment/examination rooms, and dental labs. The building also has two separate basements (one contained a battery room that provided emergency lighting). Building 24 was unoccupied since base closure in 1997 until 2001 when it was leased to SSTTDC and subleased to the CHARMS (Massapoag) school. CHARMS renovated Building 24	2	<ul style="list-style-type: none"> As summarized in enclosure (5), the Navy has proposed NFA for RIA 43 (Building 24 Fill Pipe). As summarized in enclosure (4), the Navy has mitigated a petroleum release from a former UST behind Building 24 (RTN 3-15379). The RTN was closed with a RAO. The Safety and Health Assessment of Jul 00 documents that no remaining biohazards or waste materials are present (e.g., medical chemicals, sharps containers, used disposable medical products, soiled laundry, or biohazard waste bags). The Navy has previously removed the lead-acid batteries (emergency power) from the battery storage area in the basement. As documented in the <i>Removal Action Report</i> of Jan 99, the Navy has cleaned out residual lead that was on the walls and floors. In Jul-Aug 98, steel shelving and the door were removed (tested and disposed at an offsite facility) and then the walls and floors were pressure washed and rinsed clean. Confirmatory wipe samples of the walls and floor indicated that the cleanup goal of

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
			for use as an educational center for 25 students, ages 13-19, to provide special academic and pre-vocational training.		<p>0.2 mg/SF (lead) had been achieved.</p> <ul style="list-style-type: none"> The <i>PIH</i> Survey of Aug 01 reported that most previously identified ACMs are in fair condition. In small areas, the ACM flooring materials are damaged but are not considered a PIH. No restrictions were identified. The <i>PIH</i> Survey of Aug 01 reported that small amounts of peeling paint are present on the building's ceilings, walls, and floors. A dust wipe sample collected from the first floor did not contain lead above the OSHA threshold concentration of 200 µg/SF. A small amount of the building's exterior paint is peeling. No restrictions were identified. Previously reported PIHs (i.e., paint on the basement stairs, fungal growth in the basement transformer room, ACM in the first floor pump room) were abated during the sublessee's renovations. During Oct 01, the Navy excavated a concrete structure and the surrounding debris (brick, mortar, ash, etc.) in the woods behind Building 24. As documented in the <i>Final Removal Action Report</i>, RIAs 95A, 56, 7A, 36, 55C, 96A, <i>Deluge Tank</i>, and <i>BBQ Pit/Incinerator Area</i> of 23 Jan 02, the results of confirmatory analyses did not exceed applicable soil standards; therefore, NFA is required.
OS-C-1	25	Yes	Building 25 (former Dispensary garage) is approximately 1,500 SF and is a single-story, masonry structure with a concrete slab foundation. The building has two large, roll-	1	<ul style="list-style-type: none"> No hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>Safety and Health Assessment for Buildings 24 and 25</i> of

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
			up overhead garage doors. The building was formerly used to park and to perform maintenance on the Dispensary ambulances. Later, the building was used for office space and to store medical supplies. Currently, the building is unoccupied but some equipment (boxes, computer monitors, office equipment, etc.) remain inside the building.		<p>Jul 00, biohazard materials (as listed in the <i>Phase I EBS</i>) have been removed although warning signs are still posted.</p> <ul style="list-style-type: none"> • The <i>PIH Survey</i> of Aug 01 reported that approximately 4 SF of mold was present on the west wall. • The <i>PIH Survey</i> of Aug 01 reported that ACMs remain in good condition and no restrictions were identified. • The <i>PIH Survey</i> of Aug 01 reported that interior paint remains in good condition. A dust wipe sample collected from the floor did not contain lead above the OSHA threshold concentration of 200 µg/SF. A small amount of the building's exterior paint is peeling. No restrictions were identified.
OS-C-1	52	Yes	Building 52 (High Explosive Magazine) is an unheated, 140 SF underground concrete bunker that was formerly used for the storage of Signal Underwater Sound Bombs. Base maps from 1945 and 1955 list it as a fuse and detonator magazine. Maps from 1970, 1978, and 1993 list it as the high explosive magazine. The building is currently unoccupied, empty, and is surrounded by a chain link fence with a locked gate.	1	<ul style="list-style-type: none"> • As documented in the <i>Phase I EBS</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. • The <i>PIH Survey</i> of Aug 01 reported that the building is in good condition, including the presumed ACM and painted surfaces. No restrictions were identified in the <i>PIH Survey</i>. • The <i>PIH Survey</i> of Aug 01 reported that Building 52 has a painted door that is in good condition. The remainder of the structure is not painted. No hazards or restrictions were identified.
OS-C-1	92	Yes	Building 92 (Magazine-Inert) is an unheated, 1,388 SF concrete block structure that was used to store training bombs and empty casings from small arms. Building 92 has	1	<ul style="list-style-type: none"> • No hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA</i> report of 28 Mar 97, Building 92 was designated as "CERFA 1 clean".

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
			a sealant-covered, concrete floor, and no floor drains. Water and electric utilities have been disconnected.		<ul style="list-style-type: none"> The <i>PIH Survey</i> of Aug 01 reported that ACMS remain in fair condition; however, no hazards or restrictions were identified. The <i>PIH Survey</i> of Aug 01 reported that small amounts of peeling paint are present on the floors. A dust wipe sample from the interior floor did not contain lead above the OSHA threshold concentration of 200 µg/SF. A significant amount of the exterior paint is peeling; however, no hazards or restrictions were identified.
OS-C-1	93	Yes	Building 93 (Magazine-Small Arms) is an unheated 1,388 SF concrete block structure that was used to store small arms ammunition. Building 93 has a sealant-covered concrete floor and no floor drains. Water and electric utilities have been disconnected.	1	<ul style="list-style-type: none"> No hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA Report</i> of 28 Mar 97, Building 93 was designated as "CERFA 1 clean". The <i>PIH Survey</i> of Aug 01 reported that ACMS remain in fair condition; however, no hazards or restrictions were identified. The <i>PIH Survey</i> of Aug 01 reported that interior paint is in good condition. A dust wipe sample from the interior floor did not contain lead above the OSHA threshold concentration of 200 µg/SF. A significant amount of the exterior paint is peeling; however, no hazards or restrictions were identified.
OS-C-1	94	Yes	Building 94 (Magazine-Pyrotechnics) is an unheated, 1,388 SF concrete block structure that was used to store pyrotechnic devices such as smoke grenades, signal flares, decoy flares, and location markers. Building 94	1	<ul style="list-style-type: none"> No hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA report</i> of 28 Mar 97, Building 94 was designated as "CERFA 1 clean". The <i>PIH Survey</i> of Aug 01 reported that ACMS remain in fair condition; however,

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
			has a sealant-covered, concrete floor and no floor drains. Water and electric utilities have been disconnected.		<p>no hazards or restrictions were identified.</p> <ul style="list-style-type: none"> The <i>PIH Survey</i> of Aug 01 reported that significant amounts of peeling paint are present on the floors. A dust wipe sample from the interior floor did not contain lead above the OSHA threshold concentration of 200 µg/SF. A small amount of the exterior paint is peeling; however, no hazards or restrictions were identified.
OS-C-1	98	Yes	<p>Building 98 (former Dispensary Boiler House) is a 195 SF masonry building with a concrete floor that was constructed circa 1943-1945. Since that time, access to Building 98 was controlled by the NAS South Weymouth Public Works Department. Building 98 contains the fuel oil-fired furnace that was formerly used to heat Building 24. No. 2 fuel oil for the boiler was stored in a 2,000-gal UST (No. 10) located between the parking lot and Building 24. In Nov 98, the Navy retrofitted the boiler and connected it to a natural gas line so it can continue to provide heat to Building 24. Building 98 is currently leased to the SSTTDC and subleased to the CHARMS (Massapoag) school.</p>	2	<ul style="list-style-type: none"> As summarized in enclosure (5), the Navy has proposed NFA for RIA 44 (soot in Building 98). As summarized in enclosure (4), the Navy mitigated a petroleum release from the former UST between Buildings 24 and 98 (MCP RTN 3-15379). The Navy filed a Response Action Outcome (RAO) in May 00 and closed the RTN. An AUL was filed to address residual petroleum beneath the foundation of Building 98 [see clause (8) of enclosure (2)]. The <i>PIH Survey</i> of Aug 01 reported ACMs in fair condition; however, no hazards or restrictions were identified. The <i>PIH Survey</i> of Jun 00 reported that lead dust is present on the floor. However, since that time, the lessee of Building 98 has conducted renovations and the revised <i>PIH Survey</i> of Aug 01 reported that a dust wipe sample from the floor did not contain lead above the OSHA threshold concentration of 200 µg/SF. The <i>PIH Survey</i> of Aug 01 reported that significant quantities of peeling paint are present on the walls and floors and the building's exterior paint is in good condition; however, no restrictions/hazards were identified.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
OS-C-1	133	Yes	<p>Building 133 (Main Gate Security) was constructed in 1986 when the main entrance to the NAS was moved from White St. to Main St. Prior to 1986, the parcel was a lightly wooded area. An extension to Building 133 was constructed in 1991/1992, making it 2,556 SF in total. The building has no basement but does have attic space. From 1986-1995, Building 133 was used as the NAS Police Dept Offices. Storage of spent and live small-arms ammunition cartridges, pepper spray, and gun cleaning and maintenance chemicals were stored inside a 3'x3'x3' weapons locker and were removed on or before 30 Sep 97. From 1995 to 1999, the main gate area has been sporadically occupied for use as office space by Navy contractors. The boilers and associated fuel oil UST remain active. Domestic wastewater is connected to the Massachusetts Water Resources Authority (MWRA) system. A FOSL was completed for Building 133 and it is currently subleased to the Weymouth Police Dept.</p>	1	<ul style="list-style-type: none"> • No hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA</i> report of 28 Mar 97, Building 133 was designated as "CERFA 1 clean". • Since 1986, the fuel oil for the boilers at Building 133 has been stored in a 550-gal, fiberglass UST (UST #35) located south of the building. The UST passed tracer tests conducted in 1993, 1994, and 1995 (no more recent tests conducted). The tests were conducted by Tracer Research Corporation under contract number N62472-90-D-1298. The UST meets the 40 CFR 280 requirements of Dec 98. The UST is still active and there is no history of spills or leaks. The flammables lockers noted in the <i>Phase I EBS</i> have been removed. • The <i>PIH</i> Survey of Aug 01 reported that ACMs remain fair condition; however, no hazards or restrictions were identified. The 12-in. by 12-in. vinyl floor tiles in the guards area are beginning to show wear. Fireproof safes, that are presumed to contain ACMs, were reported to be in good condition. • The <i>PIH</i> Survey of Aug 01 reported that interior and exterior paints remain in good condition. A dust wipe sample from the floor did not contain lead above the OSHA threshold concentration of 200 µg/SF. The building was constructed in 1986 (after the ban on LBP in 1978) and is, therefore, unlikely to contain LBP. No restrictions were identified.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
OS-C-1	141	Yes	Building 141 (Housing Referral Office) and the associated parking area are currently leased to the SSTTDC. From 1945-1950s, the area consisted of a dog kennel and caretaker office. These buildings were demolished in the late 1950s. From the late 1950s until 1988, the area was a vacant lot that was used as a training area by the Massachusetts National Guard. Construction of Building 141 for Navy use as the Housing Referral Office commenced in 1988. In 1996, the Local Reuse Authority, currently known as the SSTTDC, moved into the building under a lease agreement. The FOSL for the SSTTDC lease was completed on 30 Sep 99. Building 141 is a 2,827 SF, wood-framed building. An unnumbered, locked shed located next to Building 141 is used for miscellaneous equipment storage (boxes, computer equipment, an air conditioner, etc.).	1	<ul style="list-style-type: none"> • No hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA</i> report of 28 Mar 97, Building 141 was designated as "CERFA 1 clean". • Fuel oil for heating Building 141 is stored in an indoor, 275-gal AST. There is no history of spills or releases from this AST and the AST is in compliance with applicable environmental laws and regulations. • No ACMs and no LBP are present due to the recent date of construction.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
OS-C-1	--	Yes, pending final NFA Decision Documents or NFA regulatory agreements for RIAs 51, 52, and 98	The remainder of the OS-C-1 property not included with the above building descriptions was used as open space (forested) and as the clear zone for the north end of Runway 17-35. A veteran memorial park is located west of Building 141. OS-C-1 also contains most of the North Ballfield located west of Houghton Road.	4, pending completion of work at RIA 52	<ul style="list-style-type: none"> As documented in the <i>CERFA report</i> of 28 Mar 97, the veteran memorial park and Shea Memorial Drive were designated "CERFA 1 clean". As summarized in enclosure (5), the Navy has recommended NFA for RIA 51 (underground asbestos-lined pipe east of Building 141) and will soon issue a final NFA Decision Document. See restriction under clause 8(g) of enclosure (2). As summarized in enclosure (5), the Navy will issue a final NFA Decision Document for RIA 52 (metals cans north of the North Ballfield) prior to the transfer of the property within this RIA. As summarized in enclosure (5), the Navy has completed remediation work at RIA 98 ("Mass 6 Site" located west of Building 141). The Navy, EPA, and MADEP agree that NFA is required. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
OS-C-2	None	Yes	This area contains a small wooded area and a tennis court that is part of the Recreation Complex.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA report</i> of 28 Mar 97, the wooded area behind the tennis courts was designated as "CERFA 1 clean". As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
ZONING PARCEL 5					

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
OS-R-1	None	Yes	This subparcel was used as open space (forested) along the base perimeter.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
OS-R-2	None	Yes	This subparcel was used as open space (forested) along the base perimeter.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
OS-R-3	None	Yes	This subparcel was used as open space (forested) along the base perimeter.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
OS-R-4	None	Yes	This subparcel was used as open space (forested) along the base perimeter.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
OS-R-5	None	Yes, pending final NFA Decision Document for RIA 7A	This subparcel was used as open space (forested) along the base perimeter.	3, pending final NFA Decision Document for RIA 7A	<ul style="list-style-type: none"> As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)]. EBS RIAs 7A and 7B pertain to household debris located along the fenceline of OS-R-5. As summarized in enclosure (5), the Navy completed a final NFA Decision Document for RIA 7B in Jan 02 and a draft NFA Decision Document for RIA 7A in Jul 01. EPA and MADEP have agreed to the NFA decision/recommendation and the Navy will finalize the Decision Document for RIA 7A prior to transfer of that property.
ZONING PARCEL 6					
OS-W-1	32	Yes	The MWR Youth Center is a 1,398 SF, single-story, wood-framed structure built in the 1940s (no basement). This building was used as the guardhouse for the White St entrance until Jul 87 (concrete foundation of the former guard shack is still present adjacent to Building 32). From 1987-1995, the building was used as a youth care center for recreational activities for children ages 6-18. The building was unoccupied from 1995-1999. A FOSL was completed for Building 32 and the associated parking area on 10 Sep 99 and currently the building is used by the CHARMS (Massapoag) school for special-needs teenagers. CHARMS plans to move to Building 24.	1	<ul style="list-style-type: none"> No hazardous substances or petroleum products are known to have been released or disposed on the property. The building was heated with No. 2 fuel oil, which was stored in a bermed 275-gal AST, located to the southeast of the building. The AST was removed on 19 Jun 98 and no signs of spills or staining around the tank were observed. A new, bermed, 275-gal AST was installed after removal of the old AST was completed. Asbestos is presumed to be present in some construction materials of this building; however, no FAD asbestos has been identified. The <i>PIH</i> Survey of Aug 01 reported that ACMs remain in good condition and no restrictions were identified. The <i>PIH</i> Survey of Aug 01 reported that interior paint remains in good condition. Exterior windowsills are beginning to peel. No restrictions were identified.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
OS-W-1	85	Yes	The Pump House contains the water supply booster pumps used to pump water to the water tower as required. The pump is located in a pit beneath the building (confined space), and the valve pit (unnumbered) is in an underground vault approximately 75 ft east of the MWR Youth Center. The Pump House has a concrete floor. Both the Pump House and the vault are locked, and access is controlled by Public Works. The Navy currently maintains the building's interior temperature using a space heater in order to protect the equipment inside. During the <i>Phase I EBS</i> , no records or indications of chemical or fuel storage, disposal or spills were identified.	1	<ul style="list-style-type: none"> • No hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA</i> report of 28 Mar 97, Building 85 was designated as "CERFA 1 clean". • Authorized access by trained personnel only due to a "confined space" condition within the building. No environmental concerns were identified for this building. NFA is required. • The <i>PIH</i> Survey of Aug 01 reported that ACMs remain in fair condition; however, no hazards or restrictions were identified. • The <i>PIH</i> Survey of Aug 01 reported that Building 85 - Interior paint remains in good condition. A moderate amount of the exterior paint is peeling; however, no hazards or restrictions were identified.
OS-W-1	133A	Yes	Building 133A is a small guard shack associated with the Main Gate security (see discussion of Building 133 above). The building is currently unused.	1	<ul style="list-style-type: none"> • No hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA</i> report of 28 Mar 97, Building 133A was designated "CERFA 1 clean". • The <i>PIH</i> Survey of Aug 01 reported that ACMs remain in good condition and no restrictions were identified.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
					<ul style="list-style-type: none"> The <i>PIH Survey</i> of Aug 01 reported that increasing quantities of peeling paint were reported for the building's walls. However, the building was constructed in 1986 (after the ban on LBP in 1978) and is, therefore, unlikely to contain LBP. The exterior paint remains in good condition. No restrictions were identified.
OS-W-1	--	Yes	The remainder of the OS-W-1 property not included with the above building descriptions was used as open space (forested) along the base perimeter.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
OS-W-2	None	Yes	This subparcel was used as open space (forested) along the base perimeter.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
ZONING PARCEL 7					
SPUD-1	97	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 97 (Chapel) is a 5,044 SF, single story, wood-framed building that was moved to its current location between the late 1960s and the early 1970s. The building was built in the late 1930s at Otis Air Force Base located in Bourne, MA (Massachusetts Military Reservation). An	1	<ul style="list-style-type: none"> As documented in the <i>CERFA report</i> of 28 Mar 97, Building 97 and its surrounding grounds were designated "CERFA 1 clean". The Chapel was formerly heated by station steam via steam pipes that entered through the unfinished crawlspace beneath the building. The <i>PIH Survey</i> of Aug 01 identified that the crawlspace contains damaged ACM

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
			annex was built on the westside of the chapel in 1989 and was used as an emergency communications center for the Plymouth Nuclear Power Plant until the mid-1990s. The chapel is currently not used and is in fair condition.		<p>[pipefittings on 2" and 4" fiberglass lines (191 total) and associated asbestos-containing debris (6 SF)]. Therefore, the PIH Survey recommended the restriction that the crawlspace should be placarded as containing asbestos fibers and that the crawlspace should not be entered except by authorized personnel donning protective clothing and respirators. Clause 8 of enclosure (2) includes a restriction to address this hazard. Remaining ACMs were reported to be in fair condition although no additional hazards or restrictions were identified.</p> <ul style="list-style-type: none"> • The <i>PIH Survey</i> of Aug 01 reported that interior paint is in good condition. A dust wipe sample from the floor did not contain lead above the OSHA threshold concentration of 200 µg/SF. A significant amount of the exterior paint is peeling; however, no hazards or restrictions were identified.
SPUD-1	113	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 113 (Field House Head) is a 152 SF concrete block building constructed in 1970 that is unheated and consists of a men's and a women's section. There are no floor drains. This area is part of the leased Recreation Complex.	1	<ul style="list-style-type: none"> • As documented in the <i>CERFA report</i> of 28 Mar 97, Building 113 and its surrounding grounds were designated as "CERFA 1 clean". • The <i>PIH Survey</i> of Aug 01 reported that ACMs remain in good condition and no restrictions were identified. • The <i>PIH Survey</i> of Aug 01 reported that significant quantities of peeling paint are present on the ceilings, walls, and floors. A dust wipe sample from the interior floor indicated that lead dust is present above the OSHA threshold concentration of 200 µg/SF; therefore, the <i>PIH Survey</i> recommends that protective foot coverings be worn inside the building. Respirators are

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
					required for activities that may significantly disturb the lead dust (e.g., renovation), unless the new building owner cleans out the lead dust in accordance with applicable federal, state, and local procedures. Building 113 is currently locked and unused. If Building 113 is reopened for use, then a warning sign about the lead dust must be placed on the entrances to the building unless the dust has been cleaned up. See clause 8(a) of enclosure (2). In accordance with the Navy policy memorandum of 7 Jan 00, the Navy is not required to abate lead dust in Building 113 because it will not be used for residential purposes and will not be a child-occupied facility. The exterior paint of Building 113 is in good condition.
SPUD-1	121	Yes	Building 121 (Recreation Center) is 15,567 SF and was built between 1978 and 1982 in the location of the old Navy Exchange Building that had burned down and was demolished. This area is part of the leased Recreation Complex. The building contains indoor basketball courts, racquetball courts, weight-lifting areas, and locker rooms. There is no basement.	1	<ul style="list-style-type: none"> No hazardous substances or petroleum products are known to have been released or disposed of on the property. The <i>PIH</i> Survey of Aug 01 reported that ACMs remain in fair condition; however, no hazards or restrictions were identified. The <i>PIH</i> Survey of Aug 01 reported that small quantities of peeling paint are present on a duct in the gym area as well as on the floor and a water tank in the boiler room. A dust wipe sample from the floor did not contain lead above the OSHA threshold concentration of 200 µg/SF. Exterior paint is in good condition. No hazards or restrictions were identified.
SPUD-1	122	Yes	The 6,307 SF Building 122 was built between 1978 and 1982 in	1	<ul style="list-style-type: none"> No hazardous substances or petroleum products are known to have been

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
			<p>the location of the previous Navy Exchange Building (NEX), which burned down and was demolished. Building 122 currently contains a seating area and a kitchen. The building formerly contained a six-lane bowling area that was removed in 1997 following base closure. Building 122 is a one-story, masonry structure with a built-up roof. The building steam heating system (previously supplied by the base steam heating distribution system) was converted to natural gas on 9 Nov 98. Building 122 has been used as a conference center since base closure in 1997. Building 122 is currently leased to SSTTDC and subleased to the Massachusetts Criminal Justice Training Council for meetings, office, and classroom use.</p>		<p>released or disposed of on the property.</p> <ul style="list-style-type: none"> • The <i>Phase I EBS</i> of 18 Nov 96 indicated that general purpose cleaners, solvents, lane stripper, shoe solvent, old rags, and spray buff solution for the alley lanes were stored. Public works drawings show a 4 ft by 4 ft by 5 ft drywell in the pin setting room and floor drains in the kitchen and bathrooms of the bowling alley. The drywell is located where the steam and return-water pipes enter Building 122 (similar to other buildings). The drywell is for capturing any water leaks from those pipes and any leaks that occur during maintenance of those pipes. Any water captured discharges to the ground via the gravel base of the drywell. The water in the pipes is from a potable water supply. No floor drains discharge to the drywell (floor drains are connected to the sanitary sewer system) and the drywell was not used for the disposal of hazardous substances or petroleum products. The stored cleaners and solvents for the bowling alley have been removed. • The <i>PIH Survey</i> of Aug 01 reported that ACMs remain in fair condition; however, no hazards or restrictions were identified. • The <i>PIH Survey</i> of Aug 01 reported that interior and exterior paints remain intact and in good condition. A dust wipe sample from the floor did not contain lead above the OSHA threshold concentration of 200 µg/SF. No restrictions were identified.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
SPUD-1	145	Yes	Building 145 (Covered Pavilion) is a 2,642 SF outside picnic area located in a wooded area. It was constructed in 1990. A fire pit here is used for barbecues. This area is part of the leased Recreation Complex.	1	<ul style="list-style-type: none"> • No hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA</i> report of 28 Mar 97, the covered pavilion and its surrounding grounds were designated as "CERFA 1 clean". • No ACMs and no LBP are present due to the recent date of construction.
SPUD-1	--	Yes	The remainder of the SPUD-1 property not included with the above building descriptions was used as recreation space (South Ballfield) or forested open space. The current parking area north of Building 122 was a former NEX gasoline filling station (removed). SPUD-1 contains a small portion of the North Ballfield located west of Houghton Road.	1	<ul style="list-style-type: none"> • No hazardous substances are known to have been released or disposed of on the property. • As summarized in enclosures (4) and (5), the Navy has completed restoration work for EBS RIA 48 (NEX Filling Station UST Leak Detection Failure), EBS RIA 91 (Unreported Incidental Spills/Drips from the Former NEX Filling Station), and MCP RTN 3-13316 (NEX Site). NFA is required. • As documented in the <i>CERFA</i> report of 28 Mar 97, the South Ballfield, the parking area of Buildings 121 and 122, and the grounds between those buildings and Houghton Road were designated as "CERFA 1 clean". • As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
SPUD-2	None	Yes	This subparcel (open field) is the location of the demolished barracks, Building 18. This subparcel is currently part of the Recreation Complex.	1	<ul style="list-style-type: none"> • As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. • As summarized in enclosure (5), the Navy will be completing a final NFA Decision Document for RIA 42 (buried asbestos pipe) in Apr 02 (prior to the

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
					transfer of subparcel SPUD-2).
SPUD-3	None	Yes	This subparcel was used as open space (forested and clear zone east of Runway 8-26).	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
SPUD-4	None	Yes	This subparcel was used as open space (forested).	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
SPUD-5	None	Yes	This subparcel was used as open space (forested and clear zone west of Runway 8-26).	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
SPUD-6	None	Yes	This subparcel was used as open space within the runway triangle. Also includes a portion of the runways.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA report</i> of 28 Mar 97, the runway and taxiway were designated "CERFA-1 clean".
SPUD-7	None	Yes	This subparcel was used as	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS</i>

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
			open space (forested).		<i>Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property.
ZONING PARCEL 8					
SR-R	None	Yes	This subparcel was used as open space (forested) along the base perimeter.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. As noted in the EBST, general surface debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].
ZONING PARCEL 9					
SR-W-1	None	Yes	This subparcel is an open field that is part of the Recreation Complex.	1	<ul style="list-style-type: none"> As documented in the <i>Basewide EBS Phase I Report</i> of 18 Nov 96, no hazardous substances or petroleum products are known to have been released or disposed of on the property. EBS RIA 46 (suspected buried asbestos shingles at Barracks) - As summarized in enclosure (5), only a portion of this RIA is located in the subparcel. NFA has been proposed because no hazards were associated with the small amount of debris present (no large subsurface disposals of ACM were found).
SPRUCE STREET EXTENSION					
Spruce Street Extension	None	Yes	This subparcel is separated from the main base by the public road (Spruce Street). This property was obtained by the Navy much later than the rest of the main base. When offered for sale by the former	1	<ul style="list-style-type: none"> No hazardous substances or petroleum products are known to have been released or disposed of on the property. As documented in the <i>CERFA report</i> of 28 Mar 97, this property was designated as "CERFA 1 clean". As noted in the EBST, general surface

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
			owner, the Navy purchased this property in order to increase the amount of clear zone south of Runway 17-35. Upon obtaining the land, the Navy removed the vegetation and a small residential home therein. The property is currently overgrown and remains unused other than a 30-ft wide utility easement for the Brockton Edison Company.		debris (solid waste) in this subparcel is being addressed separately from the FOST [see also enclosure (7)].

TABLE 2 HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS STORED, RELEASED, OR DISPOSED

Subparcel (1)	Building Number	Description	Substance Stored, Released, or Disposed	Quantity (gallons)	Date(s) Stored, Released, or Disposed	CERCLA 120(h)(1) Reportable? (2)
INST-1	31	Bachelor Officers Quarters underground storage tank (UST)	No. 2 fuel oil (stored and two reported releases both addressed under the MCP)	Stored 3,000 Releases of approx. 1,700 and 35 gallons (cleaned)	1959 to Aug 97 (removed)	No
INST-1	49	Transient VIP Quarters UST	No. 2 fuel oil (stored)	550	Unknown (removed)	No
INST-1	49	Transient VIP Quarters AST	No. 2 fuel oil (stored)	330	Unknown (present)	No
OS-A-1	146	Building has an inactive, double walled fuel oil above- ground storage tank (AST)	No. 2 fuel oil (stored)	3,000 (currently only 68 gallons)	1996 to present	No
OS-C-1	133	UST No. 35 located south of this building	No. 2 fuel oil (stored)	550	1986 to present	No
OS-C-1	141	Indoor AST	No. 2 fuel oil (stored)	275	1989 to present	No
OS-C-1	24/98	Former UST for Dispensary and associated Boiler House	No. 2 fuel oil (stored and reported release addressed under the MCP)	Stored - 2,000 Released - approx. 50 (cleaned)	UST installed circa 1945 and removed on 12 Aug 97.	No

Subparcel (1)	Building Number	Description	Substance Stored, Released, or Disposed	Quantity (gallons)	Date(s) Stored, Released, or Disposed	CERCLA 120(h)(1) Reportable? (2)
OS-C-1	24	Former Dispensary	Laboratory chemicals (stored)	Unknown	Unknown (removed)	Unknown
			X-ray fixer, developer (stored)	Unknown	Unknown (removed)	No
			Silver Nitrate sticks (stored)	Unknown	Unknown (removed)	Yes
			Hydrogen peroxide (stored)	Unknown	Unknown (removed)	No
			Mild drugs (stored)	Unknown	Unknown (removed)	No
			Wet-cell batteries (stored)	60 batteries	Unknown (removed)	No
			Gasoline (stored in gas cans)	Unknown	Unknown (removed)	No
OS-C-1	25	Garage	Used needles from immunizations (stored in boxes)	Unknown (several boxes)	Unknown (removed)	No
OS-C-1	Flammables locker outside of Building 25	Flammables locker on concrete pad and within fenced area	Benzoin alcohol (stored)	Unknown	Unknown (removed)	No
			Paints (stored)	Unknown	Unknown (removed)	No
			Mineral spirits (stored)	Unknown	Unknown (removed)	No
OS-W-1	32	Bermed AST replacing previous 275- gallon AST	No. 2 fuel oil (stored)	275	First AST removed 19 Jun 98. New AST installed in 1999.	No

Subparcel (1)	Building Number	Description	Substance Stored, Released, or Disposed	Quantity (gallons)	Date(s) Stored, Released, or Disposed	CERCLA 120(h)(1) Reportable? (2)
SPUD-1	122	Conference Center/ Former Bowling Alley	General purpose cleaners (stored)	Unknown	Stored from approx. 1978/1982 to 1997.	Unknown
			Solvents (stored)	Unknown	(see above)	Unknown
			Lane stripper (stored)	Unknown	(see above)	Unknown
			Shoe solvent (stored)	Unknown	(see above)	Unknown
			Spray buff solution (stored)	Unknown	(see above)	Unknown
SPUD-1	South of 102	Navy Exchange (former filling station in current parking lot area)	Gasoline USTs (stored and reported release addressed under the MCP)	6,000	Stored from 1955 to 1997	No
				6,000	Stored from 1955 to 1997	No
				10,000	Stored from 1955 to 1997	No

Note: The hazardous substances, quantities, and dates listed in this notice are based on the available information and documentation.

(1) The subparcel acronyms are defined as follows:

INST = Institutional

OS = Open Space (A = Abington, C = Clear Zone, R = Rockland, W = Weymouth)

SPUD = Special Planned Use District.

(2) Determination made from 40 CFR 302, Table 302.4 "List of Hazardous Substances and Reportable Quantities."

TABLE 3 NOTICE OF CERCLA HAZARDOUS SUBSTANCES

Location (Subparcel)	Substance Stored	CAS Number	Regulatory Synonym	RCRA Hazardous Waste Number	CERCLA Reportable Quantity lbs (kg)	Quantity Stored (kg)	Date(s) Stored
Bldg 24 (OS-C-1)	Silver Nitrate	7761888	NA	NA	1 (0.454)	Unknown	Unknown
Bldg 24 (OS-C-1)	Lab chemicals	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Bldg 122 (SPUD-1)	General purpose cleaners	Unknown	Unknown	Unknown	Unknown	Unknown	Building constructed between 1978-1982. Bowling alley removed after 1997.
Bldg 122 (SPUD-1)	Solvents	Unknown	Unknown	Unknown	Unknown	Unknown	See above Bldg 122
Bldg 122 (SPUD-1)	Lane stripper	Unknown	Unknown	Unknown	Unknown	Unknown	See above Bldg 122
Bldg 122 (SPUD-1)	Shoe solvent	Unknown	Unknown	Unknown	Unknown	Unknown	See above Bldg 122
Bldg 122 (SPUD-1)	Spray buff solution	Unknown	Unknown	Unknown	Unknown	Unknown	See above Bldg 122

NOTES:

The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h).

The hazardous substances, quantities, and dates listed in this notice are based on the available information and documentation (including interviews with employees). This list may not represent all materials stored or used on the property over the period of operation.

NA - Not available.

** - Indicates that no Reportable Quantity is assigned.

**ENVIRONMENTAL COVENANTS,
CONDITIONS, RESERVATIONS, and RESTRICTIONS
ZONING SUBPARCELS B1-W-1, INST-1, OS-A-1, OS-C-1 AND 2, OS-R-1
THROUGH 5, OS-W-1 AND 2, SPUD-1 THROUGH 7, SR-R, SR-W-1, AND SSE
(486.75 TOTAL ACRES),
AT THE FORMER NAVAL AIR STATION,
SOUTH WEYMOUTH, MASSACHUSETTS**

1. Notice of Environmental Condition: Information concerning the environmental condition of Zoning Subparcels B1-W-1, INST-1, OS-A-1, OS-C-1 and 2, OS-R-1 through 5, OS-W-1 and 2, SPUD-1 through 7, SR-R, SR-W-1, and SSE ("the subject subparcels") is contained in the following documents:

(a) *Final Basewide Environmental Baseline Survey (EBS) Phase I* of 18 Nov 96, by Stone & Webster Environmental Technology & Services.

(b) *Final Basewide EBS Phase II Sampling Work Plan* of 13 Oct 98, by Stone and Webster Environmental Technology & Services.

(c) *BRAC Cleanup Plan (BCP)* of Aug 98, by the BRAC Cleanup Team and EA Engineering, Science, and Technology.

(d) *Potential Immediate Hazards (PIH) Survey and Materials Update for Asbestos and Lead-Based Paint (LBP)*, NAS South Weymouth, Massachusetts of Aug 01, by Dewberry & Davis.

(e) *Community Environmental Response Facilitation Act (CERFA) Determination Report*, NAS South Weymouth, Massachusetts of 28 Mar 97, by the Department of the Navy.

(f) *PCB-Free Activity Report*, NAS South Weymouth, Massachusetts of 4 Jan 95.

(g) *Open Space and Recreation Plan*, NAS South Weymouth of Jan 98, by the Daylor Consulting Group for the South-Shore Tri-Town Development Corporation.

(h) *Final Phase II EBS Decision Document for RIAs 42, 46, and 51*, EA Engineering, Science, and Technology of 11 Apr 02.

(i) *No Further Action List, Environmental Baseline Survey, Effective 18 Jan 02*, as signed by the Navy (1 Feb 02), EPA Region I (1 Feb 02) and MADEP (20 Feb 02).

(j) *Federal Facility Agreement for South Weymouth Naval Air Station, National Priorities List Site* of 7 Dec 99 (effective as of 7 Apr 00).

(k) *Response Action Outcome (RAO) and Activity and Use Limitation (AUL) for Billeting (Bachelor) Officers Quarters (BOQ) Site [Massachusetts Contingency Plan (MCP) Release Tracking Numbers (RTNs) 3-10239 and 3-10469]* of 13 Oct 99 by ENSR.

(l) *Final Removal Action Report, RIAs 95A, 56, 7A, 36, 55C, 96A, Deluge Tank, and BBQ Pit/Incinerator Area*, Foster Wheeler Environmental Corporation of 23 Jan 02.

These documents are incorporated herein by reference.

2. Covenant required by Title 42, United States Code at section 9620(h)(3)(B): In accordance with the requirements and limitations contained in *Title 42, United States Code at section 9620(h)(3)(B)*, the GRANTOR hereby warrants that-

(a) all remedial action necessary to protect human health and the environment with respect to any hazardous substances remaining on the subject subparcels has been taken, and

(b) any additional remedial action found to be necessary after delivery of this Quit Claim Deed shall be conducted by the GRANTOR.

3. Reservation of Access by Title 42 United States Code at the section 9620(h)(3)(C):

(a) The Grantor reserves a perpetual easement over and through and a right of access to the subject subparcels to perform any additional environmental inspection, investigation, monitoring, sampling, testing, remedial action, corrective action or other action (hereinafter collectively "Response Actions") that are either (1) required by the United States Environmental Protection Agency ("EPA"); (2) required by the Massachusetts Department of Environmental Protection ("MADEP"); (3) necessary to respond to a claim by Grantee; or (4) necessary for the Grantor to fulfill its environmental responsibilities under applicable law. This easement and right of access shall be binding on the Grantee, its successors and assigns, and shall run with the land. This reservation includes the right to access and use utilities on the subject subparcels at reasonable cost to the United States.

(b) In exercising this right of access, except in case of imminent endangerment to human health or the environment, the Grantor shall give the Grantee, or the then record owner, reasonable prior written notice of Response Actions to be taken in or on the subject subparcels and shall use reasonable means, without significant additional cost to the Grantor, to avoid and/or minimize interference with the use of the subject subparcels.

(c) Subject to the provisions of this Clause 3 (Access) and except as otherwise provided for by applicable law, including, without limitation, Section 330 of the National Defense Authorization Act of 1993, as amended, which rights are expressly reserved by the parties hereunder, the Grantee, the then record owner, and any other person shall have no claim or cause of action against the Grantor or any officer, agent, employee or contractor of the Grantor for interference with the use of the subject subparcels based upon Response Actions taken under this Clause 3 (Access). The Grantor shall not incur liability for any additional Response Action found to be necessary after the date of this conveyance unless the Grantee, its successor or assign, is able to demonstrate that such release or such newly discovered hazardous substance was due to the Grantor's activities, ownership, use or occupation of the Transfer Parcel, or the activities of an officer, agent, employee or contractor of the Grantor.

(d) All subsequent transfer, leases, or other conveyances of the subject subparcels shall be made expressly subject to this easement. Upon a determination by the United States that all remedial action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Federal Facility Agreement (FFA) for the South Weymouth

Naval Air Station (SOWEY NAS) National Priorities List (NPL) site is completed at the SOWEY NAS NPL site, the Grantor shall execute and record a release of easement.

(e) Nothing in any document relating to or affecting the transfer or lease of any of the subject subparcels shall limit or otherwise affect EPA's or MADEP's rights of access and entry to and over any and all portions of the subject subparcels under applicable law for purposes including but not limited to: (1) conducting oversight activities, including but not limited to investigations (such as drillings, test-pitting, borings and data and/or record compilation), sampling, testing, monitoring, verification of data or information submitted to EPA or MADEP, and/or site inspections, in order to monitor the effectiveness of remedial actions, response actions and corrective actions and/or the protectiveness of any remedy which is required by (i) any record of decision ("ROD") (and any amendments thereto) that was approved by the Grantor and EPA and issued by the Grantor pursuant to CERCLA or the SOWEY NAS FFA (and any modifications thereto) before or after the date of conveyance, or (ii) any decision document that was, approved by MADEP and issued by the Grantor under applicable state law before or after the date of conveyance; (2) performing five-year reviews as required by applicable law; and (3) taking response actions.

Enclosure (1) of the FOST includes figures showing site locations and the subject subparcels.

4. GRANTOR Indemnification as required by United States Public Law 102-484 section 330:

(a) Pursuant to Section 330 of P.L. 102-484, as amended, and subject to the provisions contained herein, the GRANTOR shall hold harmless, defend and indemnify, in full, the GRANTEE; and person or entity that acquires ownership or control from the GRANTEE; or any successor, assignee, transferee or lender of the GRANTEE, (collectively and individually "Indemnatee(s)"), from and against any suit, claim, demand, administrative or judicial action, liability, judgement, cost or fee, arising out of any claim for personal injury or property damage (including death, illness, loss or damage to property or economic loss) that results from, or is in any manner predicated upon, the release or threatened release of any hazardous substance, pollutant, contaminant, petroleum or petroleum derivative from or on the subject subparcels, as a result of Department of Defense (DoD) activities at the subject subparcels.

(b) In any case in which the GRANTOR determines that it may be required to indemnify an Indemnatee(s) for any suit, claim, demand, administrative or judicial action, liability, judgement, cost or fee arising out of any claim for personal injury or property damage, the GRANTOR may settle or defend on behalf of that Indemnatee(s), the claim for personal injury or property damage.

(c) If any Indemnatee(s) does not allow the GRANTOR to settle or defend the claim, such Indemnatee(s) will not be afforded indemnification with respect to that claim.

(d) The GRANTOR will not indemnify the Indemnatee(s) unless such Indemnatee(s):

(1) Notifies the GRANTOR in writing within 90 days after such an indemnification claim accrues. If Indemnatee(s) is served with a complaint

or written notice of a claim by federal, state, or local regulators, Indemnatee(s) will provide the GRANTOR with a copy of such document no later than 15 days following service of the complaint. A claim for indemnification accrues when the Indemnatee(s) receives written notice of any suit, claim, demand, administrative or judicial action, liability, judgement, cost or other fee, which relates to personal injury or property damage, that the Indemnatee(s) knows or may be deemed reasonably to have known, may have been caused or contributed to by DoD activities. The Indemnatee(s)' right to indemnification shall not expire due to late notice unless the GRANTOR's ability to defend or to settle is materially and adversely affected;

(2) Furnishes the GRANTOR copies of pertinent papers the Indemnatee(s) receives;

(3) Furnishes, to the extent it is in the possession or control of Indemnatee(s), evidence or proof of any claim, loss, or damage covered herein; and

(4) Provides, upon written request of the GRANTOR, reasonable access to the records and personnel of the Indemnatee(s) for purposes of defending or settling the claim or claims.

(e) The GRANTOR will not indemnify an Indemnatee(s) to the extent such Indemnatee(s) caused or contributed to any release or threatened release of any hazardous substance, pollutant, contaminant, petroleum or petroleum derivative from or on the subject subparcels. The GRANTOR is entitled to contribution from Indemnatee(s) to the extent the GRANTOR shows that such Indemnatee(s) caused or contributed to any release. However, the availability of contribution shall not affect the requirement of the GRANTOR to defend an Indemnatee(s), unless such Indemnatee(s) is solely responsible for the release or threatened release giving rise to the claim for indemnity, in which case the GRANTOR's duty to defend will not exist as to that claim.

(f) For purposes contained herein, the following terms have the meanings indicated below:

(1) "release," "threatened release," "hazardous substance," "pollutant," "contaminant," "removal," "remedial action," and "response" have the meanings given such terms under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC 9601 *et seq.*) and U.S. Environmental Protection Agency (EPA) regulations implementing CERCLA.

(2) "DoD activities" means the DoD's construction, installation, placement, operation, maintenance, use, misuse, abandonment of or failure to maintain the buildings and equipment and land at the subject subparcels; or failure to satisfy any otherwise legally applicable obligation to investigate or remediate any environmental conditions existing at the subject subparcels. "DoD activities" does not mean the release or threatened release is caused or contributed to by the Indemnatee(s).

(3) "Action...arising out of any claim for property damage" includes, but is not limited to, any judicial, administrative or private cost recovery proceeding brought against an Indemnatee(s) (a) for response costs arising under CERCLA, (b) for costs incurred to enjoin or abate the presence or migration of contamination from or on the subject subparcels under the Resource Conservation and Recovery Act (RCRA) (42 USC 6901 *et seq.*), or (c) for costs incurred to comply with the requirements of similar federal or

state laws and regulations (or the laws of any political subdivision of the state) which arise from environmental conditions at the subject subparcels.

(4) "Environmental condition(s)" means any hazardous substance, pollutant or contaminant, including hazardous waste or hazardous constituent, petroleum or petroleum derivative disposed of, released or existing in environmental media such as soil, subsurface soil, air, groundwater, surface water, or subsurface geological formations at concentrations above background levels.

(5) A release or threatened release which an Indemnitee "caused or contributed to" excludes actions by an Indemnitee that uncover environmental conditions arising from DoD activities, including but not limited to testing of the subject subparcels, the excavation of soil, and the demolition of structures, and efforts to properly address an environmental condition arising from DoD activities; provided, however, that (a) the Indemnitee's actions are in accordance with applicable federal, state, and local laws, (b) the Indemnitee's notifies the GRANTOR in accordance with the notification provisions contained herein, and (c) the Indemnitee's actions are not negligent.

5. Presence of Lead-Based Paint (LBP): The GRANTEE covenants and agrees, on behalf of itself, its successors and assigns, that it will comply with all federal, state, and local laws relating to LBP in its use and occupancy of the subject subparcels (including demolition and disposal of existing improvements). The GRANTEE shall hold harmless and indemnify the GRANTOR from and against any and all loss, judgement, claims, demands, expenses, or damages of whatever nature or kind which might arise or be made against the GRANTOR as a result of LBP having been present on the subject subparcels herein described. Improvements on the subject subparcels were constructed prior to 1978 and, as with all such improvements, a LBP hazard may be present. In Aug 01, the Navy completed the update of the *Potential Immediate Hazards (PIH) Survey and Materials Update for Asbestos and LBP at NAS South Weymouth, Massachusetts*.

6. Presence of Asbestos: The GRANTEE, its successors and assigns, are hereby warned and do acknowledge that certain portions of the improvements on the subparcels subject to this Quit Claim Deed are thought to contain asbestos-containing materials (ACMs). The GRANTEE, by acceptance of this Quit Claim Deed, covenants and agrees, for itself, its successors and assigns, that in its use and occupancy of the subject subparcels (including demolition and disposal of existing improvements) it will comply with all federal, state, and local laws relating to asbestos and that the GRANTOR assumes no liability for damages for personal injury, illness, disability or death to the GRANTEE, or to GRANTEE's successors, assigns, employees, invitees, or any other person, including members of the general public, arising from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with asbestos on the subject subparcels, whether the GRANTEE, its successors or assigns, has properly warned or failed to properly warn the individual(s) injured. Section 101-47.304-13 of the Federal Property Management Regulations, made a part hereof, contains complete warnings and responsibilities relating to ACMs.

7. Presence of Historic Fill Material: The GRANTEE, its successors and assigns are hereby warned and do acknowledge that certain portions of the subparcels subject to this Quit Claim Deed are underlain by fill material

resulting from the historic development of the NAS South Weymouth. The fill material may contain rocks, boulders, and other non-hazardous debris such as ash (generated from controlled burn/vegetation reduction during land clearing operations) asphalt, brick, and/or concrete materials. The GRANTEE, by acceptance of this Quit Claim Deed, covenants and agrees, for itself, its successors and assigns, that in its use and occupancy of the subject subparcels, including excavations, will comply with all federal, state, and local laws relating to the constituents of the historic fill material and that the GRANTOR assumes no liability for damages for personal injury, illness, disability or death to the GRANTEE, or to GRANTEE'S successors, assigns, employees, invitees, or any other person, including members of the general public, arising from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with the historic fill material on the subject subparcels, whether the GRANTEE, its successors or assigns, has properly warned or failed to properly warn the individual(s) injured.

8. Miscellaneous Site Specific Clauses:

(a) As documented in the *PIH Survey* of Jun 00, lead dust has been identified on the floor of Building 113 and the floor of the kitchen and basement of Building 31. The update of the *PIH Survey* in Aug 01 also reported the presence of lead dust in Building 113 but did not detect elevated lead concentrations in a dust wipe sample from the floor of Building 31. However, it is unclear whether the samples in Building 31 were collected at the same location; therefore, this clause still applies to both buildings. Because Buildings 31 and 113 will not be used for residential purposes, NFA is required by the Navy to address lead dust. However, protective footwear is recommended inside Building 113 and the affected areas of Building 31, and respirators are required for any activities that may significantly disturb the lead dust (e.g., renovation workers). This requirement can be waived if the Grantee (or its successors) cleans up the lead dust in accordance with federal, state, and local requirements for the safety of workers and other personnel entering the building. Buildings 31 and 113 are currently locked and unused. If the buildings are reopened for use, and the lead dust is not cleaned up, then the Grantee (or its successors) must place warning signs on the entrances to the buildings that indicate the presence of lead dust.

(b) In accordance with the MCP (310 CMR 40.0000), an AUL has been implemented for petroleum-impacted soil in an area of 204 +/- sf beneath Building 98 [see Figure 6 in enclosure (1) of the FOST]. The AUL Opinion provides that a condition of No Significant Risk to health, safety, public welfare, or the environment exists for any foreseeable period of time so long as any of the following activities and uses occur on the Portion of the Property:

- (i) Activities and uses consistent with residential, commercial, and/or industrial activities so long as they do not involve the disturbance of the boiler building foundation that would render the soils underlying the building from a depth of 3 to 15 ft below ground surface (bgs) accessible to anyone who may access the AUL area.
- (ii) If the boiler building is removed, soil beneath the boiler building footprint from a depth of 3 to 15 ft bgs must not be disturbed and immediately following the removal of the building, the former footprint of the building must be replaced with another impervious surface such as another building slab or pavement such as the soils beneath the former building footprint

from 3 to 15 ft bgs remain inaccessible to those who may access the AUL area.

- (iii) Excavation activities in soils under the footprint of the boiler building provided that soils are managed under a Soil Management Plan prepared under the supervision of a Licensed Site Professional (LSP).
- (iv) Such other activities or uses which, in the Opinion of a LSP, shall present no greater risk of harm to health, safety, public welfare or the environment than activities and uses set forth in this paragraph.
- (v) Such other activities or uses not identified below as being Activities and Uses Inconsistent with the AUL.

Activities and Uses inconsistent with the objectives of the AUL and which, if implemented within the AUL area, may result in a significant risk of harm to health, safety, public welfare or the environment or in a substantial hazard are as follows:

- (i) Changes or destruction of the floor or foundation of the boiler building which would render the soil beneath the boiler building from a depth of 3 to 15 ft bgs accessible (except as described above for supervised excavation or foundation replacement).

Obligation and/or conditions to be undertaken and/or maintained at the AUL area to maintain a condition of No Significant Risk as set forth in the AUL Opinion shall include the following:

- (i) The boiler building's foundation within the AUL area shall be maintained in good repair so as to render the underlying soil at a depth of 3 to 15 ft bgs inaccessible.
- (ii) If excavation of soil within the AUL area beneath the boiler building footprint is to occur, any potentially contaminated soil and debris removed from the excavation must be managed in accordance with a Soil Management Plan and Health and Safety Plan prepared under the supervision of an LSP. At a minimum, the Soil Management Plan must (a) detail the procedures for preventing the inaccessible soils from being otherwise utilized in a manner that would result in their use as surface or subsurface soils; (b) include an exposure assessment to identify the need for personal protective measures; (c) describe the stockpile storage methods to be utilized in order to prevent accidental exposure to the excavated soils; and (d) contain procedures that will be utilized to limit access to the excavation soils and the excavation area by site workers and others (i.e., residents, abutters, children, or accidental trespassers) not covered by the Soil Management Plan.

Any proposed changes in activities and uses within the AUL area which may result in higher levels of exposure to oil and/or hazardous material than currently exist shall be evaluated by a LSP who shall render an opinion in accordance with 310 CMR 40.1080 et seq. As to whether the proposed changes will present a significant risk of harm to health, safety, public welfare or the environment. Any and all requirements set forth in the Opinion to meet the objective of the AUL shall be satisfied before any such activity or use is commenced.

(c) In accordance with the MCP (310 CMR 40.0000), an AUL has been implemented for residual petroleum-impacted soil in an area of 7,269 +/- sf beneath a portion of the Building 31 foundation [see Figure 4 in enclosure (1) of the FOST]. The AUL does not prevent future redevelopment of the property; however, it does impose requirements for soil management if a reuse option would potentially disturb residual petroleum-impacted soil

beneath the building foundation. The AUL Opinion provides that a condition of No Significant Risk to health, safety, public welfare, or the environment exists for any foreseeable period of time so long as any of the following activities and uses occur on the Portion of the Property:

- (i) Activities and uses consistent with the residential, commercial, and/or industrial activities which do not involve the disturbance of soil beneath the building foundation at depths greater than 7 ft bgs which would render the underlying soil accessible;
- (ii) Utility work or other construction activity which could involve excavation of soil at depths of less than 7 ft.
- (iii) Excavation of soil from depths greater than 7 ft with a soil management plan designed to reduce public access to soil and, on completion of excavation activities, to cover excavated subsurface soil (soil at a depth of greater than 7 ft bgs) with at least 7 ft of soil which originated from depths of less than 7 ft or clean fill.
- (iv) Such other activities or uses which, in the Opinion of a LSP, shall present no greater risk of harm to health, safety, public welfare, or the environment.

The following activities and uses are inconsistent with the objectives of the AUL for Building 31 and may result in a significant risk of harm to health, safety, public welfare, or the environment or in a substantial hazard:

- (i) Changes to, or destruction of, the floors or foundations of the building which would render underlying soil accessible (except as described below or supervised excavation).
- (ii) Excavation of soil from beneath the building footprint at depths greater than 7 ft, unless it is performed under the supervision of individuals who are qualified to manage impacted soil in accordance with applicable regulations and policies that may be in effect, so as to limit human exposure potential.

Obligations and/or conditions to be undertaken and/or maintained within the AUL area to maintain a condition of No Significant Risk shall include the following:

- (i) The building's foundation within the AUL shall be maintained in good repair so as to render the underlying soil inaccessible.
- (ii) If excavation of soil within the AUL beneath the building footprint at depths greater than 7 ft is to occur, any potential contaminated soil and debris removed from the excavation will be managed in accordance with soil management and health and safety plans prepared by a qualified individual who has reviewed the project file and will follow applicable regulations and guidelines that may be in effect, so as to limit human exposure potential.

Any proposed changes in activities and uses within the AUL area which may result in higher levels of exposure to oil and/or hazardous material than currently exist shall be evaluated by an LSP who shall render an Opinion in accordance with 310 CMR 40.1080 et seq. As to whether the proposed changes will present a significant risk of harm to health, safety, public welfare or the environment. Any and all requirements set forth in the Opinion to meet the objective of the AUL shall be satisfied before any such activity or use is commenced.

(d) Due to the presence of damaged ACMs, access to the crawlspaces of Building 49 (Transient VIP Housing) and Building 97 (Chapel) shall be restricted to authorized and trained personnel wearing protective clothing and respirators. This restriction can be waived provided that the identified

damaged ACMs are properly abated and disposed of in accordance with federal, state, and local asbestos regulations.

(e) Access to Building 98 (former Boiler House), the two basements of Building 24 (former Dispensary), and the first floor pump room of Building 24 shall be restricted (warning signs and locked doors) to maintenance workers or other authorized personnel, as designated by the Grantee. This restriction can be waived provided the recently completed or future renovations satisfactorily mitigate the relevant concerns in the basements and first floor pump room, as outlined in enclosure (1).

(f) Due to the indoor air hazard (fungal growth and spores) and excessive mold growth identified in the basement of Building 31 (BOQ), users of Building 31 shall don protective clothing and respirators when inside the building. This requirement can be waived if the Grantee abates the mold and fungus-related indoor air hazard.

(g) Due to the presence of subsurface infrastructure that may contain asbestos (e.g., asbestos-lined pipes), the Grantee shall not conduct excavation in such areas (e.g., EBS RIA 42, EBS RIA 51, or as indicated by utility maps provided by the Navy) except in accordance with an approved Health and Safety Plan or under the supervision of trained personnel using proper Personal Protective Equipment and procedures in accordance with local, state, and federal regulations.

(h) The Grantee shall assess any potential LBP hazards for buildings, which are to be reused for residential purposes, or for purposes that include the presence of children under the age of 6 years. Any required abatement or engineering controls shall be completed by the Grantee in accordance with applicable federal, state, and local regulations.

(i) So long as the Navy is conducting environmental investigations in other areas at NAS South Weymouth, the Grantee shall notify the Navy regarding any planned installation of a groundwater extraction well(s) within any of the FOST subparcels.

(j) A 500 ft radius clear zone (safety easement) surrounding the Federal Aviation Administration's (FAA's) Terminal Doppler Weather Radar (TDWR) on the East Mat south of Subparcel OS-W-2 shall be maintained at the elevation of the top landing of the tower and above (75 ft above ground level).

(k) A 2,000 ft radius clear zone (operational easement) shall be maintained at the elevation of the top landing of the tower and above (75 ft above ground level). This clear zone shall be between the true bearing of 225° proceeding in a north arc through 000°, maintaining a 2,000 ft radius, to 045° True, from the TDWR antenna. The TDWR Antenna location is 42° 09.

END

**SUMMARY OF INSTALLATION RESTORATION (IR) PROGRAM SITES AT THE
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

Note: This is a list of all the Federal IR Program Sites being addressed at the former NAS South Weymouth. This summary table indicates whether any of these areas have potential impacts to or restrictions for the subparcels included in this Finding of Suitability to Transfer (FOST). None of these IR Program sites are contained within the FOST subparcels.

IR Program Site	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
1	Westgate Landfill	1,230 ft north of SPUD-5	Past disposal of domestic and potentially other wastes from the base.	Ongoing Phase II Remedial Investigation (RI) and Feasibility Study (FS).	None identified.	None. Warning signs are in-place to discourage tres- passing.	Draft Final Phase II RI of 17 Feb 01 and Draft FS of 19 Mar 01.
2	Rubble Disposal Area	25 ft south of SPUD-3	Past disposal of building debris.	Completed Phase II RI. No elevated concentrations in groundwater. Ongoing FS to address the buried debris as well as PCBs detected in soil.	None identified. Localized debris and impacts to soil.	None. Warning signs are in-place to discourage tres- passing.	Final Phase II RI of 15 Dec 00 and Draft FS of 15 Dec 00.

IR Program Site	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
3	Small Landfill	50 ft northwest of SPUD-4 and 65 ft southeast of OS-R-2	Past disposal of concrete rubble and tree stumps.	Completed Phase II RI and Proposed Plan. No identified unacceptable risks to human health or the environment in soil or groundwater from chemicals of concern associated with the Small Landfill. Planning No Further Action (NFA) with groundwater monitoring. Monitoring is included to verify that the one detected concentration of thallium in groundwater (associated with a slight potential non-cancer human health risk) is not associated with the site. The site may still need to be closed under the State's solid waste landfill program.	None identified. No CERCLA risks from concentrations associated with the landfill.	None. Warning signs are in-place to discourage trespassing until property is transferred.	Final Proposed Plan of Apr 01.
4	Fire Fighting Training Area	210 ft north of SPUD-6	Past burning and extinguishing of waste oils and fuels.	Completed Phase II RI. No unacceptable risks to human health or the environment were found. Pending Proposed Plan.	None identified.	None. Warning signs are in-place to discourage trespassing.	Final Phase II RI of 04 Apr 01.

IR Program Site	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
5	Tile Leach Field	75 ft east of OS-A-1 (located across French Stream)	Past disposal of sanitary sewage from the former Hangar 2 (Building 59) which may have contained petroleum products and/or battery acid waste.	Ongoing Phase II RI.	None identified.	None. Warning signs are in-place to discourage trespassing.	Draft Final Phase II RI Report of 29 Mar 01.
6	Former Fuel Farm	See enclosure (4).	See enclosure (4).	NFA under the Comprehensive Environmental Responsibility, Compensation, and Liability Act (CERCLA) or the Navy's IR Program. Moved to Massachusetts Contingency Plan (MCP) and underground storage tank (UST) programs.	See enclosure (4).	See enclosure (4).	See enclosure (4).
7	Former Sewage Treatment Plant	OS-C-1 is 25 ft away on the upgradient side and 200 ft away on the down-gradient side.	Chemicals may have been disposed of to sewage system.	Ongoing Phase II RI.	None identified.	None. Warning signs are in-place to discourage trespassing.	Draft Final Phase II RI of 9 Mar 01.

IR Program Site	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
8	Abandoned Bladder Tank Fuel Storage Area	450 ft south of OS-C-1	Past storage of AVGAS for hot refueling operations.	Ongoing Phase II RI.	None identified.	None. Warning signs are in-place to discourage trespassing.	Draft Final Phase II RI of 19 Apr 01.
9	Building 81	SPUD-2 is 330 ft away on the upgradient side and SPUD-5 is 3,100 ft away on the down-gradient side.	Former motor pool. Bedrock groundwater impacted with chlorinated solvents. Former RIA-28 and MCP Release Tracking Numbers (RTNs) 3-10628 and 3-11622. Moved to IR Program in Spring 1999.	Navy currently conducting pilot study of In Situ Chemical Oxidation for groundwater. Navy plans to initiate an RI under CERCLA.	None identified.	None. Warning signs and fencing are in-place to prevent trespassing.	Pending pilot study report.
TBD	Hangar 2 (Building 82)	To be determined (may be 300 ft southwest of OS-C-2)	Former MCP RTN 3-18110. Identified chlorinated volatile organic compounds (VOCs) in groundwater above action levels. Floor drains failed.	EPA has nominated this as an Area of Concern (AOC). Currently being addressed under the EBS/VRA program. Navy removed floor drain system (awaiting closure report). Navy plans to initiate a RI under CERCLA.	None identified.	None. Warning signs are in-place to discourage trespassing.	MADEP letter of 7 Apr 00.

**SUMMARY OF MASSACHUSETTS CONTINGENCY PLAN (MCP) SITES AT THE MAIN BASE OF
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

Note: This is a list of all the current and former MCP sites at NAS South Weymouth. This summary table indicates whether any of these areas have potential impacts to or restrictions for the subparcels included in this Finding of Suitability to Transfer (FOST). No active MCP sites are contained within the FOST subparcels.

MCP Release Tracking Number (RTN)	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-10239 (incl. 3-10469)	BOQ (Building 31)	Within subparcel INST-1	Two past fuel oil spills (1,700 and 35 gallons) associated with fuel oil underground storage tank (UST).	Closed [Response Action Outcome (RAO), Activity and Use Limitation (AUL) filed]. A 3,000-gallon UST and approximately 100 cubic yards (CY) of soil were removed in Aug 97. AUL addresses residual petroleum 7 to 9 ft beneath a portion of the building foundation [see clause 8(c) of enclosure (2)]. Soil vapors do not exceed MADEP's risk action levels for indoor air hazards. No groundwater impacts.	None identified	None	AUL of 14 Sep 99. Class A-3 RAO of 13 Oct 99.

MCP Release Tracking Number (RTN)	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-10628 and 3-11622	Building 81	330 ft south (upgradient) of SPUD-2. 3,100 ft north (down- gradient) of SPUD-5.	Former motor pool and UST containing waste oil and waste perchloroethene (PCE). Bedrock groundwater impacted with chlorinated solvents.	No further action (NFA) under the MCP program. The release is being addressed under the Installation Restoration (IR) Program (Site 9). See enclosure (3).	None identified	None	MADEP letter of 30 Mar 99.
3-10739	TACAN Outfall	1,015 ft north of SPUD-6	Potential petroleum release to base stormwater drainage system.	Closed (RAO filed). Investigation found no impact.	None identified	None	Class B-1 RAO of Aug 97.
3-10858	Former Fuel Farm	25 ft west of SPUD-1	Jet fuel and aviation gas releases.	Ongoing Phase IV and RAO activities. Anticipated completion in Dec 01. Tanks and soil removed. Excavation of swale completed. Awaiting additional data review. Additional soil to be removed near east side of the site. Potential AUL.	None identified. Area is fenced and warning signs are in-place. No groundwater hazards from this GW-2/GW-3 area.	None	Pending RAO planned for Dec 01.

MCP Release Tracking Number (RTN)	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-13157	Steam Plant (Building 8)	830 ft south of SPUD-2	No. 6 fuel under southeast portion of building.	Closed (RAO and AUL filed).	None identified	None	Class A-2 RAO and AUL of 15 Sep 00.
3-13316	Navy Exchange (NEX), (Building 102)	Within SPUD-1	Former gasoline filling station.	Closed (RAO filed). Removed the filling pumps, the three USTs, and impacted soil. Soil and groundwater meet MCP standards.	None identified	None	Class A-2 RAO of 15 Jul 98.
3-13673	Shea Memorial Drive spill	Abuts SPUD- 1, SPUD-2, OS-C-1, OS- C-2, SR-W-1, and INST-1	Release of approximately 41 gallons of hydraulic oil from street sweeper on 18 Apr 96.	Closed (RAO filed). Absorbent material used to clean up oil on the same day as the release. Absorbent material was drummed and properly disposed of. No catch basins were affected.	None identified	None	Class A-1 RAO of 14 Jun 96.
3-14180 and 3-15516	Gas Station (Building 116)	700 ft southeast of SPUD-2	Government vehicle fuel station.	Closed (RAO filed). USTs and impacted soil removed.	None identified	None	Class B-1 and A-1 RAOs of 11 Jul 97 and Jul 98.
3-14646	Tanks 9A and 9B (Buildings 11 and 15)	400 ft south of SPUD-2	Release of gasoline.	Closed (RAO filed). USTs and impacted soil removed.	None identified	None	Class A-2 RAO of Oct 97.

MCP Release Tracking Number (RTN)	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-14804	Quarters A	275 ft east of INST-1	Release of No. 2 Fuel Oil.	Closed (RAO filed). UST and impacted soil removed.	None identified	None	Class A-2 RAO of Jan 98.
3-15289	Swimming Pool (Building 105)	40 ft west of OS-W-2	Swimming pool. Impacts from domestic heating oil.	Closed (RAO filed). UST and impacted soil removed in Feb 98.	None identified	None	Class A-2 RAO of Aug 98.
3-15342	Ground Electr. (Building 78)	1,100 ft south of OS-C-1	Release of No. 2 Fuel Oil.	Closed (RAO filed). UST and impacted soil removed.	None identified	None	Class A-2 RAO of Dec 97.
3-15350 and 3-10316	Supply UST (Building 14)	730 ft southeast of SPUD-2	No. 2 fuel oil spill.	Closed (RAO filed). UST and impacted soil removed.	None identified	None	Immediate Response Action (IRA) Completion and Class A-2 RAO of May 98.

MCP Release Tracking Number (RTN)	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-15379	Dispensary (Buildings 24 and 98)	Within OS-C-1	Petroleum- impacted soil beneath Building 98 from No. 2 fuel oil UST (estimated 50 gallon release likely from minor overfills, loose fittings, or weakened seams of the aged tank and fittings).	Closed (RAO and AUL filed). UST and 100 CY of soil were removed on 12 Aug 97. No impacts to groundwater were identified. AUL filed to address residual petroleum beneath Building 98 [see clause 8(b) of enclosure (2)].	None identified	None	IRA Completion and Class A-3 RAO of 3 May 00.
3-15816	Quarters F	280 ft east of INST-1	Release of No. 2 Fuel Oil.	Closed (RAO filed).	None identified	None	Class A-2 RAO of Nov 99.
3-15822	Quarters B	220 ft southeast of OS-W-1	Release of No. 2 Fuel Oil.	Closed (RAO filed).	None identified	None	Class A-1 RAO of Feb 98.
3-15823	Quarters G	280 ft east of INST-1	Release of No. 2 Fuel Oil.	Closed (RAO filed).	None identified	None	Class A-2 RAO of Feb 98.
3-15829	Barracks (Building 115)	100 ft east of SPUD-2	Impacts from domestic heating oil.	Closed (RAO filed). UST removed.	None identified	None	Class A-2 RAO of Feb 98.

MCP Release Tracking Number (RTN)	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-16598E	Jet Fuel Pipeline Site (pipeline)	160 ft west of OS-C-2	Releases from jet fuel pipeline.	Closed (RAO filed). Removed 4,200 ft of pipeline and 1,000 CY of impacted soil from the area. Achieved condition of "No Significant Risk."	None identified	None	IRA Completion Report and Partial RAO of 12 Oct 99.
3-16598W	Jet Fuel Pipeline Site (Holding Tank Area)	1,350 ft south of OS-C-1 and 1,880 ft north of SPUD-5	Releases from holding tank area (Buildings 80 and 100).	Ongoing Phase IV activities (see Oct 01 RAB meeting minutes). Tank and vadose zone soil removed. Further assessment is required for petroleum-impacted groundwater (exceeding GW-1 standards) extending several hundred feet to the southeast. Remedy selection planned for Dec 01. Closeout planned for Dec 02.	None identified	None	Pending.

MCP Release Tracking Number (RTN)	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-17527	Floor Drains, Building 14	675 ft southeast of SPUD-2	Release of petroleum products.	Closed (RAO and AUL filed). AUL addresses residual petroleum in soil beneath the building.	None identified	None	Class A-3 RAO and AUL of 3 Aug 00.
3-18110	Hangar 2 (Building 82)	290 ft southwest of OS-C-2	Identified chlorinated VOC in groundwater above action levels. Floor drains failed.	Likely NFA under the Massachusetts Contingency Plan (MCP). EPA has nominated this as an Area of Concern (AOC). Currently being addressed under the EBS/VRA program. Navy removed floor drain system (awaiting closure report).	None identified	None	MADEP letter of 7 Apr 00.
3-18964	Hangar 1 North Lean-to	1,150 ft south of SPUD-2	Release of hydraulic oil.	Closed (RAO filed). Hydraulic lift and impacted soil removed.	None identified	None	RAM Completion and Class A-2 RAO of 31 Oct 00.

MCP Release Tracking Number (RTN)	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-19064	Aviation Gasoline (AVGAS) USTs, Former Location of Buildings 34, 35, 36 and 37	1,000 ft southwest of SPUD-2	Three former AVGAS USTs.	Proposed closure (draft RAO filed). Phase I Initial Site Investigation and Tier Classification completed on 14 Nov 00. Removed impacted soil in Oct/Nov 00. Pending regulatory concurrence.	None identified	None	Draft RAM Completion /RAO Report of 16 May 01.
3-2621	Basewide NPL	Basewide	General RTN that is part of basewide MCP programs. Not associated with a particular release.	Active until basewide MCP closeout.	None identified	None	Pending.
4-13224	Old Tower (Building 77)	140 ft south of OS-A-1	No. 2 fuel oil release.	Closed (RAO filed). UST and impacted soil removed.	None identified	None	Class A-1 RAO of 8 Dec 97.

**SUMMARY OF ENVIRONMENTAL BASELINE SURVEY (EBS) REVIEW ITEM AREAS (RIAs) FOR THE
FORMER NAVAL AIR STATION (NAS) SOUTH WEYMOUTH, MASSACHUSETTS**

Note: This is a list of all the EBS RIAs being addressed at the former NAS South Weymouth. This summary table indicates whether any of these areas have potential impacts to or restrictions for the subparcels included in this Finding of Suitability to Transfer (FOST). Few of these RIAs are contained within FOST subparcels. Sites within 200 ft of a FOST subparcel are labeled as "adjacent".

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 1A	Runway/ Taxiway Area Optical Lighting System (OLS) vaults	(ADJACENT) 300 ft northeast of OS-R-3 and 140 ft west of SPUD-6	Possible poly-chlorinated biphenyls (PCBs) in two OLS vaults (toward east end of runway 8-26 and toward south end of runway 17-35).	Phase II EBS. PCB equipment has been removed as a Various Removal Action (VRA). Water in vaults was pumped out and sediment was sampled. Only trace PCBs detected (below human health benchmarks). Vaults have been back-filled. Navy prepared No Further Action (NFA) Decision Document.	None identified; PCBs are generally non-mobile in soil or ground water.	None	Final Closeout Report. Draft NFA Decision Document of Dec 01.
RIA 1B	Runway/ Taxiway Area OLS vaults	700 ft east of SPUD-5 and 1,000 ft south of OS-C-1	Possible PCBs in two OLS vaults (toward north end of runway 17-35 and at west end of runway 8-26).	New RIA. Not addressed under Phase II EBS. Navy plans to pump out water and test sediment. Concrete to be tested if staining is apparent.	None identified; PCBs are generally non-mobile in soil or ground water.	None	Pending

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 2A	Runway/ Taxiway Area - East of 8-26	(ADJACENT) 55 ft south of OS-R-1	Potential past releases of petroleum products from aircraft operations.	NFA. No human health or ecological benchmarks were exceeded.	None identified	None	Final NFA Decision Document of 10 Aug 01.
RIA 2B	Runway/ Taxiway Area - North of 17-35	(ADJACENT) 175 ft south of OS-C-1	Potential past releases of petroleum products from aircraft operations.	Ongoing Phase II EBS. NFA is anticipated because no human health or ecological risk-based benchmarks were exceeded by the existing sampling data. Resampled in May/Jun 01. Limited Removal Action (LRA) conducted under the Massachusetts Contingency Plan (MCP) in Jan 02 to address polycyclic aromatic hydrocarbons (PAHs) and lead in soil. NFA anticipated.	None identified	None	Draft Decision Document of 1 Feb 00. Final Work Plan of 6 Feb 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 2C	Runway/ Taxiway Area - Runway Lighting	(ADJACENT) Various locations outside of FOST subparcels	Sparse vegetation between taxiways and runways. Suspected over-use of herbicides.	Ongoing Phase II EBS. Initial herbicide samples exceeded benchmarks. Navy initially recommended Human Health Risk Assessment (HHRA); however, concentrations were consistent with background levels and normal application procedures for herbicides. Additional samples collected in Jan 02 at the request of regulators. NFA anticipated.	None identified	None	Draft Decision Document of 13 Jul 00. Decision Document to be finalized as NFA.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 2D	Runway/ Taxiway Area - South of 17-35	(ADJACENT) Abuts the south end of SPUD-6	Sparse vegetation between taxiways and runways.	Ongoing Phase II EBS. PAHs in groundwater exceeded benchmarks. Navy proposed NFA under EBS. Re-sampled in May/Jun 01 to confirm petroleum data. Additional groundwater sampling required.	None identified	None	Draft Decision Document of 17 Nov 00. Final Work Plan of 6 Feb 01. Decision Document Addendum of Mar 02.
RIA 2E	Runway/ Taxiway Area - West of 8-26	(ADJACENT) 90 ft east of SPUD-5	Potential past releases of petroleum products from aircraft operations.	Ongoing Phase II EBS. Re-sampling data from May/Jun 01 indicate that NFA is likely. Pending revised Decision Document.	None identified	None	Draft Decision Document of 01 Jan 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 3	Suspected TACAN Disposal Area	1,070 ft northwest of SPUD-6	Pile of rubble, soil, and metal debris.	NFA under EBS. Comprehensive Environmental Responsibility, Compensation, and Liability Act (CERCLA) removal action completed in Sep 01. Closeout report pending. Proposed Plan for NFA and Record of Decision (ROD) are anticipated.	None identified	None	Draft Action Memorandum of Jul 01. Draft Decision Document of Apr 01. NFA List effective 18 Jan 02.
RIA 4A	Air Traffic Control (ATC) Area - abandoned septic system	(ADJACENT) 100 ft from OS-A-1	Alleged liquid and solid waste disposal; abandoned septic system; Inactive diesel above-ground storage tank (AST).	Ongoing Phase II EBS. Manganese exceeds groundwater benchmark. Low arsenic in soil. Re-sampled in Aug 01. Navy plans to resample in Spring 2002 and may conduct Removal Action depending on the results.	None identified	None	Draft Decision Document of 17 May 01. Work Plan of 28 Jul 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 4B	ATC Area - Waste disposal	(ADJACENT) 100 ft from OS-A-1	Alleged Liquid and solid waste disposal; abandoned septic system.	Ongoing Phase II EBS. Exceedences of ecological benchmark in sediment and surface water. Re-sampled in Aug 01.	None identified	None	Pending revised Decision Document. Work Plan of 28 Jul 01.
RIA 5	GCA Stand	250 ft east of OS-A-1	Sparse vegetation in and around GCA stand. Cracks in pavement.	Ongoing Phase II EBS. Navy plans to resample to address concerns about former floor drain system and French Stream. Pending work plan.	None identified (RIA 5 and French Stream not included in FOST sub-parcels.)	None	Draft Decision Document of Jul 01.
RIA 6	East Street Gate Sparse Vegetation	(ADJACENT) Abuts OS-R-5	Black dry soil and construction debris near clear zone.	NFA. Samples were consistent with background concentrations and/or did not exceed risk thresholds. Debris no longer present in Oct/Nov 01 site walks.	None identified	None	Final Decision Document of 9 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 7A	Household Debris Near Fenceline North	WITHIN OS-R-5	Potential releases associated with debris.	Proposed NFA. No threats to human health or the environment were identified from samples. The U.S. Environmental Protection Agency (EPA) agrees with NFA. Massachusetts Department of Environmental Protection (MADEP) concurs pending revised Decision Document. Removed drums and cans from soil surface (no VOCs detected during screening).	None identified		Draft Decision Document of Jul 01. Final Removal Action Report of 23 Jan 02. Final Decision Document Of 29 May 02.
RIA 7B	Household Debris Near Fenceline South	WITHIN OS-R-5	Potential releases associated with debris.	NFA. Trace concentrations of mercury (0.2 mg/kg) detected in surface soil did not exceed the human health benchmark (20 mg/kg). Sample concentrations were within background levels.	None identified	None	Final NFA Decision Document of 31 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 8	Wyoming St. Area	(ADJACENT) 100 ft south of OS-R-3	Remnants of Building 70 demolition. Building housed electronics for radar, equipment removed prior to burn.	Ongoing Phase II EBS. Site walkover planned to evaluate adequacy of sample locations. Re-sampled in Aug 01. Pending data evaluation.	None identified	None	Pending Decision Document.
RIA 9A	Building 61	(ADJACENT) 180 ft west of OS-R-3	Final disposition of Building 61 (associated with Building 70).	Ongoing Phase II EBS. NFA is likely based on re-sampling data from May/Jun 01.	None identified	None	Draft Decision Document of Apr 02.
RIA 9B	Building 62	(ADJACENT) 140 ft west of OS-R-3	Final disposition of Building 62 (associated with Building 70).	Ongoing Phase II EBS. Resampled in May/Jun 01. Pending data evaluation.	None identified	None	Pending Decision Document.
RIA 10A	Spills off edge of Hangar 1 apron (on grassy area)	1,450 ft south of SPUD-2	Potential past releases of petroleum products from aircraft operations.	Ongoing Phase II EBS. Recommended additional sampling.	None identified	None	Draft Decision Document of 17 Aug 00. Work Plan of 18 Oct 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 10B	Hangar 1 - Spills on apron	1,500 ft south of SPUD-2	Potential past releases of petroleum products from aircraft operations.	Proposed NFA because human health benchmarks were not exceeded. Revised Decision Document pending revised data.	None identified	None	Draft Decision Document of 1 Feb 00.
RIA 10C	Hangar 1 Lean-tos	1,200 ft south of SPUD-2	Floor drains inside north and south lean-to of Hangar 1.	New RIA. Phase II EBS investigation is pending.	None identified	None	Pending.
RIA 11	Hangar 1 Aqueous Fire Fighting Foam (AFFF)	1,250 ft south of SPUD-2	Inadvertent releases of AFFF into hangar	Proposed NFA because AFFF is non-hazardous. Pending resolution with MADEP.	None identified	None	Phase I EBS of 18 Nov 96; Final Phase II Work Plan Screening Matrix, Table 2-2.
RIA 12	Hangar 1 - Staining between north and south "lean-to" (building extensions)	1,200 ft south of SPUD-2	Staining on cracked asphalt (GSE Area between the North Lean-To and South Lean-to at eastern end of first level)	Ongoing Phase II EBS. Likely NFA. Pending revised Decision Document.	None identified	None	Draft Decision Document of 3 Oct 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 13	Soil along Railroad Tracks near Supply Warehouse	920 ft south of SPUD-2	Stained soil along former railroad loading and unloading area.	NFA. CERCLA removal action done in Sep 01 to address PAHs in soil. Closeout pending final Closeout Report, Proposed Plan, and ROD.	None identified	None	Draft Action Memorandum of Jul 01. Draft Decision Document of Oct 00. NFA List effective 18 Jan 02.
RIA 14	Water Tower	950 ft south of SPUD-2	Staining between Hottensphere and Water Tower. Former drum storage area.	Proposed NFA under EBS. Conducted CERCLA Human Health Risk Assessment (HHRA). RIA 14 to be closed under CERCLA.	None identified	None	Draft Decision Document of 11 Apr 00 (combined with RIA 13). Draft HHRA of 27 Sep 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 15	Water Tower	1,060 ft south of SPUD-2	Possible lead paint in soil (paint chips from sandblasting of tower)	NFA under EBS. Completed Time Critical Removal Action under CERCLA. Additional soil removed in Feb 02. Closeout with Proposed Plan and ROD required.	None identified	None	Removal Action Report of 16 Aug 00. NFA List effective 18 Jan 02.
RIA 16	Sewage Lift Station	990 ft southwest of SPUD-2	Sewage system equalization tank.	Phase II EBS. Navy proposed NFA based on background levels. The Navy removed and sampled the sludge in the tank. Conducted a tightness test of the tank. Tank closed in accordance with regulations.	None identified	None	Draft Decision Document of 24 Aug 00. Pending closure report and revised Decision Document.
RIA 17	Boiler House (Building 8)	830 ft south of SPUD-2	No documentation of cleanup of 550-gallon spill.	NFA. Addressed and closed under MCP Release Tracking No. (RTN) 3-13157. See enclosure (4).	None identified	None	NFA List effective 18 Jan 02.
RIA 18	Boiler House (Building 8)	830 ft south of SPUD-2	Abandoned 15,000-gallon steel tank.	NFA. Addressed and closed under MCP RTN 3-13157. See enclosure (4).	None identified	None	NFA List effective 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 19	Trans- portation Garage (Building 15)	460 ft south of SPUD-2	Abandoned 2,000 gallon underground storage tanks (USTs) No. 9A and 9B filled with sand.	NFA. Addressed and closed under MCP RTN 3-14646. See enclosure (4).	None identified	None	NFA List effective 18 Jan 02.
RIA 20	Trans- portation Garage (Building 15)	470 ft south of SPUD-2	Approximate 20-gallon hydraulic oil spill.	NFA. Spills were managed per Spill Pollutant Containment and Countermeasures (SPCC) Plan.	None identified	None	NFA List effective 18 Jan 02.
RIA 21	Trans- portation Garage (Building 15)	440 ft south of SPUD-2	No record of removal of hydraulic lifts.	Ongoing Phase II EBS. Hydraulic lift pits removed in Aug 92. Navy to assess available data to see if concerns have been addressed under MCP/VRA programs.	None identified	None	Pending work plan.
RIA 22	Vehicle Maintenance (Building 14)	700 ft south of SPUD-2	No vegetation. Rust-colored soil.	NFA. Area was found to be vegetated during the re- inspection.	None identified	None	NFA List effective 18 Jan 02.
RIA 23	Vehicle Maintenance (Building 14)	700 ft south of SPUD-2	Destination of floor drains unknown.	NFA. Addressed and closed under MCP RTN 3-17527. See enclosure (4).	None identified	None	NFA List effective 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 24	Ordnance Shop (Building 50)	(ADJACENT) 30 ft west of OS-C-2	Presence of oil/water separator connected to leach field.	Proposed NFA. VRA completed. Floor drain system piping was removed, pressure washed, and disposed. The oil/water separator manhole was emptied and cleaned. Pipe penetrations were sealed with grout and the manhole was backfilled with clean fill to grade. Analytical data show that arsenic, iron, and manganese are at levels consistent with background conditions. Next step to resolve regulator comments.	None identified	None	Draft Decision Document of 2 Oct 01.
RIA 25	Fuel Tank Farm	(ADJACENT) 25 ft west of SPUD 1 (across roadway)	Oil/water separator.	NFA. Addressed and closed under MCP RTN 3-10858. See enclosure (4).	None identified	None	NFA List effective 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 26	Jet Fuel Separator House	(ADJACENT) 190 ft west of SPUD-1	Floor drain destinations unknown.	NFA. Addressed and closed under MCP RTN 3-10858. Building and soil removal resolved floor drain issue. See enclosure (4).	See enclosure (4).	See enclosure (4).	NFA List effective 18 Jan 02.
RIA 27	Marine Air Reserve Training Building (Building 81)	400 ft south of SPUD-2	Staining on concrete pad.	NFA under EBS. Moved to MCP RTN 3-10628. MCP site transferred to CERCLA (now Installation Restoration [IR] Site 9). See enclosure (3).	See enclosure (3).	See enclosure (3).	NFA List effective 18 Jan 02.
RIA 28	Marine Air Reserve Training Building (Building 81)	325 ft south of SPUD-2	Unplugged floor drain destination unknown.	NFA under EBS. Addressed as MCP RTN 3-10628. Confirmed that floor drains connected to sanitary sewer. MCP site transferred to CERCLA (now IR Site 9). See enclosure (3).	See enclosure (3).	See enclosure (3).	NFA List effective 18 Jan 02.
RIA 29	Wash Rack (Facility 126)	425 ft southeast of SPUD-2	Wash Rack diversion valve was inoperative Maintenance Issue.	NFA. Phase I EBS of 18 Nov 96 determined that the required maintenance (repair) was completed.	None identified	None	NFA List effective 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 30A	Hangar 2 - Spills on apron	560 ft southwest of OS-C-2	Spills on aprons surrounding hangar	Ongoing Phase II EBS. Benzene in groundwater exceeds benchmarks. Future steps under discussion (may be handled under IR Program as Site 10 - see enclosure [3]).	None identified	None	Draft Decision Document of 25 Aug 00.
RIA 30B	Hangar 2 - Spills off edge of apron	(ADJACENT) 100 ft southwest of OS-C-2	Spills on aprons surrounding hangar.	Ongoing Phase II EBS. Cadmium, chromium, and PCBs in soil. PAHs and PCBs in ditch sediment. Included in TACAN outfall CERCLA removal action. Future steps under discussion (may be handled under IR Program as Site 10 - see enclosure [3]).	None identified	None	Draft Decision Document of 7 Mar 00.
RIA 31	Fire Protection Pump House at Fuel Farm	300 ft west of OS-C-2	Acid staining and pitting beneath battery rack.	NFA. Phase I EBS of 18 Nov 96 determined that it was only minor pitting on otherwise good concrete.	None identified	None	NFA List effective 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 32	Non-Potable Water Supply	300 ft west of OS-C-2	400,000-gallon UST used to store water for NAS fire protection system.	Navy sampled to confirm NFA. Pending results.	None identified	None	Phase I EBS of 18 Nov 96.
RIA 33	AIMD Building Shops (Building 117)	725 ft southwest of SPUD-2	Compliance Issue addressed by Base Closure.	Ongoing Phase II EBS/VRA. VRA removed floor drains. Soil and concrete rubble remain on the building floor. Low levels of PAHs, VOCs, and dioxin detected in soil beneath the building. Coal layer remains beneath the building. Further work in associated with RIAs 82 and 88. Work plan in progress.	None identified	None	Draft Decision Document of Nov 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 34	Marine Hot Refueler Area	1,200 ft southwest of SPUD-2	Large area of sparse vegetation.	Proposed NFA because chemicals detected were within background levels. However, Navy may conduct additional groundwater sampling to confirm NFA. Work plan in progress.	None identified	None	Draft Decision Document of 11 Aug 00.
RIA 35	Pistol Range	(ADJACENT) 190 ft west of OS-W-2	Possible lead from small arms ammunition rounds at historic pistol range.	NFA under EBS. Pistol range removal action, testing, and soil removals have been completed. To be closed under CERCLA. Confirmation work may be required. Pending Proposed Plan for NFA and ROD.	None identified	None	Removal Action Closeout Report. NFA List effective 18 Jan 02.
RIA 36	Training Material Storage Bldg. Area	325 ft southwest of OS-W-2	Partially buried drum and metal in a pit west of the pistol range.	Phase II EBS. Planning NFA because only detected trace PCB at benchmark level. Re-sampled in Aug 01 to confirm NFA. Removal of drum and scrap metal (no VOCs detected during screening).	None identified	None	Pending Decision Document. Final Removal Action Report of 23 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 37	Courier Station	920 ft southeast of SPUD-2	Formerly part of East Mat.	Ongoing Phase II EBS. PCBs detected in soil above benchmark. Re-sampled in May/Jun 01; currently evaluating data (NFA anticipated).	None identified	None	Draft Decision Document of 30 Jun 00. Pending revised Decision Document.
RIA 38	Former Location of Buildings 34, 35, 36 and 37	1,000 ft southwest of SPUD-2	Former location of three large partially covered USTs and pump house.	NFA. Addressed and closed under MCP RTN 3-19064. See enclosure (4).	None identified	None	NFA List effective 18 Jan 02.
RIA 39A	East Mat - Non-stained pavement	(ADJACENT) 75 ft south of OS-W-2	Sampled at clean locations as a baseline to compare other East Mat areas.	Navy proposed NFA. Arsenic in subsurface soil exceeded benchmark but not background. Pending revised Decision Document.	None identified	None	Draft Decision Document of 11 Apr 00.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 39B	East Mat - Construction Debris Area	(ADJACENT) 160 ft south of OS-W-2	PAHs in groundwater exceeded Phase II EBS human health risk benchmarks. Elevated chromium and vanadium in soil.	Ongoing Phase II EBS. Further evaluations or action may be required. Pending revised Decision Document.	None identified	None	Draft Decision Document of 11 Apr 00.
RIA 39C	East Mat - Groundwater	(ADJACENT) 200 ft south of OS-W-2	Spills and hazardous waste storage.	Ongoing Phase II EBS. Lead, aluminum, and benzo(a)pyrene in groundwater exceed benchmarks. Navy may propose further sampling or a HHRA. Groundwater appears to flow southeast and southwest from this area (groundwater divide appears to be present).	None identified	None	Draft Decision Document of 11 Apr 00. Revision planned for Apr 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 39D	East Mat - JP-8 AST	380 ft southwest of OS-W-2	Naphthalene was detected in one subsurface soil sample above the human health risk benchmark.	Ongoing Phase II EBS. Navy may conduct additional sampling and a HHRA. Possible LRA.	None identified	None	Draft Decision Document of 11 Apr 00. Revision planned for Apr 02.
RIA 39E	East Mat - Long-Term Storage Area	345 ft south of OS-W-2	Lead, chromium, and arsenic in groundwater exceed Phase II EBS human health benchmarks and background values.	Ongoing Phase II EBS. Navy may conduct additional sampling and a HHRA. Pending revised Decision Document.	None identified	None	Draft Decision Document of 8 Aug 00.
RIA 39F	East Mat - Near Catch Basins	400 ft south of OS-W-2	Arsenic and beryllium in subsurface soil exceed Phase II EBS Human Health Benchmarks and background values.	Ongoing Phase II EBS. Navy may conduct additional sampling and a HHRA. Pending revised Decision Document.	None identified	None	Draft Decision Document of 2 Aug 00.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 39G	East Mat - Stained Pavement	320 ft south of OS-W-2	PAHs in soil exceed Phase II EBS human health and ecological risk benchmarks.	Navy may conduct additional evaluations and a HHRA.	None identified	None	Pending Decision Document.
RIA 39H	East Mat - Material in catch basins	(ADJACENT) 75 ft south of OS-W-2	Sampled catch basins in a pro-active effort to screen the material for disposal.	Material is non-hazardous as per TCLP analysis. Material to be removed as part of catch basin maintenance. NFA after removal (no Decision Document required).	None identified	None	Pending removal documentation.
RIA 40	Aircraft Wash-rack (Facility 226)	1,100 ft southwest of OS-W-2	A 55-gallon drum was labeled "transformer oil."	NFA. Phase I EBS of 18 Nov 96 determined that the manufacturer documents that oil is "PCB-free." Drum was removed.	None identified	None	NFA List effective 18 Jan 02.
RIA 41	Aircraft Wash-rack (Facility 226)	1,430 ft southwest of OS-W-2	Abandoned 6,000-gallon UST.	Proposed NFA. Navy removed UST in 1996 and no release of petroleum was identified. Pending resolution of MADEP comments.	None identified	None	Closeout Report for UST and AST Removals of Mar 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 42	Subsurface asbestos-lined pipes	WITHIN subparcel SPUD-2	Buried asbestos-lined pipes located southwest of Building 20 (transient housing). Building 20 is not within SPUD-2.	NFA. The pipes are inaccessible (no hazard for users of the property). Pipe location was investigated during the <i>Geophysical Investigation</i> of 10 Dec 98. BRAC Cleanup Team (BCT) agrees to leave subsurface utilities in-place.	None identified	No excavation of soil except as approved; see clause 8(g) of enclosure (2).	Final Decision Document for EBS RIAs 42, 46, and 51 of 11 Apr 02. (pending concurrence)
RIA 43	Dispensary Fill Pipe (Building 24)	WITHIN subparcel OS-C-1	An unidentified fill pipe was thought to be connected to a possible abandoned UST.	NFA. Phase I EBS of 18 Nov 96 determined that the remote fill pipe on the east side of the building was determined to be associated with an UST removed on the west side of the building that was addressed under MCP RTN 3-15379 [see enclosure (4)]. The associated piping was removed.	None identified	None	NFA List effective 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 44	Dispensary Building Boiler (Building 98)	WITHIN subparcel OS-C-1	Soot on floor, ceiling, and walls in Building 98 due to boiler.	NFA. Phase I EBS of 18 Nov 96 determined that the malfunctioning boiler was addressed as a maintenance issue (boiler was repaired and the soot was cleaned up).	None identified	None	NFA List effective 18 Jan 02.
RIA 45	BOQ (Building 31)	WITHIN subparcel INST-1	Oil into floor drains.	NFA. Addressed and closed under MCP RTN 3-10469. See enclosure (4).	None identified	None	NFA List effective 18 Jan 02.
RIA 46	Barracks	PARTIALLY WITHIN subparcel SR-W-1	Reported presence of buried pallet of asbestos shingles.	NFA based on geophysical survey and exploratory excavation. No pallet was found; no asbestos shingles are exposed at the surface. Only small, scattered amounts of shingles were found and no large disposal pile. No hazard associated with their presence in the subsurface.	None identified	None	Final Decision Document for EBS RIAs 42, 46, and 51 of 11 Apr 02. (pending concurrence)

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 47	Navy Exchange Filling Station	(ADJACENT) Abuts subparcel SPUD-1	Hydraulic lifts under the floor of Building 102 and oil/water separator.	Navy to propose NFA because the hydraulic lifts were removed as part of a VRA. Ongoing final data evaluations.	None identified	None	Pending Decision Document based on removal closeout report of Nov 01.
RIA 48	Navy Exchange Filling Station	WITHIN subparcel SPUD-1	UST leak detection test failure.	NFA. Addressed and closed under MCP RTN 3-13316. See enclosure (4).	None identified	None	NFA List effective 18 Jan 02.
RIA 49	Swimming Pool	(ADJACENT) 55 ft north of subparcel SR-W-1	Discharge of chlorinated pool water.	NFA. Phase I EBS of 18 Nov 96 determined that this compliance issue was handled with the Massachusetts Water Resources Authority (MWRA).	None identified	None	NFA List effective 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 50	Child Care Center (Building 128)	(ADJACENT) Abuts subparcel OS-W-2	Possible LBP in soil from Hobby Shop's peeling paint.	Proposed NFA during <i>Phase I EBS</i> because lead concentrations did not exceed regulatory standards (<i>Lead Remediation Survey</i> of 97 and <i>Lead in Soil Sample Results</i> of Jun 97.) Recent resolution of regulatory comments. To be added to next EBS NFA list.	None identified	None	Phase I EBS of 18 Nov 96; Final Phase II Work Plan Screening Matrix, Table 2-2.
RIA 51	Housing Referral Office (Building 141)	WITHIN subparcel OS-C-1	Asbestos-lined pipe found during 1995 excavation work for the sewage line connection to a temporary trailer west of Building 141.	NFA. Pipe location was investigated during the <i>Geophysical Investigation</i> of 10 Dec 98. As it was part of the utility infrastructure, the underground pipe was not part of a disposal action and does not pose a known or suspected threat to human health or the environment in its current condition.	None Identified	No excavation of soil except as approved; see clause 8(g) of enclosure (2).	Final Decision Document for EBS RIAs 42, 46, and 51 of 11 Apr 02. (pending concurrence)

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 52	North Ballfield Area	WITHIN subparcel OS-C-1	Unidentified empty metal cans on ground surface.	Ongoing Phase II EBS. Navy initially proposed NFA because no risks were identified from initial samples. Resampled groundwater in Aug 01. Likely NFA.	None identified		Draft Decision Document of 21 Jun 00. Revised Decision Document Addendum issued Mar 02. Final Decision Document of 6 June 02.
RIA 53	Former Radio Transmitter Building Area	(ADJACENT) 50 ft from OS-C-1	Alleged disposal area.	Ongoing Phase II EBS. Metals and PAHs in soil and sediment. Analyte exceedence in surface waters. Ongoing data evaluation. Possible risk assessment or removal action.	None identified	None	Pending Decision Document.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 54	Area South of Trotter Road	1,500 ft south of OS-C-1	Pump house and pipeline.	NFA under EBS. Being addressed under the MCP program (RTN 3-16598). See enclosure (4). Pump house and pipeline have been removed.	None identified	None	NFA List effective 18 Jan 02.
RIA 55A	Area North of Trotter Road - Antenna Field	725 ft southwest of OS-C-1	Antennas and the supporting copper cables.	Ongoing Phase II EBS. Chromium, copper, PAHs, and pesticides in surface soil above benchmarks and background. Resampled in May/Jun 01; currently evaluating data. HHRA and ERA recommended.	None identified	None	Decision Document of Jan 01. Work Plan of Feb 01.
RIA 55B	Area North of Trotter Road - Debris area	(ADJACENT) 190 ft southwest of OS-C-1	Potential releases associated with solid waste disposed over a large, heavily wooded area.	Ongoing Phase II EBS. Antimony, chromium, mercury, and pesticides exceeding benchmarks and background. Resampled in May/Jun 01; currently evaluating data. HHRA and ERA are being prepared.	None identified	None	Draft Decision Document of Jan 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 55C	Area North of Trotter Road - Debris area	(ADJACENT) 70 ft south of OS-C-1	Potential releases associated with solid waste disposed in a heavily wooded area.	Ongoing Phase II EBS. Navy sampled in Aug 01; awaiting data validation.	None identified	None	Pending.
RIA 56	Small Hangar	1,050 ft south of OS-C-1	Discharges to a drywell. The hangar was primarily used for personal planes.	Ongoing Phase II EBS. The Navy may recommend NFA because exceedences of benchmarks are below background. Removal action for two floor drains and piping on 23 Oct 01 (no exceedences in confirmatory samples).	None identified	None	Pending Decision Document (combined with RIA 78D) Final Removal Action Report of 23 Jan 02.
RIA 57	U.S. Coast Guard (USCG) Buoy Depot Facility	1,700 ft south of OS-C-1	Concerns about use of waste oil on USCG facility.	NFA under EBS. Phase II EBS data incorporated into USCG's remedial investigation (RI). Sediment south of facility to be addressed by USCG.	None identified	None	NFA List effective 18 Jan 02. Final USCG RI Report of Feb 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 58	USCG Buoy Depot Facility	1,700 ft south of OS-C-1	Concerns about facility septic system.	NFA under EBS. RIA addressed by USCG's RI under CERCLA; NFA for septic system under RI.	None identified	None	NFA List effective 18 Jan 02. Final USCG RI report of Feb 01.
RIA 59	USCG Buoy Depot Facility	1,700 ft south of OS-C-1	Report of "Haz Waste" container.	NFA under EBS because the report was erroneous (no such container existed). Addressed under USCG's CERCLA RI.	None identified	None	NFA List effective 18 Jan 02. Final USCG RI report of Feb 01.
RIA 60	East Mat Drainage Ditch	(ADJACENT) 75 ft south of OS-W-2	Discolored water and solid waste identified in drainage ditch.	Ongoing Phase II EBS. Detected some analytes above ecological benchmarks. Re-sampled in Jan 00. Navy preparing ERA.	None identified	None	Pending.
RIA 61	TACAN Ditch	950 ft north of SPUD-6	Discolored water in drainage ditch.	Ongoing Phase II EBS. Navy preparing a CERCLA Action Memorandum for removal of PAH and PCB in sediment.	None identified	None	Pending Action Memorandum.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 62	French Stream	(ADJACENT) 20 ft from B1-W-1, OS-A-1, OS-C-1, OS-R-5, SPUD-7, and SSE.	Past releases entered the southern portion of the stream on base property.	To be determined. Navy will be conducting a watershed ecological risk assessment.	None identified. Potential impacts are unlikely to extend beyond the immediate stream area.	None	Pending Decision Document.
RIA 63	Squantum Gardens (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 64	Squantum Gardens (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 65	Squantum Gardens (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 66	Naval Terrace (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 67	Nomans Land Island (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 68	Nomans Land Island (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 69	Nomans Land Island (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 70	Nomans Land Island (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 71	Nomans Land Island (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 72	Nomans Land Island (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 73	Nomans Land Island (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 74	Nomans Land Island (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 75	Nomans Land Island (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 76	Basewide Solid Waste	WITHIN Various areas identified basewide (including in various FOST subparcels)	Areas of solid waste and/or debris.	Proposed NFA under EBS. Individual areas to be addressed on a case-by-case basis as necessary to support property transfers. See enclosure (7). RIA 76A addresses solid waste located within the subparcels of this FOST.	None identified. Solid waste is not a FOST (CERCLA) issue.	None	Phase I EBS of 18 Nov 96 Table 10-3; Final Phase II Work Plan Screening Matrix, Table 2-2.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 77	Basewide USTs - Leak Test not performed	(ADJACENT) Various locations identified basewide (some within 200 ft of FOST subparcels)	Leak Test not performed within past 12 months for UST Nos. 18 (Fuel Farm), 19 (Fuel Farm), 21 (Building 84), 29 (Building 103), 30 (Building 105), 34 (Building 116), and 43 (Building 8). See Table 10-4 of the Phase I EBS of 18 Nov 96.	NFA. USTs addressed under Base Closure Program. Navy has removed all USTs at the Base except at Building 133. Tracer tests performed.	None identified	None	NFA as of 18 Jan 02.
RIA 78A	Basewide USTs - Removal not documented - UST No. 12 at Building 41	550 ft southwest of SPUD-2	UST survey of Mar 97 provided no confirmation of proper closure.	NFA. No analyte exceedences were detected.	None identified	None	Final Decision Document of 9 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 78B	Basewide USTs - Removal not documented - UST #44 at Building 140	550 ft south of SPUD-2	UST survey of Mar 97 provided no confirmation of proper closure.	Navy to propose NFA because sample results are within background levels.	None identified	None	Pending revised Decision Document.
RIA 78C	Basewide USTs - Removal not documented - UST No. 24 at Building 102	(ADJACENT) Abuts SPUD-1	Undocumented removal of UST No. 24 at Building 102.	Ongoing Phase II EBS. Additional groundwater and soil samples collected in Jan 02 to confirm that NFA is required. Pending results.	None identified	None	Pending Decision Document.
RIA 78D	Basewide USTs - Removal not documented - AST near Building 111	1,100 ft south of OS-C-1	Undocumented removal of AST. Tank survey of Mar 97 provided no confirmation of proper closure.	Ongoing Phase II EBS. Navy to recommend NFA.	None identified	None	Pending Decision Document (combined with RIA 56).

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 78E	Basewide USTs - Removal not documented - UST No. 28A and No. 28B near Buildings 110 and 110A	1,300 ft south of OS-C-1	UST survey of Mar 97 provided no confirmation of proper closure.	Conducted sampling and ground-penetrating radar survey. No analyte exceedences were detected. Resampled for methyl-tertiary-butyl-ether (MTBE) in Feb 02.	None identified	None	Pending Decision Document.
RIA 79	Basewide Asbestos	(WITHIN) Various locations basewide	Presence of asbestos-containing materials.	NFA under EBS. Ongoing evaluations and abatements for individual locations as necessary in accordance with Department of Defense (DoD) policy.	See EBST.	See item 8 of enclosure (2).	NFA List effective 18 Jan 02.
RIA 80	Basewide Lead-Based Paint (LBP)	(WITHIN) Various locations basewide	Presence of LBP.	NFA under EBS. Ongoing evaluations and abatements for individual locations as necessary in accordance with DoD policy.	See EBST.	See item 8 of enclosure (2).	NFA List effective 18 Jan 02.
RIA 81	Nomans Land Island (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 82	Power House	850 ft south of SPUD-2	Storage of coal and coal ash.	Ongoing Phase II EBS. PAHs detected above benchmarks in soil. Possible HHRA under CERCLA. Navy may conduct additional sampling along with RIAs 33 and 88.	None identified	None	Draft Decision Document of 22 Mar 00.
RIA 83	Hazardous Waste Storage Area	650 ft south of SPUD-2	RCRA Closure.	Proposed NFA under Phase I EBS. Final <90 Day Hazardous Waste Accumulation Assessment Report (Oct 00) issued to EPA and MADEP for review. Next action to be determined.	None identified	None	Final Phase II Work Plan Screening Matrix, Table 2-2. Final <90 Day Hazardous Waste Accumulation Area Assessment Report of Oct 00.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 84	Area North of Trotter Road	1,100 ft southwest of OS-C-1	Septic system. Exceedences in sediment and surface water.	Ongoing Phase II EBS. Sampled in Aug 01. Pending data evaluation.	None identified	None	Decision Document of 19 Mar 01. Work Plan of 27 Jul 01.
RIA 85	Areas East of Former Runway 8-26	(ADJACENT) Abuts subparcel SPUD-3	Potential second fire fighting training area.	NFA. Phase I EBS of 18 Nov 96 indicated that the Fire Department confirmed that there was no second fire fighting training area.	None identified	None	NFA List effective 18 Jan 02.
RIA 86	Vehicle Maintenance and Gas Island	700 ft southeast of SPUD-2	Potential unreported spill.	NFA. Addressed and closed under MCP RTN 3-15516. See enclosure (4).	None identified	None	NFA List effective 18 Jan 02.
RIA 87	Naval Terrace (not located at the main base; not applicable to this FOST). NFA as of 18 Jan 02.						
RIA 88	AIMD (Building 117)	925 ft south of SPUD-2	Alleged waste oil disposal.	Ongoing Phase II EBS. Completed removal action. Further investigation is required along with RIAs 33 and 82. Work Plan in progress.	None identified	None	Draft Decision Document of 19 Oct 01.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 89	Courier Station	1,025 ft southeast of SPUD-2	Septic system closure.	NFA under EBS. Compliance issue. Navy sampled, pumped out, and backfilled the septic system in Jun 99.	None identified	None	NFA List effective 18 Jan 02. Draft Closeout Report for Septic System of 15 Jul 99.
RIA 90	Transient Housing	(ADJACENT) Abuts SPUD-2	Pipes protruding from ground (located 4 to 6 ft away from the east and west sites of Building 20).	NFA. Phase I EBS of 18 Nov 96 confirmed that the pipes were sewage drainpipes connected to MWRA. Originally connected to cesspool that was removed in 1992.	None identified	None	NFA List effective 18 Jan 02.
RIA 91	Navy Exchange Filling Station	WITHIN subparcel SPUD-1	Unreported, incidental drips/spills from the former filling station.	NFA. Addressed and closed under MCP RTN 3-13316. See enclosure (4).	None identified	None	NFA List effective 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 92	Hobby Shop (Building 95)	(ADJACENT) 15 ft south of OS-W-2	Equipment pit and potential spills	VRA completed inside Building 95 in Jun 98 to remove the hydraulic lifts and Extractable Petroleum Hydrocarbon (EPH)-impacted soil as an MCP Limited Removal Action.	None identified	None	Pending VRA Decision Document.
RIA 93	MADEP Emergency Response spills	Various locations	MADEP Emergency response spills.	NFA under the EBS program because spills were closed out or transferred to the MCP. To be resolved with MADEP.	None identified	None	EBS Phase I Report Errata of 10 Nov 97, Table 5-19.
RIA 94	Area South of Trotter Road	1,450 ft south of OS-C-1	Fuel pipeline.	NFA under EBS. Addressed with RIA 54 under MCP RTN 3-16598. See enclosure (4). Pump house and pipeline have been removed.	None identified	None	NFA List effective 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 95A	Former PCB Transformer (Building 101)	(ADJACENT) 100 ft from SPUD-3	Past PCB storage near drains and drywell.	Ongoing Phase II EBS. Investigation of potential PCB releases through the VRA program. Samples of concrete from the building's floor had no PCBs above benchmarks. In Oct 01, Navy closed floor drain and confirmed that drywell was underneath. Soil samples from drywell did not contain elevated COC concentrations.	None identified	None	Draft Decision Document of 6 Apr 00. Pending floor drain closeout report.
RIA 95B	PCB Storage/Use Building 74	1,350 ft north of SPUD-6	PCB testing recommended by EPA and MADEP.	Phase II EBS and Time-Critical Removal Action completed. Citric acid used to extract PCBs from concrete. Sampling confirmed PCBs successfully removed.	None identified	None	Pending Closeout Report.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 95C	PCB Storage/Use Building 16	260 ft southwest of SPUD-2	Former PCB-containing transformers in basement.	Ongoing Phase II EBS. In Fall 01, the Navy completed a removal action to close the floor drains and document their discharge to the storm water system. Likely NFA pending evaluation of confirmatory samples which were collected.	None identified	None	Pending Closeout Report.
RIA 96A	TACAN - Jet Engine Test Stand NW	1,500 ft north of SPUD-6	Recommended by EPA and MADEP based on experience at other bases.	Ongoing Phase II EBS. Re-sampled in Aug 01; awaiting data validation. Likely NFA. Test pit excavated on 16 Oct 02 identified no stained soil or VOC (screening).	None identified	None	Pending Decision Document. Final Removal Action Report of 23 Jan 02.
RIA 96B	TACAN - Jet Engine Test Stand SE	800 ft north of SPUD-6	Recommended by EPA and MADEP based on experience at other bases.	NFA. Sample results were representative of background conditions.	None identified	None	Final NFA Decision Document of 5 Mar 02. (pending MADEP approval)

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 97	Fire Department spill response records	Various	Past Fire Department Responses.	NFA. Phase I EBS of 18 Nov 96 used this as a temporary RIA number used to track from the Phase I to the Phase II EBS (used to specify sampling at RIAs 2A, 2B, 2D, 2E, 10A, and 30B).	None identified	None	NFA List effective 18 Jan 02.
RIA 98	"Mass 6 Site" (the former Marine Air Control Squadron Facility)	WITHIN subparcel OS-C-1	PCB spill associated with former transformer (when the area was formerly used as training area for the Massachusetts National Guard).	NFA. Phase I EBS of 18 Nov 96 indicated that the transformer had been removed and that confirmatory soil sample results indicated that PCBs remaining in soil (up to 1.8 mg/kg) were below the EPA and the MADEP action levels for industrial land-use (25 and 10 mg/kg, respectively) as well as the MCP Method 1 S-1/GW-1 criterion of 2.0 mg/kg.	None identified	No residential land reuse (non-issue as the area is zoned for open space).	NFA List effective 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 99	Hangar 1 Radio-logical Survey	1,250 ft south of SPUD-2	Radiological survey	Proposed NFA. Navy screened for radium use.	None identified	None	Pending clearance letter from Radio-logical Affairs Support Office (RASO).
RIA 100	East Street Gate Area	300 ft west of OS-R-5	Possible disposal of coal silos and ash.	NFA under EBS; moved to CERCLA program. Various metals and benzo(a)pyrene in surface soil above background and ecological benchmarks. Navy conducted CERCLA removal action in Sep 01. Closure pending Proposed Plan and ROD.	None identified	None	Draft Decision Document of Apr 01. Action Memorandum of Jul 01. NFA List effective 18 Jan 02.
RIA 101	East Street Gate Area	(ADJACENT) 110 ft southwest of SPUD-6	Possible disposal site of former runway lighting.	Ongoing Phase II EBS. Analyte exceedences in sediment. Surface water and sediment re-sampled in Aug 01 to support possible ERA. Pending data evaluation.	None identified	None	Pending Decision Document.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 102	East Street Gate Area	(ADJACENT) 160 ft south of SPUD-6	PCB Transformer.	Proposed NFA during the Phase I EBS. Handled through base closure and the Toxic Substances Control Act (TSCA). To be added to next EBS NFA list.	None identified	None	Final Phase II Work Plan Screening Matrix; EBS Phase I Errata Report of 10 Nov 97.
RIA 103	USCG Buoy Depot Facility	1,700 ft south of OS-C-1	Battery Storage area.	NFA under EBS. Addressed by USCG RI.	None identified	None	NFA List effective 18 Jan 02. Final USCG RI report of Feb 01.
RIA 104	Old Swamp River	(ADJACENT) 170 ft east of OS-R-1; 80 ft east from SPUD-3; 70 ft west of SPUD-4;	Past spills into stream.	To be determined. Navy will be conducting a watershed ecological risk assessment.	None identified. Potential impacts are unlikely to extend beyond immediate stream area.	None	Pending Watershed Evaluation Report.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 105	Runway/ Taxiway Area	(ADJACENT) 100 ft east of SPUD-6	In old aerial photographs, two pads (now gone) are visible near Taxiway C on the east side of the stream (potentially former buildings).	Ongoing Phase II EBS. NFA anticipated based on Mar 02 walk-over and test excavation.	None identified	None	Pending Decision Document.
RIA 106	Fire House (Building 96)	1,150 ft south of SPUD-2	Potential petroleum hydrocarbons and antifreeze in floor drain system	Ongoing Phase II EBS. VRA completed for floor drains in May 00. Confirmatory sample results did not exceed MCP RCS-1 criteria. Likely NFA.	None identified	None	Removal Action Report of Mar 01. Decision Document of Nov 01. Pending final Response to Comments and Decision Document.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 107	Hangar 2 - Spills on apron	275 ft southwest of OS-C-2	Spills on runway apron.	Phase II EBS and VRA. Conducted testing along drain system. Planned to be handled under IR Program Site 10 - see enclosure (3).	See enclosure (3).	See enclosure (3).	See enclosure (3).
RIA 108	Background sample location BG-05	(ADJACENT) Abuts OS-W-2	Sample results exceeding benchmarks at "background" sample location. Location was also found to have been a former Naval Reservist's bivouac site.	New RIA. Phase II EBS investigation is pending. Navy preparing Work Plan.	None identified (only low concentration detected in BG-05 which is over 120 ft from nearest subparcel)	None	Final Summary Report of Background Data Summary Statistics of Feb 00.

EBS RIA	Description	Approximate Distance to Nearest FOST Subparcel	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 109	Background sample location BG-07	(ADJACENT) 120 ft east of OS-R-3	Detections of fuel-related compounds at a "background" sample location. Location was also found to have been near a former gas station (from before the Navy obtained the property).	New RIA. Likely NFA under EBS as it will be addressed under the MCP program. MCP RTN not yet assigned.	None identified; groundwater does not flow into a FOST subparcel	None	Final Summary Report of Background Data Summary Statistics of Feb 00.

**RESPONSIVENESS SUMMARY
ADDRESSING COMMENTS ON THE DRAFT FINDINGS OF
SUITABILITY TO TRANSFER FOR 22 SUBPARCELS
NAVAL AIR STATION
SOUTH WEYMOUTH, MASSACHUSETTS**



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April 2002

RESPONSIVENESS SUMMARY
DRAFT FINDING OF SUITABILITY TO TRANSFER FOR 22 SUBPARCELS
NAVAL AIR STATION SOUTH WEYMOUTH, MASSACHUSETTS

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INTRODUCTION

The following Navy responses pertain to comments that were received on the draft *Finding of Suitability to Transfer (FOST) for 22 Subparcels* of Mar 01. The 22 subparcels are located at the former Naval Air Station (NAS) South Weymouth, Massachusetts. The following comments were received during the public comment period held from 2 Apr 01 to 8 Jun 01 and thereafter (complete copies of the comments are attached at the end of this Responsiveness Summary):

Letter from Dave Wilmot, Abington resident, to Tom Papoulias, Navy Caretaker Site Office (CSO), re: FOST, of 10 May 01.

Letter from Leslie Molyneaux, South Shore Tri-Town Development Corporation (SSTTDC) Advisory Committee, to Tom Papoulias, Navy CSO, re: FOST, of 13 May 01.

Letter from Ken Goff, SSTTDC, to Tom Papoulias, Navy CSO, re: Comments on Draft FOST, of 17 May 01.

Letter from Mary Parsons, Rockland Board of Selectman, to Tom Papoulias, Navy CSO, re: FOST and Environmental Baseline Survey to Transfer (EBST), of 17 May 01.

Mark-ups from Stu Chipman, Restoration Advisory Board (RAB) Member, to Tom Papoulias Navy CSO, re: FOST, of 18 May 01.

Letter from Mary Byram, Hingham resident, to Tom Papoulias, Navy CSO, re: Comments on Draft FOST, of 18 May 01.

Letter from David Labadie, Weymouth resident, to Tom Papoulias, Navy CSO, re: Reuse Plan, of 29 May 01.

Letter from James Geddes, Weymouth resident, to Navy, re: Comments, Questions, and Protests on the FOST, of 29 May 01.

Letter from Dave Wilmot, Abington resident, to Tom Papoulias, Navy CSO, re: Further Comments on FOST, of 23 May 01.

Letter from Donald Cann, Rockland Open Space Committee, to Tom Papoulias, Navy CSO, re: Extension of public comment period, of 31 May 01.

Letter from Beth Sortin, Abington resident, to Captain J.W. Zorica, Navy Engineering Field Activity Northeast (EFANE), re: FOST, of 3 Jun 01.

Letter from Betty Gibbons, Hingham resident, to Tom Papoulias, Navy CSO, re: FOST, of 5 Jun 01.

Letter from Carole Mooney, Rockland Board of Selectman, to Tom Papoulias, Navy CSO, re: Comments on Draft FOST, of 6 Jun 01.

Letter from Mark Primack, The Wildlands Trust of Southeastern Massachusetts, to Tom Papoulias, Navy CSO, re: Conservation Restrictions on Open Space Parcels, of 7 Jun 01.

Letter from Donald Cann, Rockland Open Space Committee, to Tom Papoulias, Navy CSO, re: Comments on Draft FOST, of 7 Jun 01.

Letter from Brian Reid, Plymouth resident, to Tom Papoulias, Navy CSO, re: FOST, of 7 Jun 01.

Email from Mary Byram, Hingham resident, to Tom Papoulias, Navy CSO, re: FOST, of 8 Jun 01.

Letter from Anne Malewicz, Massachusetts Department of Environmental Protection (MADEP), to Michele DiGeambeardino, Navy EFANE, re: Comments on the draft FOST, of 8 Jun 01.

Letter from Dave Wilmot, Abington resident, to Tom Papoulias, Navy CSO, re: Further Comments on FOST, of 11 Jun 01.

Letter from Mary Sanderson, U.S. Environmental Protection Agency (EPA) Region I, to Michele DiGeambeardino, Navy EFANE, re: Review of Draft FOST, of 13 Jun 01.

Letter from Dave Wilmot, Abington resident, to Tom Papoulias, Navy CSO, re: Further comments on FOST, of 13 Jun 01.

Letter from Dave Wilmot, Abington resident, to Tom Papoulias, Navy CSO, re: Further comments on FOST, of 14 Jun 01.

Letter from Kenneth Goff, SSTTDC, to Tom Papoulias, Navy CSO, re: Addendum to previous comments on the FOST, of 3 Jul 01.

Letter from Mary Sanderson, U.S. EPA Region I, to Michele DiGregorio (DiGeambeardino), Navy EFANE, re: Review of Navy's Responsiveness Summary Addressing Comments on Draft FOST for 22 Subparcels of 10 Sep 01.

Letter from Donald Cann, Rockland Open Space Committee, to Tom Papoulias, Navy CSO, re: Additional comments on Draft FOST of 11 Sep 01.

NAVY GENERAL RESPONSES

A large number of comments were received from stakeholders and interested parties, as can be seen from the list of comments in the introduction. In the interest of brevity and clarity, the Navy provides the following general responses to address the most commonly expressed issues. After these general responses, the Navy provides individual responses to regulator and other specific comments.

1. Reuse Plan^{3/4}Several public comments were received regarding the intended reuse of the base property. Many comments indicated that the FOST subparcels could not be considered suitable for a particular reuse until an updated Reuse Plan is prepared. Some comments stated that a major component of the existing Reuse Plan, the Mills Corporation's retail mall, has been cancelled. Some comments also stated that portions of the existing Reuse Plan can not be implemented because some of the areas planned for development are located within newly delineated wetland areas.

Response: The existing Reuse Plan was approved by the local towns and the State in 1998 and is still in effect. Neither the cancelled mall project nor the latest wetland delineation affects the suitability to transfer the FOST subparcels.

The document entitled the *South Weymouth Naval Air Station Reuse Plan and South Shore Tri-Town Development Corporation Enabling Legislation, (Reuse Plan)* was finalized on 27 Jan 98 by the Naval Air Station Planning Committee (NASPC). The NASPC was formed by Executive Order 378 of 1995 by the Governor of Massachusetts and represented local, state, and federal interests in the redevelopment of the base. The Reuse Plan was developed with extensive public participation and was approved by the Towns of Abington, Rockland, and Weymouth, the Massachusetts State Legislature, and the Governor of Massachusetts.

Although the Mills Corporation plan was cancelled, the retail mall was not a contingent part of the Reuse Plan. The *Zoning and Land Use By-Laws for the Naval Air Station South Weymouth* (approved 24 Mar 98 by the towns of Weymouth, Abington, and Rockland) established the zoning designation "Special Planned Use District" (SPUD) that allows for office, research and development, or retail use. The mall project was an allowed reuse under that zoning designation. Although the mall has been cancelled, the SPUD designation stands. The FOST evaluated the property

with respect to the general zoning, not with respect to the specific mall project.

The Navy acknowledges that portions of the *Reuse Plan* may not be implemented in accordance with the zoning based on the results of the recently completed wetlands survey by SSTTDC (e.g., some planned senior housing areas are in what has recently been delineated as wetlands). However, lack of development within a particular zoned area does not affect the suitability to transfer the property.

In accordance with Department of Defense (DoD) policies (e.g., *Fast Track to FOST: A Guide to Determining if Property is Environmentally Suitable to Transfer of Fall 96*), the primary goal of the FOST is to document the conclusion that real property made available through the Base Realignment and Closure (BRAC) process is environmentally suitable for transfer by deed under Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Under CERCLA, potential risks from hazardous substances are evaluated with respect to human health and the environment. The Navy's environmental investigations within the subject subparcels are outlined in the FOST. The Navy finds that the subject subparcels are suitable for transfer for the approved zoning designations. Actual redevelopment of the transferred property is the responsibility of the Local Redevelopment Authority (the SSTTDC).

2. Property Transfer^{3/4}Several public comments stated that the property is currently not ready for transfer or should not be transferred to the SSTTDC.

Response: No actual property transfers to the SSTTDC will take place until after the Navy completes a National Environmental Protection Act (NEPA) Record of Decision (ROD). As outlined in the FOST, the Navy's environmental investigations and restorations within the subject subparcels have either been completed or will soon be completed prior to property transfer. The Navy has the mission and obligation to transfer the NAS South Weymouth property to the local- and State-approved redevelopment agency (i.e., the SSTTDC). By Act of the Massachusetts State Legislature, the SSTTDC has the responsibility to acquire and develop the base property.

The FOST is not a property transfer document. The FOST is one step toward that goal in that it is a technical and administrative determination that the current environmental

conditions within the designated areas (subparcels) pose no hazards to human health or the environment due to the past or present presence/use of CERCLA hazardous substances and are therefore suitable for transfer.

Chapter 301 of the Massachusetts Acts of 1998 authorized the establishment of the SSTTDC for the redevelopment of base property. The Board of Directors for the SSTTDC consists of representatives from Abington, Rockland, and Weymouth. Therefore, the Navy recognizes the SSTTDC as the local- and State-approved recipient of the remaining property at NAS South Weymouth. In accordance with BRAC, the Navy's mission at NAS South Weymouth is to return the base property back to the communities for economic redevelopment and beneficial reuse as soon as possible.

3. Navy and SSTTDC Cooperation^{3/4}Several comments were received regarding the Navy's cooperation with the SSTTDC and the perceived SSTTDC control over the Navy's property.

Response: The Navy is the current property owner for all land at the former NAS South Weymouth except for the approximate 57 acres previously transferred to other federal agencies (e.g., U.S. Coast Guard, U.S. Federal Aviation Administration). The SSTTDC is the local- and state-approved redevelopment authority. In addition, over 110 acres of the Navy's property have already been leased to SSTTDC for various subleased uses (e.g., recreation, police training, etc.) under a Master Lease Agreement. Therefore, cooperation between the Navy and SSTTDC is necessary and appropriate on any other issues that may affect property transfer and redevelopment (e.g., public access, contractor activities). The Navy and SSTTDC have a Joint Management/Access Agreement. A copy of the access policy is available from the Navy CSO (Building 11) and the SSTTDC office (Building 141).

As documented by the 1998 Reuse Plan (Enabling Legislation), the SSTTDC is the local- and State-designated recipient of the remaining base property. In effect, the SSTTDC represents the local communities' interests for the redevelopment of the base. Public concerns over the actions or plans of the SSTTDC should be directed to the SSTTDC. The Navy's mission at the former NAS South Weymouth is to return the property to the local communities in accordance with the approved Reuse Plan.

4. Public Process^{3/4}Several comments were received regarding a perceived lack of public input in the FOST process.

Response: As part of the FOST process, the Navy coordinates with, and gives serious consideration to, regulatory and public input, as evidenced by the lengthy period between issuing the draft FOST (Mar 01) and signing the final version (Apr 02). The interests of the public are represented and protected by multiple means under the FOST process. The EPA and the MADEP represent the public in the sense that it is their role and duty to oversee the Navy's assessments and enforce promulgated federal and state laws and regulations. The SSTTDC, which also provided input on the FOST, represents the public's interest in the redevelopment of the base property. The Navy also held monthly RAB meetings, which are open to all citizens, where issues such as the FOST were discussed among the Navy, regulatory agencies, SSTTDC, and public citizens. The Navy also maintains several public information repositories where recent documents pertaining to environmental investigations at NAS South Weymouth can be reviewed.

The most direct way for the public to provide input on the FOST document was through the public comment period which was initially held from 2 Apr 01 through 2 May 01 and then was extended three times by the Navy to a final date 8 Jun 01 based on public requests. In fact, the Navy has continued to accept public comments on the FOST, even after that date. As documented in this Responsiveness Summary, the Navy has made several modifications to the FOST based on regulatory and public comments.

After all public input has been solicited and evaluated however, the FOST ultimately is a Navy determination of the condition of its own property primarily with respect to the use, storage, or release of CERCLA hazardous substances.

5. Public Access to Property^{3/4} Several comments were received regarding the public's desire to walk the property for a "first-hand" look and/or to allow for independent scientific evaluations of the conditions at the base.

Response^{3/4}The base is still federal property. It is Navy policy to require escorted access to most areas. This is also in accordance with the Navy/SSTTDC Joint Management Agreement (available for review at the Navy CSO, Building 11, and the SSTTDC office, Building 141 on Shea Memorial Drive). Unrestricted access to the base property would potentially present liabilities for visitor safety and for Navy property/facilities/equipment.

Similar to the public, the Navy also provides regular escorted access for the EPA and MADEP personnel that work on base property. The EPA and MADEP directly represent the public's interests on matters of enforcing federal and State environmental laws and regulations. SSTTDC, which was formed with local and state approval, also represents the communities interest in the redevelopment of the property.

With respect to the request for independent scientific evaluations, it should be noted that the Navy's environmental investigations at NAS South Weymouth are open to public review. At this time, the former NAS South Weymouth is listed on the National Priorities List (NPL) and the Massachusetts Contingency Plan (MCP); therefore, the Navy must focus its resources on completing its environmental investigations under the regulatory supervision of the EPA and MADEP. The Navy's environmental investigations are conducted by environmental professionals and experts. The EPA's and MADEP's experts provide careful scrutiny of the Navy's procedures, actions, and conclusions at the environmental sites. The SSTTDC is also conducting its own investigations in support of the redevelopment plan (e.g., wetlands delineation, aquifer tests, vernal pool identification). Any comments about the SSTTDC's work can be directed to SSTTDC.

However, the Navy has conducted several, and continues to offer to the public, guided tours of any areas of concern on the base. The enclosures to the FOST Memorandum summarize the necessary information the Navy is using to evaluate whether its property subparcels are suitable for transfer with respect to CERCLA. The referenced investigation reports are available for public review at the Navy CSO and at the Information Repositories at the Abington, Hingham, Rockland, and Weymouth libraries.

Furthermore, the Navy has recently completed supplemental visual site inspections of the FOST subparcels with MADEP and EPA personnel. The basewide property was previously evaluated during the Phase I Environmental Baseline Survey (EBS) during which the EPA and MADEP participated in multiple inspections of the Navy property and operations. The purpose of the recent site walks was to provide a current visual inspection and confirmation of previous observations. MADEP and EPA comments from these site walks are included in this Responsiveness Summary along with their comments on the FOST document. The site walks

covered the subparcels using 100 ft transects during the months of Nov 00 through May 01. As a result of the recent site walks, the locations of various solid waste areas have been recorded and some areas are being re-evaluated for possible further investigations.

6. Solid Waste^{3/4}Several comments were received questioning the types and extent of solid waste debris present in various locations across the base. Most comments indicated that the debris should be removed by the Navy prior to any property transfer in order to protect the environment, for safety reasons, or for housekeeping reasons. It was also requested that the Navy clarify their solid waste program for NAS South Weymouth.

Response^{3/4}As stated in DoD BRAC guidance (*Fast Track to FOST* of Fall 96), the FOST is a determination that the subject property is environmentally suitable for transfer by deed under Section 120(h) of CERCLA. CERCLA Section 120(h) requires that notice be given, both in deed and contracts for sale, of the storage, release, or disposal of hazardous substances. As such, the FOST documents that the subject property is suitable for transfer because (1) no hazardous substances are known to have been released or disposed of on the property or (2) the requirements of CERCLA Section 120(h)(3) have been met for the property.

Solid waste is not regulated under CERCLA Section 120(h). DoD BRAC guidance for FOSTs states that, in some cases, it may be required that certain hazards not regulated under CERCLA be disclosed, according to the policies of the particular DoD component (i.e., Navy), and that restrictions on use related to those hazards be stated in the deed of transfer. Such disclosures and restrictions should be described in the FOST. Non-CERCLA hazards can include issues such as solid waste, petroleum products, and safety concerns.

Therefore, the presence of solid waste in the subject subparcels does not preclude the FOST provided that notification and any necessary restrictions are included in the FOST document. The FOST document has been modified to expand on and clarify the descriptions and locations of solid waste in the subject subparcels.

Separately from the FOST, the Navy has coordinated with the State solid waste management officials (via MADEP) and the redevelopment authority (i.e., the SSTTDC) regarding the

status of the solid waste debris areas with respect to the pending property transfer.

The Navy's solid waste program at NAS South Weymouth consists of the following steps: (1) develop an inventory of debris areas and (2) evaluate each area on a case-by-case basis and conduct further investigations and/or removals as needed. The Navy has already developed a list of solid waste debris areas through the EBS program and general housekeeping activities. The Navy has also recently completed visual site inspections of the FOST subparcels in conjunction with EPA and MADEP to verify property conditions (some additional debris was identified and added to the inventory). This information is included in enclosure (7) of the FOST. The Navy's plan to address these debris areas was presented to MADEP in a letter dated 19 Oct 01.

It is also noted in the FOST that, as part of general housekeeping activities, the Navy has already removed solid waste debris from many areas. Enclosure (7) of the FOST indicates which debris has already been removed.

EPA'S GENERAL COMMENTS

1. EPA commented on the Navy's "Interim Responsiveness Summary Addressing Comments on the Draft Finding of Suitability to Transfer for 26 Subparcels at the Former Naval Air Station South Weymouth, Massachusetts" dated November 1, 2000 (i.e., the original version of the Draft FOST) in a letter to the Navy dated December 1, 2000. The Navy has not responded to all of EPA's December 1, 2000 comments; as a result, EPA considers the unaddressed comments unresolved. For case of reference, the comments at issue are repeated below:

Page 3. Navy Response No. 1 Extent of Subparcel Boundaries: The Navy has interpreted EPA's comments on the draft FOST as addressing "the entire Main Base." On the contrary, EPA has not stated that "the present uncertainties" regarding the proposed subparcel boundaries should render the entire Main Base "unFOSTable." Rather, it is EPA's view that significant uncertainty necessarily exists with regard to the boundaries of those particular subparcels that are adjacent to "environmental sites" (e.g., Phase II EBS Review Item Areas (RIAs)/Site Screening Areas) where investigations are not yet complete.

The Navy believes that including a conservative buffer zone (e.g., 20, 50 or 100 feet) between the currently understood environmental site boundaries and the boundaries of the 26 FOST subparcels provides an appropriate factor of safety" to account for uncertainties in the environmental site boundaries. Given that, as the Navy acknowledges, there remain "uncertainties in the environmental site boundaries," EPA believes that it is not prudent to propose a buffer zone of a specific measure without first documenting for each subparcel that there is no unacceptable risk to human health and the environment at or from the subparcel. At a minimum, the Navy should explain the scientific basis for its derivation of these buffer zones, and its conclusion that such buffer zones provide "an appropriate factor of safety." What does this term mean and what is the statutory/regulatory basis for it? Its use is speculative, and it should be quantified.

Response: The extents of the Installation Restoration (IR) Program sites and MCP sites have been well-defined through those programs. Most of the IR Program site investigations

are well into, or have completed, the Phase II RI process. The boundary of the remaining active MCP site (Jet Fuel Pipeline Holding Tank Area) is well defined through the extensive work already completed in that area. None of the IR Program sites or the active MCP sites is located within the subparcels of this FOST.

The Navy's *Phase I EBS* of 18 Nov 96 documents the results of the basewide study to identify the other RIAs at NAS South Weymouth. As of Jan 02, 55 of the EBS RIAs were given final designation for No Further Action (NFA) with concurrence by EPA and MADEP in Feb 02. Of the 16 EBS RIAs located within the FOST subparcels, 10 have received final concurrence on NFA since the draft FOST was issued. NFA has been proposed for the remaining 6 RIAs and final regulatory concurrence is anticipated to be received soon. Of the remaining EBS RIAs at the base (outside of the FOST subparcels), the Navy has proposed NFA for some and is continuing work at others. Before the transfer of any subparcel containing an EBS RIA, the Navy will complete final Decision Documents and/or reach NFA agreements with EPA and MADEP on the RIAs located within that FOST subparcel. Through the IR, MCP, and EBS programs, the Navy has demonstrated that the subparcels of this FOST are suitable for transfer given that no past releases of hazardous substances or petroleum products have occurred or that the required investigations or remedial actions will be completed prior to transfer.

The extent of adjacent sites are based on the best available knowledge. The degree of knowledge for each RIA varies depending on the amount of work completed to date. The FOST process is a determination based on the available information (e.g., sampling data, knowledge of past operational practices, etc.). In each case, professional judgement is used to evaluate what a suitable buffer zone would be between a subparcel to be transferred and an adjacent area of ongoing investigation. The FOST process requires judgement of the known conditions. The transfer documents will contain provisions to allow the Navy to return and mitigate any potential undiscovered unacceptable risks.

Where there is uncertainty or greater potential risks, the Navy has proposed larger buffer zones. For example, no FOST subparcels are located adjacent to the downgradient side of IR Program Site 9. Similarly, as stated in Response to MADEP EBST Comment No. 1 on Subparcel OS-R-3,

the Navy has removed the portion of OS-R-3 from this FOST that is downgradient of the yet-to-be-investigated RIA 109.

The Navy's ongoing investigations have provided sufficient information to allow for a determination of a buffer zone around adjacent environmental sites. The Navy has selected buffer zones of 100 ft around many of the adjacent sites as a conservative distance to allow for the ongoing investigations. As part of the FOST process, the adjacent sites were evaluated on a case-by-case basis. Much larger buffer zones were used around some sites where there are more concerns regarding the impacts to groundwater (e.g., downgradient of IR Sites 7 and 9). In some cases, smaller buffer zones were deemed suitable such as around sites with localized impacts to surface soil that are unlikely to migrate to surrounding areas. The 20 ft buffer zone around French Stream was based on the conclusion that any potential impacts would be limited to surface water and sediment in the immediate vicinity of the stream. As described in the Response to EPA's General Comment No. 6, a larger buffer zone was included around Old Swamp River.

EPA appears to acknowledge the adequacy of the Navy's buffer zones around sites of hydrogeologic concern in their General Comment No. 7 which states "The representations of the potential impact of adjacent sites on the subparcels under consideration are generally accurate and objective; i.e., the subparcels either are not directly downgradient of any CERCLA or EBS RIA site, or are downgradient of sites with few contaminants that would likely be mobile to groundwater."

The EBST descriptions of adjacent sites has been expanded to clarify the rationale for the specified buffer zones.

Page 19. Navy Response to Comment No. 8, 1st paragraph:
"The Navy plans to issue a No Further Action Proposed Plan in Jan 00. Shouldn't this be "Jan 01?"

Response: Yes, the intended date was Jan 01. The final *Proposed Plan* for the Small Landfill was actually issued during Apr 01. However, the FOST has been modified to cite the recently completed ROD for the Small Landfill of Mar 02.

2. The FOST is presented as a draft; however, the associated cover letter from the Navy (dated 30 March 2001) indicates that this is the "Final Draft" version. Please clarify. In addition, the Navy's cover letter states that EPA's and

MADEP's "comments have been incorporated or otherwise addressed." On the contrary, EPA's previous comments have not been incorporated or otherwise addressed in this revised version of the original Draft FOST. Several significant issues, as detailed in this comment letter, need to be resolved before EPA can concur on this Draft FOST.

Response: Comment noted. The FOST of 30 Mar 01 was the first version reviewed by the public and therefore was called a "draft". The cover letter's reference to the FOST as a "draft final" was indicative that this is the second version issued to EPA and MADEP for review. The distinction is semantics. The Navy's obligation is to issue a draft for a public comment period, prepare a Responsiveness Summary that addresses public and regulatory comments, and then issue the final FOST.

The statement that "...[EPA and MADEP] comments have been incorporated or otherwise addressed" presented in Item 8 of the FOST Memorandum is a standard statement that appears in a final FOST. Therefore, this language was included in the draft FOST for review. This Responsiveness Summary describes how the Navy is addressing regulatory comments on the FOST. **Future draft FOSTs (and similar) will indicate that the regulatory review is ongoing.**

3. As requested by EPA in its comments on the original Draft FOST, the Navy has compiled summary tables of all Installation Restoration (IR), Massachusetts Contingency Plan (MCP), and environmental Baseline Survey (EBS) sites/areas and identified the status of each site/area. These tables have been provided in the FOST as Enclosures (3), (4), and (5). The tables indicate that, for many of these sites/areas, investigations are ongoing or further assessment is necessary. This reinforces the primary comments that EPA made in its May 22, 2000 letter to the Navy:

EPA is concerned that certain of the subparcels, which it has not concurred are "uncontaminated" under the Community Environmental Response Facilitation Act (CERFA), are adjacent to or overlap Areas of Concern (AOC) where a Remedial Investigation (RI) has not yet been completed under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). It is premature to define property boundaries for the transfer of a parcel that has not been identified as CERFA-uncontaminated and that overlaps, borders on, or is in close proximity to an AOC,

for which the Navy has not yet completed the CERCLA RI and determined the full extent of the contamination (e.g., groundwater contamination). Without this information, the Navy cannot guarantee that it can draw property boundaries that would allow the transfer of such a parcel (or portion of a parcel) without a CERCLA Section 120(h)(C) covenant deferral. This is because any real property that contains CERCLA contamination may not be transferred from federal government ownership except through the early transfer process established under CERCLA Section 120(h)(C).

The Agency is also concerned that certain of the subparcels, which it has not concurred are "uncontaminated" under CERFA, are adjacent to or overlap Site Screening Areas (SSAs) (i.e., Phase II EBS Review Item Areas (RIAs)) where the Navy has not yet documented whether further action is necessary. It is premature for the Navy to define boundaries for these subparcels before it documents the results of its investigations at the SSAs/RIAs that are adjacent to or near them. The Navy has not determined either whether these SSAs/RIAs, will require no further action, or action under CERCLA or the MCP or what the extent of any contamination may be.

While the Navy has conducted additional assessments/ investigations at several areas/sites and has submitted additional reports since the original Draft FOST and EPA's May 22, 2000 comment letter, the status tables in the Draft FOST indicate that work is still ongoing at several of the EBS, MCP, and IR sites/areas, and that many of the reports, RAOs, and decision documents are still pending or in the process of regulatory review/comment resolution. In addition, it is important to note that most of the decision documents issued will require further field investigation under the CERCLA program. Given this, EPA's comments from its May 2000 letter stand and must be resolved.

Response: See Response to EPA General Comment No. 1. The Navy acknowledges that investigations are ongoing at several sites. However, the FOST subparcels are comprised of property that either contains no AOC, or EBS RIAs that have been determined to require NFA, or EBS RIAs that, based on review of analytical results, are soon to be completed as NFA by the Navy prior to transfer to the SSTDC. FOST subparcels are set back from active sites (buffer zones).

4. The Memorandum for the Record states that: "there are no identified impacts" to the Draft FOST subparcels from the IR Program sites, the remaining active MCP sites or the EBS RIAs. The selection of the word "identified" makes this an accurate statement since some investigations are ongoing, and it is not possible to identify potential impacts with any certainty at some sites at this time. However, it is not clear that the Navy has made reasonable efforts to identify impacts to these subparcels by the migration of potentially contaminated groundwater onto the subparcels from upgradient source areas or to evaluate potentially contaminated groundwater discharging to French Stream or the Old Swamp River as a whole.

Response: The Navy has demonstrated more than reasonable efforts to investigate the identified IR Program, MCP, and EBS sites at NAS South Weymouth. In addition to these basewide programs, the Navy also recently completed redundant site walks of the FOST property with the EPA and MADEP to verify previous observations. The Navy has set back the FOST subparcels from areas requiring further investigation and will include covenants in the transfer documents that will allow the Navy to return and address any undiscovered/expanded AOC. The Navy will conduct a watershed ecological risk assessment for French Stream and Old Swamp River; however, these water bodies and their stream banks are not included in this FOST.

5. The Navy must ensure that the subparcels to be transferred, as well as other accessible areas (e.g., French Stream and the Old Swamp River), do not pose any unacceptable risk to receptors under the intended reuse scenario (e.g., open space, industrial, etc.) or any potential future reuse scenario (e.g., residential). Risks to receptors may be prevented through effective legal means (i.e., deed restrictions). All potential future reuses that would pose potential risks to receptors should be restricted by such legal means unless the transferee conducts additional investigations to provide information to the contrary, or implements the necessary remedial measures.

Response: The zoning has already been established/approved by the towns. The Navy is conducting the FOST with respect to the approved zoning provided by the towns to which the SSTTDC is required to implement. Much of the property in this FOST contains no environmental sites and is therefore suitable for unrestricted use and unlimited exposure. Clause (8) of enclosure (2) addresses conditions that may affect the allowed uses under the approved zoning.

EPA Follow-up Comment from 10 Sep 01: The Navy has redrawn certain FOST subparcel boundaries and altogether omitted Subparcel OS-A-2. As a result, based on currently available information, the property now addressed by the FOST does not contain any CERCLA site that poses an unacceptable risk to human health or the environment, any active Massachusetts Contingency Plan (MCP) site, or any Review Item Area (RIA) that will become a CERLCA or MCP site. Nonetheless, some of the FOST subparcels still overlap with or are adjacent to such environmental sites of concern. Furthermore, EPA is still concerned about the impact of adjacent or upgradient environmental sites on certain of the subparcels. For those reasons, EPA below has requested additional restrictions on certain subparcels, such as access restrictions to control potential exposure to French's Stream and Old Swamp River at points adjacent to subparcels proposed for transfer.

Response: Comment noted. See other responses for more details.

6. From an ecological standpoint, a watershed ecological risk assessment has been proposed to determine impacts to waterways at South Weymouth. EPA does not know when this study will be completed. The transfer of FOST subparcels that abut or include French Stream and the Old Swamp River is premature until the watershed ecological risk assessment is complete. These include: B-1W-1, OS-A-1, OS-A-2, OS-C-1, OS-R-1, OS-R-2, OS-R-3, OS-R-4, SPUD-4 and OS-R-5.

Response: The Navy has commenced the watershed ecological analysis. Also, the Navy's plan for closing RIA 62 (French Stream) and RIA 104 (Old Swamp River) is still under consideration. Therefore, the FOST includes a 20 ft buffer zone away from the banks of French Stream and a larger buffer around Old Swamp River that includes the surrounding wetland area (likely floodplain of the river; whereas French Stream is well-confined by its steep banks). Potential impacts to French Stream and Old Swamp River are likely to be limited to the immediate vicinity of the stream/river (e.g., surface water or sediment deposition). Therefore, the Navy believes these buffer zones to be sufficient for transfer of the abutting subparcels and to support the Navy's watershed analysis and resolution of RIAs 62 and 104.

EPA Follow-up Comment from 10 Sep 01: EPA's comment referred to the fact that the watershed ecological risk assessment might affect the suitability for transfer of subparcels that abut or include French's Stream and Old Swamp River. The Navy's response regarding the buffer zone is adequate relative to ecological concerns; however, EPA questions the accuracy of the response that "the northern portion of French's Stream through subparcels B-1W-1 and OS-C-1 is suitable for transfer because potential impacts are located further downstream". Such a determination will depend on results of surface water and sediment sampling in the wetland area south of RIA 53, and this sampling has not yet been completed.

Please review the hydrologic relationship between the wetland and French's Stream. If it is determined that this stream is fed by the wetland, this section of French's Stream cannot be assumed clean until the wetland is determined to be clean. Similarly, please confirm the location of the wetland relative to the western section of Subparcel OS-C-1. It seems likely that the wetland extends into the subparcel. Until the Navy determines that this wetland is not impacted by RIA 53, transfer of the western section of Subparcel OS-C-1 is premature.

Response: This comment pertains to the draft response. As stated in the modified response above, French Stream (including the portions in Subparcels B1-W-1 and OS-C-1) has been removed from the FOST.

However, there is no channel that directly connects the drainage ditch and wetlands in the northwest corner of the base to French Stream. RIA 53 (former radio transmitter building) is virtually surrounded by wet areas (some that are currently dry). The site plus buffer zone is approximately 400 ft from French Stream. Investigations are ongoing at RIA 53. However the previous data did not show highly elevated concentrations of chemicals of concern (COCs) that would be transported great distances without significant dilution or attenuation. Arsenic in soil was detected at a concentration consistent with background levels. Furthermore, most of the flow of French Stream in this area is attributed to flow coming onto the base from offsite, with some baseflow from the discharge of groundwater locally. The "Mobe 1" groundwater data at RIA 53 do not show impact

from RIA 53. These validated data will not be published in a formal Decision Document in time to support this FOST; however, they can be provided to the regulators for review if it will help them resolve concerns about the FOST.

As evidenced by visual inspections and SSTTDC's recent wetland delineation, the wetland area around RIA 53 does extend into subparcel OS-C-1. However, the Navy does not have evidence indicating that RIA 53 has impacted the wetland beyond the currently mapped extent of RIA 53 and the buffer zone. Evaluation of sampling data from RIA 53 is ongoing. However, it is unlikely that the low concentrations of COCs detected in surface water and sediment samples from RIA 53 would impact French Stream. At its closest, French Stream is located over 400 ft from RIA 53 and the land in between is wetland, and as noted there is no direct channel to French Stream. Given the low concentrations of COCs in surface water and sediment at RIA 53, the likely minor surface water flow through the wetland area, and the attenuating properties of wetlands (i.e., wetlands serve as a buffer mitigating potential COC transport), it is highly unlikely that COCs would migrate in significant quantities and adversely impact the stream.

EPA acknowledges that the buffer zone around French Stream is adequate for ecological concerns. The buffer zone is also adequate for human health concerns given that no residential development will occur around French Stream in this area due to the presence of wetlands and the zoning of the surrounding parcels for open space and business use. Potential human exposure routes would be limited to trespassers and recreational users and potential exposures to COCs under such scenarios would be far lower than for a conservative residential scenario that is considered in Phase II EBS evaluations.

Therefore, the FOST can proceed as-is in the area of RIA 53. If in the future, the extent of the problem is found to be greater than currently understood, then the Navy can coordinate with SSTTDC to expand the investigation of RIA 53. The language of the FOST already contains provisions that allow the Navy access to transferred property to conduct any required environmental investigations (to be included in pending property transfer documents).

7. The Draft FOST has been reviewed with regard to potential hydrological impacts to the subparcels designated for transfer. In particular, the setting of each subparcel relative to CERCLA sites and EBS RIA sites was considered. The representations of the potential impact of adjacent sites on the subparcels under consideration are generally accurate and objective; i.e., the subparcels either are not directly downgradient of any CERCLA or EBS RIA site, or are downgradient of sites with few contaminants that would likely be mobile to groundwater.

A possible exception is subparcel SPUD-6, which lies "within the east/south portion of the runway triangle." This subparcel is downgradient of the Fire Fighting Training Area (FFTA) and appears to contain at least a portion of the surface drainage associated with the TACAN Outfall. These sites have been the subject of ongoing discussions regarding possible impacts to the wetland within SPUD-6; this wetland appears to receive both groundwater discharge from the direction of the FFTA and surface water from the TACAN Outfall system.

Response: Due to the ongoing investigation of the TACAN area, the northern section of SPUD-6 has been removed from the FOST. The southern portion of SPUD-6, which is not downgradient of the FFTA and does not contain the wetlands within the runway triangle, has been retained in the FOST.

8. The Navy proposes a general 20-foot set back for those portions of French Stream and the Old Swamp River that are adjacent to the boundaries of Draft FOST subparcels. EPA assumes that the Navy has proposed this setback as a protective measure to avoid potentially contaminated sediments and/or surface water; however, the scientific basis of the proposed setback is not provided, and it is not clear that access to French Stream or the Old Swamp River will be restricted in any way. In sum, the protectiveness of the 20-foot setback cannot be evaluated at this time.

Response: Potentially impacted surface water and deposited sediment would be limited to the immediate vicinity of the water bodies simply by the mechanics of stream flow and sediment deposition. Given the seasonal changes in flow for Old Swamp River and the surrounding wetland area, the buffer zone around the river has been increased to include the surrounding wetlands (the likely floodplain). The

20 ft buffer for French Stream is sufficient as that stream is well-confined by its steep banks.

French Stream (south of the east-west runway) and Old Swamp River (fenceline to fenceline) are not included in the FOST and therefore will not be part of a subsequent transfer of the FOST subparcels. Those portions of French Stream and Old Swamp River will remain Navy property for now; therefore, the SSTTDC will not be allowed to redevelop those areas yet and the Navy will not allow unescorted access by any non-Navy personnel to those areas. Resolution of RIA 62 (French Stream) and RIA 104 (Old Swamp River) is still necessary and may be predicated on the results of the pending watershed study. However, to date, no other restrictions appear to be necessary for the protection of human health and the environment.

EPA Follow-up Comment from 10 Sep 01: The Navy's response clarifies that French's Stream and Old Swamp River are not part of any FOST subparcel; however, it still appears that the water bodies are adjacent to FOST subparcels. It is unclear that a 20-foot setback alone would prevent access to French's Stream and Old Swamp River. Please clarify whether additional land use controls, such as fencing or sign postings, will be implemented to prevent access to these water bodies from FOST subparcel users/occupants. Additional measures beyond establishing a 20-foot buffer to prevent access to these water bodies should be employed to reduce potential risks to future FOST subparcel users/occupants.

Response: The Navy will be responsible to maintain the security of land that is temporarily retained by the Navy so that environmental investigations can be completed. The Navy will coordinate with SSTTDC to evaluate the security needs for property containing French Stream and Old Swamp River with respect to the future long-term development of the transferred property. Currently, there is no need for fencing or warning signs along the stream or river because there is little access to those areas of the base. If during the redevelopment of adjacent areas, there is an unacceptable potential for people to enter these areas, then the Navy will, at that time, consider the appropriate specific access control measures.

See the above response regarding the buffer zone around Old Swamp River.

9. In recent walkovers for the Draft FOST, EPA personnel noted the presence of solid waste at many of the walkover sites. The solid waste was mainly concrete with rebar, small metal buckets, braided metal cables, old building foundations and household trash (e.g., plastic bottles, Styrofoam cups, plastic bags, etc.). The Navy was aware of this waste in most cases. There were also some isolated 55-gal drums, but all were empty and corroded to the point that no markings were evident.

Response: See the Navy's General Response No. 6 regarding the Navy's policy on solid waste debris at NAS South Weymouth. Since no specific debris areas are noted in this comment, please see the Navy's responses to EPA/MADEP's specific comments regarding individual debris areas.

10. The area in acres of each subparcel as provided in Table 1 of the Memorandum for the Record and the table on Page 1 of enclosure are not consistent with the text descriptions for each subparcel. The correct acreage should be identified for each subparcel and used consistently throughout the Draft FOST.

Response: Comment noted. The FOST has been corrected.

11. The color coding scheme on Figures 3 through 15 of the Draft FOST should be reviewed and corrected as necessary. FOST subparcels are shown in green (Figure 3) and then yellow (e.g., Figure 4); however, the colors in the legend do not change. In addition, it is initially difficult to discern the boundaries between subparcels on certain figures (e.g., subparcels OS-R-5 and SPUD-7 on Figure 12).

Response: The yellow highlighting was intended to visually identify the particular FOST subparcel(s) that was the subject of each figure from the other surrounding FOST parcels. Color-coding has been made consistent. The boundaries between subparcels are now more clearly demarcated.

12. The BOQ, Building 31, is interchangeably referred to as the Billeting Officers Quarters and the Bachelors Officers Quarters throughout the Draft FOST. It is believed that the latter is correct, but this should be confirmed and the references throughout the Draft FOST should be corrected accordingly.

Response: The FOST has been modified to refer to Building 31 only as the Bachelor Officers Quarters.

EPA'S COMMENTS ON THE MEMORANDUM FOR THE RECORD

1. Pages 2 to 3 of 5, Table 1 (also Page 1 of EBST). The acronym definition list (provided in the footnotes) should be expanded to include "B" and "SR."

Response: Comment noted. The referenced acronyms used in the subparcel designations have been clarified in the text.

2. Page 4 of 5, Item 5. Before the transfer of any subparcel covered by the Draft FOST may occur, the Navy must submit, and EPA and MADEP must approve, the final decision documents for every RIA that is located within a subparcel covered by the Draft FOST.

Response: Comment noted. Before the transfer of any property containing an EBS RIA, the Navy will complete final Decision Documents and/or reach NFA agreements with EPA and MADEP for that RIA. No Decision Documents will be prepared for RIAs that were transferred to other programs or deemed to require NFA during the early stages of the EBS program. As of Feb 02, the Navy, EPA, and MADEP have agreed on NFA for 10 of the 16 RIAs located within the FOST subparcels. The Navy is currently working with EPA and MADEP toward reaching final NFA Decision Documents or NFA agreements as soon as possible for the remaining 6 EBS RIAs contained within the FOST subparcels.

3. Page 4 of 5, Item 7. Please revise the 1st sentence to read "In accordance with the Federal Facility Agreement for the NAS South Weymouth NPL site, this document, including enclosures (1) through (5)..."

Response: Comment noted. The text has been modified as requested.

4. Page 5 of 5, Item 8, 2nd sentence. Please insert "or to" after "without interference from" and "the ongoing environmental restoration process."

Response: Comment noted. The text has been modified as requested.

5. Page 5 of 5, Item 8, last sentence. Enclosure (2) - the Environmental Covenants, Conditions, Reservations, and Restrictions - must also be included in and made part of the transfer deed(s) for the Draft FOST subparcels.

Response: Comment noted. The text has been changed accordingly.

EPA'S COMMENTS ON THE EBST

6. Page 4 of 34. This list cites to NFA decision documents for EBS RIAs 42, 46 and 51. Before the transfer of any subparcel covered by the Draft FOST may occur, the Navy must submit, and EPA and MADEP must approve, the final decision documents for every RIA that is located within a subparcel covered by the Draft FOST.

Response: Before the transfer of any subparcel containing an EBS RIA, the Navy will complete final Decision Documents and/or reach NFA agreements with EPA and MADEP on the RIAs located within that FOST subparcel. No Decision Documents will be prepared for RIAs that were transferred to other programs or deemed to require NFA during the early stages of the EBS program. The Navy issued a final Decision Document for RIAs 42, 46, and 51 in Apr 02. With the 30-day review period, the Navy anticipates receiving regulatory concurrence in May 02.

7. Subparcel B-1W-1, Page 7 of 34, Bullet 2. The Navy states that "The conditions at RIA-53 are unlikely to adversely impact subparcel B-1W-1 because it is hydrologically cross-gradient (i.e., potentially impacted groundwater or surface water from the area of RIA-53 does not enter subparcel B-1W-1)". However, Figure 10 of the "Focused Groundwater Flow Direction Study" (dated July 13, 2000) shows that groundwater flows to the south/southwest in the direction of the northernmost portion of B-1W-1. In addition, CERCLA investigations are ongoing at RIA-53 (Draft Work Plan dated February 19, 2001). Additional information is needed before EPA can concur that there is no impact to subparcel B-1W-1 from RIA-53.

Response: Subparcel B-1W-1 is located over 125 ft away from RIA 53. The most recent groundwater flow information from the EBS program (from the 18 Jun 01 sampling event) indicates that groundwater flow is separated from the subparcel by a low-lying wetland area and that groundwater discharges to the stream north and west of RIA 53. Therefore, the statement that "The conditions at RIA-53 are unlikely to adversely impact subparcel B-1W-1 because it is hydrologically cross-gradient (i.e., potentially impacted groundwater or surface water from the area of RIA-53 does not enter subparcel B-1W-1)" is correct.

EPA Follow-up Comment from 10 Sep 01: EPA's comment referred to the potential influence of RIA 53 on Subparcel B-1W-1. The Navy's response notes that groundwater flow from RIA 53 is separated from the subparcel by a low-lying wetland area, and therefore, conditions at RIA 53 are unlikely to adversely impact subparcel B-1W-1. The location of the wetland areas south of RIA 53, which is not yet characterized relative to B-1W-1, is not indicated on Figure 3. Please confirm that the subparcel does not contain part of this wetland.

Response: As evidenced by visual inspections and SSTTDC's recent wetland delineations, a large portion of Subparcel B1-W-1 does contain wetlands. However, see Response to EPA General Comment No. 6 above. Impacts from RIA 53 have not been identified in Subparcel B-1W-1. Although investigations are ongoing at RIA 53, it is unlikely that the conditions at RIA 53 would adversely affect B-1W-1 given the presence of the low-lying wetland in between the two areas, which would attenuate potential COC migration. In addition, the majority of B-1W-1 is also separated by RIA 53 by Calnan Road and French Stream itself.

8. Subparcel INST-1, Page 7 of 34, Bullet 1. Page 184 of the Phase I EBS states that an old and abandoned furnace of Building 31 was visually observed to be "wrapped loosely in plastic with asbestos warning labels attached to the outside." Clarify whether this asbestos has been removed. If not, the FOST should clearly state the presence of this condition. In addition, the text of this bullet states that two fuel oil spills (total 1,735 gal) were addressed under the MCP by removing the underground storage tank (UST) and impacted soil. An AUL has been implemented for residual petroleum in the subsurface soil beneath a portion of the footing of the building. However, it is unclear whether the groundwater was also contaminated. Clarify the status of the groundwater and the potential impacts to the proposed reuse of this subparcel. Also, Release Tracking Number (RTN) 3-10469 is not depicted on Figure 4.

Response: The EBST has been clarified to indicate that the boiler insulation is no longer present. The EBST has been modified to indicate that the Aug 01 update of the PIH Survey for NAS South Weymouth reported that asbestos-containing materials (ACMs) in Building 31 remain in good condition.

A Class A-3 RAO has been completed for the BOQ Site which includes RTNs 3-10239 and 3-10469. As stated in the RAO report of 13 Oct 99, groundwater samples were collected and no separate phase petroleum or petroleum related compounds were detected in groundwater samples from the monitoring wells. The RAO report also states that soil vapor samples from beneath the floor of the building did not exceed DEP's risk action levels with regards to potential indoor air hazards from volatilization of residual petroleum products. The EBST and EBST figures have been clarified accordingly.

9. Subparcel INST-1, Page 7 of 34, Bullet 2. This bullet states that the SSTTDC plans to demolish Building 31 as part of the base redevelopment; however, the plans of the SSTTDC do not ensure that the action (i.e., demolition) will take place. The Environmental Covenants, Conditions, Reservations, and Restrictions (Enclosure 2) should implement access restrictions and personal protective measures for entry until such time as the building is demolished (or remedial measures if the building is not demolished) because of the presence of fungus in Building 31, which may pose an indoor air hazard. Also, please insert "not" between "will," and "pose" in the second sentence.

Response: A covenant/restriction has been added to enclosure (2) that requires the use of PPE in Building 31 unless the building is demolished or the indoor air hazard is mitigated by the grantee.

Also, the referenced text has been correct to state that "This condition will not pose a hazard to future users...".

10. Subparcel INST-1, Page 7 of 34, Bullet 3. This bullet should be expanded to explain that the Environmental Covenants, Conditions, Reservations, and Restrictions (Enclosure 2) identifies the presence of damaged asbestos in the crawl space of Building 49 and imposes access restrictions (clause 8(d)).

Response: Comment noted. The text has been changed accordingly.

11. Subparcel INST-1, Page 7 of 34. This subparcel contains Building 31, which, according to clause 8(a) of the Environmental Covenants, Conditions, Renovations, and Restrictions (Enclosure 2), has lead dust on the floor of the kitchen and the basement. The presence of lead dust in

Building 31 should be identified in the description of subparcel INST-1.

Response: Comment noted. The text has been modified accordingly.

12. Subparcel OS-A-2, Page 8 of 34. The ECP category is incorrectly listed as 1. Table 1 of Enclosure 1 (Page 2 of 15) states the ECP category is "[c]urrently 5, but will be 4 after removal action." The ECP category should be corrected accordingly.

Response: Due to the required additional work at RIA 100, subparcel OS-A-2 has been removed from the FOST. The Environmental Condition of Property (ECP) category for OS-A-2 will be re-evaluated at a later date.

13. Subparcel OS-A-2, Page 9 of 34, Bullet 1. Prior to EPA concurrence on the transfer of this subparcel, the removal action must be completed and all required documentation finalized.

Response: Due to the required additional work at RIA 100, subparcel OS-A-2 has been removed from the FOST.

14. Subparcel OS-A-2, Page 9 of 34, Bullet 2. Unlike subparcel OS-A-1, subparcel OS-A-2 does not have a proposed 20-foot setback from French Stream. While EPA has not yet agreed that a 20-foot set back is appropriate or sufficient in any location, it is unclear why the Navy's approach is different for subparcel OS-A-2.

Response: Due to the required additional work at RIA 100, subparcel OS-A-2 has been removed from the FOST.

15. Subparcel OS-C-1, Page 9 of 34. Behind Building 24 (Dispensary), an area was discovered that could have been an incinerator for the disposal of medical waste. The Navy was supposed to review site maps and historical photographs to determine what was in this area. The area was small, but there appeared to be a vehicle access road behind the Dispensary that led up to a concrete base (approximately 10 feet by 10 feet) in the area. There were several pieces of coal house brick in the area, and it appeared that there had been burning there. Again, given the proximity to the Dispensary, the area could have been used to burn medical waste, but it is not possible to tell what kind of structure was there. If there was burning in the area, there is a possibility of dioxins in the media in the area.

At a minimum, the Navy must complete its research into the history of the area.

Response: Records reviews and inspections did not reveal the structure's purpose or past use. Therefore, during the week of 15 Oct 01, the Navy removed the concrete structure and the surrounding debris (e.g., brick, mortar, ash, etc.). The Navy also collected confirmatory soil samples for TCL-organics, TAL-inorganics, and dioxin analyses to confirm that NFA is required prior to the transfer of this area. As documented in the *Final Removal Action Report*, RIAs 95A, 56, 7A, 36, 55C, 96A, Deluge Tank, and BBQ Pit/Incinerator Area of 23 Jan 02, the results of confirmatory analyses did not exceed applicable soil standards; therefore, NFA is required.

EPA Follow-up Comment from 10 Sep 01: The Navy's response mentioned that fencing may be used to limit access to the potential burn area behind the dispensary. EPA would support fencing and posting the area as off-limits in order to reduce potential access to this area.

Response: This comment refers to the Navy's draft Response to Comment No. 15 of 24 Sep 01. As noted above, the Response to Comment No. 15 has been modified in light of the Navy's recent removal of the structure/debris and the results of the confirmatory samples.

16. Subparcel OS-C-1, Page 9 of 34, Bullet 3. Before the transfer of any subparcel covered by the Draft FOST may occur, the Navy must submit, and EPA and MADEP must approve, the final decision documents for every RIA that is located within a subparcel covered by the Draft FOST.

Response: Comment noted. Before the transfer of any subparcel containing an EBS RIA, the Navy will complete final Decision Documents and/or reach NFA agreements with EPA and MADEP on the RIAs located within that FOST subparcel. No Decision Documents will be prepared for RIAs that were transferred to other programs or deemed to require NFA during the early stages of the EBS program. As of Feb 02, the Navy, EPA, and MADEP have agreed on NFA for 10 of the 16 RIAs located within the FOST subparcels. The Navy is currently working with EPA and MADEP toward reaching final NFA Decision Documents or NFA agreements as soon as possible for the remaining 6 EBS RIAs contained within the FOST subparcels.

17. Subparcel OS-C-1, Page 9 of 34, Bullet 4. The reference to Building 25 in the first sentence of this paragraph should be corrected to Building 98.

Response: Comment noted. The text has been corrected as requested.

18. Subparcel OS-C-1, Page 10 of 34, Bullet 3. With respect to RIA-51 (asbestos-lined pipe), the Environmental Covenants, Conditions, Reservations, and Restrictions (Enclosure 2) must be modified to include an AUL, to prevent potential future excavation in this area. Enclosure (5) notes that "No excavation of soil is permitted," but this must be enforceable by legal means.

Response: Comment noted. In addition to RIA 51, it is likely that other areas of the subsurface infrastructure at NAS South Weymouth include asbestos-lined pipes.

A restriction has been added to enclosure (2) that disallows excavation of such areas except in accordance with an approved Health and Safety Plan or under the supervision of trained personnel using proper personal protective equipment (PPE) and procedures in accordance with federal, state, and local regulations. The Navy will provide SSTDC with the available maps of the infrastructure at NAS South Weymouth as part of the property transfer process.

19. Subparcel OS-C-1, Page 11 of 34, Bullet 2. The Draft Final Phase II Remedial Investigation Report for the Sewage Treatment Plant (dated March 2001) states in Section 8.0, that potential risks posed under a hypothetical future site use (i.e., onsite resident and recreational child) are in excess of EPA's acceptable risk range. The chemicals contributing most to these potential human health risk exceedances include arsenic in groundwater. It is not clear that exposure to groundwater alone would exceed acceptable risk criteria, however, the Navy should evaluate whether the portion of subparcel OS-C-1 that is located downgradient of the Sewage Treatment Plant could potentially be affected. If so, appropriate restrictions should be placed in this area to prevent groundwater exposure through future residential or recreational land use.

Response: The Navy will be conducting a Feasibility Study to develop and evaluate remedial alternatives for the former Sewage Treatment Plant (IR Program Site 7). The FOST currently includes a 200 ft buffer zone on the

downgradient side of Site 7. The Navy believes this buffer zone is sufficient for the protection of human health in OS-C-1 with respect to Site 7 given that arsenic in groundwater was only detected in one of the downgradient wells from Site 7 (MW-57D2) at a concentration (5.7 ug/L) that only slightly exceeded the drinking water MCL (5 ug/L). Arsenic concentrations were non-detect in the other downgradient wells from Site 7 (MW-57, MW-57D, MW-64, MW-64D, MW-64D2). Given that the subparcel is downgradient of Site 7 is zoned for open space reuse (and not residential use), the identified unacceptable risk scenario for future residents is not an issue. Recreational use of groundwater in this area is unlikely because this area is not in a potentially productive aquifer nor is it targeted by SSTDC for water supply development.

20. Subparcel OS-C-2, Page 12 of 34, last Bullet. Before the transfer of any subparcel covered by the Draft FOST may occur, the Navy must submit, and EPA and MADEP must approve, the final decision documents for every RIA that is located within a subparcel covered by the Draft FOST.

Response: Comment noted. Before the transfer of any subparcel containing an EBS RIA, the Navy will complete final Decision Documents and/or reach NFA agreements with EPA and MADEP on the RIAs located within that FOST subparcel. No Decision Documents will be prepared for RIAs that were transferred to other programs or deemed to require NFA during the early stages of the EBS program. As of Feb 02, the Navy, EPA, and MADEP have agreed on NFA for 10 of the 16 RIAs located within the FOST subparcels. The Navy is currently working with EPA and MADEP toward reaching final NFA Decision Documents or NFA agreements as soon as possible for the remaining 6 EBS RIAs contained within the FOST subparcels.

21. Subparcel OS-R-1, Page 12 of 34, Bullet 1. This subparcel is zoned for reuse as Business R and D and not open space (see 1998 Reuse Plan).

Response: Disagree. As shown on the "Land Use Plan" (15 Jan 98) and the "Proposed Zoning Map" (20 Jan 98) presented in the Reuse Plan of 27 Jan 98, the property of subparcel OS-R-1 (i.e., the strip of land along the north fenceline of the eastern extension that is west of Old Swamp River) is zoned for open space. Subparcel SPUD-3, which is also depicted on the same figure (Figure 9) as subparcel OS-R-1, is indicated as a "business" area on the "Land Use Plan" map.

22. Subparcel OS-R-3, Page 13 of 34, Bullet 3. The FOST states that no impacts are expected from RIA 2C to this subparcel. The Navy recommendation was for further action under CERCLA at RIA 2C. Until action at RIA 2C is complete, transfer of OS-R-3 is premature.

Response: See Response to MADEP's EBST Comment No. 1 on Subparcel OS-R-3. The Navy has removed the portion of OS-R-3 from the FOST that is downgradient of RIAs 1A, 2C, and 109.

EPA Follow-up Comment from 10 Sep 01: EPA's comment noted that transfer of Subparcel OS-R-3 is premature until action at RIA 2C is complete. The Navy's response states that the portion of OS-R-3 east of a line 100 feet west of Union Road has been removed from the subparcel because this section is downgradient of RIAs 1, 2C, and 109. It should be noted, however, that the western section of RIA 2C remains upgradient of the northern part of OS-R-3 (Figure 11). Please reconsider the potential effects of this portion of RIA 2C on Subparcel OS-R-3 before transferring that subparcel (and include language regarding these potential effects of the lack thereof in the FOST).

In addition, while the remaining area of OS-R-3 may be upgradient of RIAs 1 and 109 and the eastern section of RIA 2C from a surface flow perspective, it is not upgradient relative to groundwater flow. Especially for RIA 109, which has yet to be investigated, the groundwater impacts of the RIA (or the lack thereof) should be determined before any property adjacent to the RIA is deemed suitable for transfer.

Response: The Navy anticipates that NFA is required for RIA 2C and the FOST has been revised to include a 120 ft buffer from RIA 109 (detections at background sample location BG-07). The buffer is even greater for RIA 1A (potential polychlorinated biphenyls [PCBs] in former OLS vaults). Therefore, Subparcel OS-R-3 is suitable to transfer as per the revisions described in the Responsiveness Summary.

RIA 2C was designated in order to address the suspected over-use of herbicides around the runway lighting. Completed sampling at RIA 2C indicated that the analyte concentrations were consistent with background levels and normal herbicide applications;

therefore, the Navy believes that NFA is required. The Navy agreed to conduct an additional round of sampling at RIA 2C to confirm that NFA is required. Preliminary data from that additional sampling support that NFA is likely.

The potential COCs at RIA 1 are PCBs, which are generally non-mobile in soil or groundwater; therefore, the over-300 ft buffer zone is adequate. Furthermore, the Navy proposes NFA for RIA 1A because the Navy has already removed the PCB equipment, pumped the water out of the vaults, and detected PCBs at levels lower than benchmarks in the samples of the vault sediment. The Navy has backfilled the vaults.

Evaluations of groundwater flow in the area of RIA 109 are ongoing; however, groundwater flow at this area is believed to be in the direction of Old Swamp River (to the east). Therefore, the retained portion of OS-R-3 in the FOST (to the west) is not anticipated to be impacted by the conditions at RIA 109 and is suitable for transfer.

23. Subparcel OS-R-3, Page 13 of 34. Bullet 3. The FOST argues that no impacts to OS-R-3 are expected from RIAs 8, 9A, and 9B due to the distance (greater than 100 feet) from the subparcel. This buffer distance may be in question, as noted elsewhere in this review. EBS investigations at these RIAs are ongoing, and if the buffer distance is altered, the potential impacts of these RIAs on OS-R-3 should be revisited.

Response: See Response to EPA General Comment Nos. 1 and 3. Note that the current buffer zones between OS-R-3 and RIAs 8, 9A and 9B are 100 ft, 180 ft, and 140 ft, respectively.

24. Subparcel OS-R-5, Page 14 of 34. Bullet 3. EPA has not yet received Decision Documents for RIAs 7A and 7B. Before the transfer of any subparcel covered by the Draft FOST may occur, the Navy must submit, and EPA and MADEP must approve, the final decision documents for every RIA that is located within a subparcel covered by the Draft FOST.

Response: A final NFA Decision Document was completed for RIA 7B on 31 Jan 02. The Navy will complete a final NFA Decision Document for RIA 7A prior to the transfer of that site area. The Navy provided a draft NFA Decision Document for RIA 7A on Jul 01. EPA has indicated their agreement

with the NFA decision for RIA 7A in their letter of 15 Aug 01. MADEP has verbally agreed. The final NFA Decision Document will be finalized to include the report documenting the removal of solid waste at this location.

EPA Follow-up Comment from 10 Sep 01: EPA's comments stated that before the transfer of Subparcels OS-R-5 and SPUD-2 may occur, the Navy must submit, and EPA and MADEP must approve, a final decision document for each RIA located within these subparcels. The Navy's responses indicated that the Navy intends to submit final decision documents "and/or reach NFA agreements with EPA and MADEP" on these RIAs. Please note that EPA wants to see final decision documents, not just reach NFA agreements, for the RIAs located within Subparcels OS-R-5 and SPUD-2.

Response: This comment pertains to the draft Response to EPA Comment No. 24 of 24 Sept 01. The above Response has been modified as requested.

25. Subparcel SPUD-1, Page 16 of 34, Bullet 3. The information in this bullet is incorrect. According to Enclosure 1, Table 2, Hazardous Substances and Petroleum Products Stored, Released, or Disposed (last entry on Page 4 of 4) and Enclosure 5, RIA 48 (Navy Exchange UST leak) is located within SPUD-1. Figure 8 shows RIA 48 as 3-13316. This release site location is located within SPUD-1; therefore, the ECP category for SPUD-1 should be corrected to be 2 (not 1, as shown). The text should discuss this release.

Response: Comment noted. The text has been clarified accordingly. As stated in the last bullet describing SPUD-1, and in enclosure (4), the Navy has completed the MCP investigation at the Navy Exchange (NEX) RTN 3-13316] which also addressed RIA 48. A Class A-2 RAO [310 CMR 40.1036(2)] for this site was issued on 15 Jul 98. No AUL was required. Therefore, NFA is required for RIA 48 (EPA and MADEP agreement on the NFA decision in Jan/Feb 02).

26. Subparcel SPUD-1, Page 16 of 34. Bullet 5. Due to the presence of lead dust, the Navy recommends that protective footgear be worn inside Building 113 unless the lead is removed by the new building owner. In addition to protective footgear, protective clothing and respirators should be worn. Occupancy restrictions should be placed on this building until the lead source and lead dust is contained or removed in accordance with applicable laws and regulations.

Response: The EBST text and clause 8(a) in enclosure (2) have been modified to require that protective footwear/clothing are required for users of Building 113 and that respirators are required for any activity that may significantly disturb the lead dust (e.g., renovation workers) unless the lead dust is cleaned up in accordance with federal, state, and local regulations. Building 113 is currently locked/secured by the Navy in order to prevent contact with the lead dust. Therefore, clause 8(a) in enclosure (2) requires that, if the building is opened for use, then a warning sign about the dust from lead-based paint must be put on the entrances to Building 113 unless the lead dust is cleaned up.

Building 113 is the former field house head (men's/women's rooms). The Navy has decommissioned the septic system and secured (locked) the doors. The building has been unused for several years. It is the Navy's understanding that this building may be demolished as part of the base redevelopment.

27. Subparcel SPUD-2, Page 17 of 34. Before the transfer of any subparcel covered by the Draft FOST may occur, the Navy must submit, and EPA and MADEP must approve, the final decision documents for every RIA that is located within a subparcel covered by the Draft FOST.

Response: Comment noted. SPUD-2 contains RIA 42. The Navy issued a final Decision Document for RIAs 42, 46, and 51 in Apr 02. With the 30-day review period, the Navy anticipates receiving regulatory concurrence in May 02.

In general, before the transfer of any subparcel containing an EBS RIA, the Navy will complete final Decision Documents and/or reach NFA agreements with EPA and MADEP on the RIAs located within that FOST subparcel. Decision Documents are not being prepared for each RIA listed in the EBS program. No Decision Documents will be prepared for RIAs that were transferred to other programs or deemed to require NFA during the early stages of the EBS program. As of Feb 02, the Navy, EPA, and MADEP have agreed on NFA for 10 of the 16 RIAs located within the FOST subparcels. The Navy is currently working with EPA and MADEP toward reaching final NFA Decision Documents or NFA agreements as soon as possible for the remaining 6 EBS RIAs contained within the FOST subparcels.

EPA Follow-up Comment of 10 Sep 01: EPA's comments stated that before the transfer of Subparcels OS-R-5 and SPUD-2 may occur, the Navy must submit, and EPA and MADEP must approve, a final decision document for each RIA located within these subparcels. The Navy's responses indicated that the Navy intends to submit final decision documents "and/or reach NFA agreements with EPA and MADEP" on these RIAs. Please note that EPA wants to see final decision documents, not just reach NFA agreements, for the RIAs located within Subparcels OS-R-5 and SPUD-2.

Response: This comment pertains to the draft Response to EPA Comment No. 27 of 24 Sept 01. The above Response has been modified as requested.

28. Subparcel SPUD-2, Page 17 of 34. The text indicates that no buildings are present within subparcel SPUD-2; however, Enclosure (5) states that Building 20 (transient housing) is located within SPUD-2. In addition, the text fails to address the presence of RIA 42, which is prominently shown in subparcel SPUD-2 on Figure 8. RIA-42 consists of buried asbestos-lined pipes located southwest of Building 20. The text associated with subparcel SPUD-2 should be revised accordingly, and AULs should be implemented to prevent the potential future excavation of soil which may expose the asbestos-lined pipes.

Response: A discussion of RIA 42 has been added to the EBST section describing subparcel SPUD-2. However, no buildings are present in subparcel SPUD-2. As shown in Figure 8, Building 20 is located adjacent to SPUD-2. Enclosure (5) indicates that RIA 42 pertains to the buried asbestos-lined pipes in SPUD-2 that are located southwest of Building 20. The description of RIA 42 in enclosure (5) has been clarified to indicate that Building 20 is not located within SPUD-2. With regards to excavation restrictions, an excavation restriction has been added to the property (see Response to EPA EBST Comment No. 18). The Navy issued a final Decision Document for RIAs 42, 46, and 51 in Apr 02. With the 30-day review period, the Navy anticipates receiving regulatory concurrence in May 02.

29. Subparcel SPUD-2, Page 17 of 34, Bullet 2. The reference to Figure 7 should be corrected to Figure 8.

Response: Comment noted. The text has been corrected.

30. Subparcel SPUD-3, Page 17 of 34, Bullet 1. Regarding the proposed 20-foot setback from the Old Swamp River, Figure 9 shows a small northeastern portion of subparcel SPUD-3 that crosses over the Old Swamp River. This figure should be corrected if necessary.

Response: Comment noted. The eastern border of Subparcel SPUD-3 has been corrected to end at the buffer zone west of Old Swamp River. As described in the Response to EPA General Comment No. 6, the buffer zone has been extended to the edge of the wetlands.

31. Subparcel SPUD-3, Page 18 of 34, Bullet 1. The reference to Figure 6 should be corrected to Figure 9. Also, the reference to "no other buildings" being located in this subparcel is not clear because the previous bullet indicated that no buildings were located within this subparcel. The text should be corrected or modified as necessary.

Response: Comment noted. The reference to Figure 6 has been corrected and the word "other" has been deleted.

32. Subparcel SPUD-6, Page 19 of 34, Bullet 4: The fourth bullet states that "no impacts from nearby sites has [sic] been identified for the subparcel." However, one potential impact has been identified, that being discharge of reducing groundwater to the wetland to the southwest of the FFTA (see EPA's letter dated April 5, 2001). Review of the information collected in the Phase II RI for the FFTA suggested that degradation of historic fuel releases from the FFTA may have contributed to reducing conditions of in groundwater flowing to the southwest. Reductive dissolution of iron oxyhydroxide coatings on aquifer materials may release sorbed inorganics, including manganese, which was shown to be elevated in groundwater beneath and downgradient of the FFTA. Upon discharge to surface water and exposure to the oxidizing conditions there, the iron and manganese precipitate again as oxides, and accumulated in the wetland sediment, as evidenced by the iron staining observed. Furthermore, the TACAN Outfall and associated drainage pass through the SPUD-6 parcel, and a sediment removal is being considered for this drainage. The FOST does not acknowledge these possible impacts from adjacent areas.

Response: See Response to EPA General Comment No. 7.

33. Polychlorinated Biphenyls. Pages 20 and 21 of 34. Please clarify whether all potentially PCB-containing fluorescent light ballasts have been removed from all buildings within the 22 subparcels covered by this Draft FOST.

Response: Circa 1994/1995, the Navy completed a program to remove/replace ballasts containing PCBs at NAS South Weymouth. The ballasts were sent to Clean Harbors Environmental Services, Inc. for recycling. The text has been modified to indicate that no PCB-containing ballasts are present.

34. Lead-Based Paint (LBP) in Residential Buildings, Page 29 of 34. As stated, DoD policy does not require lead abatement for buildings that are scheduled for non-residential use. However, it must be ensured that buildings containing lead paint are not transferred in the future for residential occupancy in a manner that conflicts with applicable state and federal laws and regulations. The presence of lead in these buildings should be documented and restrictions should be placed on any future uses that may pose a risk to occupants.

Response: Comment noted. A restriction has been added to clause 8 of enclosure (2) that requires the grantee to assess any potential hazards associated with LBP in any of the buildings included in the FOST that will be reused for residential purposes or for purposes that include children under the age of 6 years.

35. Pesticides, Page 33 of 34: This section minimizes the potential impact of pesticides on the subject parcels, mentioning that "[n]o information is available," "no records of pesticide use prior to 1987 have been found," and "no pesticide/herbicide-related EBS RIAs have been identified." While these observations are true, it might also be noted that pesticide application appears to have been ubiquitous at the facility, and that residual levels of pesticides have been found at many sites that have exceeded screening thresholds. Thus, while it may be unlikely that any of the subparcels designated for transfer have been subject to improper disposal of pesticides, they have almost certainly received routine application of pesticides, and residuals are likely to be present in present-day soils.

Response: The referenced section also indicates the pesticide/herbicide/pest management practices since 1987 are available for review in Table 5-16 of the Phase I EBS

(pp. 90-92 of that document). Plus, the FOST indicates that the Navy acknowledges the use of pesticides at NAS South Weymouth prior to 1987. The last sentence of this section has been modified to state "Although residual concentrations of pesticides/herbicides may be present in soil resulting from the past applications as part of upkeep of NAS South Weymouth, no pesticide/herbicide-related EBS RIAs have been identified within, or have impacted, the subject subparcels of this FOST."

EPA'S COMMENTS ON ENCLOSURE (2)

36. Page 2 of 8, Clause 3. What is meant by "reasonable and appropriate rights of access"? CERCLA Section 120(h)(3) does not qualify the right to access in this way.

Response: The clause provides access for the Navy to transferred property to conduct remedial actions or corrective actions, as necessary. The remainder of Item 3 clarifies that:

"The right of access described herein shall include the right to conduct tests, investigations, and surveys, including, where necessary, drilling, test-pitting, boring, and other similar activities. Such rights shall also include the right to conduct, operate, maintain or undertake any other response or remedial action as required or necessary including, but not limited to, monitoring wells, pumping wells, and treatment facilities. The GRANTEE agrees to comply with activities of the GRANTOR in furtherance of these covenants and will take no action to interfere with future necessary remedial and investigative actions of the GRANTOR. Any such entry, including such activities, responses or remedial actions, shall be coordinated with the GRANTEE or its successors and assigns, and shall be performed in a manner which minimizes (a) any damage to any structures on the subject subparcels and (b) any disruptions of the use and enjoyment of the subject subparcels."

37. Page 2 of 8, Clause 3. EPA suggests use of the following language in place of existing Clause 3:

3. A. The Grantor reserves a perpetual easement over and through and a right of access to the subject subparcels to perform any additional environmental inspection, investigation, monitoring, sampling, testing, remedial action, corrective action or other action (hereinafter collectively "Response Actions")

that are either (1) required by the United States Environmental Protection Agency ("EPA"); (2) required by the Massachusetts Department of Environmental Protection ("MADEP"); (3) necessary to respond to a claim by Grantee; or (4) necessary for the Grantor to fulfill its environmental responsibilities under applicable law. This easement and right of access shall be binding on the Grantee, its successors and assigns, and shall run with the land. This reservation includes the right to access and use utilities on the subject subparcels at reasonable cost to the United States.

B. In exercising this right of access, except in case of imminent endangerment to human health or the environment, the Grantor shall give the Grantee, or the then record owner, reasonable prior written notice of Response Actions to be taken in or on the subject subparcels and shall use reasonable means, without significant additional cost to the Grantor, to avoid and/or minimize interference with the use of the subject subparcels.

C. Subject to the provisions of this Clause 3 (Access) and except as otherwise provided for by applicable law, including, without limitation, Section 330 of the National Defense Authorization Act of 1993, as amended, which rights are expressly reserved by the parties hereunder, the Grantee, the then record owner, and any other person shall have no claim or cause of action against the Grantor or any officer, agent, employee or contractor of the Grantor for interference with the use of the subject subparcels based upon Response Actions taken under this Clause 3 (Access). The Grantor shall not incur liability for any additional Response Action found to be necessary after the date of this conveyance unless the Grantee, its successor or assign, is able to demonstrate that such release or such newly discovered hazardous substance was due to the Grantor's activities, ownership, use or occupation of the Transfer Parcel, or the activities of an officer, agent, employee or contractor of the Grantor.

D. All subsequent transfer, leases, or other conveyances of the subject subparcels shall be made expressly subject to this easement. Upon a determination by the United States, that all remedial action under CERCLA and the Federal Facility Agreement

(FFA) for the South Weymouth Naval Air Station (SOWEY NAS) National Priorities List (NPL) site is completed at the SOWEY NAS NPL site, the Grantor shall execute and record a release of easement.

E. Nothing in any document relating to or affecting the transfer or lease of any of the subject subparcels shall limit or otherwise affect EPA's or MADEP's rights of access and entry to and over any and all portions of the subject subparcels under applicable law for purposes including but not limited to: (a) conducting oversight activities, including but not limited to investigations (such as drillings, test-pitting, borings and data and/or record compilation), sampling, testing, monitoring, verification of data or information submitted to EPA or MADEP, and/or site inspections, in order to monitor the effectiveness of remedial actions, response actions and corrective actions and/or the protectiveness of any remedy which is required by (i) any record of decision ("ROD") (and any amendments thereto) that was approved by the Grantor and EPA and issued by the Grantor pursuant to CERCLA or the SOWEY NAS FFA (and any modifications thereto) before or after the date of conveyance, or (ii) any decision document that was, approved by MADEP and issued by the Grantor under applicable state law before or after the date of conveyance; (b) performing five-year reviews as required by applicable law; and (c) taking response actions.

Response: Comment noted. The text has been changed as requested.

38. Page 5 of 8, Clause 7. This clause indicates the Navy's determination that the historic fill material at the Site "presents no unacceptable risk in its present state and if left undisturbed" (emphasis added). This is significant. By what means did the Navy make this determination (e.g., the EBS process, the RI process)? Does this mean that there will be an unacceptable risk to human health or the environment if the fill material is disturbed? What institutional controls does the Navy plan to implement to ensure that the fill material will be "left undisturbed"? This clause should describe and provide a means for implementing, maintaining and enforcing such controls.

Response: The Navy has completed an extensive basewide study of the conditions across NAS South Weymouth as part of the EBS program. All known AOC are currently being

addressed under the IR, MCP, EBS, or solid waste programs. This standard/template clause is an acknowledgement and notification that much of the land of NAS South Weymouth was reworked during its construction and, therefore, fill material is present in many areas. However, the basewide investigations at NAS South Weymouth have not identified any environmental concerns for these fill areas. Item 7 of enclosure (2) has been rewritten in the Final FOST to be specific for the conditions at NAS South Weymouth as follows:

"7. Presence of Historic Fill Material: The GRANTEE, its successors and assigns are hereby warned and do acknowledge that certain portions of the subparcels subject to this Quit Claim Deed are underlain by fill material resulting from the historic development of the NAS South Weymouth. The fill material may contain rocks, boulders, and other non-hazardous debris such as ash (generated from controlled burn/vegetation reduction during land clearing operations) asphalt, brick, and/or concrete materials. The GRANTEE, by acceptance of this Quit Claim Deed, covenants and agrees, for itself, its successors and assigns, that in its use and occupancy of the subject subparcels, including excavations, will comply with all federal, state, and local laws relating to the constituents of the historic fill material and that the GRANTOR assumes no liability for damages for personal injury, illness, disability or death to the GRANTEE, or to GRANTEE'S successors, assigns, employees, invitees, or any other person, including members of the general public, arising from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with the historic fill material on the subject subparcels, whether the GRANTEE, its successors or assigns, has properly warned or failed to properly warn the individual(s) injured."

39. The following language should be included in Enclosure (2) to address use restrictions that should be implemented to ensure that base cleanup efforts will not be impaired or jeopardized:

The Grantee agrees on behalf of itself and its successors and assigns that except as provided herein, no activity shall be undertaken on the subject subparcels that might impede, interfere with, disrupt or otherwise negatively impact any response action, or jeopardize the protectiveness of any remedy, or interfere with any EPA or MADEP oversight activity, at the SOWEY NAS NPL site unless

the Grantee or such successor or assign proposing to undertake such activity first obtains written approval from the Grantor, EPA and MADEP. Such prohibited activities shall include but not be limited to:

- a) surface application of water that could impact the migration of any contaminated groundwater underlying the subject subparcels.
- b) any disturbance of the surface or subsurface of the subject subparcels in any manner, including but not limited to construction, filling, drilling, excavation or change of topography, that might interfere with, negatively impact, or restrict access for any ongoing response action at the SOWEY NPL NPL site:
- c) any disturbance of the surface or subsurface of the land in any manner, including but not limited to construction, filling, drilling, excavation, or change of topography, that might interfere with, negatively impact, or jeopardize the protectiveness of any remedy at the SOWEY NAS NPL site; and
- d) any activity that might result in disturbance of the mobilization and/or transport of any hazardous substance, hazardous waste, petroleum product or derivative or any other contaminant existing on or emanating from any of the subject subparcels as of the date of conveyance.

Response: The proposed language imposes too many unnecessary restrictions on the property. The Navy has completed, or will complete prior to transfer, the mitigation of environmental impacts identified on the subject subparcels under the MCP and EBS programs. No IR Program sites are located within the subject subparcels of this FOST. As shown in Response to EPA's EBST Comment No. 37, the Navy has agreed to include the recommended language pertaining to a perpetual easement to perform any required future environmental investigations. Therefore, the additional language in this comment (No. 39) has not been added to enclosure (2).

- 40. Page 5 of 8, Clauses 8(a) and 8(f). Protective footwear alone is not sufficiently protective for the presence of lead dust. These clauses should be modified to include protective clothing and respirators.

Response: See Response to EPA's EBST Comment No. 34.

EPA'S COMMENTS ON ENCLOSURE (4)

41. Massachusetts Contingency Plan (MCP) Sites at the Main Base of NAS South Weymouth. The status column of this table generally (with the exception of MCP RTNs 3-13316 and 3-15379) lacks any comment on the status of the groundwater at these petroleum release sites. The column should be expanded to clarify, in all cases, whether the groundwater at these locations meets MCP standards, and whether the groundwater at any downgradient FOST subparcels may be impacted.

Response: Enclosure (4) indicates whether each MCP site has been completed under an RAO. A completed Class A or Class B RAO ensures that impacted media have been addressed. Enclosure (4) has been modified to indicate the classes of the completed RAOs. Enclosure (4) has also been modified to include the status of groundwater data at the remaining active MCP site.

42. EPA has not received decision documents for a number of these RIAs. Also, a number of the Navy's decisions are under discussion by the Navy, EPA, and MADEP; e.g., RIA 2C - further action under CERCLA; RIA 2D - further action under CERCLA; RIA 10A - resampling to occur: RIA 34 - resampling to occur.

Response: Enclosure (4) pertains to MCP sites; therefore, it is assumed that this comment refers to enclosure (5) (EBS RIA summary table).

As previously stated, before the transfer of any subparcel containing an EBS RIA, the Navy will complete final Decision Documents and/or reach NFA agreements with EPA and MADEP on the RIAs located within that FOST subparcel. No Decision Documents will be prepared for RIAs that were transferred to other programs or deemed to require NFA during the early stages of the EBS program. As of Feb 02, the Navy, EPA, and MADEP have agreed on NFA for 10 of the 16 RIAs located within the FOST subparcels. The Navy is currently working with EPA and MADEP toward reaching final NFA Decision Documents or NFA agreements as soon as possible for the remaining 6 EBS RIAs contained within the FOST subparcels.

RIAs 2C, 2D, 10A, and 34 are not located within the FOST subparcels. The Navy has included buffer zones in between ongoing investigation sites and FOST subparcels as needed.

MADEP'S GENERAL COMMENTS

1. Areas that may be suitable for solid waste consolidation should not be transferred until a decision about consolidating solid waste on base property has been reached. The Department is currently reviewing the Navy's evaluation.

Response: This comment will be of consideration during the ongoing landfill consolidation evaluations and property transfer process. As summarized in the Navy's General Response No. 2, the FOST is not the final property transfer document. For purposes of this FOST, areas that may be suitable for a consolidation site can still be considered suitable for transfer.

MADEP'S COMMENTS ON THE MEMORANDUM FOR THE RECORD

1. Item 5: The Department understands that the Navy intends to complete required remedial work at the Review Item Areas (RIAs) located within the FOST parcels prior to transfer. However, the Department cannot concur on the suitability of transfer of any subparcel that includes an RIA that requires additional investigation or remediation. On this basis, the following subparcels (as defined in EBST Figures 2 through 15) are not suitable for transfer because they contain at least one active RIA: B-1W-1 (RIA 55), OS-C-1 (RIAs 53 and 55), OS-A-2 (RIA 100), OS-R-5 (RIAs 7A and 7B), and SPUD-6 (RIA 2D and a recently identified site screening area).

Response: RIAs 53 and 55 are not located within the subject FOST subparcels. The Navy disagrees with the MADEP's interpretation of the extent of RIA 55 (see Response to MADEP EBSL Comment No. 1 on subparcel B-1W-1).

Due to the ongoing work related to RIA 100, subparcel OS-A-2 has been removed from this FOST.

The Navy has completed a final NFA Decision Document for RIA 7B (dated 31 Jan 02). The Navy will complete a NFA Decision Document for RIA 7A prior to transfer. A Draft NFA Decision Document for RIA 7A was issued on Jul 01.

SPUD-6 has been redrawn to exclude RIA 2D (i.e., approximately 0.25 acres have been removed from SPUD-6). No buffer zone is required because the runways have been determined to be CERFA-1 clean and RIA 2D pertains to the adjacent grass-covered area.

See Response to EPA's General Comment No. 7 regarding the identified site screening area in the northern end of subparcel SPUD-6.

MADEP'S COMMENTS ON THE EBSL

Subparcel B-1W-1

1. As defined in Figure 3, this subparcel is not suitable for transfer because it includes part of RIA 55 (defined in Figure 6-21 in the EBS Phase I report), which is currently under investigation.

Response: Disagree. Figure 6-21 of the *Phase I EBS* report defines RIA 55 as the buried/rusted drums north of Trotter Road. As shown in the figures for the Draft Decision Documents for RIAs 55A and 55B of Jan 01 and the FOST figures, the debris areas of these RIAs do not extend into subparcel B-1W-1. The more recently established RIA 55C, as shown in the EBST figures also does not extend into subparcel B-1W-1.

2. A "weed killer" container was observed on the "Perimeter Road Asphalt Pile" (Figure 3) during the April 4, 2001 visual site inspection (VSI), indicating that the area may be a disposal site. Consequently, the potential for a release of oil and hazardous material (OHM) to the surrounding area should be assessed, and, if a release is confirmed, appropriate remedial action should be conducted prior to transfer. In addition, construction and demolition (C&D) debris in this area should be addressed in accordance with 310 CMR 19.000 prior to transfer.

Response: See the Navy's General Response No. 6. This is a simple solid waste issue and the empty container was added to the Navy's inventory of general solid waste debris at the base (see Navy's 19 Oct 01 letter to MADEP). However, there was no evidence of a release of a hazardous substance to the environment, and as shown in recent photos [see Photos 1 and 2 at end of enclosure (6)], there is evidence to the contrary. Lush vegetation was observed in the area of the discarded weed killer container. The Navy does not recommend sampling for this item. As noted in enclosure (7), the Navy has removed the empty container.

3. Scattered solid waste that poses a safety hazard, observed near the southwest corner of this subparcel during the April 4, 2001 VSI (e.g., exposed rebar), should be removed prior to transfer.

Response: See the Navy's General Response No. 6.

4. Abandoned barbed wire in the vicinity of the base perimeter fenceline should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has conducted a removal of abandoned coils of barbed wire around the base.

Subparcel INST-1

1. Building 31:

- The EBS Phase I report (p. 184) indicates that transformers were located in the basement of Building 31. Consequently, the potential presence of PCBs in the basement should be assessed, and, if a release to the environment is confirmed, appropriate remedial action should be conducted prior to transfer.

Response: As stated in the PCB section of the EBST, the EBS RIAs for PCBs at NAS South Weymouth do not include the former transformers that were in the basement of Building 31. No staining from the transformers was noted in the Phase I EBS of 18 Nov 96. Also, a re-inspection conducted in Nov 01 [see Photo 3 at end of enclosure (6)] confirmed that no oil staining is present on the floor. Therefore, NFA is required.

- The indoor air hazard caused by fungus and lead dust on the kitchen floor and basement steps (November 1999 PIH survey report) should be addressed (health hazard).

Response: See Response to EPA's EBST Comment No. 9. Restrictions have been added to clause 8 of enclosure (2) to address the indoor air hazard and the previously detected lead dust in Building 31.

2. Building 46: The debris pile located northwest of the building (p. 184, EBS Phase I report) should be removed (housekeeping).

Response: See the Navy's General Response No. 6.

3. Building 49: Prior to transfer, Mr. John Macauley with the Bureau of Waste Prevention (978-661-7633) should be contacted to determine requirements for management of the asbestos in the crawl space.

Response: In accordance with DoD policy, the Navy is responsible to abate ACMs that are "friable, accessible, and damaged" (FAD). However, the asbestos in the crawlspace of Building 49 is not currently accessible. The crawlspace is not part of the common living area of Building 49 and is currently boarded up with asbestos-warning signs in-place. Therefore, the Navy will not conduct an abatement at this location at this time and the FOST provides notification for the grantee of the condition of ACM at this location. Subsequent to this FOST but prior to transfer, the Navy will implement the DoD policy regarding ACM in accordance with a written statement of facility specific utilization or non-utilization as provided by the Local Reuse Authority (i.e., the SSTTDC).

4. Any onsite septic systems that have been or will be abandoned should be decommissioned in accordance with 310 CM 15.354 (e.g., the EBST indicates that the SSTTDC has listed Building 31 for demolition).

Response: No septic systems are present in INST-1.

Subparcel OS-A-1

1. The utility vault located adjacent to the west side of the lower access road near the northeast corner of this subparcel should be assessed to determine if it contains OHM, and, if OHM is present, appropriate remedial action should be completed prior to transfer.

Response: This utility vault was not identified as a RIA during the basewide EBS program. Based on this comment, the Navy further inspected the vault in Nov 01. The transformer was installed between 1988 and 1995 as shown on NAVFAC drawing 2119871, E-10, 23 of 48 "Repair Electrical System" project # 88-C-0301, 1995 as-built. It is an Atlantic Power Systems Transformer SN #CF0907001 with 107 gallons of oil and no PCB at time of manufacture as stated on identification plate. As shown in Photos 4, 5, and 6 at the end of enclosure (6), there is no visual evidence of a release around the transformer.

2. The following C&D debris should be reused, recycled, or properly disposed in accordance with 310 CMR 19.000 prior to transfer:
 - The "small pile of concrete" located adjacent to the base perimeter fenceline (Figure 5).

- Demolition debris (concrete and lumber) located near the northeast corner of the subparcel (November 29, 2000 VSI).

Response: As clarified with MADEP during Sep 01, the small pile of concrete is not located along the fenceline, but is part of the referenced demolition debris located near the northeast corner of the subparcel. The debris area noted on Figure 5 of the draft EBST is the location of miscellaneous (roadside-like) litter noted during recent site walks. The locations of solid waste debris have been clarified [see enclosure (7)]. See also the Navy's General Response No. 6.

3. Abandoned barbed wire in the vicinity of the base perimeter fenceline should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has completed a removal of abandoned coils of barbed wire around the base.

Subparcel OS-A-2

1. As defined in Figure 6, this subparcel is not suitable for transfer because it includes RIA 100, which is currently under investigation.

Response: Due to the required additional work at RIA 100, subparcel OS-A-2 has been removed from the FOST.

2. C&D debris (SWF3-9, SWF3-10, and SWF3-11 in Figure 6) should be reused, recycled, or disposed in accordance with 310 CMR 19.000 prior to transfer.

Response: Due to the required additional work at RIA 100, subparcel OS-A-2 has been removed from the FOST.

3. Abandoned barbed wire in the vicinity of the base perimeter fenceline should be removed prior to transfer (safety hazard).

Response: Due to the required additional work at RIA 100, subparcel OS-A-2 has been removed from the FOST.

4. Extensive surficial domestic debris located adjacent to the south fenceline (May 3, 2001 VSI) should be removed (housekeeping).

Response: Due to the required additional work at RIA 100, subparcel OS-A-2 has been removed from the FOST.

Subparcel OS-C-1

1. As defined in Figure 7, this subparcel is not suitable for transfer because it includes RIA 52, part of RIA 53 (including the metal debris dump and former antenna clearing located east of Building 133), and part of RIA 55, which are currently under investigation.

Response: The FOST figure indicates that RIA 53 (former radio transmitter building area) is outside of subparcel OS-C-1. See Response to EPA's EBST Comment No. 7 regarding RIA 53.

The Navy will complete the final NFA Decision Document for RIA 52 (north ballfield area) prior to transfer of the property. As noted in enclosure (5), the Navy completed additional sampling at RIA 52, anticipates NFA, and issued a revised Decision Document addendum for regulatory review in Mar 02.

As shown in the *Draft Decision Documents for RIA 55A and 55B* of Jan 01 and the FOST figures, RIA 55 (areas north of Trotter Road) is not located within subparcel OS-C-1 (see Response to MADEP EBSL Comment No. 1 on subparcel B-1W-1). Therefore, it is appropriate to include subparcel OS-C-1 in this FOST.

2. Building 24:
 - The EBS Phase I report (p. 181) indicates that 60 wet cell batteries were located in one of the basements. Consequently, the potential for releases from the batteries to the building interior and floor drains should be assessed, and, if a release to the environment is confirmed, appropriate remedial actions should be conducted prior to transfer.

Response: No releases from the wet cell batteries were identified during the *Phase I EBS* of 18 Nov 96. The Navy has since removed the wet-cell batteries from Building 24. As documented in the *Removal Action Report* of Jan 99, the Navy has cleaned out residual lead in the battery storage area (see Table 1 of the EBST). Therefore, NFA is required.

- Lead dust on the basement floor (November 1999 PIH survey report) should be addressed (health hazard).

Response: See Response to EPA's EBST Comment No. 34.

- Observations during the May 18, 2001 VSI (a concrete pad, scattered rounded brick, and ash) suggest that an abandoned incinerator may be present west of Building 24. Consequently, the potential for a release of hazardous material to the surrounding area should be assessed, and, if a release is confirmed, appropriate remedial action should be conducted prior to transfer.

Response: The Navy has removed this structure and debris and determined that NFA is required. See Response to EPA's EBST Comment No. 15.

- X-ray equipment should be removed and properly disposed prior to transfer (refer to August 2000 Draft FOST).

Response: The x-ray equipment has been removed from Building 24 and is being relocated. The x-ray equipment is no longer within the subparcels of this FOST.

- Rebar protruding from large concrete blocks near the south parking lot (p. 181, Phase I Report) should be removed (safety hazard).

Response: See the Navy's General Response No. 6.

- Any associated onsite septic system should be decommissioned in accordance with 310 CMR 15.354 if it was or will be abandoned (compliance).

Response: Building 24 never had a septic system.

3. Building 25: Abandoned equipment should be removed from the interior of the building (housekeeping).

Response: The Navy has completed two surveys of Building 25 by an industrial hygienist (*Safety and Health Assessment for Buildings 24 and 25* of Jul 00; and an undocumented inspection on 10 Jul 01). No hazards were identified for the remaining equipment/materials in Building 25 (e.g., no biohazards, sharps containers, used medical products, soiled laundry, or filled trash containers are present). Therefore, the equipment will not be removed and will instead be included in the transfer of Building 25.

4. Observations during the April 4, 2001 VSI indicate that the "Perimeter Road Asphalt Pile," identified on Subparcel B-1W-1 (Figure 7), extends southeastward onto Subparcel OS-C-1. As noted previously, a "weed killer" container was observed on the Perimeter Road Asphalt Pile during the VSI indicating that the area may be a disposal site. Consequently, the potential for a release of OHM to the surrounding area should be assessed, and, if a release is confirmed, appropriate remedial action should be conducted prior to transfer. In addition, C&D debris in this area should be addressed in accordance with 310 CMR 19.000 prior to transfer.

Response: See the Navy's General Response No. 6 regarding solid waste. Also see the Response to MADEP's EBSL Comment No. 2 regarding the weed killer container.

5. Utility vaults located east of RIA 53 adjacent to Perimeter Road should be assessed to determine if they contain OHM, and, if OHM is present, to determine and conduct appropriate remedial action prior to transfer.

Response: A release from these utility vaults was not identified during the Phase I EBS. NFA is required.

6. The drum carcass located near the northwest corner of RIA 53 (November 20, 2000 VSI) should be assessed to determine if it contains OHM, and, if OHM is present, to determine and conduct appropriate remedial action prior to transfer.

Response: Similar to Response to MADEP's B1-W-1 Comment No. 2, this is a simple solid waste issue and the empty container has been added to the Navy's inventory of general solid waste debris at the base. See the Navy's General Response No. 6. During the recent visual site inspection, there were no visual signs of release of a hazardous substance to the environment (i.e., no stressed vegetation, no staining). Therefore, the Navy does not recommend sampling for this item. As noted in enclosure (7), the empty drum carcass has been removed.

7. The following C&D debris should be reused, recycled, or properly disposed with 310 CMR 19.000 prior to transfer:
- Asphalt, brick, and concrete located adjacent to the southwest fence bordering the north baseball field (May 18, 2001 VSI).
 - Concrete and brick located on a mound between the south baseball field and Building 24 (May 18, 2001 VSI).

- An asphalt pile located adjacent to the west side of the access road connecting Shea Memorial Drive to Buildings 92, 93, and 94 (November 20, 2000 VSI).

Response: See the Navy's General Response No. 6.

8. RIA 98 (Mass 6 PCB Spill Site): The FOST does not cite the primary records that document the removal activities reported in the EBS Phase I Errata (p. 51).

Response: The FOST cites the *EBS Errata Report of 10 Nov 97*, which states that NFA is required for RIA 98. Additional documentation has been made available at the CSO. The EBS and enclosure (5) indicate that, as of Jan/Feb 02, the Navy, EPA, and MADEP agreed that NFA is required for RIA 98.

9. Information concerning the activities conducted in the former Marine training area located south of Building 141 should be obtained and reviewed to assess whether or not a disposal site is present in the area. In particular, the use(s) of the asphalt and concrete pad areas, the soil piles in these areas, and the bermed area located to the east should be assessed.

Response: This area was evaluated during the *Basewide Phase I EBS* of 18 Nov 96 (as part of "Zone D" in Section 6.4 of the EBS). No EBS RIAs were identified for this area. Therefore, NFA is required.

10. Information concerning the past presence of six magazines in the open area located west of Building 52 should be obtained and reviewed to determine if a disposal site may be present in the area.

Response: This area was evaluated during the *Basewide Phase I EBS* of 18 Nov 96 (see Section 6.1.2.3 of the EBS). The EBS states that "records review, visual surveys, and site interviews did not identify any occurrence of spills or disposal at this location." No EBS RIAs were identified for this area. Therefore, NFA is required for the former magazines.

11. Rebar protruding from the ground adjacent to the western-most pad in the Marine training area should be removed (safety hazard).

Response: See the Navy's General Response No. 6.

12. Scrap wood should be removed from the vicinity of Building 113 (housekeeping).

Response: See the Navy's General Response No. 6. As indicated in enclosure (7), this location is actually in subparcel SPUD-1, not OS-C-1.

Subparcel OS-R-1

1. C&D debris in two areas located on the east side of this subparcel (SWF1-9 and SWF1-10 through 13, Figure 9) should be reused, recycled, or properly disposed in accordance with 310 CMR 19.000 prior to transfer.

Response: See the Navy's General Response No. 6

2. Abandoned barbed wire in the vicinity of the base perimeter fenceline should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has completed a removal of abandoned coils of barbed wire around the base.

Subparcel OS-R-2

1. As defined in Figure 10, this subparcel is not suitable for transfer because it may include a portion of the Small Landfill IR site, which is currently under investigation. In particular, the groundwater sampling that will be conducted to determine whether the site extends onto subparcel OS-R-2 has not been completed, and one of the involved monitoring wells (MW-25) is apparently located on this subparcel. In addition, the figure indicates that the known waste burial area extends to within less than 100 feet of the subparcel boundary. Thus, the portion of the subparcel located closest to the Small Landfill could be involved in the remedy that will be implemented to closeout the site (e.g., access for excavation, landfill cap area, and storm water control structures).

Response: In Mar 02, the Navy and Region I EPA signed a ROD which selected No Action under CERCLA (with groundwater monitoring) for the site. No unacceptable risks to human health or the environment are associated with soil or groundwater at the Small Landfill. Groundwater monitoring is included to verify that the one detected concentration of thallium in groundwater (associated with a slight potential non-cancer human health risk) is not associated

with the Small Landfill. The Navy acknowledges that the site may still require closure under the State's solid waste landfill program. However, the Navy anticipates that the existing FOST buffer zone around the Small Landfill is sufficient for such activities.

2. In addition to stumps, the solid waste area located near the east end of this parcel (SWF1-1, Figure 10) contains C&D debris (asphalt concrete, and lumber) and domestic debris (March 29, 2001 VSI) that should be reused, recycled, or properly disposed in accordance with 310 CMR 19.000 prior to transfer.

Response: See the Navy's General Response No. 6.

3. To prevent a release of OHM to the environment, abandoned primer containers located near the west end of the perimeter fence (March 29, 2001 VSI) should be removed and properly disposed as soon as possible (housekeeping).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has removed the primer cans.

4. Abandoned barbed wire in the vicinity of the base perimeter fenceline should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has completed a removal of abandoned barbed wire coils around the base.

5. A steel cable located near the west end of the base perimeter fence and a vehicle exhaust pipe located adjacent to the north fence road (March 29, 2001 VSI) should be removed (housekeeping).

Response: See the Navy's General Response No. 6 and enclosure (7).

Subparcel OS-R-3

1. As defined in Figure 11, this subparcel is not suitable for transfer because it:
 - Includes a former gasoline station site, located adjacent to the west side of Union Street (April 5 2001 VSI), that has not been assessed.

Response: The extent of RIA 109 depicted in the EBST figures has been redrawn based upon the location of the

background well and the former gas station. Due to the Navy's ongoing investigation of RIA 109, Subparcel OS-R-3 has been redrawn to exclude that site. The portion of Subparcel OS-R-3 to the east of Union Street (extending east to Old Swamp River), which is downgradient of RIA 109, also has been removed from the FOST.

- Includes a ditch, located west of Union Street, which has not been assessed and may have received discharges from catch basins on the East Mat (April 2001 VSI).

Response: The Navy is considering whether further sampling is warranted in this area. Therefore, as noted above, this area has been removed from the FOST.

2. The open rock-lined well located northwest of the Union Street cul-de-sac (April 5, 2001 VSI) should be secured prior to transfer (safety hazard).

Response: The Navy will locate and secure this opening prior to transfer.

3. The two metal debris areas (SWF1-14, Figure 11, and an area identified during the April 4, 2001 VSI) should be removed (safety hazard).

Response: As clarified with MADEP during Sep 01, these are actually the same debris area, not two separate ones. Figure 11 of the draft EBST indicated SWF1-14 in the wrong location. The location of SWF1-14 has been corrected [see enclosure (7)]. As described above, this portion of subparcel OS-R-3 has been removed from the FOST.

4. Abandoned barbed wire in the vicinity of the base perimeter fenceline should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has completed a removal of abandoned barbed wire coils around the base.

5. Discarded metal debris located adjacent to the east base perimeter fence (March 1, 2001 VSI) should be removed (housekeeping).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has removed this debris.

Subparcel OS-R-5

1. As defined in Figure 12, this subparcel is not suitable for transfer because it:
 - Includes RIAs 7A and 7B, which are currently under investigation.

Response: The FOST and its enclosures have been updated to indicate that the Navy issued a final NFA Decision Document for RIA 7B (31 Jan 02). The Navy issued a draft NFA Decision Document for RIA 7A in Jul 01. Before the transfer of the property containing RIA 7A, the Navy will complete the final NFA Decision Document for that site. To date, the EPA has agreed with the NFA decision in their letter of 15 Aug 01 and MADEP has verbally agreed.

- Is not isolated from RIA 6 by a buffer zone.

Response: The FOST and its enclosures have been updated to indicate that the Navy issued a final NFA Decision Document for RIA 6 (sparse vegetation near East Street Gate) in Jan 02. Therefore, no buffer zone is required.

2. Utility boxes on the runway approach light stands and approach light vaults contain power isolation transformers that should be assessed for the presence of PCBs prior to transfer. If PCBs are confirmed to be present, additional assessment may be required to determine whether PCBs have been released to the environment.

Response: As documented in the *PCB-Free Activity Report* of 4 Jan 95, NAS South Weymouth has been "PCB-free" (PCB concentrations less than 50 parts per million) for electrical and hydraulic equipment since 31 Dec 94. Prior to that, since the promulgation of the Toxic Substances Control Act (TSCA, 40 CFR 761) in 1976, NAS South Weymouth Environmental/ Public Works Department personnel have conducted periodic inspections of PCB-containing equipment at the Base. It is the Navy's understanding that these runway lighting power isolation transformers are "solid" electrical units (i.e., wiring only with no liquid coolant). Therefore, no PCBs would have been present. Finally, the Navy has located documentation (available for review at the CSO) indicating that the runway's power isolation transformers were replaced in 1995 when the base's transformers were maintained as PCB-free.

3. Abandoned approach lights, utility boxes, transformers, and stands should be removed prior to transfer and the vaults

should be secured prior to transfer (safety and housekeeping).

Response: The EBST has been modified to indicate the presence of this equipment, which will be transferred to the SSTTDC as-is. The Navy will not remove the infrastructure of NAS South Weymouth for the property transfer. In accordance with BRAC, the Navy will address unacceptable risks to human health or the environment associated with hazardous substances or hazardous wastes. However, these items of infrastructure do not pose such risks.

4. Threaded rod and rebar in concrete located in the west central portion this subparcel (December 13, 2000 VSI) should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6.

5. Abandoned barbed wire in the vicinity of the base perimeter fenceline should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has completed a removal of abandoned barbed wire coils around the base.

6. The solid waste identified on this subparcel (Figure 12) and the coaxial antenna cable located near the northeast corner of this subparcel (May 7, 2001 VSI) should be removed (housekeeping).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), many of the solid waste items in the subparcel have already been removed.

7. Fence posts and buckets located north of RIA 7A and west of RIA 7B (May 7, 2001 VSI) should be removed (housekeeping).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), many of the solid waste items in the subparcel have already been removed.

Subparcel OS-W-1

1. The following areas should be assessed to determine if they contain OHM and, if OHM is present, to determine and conduct appropriate remedial action (including surficial debris removal) prior to transfer:

- Automotive maintenance and repair debris (e.g., oil filters, oil and break fluid containers, transmission parts) discarded adjacent to the parking lot located northwest of Building 32 (March 23, 2001 VSI).

Response: The debris northwest of Building 32 consists mostly of litter thrown over the fence from the adjacent parking lot. The contents of the empty containers were not used or disposed of at this location (they were likely used in the parking lot as part of automotive upkeep/repair). No visual signs of petroleum stains were observed during the 23 Mar 01 sitewalk. Therefore, as agreed during the 29 Aug 01 meeting with MADEP, no assessment is required other than looking for visual indications of a petroleum release as the Navy removes the litter/debris as part of CSO housekeeping activities. As noted in enclosure (7), the Navy has completed the removal of this debris.

- A yellow drum fragment located east of Building 32 (March 23, 2001 VSI).

Response: During the 23 Mar 01 site walk, no staining/sheen, chemical/petroleum odors, or stressed vegetation was observed. Therefore, no further investigation is required and the Navy has included this drum fragment on the solid waste inventory [see the Navy's General Response No. 6 and enclosure (7) of this FOST]. As noted in enclosure (7), the Navy has removed this drum fragment.

2. C&D debris located adjacent to the north base perimeter fenceline (pieces of gray-painted concrete and automotive debris, March 23, 2001 VSI) and debris located in the east central portion of this subparcel (tires and an automotive gas tank, Mar 23, 2001 VSI) should be reused, recycled, or disposed in accordance with 31 CMR 19.000 prior to transfer.

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has removed much of this debris.

3. To prevent a release of OHM to the environment, two small (~1 quart) bottles that appear to contain waste oil (April 23, 2001 VSI), located near north base perimeter fenceline, should be removed (housekeeping).

Response: Comment noted. These bottles appear to have been thrown over the fence onto Navy property. However, in order to prevent a new release to the environment, the Navy

**has removed the bottles that appear to contain waste oil.
See enclosure (7).**

4. Abandoned barbed wire in the vicinity of the base perimeter fenceline should be removed, prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has completed a removal of abandoned barbed wire coils around the base.

Subparcel OS-W-2

1. The following C&D debris should be reused, recycled, or properly disposed in accordance with 310 CMR 19.000 prior to transfer:
 - Two asphalt, brick, and concrete piles (Figure 14).
 - Asphalt, brick, concrete, metal, and fence debris located near Buildings 128, 95, 114, and 127 (March 23, 2001 VSI).
 - Concrete, timber, and glass located south of Building 127 (March 23, 2001 VSI).
 - A roll of roofing felt located near the southeast corner of this parcel (March 23, 2001 VSI).

Response: See the Navy's General Response No. 6 and enclosure (7).

2. Drums containing investigation-derived waste, located near the road intersection in the center of this subparcel (March 23, 2001 VSI), should be removed and properly disposed in accordance with the associated work plan prior to transfer.

Response: Comment noted. The Navy has removed the investigation-derived waste at this location.

3. The pipe identified in Figure 14 (SWF2-9) should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6.

4. Abandoned barbed wire in the vicinity of the base perimeter fenceline should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has completed a removal of abandoned barbed wire coils around the base.

5. As defined in Figure 14, this subparcel does not extend to the east base perimeter fenceline. An additional VSI may be required if the boundary of this subparcel is extended to the east fenceline.

Response: The text has been clarified to state that the FOST subparcel extends to the east property line (each of the FOST subparcels around the perimeter of the base extend to the property line). The maps have been clarified/corrected as feasible from the available electronic information. As part of the property transfer process, the Navy will complete survey legal descriptions of the property being transferred. It is likely that the fenceline in this area is set back a few feet from the actual property line. However, the area immediately beyond the fenceline was readily visible during the completed site walk with MADEP. As noted in General Response No. 6, the Navy is addressing the debris in Subparcel OS-W-2 separately from the FOST. Therefore, as agreed during the 29 Aug 01 meeting with MADEP, another site walk is unnecessary.

Subparcel SPUD-1

1. As defined in Figure 8, this subparcel is not suitable for transfer because it:
 - Includes RIA 78C (UST No. 24), which is an active RIA.
 - Is not isolated from RIA 47 (hydraulic lift in Building 102), which is an active upgradient RIA.

Response: Since the draft FOST, it was determined that the investigation area for RIA 78C (undocumented removal of UST at Building 102) extended into subparcel SPUD-1. Because investigations are ongoing at RIA 78C, the area containing this RIA has been removed from this FOST. No impacts to the remainder of subparcel SPUD-1 have been identified, or are anticipated, from RIA 78C because recently collected soil and groundwater data indicate that NFA is likely to be required.

The Navy is completing final data evaluations to confirm that NFA is required for RIA 47 (hydraulic lifts in Building 102). However, as noted above for RIA 78C and as indicated in EBST Figure 7, the portion of subparcel SPUD-1 nearest to RIA 47 has been removed from the FOST. In addition to the likely NFA recommendation for RIAs 47 and 78C, groundwater flows to the west in this area; therefore,

no impacts to subparcel SPUD-1 are anticipated from RIAs 47 or 78C.

2. Building 97: Prior to transfer, Mr. John Macauley with the Bureau of Waste Prevention (978-661-7633) should be contacted to determine requirements for management of the asbestos in the crawl space.

Response: In accordance with DoD policy, the Navy will abate FAD ACMs prior to transfer. However, the asbestos in the crawlspace of Building 97 is currently not accessible, particularly given restriction clause 8(d) in enclosure (2) of the FOST which requires that only authorized and training personnel wearing PPE enter the crawlspace unless the grantee complete an asbestos abatement in accordance with federal, state, and local regulations. Therefore, the Navy will not conduct an abatement at this location at this time. The FOST provides notification for the Grantee of the condition of ACM at this location. Subsequent to this FOST but prior to transfer, the Navy will implement the DoD policy regarding ACM in accordance with a written statement of facility specific utilization or non-utilization as provided by the Local Reuse Authority (i.e., the SSTTDC).

3. Building 113:
 - Lead dust inside the building should be addressed (health hazard).

Response: See Response to EPA's EBST Comment No. 26.

- Scrap wood should be removed from the vicinity of Building 113 (housekeeping).

Response: See the Navy's General Response No. 6.

Subparcel SPUD-3

1. Observations during the March 1, 2001 VSI indicate electrical components, including power isolation transformers, are buried in the vicinity of Building 101. In addition, an active seep was observed on Subparcel SPUD-3 approximately 120 feet east of Building 101 (adjacent to the nearby ditch). Consequently, the potential for a release of OHM in the area surrounding, Building 101, including the seep, should be assessed, and, if a release is confirmed on Subparcel SPUD-3, appropriate remedial action should be conducted prior to transfer. In addition, C&D debris in this area should be addressed in accordance with 310 CMR 19.000 prior to transfer.

Response: Building 101 is not included in this FOST. The Navy is investigating the potential release of PCBs from the storage of electrical equipment under EBS RIA 95A through the Various Removal Action program (ongoing). Due to the ongoing investigation of this area, the buffer zone around Building 101 has been expanded to include the drainage ditch between Building 101 and Old Swamp River (i.e., the area downstream of the Building/seep location).

See the Navy's General Response No. 6 regarding C&D debris.

2. C&D debris located on the north side of this subparcel SWF1-10 through 13, Figure 9) should be reused, recycled, or properly disposed in accordance with 310 CMR 19.000 prior to transfer.

Response: See the Navy's General Response No. 6.

3. Utility boxes on the runway approach light vaults apparently contain power isolation transformers that should be assessed for the presence of PCBs prior to transfer. If PCBs are confirmed, additional assessment may be required to determine whether PCBs have been released to the environment.

Response: Disagree. See Response to MADEP EBST Comment No. 2 on subparcel OS-R-5.

4. The abandoned approach lights, utility boxes, transformers, and stands should be removed, and the approach light vaults should be secured prior to transfer (safety and housekeeping).

Response: Disagree. See Response to MADEP EBST Comment No. 3 on subparcel OS-R-5.

5. The abandoned aircraft ceiling detector equipment should be removed prior to transfer (safety hazard).

Response: In accordance with BRAC, the Navy will not be removing infrastructure or equipment as part of the property transfer process. Unless there is a documented release of hazardous substances to the environment associated with the equipment (no such release was identified during the Phase I EBS and no visual evidence of a release was noted during the recent site walks), such equipment will be included in the transfer of property to SSTTDC.

6. Surficial solid waste located adjacent to Old Swamp River (a tire and sonobuoy tube) should be removed prior to transfer (housekeeping).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the tire and sonar buoy tube has been removed.

Subparcel SPUD-4

1. Utility boxes on the runway approach light stands contain power isolation transformers that should be assessed for the presence of PCBs prior to transfer. If PCBs are confirmed, additional assessment may be required to determine whether PCBs have been released to the environment.

Response: Disagree. See Response to MADEP EBST Comment No. 2 on subparcel OS-R-5.

2. The abandoned approach lights, utility boxes, transformers, and stands should be removed prior to transfer (safety and housekeeping).

Response: Disagree. See Response to MADEP EBST Comment No. 3 on subparcel OS-R-5.

3. C&D debris in the two areas located on the east side of this subparcel (SWF1-2, Figure 10) should be reused, recycled, or properly disposed in accordance with 310 CMR 19.000 prior to transfer.

Response: See the Navy's General Response No. 6.

4. Abandoned barbed wire in the vicinity of the base perimeter fenceline should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has completed a removal of abandoned barbed wire coils around the base.

5. The cut-off, concrete-encased fence posts observed outside the east perimeter fenceline (March 29, 2001 VSI) should be recovered and properly disposed (safety hazard).

Response: See the Navy's General Response No. 6.

6. SWF1-7 (5-gallon drum) and a nearby steel cable (March 29, 2001 VSI) should be removed (housekeeping).

Response: See the Navy's General Response No. 6. Note that, as stated in the FOST, the Navy has already removed SWF1-7.

Subparcel SPUD-5

1. C&D debris (asphalt and concrete) piled in the woods along the southern boundary of this subparcel (May 3, 2001 VSI) should be reused, recycled, or properly disposed in accordance with 310 CMR 19.000 prior to transfer.

Response: See the Navy's General Response No. 6.

Subparcel SPUD-6

1. As defined in Figure 15, this subparcel is not suitable for transfer because it:
 - Includes part of RIA 2D, which is currently under investigation.

Response: Subparcel SPUD-6 has been redrawn to exclude RIA 2D (i.e., approximately 0.25 acres of SPUD-6 removed from FOST). No buffer zone is required; the runways have been determined to be CERFA-1 clean and RIA 2D pertains to the adjacent grass-covered area.

- Includes a new site screening area, recently identified by EPA (April 5, 2001 letter), located in the ditch west of the FFTA site.

Response: See Response to EPA General Comment No. 7.

2. The antifreeze vault associated with the aircraft arresting system, located adjacent to runway 17-35 (April 5, 2001 VSI, should be assessed to determine if it contains OHM, and, if OHM is present, appropriate remedial action should be completed prior to transfer.

Response: The vault itself was not filled with antifreeze. The vault was the concrete foundation for a sealed housing (containing antifreeze) for the arresting gear clutch mechanism. The Navy has removed the arresting-gear housing with residual antifreeze and properly disposed of it off-site. The concrete vault holding the arresting-gear housing (clutch/brake mechanism) was pumped free of liquid,

inspected for cracks and leaks (there were none) and backfilled to grade.

3. Utility vaults and wells associated with runway and taxiway lights contain power isolation transformers that should be assessed for the presence of PCBs prior to transfer. If PCBs are confirmed, additional assessment may be required to determine whether or not PCBs have been released to the environment.

Response: Disagree. See Response to MADEP EBST Comment No. 2 on subparcel OS-R-5.

4. Abandoned runway and taxiway lighting transformers should be removed prior to transfer and the runway and taxiway light vaults and wells should be secured prior to transfer (safety and housekeeping).

Response: Disagree. See Response to MADEP EBST Comment No. 3 on subparcel OS-R-5.

5. The abandoned electrical utilities associated with previously removed wind speed- and direction-monitoring equipment (May 3, 2001 VSI) should be removed prior to transfer (safety hazard).

Response: The Navy will not be removing infrastructure or equipment as part of the property transfer process. Unless there is a documented release of hazardous substances to the environment associated with the equipment (no such release was identified during the *Phase I EBS*), such equipment will be included in the transfer of property to SSTTDC.

6. The steel aircraft arresting cable located adjacent to the west side of Taxiway C (April 5, 2001 VSI) should be removed (housekeeping).

Response: The portion of the runway triangle that includes this location is no longer included in the FOST (see Response to EPA's General Comment No. 7). Also, see the Navy's General Response No. 6.

Subparcel SPUD-7

1. Exposed rebar on the east bank of French Stream (December 13, 2000 VSI) should be removed prior to transfer (safety hazard).

Response: See the Navy's General Response No. 6.

2. Surficial steel cable (December 13, 2000 VSI) should be removed (housekeeping).

Response: See the Navy's General Response No. 6.

Subparcel SR-R

1. Abandoned barbed wire in the vicinity of the base perimeter fenceline and an exposed steel rod (guy wire anchor?) located near the southern boundary of this subparcel (March 1, 2001 VSI) should be removed prior to transfer (safety hazards).

Response: See the Navy's General Response No. 6. As noted in enclosure (7), the Navy has completed a removal of abandoned barbed wire coils around the base. The Navy has also removed the exposed steel rod.

2. Fence debris near the Oregon Street gate and drainage pipes, located near the south side of this subparcel (March 1, 2001 VSI) should be removed (housekeeping).

Response: See the Navy's General Response No. 6 and enclosure (7).

PCBs

1. As noted in preceding sections, power isolation transformers were observed on subparcels OS-R-5, SPUD-3, SPUD-4, and SPUD-6. These transformers should be assessed for the presence of PCBs prior to transfer. If PCBs are confirmed to be present, the transformers should be removed and properly disposed, and additional assessment may be required to determine whether PCBs have been released to the environment.

Response: See the Response to MADEP's Comment No. 2 on subparcel OS-R-5.

2. Please include a citation supporting the assertion that "no PCB contamination has been identified in the Building 24 basement."

Response: The FOST has been modified to state that, in addition to the *PCB-Free Activity Report* surveys (see above) no PCB-related review items were identified for the Building 24 basement during the *Phase I EBS*.

EBS Review Item Areas

1. Subparcels containing the following RIAs will not be suitable for transfer until associated decision documents and follow-up response actions are completed: RIAs 2D, 7A, 7B, 52, 53, 55, 76, and 100.

Response: Before the transfer of any subparcel containing an EBS RIA, the Navy will complete final Decision Documents and/or reach NFA agreements with EPA and MADEP on the RIAs located within that FOST subparcel. With respect to this comment, this pertains to RIAs 7A, 7B, and 52. The FOST and its enclosures have been updated to indicate that the Navy has completed a final NFA Decision Document for RIA 7B (31 Jan 02). RIAs 2D, 53, and 55 are not located in a FOST subparcel. See the Navy's General Response No. 6 regarding RIA 76. As previously stated in the Responses to EPA and MADEP comments, subparcel OS-A-2 has been removed from the FOST, due to the required additional work at RIA 100.

Above-ground Storage Tanks (ASTs) and USTs

1. This section indicates that UST No. 13, a 550-gallon UST, was removed from Building 49. However, Table 1 indicates that UST No. 13 is an active 350-gallon tank. Please clarify.

Response: Table 1 has been corrected to indicate that UST No. 13 was a 550-gallon tank that has been removed, as documented in the *BRAC Cleanup Plan* of Aug 98. A 330-gallon AST was installed as a replacement to store heating oil for Building 49.

Radiological Materials

1. The x-ray equipment in Building 24 should be removed and properly disposed (refer to August 2000 draft FOST).

Response: The x-ray equipment has been removed and relocated outside of the subparcels of this FOST.

Figures

1. Figure 3: Subparcel B-1W-1 should be highlighted in yellow.

Response: See Response to EPA's General Comment No. 11.

2. Figure 7: Subparcel OS-C-1 should be highlighted in yellow; subparcel B-1W-1 should not be highlighted.

Response: See Response to EPA's General Comment No. 11.

3. Figure 9: The label for the larger solid waste area should be corrected to identify SWF1-10, 11, 12, and 13.

Response: Comment noted. The figure depicting these debris areas [now presented in enclosure (7)] has been changed as requested.

Table 1

1. Please include a title.

Response: Comment noted. Table 1 has been named "Summary of the History and Environmental Condition of Property".

2. The Department cannot concur with the assignment of ECP Category 1 (and the implicit assumption of suitability for transfer) to any subparcel that has not been addressed as described herein.

Response: See the Responses to the Specific Comments for each subparcel regarding the suitability to transfer. Some subparcels have been removed or modified in the FOST in order to maintain a suitable ECP category for transfer.

MADEP'S COMMENTS ON ENCLOSURE (2)

1. Item 8 (miscellaneous site-specific causes):
 - Clauses (e) and (f), which are apparently intended to minimize lessee/sublessee exposures to conditions in Buildings 24 and 98, are not appropriate because the FOST is intended to support a permanent transfer of property, rather than a temporary lease of property. To ensure that the property is suitable for transfer at the time of transfer, the Navy should correct these conditions prior to transfer.

Response: Clauses 8(e) and 8(f) have been modified to support the FOST. The fungal growth in the basement of Building 24 has been mitigated by the current sublessee. Clause 8(e) of enclosure (2) restricts access to the first floor pump room in Building 24. As stated in the Response to EPA's EBST Comment No. 34, clause 8(h) of enclosure (2) requires the grantee to assess any potential hazards associated with LBP in any of the buildings included in the

FOST that will be reused for residential purposes or for purposes that include children under the age of 6 years.

- A clause should be added to explicitly identify RIAs 42, 46, and 51, as containing buried asbestos pipe. In addition, prior to transfer, Mr. John Macauley with the Bureau of Waste Prevention (978-661-7633) should be contacted to determine requirements for management of the asbestos buried at these RIAs.

Response: Clause 8(g) of enclosure (2) specifically identifies RIAs 42 and 51. Buried asbestos pipe was not identified at RIA 46. As summarized in enclosure (5), NFA is required for RIA 46.

SSTTDC'S GENERAL COMMENTS FROM 17 MAY 01

1. While no Installation Restoration (CERCLA) or active MCP sites are located inside the FOST subparcels, and there are no "identified impacts to the subject sub-parcels of this FOST from the IR program sites or the remaining active MCP sites at NAS South Weymouth," there are outstanding questions regarding downgradient impacts from certain sites, including the Environmental Baseline Survey (EBS) Review Item Areas (RIAs). The term "set back a sufficient distance from the remaining active EBS RIAs" as is used on page 16 of 34, in the discussion on sub-parcel OS-W-2, does not include the definition of "sufficient distance."

Response: See Responses to EPA's General Comment Nos. 1 and 3.

2. While SSTTDC understands that the parcels to be transferred shall be transferred in an uncontaminated state according to the Community Environmental Response Facilitation Act (CERFA), areas of unconsolidated solid waste, that may be considered an Open Dump or Dumping Ground (under 310 CMR 19.014) still exist on site, and have not yet been addressed with regard to the Commonwealth's Solid Waste Regulations.

Response: See the Navy's General Response No. 6.

3. There are 12 Review Item Areas (RIAs) located within the sub-parcels of this FOST. The Navy has proposed No Further Action (NFA) for these sites, and anticipates that "all required work will be completed prior to the transfer of the property." Three points have not yet been addressed:

- a. The regulators have not concurred on the NFAs for these sites.
- b. There are no work plans nor timetables for the "required work" included in the FOST document.
- c. RIAs that will be addressed as maintenance issues (e.g., RIA 39H) do not have work plans or schedules attached.

Response: Before the transfer of any subparcel containing an EBS RIA, the Navy will complete final Decision Documents and/or reach NFA agreements with EPA and MADEP on the RIA(s) located within that FOST subparcel. No Decision Documents will be prepared for RIAs that were transferred to other programs or deemed to require NFA during the early stages of the EBS program. As of Feb 02, the Navy, EPA, and

MADEP have agreed on NFA for 10 of the 16 RIAs located within the FOST subparcels. The Navy is currently working with EPA and MADEP toward reaching final NFA Decision Documents or NFA agreements as soon as possible for the remaining 6 EBS RIAs contained within the FOST subparcels.

Work plans and timetables for completing EBS RIAs are not required to be included in the FOST. The FOST document is a determination based on the existing condition of the property and also identifies what remains to be done (or what restrictions are required) prior to transfer. However, the Navy can discuss schedules and priorities for the RIAs with SSTTDC at anytime.

4. There appears to be a difference in the number of acres of the FOST sub-parcels from the text to Table 1. What is the exact number of acres, 607 or 625?

Response: Comment noted. The acreages cited in the FOST have been revised.

5. The inclusion of solid waste in the FOST sub-parcels in an "evaluation under the solid waste program prior to property transfer" does not address a final resolution of solid waste on the FOST sub-parcels. Exactly, what is the Navy's Solid Waste Program, and how does Section 7 of the Environment Covenants, Historical Fill, relate to the Solid Waste Program? At a minimum, the Solid Waste Program needs to be defined and identified debris needs to be completely characterized.

Response: See the Navy's General Response No. 6 regarding the Navy's solid waste program at NAS South Weymouth. See Response to EPA's EBST Comment No. 38 regarding historic fill at NAS South Weymouth.

The solid waste debris areas/items identified within the FOST subparcels have been described and located in enclosure (7) of the FOST. An inventory of the solid waste debris within the FOST subparcels was generated from the Navy's previous work under the solid waste program and from the recent site walks with MADEP and EPA that were also occasionally attended by SSTTDC personnel. As noted in enclosure (7), the Navy has already removed many of the solid waste debris items.

6. Figures do not reflect details found in the text. As an example, Figures 9 and 10 do not show 20-foot set back from the Old Swamp River, and Figure 10 does not show the

75 foot Rockland Open Space Parcel continuing both east and west of the location of SWF1-4, 5, and 6.

Response: Comment noted. The figures have been revised to show the 20-ft setback of FOST subparcels from French Stream. As noted in the Response to EPA General Comment No. 6, a larger buffer zone has been included for Old Swamp River. The figures have also been revised to indicate the 75-ft width of the Rockland Open Space parcel along the southeast fenceline of the eastern property extension of the base.

7. Figures do not reflect the entire parcels; e.g., Figure 9 and the SPUD-3 subparcel. Figure color-coding is not consistent. Figures require town boundaries.

Response: Comment noted. The EBST figures have been modified to fit entire subparcels, use consistent color-coding (see Response to EPA's General Comment No. 11), and to include town boundaries.

8. There is no reuse zoning that is "Special Use Designation" as is found on page 17 of 34, in the discussion on sub-parcel SPUD-2. The designation is Special Planned Use District.

Response: Comment noted. The definition of "SPUD" in the FOST has been revised.

9. The emergency communications center for Plymouth Nuclear Power Plant is not in current use (Page 12/15, Table 1).

Response: Comment noted. The FOST has been modified to indicate that the emergency communications center has not been used since the mid-1990s.

SSTTDC'S COMMENTS ON THE MEMORANDUM FROM 17 MAY 01

1. Pages 2 and 3 - Table 1. Several of the subparcel acreages noted in the last column of Table 1 do not match those acreages listed in the text portion of enclosure 1. In particular, subparcels OS-A-1, OS-C-2, OS-R-3, OS-R-4, SPUD-1 through 4, SPUD-6, and SR-W-1 contain acreages that do not match. The total acreage for the FOST subparcels is approximately 625 acres (versus 607.7 from Table 1 figures) based upon the numbers listed in the text of enclosure 1.

Response: Comment noted. The acreages cited in the FOST have been revised.

SSTTDC'S COMMENTS ON THE EBST FROM 17 MAY 01

1. Pages 1 and 2 - Table 1. See comment #1 for the Memorandum for the Record.

Response: Comment noted. The acreages cited in the FOST have been revised.

2. Page 7, Subparcel B-1W-1, second bullet. SSTTDC disagrees that the "conditions at RIA-53 are unlikely to adversely impact subparcel B-1W-1 because ... potentially impacted groundwater or surface water from the area of RIA-53 does not enter subparcel B-1W-1."

Based upon Figure 1 of the Draft Phase II Decision Document for RIA-53 (January 11, 2001) groundwater flows south at RIA-53. Based upon the groundwater elevation contours at the site, the flow may have a slight westerly component too. Since a data gap in groundwater flow direction between RIA-53 and subparcels B-1W-1 and OS-C-1 exists, there is a potential for contaminants from RIA-53 to impact each of these parcels. The SSTTDC concurs with the EPA on this matter. As stated in the EPA's comments of March 7, 2001 pertaining to the Navy's Draft Work Plan for RIA-53 (dated Feb 19, 2001) the EPA has the following concerns pertaining to RIA-53:

- A data gap in the sampling coverage of ground water downgradient from RIA-53 still exists - VOCs may have been transported to ground water.
- At least 3 productive downgradient wells should be installed if the Navy wants to use data for a Human Health Risk Assessment.
- At the conclusion of the investigation data must exist to support a Human Health Risk Assessment and an Ecological Risk Assessment.
- The Navy should assess the extent of contamination into the wetlands at the south edge of the site and the work plan should include sampling in this area.

Response: The Navy conducted further investigation of RIA 53 during the 2001 Phase II EBS mobilization No. 1 ("Mobe 1" which began in May 01) and "Mobe 2" (Aug 01). During Mobe 1, two additional wells were installed and the piezometers and wells were re-surveyed. Groundwater flow

on 16 Jun 01 was shown to be to the north and west, toward the stream that flows west and south. To the south, the site is surrounded by wetland. VOCs were not reported at elevated concentrations in soil or groundwater. Metals, PAHs, and petroleum products have been detected although evidence of a major release has not been found. The Navy's investigation continues at RIA 53; however, the current data do not suggest that the site chemicals of concern (COCs) would impact subparcels OS-C-1 or B1-W-1. Data will be adequate to support a Human Health Risk Assessment (HHRA) and an ecological risk assessment. Additional surface water and sediment samples are planned. The new data for RIA 53 were discussed at the 13 Dec 01 Restoration Advisory Board (RAB) meeting.

3. Page 7, Subparcel B-1W-1, last bullet. How will the Navy evaluate the surficial debris (asphalt pile along perimeter road)? What types of sampling will occur? What is the Navy's estimated time frame for addressing/removing this area of solid waste.

Response: See the Navy's General Response No. 6.

4. P. 8, Subparcel OS-A-1, fourth bullet. This item states that the surface debris is north of building 134. Please show building 134 on Figure 5 and list this building number under the first bullet for this subparcel. Also on Figure 5, please show the location where the general household trash is along the fenceline/property line. What is the approximate quantity of household trash along the fenceline? Has the Navy received correspondence from the regulators stating that No Further Action for the surface debris within this subparcel is acceptable?

Response: Comment noted. Building 134 has been labeled on the EBST figure for subparcel OS-A-1. However, Building 134 is not listed in the first bulleted description of subparcel OS-A-1 because it is not located within the subparcel (the wooded area to the north of Building 134 is within the subparcel). Solid waste debris areas have been described and located in enclosure (7) of the FOST. See also the Navy's General Response No. 6.

- 5a. Page 8, Subparcel OS-A-1, last bullet. The Navy states that the only site within 200' of this subparcel is RIA-62 (French Stream). Based upon referring to Figure 5 and supporting data in enclosures 3, 4, and 5; the following sites are also located within 200' of this subparcel and a discussion of each site should be included here: RIA-4a,

RIA-4b, MCP site 3-13224, and IR site #5 (Tile Leach Field). It also appears that a portion of RIA-4a is located on the subparcel. Please revise Figure 5 to show otherwise or mention that RIA-4a is partially on the subparcel.

Response: RIA 4A, RIA 4B, MCP RTN 4-13224, and IR Site 5 have been added to the description of sites within 200 ft of subparcel OS-A-1. Enclosure (5) has been revised to state that RIA 4B is located over 130 ft away from Subparcel OS-A-1.

Due to the ongoing work at RIA 4A, Subparcel OS-A-1 has been redrawn to include a 100 ft buffer zone around RIA 4A. The Navy believes this buffer zone to be adequate to support the ongoing investigation and to be protective of users of subparcel OS-A-1 because the concerns at RIA 4A are limited to manganese concentrations in groundwater above benchmarks (likely due to background conditions) and low arsenic concentrations in soil (not likely to migrate to Subparcel OS-A-1).

The Navy's further investigation of RIA 4A will address the wetlands west of the septic mound and groundwater directly under the mound. While there may be some mounding and local flow to the wetland at this location, flow appears to be predominantly to the southeast. This portion of Subparcel OS-A-1 is predominantly wetland. Based on the locations and levels of analytes detected, the extended buffer zone is sufficient to address concerns about the potential impacts to Subparcel OS-A-1.

- 5b. Should a larger buffer zone (currently 20') between this subparcel and RIA-62, French Stream, be used until the regulators are convinced that the extent of RIA-62 is limited to the immediate vicinity of the stream itself-based upon future Phase II EBS sample results?

Response: The concern at RIA 62 pertains to past releases to the stream that may have adversely affected surface water and sediment quality. Both environmental media are limited to the immediate stream area; therefore, the Navy believes the 20 ft buffer zone to be sufficient for transfer of the abutting subparcels and to support the Navy's watershed analysis and resolution of RIA 62.

- 5c. SSTTDC understands that the Navy plans to re-sample RIA-4b in July of 2001. SSTTDC looks forward to new sample results and hopes that enough data will be available to

determine if RIA-4b poses any risk to human health or the environment. If the Navy does not collect another round of water elevations at and near the site during the upcoming sampling round to determine if the direction of groundwater flow changes throughout the year. Previous groundwater sampling occurred in the months of December (1998) and January (1999). A southwesterly groundwater flow direction from RIA-4b could bring lead contamination into subparcel OS-A-1.

Response: Groundwater investigated as part of RIA 4B is not likely to impact subparcel OS-A-1. The sample that contained 1 part per billion of lead above the "at the tap" drinking water standard was taken on the opposite side of French Stream from a well that is downgradient of the Tile Leach Field (IR Program Site 5). The well will be re-sampled to verify the reported lead level. Lead (although sometimes present in soil at elevated concentrations) has not been seen to migrate in groundwater at NAS South Weymouth.

6. Page 8, Subparcel OS-A-2. This subparcel is designated ECP category 1 here; however, Table 1 of enclosure 1 lists this subparcel as ECP category 5. Please clarify.

Response: Due to the required additional work at RIA 100, Subparcel OS-A-2 has been removed from the FOST. The ECP category will be re-evaluated at a later date.

7. Page 9, Subparcel OS-A-2, first bullet. What is the Navy's estimated time frame for additional sampling, performing the removal action and subsequent closure of RIA-100 within this subparcel. Please note that a discussion of potential vernal pools at and near RIA-100 should be part of future work plans, etc. for RIA-100 (per EPA comments of March 27, 2001 on the Navy's Draft Decision Document for RIA-100 dated February 27, 2001).

Response: Due to the required additional work at RIA 100, Subparcel OS-A-2 has been removed from the FOST. The schedule for RIA 100 will be discussed separately from this FOST.

8. Page 9, Subparcel OS-A-2, second bullet. See comment 5b.

Response: Due to the required additional work at RIA 100, Subparcel OS-A-2 has been removed from the FOST.

9. Page 9, Subparcel OS-A-2, last bullet. What is the approximate volume of surficial debris located within this subparcel? What is the next step for these areas of debris under the NAS solid waste program?

Response: Due to the required additional work at RIA 100, Subparcel OS-A-2 has been removed from the FOST. The work for RIA 100 will be discussed separately from this FOST.

10. Page 9, Subparcel OS-C-1. The text does not mention the areas of solid waste in the northwest section of this subparcel. Please mention these areas. What is the approximate volume of surficial debris in this subparcel, and what is the next step for these areas of debris under the NAS solid waste program?

Response: The debris areas have been described and located in enclosure (7). See the Navy's General Response No. 6.

11. Page 9, Subparcel OS-C-1, third bullet. What is the Navy's estimated time frame for closure of these RIA's? This subparcel is located within the first section of the NAS that is scheduled for development; therefore the SSTTDC is especially concerned with closure of these RIAs. Has the Navy re-sampled the ground water at RIA-52? If the groundwater was not re-sampled in April 2001, please revise the table in enclosure 5 with the anticipated sampling time.

Response: Comment noted. The Navy is prioritizing environmental investigations in the northwest quadrant of the base due to the SSTTDC's schedule for the Phase I development. The status of the environmental sites presented in the Memorandum, EBST, and enclosures (3), (4), and (5) have been updated for the final FOST.

The well at RIA 52 (north ballfield area) was dry during the Spring 2001 sampling event. The Navy has since installed and sampled a new well. The Navy issued a revised Decision Document addendum in Mar 02 and anticipates receiving concurrence on NFA soon.

As of Jan 02, EBS RIA 43 (Building 24 fill pipes), RIA 44 (Building 98 soot), and RIA 98 ("Mass 6" site) were given final designation for NFA with concurrence by EPA and MADEP in Feb 02. The Navy issued a final NFA Decision Document for RIA 51 (Building 141 asbestos-lined pipes) in Apr 02 and with the 30-day review period, is anticipating regulatory concurrence in May 02.

12. Page 9, Subparcel OS-C-1, last bullet. See comment 2 pertaining to potential impacts to this subparcel from RIA-53.

Response: See Response to SSTTDC Comment No. 2.

13. Page 12, Subparcel OS-C-2, last bullet. The text notes that RIA-30B has additional work to be completed under the MCP program. Should not this sentence state that work under the EBS program is forth-coming for RIA-30B? Please label RIA-30B on Figure 8.

Response: Comment noted. The sentence has been revised to state "Although investigations are is ongoing at RIA 30B, potential impacts to the subparcel are unlikely because OS-C-2 is located upgradient of this area."

RIA 30B has been labeled on the EBST figure for OS-C-2.

It is likely that RIAs 30A and 30B will be addressed under the IR program for Hangar 2.

14. Page 12, Subparcel OS-R-1, first bullet. The eastern boundary of this subparcel is not clearly marked on Figure 9.

Response: The figure for subparcel OS-R-1 has been modified to clearly demarcate the eastern boundary of the subparcel set back from Old Swamp River.

15. Page 12, Subparcel OS-R-1, third bullet. Are the regulators satisfied that any potential impacts associated with RIA-104 are likely to be limited to the immediate area of the river? What additional sampling is planned for RIA-104, and has this work been discussed with regulators yet?

Response: The concern at RIA 104 pertains to past releases to the stream that may have adversely affected surface water and sediment quality. Both environmental media are limited to the immediate stream area; however, as described in the Response to EPA's General Comment No. 6, the buffer zone around Old Swamp River has been increased to include the abutting wetland area. The Navy's investigation of RIA 104 is currently on-hold due to the prioritization of other EBS RIAs.

16. Page 12, Subparcel OS-R-1, last bullet. See comment #9.

Response: The solid waste debris areas have been described and located in enclosure (7). See the Navy's General Response No. 6.

17. Page 12, Subparcel OS-R-2, first bullet. The western boundary of this subparcel is not clearly marked on Figure 10.

Response: Comment noted. The EBST figure for subparcel OS-R-2 has been modified to clearly indicate the western boundary of the subparcel set back from Old Swamp River.

18. Page 12, Subparcel OS-R-2, third bullet. See comment #15.

Response: See Response to SSTTDC Comment No. 15.

19. Page 13, Subparcel OS-R-2, last bullet. See comment #9.

Response: The solid waste debris areas have been described and located in enclosure (7). See the Navy's General Response No. 6.

20. Page 13, Subparcel OS-R-3, first bullet. The subparcel boundary along the Old Swamp River is not clearly marked on Figure 11.

Response: See Response to MADEP's EBST Comment No. 1 on subparcel OS-R-3. The eastern boundary of subparcel OS-R-3 has been moved to the west of Union Street. The EBST figure for subparcel OS-R-3 has been modified accordingly.

21. Page 13, Subparcel OS-R-3, third bullet. Add RIA-104 as one of those sites within 200 ft of this subparcel. See comment 15 pertaining to references for RIA-104.

Response: RIA 104 is no longer within 200 ft of the redrawn subparcel OS-R-3. See Response to MADEP's EBST Comment No. 1 on subparcel OS-R-3.

22. Page 13, Subparcel OS-R-3, last bullet. See comment #9.

Response: The solid waste debris areas have been described and located in enclosure (7). See the Navy's General Response No. 6.

- 23a. Page 13, Subparcel OS-R-4, first bullet. The western boundary of this subparcel is not clear in Figure 10. It appears that the Old Swamp River is part of the subparcel.

Response: Comment noted. The EBST figure for subparcel OS-R-4 has been modified to indicate that the western boundary of the subparcel is set back from Old Swamp River.

- 23b. Page 13, Subparcel OS-R-4, first bullet. Does this subparcel include the far eastern sliver of property at the NAS? Should not the southwestern portion of this sliver (west of SWF-1, 4, 5, and 6) merge into OS-R-4 similar to the NAS zoning map?

Response: The revised extent of Subparcel OS-R-4 includes the 75 ft width of the Rockland Open Space zoned parcel along the south and east fenceline at the end of the eastern property extension of NAS South Weymouth. The figure for OS-R-4 has been clarified.

- 24a. Page 14, Subparcel OS-R-4, third bullet. To what extent has the northeast rubble disposal area been sampled? Does this area of debris contain similar materials, as those found at IR site #2 — are there concerns relating to PCBs?

Response: The Navy completed a final *Phase II RI* for the Rubble Disposal Area in Dec 00. The RI, which documents the extent of sampling completed at the site, is available for review at the CSO library. As shown in the EBST figures, the solid waste debris area called the "northeast rubble disposal area" (SWF 1-8) is not included in a FOST subparcel and is set back several hundred feet from the revised subparcel OS-R-4 boundary.

- 24b. Page 14, Subparcel OS-R-4, third bullet. See comment #15 for RIA-104 discussion.

Response: See Response to SSTTDC Comment No. 15.

25. Page 14, Subparcel OS-R-4, last bullet. See comment #9.

Response: The solid waste debris areas have been described and located in enclosure (7). See the Navy's General Response No. 6.

26. Page 14, Subparcel OS-R-5, first bullet. Please show clearer subparcel boundary lines along French Stream - Figure 12.

Response: Comment noted. The EBST figure for subparcel OS-R-5 has been clarified to show the boundary of OS-R-5 at the 20-ft setback from French Stream.

27. Page 14, Subparcel OS-R-5, third bullet. How long does the Navy feel that it will take to close out RIA-7b? Have locations for additional sampling been chosen?

Response: As summarized in enclosure (5), the Navy completed a final NFA Decision Document for RIA 7B (household debris along fenceline) in Jan 02.

28. Page 14, Subparcel OS-R-5, fourth bullet. See comment #5b.

Response: See Response to SSTTDC Comment No. 5b.

29. Page 14, Subparcel OS-R-5, last bullet. See comment #9.

Response: The solid waste debris areas have been described and located in enclosure (7). See the Navy's General Response No. 6.

30. Page 15, Subparcel OS-W-1, first bullet. Add building 133A to the list of buildings located on this subparcel.

Response: Comment noted. Building 133A has been added to the list of buildings present in subparcel OS-W-1.

31. Page 15, Subparcel OS-W-2. It appears that a portion of RIA-50 is located in this subparcel. Please revise Figure 14 if RIA-50 is outside of this subparcel.

Response: The investigation at RIA 50 (possible LBP in soil at Building 128) was limited to soil around the day care center and not to the wooded area that is part of Subparcel OS-W-2. The figure has been corrected. As summarized in enclosure (5), the Navy anticipates that NFA is required for RIA 50.

- 32a. Page 16, Subparcel OS-W-2. Regulators discovered more solid waste (foundations, etc.) debris during a recent walkthrough within this subparcel. Please show these other areas of debris on Figure 14.

Response: Debris areas have been labeled on enclosure (7) maps. See the Navy's General Response No. 6. The Navy will not remove foundations from structures that pre-date the development of the base.

- 32b. Page 16, Subparcel OS-W-2. The SSTTDC is concerned about an area of household debris located within a berm along the southeastern corner of this subparcel. SSTTDC suggests that this area be investigated more fully and possibly sampled pending regulator opinion.

Response: The household debris in this area is the result of trespassers onto NAS South Weymouth property. The debris generally consists of beverage bottles and miscellaneous litter. Other debris in this area that may be related to past Navy operations (i.e., the roll of roofing felt identified by MADEP in their EBST comments on OS-W-2) are non-hazardous. See the Navy's General Response No. 6. The Navy is addressing solid waste debris separately from the FOST. As noted in enclosure (7), the Navy has removed the trespass litter.

33. Page 16, Subparcel OS-W-2, third bullet. Please add RIA-92 to the list of those sites that are within 200' of this subparcel. Have there been recent discussions with the regulators pertaining to any additional sampling and/or removal actions at RIA-92?

Response: Comment noted. RIA 92 (Hobby Shop) has been added to the list of sites located within 200 ft of Subparcel OS-W-2. There have not been recent discussions with the regulators pertaining to RIA 92. The Navy currently anticipates preparing a Various Removal Action (VRA) Decision Document.

34. Page 16, Subparcel OS-W-2, last bullet. See comment #9.

Response: The solid waste debris areas identified in this subparcel have been described and located in enclosure (7). See the Navy's General Response No. 6.

- 35a. Page 16, Subparcel SPUD-1, first bullet. Please adjust Figure 8 to show a clearer boundary line around this subparcel. The boundary line is not visible near RIA-78c.

Response: Comment noted. The boundary of SPUD-1 has been clarified in the EBST figures. The area containing EBS

RIA 78C (undocumented removal of UST at Building 102) has been removed from the FOST.

- 35b. Page 16, Subparcel SPUD-1, first bullet. Please add building 122 to the list of buildings within this subparcel. SSTTDC is concerned that the Navy has not sampled the drywell located within the former pin setting room of building 122. The MADEP considers this drywell to be a shallow injection well that requires closure prior to property transfer (MADEP comments to Draft FOSL for building 122). Given the potential for greases or oils to be present in this room during the operational years of the facility, SSTTDC suggests that the drywell be sampled to ensure that no significant risk is present here.

Response: Building 122 has been added to the list of buildings present within subparcel SPUD-1. Descriptions of Building 122 are already provided in the text and Table 1 of the EBST.

The Navy, EPA, and MADEP previously inspected the drywell and verbally agreed that NFA was required.

36. Page 17, Subparcel SPUD-1, last bullet. Please revise this paragraph to state that MCP site 3-13316 (NEX) is located within the subparcel. Please revise for RIA-78c if it is partially located within the subparcel.

Response: Comment noted. The text has been modified accordingly. The area containing EBS RIA 78C (undocumented removal of UST at Building 102) has been removed from the FOST.

- 37a. Page 17, Subparcel SPUD-2. The Navy should mention that RIA-42 is located within this subparcel, and discuss current status in the text.

Response: Comment noted. The text has been modified accordingly. The Navy issued a final NFA Decision Document for RIA 42 (subsurface asbestos-lined pipes) in Apr 02 and anticipates regulatory concurrence in May 02.

- 37b. Page 17, Subparcel SPUD-2. Please revise Figure 8 - the boundary line for this subparcel is not visible near RIA-90. If RIA-90 is outside of this parcel, please draw the boundary line adjacent to the site.

Response: Comment noted. The boundary of SPUD-2 has been clarified in the EBST figures and with respect to RIA 90 (pipes protruding from the ground around Building 20). RIA 90 and Building 20 are not located in subparcel SPUD-2. As summarized in enclosure (5), the Navy, EPA, and MADEP agreed in Jan/Feb 02 that NFA is required for RIA 90.

38. Page 17, Subparcel SPUD-3. Please add a paragraph to discuss the solid waste located on the subparcel (north-central portion of subparcel). See comment #9 too.

Response: The solid waste debris areas have been described and located in enclosure (7). See the Navy's General Response No. 6.

39. Page 17, Subparcel SPUD-3, first bullet. The southeastern corner of the subparcel boundary is not clearly shown. Please re-scale Figure 9 to show the entire subparcel and thicken the boundary lines adjacent to Old Swamp River to show that the stream is not part of the subparcel.

Response: Comment noted. The boundary of SPUD-3 has been clarified in the EBST figures.

40. Page 17, Subparcel SPUD-3, last bullet. See comment #15 pertaining to the RIA-104 discussion.

Response: See Response to SSTTDC Comment No. 15.

41. Page 17, Subparcel SPUD-4, third bullet. See comment #15 pertaining to the RIA-104 discussion.

Response: See Response to SSTTDC Comment No. 15.

42. Page 19, Subparcel SPUD-4, last bullet. See comment #9.

Response: The solid waste debris areas have been described and located in enclosure (7). See the Navy's General Response No. 6.

- 43a. Page 19, Subparcel SPUD-6. Please add a paragraph discussing those sites that are located within 200' of this subparcel. Also mention that RIA-2d is located within the subparcel — or revise Figure 15 to show boundary line adjacent to RIA-2d. Has the Navy scheduled the additional sampling for RIA-2d? Please revise the table in enclosure 5 accordingly (if not sampled in April 2001). Based upon previous comments, are the regulators confident that the Navy has sufficiently determined the ground-water

flow to have a mostly southern component, therefore eliminating the SPUD-6 subparcel from being a potential receptor?

Response: Comment noted. A paragraph has been added to describe the environmental sites located within 200 ft of SPUD-6. RIA 2D is an adjacent site of SPUD-6 because RIA 2D pertains to the grass-covered area adjacent to the runway. The map has been revised to show RIA 2D as adjacent. RIA 2D was resampled in May 01. The status reported for the EBS RIAs has been updated for the final FOST. The groundwater flow direction at this location based on data from three, well-triangulated monitoring wells is clearly to the south, away from SPUD-6.

- 43b. Page 19, Subparcel SPUD-6. The SSTTDC is concerned that the Navy has not adequately investigated the wetlands located downgradient (southwest) of the Fire Fighting Training Area (IR site #4). The regulators have stated concerns pertaining to COPC migration from the adjacent taxiway and/or the nearby Fire Fighting Training Area (see EPA comments dated March 7, 2001 on the Draft Final Phase II RI for the FFTA). Depending on future sampling results, this area, southwest of the FFTA could become another RIA under the EBS program while work at the FFTA continues separately.

Response: See Response to EPA General Comment No. 7.

- 44a. Page 19, Subparcel SPUD-7, first bullet. Please revise Figure 12 to show a clear western boundary adjacent to French Stream. See comment #5b pertaining to potential impacts from RIA-62.

Response: See Response to SSTTDC Comment No. 5b.

- 44b. Page 19, Subparcel SPUD-7, first bullet. Please mention the stone piles that were found within this subparcel. Is this a large area of debris, and does the Navy anticipate any future activities associated with these piles?

Response: Stone piles are not an environmental concern. No past releases of hazardous substances or petroleum products are suspected.

45. Page 20, Subparcel SR-R, last bullet. Please plot the surficial debris mentioned here on Figure 11. See comment #9 too.

Response: The solid waste debris areas have been described and located in enclosure (7). See the Navy's General Response No. 6.

46. Page 20, Subparcel SR-W-1, first bullet. Please mention that this subparcel includes the parking lot behind building 75 and the adjacent basketball court. According to Figure 8, RIA-46 is partially located within this subparcel. Please mention this in the text or revise Figure 8 to show RIA-46 next to the subparcel. Please add a paragraph to discuss those sites that are within 200' of the subparcel, and discuss accordingly.

Response: Comment noted. The first bulleted description of SR-W-1 has been modified to state that the subparcel includes the parking lot behind Building 75 and the adjacent basketball court. A paragraph has been added to describe the environmental sites located within 200 ft of SR-W-1. The investigation area for EBS RIA 46 (suspected buried ACM at Building 75) slightly overlaps subparcel SR-W-1; however, the Navy issued a final NFA Decision Document for RIA 46 in Apr 02 and is anticipating regulatory concurrence in May 02.

47. Page 23, Asbestos, seventh bullet. Is the window caulking mentioned here considered to be friable, accessible, and damaged? If so (i.e., per the 2001 PIH survey), please revise this item to state that the Navy will perform the necessary abatement of this ACM prior to property transfer.

Response: The current condition of ACMs, as identified from the Aug 01 update of the *PIH Survey*, is summarized in Table 1 of enclosure (1). Subsequent to this FOST but prior to transfer, the Navy will implement the DoD policy regarding ACMs in accordance with a written statement of facility-specific utilization or non-utilization as provided by SSTTDC.

48. Page 24, Asbestos, tenth bullet. Should the 2001 PIH survey determine that the window caulking or flue insulation at building 98 is friable, accessible, and damaged, please revise this item to state that the Navy will perform the necessary abatement of the ACM prior to property transfer.

Response: See Response to SSTTDC's EBSL Comment No. 47.

49. Page 25, Asbestos. Please add RIA-46 to the list of RIAs associated with ACM.

Response: EBS RIA 46 (suspected buried ACM at Building 75) has been added to the list of RIAs associated with ACM, because the investigation area for RIA 46 did slightly overlap the SR-W-1 subparcel. However, the Navy issued a final NFA Decision Document for RIA 46 in Apr 02 and anticipates regulatory concurrence in May 02.

50. Pages 25-27, EBS Review Item Areas Table. RIAs 2d, 4a, 46, 50, and 90 should be added to this table — they appear to be partially located within FOST subparcels. Please revise the respective figures if these RIAs are not located within a FOST subparcel.

Response: Except as noted for EBS RIA 46 in the above Response to SSTTDC Comment Nos. 46 and 49, these RIAs are not located within the FOST subparcels. See Responses to SSTTDC's Comments Nos. 43a, 5a, 31, and 37b, respectively.

51. Page 28, MCP Sites Table. Please add a fifth column for the subparcel locations for the MCP sites listed here.

Response: Comment noted. The referenced MCP summary table has been modified to match the format of the EBS summary table on the previous page of the EBST. Subparcel locations have been added.

52. Page 31, ASTs and USTs, third bullet. Mention the AUL for building 31 here too.

Response: Comment noted. The AUL for Building 31 has been noted in this section. The AUL is already described in enclosure (2).

53. Table 1, Page 12, Subparcel OS-W-2. This row states that SWF2-9 has been removed. Please note this on Figure 14 if it has been removed, or delete this note from Table 1.

Response: Comment noted. The note has been removed from Table 1. SWF2-9 (pipe) will be handled in accordance with the solid waste program. See the Navy's General Response No. 6.

54. Table 1, Page 15, Subparcel SR-R. Please add a note stating that surficial debris is present within this subparcel (as noted on p. 20 of enclosure 1), or disregard this comment if p. 20 is incorrect.

Response: See the Navy's General Response No. 6 regarding solid waste. Enclosure (7) indicates that various pieces of debris are located in the subparcel. The debris identified from the recent site walks includes a tire, sections of barbed wire, fence material, and rebar. The debris also includes miscellaneous litter that appears to have been thrown over the fence onto Navy property. No releases of hazardous substances are suspected. As noted in enclosure (7), much of this debris has been removed.

55. Table 2, Pages 2-4. Please carry over the table headings for ease of reference.

Response: Column headings have been included on each page of the table.

56. Figures 1-15. Please add a legend box to all figures for the yellow parcel designations. The color coding in most figures is ambiguous and needs clarification. Some of the open space zones are not properly represented.

Response: See Response to EPA's General Comment No. 11. The open space zones have been revised in the figures.

SSTTDC'S COMMENTS ON ENCLOSURE (2) FROM 17 MAY 01

1. Page 2, item 2a. For the record, the SSTTDC notes that the Navy is not in compliance with this covenant at this time.

Response: Covenant 2(a) states that the Navy warrants that "all remedial action necessary to protect human health and the environment with respect to any hazardous substances remaining on the subject subparcels has been taken." The Navy is not out of compliance with this covenant because enclosure (2) has not yet been made part of a property transfer document. As stated in Item 7 of the FOST Memorandum, enclosure (2) will be included as part of property transfer documents (at which time the covenants, conditions, reservations, and restrictions become effective). As previously stated, before the transfer of any subparcel containing an EBS RIA, the Navy will complete final Decision Documents and/or reach NFA agreements with EPA and MADEP on the RIA(s) located within that FOST subparcel. No Decision Documents will be prepared for RIAs that were transferred to other programs or deemed to require NFA during the early stages of the EBS program. As of Feb 02, the Navy, EPA, and MADEP have agreed on NFA for 10 of the 16 RIAs located within the FOST subparcels. The Navy is currently working with EPA and MADEP toward reaching final NFA Decision Documents or NFA agreements as

soon as possible for the remaining 6 EBS RIAs contained within the FOST subparcels.

No IR Program sites or ongoing MCP investigations are located within the FOST subparcels. See the Navy's General Response No. 6 regarding solid waste debris areas.

2. Page 2, item 3, last sentence. Should this sentence refer to Figures 1 through 15 instead of 1 through 6?

Response: The text has been modified to state "Attached hereto are figures showing site location and the subject zoning subparcels."

- 3a. Page 5, item 7. This section states that "the historic fill material presents no unacceptable risk in its present state and if left undisturbed." Please provide more detail pertaining to the specific locations of this fill material within the subparcels that "may contain elevated concentrations of metals and...SVOCs."

Response: See Response to EPA Specific Comment No. 38.

- 3b. Page 5, item 7. Removal of surficial solid waste debris under the NAS solid waste program may uncover/expose areas of this historic fill material that has not been previously investigated/sampled by the Navy. How will the Navy address this issue during closure of these solid wastes sites in preparation of property transfer?

Response: See Response to EPA Specific Comment No. 38. Historic fill will not be investigated/sampled by the Navy unless there is a specific indication of a potential past release of hazardous substances or hazardous wastes to the environment.

SSTTDC'S COMMENTS ON ENCLOSURE (3) FROM 17 MAY 01

1. Please update the last column to document the most recent documents for each IR site; i.e., the Draft Feasibility Study for the West Gate Landfill.

Response: The status of each site in enclosures (3), (4), and (5) have been updated for the final FOST.

SSTTDC'S COMMENTS FROM 3 JUL 01

1. The Navy should note that they have not adequately drawn the zoning boundary lines on the figures in the FOST.

Please review the zoning boundaries that the SSTTDC must adhere to, and revise the FOST document accordingly. In particular, note that figures 2, 7 and 8 have inaccurately depicted the zoning boundary for the SPUD-1 subparcel (northern and southern boundaries). I have enclosed a copy of the SSTTDC's wetlands resource area delineation and land zoning map superimposed onto the existing site base map for your quick reference (figure 1). This information should be on electronic media previously supplied by SSTTDC to the Navy. SSTTDC can supply the Navy with the zoning map overlay should it assist you with the final version of the unencumbered FOST or future FOSTs.

Response: The boundaries of the FOST subparcels have been clarified in the EBST figures. Subsequent to the FOST, the Navy will complete survey legal descriptions of property to be transferred to SSTTDC.

2. Please note that this FOST does not fully encompass the two parcels within the northwest quadrant of the base that are planned to be developed during our first stage of redevelopment, SR-W and SPUD (see parcels outlined in yellow on figure 1). Our first stage of development is scheduled to occur in 2003. SSTTDC notes that an MCP site, the Fuel Farm (SPUD) and outstanding issues pertaining to unconsolidated solid waste (SR-W) have hindered these two parcels from being a part of this unencumbered FOST.

Response: The Navy is aware that the SSTTDC's Phase I development is planned for the northwest quadrant of the base (the property north of Trotter Road and waste of Shea Memorial Drive). The Navy is prioritizing the remaining environmental sites within the northwest quadrant and is working to transfer property as soon as possible. Documentation supporting the transfer of the remaining property within the northwest quadrant of the base is being prepared under separate cover. As summarized in enclosure (4), the Navy has closed the MCP Fuel Farm site with the filing of a final Class A-2 Response Action Outcome (RAO) in Feb 02.

3. SSTTDC urges the Navy to commence work on a second FOST that will include all remaining land located within the SR-W and SPUD/northwest parcels as well as the other parcels (mostly OS-C) that make up the balance of the northwest quadrant of the base. The northwest quadrant of the base essentially consists of that land that is located south and west of Shea Memorial Drive and bounded by the southern extent of the OS-C parcel (outlined in red on figure 1).

At this time the SSTTDC has had several discussions with interested developers who are ready to continue negotiations regarding the initial build in the northwest quadrant.

SSTTDC sees two problems that must be addressed by the Navy in order to expedite a FOST that would include the entire northwest quadrant.

1. Navy, regulators and SSTTDC resolve the outstanding issues pertaining to the unconsolidated solid waste debris at the base.

2. Closure of the Fuel Farm MCP Site without a mandatory Activity and Use Limitation imposed on the parcel.

Response: As summarized in enclosure (4), the Navy has completed work at the Fuel Farm MCP site and filed a final Class A-2 RAO in Feb 02. On 25 Jan 02, the Navy issued a new draft FOST for additional areas in the northwest quadrant of the base that are needed for SSTTDC's Phase I development (including the area of the former Fuel Farm). The Navy is currently working to resolve comments that were received during the public comment period and plans to finalize that FOST as soon as possible. The Navy will address the suitability to transfer the remaining areas in the northwest quadrant under separate cover (pending).

4. SSTTDC is concerned with the amounts of solid waste debris and historical fill located within most of the parcels at the base. Many of the FOST comments that were issued by the regulators and the public pertained to this issue. A decision document or similar report should be issued by the Navy that discusses (locations, compositions, approximate quantities, sampling information, etc.) all of those areas containing unconsolidated solid waste debris. This report should assist all technical reviewers (regulators, SSTTDC, public, etc.) in crafting an action plan (or no action, if the case may be) for each area of debris at the base. The response actions, if any, that are outlined in the action plan should not delay the SSTTDC's redevelopment schedule in the northwest quadrant or elsewhere [sic], unless a significant threat to human health and/or the environment was discovered at a particular location (through additional sampling, etc.). SSTTDC should expect to be able to take title of the northwest quadrant without any outstanding

issues pertaining to the unconsolidated solid waste debris on the site.

Response: See the Navy's General Response No. 6.

Enclosure (7) has been included to the FOST as notification of the presence, descriptions, locations, and status of the solid waste debris found within the FOST subparcels. The Navy acknowledges SSTTDC's concerns regarding solid waste; however, the Navy in accordance with its BRAC mission, will continue to concentrate efforts on environmental investigations and restorations related to releases of hazardous substances or materials that may pose risks to human health or the environment. As noted in enclosure (7), the Navy has already removed many of the items of debris. The Navy is continuing to coordinate with the State regarding the presence of debris.

5. Currently the Navy has until May 19, 2002 to issue their Tier II Response Action Outcome (RAO) Report for the Fuel Farm site. SSTTDC understands that additional remediation is required, and that the remediation should be occurring within the next few months. The Fuel Farm site comprises almost half of the SPUD parcel in the northwest quadrant. In order for SSTTDC to use all available resources in the site design stage for successful construction up to 300,000 SF of office space in this parcel, there cannot be an Activity and Use Limitation imposed upon the parcel. SSTTDC urges the Navy to expedite remaining remediation at the Fuel Farm and subsequent documents necessary for proper closure of this particular MCP site.

Response: The Fuel Farm is not part of this FOST. The Navy has discussed and will continue to discuss the scope of a FOST for additional property in the northwest quadrant with SSTTDC, EPA, and MADEP separately from this Responsiveness Summary. However, as summarized in enclosure (4), the Navy has since completed work at the Fuel Farm MCP site and filed a final Class A-2 RAO in Feb 02.

ADDITIONAL SPECIFIC PUBLIC COMMENTS

Public comments received on the draft FOST are attached to this Responsiveness Summary. Similar comments that were received from the public are grouped and responded to in the "Navy's General Responses" section at the beginning of this Responsiveness Summary. Those general comment/responses are not repeated here. Also, comments that did not pertain to the FOST are not addressed in this Responsiveness Summary. The Navy's responses to the remaining specific public comments on the FOST are as follow:

COMMENTS FROM DAVE WILMOT (10 May 01, 23 May 01 and 5 Jun 01, 11 Jun 01, 13 Jun 01, and 14 Jun 01)

1. Mr. Wilmot's letter of 10 May 01 raised the concern that "following this conveyance, the Navy will be removed from liabilities regarding the property, and SSTDC and its sponsoring communities will be left with environmental situations that should have been at least, in part, remediated by the Navy." Similarly, Mr. Wilmot's letter of 5 Jun 01 raised the concern that the covenants would remove the Navy's responsibility/liability for the historic fill material at the base which may contain elevated concentrations of metals and SVOCs. Finally, Mr. Wilmot's letters of 11 Jun 01, 13 Jun 01, and 14 Jun 01 raised additional concerns that "Rapid Transfer" would remove the Navy's responsibility/liability for conducting remediations.

Response: The FOST does not transfer the property; it is one step toward that goal. Except for the close-out of a few EBS RIAs (see the "EBS Review Item Areas" section of the EBST), the property evaluated in this FOST does not contain environmental sites that require further remediation. Prior to transfer, the Navy will reach NFA agreements with EPA and MADEP for the few EBS sites on the property.

For the base in general, in accordance with the signed FFA with EPA, the Navy is legally required to complete the investigations at the identified sites covered under the NPL (i.e., IR Program sites and EBS RIAs that move into CERCLA). The Navy is also legally required by Massachusetts law to complete the investigations at the identified MCP sites. After property transfer, the Navy will continue to be responsible for any currently undiscovered environmental sites that are attributable to the Navy's past operations; for example, if future work on the property reveals the presence of an underground fuel

tank of which the Navy is currently unaware. Conversely, the Navy will not be responsible for releases of hazardous substances or petroleum products that are caused by the SSTTDC or future tenants/property owners.

See the Responses to EPA Specific Comment No. 38 regarding the presence of historic fill material.

Early Transfer of base property is only one of several transfer options being considered by the Navy and SSTTDC. Even with Early Transfer, there remains a legal responsibility for the Navy and/or the new property owner to ensure completion of the required environmental investigations/restorations. The 14 Jun 01 RAB meeting minutes include additional information about the Early Transfer process.

2. Mr. Wilmot's letters of 10 May 01 and 23 May 01 commented that the Navy should be held responsible for the remediation of the significant impacts to French Stream resulting from past military use of the base. The letter also asked for clarification of the Navy's responsibility for the restoration of French Stream and Old Swamp River.

Response: French Stream and Old Swamp River have been identified as RIAs under the EBS program at NAS South Weymouth (RIAs 62 and 104, respectively) and as Site Screening Areas under the FFA signed by the Navy and EPA Region I. Therefore, the Navy is responsible for restoration of these areas through the CERCLA process if restoration is deemed to be necessary to protect human health or the environment. The property containing RIA 62 (French Stream) and RIA 104 (Old Swamp River) have been removed from this FOST. Prior to the transfer of the property containing RIAs 62 and 104, the Navy will reach concurrence with EPA and MADEP on these RIAs.

The Navy will be compiling a Basewide Watershed Assessment report that will include a description of French Stream and Old Swamp River, as well as the associated watersheds and drainage channels. Existing observations of physical conditions, aquatic ecological habitat, and chemistry data will be compiled. Key information anticipated will include Target Compound List (TCL) and Target Analyte List (TAL) parameters (i.e., organic/inorganic), as well as Total Organic Carbon (TOC), Dissolved Oxygen (DO), Biological Oxygen Demand (BOD), and other physical, chemical, biological, and toxicological data available from the Phase I and II RI programs. Available surface water and sediment data from the Navy's MCP and EBS programs will

also be incorporated to the extent possible, where available. Tables and figures will present comparisons of upstream and downstream conditions across the base, for both the French Stream and Old Swamp River watersheds. Text will supplement the tables and figures, presenting conclusions relative to sediment and surface water quality, potential onsite and offsite contributions, and background conditions. A limited field assessment will be performed to view recent observations of iron flocculate, and confirm previous observations of the general stream and river conditions. Flow measurements recorded earlier in the program will also be presented. No new flow measurements and no additional sampling will be necessary.

3. Mr. Wilmot's letter of 10 May 01 commented that "Frenches Stream, a perennial stream running from uplands in Abington and Weymouth, through the base property and on southeast to the North River, has been seriously compromised by Navy activity. The historical flow, and water quality of this stream has become one of the most polluted and lifeless waterways in southeastern Massachusetts. A recent MacroInvertebrate Survey of the North and South River Watersheds was conducted in 1998 (SaintOurs). Using Wilsenhoff's 1982 Biotic Index Methods to Evaluate Water Quality in Streams, it was discovered that Frenches Stream below the base had 'one of the lowest Benthic Habitat and Biotic Index ratings in the entire North River Watershed'."

Response: The Navy has located and reviewed the referenced document from the following internet address <http://omega.cc.umb.edu/~conne/fred/thesis/thesis1.htm>. The information presented in this student's thesis cannot and, in fact, does not make such claims about the conditions of French Stream due to the presence of NAS South Weymouth.

The author's final conclusion about French Stream states the following:

"A single-site comparison between the four stream segments suggests that the section of French Stream at North Ave in Rockland has low diversity and abundance of macroinvertebrate organisms. This could possibly be due to upstream sources of contamination which is negatively affecting water quality. This stream is intersected by four road crossings, and drains the decommissioned Weymouth Naval Air Station, which has been declared a superfund area. The riverbed at some point had been channelized, thus negatively affecting the benthic diversity as well. The sampling site is

just below the Rockland Town Forest, a 20 acre parcel immediately downstream from the NAS. Samples taken upstream from the base, along with more downstream samples, would be needed for an accurate comparison."

No data are provided to support the speculations of upstream sources of contamination (no chemical data were collected or evaluated) or negative impacts to the stream resulting from channelized segment of the stream on the base. As acknowledged by the author in the above quote, more samples would be required to make any accurate assessments regarding the base. The Navy has identified the following additional data gaps from the referenced document:

- Sampling occurred in the month of July (which the author acknowledges) which is not the preferred time to conduct a benthic assessment. Spring is a more appropriate time for such as sampling program because many species have not emerged yet and are late instars (lifestage) which are more readily identified.
- French Stream is located in the coastal plain of Massachusetts. Therefore, there are newer methods published by EPA which are more appropriate for this eco-region (i.e., EPA's 1997 "Field and Laboratory Methods for Macroinvertebrates and Habitat Assessment of Low Gradient Streams", Mid-Atlantic Coastal Streams [MACS] Workgroup, Environmental Services Division, Region 3, Wheeling, WV).
- Only one location was sampled downstream of NAS South Weymouth. More locations are necessary to arrive at a suitably accurate assessment of biological conditions in the stream.
- No locations of French Stream were sampled upstream of NAS South Weymouth. Therefore, the study can make no conclusions whether the water quality was better before entering NAS South Weymouth.
- No detailed habitat assessment was conducted at the sampling location for French Stream. Habitat degradation can be a major cause of biological impairment.
- Although the author discusses a reasonably good sampling approach in his research plan, the sampling was conducted with a hand held strainer, which is not an approved sampling method. Usually a dip net or kick net are used which sample a larger area and are more likely to collect more individuals and more importantly, more species. The MACS method referenced above recommends the collection of 20 sweeps/samples using a dip net.

- Only five or six samples were collected at each location, which is not adequate effort for this type of study (and type of sample collection gear).
 - Organisms were identified to family level. Although impairment (moderate to severe only) can be detected at this level, a genus/species level taxonomy would yield more information about tolerance values of taxa and result in a more accurate assessment of biological condition.
 - The Hilsenhoff Biotic Index, although a widely accepted method used in many studies, is actually most useful to evaluate organic enrichment effects (e.g., sewage). There is some question concerning the effectiveness of this Index in discerning impacts from other causes such as from chemical effects. No bioassessment should be based on one metric alone. A multi-metric approach would yield more information about community structure and possible impairment. Various metrics/methods are available from which the most appropriate can be selected to suit the site-specific conditions.
 - The low numbers of organisms and low taxa richness reported in the document is an indication of impairment; however, further investigation is needed to determine definitively the extent and cause (more sampling stations, habitat assessment, identify point source discharges, more rigorous sampling method, etc.).
4. Mr. Wilmot's letter of 23 May 01 questioned whether the overgrown hillock, which appears to contain some debris, located near the base control tower is a Navy landfill.

Response: There is no known landfill in this area of the base. It is assumed that the hillock in question refers to the area immediately behind the old tower. This area is not a disposal site. In conjunction with the construction of the new tower, the Navy had started to construct a communications tower behind the old tower. The concrete footing was put in-place and then all construction on the new tower and the communications tower was cancelled. The concrete footing of the planned communications tower is still in-place and this area is now partially overgrown.

5. Mr. Wilmot's letter of 23 May 01 questioned how the SSTTDC can plan use the French Stream aquifer as a potable water source when the public health risk assessments cite high levels of arsenic, thallium, and lead in groundwater.

Response: This issue does not pertain to the FOST of the subject subparcels. However, the SSTTDC has been

conducting aquifer tests (e.g., yield and water quality) for their planned new source supply well. See the minutes from the 13 Apr 00 RAB meeting regarding Massachusetts' water supply source approval process. The State has rigorous and protective requirements for approving a new water supply source.

The Navy is responsible for addressing groundwater impacts at its known sites for COC concentrations that exceed regulatory or risk thresholds.

6. Mr. Wilmot's letter of 23 May 01 questioned why the Navy is not investigating high concentrations detected in samples collected close to the base perimeter during the study of background conditions. The letter also questioned why the Navy has not investigated property outside the base perimeter given these data results and given that there is reason to believe that Navy activity has occurred there. The letter raised the concern that the Public Health Assessment for NAS South Weymouth by the Center for Disease Control (CDC) does not have any offsite sampling data for that evaluation.

Response: High concentrations of COCs were not detected in perimeter background samples. However, at two interior (not perimeter) locations of the base which were originally targeted as background locations, further research indicated that past Navy operations may have affected soil at these two locations. **The Navy designated these locations as EBS RIAs 108 and 109.** See also the *Final Summary Report of Background Data Summary Statistics for NAS South Weymouth* of Feb 00.

7. Mr. Wilmot's letters of 23 May 01, 11 Jun 01, and 13 Jun 01 claim there to be a real possibility that the long-term public exposure to contamination (specifically, metals) in the French Stream/Thompsons Pond area due to Navy activities has resulted in him and other people in the Abington area (and potentially the Rockland area) contracting Multiple Sclerosis (or potentially a misdiagnosis of poisoning from heavy metals).

Response: As described in the EBST **and enclosures (4) and (5), the current and former environmental investigation areas** within the FOST subparcels and have not been found to have had any impact on Thompson's Pond.

The Navy is addressing the known sites at NAS South Weymouth that could potentially cause unacceptable risks to human health or the environment due to past operations at

NAS South Weymouth. The Navy will conduct offsite sampling if a release from a Navy site is found to be migrating onto off-base property; however, to date, such migration has not been identified.

The Massachusetts Department of Public Health Bureau of Environmental Health Assessment and the Agency for Toxic Substances and Disease Registry (ATSDR) should be contacted for information and support regarding concerns about public health effects.

8. Mr. Wilmot's letter of 23 May 01 and 5 Jun 01 state that the Navy has contaminated Thompson's Pond.

Response: As described in the EBST and enclosures (4) and (5), the current and former sites within the FOST subparcels have not impacted Thompson's Pond. Specifically, the environmental investigations have been, or soon will be, completed for sites within the FOST subparcels. Furthermore, the extensive investigations by the Navy, EPA, and MADEP of the environmental conditions at other sites at the base, and of the basewide conditions in general, have not identified any offsite chemical impacts to Thompson's Pond resulting from past Navy operations. Current hydrological data indicate that surface water from Thompson's Pond flows onto base property; therefore, it is unlikely that the conditions at the base could have had an impact on the pond.

9. Mr. Wilmot's letters of 11 Jun 01 and 13 Jun 01 commented that there are data gaps (e.g., insufficient number of soil samples, adequacy of database to support human health risk assessments) in the Navy's investigations as reported in the Phase I RI report. Mr. Wilmot questioned whether the groundwater impacts identified in the RI were remediated, why the Navy has not conducted soil testing in the southwest portion of the base, and why no surface water samples were collected between the West Gate Landfill and the location where French Stream leaves the base.

Response: None of the sites investigated as part of the *Phase I RI* are included in this FOST.

The Navy has completed, or is conducting, additional investigations to address data gaps in separate Phase II RI reports for each IR Program site and as part of the ongoing MCP work and the Phase II EBS work for the EBS RIAs. These documents are available for review at the CSO library. In particular, the Phase II RI for the West Gate Landfill and the Phase II RI for the Tile Leach Field describe the

results of soil, groundwater, surface water, and sediment samples from the IR Program sites in the southwest portion of the base. Additional soil sampling results from this region of the base are available from the investigations of EBS RIAs 1, 2E, 4A, 4B, 5, 6, 100, and 101. The Navy is conducted additional sampling in this region of the base during Aug/Sep 01 as part of the EBS program.

To date, except for an ongoing test application of an in-situ oxidation technology at IR Program Site 9 (Building 81), no groundwater remediation has been conducted at the IR Program sites. The Navy has recently completed Phase II RI reports for the IR Program sites and, where a remedial action may be necessary to be protective of human health and the environment, the Navy is preparing Feasibility Study reports to develop and evaluate the remedial alternatives. This process is in accordance with the federal CERCLA laws and the DoD IR Program.

10. Mr. Wilmot's letters of 11 Jun 01 and 13 Jun 01 questioned why the Navy is not immediately addressing the southwest portion of the base, which could be the most contaminated portion of the base given the geology, hydrology, and the locations of the West Gate Landfill, Fuel Farm, Tile Leach Field, and Sewage Treatment Plant sites at the base.

Response: As described in the EBST and enclosure (5), the sites within the FOST subparcels (only EBS RIAs) require NFA and, therefore, have not affected the southwest portion of the base.

The Navy is addressing the known extents of the sites on a case-by-case basis. The Navy currently is completing *Phase II RI* reports for the West Gate Landfill, Tile Leach Field, and the Sewage Treatment Plant under the IR Program. The Navy also has completed the required work at the Fuel Farm MCP site and filed a final Class A-2 RAO in Feb 02. See the Response to Mr. Wilmot's Comment No. 3 regarding the Navy's investigation of French Stream. The Navy's prioritization of the investigations at NAS South Weymouth is based on several factors (e.g., potential risks, available resources, etc.) and is coordinated with EPA, MADEP, and SSTTDC.

11. Mr. Wilmot's letter of 11 Jun 01 questioned whether the Phase I RI's designation of the base as an "urban area" means that less stringent cleanup standards would be used.

Response: None of the sites evaluated in the *Phase I RI* is included in this FOST. However, the *Phase II RI* reports

for the IR Program sites include Human Health Risk Assessments and Ecological Risk Assessments that evaluate potential receptors under several reuse scenarios, including residential scenarios as well as commercial/industrial scenarios. The final selected remedial action for each IR Program site will be presented in a ROD for each site. To date only a ROD for the Small Landfill has been completed. Although specific cleanup goals can vary depending on site conditions and the planned reuse, the final remedies will be designed to mitigate unacceptable risks as necessary, in accordance with CERCLA.

12. Mr. Wilmot's letter of 13 Jun 01 requested that the Navy provide an online GIS-style tool that would help the public understand the environmental conditions and status of the base.

Response: Since May 01, the Navy has provided such a service to the public regarding the environmental status of NAS South Weymouth. The website address is <http://WeymouthNAS.eaest.com>.

13. Mr. Wilmot's letter of 14 Jun 01 requested information regarding the toxicology study of fish in French Stream and the toxicology study on frogs, mice, and earthworms (discussed at a previous RAB that elevated concentrations of PCBs were detected).

Response: The ecological risk assessments in the RI reports for the individual IR Program sites contain the available information. However, neither French Stream (RIA 62) nor the IR Program sites are included in this FOST.

14. Mr. Wilmot's letter of 14 Jun 01 asked whether the Navy would be able to develop a public document that gives full disclosure of contaminants in layman's terms.

Response: The Navy will prepare Proposed Plans for each IR Program site. To date, only a Proposed Plan for the Small Landfill has been completed. The Proposed Plans are designed to be concise yet comprehensive and understandable for a public audience. The Proposed Plans summarize the key information and conclusions for each IR Program site.

15. Mr. Wilmot's letter of 14 Jun 01 indicated that, despite the current fencing around the perimeter of the base, child trespassers are likely to have been in contact with contaminants at the base because there are several breaks in the perimeter fence.

Response: This comment pertains to base security in general and not to the conditions of the FOST subparcels. No IR Program sites are located within the FOST subparcels. The Navy's MCP investigations/remediations have been completed with the FOST subparcels. The subparcels of this FOST contain only a few EBS RIAs for which the Navy has reached, or will soon reach NFA agreements with EPA and MADEP.

The Navy will be responsible for controlling access to base property that is not yet transferred. The Navy will decide on a case-by-case basis whether fencing is warranted for the Navy's remaining sites to ensure a proper level of protection for human safety/health that is consistent with the redevelopment in adjacent areas (e.g., new fencing was installed around IR Program Site 9 due to the ongoing pilot study work). The Navy has already installed warning signs regarding the ongoing environmental investigations in several key locations.

COMMENTS FROM LESLIE MOLYNEAUX (13 May 01)

1. Leslie Molyneaux's comments pertained to solid waste in the FOST subparcels. The comments specifically questioned demolition and landfill deposits, the asphalt pile in B-1W-1, concrete and household trash in OS-A-1; coal ash and asphalt/brick/concrete debris and RIA 100 in OS-A-2, RIA 7B in OS-R-5, surface debris in OS-R-1, 2, 3, 4, and 5, OS-W-2, SPUD-4, and SR-Rs.

Response: See the Navy's General Response No. 6. The Navy has already removed a corroded 55-gallon drum, miscellaneous metal debris, barbed wire, and lumber from RIA 7B. As noted in enclosure (7), the Navy has already removed many of the items of debris around the base.

Due to the required additional work at RIA 100, Subparcel OS-A-2 has been removed from the FOST.

Landfill deposits (i.e., Small Landfill, West Gate Landfill, Rubble Disposal Area) at NAS South Weymouth are not included in this FOST.

COMMENTS FROM MARY PARSONS (17 May 01)

1. Ms. Parsons indicated concern regarding how the subparcels will be transferred to the SSTTDC and what would happen if the SSTTDC should fail. Ms. Parsons commented that the

Economic Development Conveyance has not been released for public review.

Response: If for some reason the SSTTDC were not in the position to accept the property from the Navy (this is not anticipated), then the property would be offered to the individual towns.

The SSTTDC has issued the draft EDC to the Navy.

2. Ms. Parsons commented that the SSTTDC is not properly working with the public or the town boards and committees.

Response: SSTTDC represents the public in the redevelopment of the property; therefore, public concerns about the SSTTDC's actions and policies should be directed to the SSTTDC. See also the Navy's General Response No. 3.

3. Ms. Parsons commented that the FOST figures do not clearly distinguish between "Open Space" and "SPUD" areas. The letter questioned where the remaining Open Space areas are located that are not part of the FOST. The letter stated that Figure 2 FOST gives the appearance that all the open space is being transferred, when it is not.

Response: Subparcel names in the FOST indicate whether the subparcel is zoned for "Open Space" or "SPUD" (e.g., OS-R-1 or SPUD-1, where "OS" is the acronym for Open Space). Exhibit A of the approved Reuse Plan indicates where the remaining Open Space zoned areas are located. A comparison of the zoning map with Figure 2 of the FOST shows that not all-open space areas are included in this FOST.

4. Ms. Parsons letter stated/questioned "Figure 12, Subparcels OS-R-5 and SPUD -7 located in Rockland, RIA 7b may need an ecological or human health risk assessment for mostly household waste. Please explain what is being done to remedy this situation and how close is the monitoring well in that area to RIA 7b and how effective is that monitoring well. In what medium was the mercury detected? The approximate location of RIA 7b is directly behind homes on Spruce St./ Salem St. in Rockland. When will the ecological and human health risk assessment be complete?"

Response: Only trace concentrations of mercury (0.18 mg/kg, and 0.2 mg/kg in a duplicate sample) were detected in surface soil. These trace concentrations did not exceed the benchmark (20 mg/kg) that was derived from the MCP S-1/GW-1 standard that is protective of human health. On 31 Jan 02, the Navy issued a final NFA Decision

Document for RIA 7B because sample concentrations were within background levels and do not pose a threat to human health or the environment. The document is available for review at the CSO library.

5. Ms. Parsons commented that subparcel OS-R-5 is pock-marked with concrete, riprap, steel cable and stone piles and questioned whether this area would be fenced off from the abutting neighbors' backyards.

Response: There are currently no plans to install fencing around these areas. See the Navy's General Response No. 6 and enclosure (7) regarding such debris areas.

6. Ms. Parsons commented that RIA 100 is in the vicinity of the East St. gate in Abington and questioned what the Navy would do in that area.

Response: Due to the Navy's ongoing investigation of RIA 100, subparcel OS-A-2 has been removed from this FOST. The Navy is currently planning to conduct a removal action for COCs in soil at RIA 100.

COMMENTS FROM STU CHIPMAN (18 May 01)

1. See attached mark-ups from Mr. Chipman.

Response: These editorial comments have been incorporated into the FOST.

COMMENTS FROM MARY BYRAM (18 May 01, 8 Jun 01)

1. Ms. Byram's letter of 18 May 01 commented that the wetland, wildlife, and habitat studies, as ordered by the State Secretary of Environmental Affairs in his certificate on the ENF, must be completed before any determination can be made that the property is appropriately cleaned up and suitable for transfer.

Response: See the Navy's General Response No. 1. The wetland, wildlife, and habitat evaluations must be completed before the SSTTDC development but not prior to the FOST supporting property transfer. These studies are a similar part of the evaluation that must be presented in the Navy's Environmental Impact Statement (EIS) and for the SSTTDC's Environmental Impact Report (EIR). The referenced studies are conducted in preparation for the property development. The FOST is the Navy's determination that the subject subparcels are suitable for transfer with respect to CERCLA (i.e., the identified environmental sites and

conditions are suitable to support the planned reuse). The Navy's investigations under CERCLA evaluate the potential risks from the environmental sites to both human and ecological receptors. The Navy's EIS and NEPA ROD must be completed prior to property transfer, but not prior to the FOST.

2. Ms. Byram's letter of 18 May 01 commented that, despite the Navy's promise to come back and cleanup any contamination they are responsible for at a later date, the Navy must clean up all contamination or debris before the land is transferred because future funding is not guaranteed.

Response: The Navy is addressing the identified environmental sites (i.e., IR Programs, MCP, and EBS RIAs). See the Navy's General Response No. 6 regarding solid waste debris. It will be the Navy's legal responsibility to return to NAS South Weymouth should any currently undiscovered environmental impacts associated with past Navy operations be identified in the future. In coordination with EPA and MADEP oversight, the Navy has completed basewide surveys (e.g., the EBS) to identify the areas requiring further investigation or remediation.

3. Ms. Byram's letter of 18 May 01 requested an additional 2 week extension of the public comment period.

Response: The Navy repeatedly extended the public comment period for a total of five additional weeks to 8 Jun 01.

COMMENTS FROM DAVID LABADIE (29 May 01)

1. Mr. Labadie's comments pertained to the Reuse Plan and recommended the use of 8 acres for institutional (homeless) and veterans housing purposes.

Response: See the Navy's General Response No. 1. Please contact SSTTDC with any questions about the redevelopment to be completed in accordance with the approved *Reuse Plan*.

COMMENTS FROM JAMES GEDDES (29 May 01)

1. Mr. Geddes commented that the Navy should not transfer any property until there is guaranteed, legal documentation available to the public that ensures full compliance with all federal and state laws under BRAC95 installations and related policies/guidances (e.g., the enacted Reuse Plan, the DoD's Base Reuse and Implementation Manual, the McKinney Homeless Assistance Act, the Base Closure Community Redevelopment and Homeless Assistance Act of

1994, Massachusetts General Law [MGL] Chapter 40B ["anti-snob law"])). Mr. Geddes expressed concern over the findings/proposals of the FOST with respect to the Reuse Plan. Mr. Geddes commented that there are oversights pertaining to Homeless Assistance, Institutional Uses, Affordable Housing, as well as environmental suitability as relating to these laws.

Response: See the Navy's General Responses Nos. 1 and 2. This FOST does not transfer the property. The FOST incorporates by reference the approved *Reuse Plan*. The comment pertains to the *Reuse Plan* itself and the SSTTDC's plans for redevelopment; however, the comment does not pertain to the Navy's FOST which is a finding of suitability, with respect to the environmental conditions under CERCLA, to transfer the property for the approved reuses. The FOST specifies any requirements and restrictions for the property that are necessary with respect to the reuse.

2. Mr. Geddes commented that there is little to no assurance of Homeless provisions for Veterans within subparcel INST-1. Mr. Geddes commented that the identified hazardous materials in INST-1 would need to be addressed with respect to the potential for reuse of the buildings in that subparcel for children as part of a Homeless Family, or attending educational or religious related functions as allowed by the Institutional zoning.

Response: See the Navy's General Responses Nos. 1 and 2. The comment pertains to the *Reuse Plan* and the SSTTDC's redevelopment plans and not the FOST. Note that page 14 of the 1998 *Reuse Plan* states that Building 31 (located in subparcel INST-1) is one of the four facilities identified by homeless service providers for potential reuse in their programs. The *Reuse Plan* also states that the SSTTDC will work with the Weymouth Housing Authority to identify additional homeless service opportunities within the property.

3. Mr. Geddes commented that the zoning and by-laws from which the SSTTDC will implement the *Reuse Plan* omit a large portion of the area's resident's needs by zoning-out and skirting Massachusetts General Law (MGL) Chapter 40B ("anti-snob law") as that law pertains to the state-mandated 10% of a community's housing stock to be "affordable". There is a limited amount of proposed housing (approximately 2% of the total acreage) being zoned as Senior Housing. Mr. Geddes commented that neither the

Reuse Plan nor its governing documents known as the Zoning and By-Laws have any legal reference to MGL 40B.

Response: See the Navy's General Response No. 1. The FOST is the Navy's determination that the property is suitable for transfer for the approved reuse. Comments on the approved Reuse Plan need to be directed to the SSTTDC and local communities.

4. Mr. Geddes questioned whether the existing Reuse Plan and Zoning By-Laws are being revised as the property plans are changed for other proposed/intended uses. If so, then property zoned for housing should be recovered from other areas so that their initially provided for percentages are retained. For example, if land is determined to be not developable due to the presence of wetlands, then those lost acres should be recovered from other areas of the base.

Response: See the Navy's General Response No. 1. The FOST is the Navy's determination that the property is suitable for transfer for the approved reuse. Comments on the approved Reuse Plan should be directed to the SSTTDC and local communities.

5. Mr. Geddes commented that the omitting of many federal and state laws renders the FOST inaccurate and unenforceable. A new FOST would be required with respect to a revised Reuse Plan and Zoning By-Laws for NAS South Weymouth property.

Response: See the Navy's General Response No. 1. The existing Reuse Plan has been approved and there is no revision underway.

COMMENTS FROM DONALD CANN (31 May 01, 7 Jun 01, 11 Sep 01)

1. Mr. Cann's letter of 31 May 01 requested that the Navy extend the public comment period an additional 8 weeks or until the Fall 01 to facilitate public inspections of the property.

Response: The Navy responded to this comment in a letter to Mr. Cann on 19 Jun 01. The letter indicated that the Navy had extended the end of the public comment period from 2 May 01 to 8 Jun 01 (i.e., over 5 weeks) and that public comments would continue to be accepted after that date. The Navy, MADEP, and EPA have already completed inspections of the base property. The Navy has held, and continues to

offer, public tours of base property upon requests. See the Navy's General Response Nos. 4 and 5.

2. Mr. Cann's letter of 7 Jun 01 stated that there was insufficient time to conduct an escorted tour of RIA 100 and provided comments within the designated comment period.

Response: Due to the Navy's ongoing investigations of RIA 100, subparcel OS-A-2 has been removed from the FOST.

3. Mr. Cann's letter of 7 Jun 01 raised concerns about the status of the Navy's records of past operations and waste disposals. Mr. Cann questioned the adequacy of the reports used for the FOST evaluation if such records have been lost or never existed.

Response: It is acknowledged that historic records are incomplete; however, the Navy has conducted due diligence with more than just the available records. The Navy's *Phase I EBS* of 18 Nov 96 evaluated the basewide conditions and identified RIAs based not only on a thorough review of the available records, but also through examination of historic aerial photographs, plans, and drawings; interviews with former base employees; and visual inspections of basewide property. The Navy is also conducting *EBS Phase II* investigations at over one hundred RIAs identified during the *Phase I EBS* (see enclosure [5]). Many of the investigations at these *Phase II* RIAs include the direct sampling of environmental media (e.g., soil, groundwater) to further understanding of site conditions.

After property transfer, the Navy will remain responsible for returning to NAS South Weymouth to address any currently undiscovered environmental concerns that are associated with the Navy's past operations.

4. Mr. Cann's letter of 7 Jun 01 stated that all possible testing and remediation should be completed prior to transfer, particularly for the presence of heavy metals and other toxins upgradient of the proposed transfer sites (many of which are in Rockland Open Space)

Response: The subparcels in this FOST include the portions of the base property that, in accordance with CERCLA and the MCP, have not had adverse environmental impacts from past Navy operations (or property that the Navy where the Navy has completed the necessary restorations/mitigations). These clean subparcels are deemed to be suitable to transfer to SSTTDC to support the planned redevelopment and beneficial/economic reuse by the communities. As described

in the FOST, the subparcels have been drawn with sufficient setback from upgradient sites that are currently being investigated such that there is no anticipated hazards for users of the transferred property. The Navy will complete the required investigations at the remaining sites at NAS South Weymouth and FOST/transfer those areas at a later date.

5. Mr. Cann's letter of 7 Jun 01 stated that "It is hard to understand how the Navy could propose that No Further Action is necessary to deal with the conditions documented in the FOST and that diligent inquiry preceded the report which finds that there are no unacceptable risks to human health or the environment with the following:
- The report on the data collected at French's Stream has not been written and it is not known when it will be.

Response: See the Response to Mr. Wilmot's Comment No. 2. French Stream is not included in this FOST.

- RIA 100 is within OS-A-2 and removal is planned but has not occurred. This area is now covered with dense foliage obstructing the view of materials on the parcel.

Response: Due to the Navy's ongoing investigations of RIA 100, subparcel OS-A-2 has been removed from the FOST.

- Cleanup of various properties in OS-C-1 has not been completed and some have been left to lessees to complete. Who is monitoring the lessees' handling of cleanup?

Response: Prior to transfer, the Navy will reach NFA agreements with EPA and MADEP prior for the few EBS sites in subparcel OS-C-1. No IR Program or ongoing MCP sites are located within subparcel OS-C-1. See the Navy's General Response No. 6 regarding solid waste debris.

- OS-R-1 is just 20 ft from the Old Swamp River which contains metal culverts and is an orange color. The FOST asserts that no impacts to OS-R-1 from these sites has (sic) been identified because NFA has been proposed for RIA 2A and any potential impacts associated with RIA 104 are likely to be limited to the immediate area of the river. How will it be determined that it definitely is limited to the area of the river? Is 20 ft not within the vicinity of the river? How and when will the debris in the area be addressed?

Response: Metal culverts are not an environmental hazard under CERCLA. See the Response to Mr. Wilmot's Comment No. 2 regarding the Navy's investigations for Old Swamp River. See also the Response to EPA's General Comment No. 6 regarding the increased set back of the FOST subparcels from Old Swamp River. See the Navy's General Response No. 6 regarding solid waste debris.

- OS-R-2 is also just 20 ft from the Swamp River and the Small Landfill is within 200 ft of the parcel. What is the condition of the sediment of the Swamp River? Does it flow into the parcel? What elements from the landfill might flow to the parcel?

Response: See the Response to Mr. Wilmot's Comment No. 2 regarding the Navy's investigations of Old Swamp River. The FOST/EBST has been clarified to indicate that Old Swamp River is not part of subparcel OS-R-2. See also the Response to EPA's General Comment No. 6 regarding the increased set back of the FOST subparcels from Old Swamp River.

Groundwater beneath the Small Landfill does flow toward subparcel OS-R-2. As documented in the Final ROD of Mar 02, the Navy and EPA have agreed on "No Action with Groundwater Monitoring" for the Small Landfill. The one-year of groundwater monitoring has been proposed to evaluate the potential existence and seasonal variability of thallium in groundwater at the site. Thallium was detected in only one groundwater sample from the site and is not likely to be related to the Small Landfill. More information about the sampling program, evaluations, and conclusions of the Navy's investigations at the Small Landfill area available for review at the CSO library in the final *Phase II RI* report and ROD.

- OS-R-3 is also 20 ft from the Swamp River and within 200 ft of various problem sites. While no impacts may be expected from RIA 1 and 2C, what guarantee is there that there will be none? When and how will the "general surface debris be addressed?" Of what, exactly, does it consist?

Response: See the Response to EPA's General Comment No. 6 regarding the increased set back of the FOST subparcels from Old Swamp River.

As stated in the Response to MADEP's EBST Comment No. 1 on OS-R-3, the subparcel has been redrawn to exclude the downgradient and adjacent areas to RIA 1.

The Navy's previous sampling data at RIA 2C indicated that the detected concentrations of herbicides are consistent with background concentrations and normal applications of herbicides. The Navy will be conducting an additional sampling round to confirm that NFA is required for RIA 2C. EPA Region I and MADEP are overseeing the Navy's investigations to ensure that they satisfy federal and state requirements.

See the Navy's General Response No. 6 regarding solid waste. Further descriptions of the types and locations of solid waste debris in the FOST subparcels have been added to the FOST [see enclosure (7)].

- OS-R-4 is also 20 ft from the Swamp River. Does the river flow onto this parcel? While "the extent of RIA 104 is believed (emphasis added) to be limited to the area of the river, what is "the area of the river" if not 20 ft? What is the "general debris" that is in this area and how and when will it be "addressed?" Information is that there used to be a gas station on this parcel and that benzene was detected in downgradient wells. Has this been re-tested?

Response: The FOST has been clarified to state/indicate that Old Swamp River is not part of OS-R-4. See the Response to Mr. Wilmot's Comment No. 2 regarding the Navy's investigations for Old Swamp River. See also the Response to EPA General Comment No. 6 regarding the increased set back of the FOST subparcels from Old Swamp River.

See the Navy's General Response No. 6 regarding solid waste. Further descriptions of the types and locations of solid waste debris in the FOST subparcels have been added to the FOST (see enclosure [7]).

The former gas station is believed to be in the area to be addressed as RIA 109, which is not part of Subparcel OS-R-4 or any other subparcel of this FOST. The Navy's investigation of RIA 109 is ongoing.

- OS-R-5 is just 20 ft from French's Stream, the contents of which have not been reported. What additional investigations/work is being done at RIA 7B and when will it be done? What is defined as the "immediate vicinity" of RIA 62? Exactly what is the "general surface debris" and how and when will it be addressed?

Response: See the Response to Mr. Wilmot's Comment No. 2 regarding the Navy's investigations of French Stream.

See the Navy's General Response No. 6 regarding solid waste. Further descriptions of the types and locations of solid waste debris in the FOST subparcels have been added to the FOST [see enclosure (7)].

In Jan 02, the Navy completed a final NFA Decision Document for RIA 7B (household debris along fenceline) which is available for review at the CSO library.

- SPUD-3 is 20 ft from the Swamp River. Does the river flow onto the property and what are the contents of the sediment of the river? How many wells are monitoring the quality of water on the parcel and how often are they tested? This parcel is within 200 ft of multiple RIAs.

Response: The FOST has been clarified to state/indicate that Old Swamp River is not part of SPUD-3. See the Response to Mr. Wilmot's Comment No. 2 regarding the Navy's investigations for Old Swamp River. See also the Response to EPA's General Comment No. 6 regarding the increased set back of the FOST subparcels from Old Swamp River.

Information regarding the number of wells/samples and sampling results in this area are available for review at the CSO library in the *Phase II RI* report for the Rubble Disposal Area (an adjacent area to SPUD-3).

As described in the EBST and enclosure (5), no impacts have been identified to SPUD-3 from the RIAs within 200 ft.

- SPUD-4 is within 20 ft of the Old Swamp River and within 200 ft of the Small Landfill, a rubble disposal area. How does water flow in this parcel and does it flow from the RIA areas?

Response: Groundwater in this area flows toward Old Swamp River. Detailed information regarding the groundwater flow regime in the area of the Small Landfill is presented in the final *Phase II RI* of Dec 00 for that site. The report is available for review at the CSO library.

No EBS RIAs are located in subparcel SPUD-4.

- SPUD-6. What is the exact acreage of this parcel? Because no impacts from nearby sites have been identified, does this mean there are none? What

investigation has occurred? Who is responsible to the Grantee if problems are identified after the FOST?

Response: The acreage of SPUD-6 is specified in the FOST and EBST. The Navy is addressing the known IR Program sites, MCP sites, and EBS RIAs at NAS South Weymouth. None of these sites is located within SPUD-6. The Navy has conducted a basewide *Phase I EBS* that included the property of SPUD-6. The Navy also has extensive investigations at nearby sites such as the Fire Fighting Training Area and the Tactical Air Navigation (TACAN) area. These documents are available for review at the CSO. After the FOST, the Navy is still the responsible property owner. After property transfer, the Navy will still be responsible to return to address any currently undiscovered environmental sites that are associated with past Navy operations.

- SR-R has been determined to be wetlands. How is the FOST coordinated with the Reuse plan when the plan cannot be effected as originally conceived? Has the Navy completed an Environmental Impact Statement acknowledging the uses for the properties under the Reuse Plan? What will occur if habitats and other factors require changes in the plan?

Response: See the Navy's General Response No. 1 regarding the presence of wetlands and the *Reuse Plan*. The Navy's EIS is ongoing.

- On Figure 2 showing FOST subparcels, there is a gap between SR-R and OS-R-5. What is the flow of water across the area between those parcels that is not part of the FOST? What are the features of the non-included parcel that are of concern for the abutting parcels?

Response: The gap between subparcels SR-R and OS-R-5 is due to the Navy's ongoing investigation of RIA 8 (former Building 70) and RIA 105 (potential former buildings near Taxiway C). The subparcels are located over 100 ft away from these sites and no hazards have been identified for users of subparcels SR-R or OS-R-5 from RIAs 8 or 105.

- Are there completed maps of storm drains on the base and are drains in non-FOST areas connected to FOST parcels?

Response: Maps of the storm drains for NAS South Weymouth are available in the CSO library. In some areas, drains from outside the subparcels of this FOST are connected to areas within the subparcels of this FOST.

- What are the risks associated with the removal of runways and the effect this might have on the wetlands? Will water cease to flow to those areas?

Response: Impacts resulting from the redevelopment will be evaluated in the SSTTDC's EIR.

- Where are the areas of "historic fill" and has it been tested?

Response: Unless part of the IR Program, MCP, or EBS program, historic fill has not been tested. See also the Response to EPA's Specific EBST Comment No. 38.

- With respect to buildings and surrounding soil that contains asbestos, lead, etc., removal should be done by the entity that is responsible for its installation.

Response: The Navy's policies for ACMs and LBP are described in the EBST.

- If the Grantee has a claim arising from DoD activities, what are its remedies? How will contribution be determined? Under what law? If the properties are transferred to the Grantee who conducts activities in connection with the Reuse plan and uncovers hazardous substances that ought to have been found prior to transfer, what are its remedies?

Response: After property transfer, the Navy will still be responsible to return to address any currently undiscovered releases of hazardous substances or petroleum products that are associated with the Navy's past operations. In such cases, the Grantee should contact the Navy EFANE, EPA Region I, and MADEP. Releases of petroleum products are typically handled under the MCP. Releases of other hazardous substances may be handled under CERCLA.

6. In Subparcel OS-R-3 there is a stream running in an easterly direction beginning from a culvert just northwest of the end of Union Street in Rockland and running into Swamp River. A 1953 drainage map at the Caretaker's Site Office indicates that the storm drains on the eastern half of the East Mat are the only source of discharge to this culvert. Can you indicate what contaminates [sic] it may contain from the East Mat? Will the culvert and the steam and any connected wetlands be tested for any contaminates [sic]?

Response: See the Navy's Response to MADEP's EBSL Comment No. 1 on OS-R-3.

7. Will the fencing debris located outside the perimeter fence along the southern portion of SPUD-4 be removed?

Response: See the Navy's General Response No. 6. Solid waste debris is being addressed separately from the FOST.

8. In the two acre parcel south of Spruce Street, will there be any testing for contaminants [sic]? Will any solid wastes located in these two parcels be removed prior to the transfer of the property?

Response: No sampling is planned for the Spruce Street Extension area as there are no suspected past releases of hazardous substances or petroleum products in that area. However, see the Response to Mr. Wilmot's Comment No. 2 regarding French Stream. See the Navy's General Response No. 6 regarding solid waste. See enclosure (7) for an inventory of the debris identified in this area.

COMMENTS FROM BETH SORTIN (3 Jun 01)

1. Ms. Sortin commented that there is no detailed plan for the cleanup of NAS South Weymouth and raised the concern that the Navy's only obligation is to clean up the CERCLA Sites.

Response: The BRAC Cleanup Team, consisting of the Navy, EPA Region I, and MADEP last updated the *BRAC Cleanup Plan for NAS South Weymouth* in Aug 98. The Navy acknowledges its responsibilities for the sites being addressed under CERCLA, the MCP, and the Navy's EBS program.

Under BRAC, the Federal Legislature voted to close NAS South Weymouth. Under BRAC, the DoD (Navy) is obligated to complete any required environmental restorations and transfer the property. At this time, the former NAS South Weymouth is listed on the federal NPL. Environmental investigations for sites on the NPL are addressed under the laws of CERCLA with the oversight of the EPA. The Navy's program to address CERCLA sites is under the IR Program. The status of ongoing investigations at IR Program sites is summarized in enclosure (3). At this time, NAS South Weymouth is also listed on the MCP under the oversight of MADEP. Enclosure (4) details the status of ongoing and completed investigations/restorations at MCP sites. Under BRAC, the Navy also completed a basewide (fenceline to fenceline) EBS from which over 100 RIAs have been identified for the Navy to address.

Enclosure (5) summarizes the status of each EBS RIA, some of which are to be addressed under CERCLA. The Navy and EPA have signed a FFA that outlines the procedures and responsibilities for environmental investigations at NAS South Weymouth under CERCLA.

No IR Program or active MCP sites are located on the FOST subparcels. The Navy, EPA, and MADEP have reached NFA agreements for most of the EBS RIAs located within the FOST subparcels. Only a few remaining EBS RIAs are located on the subparcel of this FOST. Before the transfer of the property containing an RIA, the Navy, the Navy will reach a NFA agreement with EPA and MADEP on the RIA(s).

2. Ms. Sortin commented that a five-year wildlife assessment needs to be completed, a final report on Spotted Turtles has not been issued, and no vernal pool certifications have been conducted. In addition, Ms. Sortin's previous requests for Entomological and Botanical studies have not been conducted.

Response: The Navy has conducted a spotted turtle study. The SSTTDC is currently conducting a vernal pool study. Wildlife assessment information will be included in the Navy's EIS and the SSTTDC's EIR, which are documents that will be used to support the base redevelopment (as opposed to the FOST, which is used to support the property transfer). However, the detailed entomological and botanical studies requested by the comment are typically not required.

COMMENTS FROM BETTY GIBBONS (5 Jun 01)

1. See attached letter.

Response: Ms. Gibbons' comments are addressed by the Navy's General Responses Nos. 1, 3, and 4.

COMMENTS FROM CAROLE MOONEY (6 Jun 01)

1. Ms. Mooney commented that the Navy's remediation of the Rockland property must be acceptable to the Rockland Board of Health and that remedial actions must be well underway or completed prior to transfer.

Response: The Navy is the lead agency for the environmental investigations at NAS South Weymouth. The Navy coordinates these investigations with the EPA Region I and MADEP, which have the role to verify that the Navy is

completing these investigations in accordance with federal, state, and local laws.

The only environmental investigation remaining to be completed in the FOST subparcels within Rockland is EBS RIA 7A (area of household debris along the fenceline). The Navy completed a draft NFA Decision Documents for RIA 7A in Jul 01 and has received EPA (letter of 15 Aug 01) and MADEP (verbal) concurrence. Before the transfer of the property containing RIA 7A, the Navy will issue a final NFA Decision Document to close that site. See the Navy's General Response No. 6 regarding solid waste debris areas.

2. Ms. Mooney commented that rubble disposal, landfill, and other sites adjacent to the FOST subparcels pose unacceptable safety hazards for recreational reuse of open space.

Response: These areas are not located on the FOST subparcels that are planned for transfer at this time. No impacts to the FOST subparcels have been identified for the adjacent areas. Areas that are not yet transferred will remain under the ownership of the Navy and the SSTTDC/public will not be allowed to use it for recreational use. See also the Navy's General Response No. 6 regarding safety hazards associated with debris.

COMMENTS FROM MARK PRIMACK (7 Jun 01)

1. Mr. Primack conveyed the Wildlands Trust Of Southeastern Massachusetts support for the designation of permanent conservation restrictions upon property proposed for transfer to the SSTTDC so that open spaces become a significant portion of the reuse plan.

Response: See the Navy's General Response No. 1. No conservation restrictions are required by the Navy. The approved *Reuse Plan* of Jan 98 specifies that 758 acres of the 1,450 acres at the base are for "Open Space/Recreation" reuse. The plan also indicates that 400 of these 758 acres are wetlands that would be preserved as natural habitat areas. It is the Navy's understanding that the SSTTDC has increased the total areas designated as wetlands based on the results of their recent wetlands delineation project.

COMMENTS FROM BRIAN REID (7 Jun 01)

1. Mr. Reid commented that the transfer of the property should be delayed because the first step should be to evaluate the site-wide environmental conditions, limitations

(e.g., wetlands, habitat, rare/significant species), reuse plans, and infrastructure needs (e.g., Route 3 connector road). Mr. Reid commented that a piecemeal conveyance will result in an unplanned approach to the redevelopment.

Response: See the Navy's General Responses Nos. 1 and 2. The Navy's goal is to render the entire base suitable for transfer as soon as possible (this FOST documents which portions of the base are deemed to be suitable for transfer at this time) and then proceed with the transfer to SSTTDC as soon as they are ready to accept the property and other required transfer documents (e.g., NEPA ROD) have been completed. The SSTTDC will conduct the redevelopment in accordance with the *Reuse Plan* which has outlined the guiding plan for all property at the main base. Public concerns about the specifics of the SSTTDC's redevelopment of the base should be directed toward the SSTTDC.

2. Mr. Reid commented that there is no wildlife or resource studies available to evaluate the significance of subparcels designated for reuse as open space.

Response: See the Navy's General Response No. 1. The wetland, wildlife, and habitat studies must be completed before the SSTTDC development but not prior to the FOST. These studies are completed as part of the Navy's EIS and the SSTTDC's EIR. The FOST is the Navy's determination that the subject subparcels are suitable for transfer with respect to CERCLA (i.e., no unacceptable risks to human health or the environment resulting from releases of hazardous substances). The Navy's investigations under CERCLA evaluate the potential risks from the investigations sites to both human and ecological receptors.

3. Mr. Reid stated that "the Navy bears a certain level of responsibility to go beyond the minimum requirement of environmental hazard cleanup, and participate in some of the site restoration. Granted the site cannot be brought back to anything even closely resembling its original condition, however restoration of degraded wetlands and waterways such as French's Stream, for example, would go a long ways towards flood remediation downstream, self-remediation of any contaminants not yet detected, stormwater management and wetland mitigation needed for any subsequent redevelopment of the larger site, habitat improvement, and most importantly would boost the public's confidence in the service and its accountability."

Response: The Navy will conduct environmental investigations and restorations, as required, for the

conditions at the base associated with past Navy operations in accordance with federal, state, and local laws/regulations. BRAC funds are not available to support improvement or redevelopment activities.

To date, the Navy has not identified significant degradation of French Stream; however, the Navy is mitigating problems identified at the TACAN outfall which discharges to French Stream. See the Response to Mr. Wilmot's Comment No. 2 regarding the status of RIA 62 (French Stream).

4. Mr. Reid recommended that the Navy has not recently conducted a 5-year update of the natural resources management plan. Mr. Reid commented that, prior to transfer, the Navy should commit to a basewide evaluation of natural resources, including the proposed connector road to Route 3, or require that such be performed by any party to whom lands are to be conveyed.

Response: The Navy's natural resources management plans pertain to active facilities. Because NAS South Weymouth has been closed and will be transferred, evaluations of potential impacts to natural resources resulting from the future redevelopment are the responsibility of the SSTTDC and will be addressed as part of their EIR.

5. Mr. Reid recommended that, prior to transfer, the Navy designates a permanent conservation restriction upon parcels conveyed for public benefit prior to conveyance to SSTTDC. Conservation restrictions should run to the towns, the state, or a private non-profit conservation organization, and would ensure that the public benefit conveyance will remain in the public trust.

Response: See the Navy's General Response No. 1. The *Reuse Plan* has been approved by the communities and State. Open space areas are included in the zoning. Conservation restrictions are not required by the Navy for the transfer of the property.

ADDITIONAL CHANGES TO THE FOST

The following additional revisions were made to the FOST based on further Navy reviews of the available information and are not based on comments received on the draft FOST:

1. Building 52 (former High Explosives Magazine) has been added to the discussion of Subparcel OS-C-1. This small bunker was mistakenly omitted from the draft FOST. No environmental concerns were identified for Building 52 from the *Phase I EBS* of 18 Nov 96, the *PIH Survey* of Aug 01, or the recent site walks. The building is currently empty. Therefore, Building 52 is deemed to be suitable for transfer.
2. The EBST section on lead in drinking water fountains discusses the Navy's 1992 sampling event. The text has been revised to indicate that the action level evaluated at the time of the sampling event was 35 ug/L, not 15 ug/L. However, the sample results for the remaining water fountains in the buildings contained within this FOST (concentration ranging from "below method detection limit" to 6 ug/L) do not exceed the current action level of 15 ug/L.
3. The FOST has been clarified to state/indicate that the FOST subparcels that are located around the perimeter of the base extend to the Navy's property line (which typically extends a few feet beyond the current base fenceline).
4. The Navy property south of Spruce Street has been separated from Subparcel OS-R-5 and made into its own FOST subparcel (designated Subparcel SSE) because it is not part of the open space zoned for the SSTTDC's redevelopment as outlined in the *Reuse Plan*. The portion of the Spruce Street Extension property that is just a Navy easement has also been removed from the FOST. The extent of the Navy's property on the Spruce Street Extension has been corrected.
5. The map for Subparcel OS-W-2 has been clarified to indicate that RIA 50 (Child Care Center) is located outside (abutting) the subparcel. The investigation for RIA 50 was conducted for soil around Building 128, and not within the wooded area that is included in Subparcel OS-W-2.
6. Subparcel B-1W-1 has been renamed to B1-W-1 in order to better match the *Reuse Plan* designation for that zoning parcel area.

7. The mapped extents of EBS RIAs 46 (Barracks) and 109 (Background sample location BG-07) have been clarified in the EBST figures (the draft EBST figures depicted generalized extents for these RIAs). RIA 46 partially overlaps subparcel SR-W-1. RIA 109 is outside of, but within 200 ft of, a FOST subparcel. The extent of RIA 109 was corrected to include the location of the former gas station (west of Union Street) and the location of the background well (east of Union Street). RIA 46 was corrected to indicate the areas of the completed geophysical survey and excavations.
8. The southeast and north boundaries of Subparcels OS-W-1 and OS-W-2 have been corrected. These removed portions of the subparcels were already transferred as part of the USCG Housing Area.
9. The common boundary between subparcels OS-C-1 and SPUD-1 has been corrected to better match the actual zoning designation. As a result, Building 113 (Field House Head) is now located in Subparcel OS-C-1 rather than SPUD-1.
10. The perimeter fenceline depicted in the EBST figures has been modified to more accurately represent its location. In support of the pending property transfer process, the Navy is currently working to develop survey legal descriptions of the base property line which may be a few feet outside of the existing fenceline in some areas. As stated in the FOST/EBST, the subparcels along the fenceline extend to the property line.
11. Enclosure (7) (solid waste inventory) has been updated. Many debris areas have been removed since the draft FOST.

Enclosure (7) - Solid Waste Inventory for the FOST for 22 Subparcels

<i>Subparcel</i>	<i>Description</i>	<i>Approx CY</i>	<i>Alias</i>	<i>Status</i>	<i>Notes</i>	<i>DEP Comment</i>
B-1W-1	asphalt, concrete, metal	100	Perimeter Rd Asphalt Pile	present	--	OS-C-1 #4, 21 Feb 02
B-1W-1	barbed wire coil	0	--	to be removed	--	21 Feb 02
B-1W-1	canister (for weed killer, empty)	0	--	REMOVED	no indication of a release	B-1W-1 #2, OS-C-1 #4
B-1W-1	concrete w/ rebar	10	--	present	--	21 Feb 02
B-1W-1	drum (55-gallon, empty)	0.1	--	to be removed	possible makeshift BBQ	21 Feb 02
B-1W-1	litter (roadside)	1	--	present	bridge area; non-Navy	B-1W-1 #3
B1-W-1	concrete w/ rebar	20	--	present	--	--
B1-W-1	litter (roadside)	0	--	present	non-Navy	--
INST-1	ABC	3	--	present	--	21 Feb 02
INST-1	concrete, wood, debris	4	--	present	--	INST-1 #2, 21 Feb 02
INST-1	tarp	0.2	--	REMOVED	--	--
OS-A-1	barbed wire coil	0	--	REMOVED	--	OS-A-1 #3
OS-A-1	bucket (5-gal, empty), oil filter	0	--	REMOVED	--	--
OS-A-1	car tire, oil filter	0.1	--	REMOVED	--	--
OS-A-1	concrete, lumber	2	--	present	--	OS-A-1 #1, 21 Feb 02
OS-A-1	litter (side of RR track)	0.2	--	present	non-Navy	--
OS-A-1	litter-trespass (bottles, etc.)	1	--	present	non-Navy	--

<i>Subparcel</i>	<i>Description</i>	<i>Approx CY</i>	<i>Alias</i>	<i>Status</i>	<i>Notes</i>	<i>DEP Comment</i>
OS-C-1	ABC, rebar, pipe, tiles, tarp	80	--	REMOVED NON-ABC	--	OS-C-1#2,#6, 21 Feb 02
OS-C-1	asphalt	5	--	present	--	OS-C-1 #6, 21 Feb 02
OS-C-1	canister (empty)	0	--	REMOVED	no indication of a release	--
OS-C-1	canister (empty)	0	--	REMOVED	no indication of a release	--
OS-C-1	canisters (empty)	0.1	--	REMOVED	RIA 52 ongoing	OS-C-1 #1
OS-C-1	concrete block (3 ft long)	0.1	--	present	--	21 Feb 02
OS-C-1	concrete vault w/ elec cond	2	--	present	no hazards identified	--
OS-C-1	concrete vault w/ elec cond	2	--	present	no hazards identified	--
OS-C-1	hose (garden)	0	--	to be removed	--	letter of 3/1/02
OS-C-1	metal (vehicle track)	0.1	--	to be removed	--	21 Feb 02
OS-C-1	metal (vehicle track)	0.1	--	to be removed	--	21 Feb 02
OS-C-1	metal debris	5	--	REMOVED	--	OS-C-1 #1
OS-C-1	rebar (18"), elec conduit (4")	0.1	--	present	protruding from ground	OS-C-1 #8
OS-C-1	sm. mound w/ battery casing	10	--	present	--	--
OS-C-1	tiles, ash at concrete slab	2	--	REMOVED	removed debris & slab; sample results ok	OS-C-1 #2
OS-C-1	wood (railroad ties)	0.5	--	present	--	21 Feb 02
OS-C-2	asphalt	2	--	present	--	21 Feb 02
OS-C-2	metal rail (15 ft long)	0.2	--	to be removed	--	--
OS-R-1	asphalt	2	SWF1-09	present	--	OS-R-1 #1, 21 Feb 02
OS-R-1, SPUD3	ABC, metal & domestic debris	3	SWF1-10-13	REMOVED NON-ABC	--	OSR1#1,SPUD3#2, 21 Feb 02

<i>Subparcel</i>	<i>Description</i>	<i>Approx CY</i>	<i>Alias</i>	<i>Status</i>	<i>Notes</i>	<i>DEP Comment</i>
OS-R-2	C&D, stumps	5	SWF1-01	REMOVED C&D	removal on-hold due to box turtle	OS-R-2 #2
OS-R-2	car exhaust pipe	0	--	REMOVED	--	OS-R-2 #5
OS-R-3	barbed wire coil	0	--	REMOVED	--	OS-R-3 #2
OS-R-3	concrete fence post	0.1	--	present	--	21 Feb 02
OS-R-3	metal cookware, pails, glass bottle	3	--	REMOVED	similar to debris at RIA 52	OS-R-3 #5
OS-R-3	metal debris, barbed wire coil	2	--	REMOVED	--	OS-R-3 #1, #2
OS-R-3	pipe (drainage)	1	--	to be removed	--	SR-R #2?, 21 Feb 02
OS-R-4	car tires, canisters, metal debris	0	SWF1-04-06, Tire Alley	REMOVED	--	--
OS-R-4	drum(32-gal),bucket(5-gal)(empty)	0	SWF1-03	REMOVED	--	--
OS-R-5	asphalt	2	--	present	--	21 Feb 02
OS-R-5	asphalt, arresting gear	1	--	REMOVED NON-ABC	near SWF2-14	21 Feb 02
OS-R-5	barbed wire coil	0	--	REMOVED	--	OS-R-5 #4
OS-R-5	buckets (5-gal, empty), misc debris	0	SWF3-02	REMOVED	--	--
OS-R-5	canisters(1gal), buckets,fenceposts	2	--	REMOVED	at location of EBS RIA 7A	OS-R-5 #1, #6
OS-R-5	car door	0	SWF2-10	REMOVED	--	--
OS-R-5	coaxial antenna cable	0.1	--	could not locate	--	OS-R-5 #5
OS-R-5	concrete	1	--	present	--	OS-R-5 #3,#5, 21 Feb 02
OS-R-5	drum (35-gallon, empty, partial)	0.1	--	REMOVED	--	--
OS-R-5	drum (55-gallon, empty), metal	0	SWF2-11	REMOVED	at location of former EBS RIA 7B	--

<i>Subparcel</i>	<i>Description</i>	<i>Approx CY</i>	<i>Alias</i>	<i>Status</i>	<i>Notes</i>	<i>DEP Comment</i>
OS-R-5	drum (55-gallon, empty, partial)	0.1	--	REMOVED	--	--
OS-R-5	drum (empty, crushed)	0.1	--	REMOVED	--	--
OS-R-5	fencing material	0	SWF2-12	REMOVED	--	OS-R-5 #6
OS-R-5	foundation, firepit, fencing	3	--	present	non-Navy structure	--
OS-R-5	litter	1	--	present	non-Navy	--
OS-R-5	litter, concrete foundation	0	SWF3-03, 04	REMOVED NON-ABC	foundation may be from ice house	--
OS-R-5	pipe	0.1	--	present	--	--
OS-R-5	sonor buoy tube	0.1	--	REMOVED	--	--
OS-R-5	sonor buoy tubes	0	SWF2-13	REMOVED	--	--
OS-R-5	sonor buoy tubes	0	SWF2-14	REMOVED	--	--
OS-R-5	steel cable	0.1	--	REMOVED	--	OSR5#5(SPUD7#2?), 21Feb02
OS-R-5	steel cable, riprap	0.1	--	REMOVED	--	OS-R-5 #5, 21 Feb 02
OS-R-5	TV sets (2)	0.3	--	REMOVED	--	--
OS-W-1	bucket	0	--	REMOVED	--	--
OS-W-1	canister (for auto oil, empty)	0	--	REMOVED	no indication of a release	OS-W-1 #1
OS-W-1	car gas tank	0.2	--	REMOVED	no indication of a release	OS-W-1 #2
OS-W-1	car tires (2), card table (1)	0.3	--	REMOVED	--	OS-W-1 #2
OS-W-1	car tune-up debris	0.1	--	REMOVED	--	OS-W-1 #1
OS-W-1	car tune-up debris	0.1	--	REMOVED	--	OS-W-1 #1
OS-W-1	car tune-up debris, domestic litter	0.1	--	REMOVED DEBRIS	non-Navy; waste oil contained in bottles	OS-W-1 #2, #3

<i>Subparcel</i>	<i>Description</i>	<i>Approx CY</i>	<i>Alias</i>	<i>Status</i>	<i>Notes</i>	<i>DEP Comment</i>
OS-W-1	concrete rubble	6	--	present	appears to be painted gray	OS-W-1 #2, 21 Feb 02
OS-W-1	drum (35-gallon, empty, partial)	0.1	--	REMOVED	--	OS-W-1 #1
OS-W-1	foundation	5	--	present	non-Navy structure	--
OS-W-1	kitchen sink	0.4	--	REMOVED	--	--
OS-W-1	litter	1	--	present	--	--
OS-W-1	misc. debris (wood, ropes, litter)	1	--	REMOVED	treehouse-like debris	--
OS-W-1	yard waste, bucket (5-gal for tar)	2	--	present	--	OS-W-1 #2
OS-W-2	ABC	2	SWF2-07	present	--	21 Feb 02
OS-W-2	ABC	3	--	present	--	21 Feb 02
OS-W-2	ABC	5	SWF2-06	present	--	OS-W-2 #1, 21 Feb 02
OS-W-2	concrete, metal debris	7	--	present	berm in wooded area	OS-W-2 #1
OS-W-2	foundation	30	SWF2-08	present	non-Navy structure	--
OS-W-2	foundation (brick, concrete, metal)	15	--	present	non-Navy structure	--
OS-W-2	foundation (stone, brick, concrete)	15	--	present	non-Navy structure	--
OS-W-2	litter-trespass (bottles, etc.)	0.1	--	REMOVED NON-ABC	non-Navy trespass litter	--
OS-W-2	metal debris	2	--	REMOVED	--	--
OS-W-2	pipe (4" steel)	0.1	SWF2-09	present	--	OS-W-2 #3
OS-W-2	roofing felt roll	0.1	--	could not locate	--	OS-W-2 #1
OS-W-2	wood, metal, concrete	2	--	present	--	21 Feb 02
OS-W-2	yard waste	5	--	present	non-Navy (from USCG Housing)	--

<i>Subparcel</i>	<i>Description</i>	<i>Approx CY</i>	<i>Alias</i>	<i>Status</i>	<i>Notes</i>	<i>DEP Comment</i>
Spruce St Ext	ABC	2	--	present	--	21 Feb 02
Spruce St Ext	asphalt shingles	1	--	to be removed	--	--
Spruce St Ext	metal	0.1	--	to be removed	--	--
Spruce St Ext	metal	0.1	--	to be removed	--	--
Spruce St Ext	metal, windows	3	--	to be removed	--	--
Spruce St Ext	metal, wood posts	0.2	--	to be removed	--	--
Spruce St Ext	tire	0.1	--	to be removed	--	--
Spruce St Ext	tire	0.1	--	to be removed	--	--
SPUD-1	wood (one pallet, two 2"x8'x8')	1	--	present	--	OSC1#12,SPUD1#3 ,21 Feb 02
SPUD-3	microwell (broken)	0	--	present	--	--
SPUD-3	misc. debris	0.1	--	present	--	--
SPUD-4	ABC	20	SWF1-02	present	within berms	SPUD-4 #3, 21 Feb 02
SPUD-4	car tire	0.2	--	REMOVED	--	SPUD-3 #6
SPUD-4	drum (5-gallon, empty), steel cable	0	SWF1-07	REMOVED	--	SPUD-4 #6
SPUD-5	C&D	5	--	REMOVED	--	SPUD-5 #1
SR-R	barbed wire coil	0	--	REMOVED	--	SR-R #1
SR-R	car tire	0.1	--	REMOVED	--	--
SR-R	litter, fence debris, rebar	2	--	REMOVED REBAR	--	SR-R #2
SR-R	metal rod	0	--	REMOVED	possible guy wire base	SR-R #1
various	barbed wire coils	1	--	REMOVED	unrecorded locations along perimeter fence	various

<i>Subparcel</i>	<i>Description</i>	<i>Approx CY</i>	<i>Alias</i>	<i>Status</i>	<i>Notes</i>	<i>DEP Comment</i>
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A = Abington ABC = asphalt/brick/concrete B = business C = clear zone CD = construction and demolition CY = cubic yards
DEP = Department of Environmental Protection NFA = no further action OS = open space R = Rockland RIA = Review Item Area
SPUD = special planned use district SR = senior residential SWF = solid waste file W = Weymouth

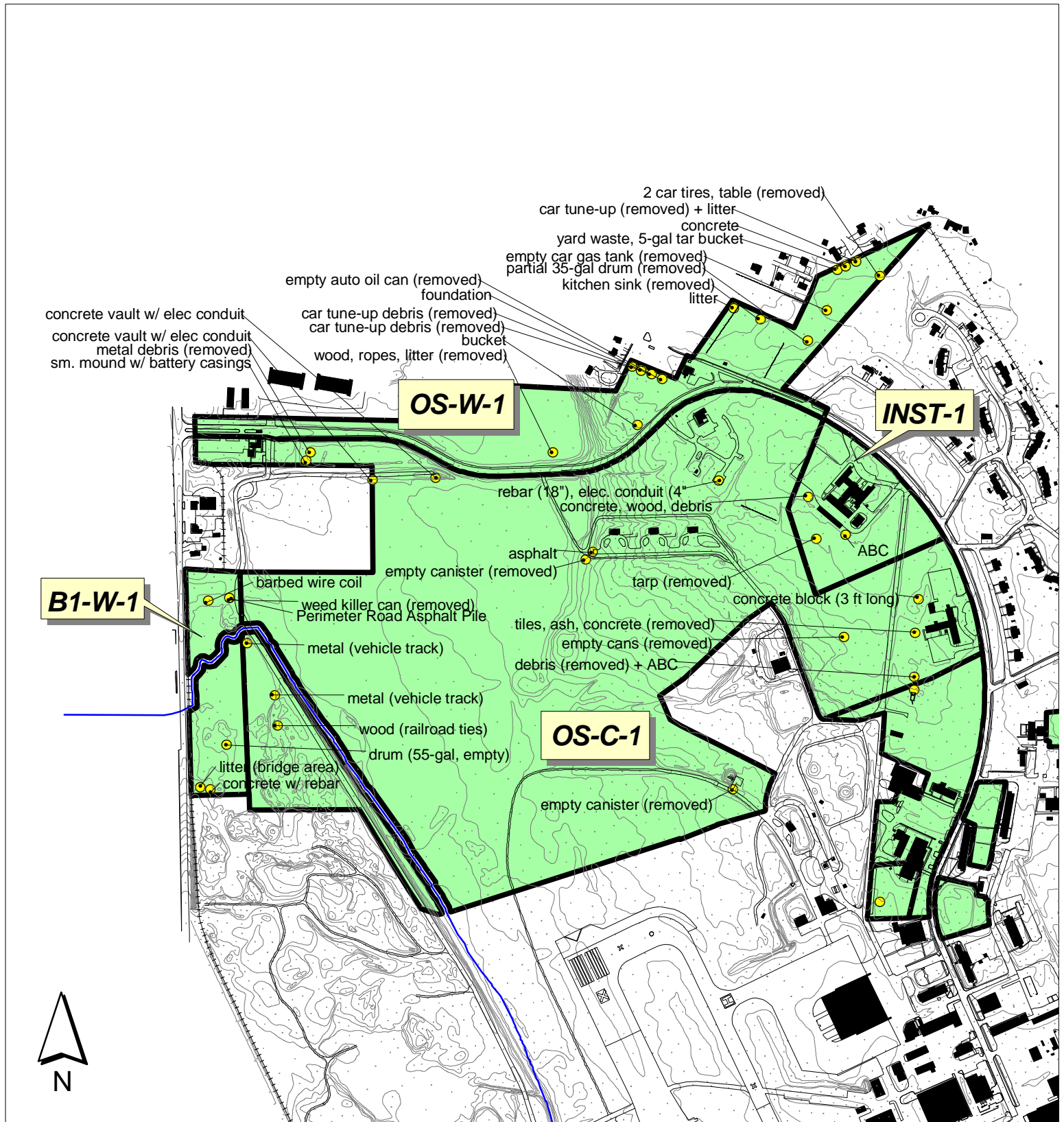
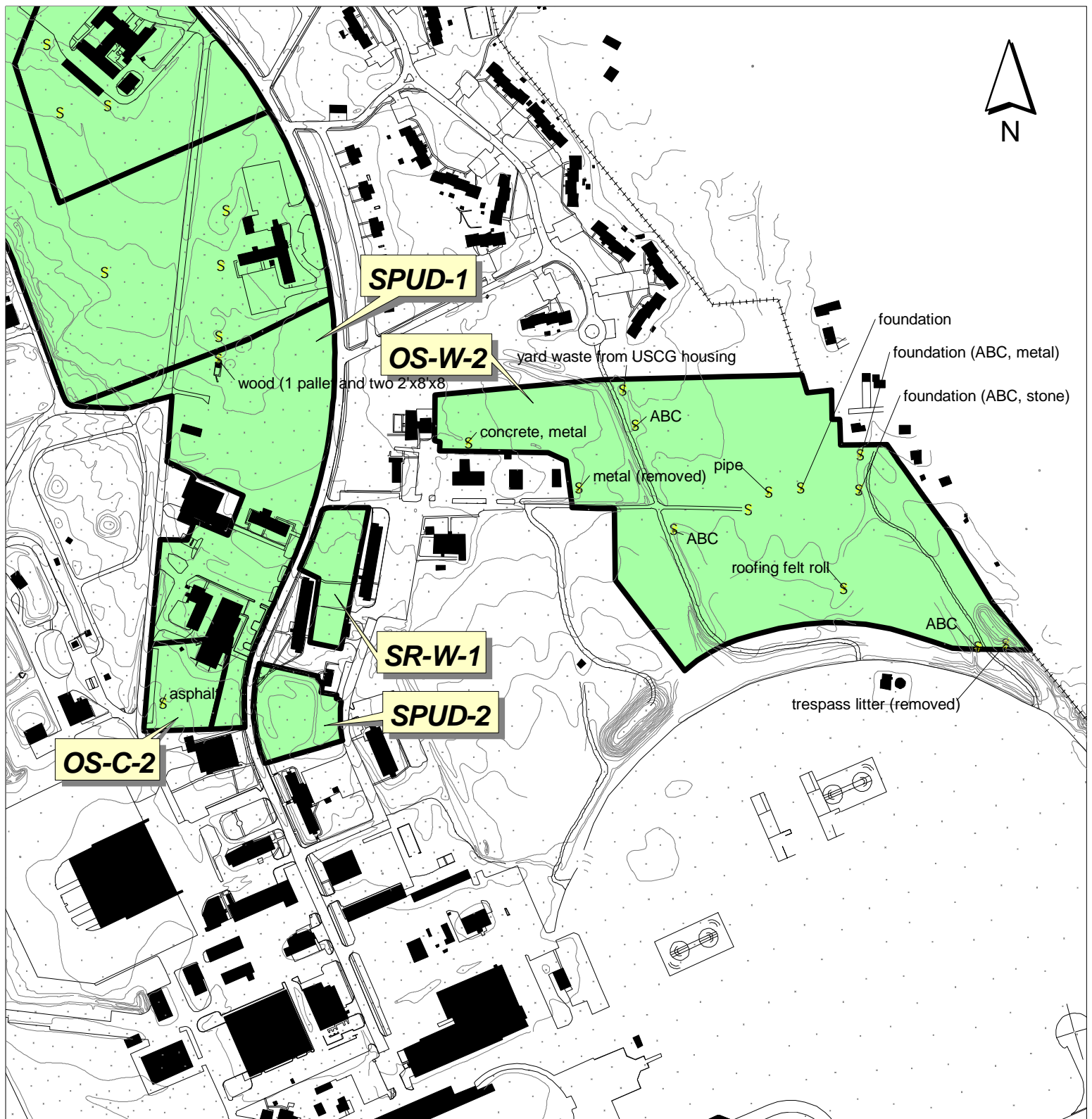


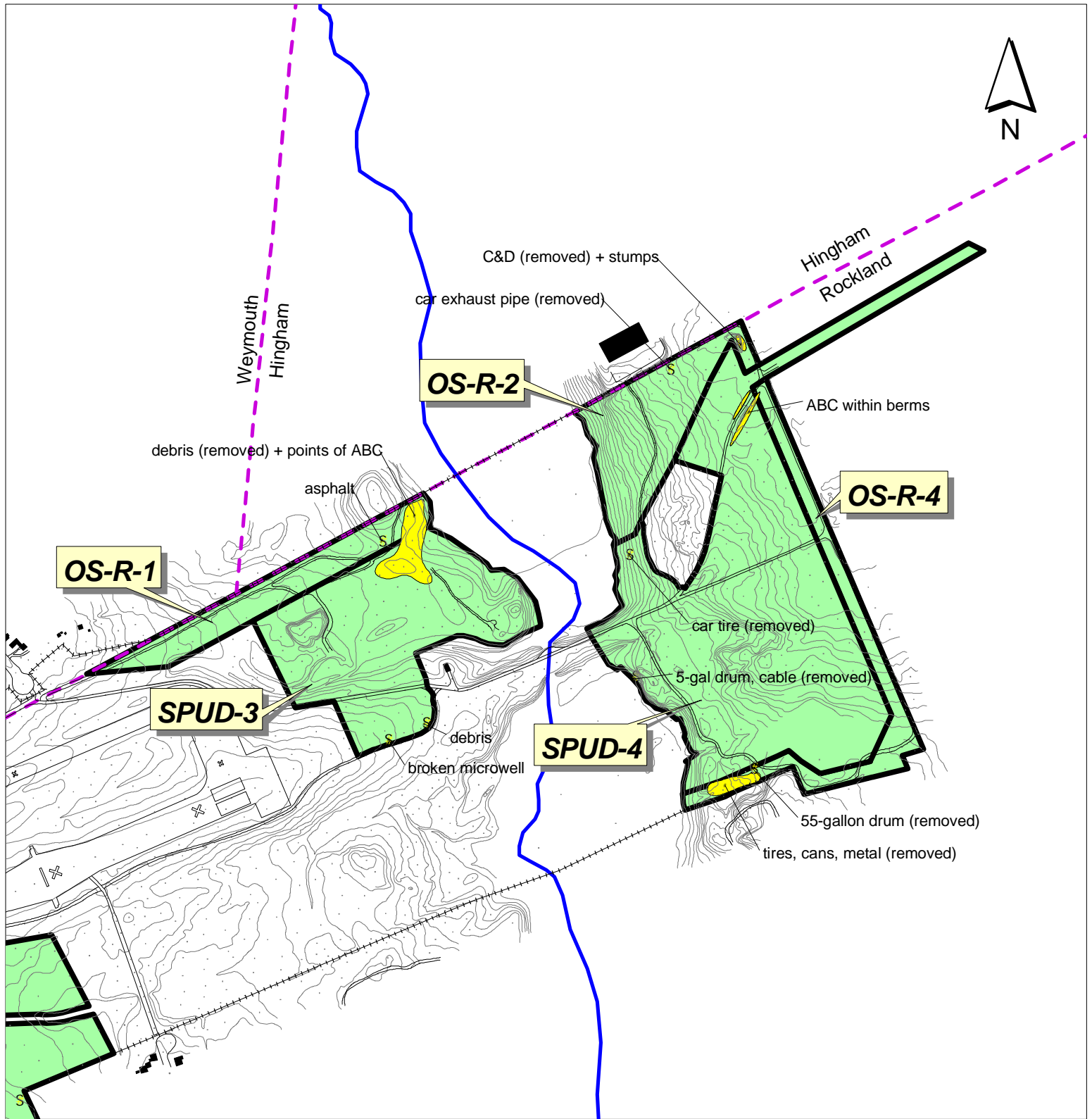
Figure A
Solid Waste Debris in
FOST Subparcels B1-W-1,
INST-1, OS-C-1, and OS-W-1

- Property Fenceline
- Roads & Pavement
- French Stream
- Topographic Contours
- Solid waste debris in FOST (approx. locations, not to scale)
- Buildings & Facilities
- FOST Subparcels



- Property Fenceline
- Roads & Pavement
- Topographic Contours
- Solid waste debris in FOST (approx. locations, not to scale)
- Buildings & Facilities
- FOST Subparcels

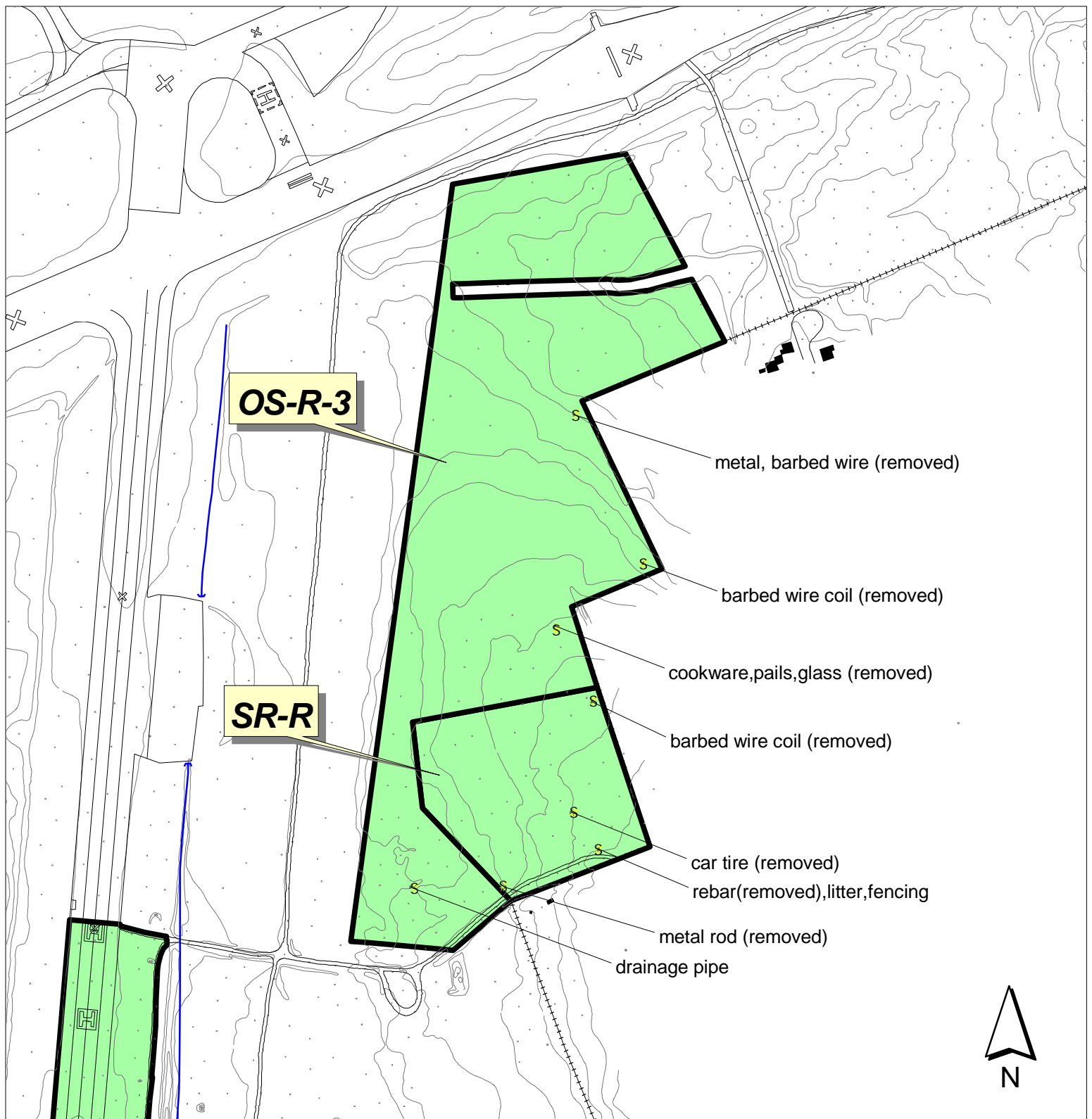
Figure B
Solid Waste Debris in
FOST Subparcels OS-C-2,
OS-W-2, SPUD-1, SPUD-2, and SR-W-1



500 0 500 1000 Feet

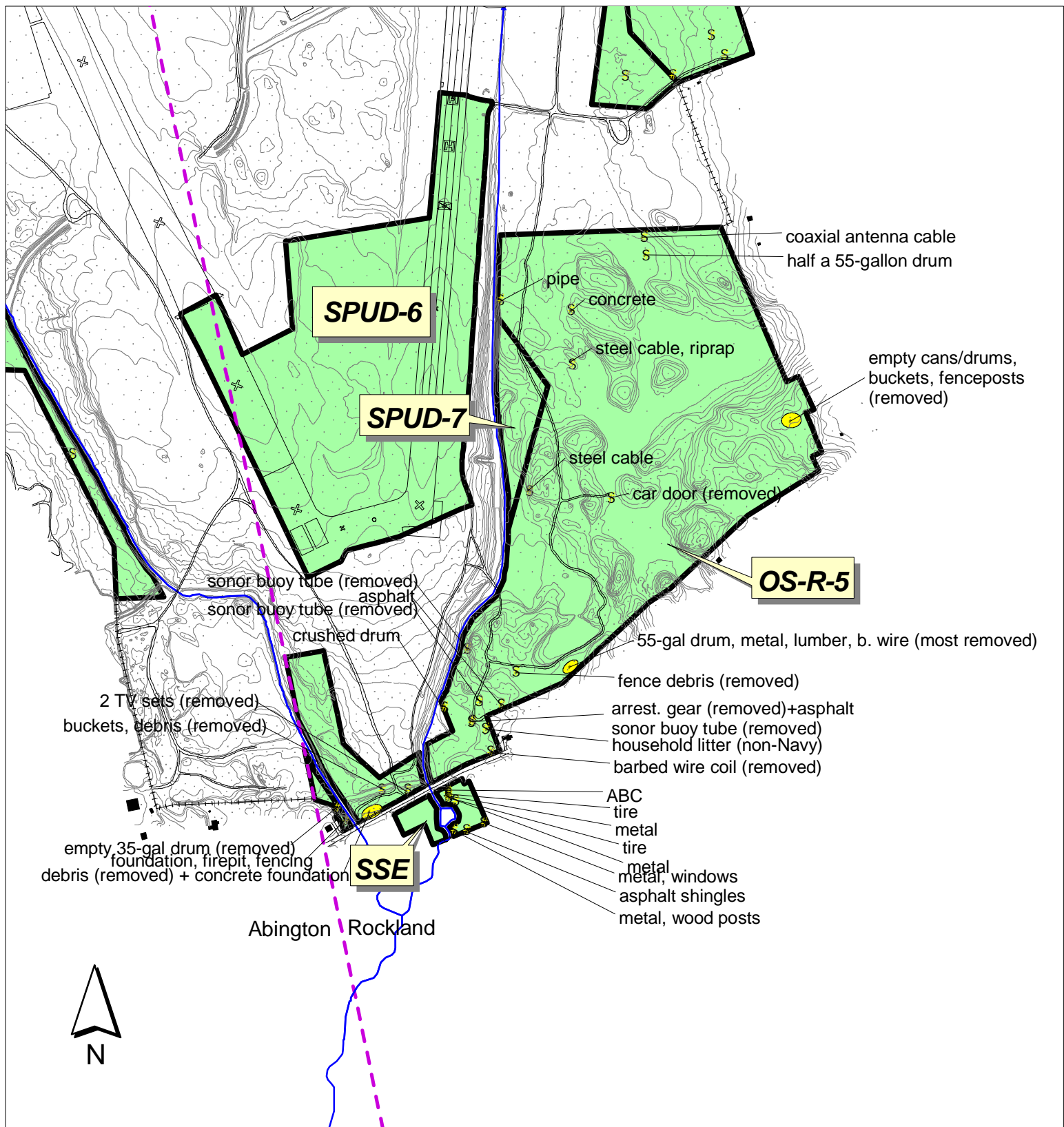
- Property Fenceline
- Roads & Pavement
- Old Swamp River
- Town Lines
- Topographic Contours
- Solid waste debris in FOST (approx. locations, not to scale)
- Buildings & Facilities
- FOST Subparcels

Figure C
Solid Waste Debris in
FOST Subparcels OS-R-1,
OS-R-2, SPUD-3, and SPUD-4



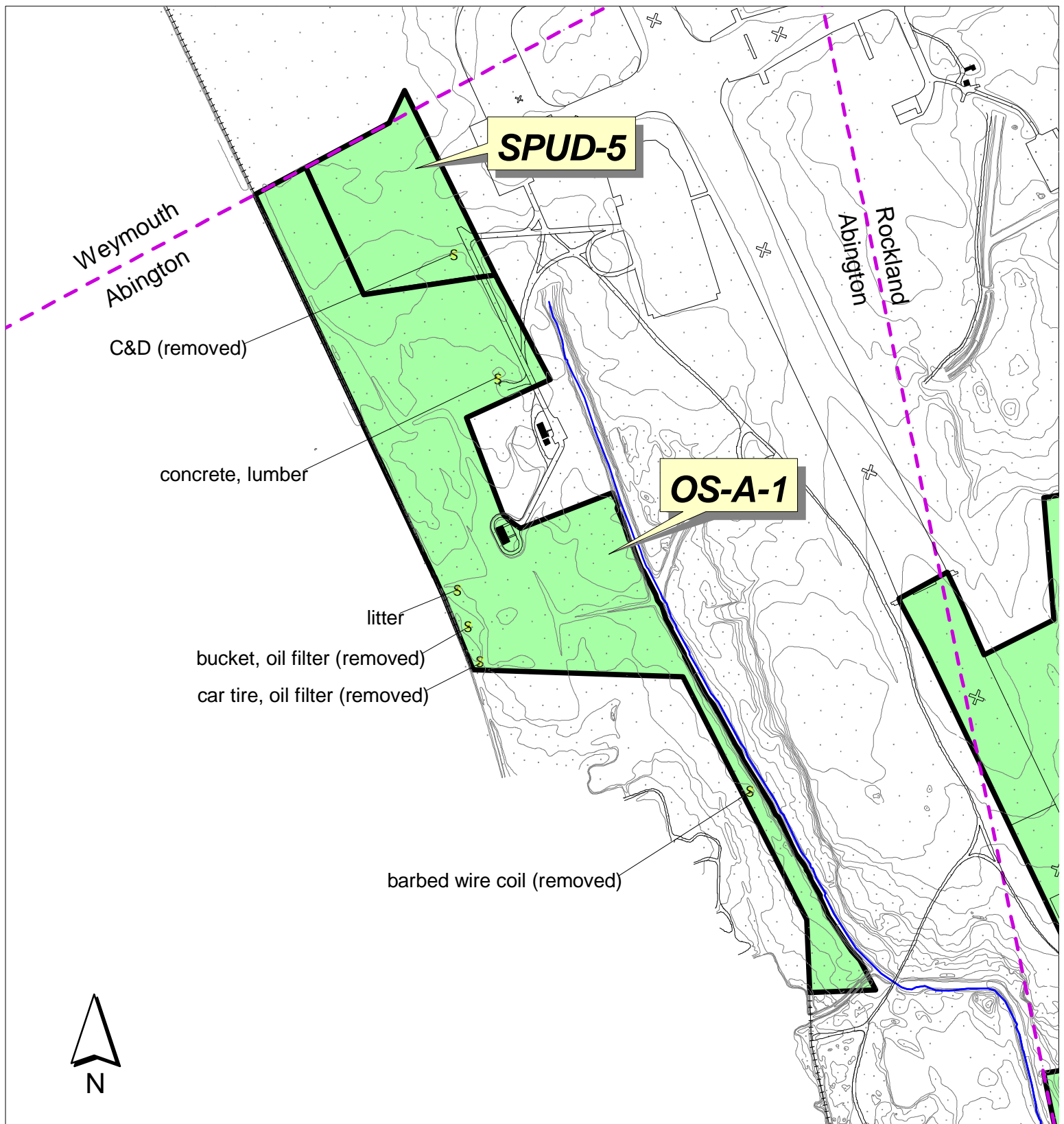
- Property Fenceline
- Roads & Pavement
- French Stream
- Topographic Contours
- Solid waste debris in FOST (approx. locations, not to scale)
- Buildings & Facilities
- FOST Subparcels

Figure D
Solid Waste Debris in
FOST Subparcels OS-R-3
and SR-R



- Property Fenceline
- Roads & Pavement
- French Stream
- Town Lines
- Topographic Contours
- Solid waste debris in FOST (approx. locations, not to scale)
- Buildings & Facilities
- FOST Subparcels

Figure E
Solid Waste Debris in
FOST Subparcels
OS-R-5, SPUD-6, SPUD-7, and SSE



- Property Fenceline
- Roads & Pavement
- French Stream
- Town Lines
- Topographic Contours
- Solid waste debris in FOST (approx. locations, not to scale)
- Buildings & Facilities
- FOST Subparcels

Figure F
Solid Waste Debris in
FOST Subparcels
OS-A-1 and SPUD-5