



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
Code EV2/MD

MEMORANDUM FOR THE RECORD

Subj: FINDING OF SUITABILITY TO TRANSFER (FOST), FOR SEVEN ZONING SUBPARCELS DESIGNATED AS INST-2, OS-C-3, OS-C-4, SPUD-8, SPUD-9, SPUD-10, AND THE TROTTER ROAD EXTENSION (70.05 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) Zoning and Land Use By-Laws for NAS South Weymouth, as approved by the NAS Planning Committee on 24 Mar 98.
(c) Community Environmental Response Facilitation Act (CERFA) Determination Report, NAS South Weymouth, Massachusetts of 28 Mar 97.
(d) Final Basewide Environmental Baseline Survey (EBS) Phase I, NAS South Weymouth, Massachusetts of 18 Nov 96.
(e) Phase I EBS Report Errata of 10 Nov 97.
(f) Base Realignment and Closure (BRAC) Cleanup Plan (BCP), NAS South Weymouth, Massachusetts of Aug 98.

Encl: (1) Environmental Baseline Survey to Transfer (EBST) for Seven Zoning Subparcels Designated INST-2, OS-C-3, OS-C-4, SPUD-8, SPUD-9, SPUD-10, and the Trotter Road Extension (70.05 total acres) at the former NAS South Weymouth, Massachusetts.
(2) Environmental Covenants, Conditions, Reservations, and Restrictions for Seven Zoning Subparcels Designated INST-2, OS-C-3, OS-C-4, SPUD-8, SPUD-9, SPUD-10, and the Trotter Road Extension (70.05 total acres) at the former NAS South Weymouth, Massachusetts.
(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) Summary of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Areas of Concern (AOCs).
(7) Responsiveness Summary.
(8) Solid Waste Inventory.

1. I have reviewed the Environmental Baseline Survey to Transfer (EBST), enclosure (1), for the seven zoning subparcels that are the subject of this Finding of Suitability to Transfer (FOST) and are designated as INST-2, OS-C-3, OS-C-4, SPUD-8, SPUD-9, SPUD-10, and the Trotter Road Extension (TRE) 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 (SSTTDC). A summary of the subject subparcels of this FOST and their planned redevelopment by the SSTTDC is as follows:

TABLE 1 - SUMMARY OF ZONING SUBPARCELS INCLUDED IN THIS FOST

Zoning Sub-parcels¹	Township	Current Buildings/Structures within the Subparcels	Proposed Reuse²	Area (acres)³
INST-2	Weymouth	Shea Memorial Drive	Roadway	1.15
OS-C-3	Weymouth	Shea Memorial Drive	Roadway	0.98
OS-C-4	Weymouth	Building 90/3 (aviation gasoline separator) Runway and taxiway	Open Space, including playing fields in accordance with SSTTDC's current Master Plan	35.00
SPUD-8	Weymouth	Building 51 (magazine) Building 99 (transformer house) Building 102 (Navy Exchange) Portion of Building 103 (dining)	Office and research and development (R&D) use ⁴ in accordance with SSTTDC's current Master Plan	8.28
SPUD-9	Weymouth	Building 17 (reserve center) Building 20 (transient housing) Building 75 (barracks) ⁵ Building 103 (dining) Building 106 (transformer house) Building 115 (bachelor enlisted quarters)	Office and R&D use ⁴ in accordance with SSTTDC's current Master Plan	9.27
SPUD-10	Weymouth	Runway and taxiway	Office and R&D use ⁴ in accordance with SSTTDC's current Master Plan	14.18
TRE	Weymouth	Trotter Road	Roadway	1.19
TOTAL				70.05

NOTES:

1. The subparcel acronyms are defined as follows: C = Central, INST = Institutional, OS = Open Space, SPUD = Special Planned Use District, and TRE = Trotter Road Extension.
2. As approved in the Reuse and Zoning Plans, references (a) and (b).
3. Approximate areas (a real estate survey will be completed as part of the property transfer process).
4. As outlined in reference (a) and Exhibit E of reference (b), the following uses that are permitted in SPUD areas include: Medical, Recreational, Business, R&D, 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.
5. Approximately 0.6 acres of Subparcel SPUD-9, which contains the north end of Building 75 and the sidewalk east of Shea Memorial Drive, extend into the adjacent "SR-W" (Senior Residential - Weymouth) zoning parcel. No Navy environmental sites are located within that FOST area and it will be the responsibility of the SSTDC to ensure that reuse of that area meets the approved zoning requirements assigned for the SR-W area.

The proposed reuse of the properties included in this FOST is consistent with the Reuse and Zoning Plans, references (a) and (b). Environmental conditions on these properties are suitable for the intended reuses.

2. The *Community Environmental Response Facilitation Act (CERFA) Determination Report, NAS South Weymouth, Massachusetts*, reference (c), was issued on 28 Mar 97 by the BRAC Cleanup Team (BCT) to identify "CERFA-uncontaminated" parcels, which are suitable for transfer by deed. The BCT identified the following CERFA-uncontaminated areas (i.e., CERFA Environmental Condition of Property [ECP] category 1) within the subject subparcels of this FOST: the runway/taxiways, Shea Memorial Drive, and Houghton Road. 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 (c), (d), and (f) and enclosure (3) document that no current Department of Defense (DoD) Installation Restoration (IR) Program sites are located within the subject subparcels of this FOST. No current or former CERCLA AOCs are located within the subject subparcels of this FOST. No current MCP sites are located within the FOST subparcels, although four former (i.e., closed) MCP sites were located therein. As described in enclosure (4), the Navy has completed final Response Action Outcomes (RAOs) for those four sites, thereby completing the required MCP actions and rendering those properties suitable for transfer. There are no identified impacts to the subject subparcels from the IR Program sites, CERCLA AOCs, or MCP sites located in other areas at NAS South Weymouth, although certain restrictions apply, as outlined in enclosure (2).

4. References (d) and (e) documented the results of the environmental site assessment completed at the former NAS South Weymouth, Massachusetts. The site assessment 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 EPA and the DoD of 4 May 94. References (d) and (e) documented the history of NAS South Weymouth and identified the current environmental conditions and the potential constraints for transfer of land and/or structures. References (d) and (e) incorporated 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, the Navy Engineering Field Activity Northeast (EFANE), and the Massachusetts Department of Environmental Protection (MADEP). References (d) and (e) also summarized 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), various EBS RIAs at NAS South Weymouth were located within the subject subparcels of this FOST. As presented in enclosure (1), No Further Action (NFA) is required for these RIAs and those properties are therefore suitable to transfer. As summarized in enclosure (5), to the best of the Navy's knowledge, the conditions at nearby EBS RIAs (i.e., not included in this FOST) have not adversely impacted the subject subparcels of this FOST. Investigations are ongoing at some of the nearby RIAs; however, the currently available information does not indicate that there are potential impacts from these RIAs outside of their mapped areas, as depicted in the figures of enclosure (1).

6. Enclosure (1) summarizes the information on existing environmental conditions at the subject subparcels. Additional information on surrounding properties is available in reference (d). In Table 1 of enclosure (1), each building is categorized with respect to its environmental history and use, indicating whether hazardous substances and petroleum products were stored for one year or more, or were known to have been released, treated, or disposed. The overall category for the seven subparcels in the FOST is Category 4, for areas where release, disposal, and/or migration has occurred, and all

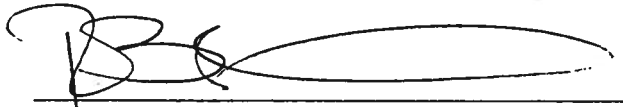
remedial actions have been taken. Subparcel TRE is Category 1, areas where no release or disposal has occurred. Subparcels INST-2, OS-C-3, SPUD-8, SPUD-9 are Category 2, areas where only release or disposal of petroleum products has occurred. Subparcel SPUD 10 is Category 3, areas where release, disposal, and/or migration has occurred, but require no remedial action. Subparcel OS-C-4 is Category 4, areas where release, disposal, and/or migration has occurred, and all remedial actions have been taken. The CERFA ECP categories are based on criteria for hazardous substance notice established in CERCLA Section 120 (h)(1), 40 CFR 373. Hazardous substances and petroleum products formerly used, released, or disposed of in the subject subparcels are listed in Table 2 of Enclosure 1. Notice of hazardous substances under CERCLA 120(h)(1) is provided in Table 3 of Enclosure (1) based on available information.

7. In accordance with the Federal Facility Agreement (FFA) for the NAS South Weymouth NPL site, this document, including enclosures (1) through (8), shall be made a part of the deed and any transfer documents or future leases entered into with any other party for the subject subparcels. References (a) through (f) 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 (f) shall be available upon request from the Navy's EFANE, 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 listed in Table 1 of this FOST are suitable to transfer under the terms and conditions of this FOST and that the environmental conditions are suitable for the proposed reuses. 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 at the former NAS South Weymouth. The EPA and MADEP have reviewed this FOST, references (c) through (f), and enclosures (1) through (8). Their comments on this FOST and its enclosures have been incorporated or otherwise addressed. Public Notice of the Navy's intent to sign this FOST was provided in the *Boston Globe* and the *Patriot Ledger* on

28 Jan 02. References (d) and (e) 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.

28 Jan 03
Date



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

ENCLOSURE (1)
ENVIRONMENTAL BASELINE SURVEY TO TRANSFER
FOR SEVEN ZONING SUBPARCELS DESIGNATED INST-2, OS-C-3, OS-C-4,
SPUD-8, SPUD-9, SPUD-10, AND THE TROTTER ROAD EXTENSION
(70.05 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 substances 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 (FOST)* of 9 Sep 93 ("*DoD Policy*"). Descriptions of the locations to be transferred are summarized in Table 1 of the 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: INST-2, OS-C-3, OS-C-4, SPUD-8, SPUD-9, SPUD-10, and the Trotter Road Extension (TRE) (70.05 total acres). As noted in the FOST Memorandum, "INST", "OS-C", and "SPUD" refer to properties zoned for "institutional", "open-space" (central zone), and "special planned use district" reuses.

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 some of the primary 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 presents the Navy's evaluation of 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 depict locations of the FOST subparcels as well as the buildings, UST/AST areas, and EBS RIAs within the subject subparcels:

- Figure 1 Base Location Map
- Figure 2 Subparcels included in this FOST
- Figure 3 Subparcels INST-2 and OS-C-3
- Figure 4 Subparcel OS-C-4
- Figure 5 Subparcel SPUD-8
- Figure 6 Subparcel SPUD-9
- Figure 7 Subparcel SPUD-10
- Figure 8 Trotter Road Extension.

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 of this EBST 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 Response Action Outcome (RAO) Statement for South Weymouth Naval Air Station, Shea Memorial Drive, Weymouth, MA, Release Tracking Number (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.

RAO Supporting Documentation Report, Barracks 115 Site by Brown & Root Environmental of Feb 98.

South Shore Tri-Town Development Corporation's (SSTTDC's) Governing Document as Approved by the Towns of Weymouth, Abington, and Rockland, Zoning and Land Use By-Laws for the Naval Air Station South Weymouth, approved 24 Mar 98.

Release Abatement Measure (RAM) Completion and RAO Supporting Documentation Report, Naval Exchange (NEX) Site (RTN 3-13316) by Brown & Root Environmental of 15 Jul 98.

South Weymouth NAS Reuse Plan and SSTTDC 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 & Webster Environmental Technology & Services of 13 Oct 98.

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

IRA Completion Report and Partial RAO, Jet Fuel Pipeline of 12 Oct 99.

Lead-Based Paint (LBP) Policy for Disposal and Residential Real Property, DoD Memorandum of 7 Jan 00.

Draft Phase II EBS Decision Document for RIA 55B, Area North of Trotter Road - Disposal Area by Stone & Webster Environmental Technology & Services of Jan 01.

Final U.S. Coast Guard (USCG) Integrated Support Detachment South Weymouth Buoy Depot Remedial Investigation (RI) Report, EA Engineering, Science, and Technology of Feb 01.

Email from Ms. Jane Connet, EA Engineering, Science, and Technology, to Ms. Patty Marajh-Whittemore, EPA, and Mr. David Chaffin, MADEP, re: Updated Draft Table of EBS

RIAs Requiring No Further Action (NFA) under the EBS of Aug 01.

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

RAO Supporting Documentation, Fuel Farm Site by Tetra Tech NUS of Feb 02.

EBS Review Items Requiring NFA under the EBS by EA Engineering, Science, and Technology, effective 18 Jan 02 and signed in Feb 02.

Final NFA Decision Document for EBS RIAs 42, 46, and 51 by EA Engineering, Science, and Technology of Apr 02.

Final Phase II RI, Sewage Treatment Plant by Tetra Tech NUS of Apr 02.

Revised Phase II EBS Decision Document for RIA 2C, Runway Lighting by Stone & Webster Environmental Technology & Services of 23 May 02.

Final Closeout Report for RIA 2B, Runway 17-35, Supplement 4 to Final Work Plan CTO 48, Limited Removal Action, CD Submittal No. CTO-48-31, by Foster Wheeler Environmental Corporation of 31 May 02.

Draft Final Phase II EBS Decision Document for RIA 78C, Undocumented UST Removal - UST No. 24 by Stone & Webster Environmental Technology & Services of 12 Jun 02.

Revised Phase II EBS Decision Document for RIA 47, Navy Exchange by EA Engineering, Science, and Technology of Aug 02.

Draft Final Phase II EBS Decision Document for RIA 1, Optical Landing System (OLS) Vaults by EA Engineering, Science, and Technology of Sep 02.

Final Engineering Evaluation and Cost Analysis for TACAN Outfall Sediment Removal and Storm Sewer System Cleaning, CD Submittal No. CTO-26-10, by Foster Wheeler Environmental Corporation of 23 Oct 02.

Response to EPA Comments on the Phase II EBS Draft Final Decision Document for Review Item Area 1, OLS Vaults by EA Engineering, Science, and Technology of 1 Nov 02.

Final Streamlined Ecological Risk Assessment for RIA 55B by Stone & Webster Environmental Technology & Services of 26 Nov 02.

Final Streamlined Human Health Risk Assessment (HHRA) for RIA 55B/D by EA Engineering, Science, and Technology of 13 Dec 02.

Response to MADEP Comments on the Revised Phase II EBS Decision Document for RIA 47 by EA Engineering, Science, and Technology of Dec 02.

Draft Final Feasibility Study, Sewage Treatment Plant by EA Engineering, Science, and Technology of Dec 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 initially designated during the *Phase I EBS* of 18 Nov 96, the *CERFA Determination Report* of 28 Mar 97, and the *BRAC Cleanup Plan* 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 also provides the Navy's revised ECP categories for the property contained within the subject subparcels. The ECP categories cited in this FOST and 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 investigations 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 conduct real estate surveys to accurately delineate the extent of the property to be transferred and to generate maps and legal descriptions that meet the requirements of the Counties' Registry of Deeds.

Subparcel INST-2

As shown in Figure 3, subparcel INST-2 is comprised of approximately 900 ft of Shea Memorial Drive (including sidewalk) in the northern portion of the Base. The subparcel is approximately 1.15 acres. This subparcel has been zoned for institutional reuse as per the *Zoning and Land Use By-Laws* of 24 Mar 98. The north, east, and south boundaries of the subparcel are defined by the boundaries of the institutional-zoned area at NAS South Weymouth. The west boundary is defined by the west edge of Shea Memorial Drive.

No current or former IR Program sites, CERCLA AOCs, or EBS RIAs are located within this subparcel. There are no current MCP

sites within this subparcel. As summarized in enclosure (4), the Navy has cleaned up one former MCP site, RTN 3-13673 (Shea Memorial Drive spill), in this subparcel and filed a final RAO, thereby closing the site and rendering this area suitable for transfer.

There are no other IR Program sites, CERCLA AOCs, MCP RTNs, or EBS RIAs nearby (within 200 ft of) subparcel INST-2.

Therefore, there are no outstanding environmental issues with the proposed transfer of this subparcel.

Subparcel OS-C-3

As shown in Figure 3, subparcel OS-C-3 is comprised of approximately 750 ft of Shea Memorial Drive (and sidewalk) in the northern portion of the Base. The subparcel is approximately 0.98 acres. This subparcel has been zoned for open space reuse as per the *Zoning and Land Use By-Laws* of 24 Mar 98. The north, east, and south boundaries of the subparcel are defined by the boundaries of the "OS-C" (open space-central) zoned area at NAS South Weymouth. The west boundary of subparcel OS-C-3 is defined by the west edge of Shea Memorial Drive.

No current or former IR Program sites, CERCLA AOCs, or EBS RIAs are located within this subparcel. There are no current MCP sites within this subparcel. As summarized in enclosure (4), the Navy has cleaned up one former MCP site, RTN 3-13673 (Shea Memorial Drive spill), in this subparcel and filed a final RAO, thereby closing the site and rendering this area suitable for transfer.

There are no ongoing environmental investigations nearby (within 200 ft of) this subparcel. The following former sites were located nearby this subparcel:

- MCP RTN 3-15379 (Building 24 Site) - As summarized in enclosure (4), the Navy has completed a response action and filed a final RAO to address a past petroleum release at this site. Therefore, former RTN 3-15379 does not affect the transfer of subparcel OS-C-3.
- EBS RIA 43 (Building 24 fill pipe) - As summarized in enclosure (5), no impacts to subparcel OS-C-3 are

identified because the pipe has been removed and NFA is required for this RIA.

- EBS RIA 44 (Building 98 soot) - As summarized in enclosure (5), no impacts to subparcel OS-C-3 are identified because the Navy has completed the required maintenance for this RIA and NFA is required.

Therefore, there are no outstanding environmental issues with the proposed transfer of this subparcel.

Subparcel OS-C-4

As shown in Figure 4, subparcel OS-C-4 is comprised of approximately 35.00 acres in the northwest portion of the Base. This subparcel has been zoned for open space reuse as per the *Zoning and Land Use By-Laws* of 24 Mar 98. Currently, the eastern portion of the subparcel consists of forested open space and roads/structures around the Base's former "Fuel Farm" (an area formerly containing large fuel tanks). The western portion of the subparcel currently contains forested open-space, open fields (runway median and "clear zone"), and the northern portion of one of the Base's runways. Building 90/3 (aviation gasoline separator) which was associated with the former Fuel Farm and the northwest corner of Building 103 (dining facility) are located in this subparcel. Building 103 is suitable to transfer as discussed in further detail in the summary of subparcel SPUD-9. Subparcel OS-C-4 does not include French Stream (the west boundary of Subparcel OS-C-4 is set back 20 ft from the east bank of French Stream). The southern boundary of subparcel OS-C-4 in the runway area is defined at the southern extent of the open space zoned area. As shown in Figure 4, subparcel OS-C-4 does not include the stormwater drainage ditch along the West Side of Houghton Road.

There are no current or former IR Program sites or CERCLA AOCs within subparcel OS-C-4. There are no current MCP sites within subparcel OS-C-4. The following former MCP sites and current/former EBS investigations are located within this subparcel:

- MCP RTN 3-16598 (Jet Fuel Pipeline Site) - As summarized in enclosure (4), the Navy has completed the required work along the pipeline located within the subparcel and has

filed a final RAO, thereby closing the pipeline portion of the site and rendering that property suitable for transfer.

- MCP RTN 3-10858 (Fuel Farm) - As summarized in enclosure (4), the Navy has completed the required work at this site and has filed a final RAO, thereby closing the site and rendering the property suitable for transfer. Although isolated pockets (point exceedances of MCP Method 1 S-1 standards) of petroleum-related compounds remain in site soil, there are no identified hazards for users of the property under the planned reuse (building and parking lot construction) because the Exposure Point Concentration for soil at the Fuel Farm does not exceed the MCP Method 1 S-1 standards. Also, one area where there recently was a detection of an isolated/point exceedance of the GW-2 standard subsequently received additional remediation.
- EBS RIA 2B (runway/taxiway north of 17-35) - As summarized in enclosure (5), the Navy has completed a limited removal action for soil in accordance with the MCP and has issued a closeout report. NFA is required; therefore, this property is suitable for transfer.
- EBS RIA 2C (suspected over-use of herbicides around runway lighting fixtures) - As summarized in enclosure (5), the detected herbicide concentrations were consistent with background levels and normal applications of herbicides. Therefore, this area is suitable to transfer. The Navy has issued a revised NFA Decision Document. The EPA and MADEP have concurred with the Navy.
- EBS RIA 25 (Fuel Farm) - As summarized in enclosure (5), this RIA has been addressed under the MCP program (see RTN 3-10858 above) and NFA is required.
- EBS RIA 97 (fire department spill response records) - As summarized in enclosure (5), this RIA does not adversely affect the transfer of subparcel OS-C-4 because RIA 97 was addressed under other RIA investigations and NFA is required.

The following current and former sites are located nearby (within 200 ft of) this subparcel:

- IR Program Site 1 (West Gate Landfill) - As summarized in enclosure (3), the nearby presence of IR Site 1 does not adversely affect the transfer of subparcel OS-C-4 because the concerns at Site 1 pertain to buried debris located west of French Stream that have not affected property east of the stream.
- IR Program Site 7 (Sewage Treatment Plant) - As summarized in enclosure (3), the nearby location of Site 7 does not adversely affect the transfer or use of subparcel OS-C-4 because the Site 7 risks are primarily associated with surface soil and sediment at that site itself. The primary chemicals of concern (COCs) at Site 7 are pesticides, which are generally immobile and are not anticipated to migrate to other areas. The completed Phase II RI of Apr 02 did not indicate the presence of Site 7 COCs in the FOST property. Human health risks are associated with future residential and future recreational use of the site itself. No residential use is planned or allowed under the current zoning at Site 7 or in the FOST subparcel. Warning signs are currently in place at Site 7 to discourage access to the site until the future remedial action has been completed. However, calculations presented in the final Phase II RI indicated that there are no unacceptable risks for trespassers onto Site 7. The Phase II RI also indicated that there is a slight human health risk in a hypothetical situation where a future resident at Site 7 consumed groundwater from beneath Site 7 (due to the detection of a low concentration of arsenic in one groundwater sample from the site). However, the approved zoning for the Site 7 area, as well as subparcel OS-C-4, disallows future residential use of these areas. Also, the detected concentration of arsenic did not exceed federal drinking water standards and subparcel OS-C-4 is located several hundred feet downgradient (southwest) of the Site 7 well in which arsenic was detected; therefore, the conditions identified at that well are unlikely to affect subparcel OS-C-4.
- IR Program Site 8 (Abandoned Bladder Tank Fuel Storage Area) - As summarized in enclosure (3), the nearby presence of IR Site 8 does not adversely affect the transfer of subparcel OS-C-4 because no unacceptable risks to human health or the environment have been identified and no remedial actions are required at Site 8.

- IR Program Site 10 (Hangar 2, Building 82) - As summarized in enclosure (3), the Navy is conducting an RI at Site 10 to address volatile organic compounds (VOCs) in groundwater above benchmark criteria. This site now incorporates EBS RIA 30A, which was associated with potential spills on the hangar apron. Groundwater in this area flows south/southwest. As such, subparcel OS-C-4 is northwest of and upgradient of Site 10, and is unlikely to be affected by this site.
- AOC 30B (spills off the edge of the Hangar 2 apron) - As summarized in enclosure (6), no adverse impacts to subparcel OS-C-4 have been identified to date. Although investigations are ongoing at AOC 30B, no impacts to subparcel OS-C-4 are anticipated because COCs at AOC 30B are primarily limited to the sediment within a drainage ditch located outside of the FOST subparcel. Also, AOC 30B is not hydrogeologically upgradient of the subparcel (i.e., groundwater at AOC 30B flows south, away from subparcel OS-C-4). The Navy has included the affected ditch in the removal action/cleanup planned for the Base's stormwater drainage system (designated AOC 61 - TACAN Outfall). AOC 30B was formerly designated as EBS RIA 30B.
- AOC 55B (debris areas north of Trotter Road) - This AOC was formerly designated EBS RIA 55B. As summarized in enclosure (6), no impacts to subparcel OS-C-4 have been identified because AOC 55B is located west of French Stream, outside of the FOST subparcel. Subparcel OS-C-4 is set back 20 ft on the East Side of French Stream. Unacceptable human health risks have not been identified at AOC 55B. Low ecological risks were only identified in the far northwestern portion of AOC 55B. That portion has been designated as AOC 55D and does not adversely affect subparcel OS-C-4 because it is located more than 1,000 ft away.
- MCP RTN 3-13673 (Shea Memorial Drive spill) - As summarized in enclosure (4), no impacts to subparcel OS-C-4 have been identified because the Navy has cleaned up this spill and filed a final RAO, thereby closing the site.
- EBS RIA 24 (Building 50 oil/water separator) - As summarized in enclosure (5), no impacts to subparcel OS-C-4

have been identified because the Navy has completed a removal action and further sampling. The investigation indicates that NFA is required for this RIA.

- EBS RIA 26 (jet fuel separator house) - As summarized in enclosure (5), this RIA has been addressed as part of the Fuel Farm MCP RTN 3-10858 (see above) and NFA is required.
- EBS RIA 31 (fire protection pump house) - No impacts to subparcel OS-C-4 have been identified because, as summarized in enclosure (5), no releases to the environment were identified and NFA is required for this RIA.
- EBS RIA 32 (non-potable water supply stored in an UST) - As summarized in enclosure (5), no impacts to subparcel OS-C-4 have been identified because NFA is required for RIA 32.
- EBS RIA 42 (subsurface asbestos-lined pipes) - As summarized in enclosure (5), no impacts to subparcel OS-C-4 have been identified because the pipes are underground outside of the FOST subparcel and NFA is required for this RIA.
- EBS RIA 62 (French Stream) - As summarized in enclosure (5), no impacts to subparcel OS-C-4 are identified because impacts associated with RIA 62, if any, are limited to the immediate area of the stream. Subparcel OS-C-4 is set back 20 ft from the banks of French Stream.
- EBS RIA 77 (UST leak tests) - As summarized in enclosure (5), no impacts to subparcel OS-C-4 have been identified because USTs have been removed or tested and NFA is required.

Therefore, with the restrictions specified in clause (8) of enclosure (2), there are no outstanding environmental issues for the proposed transfer of subparcel OS-C-4.

Subparcel SPUD-8

As shown in Figure 5, subparcel SPUD-8 includes approximately 8.28 acres in the northern portion of the Base. This subparcel has been zoned as a "special planned use district" (SPUD) (see description in the FOST Memorandum) as per the *Zoning and Land Use By-Laws* of 24 Mar 98. Currently, the subparcel mostly

consists of open space (enclosed by chain-link fence) that was the location of the former Fuel Farm for NAS South Weymouth. The subparcel also contains Building 102 (former NEX) which is located adjacent to the former Fuel Farm and is outside of that fenced area. The western boundary of subparcel SPUD-8 is defined by the zoning boundary. The eastern boundary of the subparcel is defined by the Building 102 area and the east edge of Houghton Road (excluding the storm water drainage ditch along the West Side of Houghton Road).

There are no current or former IR Program sites or CERCLA AOCs within subparcel SPUD-8. There are no current MCP sites within the subparcel. The following former MCP sites and current/former EBS investigations are located within this subparcel:

- MCP RTN 3-10858 (Fuel Farm) - As summarized in enclosure (4), the Navy has completed the required work at this site and has filed a final RAO, thereby closing the site and rendering the property suitable for transfer. Although isolated pockets (point exceedances of MCP Method 1 S-1 standards) of petroleum-related compounds remain in site soil, there are no identified hazards for users of the property under the planned reuse (building and parking lot construction) because the Exposure Point Concentration for soil at the Fuel Farm does not exceed the MCP Method 1 S-1 standards. Also, one area where there recently was a detection of an isolated/point exceedance of the GW-2 standard subsequently received additional remediation.
- MCP RTN 3-13316 (Navy Exchange [NEX] Site) - This former site is partially located within the subparcel (south of Building 102). As summarized in enclosure (4), the Navy has completed cleanup work and filed a final RAO, thereby closing the site and rendering the property suitable for transfer.
- EBS RIA 25 (Fuel Farm oil/water separator) - The oil/water separator was part of the former Fuel Farm. As summarized in enclosure (5), this RIA has been addressed as part of MCP RTN 3-10858 (see above) and NFA is required.
- EBS RIA 26 (jet fuel separator house floor drains) - This separator house was part of the former Fuel Farm. As

summarized in enclosure (5), this RIA has been addressed as part of MCP RTN 3-10858 (see above) and NFA is required.

- EBS RIA 47 (Building 102 hydraulic lifts) - The hydraulic lifts were located inside the former garage area of Building 102. As summarized in enclosure (5), the Navy has completed a removal action and further investigations at this site, and NFA is required.
- EBS RIA 48 (NEX filling station UST leak detection failure) - This former RIA is partially located within subparcel SPUD-8. As summarized in enclosure (5), NFA is required because this RIA was addressed and closed out as part of the MCP RTN 3-13316 (see above).
- EBS RIA 77 (UST leak tests not performed) - In subparcel SPUD-8, RIA 77 pertained to UST Nos. 18 and 19 (see Table 2). As summarized in enclosure (5), the Navy has completed tracer tests and tank removals and NFA is required, thereby rendering this area suitable for transfer.
- EBS RIA 78C (undocumented removal of UST No. 24 at Building 102) - As summarized in enclosure (5), the Navy has collected samples to confirm that NFA is required and that this area is suitable to transfer.
- EBS RIA 79 (basewide asbestos) - As summarized in enclosure (5) and later in this EBST, this RIA is being handled on a case-by-case basis in accordance with DoD policy as part of the property transfer process. NFA is required under the EBS program.
- EBS RIA 91 (NEX filling station incidental drips/spills) - This RIA is partially located within SPUD-8. As summarized in enclosure (5), NFA is required for RIA 91 because it was addressed and closed out as part of MCP RTN 3-13316 (see above).

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

- IR Program Site 7 (Sewage Treatment Plant) - As summarized in enclosure (3), the nearby presence of Site 7 does not adversely affect the transfer of subparcel SPUD-8 because the identified risks at Site 7 pertain to COCs at the site

itself. Potential human health risks at Site 7 are associated with hypothetical future residential and recreational reuse scenarios. The nearby SPUD-8 subparcel is not planned or zoned for residential or recreational reuse. "No trespassing" signs are posted around Site 7, although the HHRA for Site 7 found no unacceptable risks for trespassers. COCs (pesticides) at Site 7 are generally immobile and subparcel SPUD-8 is hydrogeologically cross-gradient of Site 7. Therefore, subparcel SPUD-8 is not anticipated to be impacted by COCs in soil or groundwater from Site 7. The completed Phase II RI for Site 7 indicated that COCs have not impacted adjacent FOST subparcels.

- MCP RTN 3-16598 (Jet Fuel Pipeline Site) - This former site does not adversely affect the transfer of the subparcel because, as summarized in enclosure (4), the Navy has completed cleanup work along the pipeline and finalized an RAO to close this portion of the site.
- EBS RIA 24 (Building 50 oil/water separator) - No impacts to subparcel OS-C-4 have been identified because, as summarized in enclosure (5), the Navy has completed a removal action and further investigations. The investigation indicates that NFA is required for this RIA.

Therefore, with the restrictions specified in clause (8) of enclosure (2), there are no outstanding environmental issues for the proposed transfer of subparcel SPUD-8.

Subparcel SPUD-9

As shown in Figure 6, subparcel SPUD-9 includes approximately 9.27 acres in the north/central portion of the Base. This subparcel has been zoned as a SPUD area (see description in the FOST Memorandum) as per the *Zoning and Land Use By-Laws* of 24 Mar 98. The subparcel consists of various buildings and their associated roads and grounds (see Table 1).

There are no current or former IR Program sites or CERCLA AOCs within subparcel SPUD-9. The following former MCP sites and current/former EBS investigations are located within this subparcel:

- MCP RTN 3-13673 (Shea Memorial Drive spill) - As summarized in enclosure (4), the Navy has cleaned up the RTN 3-13673 spill and filed a final RAO, thereby closing the site and rendering this property suitable to transfer.
- MCP RTN 3-15829 (Building 115 Site) - As summarized in enclosure (4), the Navy has completed the required cleanup work at this site and has filed a final RAO, thereby closing the site and rendering this property suitable to transfer.
- EBS RIA 46 (suspected buried asbestos shingles) - As summarized in enclosure (4), no hazards were identified and NFA is required. Therefore, this area is suitable to transfer.
- EBS RIA 77 (UST leak tests not performed) - In subparcel SPUD-9, this pertained to the UST at Building 103 (see Table 2). As summarized in enclosure (5), the tank has been removed and NFA is required; therefore, this area is suitable for transfer.
- EBS RIA 79 (basewide asbestos) - As summarized in enclosure (5) and later in this EBST, this RIA is being handled on a case-by-case basis in accordance with DoD policy as part of the property transfer process. NFA is required under the EBS program.
- EBS RIA 90 (pipes protruding from ground by Building 20) - As summarized in enclosure (4), this RIA does not adversely affect the transfer of subparcel SPUD-9 because the pipes were determined to be part of the sewer system infrastructure. NFA is required.

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

- IR Program Site 9 (Building 81 Site) - As summarized in enclosure (3), subparcel SPUD-9 is deemed to be suitable to transfer provided that no groundwater use or extraction is permitted in the subparcel due to the current conditions at Site 9. See clause 8(a) of enclosure (2).

- IR Program Site 10 (Hangar 2, Building 82) - As summarized in enclosure (3), the Navy will be conducting an RI at Site 10 to investigate VOCs in groundwater that have been detected at concentrations above benchmark criteria. Site 10 now incorporates EBS RIA 30A, which was associated with potential spills on the hangar apron. Groundwater in this area flows south/southwest. As such, subparcel SPUD-9 is east of and hydrogeologically side-gradient of Site 10, and is unlikely to be affected by this site. However, as stated in clause 8(a) of enclosure (2), no groundwater extraction shall be permitted in the nearby subparcels until the Navy has completed further investigations at this site.
- MCP RTNs 3-10628 and 3-11622 (Building 81 Site) - As summarized in enclosure (4), this site is being addressed as part of IR Program Site 9 (see above).
- MCP RTN 3-14646 (Tanks 9A and 9B) - No impacts to the subparcel have been identified because, as summarized in enclosure (4), the Navy has completed the required cleanup work at this site and has filed a final RAO, thereby closing the site.
- MCP RTN 3-15289 (Building 105 Swimming Pool) - No impacts to the subparcel have been identified because, as summarized in enclosure (4), the Navy has completed the required cleanup work at this site and has filed a final RAO, thereby closing the site.
- MCP RTN 3-18110 (Building 82 Site) - As summarized in enclosures (3) and (4), the Navy will be addressing this site under IR Program Site 10 (see above).
- EBS RIA 19 (Tanks 9A and 9B) - As summarized in enclosure (5), this RIA has been addressed under MCP RTN 3-14646 (see above) and NFA is required.
- EBS RIA 20 (Building 15 hydraulic oil spill) - No impacts to the subparcel have been identified because, as summarized in enclosure (5), the Navy properly managed this spill and NFA is required.

- EBS RIA 21 (Building 15 hydraulic lifts) - As summarized in enclosure (5), this RIA (approximately 160 ft away) does not adversely affect the transfer of subparcel SPUD-9 because the hydraulic lifts have been removed and potential impacts, if any, are likely to be limited to the area beneath Building 15 itself.
- EBS RIA 27 (Building 81 stained concrete) - As summarized in enclosure (5), this RIA is being addressed under IR Program Site 9 (see above).
- EBS RIA 28 (Building 81 floor drain) - As summarized in enclosure (5), this RIA is being addressed under IR Program Site 9 (see above).
- EBS RIA 29 (wash rack) - No impacts to the subparcel have been identified because, as summarized in enclosure (5), the Navy completed the required maintenance and NFA is required.
- AOC 30B (spills off the edge of the Hangar 2 apron) - As summarized in enclosure (6), no adverse impacts to subparcel SPUD-9 have been identified to date. Although investigations are ongoing at AOC 30B, no impacts to the subparcel are anticipated because COCs at AOC 30B are primarily limited to the sediment within a drainage ditch located outside of the FOST subparcel. Also, AOC 30B is hydrogeologically side-gradient of the subparcel (i.e., groundwater at AOC 30B flows south away from subparcel SPUD-9). The Navy has included the affected ditch in the removal action/cleanup planned for the Base's stormwater drainage system (designated AOC 61 - TACAN Outfall). AOC 30B was formerly designated as EBS RIA 30B.
- EBS RIA 42 (subsurface asbestos-lined pipes) - As summarized in enclosure (5), no impacts to the subparcel have been identified because the pipes are located underground outside of the subparcel and NFA is required.
- EBS RIA 49 (swimming pool) - No impacts to the subparcel have been identified because, as summarized in enclosure (5), the Navy has properly managed the discharge and NFA is required.

- EBS RIA 50 (child care center) - No impacts to the subparcel have been identified because, as summarized in enclosure (5), no elevated lead concentrations were detected in soil samples and NFA is required.
- EBS RIA 78A (undocumented UST removal) - No impacts to the subparcel have been identified because, as summarized in enclosure (5), no elevated analyte concentrations were detected and NFA is required.
- EBS RIA 95C (Building 16 PCB storage/use) - No impacts to the subparcel have been identified because, as summarized in enclosure (5), the concern was located in the basement of Building 16, the Navy has completed a removal action, and confirmatory sampling indicates that NFA is likely to be required.
- EBS RIA 107 (spills on Hangar 2 apron) - As summarized in enclosure (5), no adverse impacts are identified for the subparcel because potential impacts at RIA 107, if any, are likely limited to the paved apron and drain system around Hangar 2 (outside of subparcel SPUD-9). This RIA is being further investigated as part of IR Program Site 10 (see above).

Therefore, with the restrictions specified in clause (8) of enclosure (2), there are no outstanding environmental issues for the proposed transfer of subparcel SPUD-9.

Subparcel SPUD-10

As shown in Figure 7, subparcel SPUD-10 includes approximately 14.18 acres in the northwest portion of the Base. This subparcel has been zoned as a SPUD area (see description in the FOST Memorandum) as per the *Zoning and Land Use By-Laws* of 24 Mar 98. The subparcel contains a portion of runway 17-35 and its associated taxiway, roads, and open grounds. There are no buildings or structures within this subparcel. The northern boundary of subparcel SPUD-10 is defined by the zoning delineation. The subparcel does not include French Stream (the west boundary of subparcel SPUD-10 is set back 20 ft from the east bank of French Stream). The eastern boundary of subparcel SPUD-10 is at the east edge of the taxiway pavement.

There are no current or former IR Program sites or CERCLA AOCs within subparcel SPUD-10. The following former MCP sites and current/former EBS investigations are located within this subparcel:

- MCP RTN 3-16598 (Jet Fuel Pipeline Site) - As summarized in enclosure (4), the Navy has completed the required work along the pipeline located within the subparcel and has filed a final RAO, thereby closing the pipeline portion of the site and rendering that property suitable for transfer.
- EBS RIA 1 (Runway/Taxiway OLS Vaults) - As summarized in enclosure (5), the Navy has completed investigations at RIA 1 and obtained regulatory concurrence on NFA. Therefore, this area is suitable to transfer.
- EBS RIA 2C (suspected over-use of herbicides around runway lighting fixtures) - As summarized in enclosure (5), the detected herbicide concentrations were consistent with background levels and normal applications of herbicides. NFA is required. Therefore, this area is suitable to transfer.

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

- IR Program Site 1 (West Gate Landfill) - As summarized in enclosure (3), the nearby presence of Site 1 does not adversely affect the transfer of subparcel SPUD-10 because the concerns at Site 1 pertain to buried debris located west of French Stream that have not impacted the property east of the stream.
- IR Program Site 8 (Abandoned Bladder Tank Fuel Storage Area) - As summarized in enclosure (3), the nearby presence of Site 8 does not adversely affect the transfer of subparcel SPUD-10 because no unacceptable risks to human health or the environment have been identified at Site 8 and No Action is required.
- IR Program Site 10 (Hangar 2) - Although Site 10 is located beyond 200 ft from subparcel SPUD-10, there are concerns about potential impacts to groundwater at this nearby, upgradient site. As summarized in enclosure (3), the Navy's investigations at Site 10 are ongoing; therefore, some precautionary restrictions are warranted for subparcel

SPUD-10. See clause 8(a) of enclosure (2) regarding restrictions for subparcel SPUD-10 with respect to the conditions at Site 10.

- AOC 30B (spills off the edge of the Hangar 2 apron) - As summarized in enclosure (6), no adverse impacts to subparcel SPUD-10 have been identified to date. Although investigations are ongoing at AOC 30B, no impacts to the subparcel are anticipated because COCs at AOC 30B are primarily limited to the sediment within a drainage ditch located outside of the FOST subparcel. Also, AOC 30B does not appear to be hydrogeologically upgradient of the subparcel (i.e., groundwater at AOC 30B flows south, which is cross-gradient from subparcel SPUD-10). The Navy has included the affected ditch in the removal action/cleanup planned for the Base's stormwater drainage system (designated AOC 61 - TACAN Outfall). AOC 30B was formerly designated as EBS RIA 30B.
- MCP RTN 3-19064 (Aviation Gasoline USTs) - This site does not adversely affect the transfer of the subparcel because, as summarized in enclosure (4), the Navy has completed the required cleanup work at this site and has filed a final RAO, thereby closing the site.
- EBS RIA 34 (Marine hot refueler area) - As summarized in enclosure (5), no impacts to subparcel SPUD-10 have been identified because RIA 34 is not upgradient. Also, the available sampling data are within background levels and NFA for this RIA is likely. The Navy is evaluating additional sampling data to confirm that NFA is required.
- EBS RIA 38 (former location of Buildings 34, 35, 36, and 37) - As summarized in enclosure (5), this RIA has been addressed as part of MCP RTN 3-19064 (see above).
- EBS RIA 62 (French Stream) - As summarized in enclosure (5), no impacts to subparcel SPUD-10 are identified because impacts associated with RIA 62, if any, are limited to the immediate area of the stream. Subparcel SPUD-10 is set back 20 ft from the stream bank.

Therefore, with the restrictions specified in clause (8) of enclosure (2), there are no outstanding environmental issues for the proposed transfer of subparcel SPUD-10.

Subparcel TRE

As shown in Figure 8, subparcel TRE includes approximately 1.19 acres of roadway located west and outside of the Main Base fenceline. This subparcel was not included in the zoning identified in the *Reuse Plan*, but is nonetheless in a suitable condition for the Navy to transfer. The subparcel is comprised of approximately 680 ft of Trotter Road that is located between Route 18 and the railroad line. There are no buildings within this subparcel.

There are no current or former IR Program sites, CERCLA AOCs, MCP sites, or EBS RIAs within this subparcel.

The only NAS South Weymouth investigation sites nearby (within 200 ft of) this subparcel are the Navy's MCP RTN 3-15342 (Building 78 ground electric) and the USCG Integrated Support Detachment Buoy Depot site (EBS RIAs 57, 58, 59, and 103). As summarized in enclosure (4), the Navy has completed the required cleanup work and filed a final RAO to close RTN 3-15342. As summarized in enclosure (5), the USCG is conducting a CERCLA investigation at the Buoy Depot (former Navy property that was transferred to the USCG on 29 Sep 00) that also addresses EBS RIAs 57, 58, 59, and 103. The USCG completed a final RI in Feb 01 for the Buoy Depot and no potential impacts to the subparcel TRE area were identified (impacts at the Buoy Depot site pertain to soil at that site and a swale/wetland south of that site).

Therefore, there are no outstanding environmental issues with the proposed transfer of this subparcel.

Massachusetts Contingency Plan Sites

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

- RTN 3-10858 (Fuel Farm) in subparcels SPUD-8 and OS-C-4
- RTN 3-13673 (Shea Memorial Drive spill) in subparcels INST-2, OS-C-3, and SPUD-9
- RTN 3-15829 (Building 115 Barracks) in subparcel SPUD-9

- RTN 3-16598 (Jet Fuel Pipeline Site) in subparcels OS-C-4 and SPUD-10.

As summarized in enclosure (4), the Navy has completed the required cleanup work and filed final RAOs for each of these sites. Therefore, the locations of these RTNs are suitable to transfer. No Activity and Use Limitations (AULs) were filed with these RAOs. As previously described in this EBST and as summarized in enclosure (4), no other active MCP sites are located in the vicinity of the FOST subparcels. Other former MCP sites in the vicinity of the FOST subparcels have not adversely impacted those properties.

EBS Review Item Areas

Pursuant to the *Basewide EBS Phase I Report* of 18 Nov 96 and subsequent Navy investigations, various EBS RIAs have been identified at NAS South Weymouth. The following RIAs were located within, or partially within, the subject subparcels of this EBST:

- EBS RIA 1 (runway/taxiway OLS vaults) in subparcel SPUD-10
- EBS RIA 2B (runway/taxiway north of 17-35) in subparcel OS-C-4
- EBS RIA 2C (herbicides around runway lighting) in subparcels OS-C-4 and SPUD-10
- EBS RIA 25 (Fuel Farm oil/water separator) in subparcels SPUD-8 and OS-C-4
- EBS RIA 26 (jet fuel separator house floor drains) in subparcel SPUD-8
- EBS RIA 46 (suspected buried asbestos shingles) in subparcel SPUD-9
- EBS RIA 47 (Building 102 [NEX] hydraulic lifts) in subparcel SPUD-8
- EBS RIA 77 (UST leak tests not performed) which included tanks located in subparcels SPUD-8 and SPUD-9

- EBS RIA 78C (undocumented UST removal) in subparcel SPUD-8
- EBS RIA 90 (pipes protruding from ground) in subparcel SPUD-9
- EBS RIA 97 (fire department spill response records) in subparcel OS-C-4.

As summarized in enclosure (5), the Navy has completed the required work and closure documentation for these RIAs. The Navy also has obtained regulatory concurrence for NFA on these RIAs. Therefore, the property within these RIAs is suitable to transfer.

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 preclude a FOST. Notification of solid waste debris areas within the FOST subparcels is provided in enclosure (8). The Navy is working to resolve solid waste issues with MADEP separately from this FOST.
- EBS RIA 79 (Basewide asbestos) - As summarized in enclosure (5), this RIA is being handled on a case-by-case basis in accordance with DoD policy as part of the property transfer process. NFA is required under the EBS program. The types and quantities of asbestos-containing materials (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. Restrictions to mitigate the identified potential ACM-related hazards within the FOST subparcels are presented under clause (8) of enclosure (2). As noted above, NFA is required for two ACM-related RIAs within the FOST subparcels.
- 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.

No PCB contamination has been identified within the subject subparcels of this EBST.

Asbestos

The *PIH Survey* of Aug 01 reported the current types, quantities, and conditions of ACMs in the buildings currently present 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 17 (SPUD-9) - Presumed ACMs are associated with the carpet mastic throughout the building in most areas (7,396 square feet [SF]); the 12-inch x 12-inch blue floor tile and mastic in the vestibules and miscellaneous small rooms throughout the building (612 SF); and the old floor tile mastic throughout the building adhering to the concrete slab (7,405 SF).

- Building 20 (SPUD-9) - Identified ACMs are associated with the 12-inch x 12-inch tan floor tile and mastic in the kitchen and bathroom of units A and B (300 SF).
- Building 51 (SPUD-8) - Identified ACMs are associated with the roof tar (1,300 SF).
- Building 75 (SPUD-9) - Identified ACMs are associated with the 9-inch x 9-inch black and green floor tile and mastic in the library hall, first floor bedrooms, first floor game-room, center stairwell, second floor bedrooms, second floor hallway, and the open bay (11,605 SF); the 2-ft x 2-ft black floor tile and mastic in the open bay perimeter (134 SF); and the gray leveling compound which is likely present throughout the building (unknown quantity). Presumed ACMs are associated with the joint compound throughout the building (1,511 SF); the carpet mastic throughout the building in most areas (8,178 SF); and the built-up roofing material (7,130 SF).
- Building 90/3 (OS-C-4) - No ACM inventory available.
- Building 99 (SPUD-8) - Identified ACMs are associated with the window caulking of the northeast window. Presumed ACMs are associated with the built-up roofing material (220 SF).
- Building 102 (SPUD-8) - Identified ACMs are associated with the 2-inch to 4-inch cal/mag pipe insulation and fittings in the garden shop (30 linear feet [LF], 7 each); the 12-inch x 12-inch beige floor tile and mastic in the main shopping area, exchange offices, and credit union (8,044 SF); the 12-inch x 12-inch gray speck floor tile and mastic in the NEX offices (1,247 SF); the 12-inch x 12-inch charcoal speck floor tile and mastic in the mini-mart (338 SF); the 12-inch by 12-inch multi-color speck and mastic in the second floor lounge (80 SF); the 12-inch x 12-inch beige floor tile with charcoal streaks and mastic in the eastern administration office, barber shop and small rooms north of the barber shop, and the credit union (952 SF); the roof felt (8,190 SF); and the roof tar (8,190 SF). Presumed ACMs are associated with the 12-inch x 12-inch cream floor tile with tan specks and mastic in the uniform shop and storage room off of the main shopping area (900 SF); the 12-inch x 12-inch coffee floor tile and mastic in the second floor lounge (50 SF); the 2-ft x 2-ft

ceiling tile in the credit union (132 SF); the 4-inch vinyl baseboard and mastic in the NEX offices, NEX bathrooms, and storage room off of the main shopping area (130 LF); the 4-inch brown vinyl baseboard and mastic in the NEX storage (24 LF); the 4-inch black vinyl baseboard and mastic in the main shopping area, garden shop storage, uniform shop, eastern administration offices, credit union, and barber shop (416 LF); the carpet mastic in the NEX manager's office (320 SF); and the 5 fire safes in the exchange offices.

- Building 103 (SPUD-9) - Identified ACMs are associated with the 127 fittings on the 2- to 4-inch fiberglass lines in the mechanical room and crawlspace; the 27 fittings on the 6-inch fiberglass lines in the back hallway and crawlspace; the 12-inch x 12-inch rust floor tile and mastic in the dining area (2,810 SF); the plaster walls in the freezer areas (2,352 SF); and the roof tar (9,800 SF). Presumed ACMs are associated with the 9-inch x 9-inch blue floor tiles and mastic in the officer's dining room (522 SF); the plaster ceiling in the food preparation rooms (1,329 SF); the gypsum board in the officer's dining room (800 SF); the joint compound in the officer's dining room (80 SF); the mastic on foam in the cold room ceiling (323 SF); the transite panels in the exterior fascia (840 SF); and the carpet mastic in the officer's dining room and the kitchen office (836 SF).
- Building 106 (SPUD-9) - No ACMs identified.
- Building 115 (SPUD-9) - Identified ACMs are associated with the 12-inch x 12-inch brown floor tiles and mastic in the entrance to the rooms, the first floor lounge, and the second floor kitchen (3,336 SF). Presumed ACMs are associated with the carpet mastic throughout the building (11,136 SF).

DoD Policy on Asbestos at BRAC Properties of 12 Jan 95 states that ACMs 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 SSTDC). A copy of the DoD policy on asbestos is presented in the *BRAC Cleanup Plan* of Aug 98.

The Navy's EBS investigations have identified one asbestos-related RIA within the FOST subparcels (RIA 46 - suspected buried asbestos shingles adjacent to Building 75 in subparcel SPUD-9). As previously described in this EBST and in enclosure (5), no such buried debris was found during subsequent investigations; therefore, NFA is required for RIA 46.

The *PIH Survey* of Aug 01 reported that approximately 2,035 cubic feet of soil in the crawlspace of Building 103 contains asbestos debris. As described in clause 8(c) of enclosure (2), the Grantee shall restrict access to the crawlspace so long as this condition remains.

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. Due to the presence of such underground utilities, any subsurface work performed by the Grantee must be conducted in accordance with an approved health and safety plan and conducted by trained, properly equipped personnel. See clause 8(b) of enclosure (2).

Lead-Based Paint in Residential Buildings

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.

As evidenced by the approved zoning (e.g., open space, SPUD) and land use (e.g., subparcel INST-2 shall remain a roadway), 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(d) of enclosure (2).

Of the buildings in the FOST, only Building 20 (Transient Housing), Building 75 (Barracks), and Building 115 (Bachelors Enlisted Quarters [BEQ]) are potentially suitable for overnight stays. Building 75 is currently being subleased for such purposes. Based on SSTTDC's letter of 14 Mar 01 to the Navy, it is the Navy's understanding that the SSTTDC has completed a lead assessment for Building 75 and has completed any necessary abatements in accordance with federal, state, and local requirements prior to occupancy. As stated in clause 8(d) of enclosure (2), similar assessments and potential abatements would be required for any buildings intended for temporary housing.

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. The current federal action level for lead in drinking water is 15 micrograms per liter ($\mu\text{g/L}$). The 1992 sample results for the water fountains in the buildings contained within this FOST (Building 75 = 14 $\mu\text{g/L}$, Building 103 = 1 $\mu\text{g/L}$, and Building 15 = below method detection limit) did not exceed the current action level of 15 $\mu\text{g/L}$.

Aboveground Storage Tanks and Underground Storage Tanks

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

- The Fuel Tank Farm in subparcel SPUD-8 was comprised of several storage tanks as follows:
 - UST No. 17 (structure 79/1) had a capacity of 219,321 gal and was used for the storage of jet fuel. It was a steel

tank installed in 1951, taken out of service in 1992, and removed in Spring 94.

- UST No. 18 (structure 79/3) had a capacity of 219,321 gal and was used for the storage of JP-8 (jet fuel). It was a steel tank installed in 1951 and removed in the early/mid 1990s.
- UST No. 19 (structure 79/2) had a capacity of 219,521 gal and was used for the storage of JP-8 (jet fuel). It was a steel tank installed in 1951 and removed in the early/mid 1990s.
- UST No. 22 (structure 90/1) had a capacity of 219,321 gal and was used for the storage of aviation gasoline. It was a steel tank installed in 1953 and removed in Spring 94.
- UST No. 23 (structure 90/2) had a capacity of 109,660 gal and was used for the storage of aviation gasoline. It was a steel tank installed in 1953 and removed in Spring 94.
- UST No. 41A (structure 79/5) had a capacity of 550 gal and was used for the storage of waste JP-5 (jet fuel). It was a steel tank installed in 1951 and removed circa 1986-1987.
- UST No 41 B (structure 90/4) had a capacity of 550 gal and was used for the storage of JP-5 (jet fuel). It was a steel tank installed in 1951 and removed circa 1986-1987.
- Building 102 (NEX) in subparcel SPUD-8 had one 550-gal UST (No. 24) for waste oil. The undocumented removal of UST No. 24 in 1994 was addressed under EBS RIA 78C (see enclosure [5]). The *BRAC Cleanup Plan* of Aug 98 documents that three other USTs were associated with Building 102; however, these tanks were located outside of the subparcels of this FOST (the tanks were part of the gasoline filling station associated with the NEX and were addressed as part of MCP RTN 3-13316).
- Building 103 (Dining Facility) in subparcel SPUD-9 formerly had one 550-gal UST that was removed in 1989.
- Building 103 (Dining Facility) in subparcel SPUD-9 had one fiberglass, 2,000-gal heating oil UST (No. 29) that was

installed in 1989 and removed in Aug 01. A leak test was performed for this UST under EBS RIA 77 (see enclosure [5]).

- Building 115 (BEQ) in subparcel SPUD-9 had one steel, 4,000-gal heating oil UST (No. 32) that was installed in 1977 and removed circa 1997 under MCP RTN 3-15829.
- SPUD-10 contained one of the Base's aircraft arresting mechanisms (braking systems) along the edge of the runway. The mechanism contained an approximate 300-gal reservoir containing antifreeze (used as a braking fluid). The mechanism and antifreeze reservoir have been removed and no releases of antifreeze were identified. A schematic of the mechanism is available for review on NAVFAC Drawing No. 2009981 of 6 Nov 73.

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 U.S. Environmental Protection Agency's (EPA's) advisory action level of 4 picocuries per liter (pCi/L).

Pesticides

Detailed information regarding the specific past use of pesticides within the FOST subparcels is not available. 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, the only pesticide/herbicide-related investigation site is EBS

RIA 2C (suspected overuse of herbicides around runway lighting). As summarized in enclosure (5), NFA is required for RIA 2C.

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 the Comprehensive Environmental Response, Compensation, and Liability Act (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.

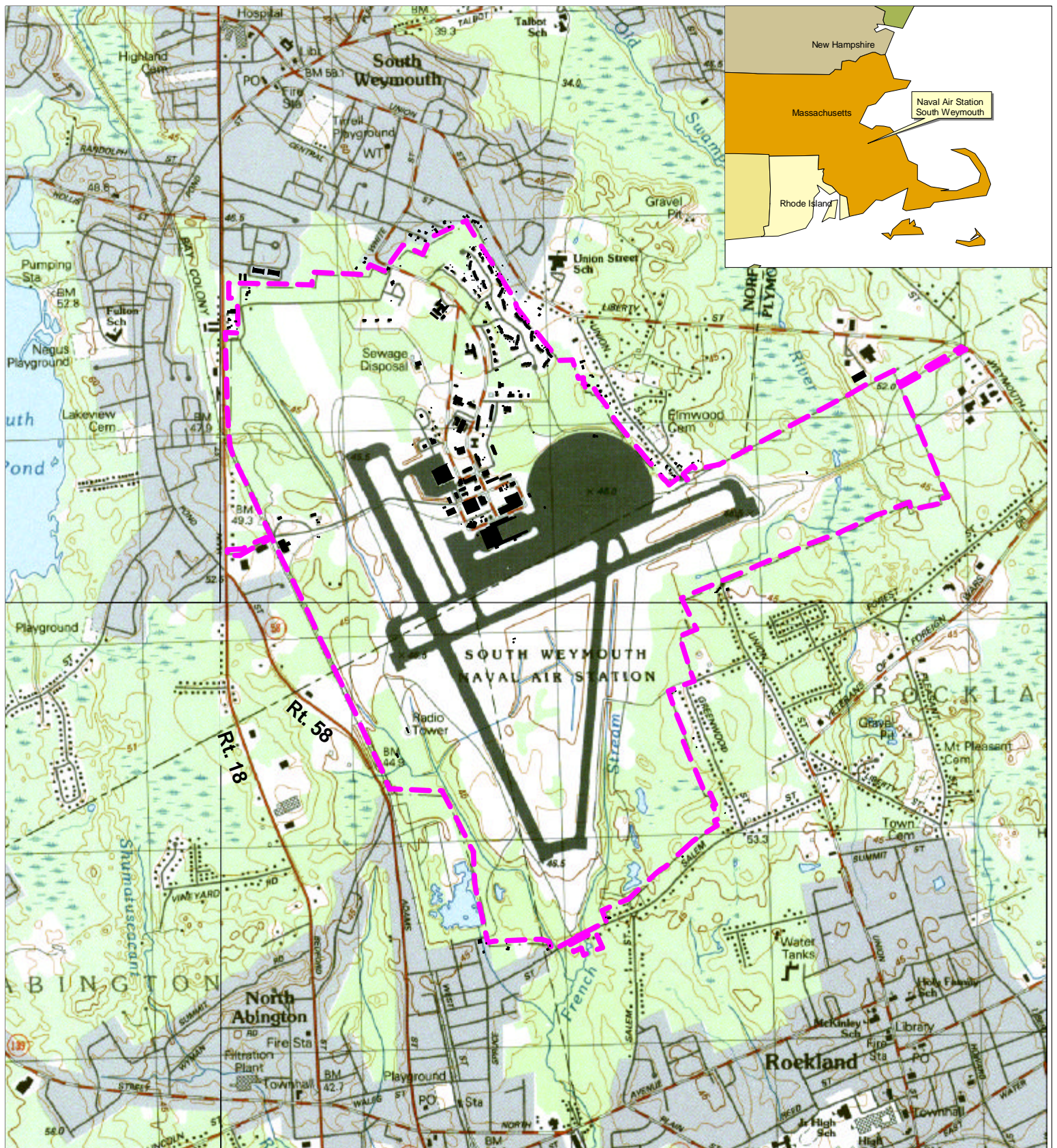
Therefore, the presence of solid waste in the subject subparcels does not preclude the FOST provided that notification and any necessary restrictions are included in the FOST document. Enclosure (8) of this FOST summarizes the types, quantities, and locations of solid waste within the FOST subparcels.

Separately from the FOST, the Navy is coordinating with State solid waste 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.

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

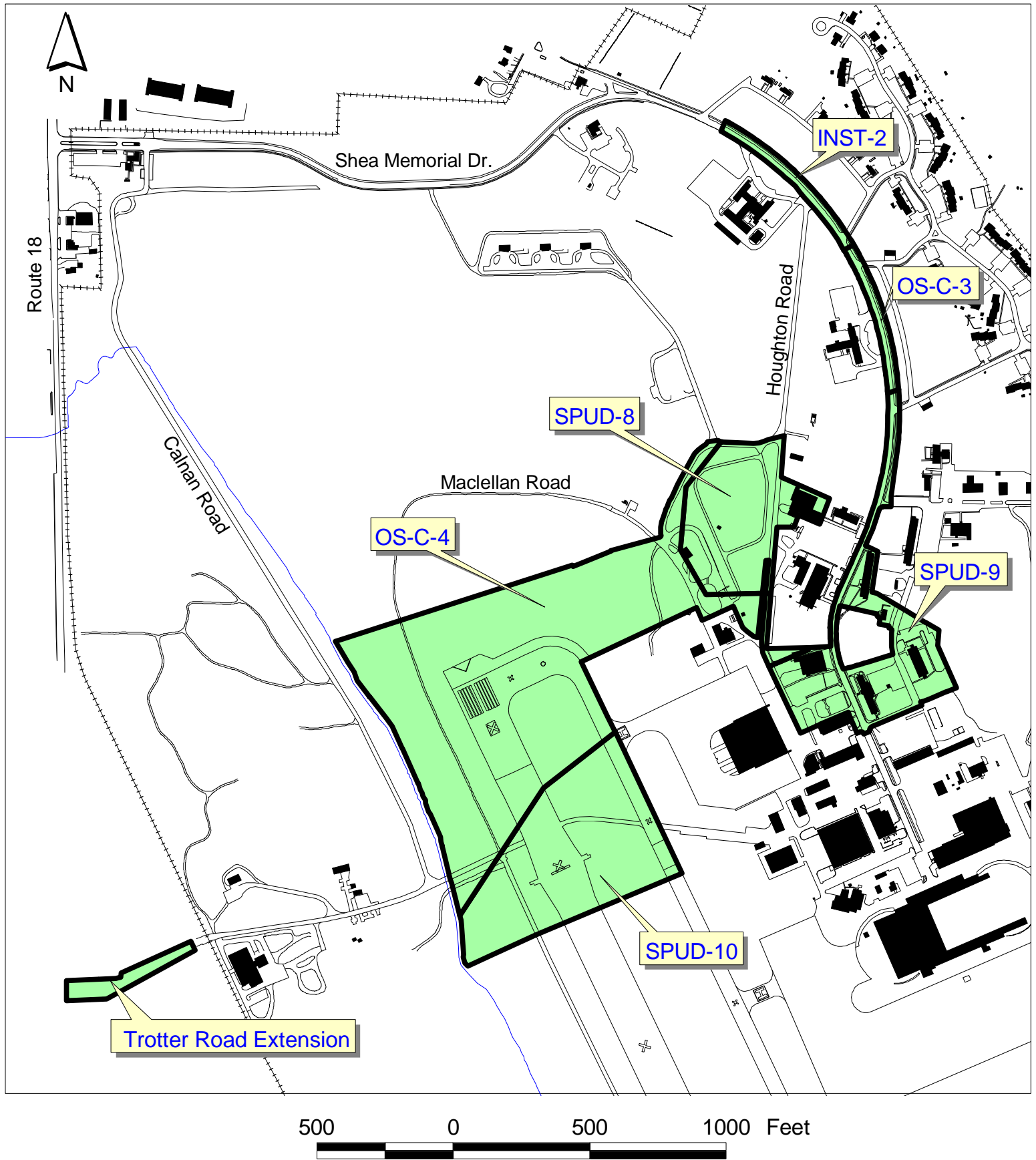
kilograms or the substance's reportable quantity, whichever is greater. There are no records or knowledge that hazardous substances, listed under 40 CFR 261.30 as acutely hazardous waste, were stored for one year or more, in excess of 1 kilogram. Notice is also required when hazardous substances are 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

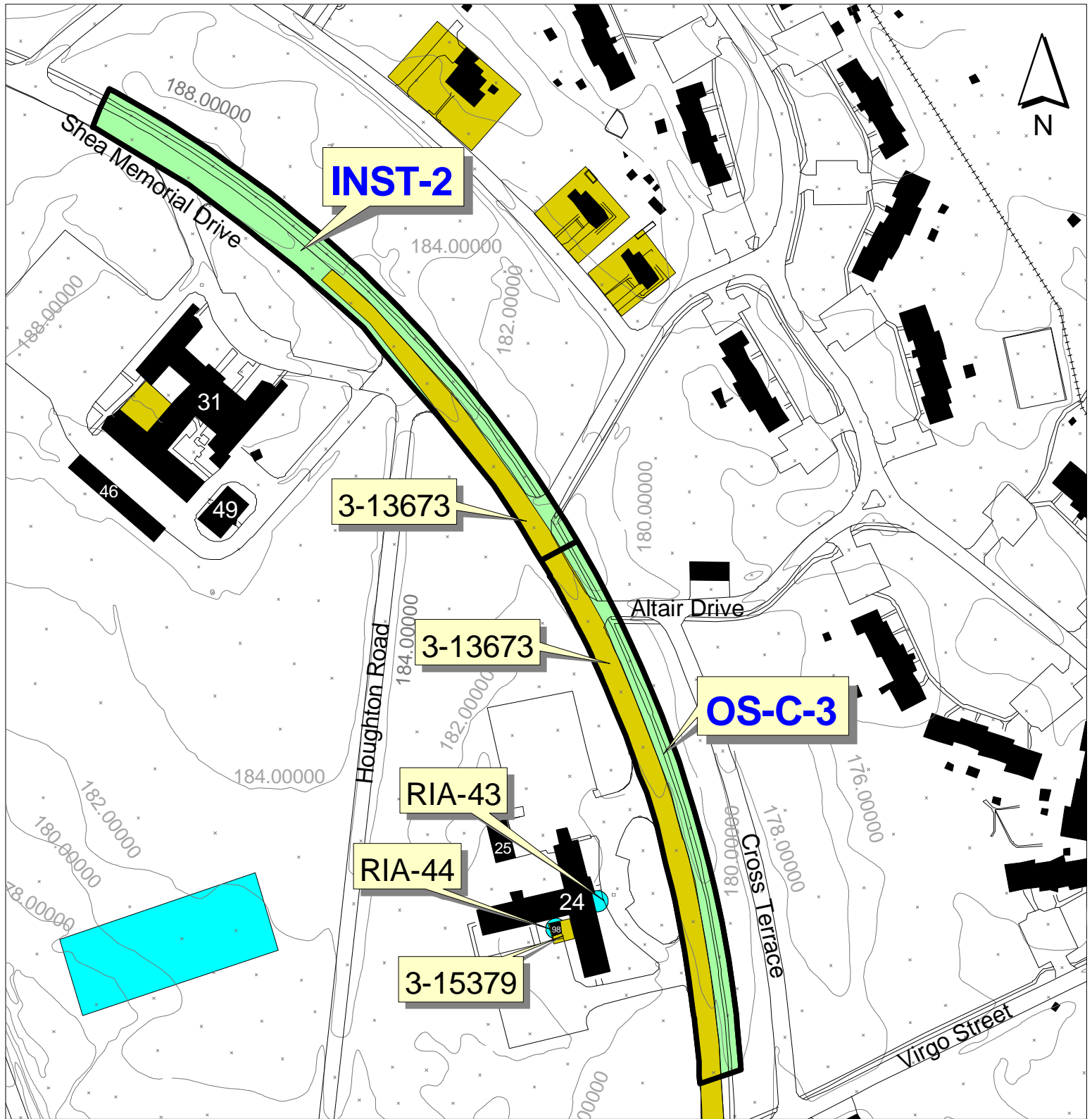
 NAS South Weymouth Perimeter

Figure 1
Main Base Location Map



- Property Fenceline
- Roads & Pavement
- Buildings & Facilities
- FOST Subparcel

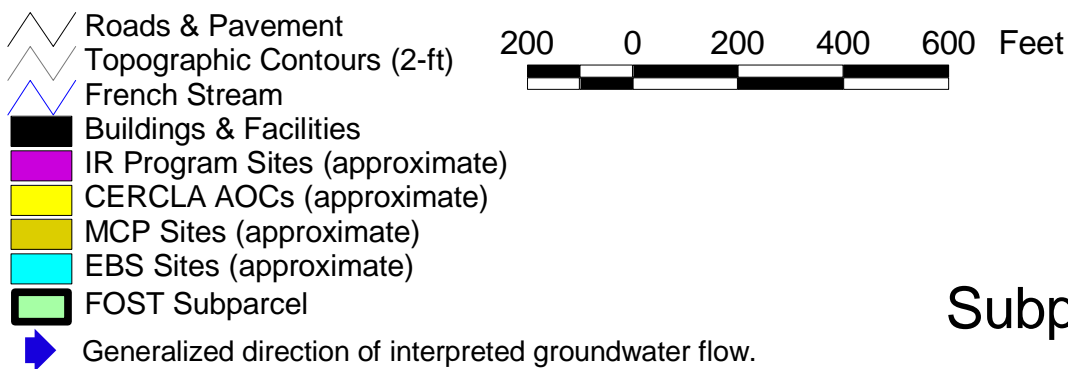
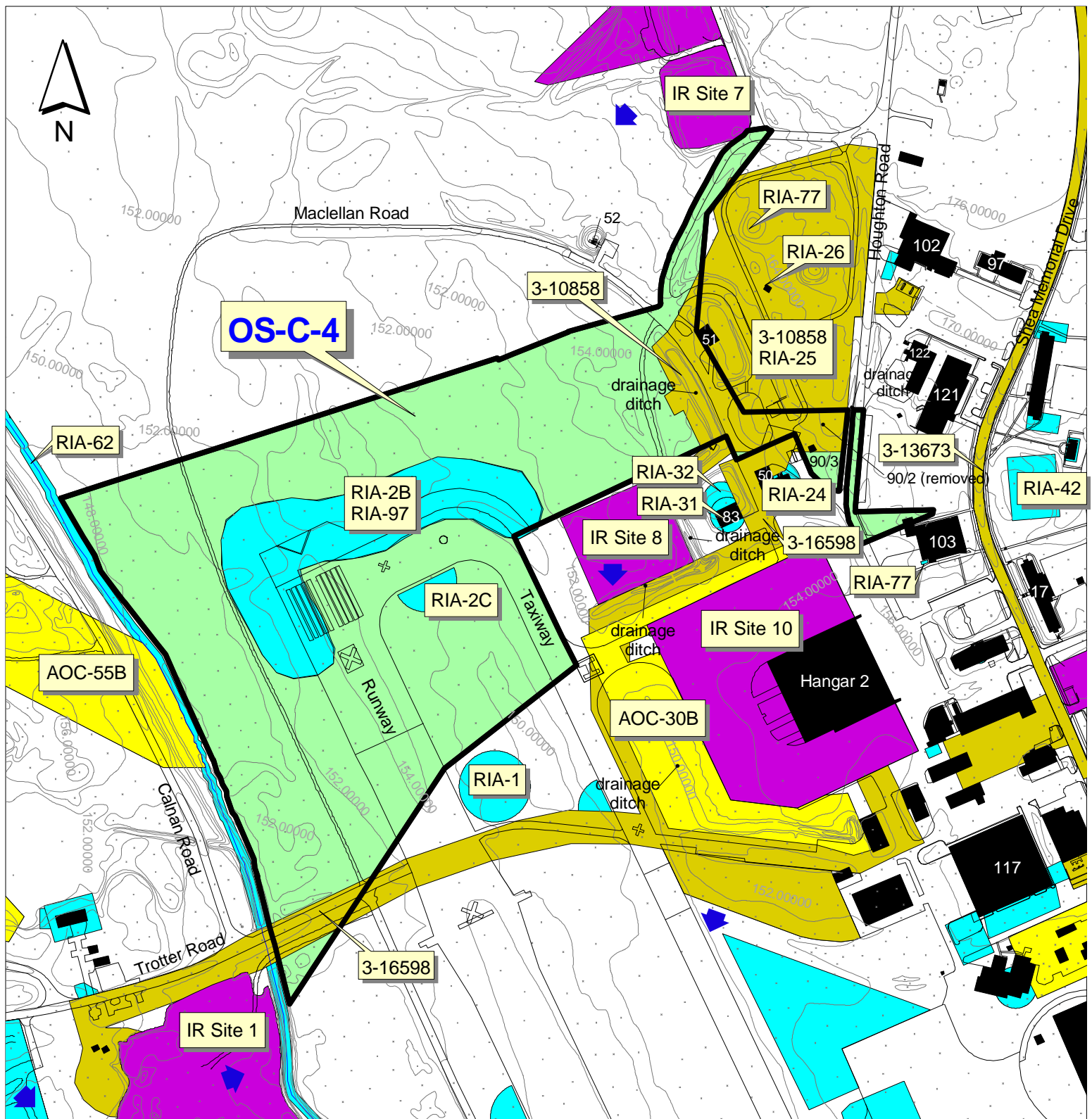
Figure 2
Subparcels included
in this FOST



-  Property Fenceline
-  Roads & Pavement
-  Topographic Contours (2-ft)
-  Buildings & Facilities
-  MCP Sites (approximate)
-  EBS Sites (approximate)
-  FOST Subparcels

Figure 3
Subparcels INST-2
and OS-C-3

Note: Only environmental sites within 200 ft of the FOST Subparcels are labelled.



Note: Only environmental sites within 200 ft of the subparcel are labelled.

Figure 4
Subparcel OS-C-4

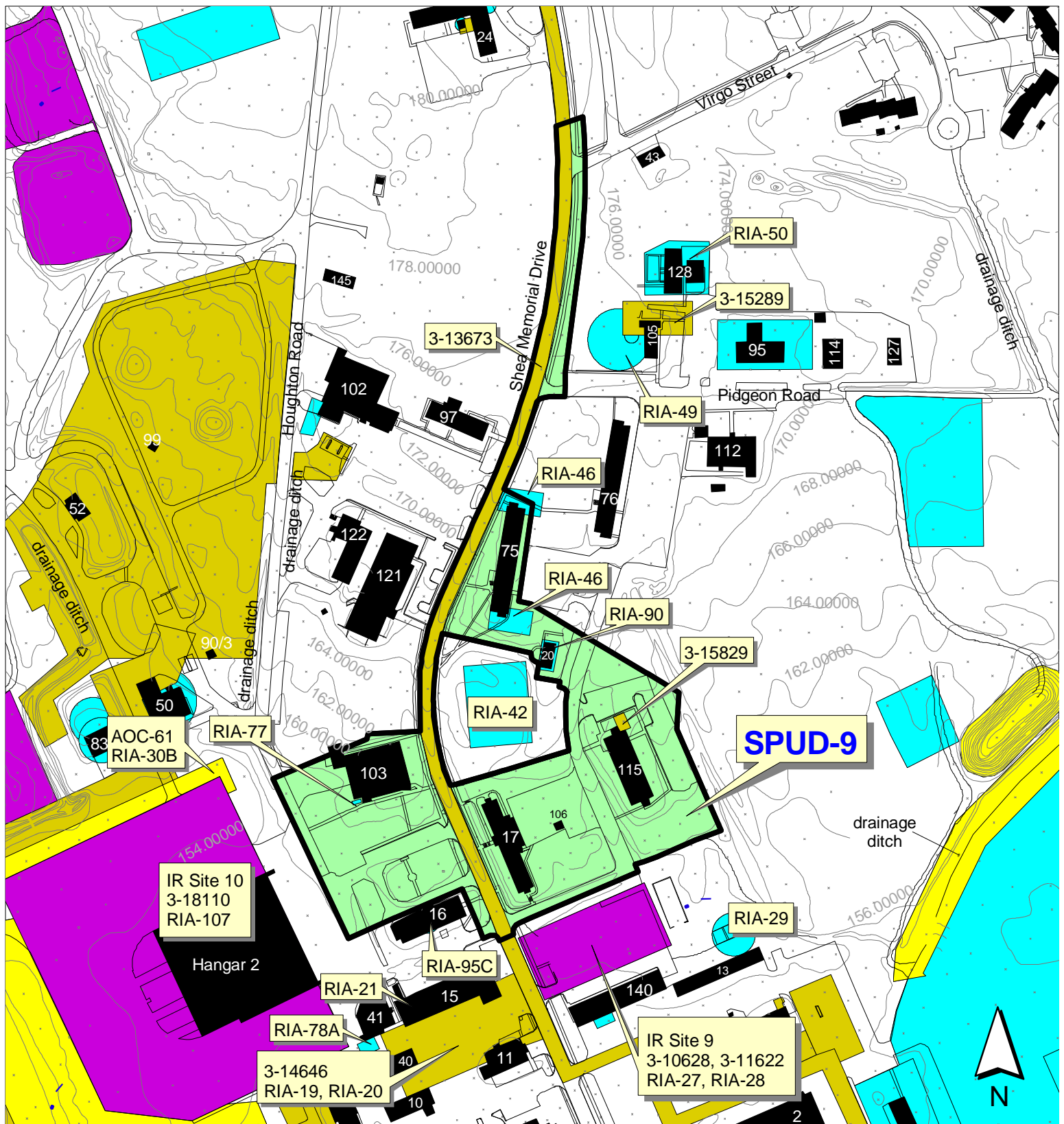


Generalized direction of interpreted groundwater flow.

Note: Only environmental sites within 200 ft of the subparcel are labelled.

Note: Basewide RIA 79 (asbestos) is not shown on the map.

Figure 5
Subparcel SPUD-8



- Roads & Pavement
- Topographic Contours (2-ft)
- Buildings & Facilities
- IR Program Sites (approximate)
- CERCLA AOCs (approximate)
- MCP Sites (approximate)
- EBS Sites (approximate)
- FOST Subparcel

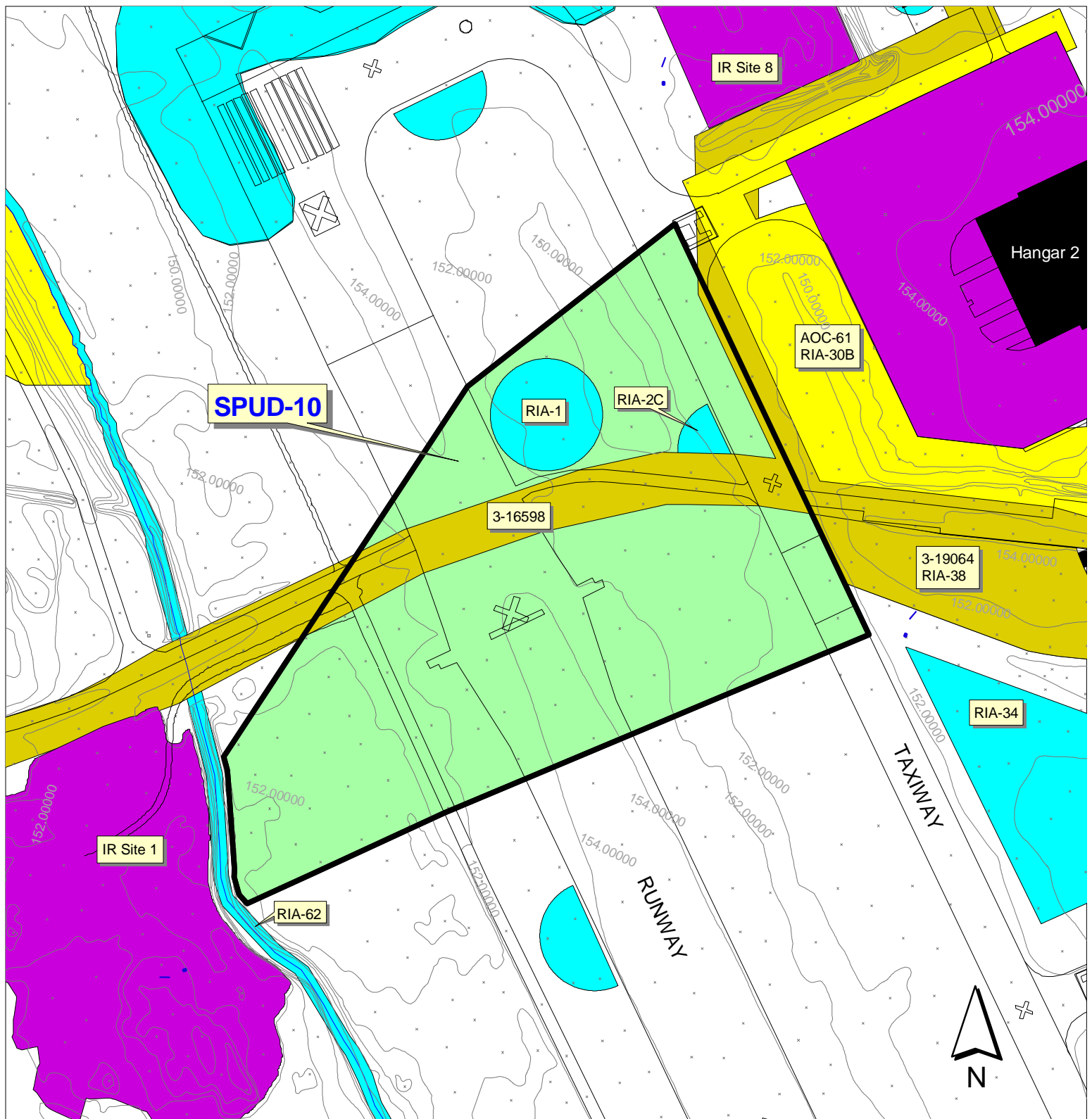
200 0 200 400 Feet

Generalized direction of interpreted groundwater flow.

Note: Only environmental sites within 200 ft of the subparcel are labelled.

Note: Basewide RIA 79 (asbestos) is not shown on the map.

Figure 6
Subparcel SPUD-9



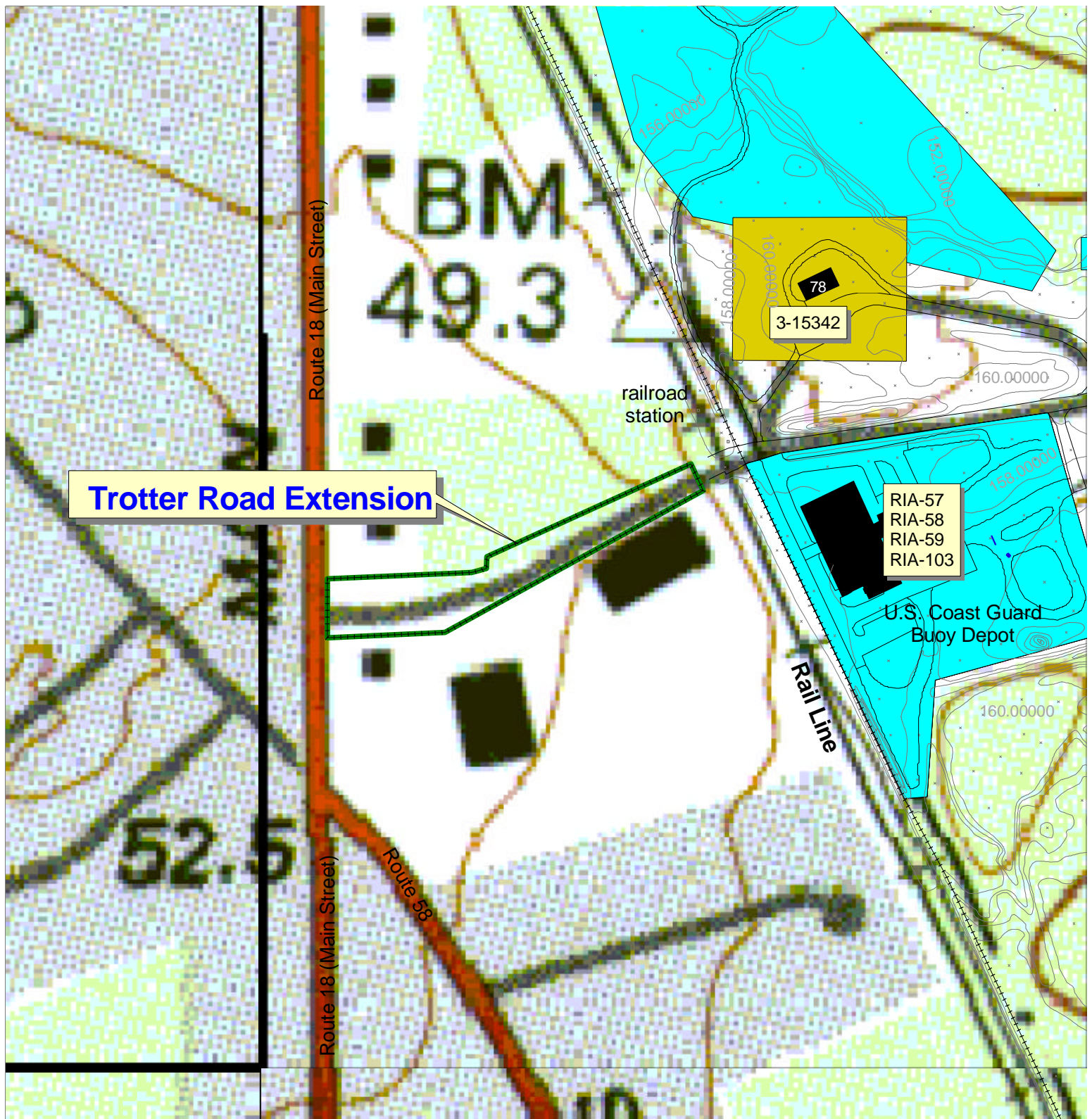
- Roads & Pavement
- Topographic Contours (2-ft)
- French Stream
- Buildings & Facilities
- IR Program Sites (approximate)
- CERCLA AOCs (approximate)
- MCP Sites (approximate)
- EBS Sites (approximate)
- FOST Subparcel

200 0 200 400 Feet

Generalized direction of interpreted groundwater flow.

Note: Only environmental sites within 200 ft of the subparcel are labelled.

Figure 7
Subparcel SPUD-10



- Property Fenceline
- Roads & Pavement
- Topographic Contours (2-ft)
- Buildings & Facilities
- MCP Sites (approximate)
- EBS Sites (approximate)
- FOST Subparcel

200 0 200 400 Feet



Generalized direction of interpreted groundwater flow.

Note: Only environmental sites within 200 ft of the subparcel are labelled.
 Note: Underlying map from USCG Topographic Quadrangle Map.

Figure 8
Trotter Road Extension

TABLE 1 SUMMARY OF CONDITIONS

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
INST-2	None	Yes	This subparcel consists of a portion of Shea Memorial Drive and its sidewalk to the east.	2	<ul style="list-style-type: none"> As documented in the <i>Community Environmental Response Facilitation Act (CERFA) Report</i> of 28 Mar 97, Shea Memorial Drive was designated as "CERFA 1 clean." Massachusetts Contingency Plan (MCP) Release Tracking Number (RTN) 3-13673 (Shea Memorial Drive spill) - As summarized in enclosure (4), the Navy has cleaned and closed this RTN through a Class A-1 Response Action Outcome (RAO).
OS-C-3	None	Yes	This subparcel consists of a portion of Shea Memorial Drive and its sidewalk to the east.	2	<ul style="list-style-type: none"> As documented in the <i>CERFA report</i> of 28 Mar 97, Shea Memorial Drive was designated as "CERFA 1 clean." MCP RTN 3-13673 (Shea Memorial Drive spill) - As summarized in enclosure (4), the Navy has cleaned and closed this RTN through a Class A-1 RAO.
OS-C-4	90/2, 90/3, and a portion of 103	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 90/3 (Aviation Gasoline [AvGas] Separator House) is a concrete structure that was part of the former Fuel Tank Farm. Structure 90/2 was a large underground storage tank (UST) used to store AvGas. Structure 90/2 has been removed. A portion of Building 103 is located in OS-C-4 (see description under subparcel SPUD-9).	2	<ul style="list-style-type: none"> Overall past operations at the Fuel Farm had resulted in releases of petroleum products into soil and a drainage ditch. As summarized in enclosure (4), these past releases were addressed under MCP RTN 3-10858 (Fuel Farm). The Navy completed cleanup actions and filed a final RAO to close this site in Feb 02.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
OS-C-4	None in remainder	Yes, given restrictions outlined in clause 8 of enclosure (2)	The remainder of subparcel OS-C-4 contains the northern end of the north-south Runway 17-35 (including taxiway). The subparcel also contains a portion of the clear zone around the runway/taxiway and the median therein.	4	<ul style="list-style-type: none"> As documented in the <i>CERFA report</i> of 28 Mar 97, the runway and taxiway within this subparcel were designated as "CERFA 1 clean." Suspected overuse of herbicides around runway lighting areas was designated Environmental Baseline Survey (EBS) Review Item Area (RIA) 2C. One of these areas was located at the north end of Runway 17-35. As summarized in enclosure (5), No Further Action (NFA) is required for RIA 2C. Potential past releases of petroleum products at the north end of Runway 17-35 was designated EBS RIA 2B. As summarized in enclosure (5), the Navy has completed a limited removal action for soil and has issued a closeout report. NFA is required. EBS RIA 97 (past fire department responses) includes the area at the north end of Runway 17-35; however, as summarized in enclosure (5), NFA is required for EBS RIA 97 because it was addressed under other RIAs (i.e., RIA 2B for the north end of Runway 17-35).

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
SPUD-8	51	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 51 (Rocket Magazine) is a 1,352 SF, single-story structure built in the 1940s and located near the former Fuel Farm. Base maps from 1945 describe Building 51 as a pyrotechnic magazine. Subsequent map revisions (1970 and later) describe Building 51 as a rocket magazine. As a rocket magazine, Building 51 was used for the storage of inert ordnance, such as rocket warheads, bombs, fuses, motors, and marine location markers. It is unheated and has no floor drains. Ordnance has been removed and Building 51 is currently used for equipment storage by the Navy's Remedial Action Contractor (RAC).	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. The <i>Potential Immediate Hazard (PIH) Survey</i> of Aug 01 reported that asbestos-containing materials (ACMs) remain in fair condition. The <i>PIH Survey</i> of Aug 01 reported that a significant amount of the exterior paint is peeling. The interior is not painted. A wipe sample from the floor inside the building (south end) was reported to contain 660.2 micrograms per square foot (µg/SF) of lead. Since Building 51 will not be reused for residential purposes, no remediation of lead dust is required by the Navy. See clause 8(f) of enclosure (2).

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
SPUD-8	Former (demo-lished Buildings 79, 79/4, 79/5, and 90/4	Yes, given restric-tions outlined in clause 8 of enclosure (2)	Buildings 79 (Truck Loading Stand), 79/4 (Fuel Separator House), 79/5 (Fuel Pump House), and 90/4 (AvGas Pump House) were part of the former Fuel Tank Farm. Facilities 79/1, 79/2, and 79/3 were large jet fuel USTs. Facility 90/1 was a large AvGas UST. Building 79 was used to transfer fuel from the Fuel Farm into tank trucks. Building 79/4 was used as a jet fuel filter house. Building 79 was demolished in Apr 98 as part of the MCP cleanup work at the Fuel Farm. Buildings 79/4 and 79/5 were demolished in Oct 97 as part of the MCP cleanup work at the Fuel Farm.	2	<ul style="list-style-type: none"> Overall past operations at the Fuel Farm had resulted in releases of petroleum products into soil and a drainage ditch (e.g., see footnote in Table 2 of the EBST). As summarized in enclosure (4), these past releases were addressed under MCP RTN 3-10858 (Fuel Farm). The Navy completed cleanup actions and has filed a final RAO to close this site in Feb 02. The surface water drainage ditch from this area lead to an oil/water separator that is located outside of the FOST subparcels and discharges water to French Stream. The operation of the catch basin and oil/water separator in this area was designated as EBS RIA 25 because of concerns about the compliance of such an arrangement. The destination of the floor drain in Building 79/5 was designated EBS RIA 26. As summarized in enclosure (5), EBS RIAs 25 and 26 were addressed as part of the work under MCP RTN 3-10858 and NFA is required.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
SPUD-8	99	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 99 (Transformer House) was part of the former Fuel Farm. Building 99 is a 220 SF, one-story structure that was used to house circuit breakers and is now used for equipment storage. Building 99 has no floor drains.	2	<ul style="list-style-type: none"> • Overall past operations at the Fuel Farm had resulted in releases of petroleum products into soil and a drainage ditch. As summarized in enclosure (4), these past releases were addressed under MCP RTN 3-10858 (Fuel Farm). However, 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 at Building 99. • The <i>PIH Survey</i> of Aug 01 reported that ACMs remain in fair condition. • The <i>PIH Survey</i> of Aug 01 reported that the building's interior is not painted and that the exterior paint remains in good condition.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
SPUD-8	102	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 102 (Navy Exchange - NEX) is a one-story masonry structure with metal roofing that was originally built in 1963 at 1,250 SF. It received a 4,000-SF addition in 1970, a 7,080-SF addition in 1976, and finally a 2,000-SF addition in 1982 for its present size of 14,330 SF. It was formerly heated by station steam (currently unheated). The NEX sold items regularly found in department stores to military personnel and also included a barbershop and an ATM. The southwest section was associated with a gasoline filling station for military personnel vehicles. General vehicle maintenance occurred in the storeroom next to the gas station office. The former location of the filling station pump islands and USTs are not located within this FOST parcel. The NEX has been unoccupied since Base closure in 1997.	2	<ul style="list-style-type: none"> • The disposition of hydraulic lifts in the storeroom next to the gas station office was designated EBS RIA 47. As summarized in enclosure (5), the Navy has issued a Decision Document and obtained regulatory concurrence on NFA for RIA 47. • The undocumented removal of UST No. 24 at the southwest corner of Building 102 was designated RIA 78C. As summarized in enclosure (5), the Navy has issued a Decision Document and NFA is required for RIA 78C. • The <i>PIH Survey</i> of Aug 01 reported that ACMs remain in fair condition. • The <i>PIH Survey</i> of Aug 01 reported that the interior paint remains in good condition and only a small amount of the exterior paint is peeling. A dust wipe sample from the floor was reported to contain <20 µg/SF of lead (i.e., non-detect).

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
SPUD-9	17	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 17 (Naval Reserve Center) is a 7,492 SF, single-story, wood-frame building that was built in the 1940s. It was originally a galley and later housed the Personnel Support Detachment (PSD). It was gutted and rebuilt in Dec 94 (when the PSD was moved to Building 2). The building has a carpeted concrete floor and no floor drains. The building consists of office space and was heated by station steam. Building 17 is currently leased to the South Shore Tri-Town Development Corporation (SSTDC) and subleased to the Massapoag School for use as an educational center.	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. The <i>PIH Survey</i> of Aug 01 reported that the presumed ACMs remain in good condition. The <i>PIH Survey</i> of Aug 01 reported that a small amount of peeling paint is present on the building's rear vestibule and a small amount of exterior paint is peeling. A dust wipe sample from the floor in the building was reported to contain <20 µg/SF of lead (i.e., non-detect).
SPUD-9	20	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 20 (Transient Housing) is a 1,200 SF; wood-frame duplex built in the early 1940s. It is heated by electric baseboard heating. Building 20 is currently being used as an office.	1	<ul style="list-style-type: none"> During the <i>Phase I EBS</i> of 18 Nov 96, pipes protruding from the ground outside each corner of Building 20 were designated EBS RIA 90. As summarized in enclosure (5), subsequent investigation indicated that they are sewage drainpipes and NFA is required. The <i>PIH Survey</i> of Aug 01 reported that ACMs remain in good condition. The <i>PIH Survey</i> of Aug 01 reported that building's interior and exterior paint remain in good condition.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
SPUD-9	75	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 75 (Barracks - former Bachelor Enlisted Quarters) is a 14,575 SF, two-story, masonry building that was constructed in 1953 and can accommodate up to 95 people (from Base construction in the 1940s to the early 1950s, another barracks building was present at this area and was demolished to make way for Building 75). In 1984, the built-up roof of Building 75 was replaced with a rubber membrane roof. Building 75 was unused from Base closure in Sep 97 until 2001, when it was leased to the SSTTDC and then subleased to the Massachusetts Justice Council for temporary lodging of trainees. As part of the sublease, Building 75 underwent major renovations.	1	<ul style="list-style-type: none"> • The suspected presence of a buried pallet of asbestos shingles at the south end of Building 75 was designated EBS RIA 46. As summarized in enclosure (5), the Navy has finalized a Decision Document and NFA is required. • The <i>PIH Survey</i> of Aug 01 reported that ACMs remain in fair condition. • The <i>PIH Survey</i> of Aug 01 reported that small amounts of peeling paint are present in the building's ceilings, walls, floors, and exterior. A dust wipe sample from the floor in the building (first floor hallway) was reported to contain 123 µg/SF of lead. Past samples were collected for the Nov 99 <i>PIH Survey</i>; however, Building 75 has since been renovated and cleaned.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
SPUD-9	103	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 103 (Dining Facility, or "Galley") could accommodate up to 250 people. Food was delivered and prepared here. In 1981, an addition was added to the west side of the building to install a boiler/mechanical room. A 550-gal fuel oil UST was installed outside the building near the new boiler room. As was done at other facilities at the Base, the new boiler was installed in order to provide heat to the building for part of the year so that the main steam plant at the Base could be shut down. The mechanical room of Building 103 was enlarged in 1989 in order to install a larger boiler. The 550-gal UST was removed in 1989 and replaced with a 2,000-gal fuel oil UST. The 2,000-gal UST was removed in Aug 01.	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/petroleum products are known to have been released or disposed of on the property. A UST leak test was addressed under EBS RIA 77. As summarized in enclosure (5), NFA is required for RIA 77. The <i>PIH Survey</i> of Aug 01 reported that ACMs remain in good condition except in the basement mechanical room, where a leaking pipe on the south wall caused some deterioration in adjacent ACM pipe insulation. The <i>PIH Survey</i> of Aug 01 reported that approximately 2,035 cubic feet (CF) of soil in the crawlspace of Building 103 contains asbestos debris. Clause 8(c) of enclosure (2) includes a restriction to address this ACM debris. The <i>PIH Survey</i> of Aug 01 reported that moderate amounts of interior paint are peeling. A wipe sample from the front entrance contained 69.5 µg/SF of lead. Past samples (Nov 99) contained 9.9 µg/SF (food preparation area), 463 µg/SF (north vestibule), 3,140 µg/SF (southeast corner of the basement), and 1,130 µg/SF (along east side of basement under duct). The building will not be reused for residential purposes; therefore, no remediation of lead dust is required by the Navy. See clause 8(f) of enclosure (2). Exterior paint is peeling; however, paint chip samples indicated that the exterior paint is not lead-based. The <i>PIH Survey</i> of Aug 01 reported the presence of "extremely elevated fungal concentrations in the building's air." See clause 8(g) of enclosure (2).

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
SPUD-9	106	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 106 (Transformer House) is a 224 SF, single-story structure. Transformers with PCBs were probably stored here at one time. At the time of the <i>Phase I EBS</i> of 18 Nov 96, Building 106 was used for the storage of fire protection electrical equipment and classroom furniture. Building 106 has no floor drains.	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. The <i>PIH Survey</i> of Aug 01 reported that no ACMs are present. The <i>PIH Survey</i> of Aug 01 reported that the building's interior is not painted and that the exterior paint remains in good condition.
SPUD-9	115	Yes, given restrictions outlined in clause 8 of enclosure (2)	Building 115 (Bachelors Enlisted Quarters - BEQ) is a 22,626 SF, three-story structure which was built in 1960. The area was forested prior to its construction. Building 115 could house up to 99 people. The building was heated from fuel oil stored in an UST located outside the building. Building 115 is currently leased to SSTDC and subleased as a rehabilitation center. The building has recently undergone renovation.	2	<ul style="list-style-type: none"> As summarized in enclosure (4), impacts from a domestic heating oil UST have been addressed under MCP RTN 3-15829 (final RAO has been filed). The <i>PIH Survey</i> of Aug 01 reported that ACMs remain in good condition. The <i>PIH Survey</i> of Aug 01 reported that painted surfaces remain in good condition. A dust wipe sample from the floor in the building was reported to contain <20 µg/SF of lead (i.e., non-detect).
SPUD-9	None in remainder	Yes, given restrictions outlined in clause 8 of enclosure (2)	The remainder of this subparcel contains the buildings' associated roads and grounds as well as a portion of Shea Memorial Drive.	2	<ul style="list-style-type: none"> As documented in the <i>CERFA report</i> of 28 Mar 97, Shea Memorial Drive was designated as "CERFA 1 clean." As summarized in enclosure (4), the Navy has cleaned and closed MCP RTN 3-13673 (Shea Memorial Drive spill) through a Class A-1 RAO.

TABLE 1 SUMMARY OF CONDITIONS (Continued)

Zoning Subparcel	Buildings	Suitable to Transfer?	History	ECP Category	Existing Environmental Conditions
SPUD-10	None	Yes, given restrictions outlined in clause 8 of enclosure (2)	This subparcel contains a portion of the northern length of the north-south Runway 17-35 (including taxiway). The subparcel also contains a portion of the clear zone west of the runway/taxiway and the median therein.	3	<ul style="list-style-type: none"> As documented in the <i>CERFA report</i> of 28 Mar 97, the runway and taxiway within this subparcel were designated as "CERFA 1 clean." The potential for PCBs in the runway's Optical Landing System (OLS) vaults was designated EBS RIA 1. One of these vaults was located within SPUD-10. As summarized in enclosure (5), NFA is required for RIA 1. Suspected overuse of herbicides around runway lighting areas was designated EBS RIA 2C. One of these areas was located within SPUD-10. As summarized in enclosure (5), NFA is required for RIA 2C.
TRE	None	Yes	The Trotter Road Extension (TRE) is a short section of Trotter Road owned by the Navy between the rail line and Route 18.	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. There are no environmental sites associated with this subparcel. There is also no ACM or lead-based paint (LBP) associated with this subparcel.
<p>Environmental Condition of Property (ECP) Categories:</p> <ol style="list-style-type: none"> Areas Where No Release or Disposal (Including Migration) Has Occurred. Areas Where Only Release or Disposal of Petroleum Products Has Occurred. Areas Where Release, Disposal, and/or Migration Has Occurred, but Require No Remedial Action. Areas Where Release, Disposal, and/or Migration Has Occurred, and All Remedial Actions Have Been Taken. Areas Where Release, Disposal, and/or Migration Has Occurred and Action is Underway, but All Required Remedial Actions Have Not Yet Been Taken. Areas Where Release, Disposal, and/or Migration Has Occurred, but Required Response Actions Have Not Yet Been Implemented. Unevaluated Areas or Areas Requiring Additional Evaluation. 					

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

Subparcel (a)	Building Number	Description	Substance Stored, Released, or Disposed	Quantity	Date(s) Stored, Released, or Disposed	CERCLA 120(h)(1) Reportable? (b)
SPUD-8	51	Rocket Magazine	Ordnance (stored)	Unknown	Circa 1940s to 1990s	No
SPUD-8	79/1 (c)	Fuel Farm UST No. 17	Jet fuel (JP-5 and JP-8) (stored)	219,300-gal UST (d)	1951 to 1992 (tank removed Spring 94)	No
SPUD-8	79/2 (c)	Fuel Farm UST No. 19	Jet fuel (JP-5 and JP-8) (stored)	219,300-gal UST	1951 to 1997	No
SPUD-8	79/3 (c)	Fuel Farm UST No. 18	Jet fuel (JP-5 and JP-8) (stored)	219,300-gal UST (d)	1951 to 1997	No
SPUD-8	79/4 (c)	Fuel Farm Jet Fuel Separator House	Waste JP-8 (stored)	55-gal drum	Unknown (observation noted in <i>Phase I EBS</i> of Nov 96)	No
SPUD-8	79/5 (c)	Fuel Farm UST No. 41A	Waste JP-5 jet fuel (stored)	550-gal UST	1951 to 1986/7	No
SPUD-8	90/1 (c)	Fuel Farm UST No. 22	AvGas (stored)	219,300-gal UST	1956 to Spring 94	No
SPUD-8	90/2 (c)	Fuel Farm UST No. 23	AvGas (stored)	107,660-gal UST	1956 to Spring 94	No
SPUD-8	90/4 (c)	Fuel Farm UST No. 41B	JP-5 jet fuel (stored)	550-gal UST	1951 to 1986/7	No
SPUD-8	102	NEX (general merchandise stock)	Engine Oil (stored)	Unknown	1963-1997	No
SPUD-8	102	NEX (general merchandise stock)	Anti-freeze (stored)	Unknown	1963-1997	No
SPUD-8	102	NEX (general merchandise stock)	Brake and transmission fluid (stored)	Unknown	1963-1997	No
SPUD-8	102	NEX (general merchandise stock)	Windshield washer fluid (stored)	Unknown	1963-1997	No

Subparcel (a)	Building Number	Description	Substance Stored, Released, or Disposed	Quantity	Date(s) Stored, Released, or Disposed	CERCLA 120(h)(1) Reportable? (b)
SPUD-8	102	NEX UST No. 24	Waste Oil (stored)	550-gal UST	Circa 1963-1994	No
SPUD-8	102	NEX	Trichloro-ethane (stored)	Unknown	Circa late 1970s/1981-1997	Yes
SPUD-8	102	NEX	Paint remover (stored)	Unknown	Circa late 1970s/1981-1997	Unknown
SPUD-8	102	NEX	Waste paint remover (stored)	55-gal drums	Circa late 1970s/1981-1997	Unknown
SPUD-8	102	NEX	Waste oil (stored)	55-gal drums	Circa late 1970s/1981-1997	No
SPUD-8	102	NEX	Engine oil (stored)	Phase I EBS reported "small amounts"	Circa late 1970s/1981-1997	No
SPUD-8	102	NEX	Baking soda (stored)	30-gal drums	Circa late 1970s/1981-1997	No
SPUD-9	103	Dining Facility UST	Heating oil (stored)	550-gal UST	1981 to 1989	No
SPUD-9	103	Dining Facility UST No. 29	Heating oil (stored)	2,000-gal UST	Jul 89 to Aug 01	No
SPUD-9	106	Storage shed	PCBs (stored transformers)	Unknown	Unknown	Yes
SPUD-9	115	BEQ UST	Heating oil (stored) (release addressed under MCP)	4,000-gal UST (unknown volume of release)	Circa 1977 to Dec 97 (unknown date of release)	No
SPUD-10	none	Aircraft arresting gear system	Antifreeze (stored)	300-gal reservoir	Unknown start until circa 1996	No
NOTES:						
(a) Acronyms and abbreviations used in this table are defined as follows:						
AvGas = Aviation Gasoline						
MCP = Massachusetts Contingency Plan						
BEQ = Bachelors Enlisted Quarters						
NAS = Naval Air Station						
CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act						
NEX = Navy Exchange						
CFR = Code of Federal Regulations						
PCBs = Polychlorinated Biphenyls						
EBS = Environmental Baseline Survey						
RTN = Release Tracking Number						
SPUD = Special Planned Use District						
Gal = Gallon						
UST = Underground Storage Tank						

- (b) Determination made from 40 CFR 302, Table 302.4 "List of Hazardous Substances and Reportable Quantities."
- (c) Releases of petroleum products from the Fuel Farm (no single source) have been addressed under MCP RTN 3-10858 (see enclosure [4]). However, the *Phase I EBS Report Errata* of 10 Nov 97 reported that reviews of the Fire Department Response Records identified 24 spills (fuel, jet fuel, JP-5, gasoline) at the Fuel Farm between 1968 and 1991. Response time varied between 13 minutes to 1 hour and 49 minutes. Released volumes of materials were reported for eight spills: six spills involving 10-100 gal of fuel, and two spills involving 50 and 100 gal of JP-5.
- (d) The *Phase I EBS* of 18 Nov 96 reported that approximately 200,000 gal of JP-8 were used per month by the former NAS South Weymouth.

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

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
Building 102 in SPUD-8	Trichloro- ethane (stored)	79005	1,1,2- methyl chloroform	U227	100 (45.4)	Unknown	Circa late 1970s/1981- 1997
Building 102 in SPUD-8	Paint remover (stored)	Unknown	Unknown	Unknown	Unknown	Unknown	Circa late 1970s/1981- 1997
Building 102 in SPUD-8	Waste paint remover (stored)	Unknown	Unknown	Unknown	Unknown	55-gal drums	Circa late 1970s/1981- 1997
Building 106 in SPUD-9	PCBs (stored trans- formers)	1336363	Aroclors	N.A.	1 (0.454)	Unknown	Unknown

NOTES:

- The information contained in this notice is required under the authority of regulations promulgated under Section 120(h) of CERCLA 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.
- Acronyms and abbreviations are as follow:
CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act
CAS = Chemical Abstract Service
Gal = Gallons
N.A. = Not available
PCBs = Polychlorinated Biphenyls
RCRA = Resource Conservation and Recovery Act
SPUD = Special Planned Use District
U.S.C. = United States Code

ENCLOSURE (2)
ENVIRONMENTAL COVENANTS, CONDITIONS, RESERVATIONS, AND RESTRICTIONS FOR
ZONING SUBPARCELS DESIGNATED INST-2, OS-C-3 AND 4, SPUD-8 THROUGH 10, AND THE
TROTTER ROAD EXTENSION (70.05 TOTAL ACRES), AT THE FORMER NAVAL AIR STATION
(NAS),
SOUTH WEYMOUTH, MASSACHUSETTS

1. Notice of Environmental Condition: Information concerning the environmental condition of Zoning Subparcels INST-2, OS-C-3 and 4, SPUD-8 through 10, and the Trotter Road Extension ("the subject subparcels") is contained in the following documents:

- (a) *Polychlorinated Biphenyls (PCB)-Free Activity Report*, NAS South Weymouth of 4 Jan 95.
- (b) *Asbestos, Lead Paint, and Radon Policies at BRAC Properties*, Office of the Under Secretary of Defense of 12 Jan 95.
- (c) *Release Notification and Response Action Outcome (RAO) Statement for South Weymouth Naval Air Station, Shea Memorial Drive, Weymouth, MA, Release Tracking Number (RTN) 3-13673*, ENSR of 14 Jun 96.
- (d) *Final Basewide EBS Phase I* by Stone & Webster Environmental Technology & Services of 18 Nov 96.
- (e) *Community Environmental Response Facilitation Act (CERFA) Determination Report*, NAS South Weymouth, Massachusetts by the Department of the Navy of 28 Mar 97.
- (f) *Phase I EBS Report Errata* by Stone & Webster Environmental Technology & Services of 10 Nov 97.
- (g) *Lead Remediation Survey* by Dewberry & Davis of 97.
- (h) *RAO Supporting Documentation Report, Barracks 115 Site* by Brown & Root Environmental of Feb 98.
- (i) *South Shore Tri-Town Development Corporation's (SSTTDC's) Governing Document as Approved by the Towns of Weymouth, Abington, and Rockland, Zoning and Land Use By-Laws for the Naval Air Station South Weymouth*, approved 24 Mar 98.
- (j) *Release Abatement Measure (RAM) Completion and RAO Supporting Documentation Report, Naval Exchange (NEX) Site (RTN 3-13316)* by Brown & Root Environmental of 15 Jul 98.
- (k) *South Weymouth NAS Reuse Plan and SSTTDC 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.
- (l) *BRAC Cleanup Plan (BCP)* by the BRAC Cleanup Team and EA Engineering, Science, and Technology of Oct 96 (revised Aug 98).
- (m) *Final Basewide EBS Phase II Sampling Work Plan* by Stone & Webster Environmental Technology & Services of 13 Oct 98.

- (n) *Geophysical Investigation, South Weymouth NAS* by Geophysics GPR International of 10 Dec 98.
- (o) *IRA Completion Report and Partial RAO, Jet Fuel Pipeline* of 12 Oct 99.
- (p) *Lead-Based Paint (LBP) Policy for Disposal and Residential Real Property*, DoD Memorandum of 7 Jan 00.
- (q) *Draft Phase II EBS Decision Document for RIA 55B, Area North of Trotter Road - Disposal Area* by Stone & Webster Environmental Technology & Services of Jan 01.
- (r) *Final U.S. Coast Guard (USCG) Integrated Support Detachment South Weymouth Buoy Depot Remedial Investigation (RI) Report*, EA Engineering, Science, and Technology of Feb 01.
- (s) Email from Ms. Jane Connet, EA Engineering, Science, and Technology, to Ms. Patty Marajh-Whittemore, EPA, and Mr. David Chaffin, MADEP, re: Updated Draft Table of EBS RIAs Requiring No Further Action (NFA) under the EBS of Aug 01.
- (t) *Potential Immediate Hazards (PIH) Survey and Materials Update for Asbestos and LBP, NAS South Weymouth, Massachusetts* by Dewberry & Davis updated as of Aug 01.
- (u) *RAO Supporting Documentation, Fuel Farm Site* by Tetra Tech NUS of Feb 02.
- (v) *EBS Review Items Requiring NFA under the EBS* by EA Engineering, Science, and Technology, effective 18 Jan 02 and signed in Feb 02.
- (w) *Final NFA Decision Document for EBS RIAs 42, 46, and 51* by EA Engineering, Science, and Technology of Apr 02.
- (x) *Final Phase II RI, Sewage Treatment Plant* by Tetra Tech NUS of Apr 02.
- (y) *Revised Phase II EBS Decision Document for RIA 2C, Runway Lighting* by Stone & Webster Environmental Technology & Services of 23 May 02.
- (z) *Final Closeout Report for RIA 2B, Runway 17-35, Supplement 4 to Final Work Plan CTO 48, Limited Removal Action*, CD Submittal No. CTO-48-31, by Foster Wheeler Environmental Corporation of 31 May 02.
- (aa) *Final Phase II EBS Decision Document for RIA 78C, Undocumented UST Removal - UST No. 24* by Stone & Webster Environmental Technology & Services of 12 Jun 02.
- (bb) *Revised Phase II EBS Decision Document for RIA 47, Navy Exchange* by EA Engineering, Science, and Technology of Aug 02.
- (cc) *Draft Final Phase II EBS Decision Document for RIA 1, Optical Landing System (OLS) Vaults* by EA Engineering, Science, and Technology of Sep 02.

- (dd) *Final Engineering Evaluation and Cost Analysis for TACAN Outfall Sediment Removal and Storm Sewer System Cleaning*, CD Submittal No. CTO-26-10, by Foster Wheeler Environmental Corporation of 23 Oct 02.
- (ee) *Response to EPA Comments on the Phase II EBS Draft Final Decision Document for Review Item Area 1, OLS Vaults* by EA Engineering, Science, and Technology of 1 Nov 02.
- (ff) *Final Streamlined Ecological Risk Assessment for RIA 55B* by Stone & Webster Environmental Technology & Services of 26 Nov 02.
- (gg) *Final Streamlined HHRA for RIA 55B* by EA Engineering, Science, and Technology of 13 Dec 02.
- (hh) *Response to MADEP Comments on the Revised Phase II EBS Decision Document for RIA 47, Navy Exchange* by EA Engineering, Science, and Technology of Dec 02.
- (ii) *Draft Final Feasibility Study, Sewage Treatment Plant* by EA Engineering, Science, and Technology of Dec 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 U.S. 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 FFA for the NAS South Weymouth National Priorities List (NPL) site is completed at the NAS South Weymouth 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 NAS South Weymouth 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 Finding of Suitability to Transfer (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, any 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 CERCLA (42 USC 9601 *et seq.*) and 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 Indemnatee "caused or contributed to" excludes actions by an Indemnatee 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 Indemnatee's actions are in accordance with applicable federal, state, and local laws, (b) the Indemnatee notifies the GRANTOR in accordance with the notification provisions contained herein, and (c) the Indemnatee'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 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) No groundwater extraction/production/supply wells shall be installed or permitted by the GRANTEE(s) and no access to groundwater shall be permitted in Subparcels OS-C-4, SPUD-8, SPUD-9, or SPUD-10. Construction in SPUD-10 shall be slab-on-grade. Appropriate air monitoring for volatile organic compounds (VOCs) is required prior to occupancy of any new construction in SPUD-10. The Navy is currently evaluating chemical impacts to groundwater at the nearby Building 81 Site (Installation Restoration [IR] Program Site 9), the Building 82 Site (Hangar 2, IR Program Site 10), IR Program Site 7 (Sewage Treatment Plant), and AOC-30B (spills off the Hangar 2 Apron). The restriction under this clause is due to the potential, if extraction wells were to be installed, to draw impacted groundwater from those areas toward the currently non-impacted areas of the FOST subparcels. This restriction can be removed once the Navy, EPA Region I, and MADEP provide written approval that groundwater at Site 9, the Site 10, Site 7, and AOC-30B poses no unacceptable risks to human health or the environment in the FOST subparcels.

(b) 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., RIA 46 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 federal, state, and local regulations.

(c) Due to the presence of asbestos debris in the soil of the crawlspace floor of Building 103 (Dining Facility), the GRANTEE shall restrict access to the crawlspace of Building 103 to authorized and trained personnel wearing protective clothing and respirators. The GRANTEE shall placard and secure the entrance to the crawlspace in order to prevent unauthorized access. This restriction can be removed provided that the identified damaged ACMs are properly abated and disposed of in accordance with federal, state, and local asbestos regulations.

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

(e) So long as the Navy is conducting environmental investigations in other areas at the former 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. The Navy retains the right to approve or deny the installation of such a well on a case-by-case basis if there is a potential to draw groundwater from the Navy's investigation areas.

(f) The past *PIH Surveys* of Nov 99 and Aug 01 reported that lead dust was detected in a wipe sample from the floor of Building 51 - Magazine (660.2 micrograms per square foot [$\mu\text{g}/\text{SF}$]) and in the north vestibule and basement floors of Building 103 - Dining Facility (463 $\mu\text{g}/\text{SF}$ and up to 3,140 $\mu\text{g}/\text{SF}$, respectively). Because Buildings 51 and 103 will not be used for residential purposes, NFA is required by the Navy to address lead dust. However, protective footgear is recommended inside the affected areas of Buildings 51 and 103 and respirators are required for any activities that may significantly disturb the lead dust (e.g., renovation workers). This requirement can be removed 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. If the building is reopened for use, and the lead dust is not cleaned up, then the GRANTEE (or its successors) must install warning signs on the entranceways that indicate the presence of lead dust within the building.

(g) Due to the indoor air hazard (fungal) identified in Building 103 (Dining Facility), users of Building 103 shall don protective clothing and respirators when inside the building. This requirement can be removed if the GRANTEE abates the fungus hazard within the building.

END

ENCLOSURE (3)
SUMMARY OF INSTALLATION RESTORATION (IR) PROGRAM SITES

Note: This is a summary of the Navy's IR Program Sites within (shaded row) or nearby (within 200 ft of) the subparcels in this Finding of Suitability to Transfer (FOST). IR Program Sites are addressed in accordance with the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This summary table indicates whether any of these areas have potential impacts to or restrictions for the subparcels included in this FOST. As shown in this table, there are no ongoing IR Program site investigations within the FOST subparcels.

IR Program Site	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
1	West Gate Landfill	45 ft west of Special Planned Use District (SPUD)-10 and Open Space Central (OS-C)-4	Past disposal of domestic and potentially other wastes from the Base.	Finalized Phase II Remedial Investigation (RI). Ongoing Feasibility Study (FS) to develop remedial alternatives.	None identified. Site 1 is across French Stream from FOST subparcels. Warning signs are in place to discourage trespassing.	None.	Final Phase II RI of 12 Apr 02 and Draft Final FS of Mar 02.
6	Former Fuel Farm	Within SPUD-8 and OS-C-4	Jet fuel and aviation gas releases.	No Action under CERCLA or the Navy's IR Program. Addressed under Massachusetts Contingency Plan (MCP) and underground storage tank programs. See enclosure (4).	None identified.	None.	See enclosure (4).

IR Program Site	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
7	Former Sewage Treatment Plant	Abuts OS-C-4 and 50 ft northwest of SPUD-8	Potential past disposal of chemicals into the sewage treatment system.	Completed final Phase II RI. Ongoing FS to develop remedial alternatives for the protection of human health and the environment. Human health risks associated with hypothetical future onsite residents and future onsite recreational children.	None identified. Chemicals of concern not found to be migrating to FOST subparcels. No residential use at Site 7 or in the adjacent FOST subparcels. Warning signs are in place to discourage trespassing (although RI indicated no unacceptable risks to trespassers).	None.	Final Phase II RI of 24 Apr 02. Draft final FS of Dec 02.
8	Abandoned Bladder Tank Fuel Storage Area	10 ft from OS-C-4 and 175 ft northeast of SPUD-10	Past storage of aviation gasoline for hot refueling operations.	Completed final Phase II RI and final "No Action" Proposed Plan. No unacceptable risks to human health or the environment. The Navy is preparing a No Action Record of Decision.	None identified.	None.	Final Phase II RI of 13 Mar 02. Final Proposed Plan of Oct 02. Draft ROD of Dec 02.

IR Program Site	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
9	Building 81	20 ft from SPUD-9	Former motor pool. Bedrock groundwater impacted with chlorinated solvents. Former Review Item Area (RIA) 28 and MCP Release Tracking Numbers (RTNs) 3-10628 and 3-11622. Moved to IR Program in Spring 1999.	Navy conducted a pilot study of <i>in situ</i> chemical oxidation for groundwater. Navy plans to conduct an RI in accordance with CERCLA.	None identified under current conditions. Potential hazard if groundwater extraction wells are installed in an adjacent subparcel for drinking water use. Warning signs and fencing are in place to discourage trespassing.	No ground-water extraction or use permitted in SPUD-9 pending completion of Site 9 investigations. See clause 8(a) of enclosure (2).	Pending pilot study report. Draft final RI Work Plan of Sep 02.

IR Program Site	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
10	Hangar 2 (Building 82)	100 ft from OS-C-4 and 100 ft west of SPUD-9	Identified chlorinated volatile organic compounds (VOCs) in groundwater above action levels.	Former MCP RTN 3-18110 and previously addressed under the Environmental Baseline Survey (EBS)/Various Removal Action (VRA) programs. Now includes EBS Review Item Areas (RIAs) 30A and 107. Navy has cleaned and removed floor drain system and oil/water separator. Navy plans to initiate an RI under CERCLA.	None identified. Potential hazard if groundwater extraction wells are installed in an adjacent subparcels for drinking water use. Warning signs and fencing are in place to discourage trespassing.	No ground- water use or extraction permitted in subparcels OS-C-4, SPUD-8, SPUD-9, or SPUD-10. Slab on grade construc- tion and air monitoring for VOC required in SPUD-10 as a precaution until data confirm no hazard for the adjacent FOST subparcel. See clause 8(a) of enclosure (2).	Draft RI Work Plan of Aug 02.

ENCLOSURE (4)
SUMMARY OF MASSACHUSETTS CONTINGENCY PLAN (MCP) SITES

Note: This is a summary of the state-listed MCP Release Tracking Numbers (RTNs) within (shaded rows) or nearby (within 200 ft of) the subparcels in this Finding of Suitability to Transfer (FOST). This summary table indicates whether any of these areas have potential impacts to or restrictions for the subparcels included in this FOST. As shown in this table, there are no ongoing MCP investigations within the FOST subparcels (i.e., the Navy has completed work at, and closed, the former MCP sites within the FOST subparcels).

MCP RTN	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-10628 and 3-11622	Building 81	20 ft (down-gradient) from Special Planned Use District (SPUD)-9	Former motor pool and underground storage tank (UST) containing waste oil and waste perchloroethene. Bedrock groundwater impacted with chlorinated solvents.	The site work has been transferred from the MCP program to the Navy's Installation Restoration (IR) Program. See summary for Site 9 in enclosure (3).	See enclosure (3).	See enclosure (3).	Massachusetts Department of Environmental Protection (MADEP) letter of 30 Mar 99.

MCP RTN	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-10858	Former Fuel Farm	Within Open Space Central (OS-C)-4 and SPUD-8	Jet fuel and aviation gas releases.	Closed (Response Action Outcome [RAO] filed Feb 02). No Activity and Use Limitation (AUL). Approximately 1,500 tons of petroleum-impacted soil were removed during Spring 94. USTs and piping were removed during 1994-1997. Impacted soil from the site and a drainage swale were removed in Fall 01. Completion of Phase IV activities in Dec 01. An isolated/point exceedance of the GW-2 standard in one well received additional remediation.	None identified. No ground-water hazards from this GW-2/GW-3 area. Isolated pockets of petroleum-related compounds remain in site soil; however, the soil Exposure Point Concentration does not exceed S-1 standards.	None.	Class A-2 RAO of Feb 02.
3-13316	Navy Exchange (NEX), (Building 102)	Partially within SPUD-8	Former gasoline filling station.	Closed (RAO filed). Removed the filling pumps, the three USTs, and approximately 3,500 CY (1,500 CY impacted) of soil in Dec 97. Soil and groundwater meet MCP standards. No free product found.	None identified.	None.	Class A-2 RAO of 15 Jul 98.

MCP RTN	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-13673	Shea Memorial Drive spill	Within Institutional (INST)-2, OS-C-3, and SPUD-9	Release of approximately 41 gal 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.
3-14646	Tanks 9A and 9B (Buildings 11 and 15)	90 ft south of SPUD-9	Release of gasoline.	Closed (RAO filed). USTs and impacted soil removed during 17-19 Dec 96.	None identified.	None.	Class A-2 RAO of Oct 97.
3-15289	Swimming Pool (Building 105)	100 ft east of SPUD-9	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)	190 ft northeast of Trotter Road Extension	Release of No. 2 fuel oil.	Closed (RAO filed). UST and impacted soil removed during 28-29 Jul 97.	None identified.	None.	Class A-2 RAO of Dec 97.

MCP RTN	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-15379	Dispensary (Buildings 24 and 98)	145 ft west of OS-C-3	Petroleum-impacted soil beneath Building 98 from No. 2 fuel oil UST (estimated 50-gal release likely from minor overfills, loose fittings, or weakened seams of the aged tank and fittings).	Closed (RAO and AUL filed). UST and 100 cubic yards (CY) of soil were removed on 12 Aug 97. No impacts to groundwater were identified. AUL filed to address residual petroleum beneath Building 98.	None identified.	None.	Immediate Response Action (IRA) Completion Report and Class A-3 RAO of 3 May 00.
3-15829	Barracks (Building 115)	Within SPUD-9	Impacts from domestic (No. 2) heating oil identified during UST removal.	Closed (RAO filed). UST, piping, and approximately 85 CY of impacted soil removed in Dec 97.	None identified.	None.	Class A-2 RAO of Feb 98.

MCP RTN	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-16598	Jet Fuel Pipeline Site (pipeline portion)	Within OS-C-4 and SPUD-10 and 50 ft southwest of SPUD-8	Releases from jet fuel pipeline.	Closed (RAO filed for the pipeline portion of this RTN). Removed 4,200 ft of pipeline and 1,000 CY of impacted soil from the area during Mar-May 98. Achieved condition of "No Significant Risk" for the pipeline. The ongoing additional investigation under this RTN (jet fuel pipeline holding tank area) is located outside of, and does not affect, the FOST subparcels.	None identified.	None.	IRA Completion Report and Partial RAO of 12 Oct 99.
3-18110	Hangar 2 (Building 82)	100 ft west of SPUD-9	Petroleum release. Floor drain system failure.	The site work has been transferred from the MCP program to the Navy's IR Program. See summary for Site 10 in enclosure (3).	See enclosure (3).	See enclosure (3).	MADEP letter of 7 Apr 00.
3-19064	Aviation Gasoline (AvGas) USTs, Former Location of Buildings 34, 35, 36 and 37	Abuts SPUD-10	Three former AvGas USTs.	Closed (RAO filed). MADEP Notification of 10 Dec 99. Phase I Initial Site Investigation and Tier Classification of 14 Nov 00. RAM completed for the removal of impacted soil in Oct/Nov 00.	None identified.	None.	Class A-2 RAO of 12 Jun 01.

MCP RTN	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcel?	Restriction for this FOST?	References
3-2621	Basewide National Priorities List	Basewide	General RTN that is part of Basewide MCP programs. Not associated with a particular release.	This administrative listing will be active until Basewide MCP closeout.	None identified. Administrative RTN only.	None.	Pending.

ENCLOSURE (5)

SUMMARY OF ENVIRONMENTAL BASELINE SURVEY (EBS) REVIEW ITEM AREAS (RIAs)

Note: This is a summary of the EBS RIAs within (shaded rows) or nearby (within 200 ft of) the subparcels in this Finding of Suitability to Transfer (FOST). This summary table indicates whether any of these areas have potential impacts to or restrictions for the subparcels included in this FOST.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 1	Runway/ Taxiway Optical Landing System (OLS) Vaults	Partially within Special Planned Use District (SPUD)-10	Potential releases from transformers within the vaults.	No Further Action (NFA) (regulators concur). Navy has removed the transformers and also has cleaned, sampled, and closed the vaults.	None identified.	None.	Draft Final NFA Decision Document of Sep 02. Response to EPA Comments of 1 Dec 02.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 2B	Runway/ Taxiway Area - North of 17-35	Within Open Space Central (OS-C)-4	Potential past releases of petroleum products from aircraft operations.	NFA (regulators concur). During the Phase II EBS, no human health or ecological risk-based benchmarks were exceeded by the existing sampling data. In response to regulatory requests for additional sampling, the Navy preemptively conducted a soil removal (limited removal action) during Jan 02 to address lead and polycyclic aromatic hydrocarbons (PAHs) that may have been associated with fuel.	None identified.	None.	Final Closure Report (CD Submittal CTO-48-31) of 31 May 02. Addendum to the NFA Decision Document of Oct 02.
RIA 2C	Runway/ Taxiway Area - Runway Lighting	Partially within OS-C-4 and SPUD-10	Sparse vegetation between taxiways and runways. Suspected over-use of herbicides at various locations.	NFA (regulators concur). Although some herbicide samples exceeded benchmarks, the concentrations were consistent with background levels and normal application procedures for herbicides. Collected additional samples as confirmation.	None identified.	None.	Revised Draft NFA Decision Document of 21 May 02.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 19	Trans- portation Garage (Building 15)	140 ft south of SPUD-9	Abandoned 2,000-gal underground storage tanks (USTs) No. 9A and 9B filled with sand.	NFA (regulators concur). Addressed and closed under The Massachusetts Contingency Plan (MCP) Release Tracking Number (RTN) 3-14646. See enclosure (4).	None identified.	None.	EBS NFA letter of 18 Jan 02.
RIA 20	Trans- portation Garage (Building 15)	160 ft south of SPUD-9	Approximate 20-gal hydraulic oil spill.	NFA (regulators concur). Spills were managed per Spill Pollutant Containment and Countermeasures Plan.	None identified.	None.	Phase I EBS of 18 Nov 96; Final Phase II Work Plan Screening Matrix. EBS NFA letter of 18 Jan 02.
RIA 21	Trans- portation Garage (Building 15)	160 ft south of SPUD-9	No record of removal of hydraulic lifts.	Hydraulic lift pits removed in Aug 92. Navy conducted additional sampling in Fall 2002.	None identified.	None.	Pending.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 24	Ordnance Shop (Building 50)	50 ft from OS-C-4, 130 ft south of SPUD-8	Presence of oil/water separator connected to leach field.	Proposed NFA (pending regulatory concurrence on decision document and septic system closure report). Various Removal Action (VRA) completed. Additional sampling conducted in Fall 02 to obtain confirmatory sample data.	None identified.	None.	Removal Action Report of Jan 99. Draft Decision Document of 2 Oct 01 (pending revision). Septic system closure report.
RIA 25	Fuel Tank Farm	Within SPUD-8 and partially within OS-C-4	Oil/water separator.	NFA (regulators concur). Addressed as part of MCP RTN 3-10858. See enclosure (4).	None identified.	None.	EBS NFA letter of 18 Jan 02.
RIA 26	Jet Fuel Separator House	Within SPUD-8 and 150 ft from OS-C-4	Floor drain destinations unknown.	NFA (regulators concur). Addressed as MCP RTN 3-10858. Building and soil removal resolved floor drain issue. See enclosure (4).	None identified.	None.	EBS NFA letter of 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 27	Marine Air Reserve Training Building (Building 81)	45 ft south of SPUD-9	Staining on concrete pad.	NFA (regulators concur). Moved to MCP RTN 3-10628. MCP site transferred to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (now Installation Restoration [IR] Site 9). See enclosure (3).	See enclosure (3).	See enclosure (3).	EBS NFA letter of 18 Jan 02.
RIA 28	Marine Air Reserve Training Building (Building 81)	45 ft south of SPUD-9	Unplugged floor drain destination unknown.	NFA (regulators concur). 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).	Final Phase II Work Plan Screening Matrix, Table 2-2. EBS NFA letter of 18 Jan 02.
RIA 29	Wash Rack (Facility 126)	160 ft south of SPUD-9	Wash Rack diversion valve was inoperative maintenance issue.	NFA (regulators concur). The maintenance (repair) was completed.	None identified.	None.	Final Phase II Work Plan Screening Matrix, Table 2-2; Phase I EBS Report Errata of 10 Nov 97. EBS NFA letter of 18 Jan 02

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 30A	Hangar 2 - Spills on apron	150 ft west of SPUD-9	Spills on aprons surrounding hangar. Benzene in groundwater exceeds benchmarks.	NFA under EBS (regulator concur). To be handled under IR Program for Hangar 2. See enclosure (3).	See enclosure (3).	See enclosure (3). See clause 8 of enclosure (2).	Draft Final Decision Document of 31 May 02.
RIA 30B	Hangar 2 - Spills off edge of apron	40 ft east of SPUD-10 and OS-C-4 and 85 ft northwest of SPUD-9	Spills on aprons surrounding hangar.	NFA under EBS (regulators concur). Currently being addressed as a CERCLA Area of Concern (AOC). See enclosure (6).	See enclosure (6).	See enclosure (6). See clause 8 of enclosure (2).	Draft Decision Document of 7 Mar 00.
RIA 31	Fire Protection Pump House at Fuel Farm	120 ft southeast of OS-C-4	Acid staining and pitting beneath battery rack.	NFA (regulators concur). Minor pitting on otherwise good concrete.	None identified.	None.	Phase I EBS of 18 Nov 96; Final Phase II Work Plan Screening Matrix. EBS NFA letter of 18 Jan 02.
RIA 32	Non-Potable Water Supply	70 ft southeast of OS-C-4	UST used to store water for Naval Air Station fire protection system.	Initially proposed NFA. Navy sampled to confirm NFA. Data reported in Removal Action Report. Pending regulatory concurrence.	None identified.	None.	Phase I EBS of 18 Nov 96. Final Removal Action Report of May 02.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 34	Marine Hot Refueler Area	65 ft southeast of SPUD-10	Large area of sparse vegetation.	Proposed NFA (pending regulatory concurrence) because chemicals detected were within background levels. Navy conducted additional groundwater sampling to confirm NFA.	None identified (ground-water flows south/southwest and not northwest toward the subparcel).	None.	Revised Decision Document of 27 Sep 00. Work Plan of Jan 02.
RIA 38	Former Location of Buildings 34, 35, 36 and 37	Abuts SPUD-10	Former location of three large partially covered USTs and pump house.	NFA (regulators concur). Addressing as MCP RTN 3-19064. See enclosure (4).	None identified.	None.	Final Phase II Work Plan Screening Matrix, Table 2-2. EBS NFA letter of 18 Jan 02.
RIA 42	Subsurface asbestos-lined pipes	15 ft from SPUD-9	Buried asbestos-lined pipes located southwest of Building 20 (transient housing).	NFA (regulators concur). 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. Base Realignment and Closure (BRAC) Cleanup Team (BCT) agrees to leave subsurface utilities in place.	None identified.	None.	Final NFA Decision Document for EBS RIAs 42, 46, and 51 of 11 Apr 02.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 43	Dispensary Fill Pipe (Building 24)	90 ft west of OS-C-3	An unidentified fill pipe was thought to be connected to a possible abandoned UST.	NFA (regulators concur). 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.	EBS NFA letter of 18 Jan 02.
RIA 44	Dispensary Building Boiler (Building 98)	150 ft west of OS-C-3	Soot on floor, ceiling, and walls in Building 98 due to boiler.	NFA (regulators concur). The malfunctioning boiler was addressed as a maintenance issue (boiler was repaired and the soot was cleaned up).	None identified.	None.	Phase I EBS of 18 Nov 96; Final Phase II Work Plan Screening Matrix, Table 2-2. EBS NFA letter of 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 46	Barracks	Within SPUD-9	Reported presence of buried pallet of asbestos shingles.	NFA (regulators concur). Conducted 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.	Approved Health and Safety Plan required for excavation work in this area. See clause 8(b) of enclosure (2).	Final NFA Decision Document for EBS RIAs 42, 46, and 51 of 11 Apr 02.
RIA 47	Navy Exchange (Building 102)	Within SPUD-8	Hydraulic lifts and oil/water separator.	NFA (regulators concur). The hydraulic lifts were removed as part of a VRA and confirmatory samples had concentrations consistent with background values. Follow-up work under the EBS confirmed that NFA is required.	None identified.	None.	Revised Decision Document of Aug 02. Response to MADEP Comments on the Revised Phase II EBS Decision Document of Dec 02.
RIA 48	Navy Exchange Filling Station	Partially within SPUD-8	UST leak detection test failure.	NFA (regulators concur). Addressed as part of MCP RTN 3-13316. See enclosure (4).	None identified.	None.	EBS NFA letter of 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 49	Swimming Pool	35 ft east of SPUD-9	Discharge of chlorinated pool water.	NFA (regulators concur). This compliance issue was handled with the Massachusetts Water Resources Authority (MWRA).	None identified.	None.	Phase I EBS of 18 Nov 96; Final Phase II Work Plan Screening Matrix, Table 2-2. EBS NFA letter of 18 Jan 02.
RIA 50	Child Care Center (Building 128)	135 ft east of SPUD-9	Possible Lead-Based Paint (LBP) in soil from Hobby Shop's peeling paint.	Proposed NFA (pending regulatory concurrence). Lead concentrations did not exceed regulatory standards (Lead Remediation Survey of 1997 and Lead in Soil Sample Results of Jun 97.)	None identified.	None.	Phase I EBS of 18 Nov 96; Final Phase II Work Plan Screening Matrix, Table 2-2. EBS NFA table of Aug 01.
RIA 55B	Area North of Trotter Road - Debris area	20 ft west of OS-C-4 (across French Stream)	Potential releases associated with solid waste disposed over a large, heavily wooded area.	NFA under EBS (regulators concur). Being addressed as a CERCLA Area of Concern (AOC). See enclosure (6).	None identified.	None.	Draft Decision Document of Jan 01.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 57	U.S. Coast Guard (USCG) Buoy Depot Facility	85 ft southeast of the Trotter Road Extension	Concerns about use of waste oil on USCG facility.	NFA (regulators concur). Phase II EBS data incorporated into USCG's remedial investigation (RI). Sediment south of facility to be addressed by USCG.	None identified.	None.	EBS NFA letter of 18 Jan 02. Final USCG RI Report of Feb 01.
RIA 58	USCG Buoy Depot Facility	85 ft southeast of the Trotter Road Extension	Concerns about facility septic system.	NFA (regulators concur). RIA addressed by USCG's RI under CERCLA; NFA for septic system under RI.	None identified.	None.	EBS NFA letter of 18 Jan 02. Final USCG RI report of Feb 01.
RIA 59	USCG Buoy Depot Facility	85 ft southeast of the Trotter Road Extension	Report of "Haz Waste" container.	NFA (regulators concur). The report was erroneous (no such container existed). Addressed under USCG's CERCLA RI.	None identified.	None.	Phase I EBS of 18 Nov 96; Final Phase II Work Plan Screening Matrix, Table 2-2. EBS NFA letter of 18 Jan 02. Final USCG RI report of Feb 01.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 62	French Stream	20 ft west of OS-C-4 and SPUD-10	Past releases entered the southern portion of the stream on Base property.	To be determined. Navy will be conducting a watershed ecological risk assessment (ERA).	None identified. Potential impacts are unlikely to extend beyond the immediate stream area.	None.	Pending.
RIA 76	Basewide Solid Waste	Various areas identified Basewide (including within the FOST subparcels)	Areas of solid waste and/or debris.	Initially proposed NFA under the EBS. Instead, individual areas are now being addressed on a case-by-case basis as necessary to support property transfers. See enclosure (8) for solid waste/debris items 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 Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 77	Basewide USTs - Leak Tests	Within SPUD-8 (Buildings 79/2 and 79/3) and SPUD-9 (Building 103)	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 150), 34 (Building 116), and 43 (Building 8). See Table 10-4 of the Phase I EBS of 18 Nov 96.	NFA (regulators concur). USTs addressed under Base Closure Program. EBS recommended NFA for UST Nos. 29 and 43 because local by-laws do not require testing for tanks of less than 15 years of age. Navy has removed all USTs at the Base except at Building 133. Tracer tests were performed.	None identified.	None.	Phase I EBS of 18 Nov 96; Phase I EBS of 18 Nov 96; Final Phase II Work Plan Screening Matrix, Table 2-2. Removal Action Report. EBS NFA letter of 18 Jan 02.
RIA 78A	Basewide USTs - Removal not documented - UST No. 12 at Building 41	190 ft south of SPUD-9	UST survey of Mar 97 provided no confirmation of proper closure.	NFA (regulators concur). No analyte exceedances were detected.	None identified.	None.	Final Revision 1 Decision Document of 29 May 02.
RIA 78C	Basewide USTs - Removal not documented - UST No. 24 at Building 102	Within SPUD-8	Undocumented removal of UST No. 24 at Building 102 (Navy Exchange).	NFA (regulators concur). Groundwater and soil samples confirmed that NFA is required.	None identified.	None.	Final NFA Decision Document of 12 Jun 02.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 79	Basewide Asbestos	Various locations Basewide	Presence of asbestos-containing materials.	NFA (regulators concur). Ongoing evaluations and abatements for individual locations as necessary in accordance with Department of Defense policy.	See Table 1 of enclosure (1).	See clause 8 of enclosure (2).	Final Phase II Work Plan Screening Matrix, Table 2-2. EBS NFA letter of 18 Jan 02.
RIA 80	Basewide LBP	Various locations Basewide	Presence of LBP.	NFA (regulators concur). Ongoing evaluations and abatements for individual locations as necessary in accordance with Department of Defense policy.	See Table 1 of enclosure (1).	See clause 8 of enclosure (2).	Final Phase II Work Plan Screening Matrix, Table 2-2. EBS NFA letter of 18 Jan 02.
RIA 90	Transient Housing	Within SPUD-9	Pipes protruding from ground (located 4-6 ft away from the east and west sides of Building 20).	NFA (regulators concur). Pipes were confirmed as sewage drainpipes that are connected to the MWRA. Originally connected to cesspool that was removed in 1992.	None identified.	None.	Phase I EBS of 18 Nov 96; Final Phase II Work Plan Screening Matrix; and EBS Phase I Report Errata of 10 Nov 97. EBS NFA letter of 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 91	Navy Exchange Filling Station	Partially within SPUD-8	Unreported, incidental drips/spills from the former filling station.	NFA (regulators concur). Addressed as part of MCP RTN 3-13316. See enclosure (4).	None identified.	None.	EBS NFA letter of 18 Jan 02.
RIA 95C	PCB Storage/Use Building 16	Abuts SPUD-9	Former PCB-containing transformers in the basement of Building 16.	Ongoing Phase II EBS. In Fall 01, the Navy completed a removal action to close the floor drains and document their discharge to the stormwater system. Confirmatory sample results indicate that conditions do not pose a hazard. Likely NFA.	None identified.	None.	Final Removal Action Report (CD Submittal No. CTO-48-28) of 13 May 02. Draft Decision Document of 8 July 02.
RIA 97	Fire Department spill response records	Various (including within OS-C-4)	Past Fire Department Responses.	NFA (regulators concur). This was a temporary RIA number used to track from the Phase I to Phase II EBS (used to specify sampling at RIAs 2A, 2B, 2D, 2E, 10A, and 30B).	None identified.	None.	Phase I EBS of 18 Nov 96; Phase II Work Plan Screening Matrix. EBS NFA letter of 18 Jan 02.

EBS RIA	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
RIA 103	USCG Buoy Depot Facility	85 ft southeast of the Trotter Road Extension	Battery storage area.	NFA (regulators concur). Addressed by USCG RI.	None identified.	None.	EBS NFA letter of 18 Jan 02. Final USCG RI report of Feb 01.
RIA 107	Hangar 2 - Spills on apron	160 ft from SPUD-9	Spills on runway apron.	NFA under the EBS. Previous Phase II EBS and VRA work included testing along drain system. Possible sectioning of drain system for testing. To be included in investigation for IR Program Site 10. See enclosure (3).	See enclosure (3).	See enclosure (3). See clause 8 of enclosure (2)	See enclosure (3).

ENCLOSURE (6)
SUMMARY OF CERCLA AREAS OF CONCERN (AOCs)

Note: There are no current or former Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) AOCs located within the subparcels of this Finding of Suitability to Transfer (FOST). This table summarizes the status of AOCs nearby (within 200 ft of) the FOST subparcels. This summary table indicates whether any of these areas have potential impacts to or restrictions for the subparcels included in this FOST.

AOC	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
30B	Hangar 2 - Spills off edge of apron	40 ft east of SPUD-10 and OS-C-4 and 85 ft northwest of SPUD-9	Spills on aprons surrounding hangar. Detected cadmium, chromium, and polychlorinated biphenyls (PCBs) in soil and polycyclic aromatic hydrocarbons (PAHs) and PCBs in sediment.	The Navy will include AOC 30B in the Tactical Air Navigation (TACAN) Outfall Removal Action (designated AOC 61, which is located well outside of the FOST area). The Navy prepared an Engineering Evaluation/Cost Analysis (EE/CA) to support the removal action. AOC 61 will require a CERCLA Proposed Plan and a Record of Decision (ROD).	None identified; impacts are limited to a drainage ditch outside of the FOST subparcels. Groundwater from AOC 30B does not flow toward FOST subparcels under ambient conditions.	No ground-water use or extraction permitted in subparcels OS-C-4, SPUD-8, SPUD-9, or SPUD-10. See clause 8(a) of enclosure (2).	Final EE/CA of 23 Oct 02.

AOC	Description	Approximate Distance to Nearby FOST Subparcels	Site Concern	Status	Potential Impacts to FOST Subparcels?	Restriction for this FOST?	References
55B	Debris area north of Trotter Road	20 ft west of OS-C-4 (across French Stream)	Obvious solid waste disposal over a large heavily wooded area. Antimony, chromium, mercury, and pesticides exceeding benchmarks and background levels in soil.	Formerly investigated under Phase II EBS. Resampled in May/Jun 01. Prepared Human Health Risk Assessment (HHRA) and Ecological Risk Assessment (ERA). Results indicated no unacceptable human health risk, and low ecological risk. The ecological risk is associated primarily with the wetland area in the northwest portion of the site. That area (over 1,000 ft away from the FOST subparcels) was re-designated as AOC 55D and will be addressed separately from AOC 55B. AOC 55B is likely to require CERCLA Proposed Plan and ROD.	None identified; impacts are limited to soil on the opposite side of French Stream.	None.	Draft Decision Document of Jan 01. Final Stream-lined ERA of 26 Nov 02. Final Stream-lined HHRA of 13 Dec 02.

ENCLOSURE (7)

RESPONSIVENESS SUMMARY

**ADDRESSING COMMENTS ON THE DRAFT FINDING OF
SUITABILITY TO TRANSFER FOR SEVEN ZONING SUBPARCELS
DESIGNATED INST-2, OS-C-3, OS-C-4, SPUD-8, SPUD-9,
SPUD-10, AND THE TROTTER ROAD EXTENSION (68.9 TOTAL
ACRES) AT THE FORMER NAVAL AIR STATION SOUTH WEYMOUTH,
MASSACHUSETTS**



Prepared by

EA Engineering, Science, and Technology
Southborough Technology Park
333 Turnpike Road (Route 9)
Southborough, Massachusetts 01772

Prepared for

Department of the Navy
Engineering Field Activity Northeast
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop #82
Lester, Pennsylvania 19113-2090

January 2003

RESPONSIVENESS SUMMARY

TABLE OF CONTENTS

Introduction	2
EPA General Comments	4
EPA Specific Comments on the Memorandum for the Record	10
EPA Specific Comments on Enclosure (1)	11
EPA Specific Comments on Enclosure (2)	26
EPA Specific Comments on Enclosures (3), (4), and (5)	26
MADEP Comments on the Memorandum for the Record	28
MADEP Comments on the Environmental Baseline Survey for Transfer (EBST)	29
MADEP Comments on Enclosure (1)	38
MADEP Comments on Enclosure (2)	38
SSTTDC General Comments	40
SSTTDC Comments on Enclosure (1)	42
Public Comments - Mike Bromberg of Rockland, MA	44

INTRODUCTION

This Responsiveness Summary contains the Department of the Navy's responses to comments that were received on the draft *Finding of Suitability to Transfer (FOST) for Seven Zoning Subparcels Designated INST-2, OS-C-3 and 4, SPUD-8 through 10, and the Trotter Road Extension (68.9 total acres) at the Former Naval Air Station (NAS) South Weymouth, Massachusetts* (the FOST) of 25 Jan 02.

The following comments were received during the public comment period that the Navy held from 28 Jan 02 to 26 Feb 02:

Letter to Dave Barney, Navy Caretaker Site Office (CSO), from Anne Malewicz, Massachusetts Department of Environmental Protection (MADEP) Bureau of Waste Site Cleanup, re: FOST, Seven Subparcels (INST-2 et al.), Former NAS South Weymouth, Release Tracking Number (RTN) 3-2621, letter dated 25 Feb 02.

Letter to Dave Barney, Navy CSO, from Kenneth Goff, South Shore Tri-Town Development Corporation (SSTTDC), re: SSTTDC Comments - Draft FOST for Zoning Subparcels INST-2, OS-C-3 and 4, SPUD 8 through 10, and the Trotter Road Extension (68.9 total acres) at the former NAS South Weymouth, Massachusetts, letter dated 25 Feb 02.

Letter to Dave Barney, Navy CSO, from Mike Bromberg, Rockland resident, re: Draft FOST Comments, letter dated 26 Feb 02.

Letter to Michele DiGregorio (DiGeambeardino), Navy Engineering Field Activity Northeast (EFANE), from Patty Marajh-Whittemore, U.S. Environmental Protection Agency (EPA) Region I, re: Review of Draft *FOST for Seven Zoning Subparcels Designated INST-2, OS-C-3 and 4, SPUD-8 through 10, and the Trotter Road Extension (68.9 total acres), at the former NAS South Weymouth, Massachusetts*, letter dated 27 Feb 02.

The Navy issued a draft Responsiveness Summary to the above comments in Aug 02 for regulatory review. The following additional comments were received on that draft document:

Letter to Michele DiGregorio (DiGeambeardino), Navy EFANE, from Patty Whittemore, EPA Region I, re: *Review of Navy's Responses to U.S. EPA Comments on the FOST for Seven Zoning Subparcels Designated INST-2, OS-C-3 and 4, SPUD-8 through 10, and the Trotter Road Extension (68.9 Total Acres) at the Former NAS South Weymouth, Massachusetts*, letter dated 6 Sep 01 [sic; actual date of 6 Sep 02].

The above comments, and the Navy's updated responses (Jan 03) are provided herein.

EPA GENERAL COMMENTS

1. The Navy states in Item 5 of the FOST memorandum that "[c]losure of the RIAs located within the FOST subparcels shall be completed prior to transfer of the property." EPA accepts this approach on the condition that "closure" of a Phase II Environmental Baseline Survey (EBS) Review Item Area (RIA) means Navy submittal and regulatory acceptance, prior to transfer, of a final No Further Action (NFA) decision document for the RIA.

Response: The FOST and its enclosures have been updated to indicate that the Navy and regulators have reached agreement on the closure of the RIAs located within the FOST subparcels.

2. With regard to RIAs that are in close proximity to one or more of the subparcels under consideration, Item 5 of the FOST memorandum states that "[t]here are no identified impacts to the subject subparcels of this FOST from the remaining RIAs located in other areas at NAS South Weymouth." At certain of the RIAs, however, environmental investigations are ongoing, with the result that the lack of *currently* identified impacts is not a sufficient basis for determining that a subparcel is suitable for transfer. The RIAs in question are (a) at OS-C-4: RIA 2B, RIA 2C, and RIA 97 and associated sites RIA 24, RIA 30B, and RIA 55B; (b) at SPUD-8: RIA 24, RIA 47, and RIA 78C; (c) at SPUD-9: RIA 30B; and (d) at SPUD-10: RIA 2C, RIA 30B, and RIA 34. It is premature for the Navy to define boundaries for these subparcels before it submits, and EPA accepts, the results of its investigation at the RIAs that are adjacent to or near them. The Navy has not determined either whether these RIAs will require no further action or action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or the Massachusetts Contingency Plan (MCP), or what extent of any contamination may be.

Response: After the draft FOST was issued, the Navy has since completed additional work and has obtained regulatory concurrence on NFA for each of the above cited EBS RIAs which are located within the FOST subparcels (i.e., RIAs 2B, 2C, 47, 78C, and 97). The FOST and its enclosures have been updated accordingly. The Navy's investigations are ongoing at the remaining RIAs cited above (i.e., RIAs 24, 30B, 34, and 55B) which are outside of, but nearby, the FOST subparcels.

Sufficient information is available regarding the nearby RIAs to find these areas suitable for transfer. FOST subparcel

boundaries are drawn with consideration for safe-distance "buffer zones" away from ongoing investigations. Larger buffer zones are provided where there is more uncertainty regarding a nearby investigation area.

The last two sentences of Item 5 of the FOST Memorandum has been modified to read as follows:

As summarized in enclosure (5), to the best of the Navy's knowledge, the conditions at nearby EBS RIAs (i.e., not included in this FOST) have not adversely impacted the subject subparcels. Investigations are ongoing at nearby RIAs; however, the currently available information does not indicate that there are potential impacts from these RIAs outside of their mapped areas, as depicted in the figures of enclosure (1).

RIA 55B (debris north of Trotter Road, now designated Area of Concern [AOC] 55B) is separated from subparcel OS-C-4 and the other FOST subparcels by French Stream. Subparcel OS-C-4 exhibits none of the debris areas identified as being of concern at AOC 55B. There is no indication that potential chemicals of concern (COCs) from debris areas at AOC 55B, if present, would have migrated across the stream to impact subparcel OS-C-4. Samples from AOC 55B have not shown impacts to groundwater or French Stream. Unacceptable risks to human health have not been identified for the site. Low ecological risks are associated with the wetland in the northwest portion of AOC 55B (this area is now designated AOC 55D, which is not located nearby the FOST subparcels). Therefore, AOC 55B/D does not adversely affect the FOST.

See below regarding the updated responses for RIAs 24, 34, and 30B.

EPA Follow-Up Comment of 6 Sep 02: It is agreed that, in general, NFA is anticipated for the sites in question; however, site review is not complete in all cases:

- RIA 24 (Ordnance Shop, Building 50): It is noted that NFA is pending regulator review of the Septic System Report.
- RIA 34 (Marine Hot Refueler Area): Until results on the resampled monitoring wells and one surface soil sample are reviewed, it is premature to say, "NFA is likely". The report should indicate, as has been stated for other sites (e.g., RIA 2C), that completion of a final Decision Document and NFA concurrence with regulators will precede transfer of SPUD-10.

Response: At RIA 24 (Building 50 oil/water separator), the Navy has completed a Various Removal Action to address the oil/water separator and its associated piping, floor drains, etc. Based on the results of confirmatory samples, the Navy plans NFA for RIA 24 and was working to resolve regulatory comments and issues associated with the septic leach field. Test pits were excavated and additional samples were collected in Nov 02. A note has been added to enclosure (5) indicating that the Navy's NFA decision is pending regulatory concurrence on the septic system report and revised Decision Document. Pending concurrence does not adversely affect the FOST because RIA 24 is located outside of the FOST parcels and no impacts to the adjacent FOST parcel have been identified.

The Navy believes that groundwater in the area of RIA 34 (Marine hot refueler area) flows south/southwest, which is away from the SPUD-10 property to the northwest. The entry for RIA 34 in Enclosure (5) has been modified to indicate this groundwater flow direction. The Navy has also recently conducted additional sampling to confirm that NFA is appropriate, as previously recommended. This additional sampling round indicated that groundwater at RIA 34 is not a concern. A preliminary evaluation of the validated groundwater sample results were non-detect for the target constituents except for a trace concentration of Extractable Petroleum Hydrocarbons (below screening criteria) in one well. These recent results will be provided for regulatory review in a Decision Document. Given that NFA is likely, the site is outside of the FOST subparcel, and the subparcel is not downgradient of the site, RIA 34 does not adversely affect the FOST.

EPA Follow-Up Comment of 6 Sep 02 (also applies to EPA Specific Comments 3g, 5a, and 6b): The investigation at RIA 30B (now AOC 30B - Hangar 2 - Spills Off Edge of Apron) is on-going. The extent of contamination in all site media has not been fully evaluated. The site is in fairly close proximity to OS-C-4, SPUD 9, and SPUD 10. Regarding OS-C-4, the Navy has provided a valid argument against the likelihood of surface flow to the subparcel. Further, given that the inferred groundwater flow in the area is to the southwest, it is agreed that any potential contaminated groundwater at AOC 30B would not be likely to migrate to the subparcel. Similarly, surface flow to SPUD 9 is unlikely and it is agreed that the subparcel is hydrogeologically upgradient from 30B. Therefore, suitability of transfer of subparcels OS-C-4 and SPUD 9 should not be affected by AOC 30B. The argument for

SPUD 10 is not as compelling, however. Although most of SPUD 10 is located more than 40' away from AOC 30B, EPA's concerns for migration to the most proximal area stands. Further, as SPUD 10 is immediately downgradient of AOC 30B, the potential for groundwater impacts must be elucidated prior to property transfer. It is recommended that this issue be discussed during the next EBS meeting.

Response: RIA 30B (spills off Hangar 2 apron) is now designated as CERCLA AOC 30B. Based on the available information and sampling data, potential impacts at AOC 30B are limited to the drainage ditch along the apron's west edge. The Navy is addressing AOC 30B as part of the work for AOC 61 (Tactical Air Navigation [TACAN] Outfall). Available data also indicate that groundwater flow in the AOC 30B/IR Program Site 10 area is predominantly to the south-southwest, and is therefore unlikely to flow directly toward subparcel SPUD-10. Furthermore, no adverse impacts to groundwater from AOC 30B are anticipated because sampling data indicated that there are only low concentrations of chemicals in soil, sediment, and surface water that are not be expected to significantly affect groundwater quality.

However, the Navy concurs that further characterization of groundwater flow direction is required at IR Program Site 10. Therefore, as a conservative measure, clause 8(a) of enclosure (2) has been modified to prevent the use of groundwater in the subparcels southwest and adjacent to Hangar 2 (IR Program Site 10 and AOC 30B) until the Navy demonstrates that the conditions at Hangar 2 pose no unacceptable risks to human health or the environment in those subparcels. The restriction would also require slab-on-grade construction and air monitoring for volatile organic compounds (VOCs) at new construction sites in subparcel SPUD-10 to ensure that groundwater conditions at the adjacent investigation site pose no unacceptable risk due to volatilization of VOCs into buildings. The restriction can be lifted at such time that the characterization of IR Program Site 10 allows.

3. The restriction on groundwater extraction that applies to certain of the subparcels will lessen potential risk to human health; however, this restriction does not address the potential risk of volatilization of VOCs into buildings that may be erected on a subparcel (e.g., the potential impacts of VOC-contaminated groundwater from the Building 81 site on SPUD-9). It is premature for the Navy to define boundaries for these subparcels before it submits, and EPA accepts, final

Remedial Investigation Reports for the Installation Restoration Program (IR Program) sites that are adjacent to or near them. The Navy has not determined either whether these sites will require action under CERCLA, or what the extent of any contamination may be.

Response: Based on the currently available information for Site 9 (e.g., as summarized in the Remedial Investigation Work Plan of May 02), subparcel SPUD-9 is hydrogeologically cross-gradient from Site 9 (i.e., impacted groundwater from Site 9 is unlikely to migrate onto subparcel SPUD-9). Also, in the closest Site 9 monitoring wells to subparcel SPUD-9, the detected concentrations were not indicative of potential volatilization hazards. In the two closest wells (MW-32S and MW-33S), approximately 100 mg/L of total chlorinated volatile organic compounds (CVOCs) were detected in the overburden groundwater and only trace concentrations of CVOCs (maximum of 3.8 mg/L) were detected in bedrock groundwater from the recent pilot study data. Benzene, toluene, ethylbenzene, and total xylene (BTEX) compounds were non-detect or trace (maximum of 2.1 mg/L) in overburden and bedrock groundwater samples from these two wells. As a comparison, the MCP GW-2 standards, which are based on potential risks from volatilization from groundwater to indoor air, cites a criterion of 3,000 mg/L for one of the CVOCs at Site 9, tetrachloroethene. Another typical CVOC, trichloroethene, has a GW-2 standard of 300 mg/L. Therefore, it does not appear that subparcel SPUD-9 has significant risks from volatilization of Site 9 COCs. The FOST notes that the Navy reserves the right to access transferred property as needed to support future environmental investigations such as those at Site 9.

Due to pending investigations at IR Program Site 10, clause 8(a) of enclosure (2) includes a requirement for slab-on-grade construction and air monitoring for VOCs at new construction sites in subparcel SPUD-10 to ensure that groundwater conditions at the adjacent investigation site pose no unacceptable risk due to volatilization of VOCs into buildings. The restriction can be lifted at such time that the characterization of IR Program Site 10 allows.

4. The Navy should provide figures, which clearly show groundwater and surface water flow patterns both on and between each of the subparcels and the IR Program sites, MCP sites and RIAs. The figures should show surface water drainage features such as ditches, trenches and any surface water bodies, and should be at a scale that allows a quick

determination of whether surface water or groundwater would be expected to flow from the environmental sites onto the subparcel. In addition, each of the figures in the EBST depicting the subparcels show topographic contours, but these contours are not labeled with elevations. Please revise the figures to include elevations.

Response: The existing figures in enclosure (1) have been modified to include these details.

5. From Figure 4 of the EBST, it would appear that the Navy established the boundaries of OS-C-4 by allowing for a 100'-200' buffer zone between the subparcel and the Abandoned Bladder Tank Fuel Storage Area (ABTFSA) Site. If this is the case, explain why the Navy is allowing for a 100'-200' buffer zone between subparcel OS-C-4 and the ABTFSA site, which showed no unacceptable risks per the Draft Final Phase II Remedial Investigation Report, whereas no such buffer zone exists between OS-C-4 and the Sewage Treatment Plant (STP) site or the West Gate Landfill site, both of which showed unacceptable human health risks for certain scenarios.

Response: At Site 7 (Sewage Treatment Plant), the potential human health risks are primarily associated with pesticides in surface soil/sediment. Such constituents are generally immobile and, as such, would not be anticipated to migrate onto a nearby FOST subparcel. Although a slight human health risk was also indicated for a hypothetical future resident consuming arsenic in groundwater, there are several mitigating factors that indicate the adjacent property remains suitable to transfer:

- The final Phase II Remedial Investigation (Apr 02) indicates that the risk calculation may be slightly misleading, as the arsenic is mostly attributable to suspended solids within the groundwater.
- The draft final Feasibility Study for Site 7 (Dec 02) indicated that remediation of arsenic in groundwater is not warranted.
- The approved zoning would not allow for residential use of either the Site 7 property or the FOST property. Therefore, the conservative risk assessment scenario will not occur.
- Arsenic was only detected in one Site 7 well (at 5.7 mg/L in MW-57, which is located at the western tip of Site 7). On the downgradient (southwest) side of that well, the FOST subparcel is several hundred feet away.

- The location of the arsenic detection in groundwater is outside of the MassGIS-mapped potentially productive medium-yield aquifer at Site 7.
- Given that there are no potential high-yield aquifers around Site 7, there is no planned or anticipated future use of groundwater at or immediately adjacent to Site 7.

Regarding Site 1 (West Gate Landfill), the potential human health risks are associated with either surface soil (unlikely to migrate across French Stream to the FOST subparcels) or from a hypothetical future resident consuming groundwater from the site. This has no bearing on a nearby FOST subparcel, which cannot be used for residential purposes in accordance with the approved zoning. Potential ecological risks identified at Site 1 pertain to COCs in surface soil (unlikely to migrate across French Stream to the FOST subparcels). Therefore, the location of Site 1 does not adversely affect the FOST of the nearby subparcels.

The Navy, EPA, and MADEP have agreed to the final Proposed Plan (Oct 02) for No Action at Site 8 (Abandoned Bladder Tank Fuel Storage Area). The Navy is currently preparing the No Action Record of Decision. Therefore, the buffer zone between subparcel OS-C-4 and Site 8 has been reduced. Technically, Site 8 poses no unacceptable risks to human health or the environment. However, Site 8 is not included in this FOST because, administratively, the Record of Decision still must be completed for Site 8 before the official closure of that operable unit.

EPA SPECIFIC COMMENTS ON THE MEMORANDUM FOR THE RECORD

1. Page 3, Item 2. "Comprehensive Environmental Response and Facilitation Act" should be "Community Environmental Response Facilitation Act."

Response: The text has been corrected.

2. Page 4, Item 6. "Hazardous materials and petroleum products" should be "hazardous substances and petroleum products."

Response: The text has been corrected.

3. Page 4, Item 7. The phrase "shall be made available" is confusing, given that Item 8 states that the FOST and its enclosures shall be included in and made part of the deed, and shall be included in future property transfer or lease document packages. Required inclusion is different from a

required offer of access if requested. Please revise Item 7 to reflect that the FOST and its enclosures shall be included in and made a part of the deed, and shall be included in future property transfer or lease document packages.

Response: Item 7 of the FOST Memorandum has been modified to read as follows:

In accordance with the Federal Facility Agreement (FFA) for the NAS South Weymouth NPL site, this document, including enclosures (1) through (8), shall be made a part of the deed and any transfer documents or future leases entered into with any other party for the subject subparcels...

EPA SPECIFIC COMMENTS ON ENCLOSURE (1)

1. Page 1, ¶ 1. "Hazardous materials or petroleum products" should be "hazardous substances or petroleum products."

Response: The text has been corrected.

2. Page 5, INST-2. The only site of environmental concern on or within 200 ft of this subparcel is the former MCP site RTN 3-13673. According to Table 1 of Enclosure (1), this MCP site had been closed "through a Class A-1 Response Action Outcome (RAO)." As such, there appear to be no issues with the proposed transfer of this subparcel.

Response: The text has been clarified here, and for other subparcels as appropriate, to indicate that there are no outstanding environmental issues with the proposed transfer of this subparcel.

3. Pages 6-9, OS-C-4:

- a. According to Page 7, 1st bullet, and Page 2 of the table in Enclosure (4), the subparcel contains an MCP site (RTN 3-10858) that has undergone a substantial amount of remediation over the past ten years. The Navy has indicated that a draft RAO is being prepared. The Navy should confer with the MADEP about the site to ensure it has been adequately addressed before OS-C-4 is transferred.

Response: The Navy completed a final Class A-2 RAO for the Fuel Farm site (RTN 3-10858) in Feb 02. Therefore, the Navy has met the State's requirements for addressing this former site prior to transfer. See also the responses to MADEP's specific comments pertaining to the Fuel Farm site.

- b. Figure 4 shows the boundary of OS-C-4. A few issues are unclear: (1) Part of the boundary is dashed, and it is unclear what the meaning of this dashed line is. Please clarify. (2) The position of MCP Site RTN 3-10858 (also identified as RIA 25) is unclear. From Figures 4 and 5 of the EBST, it appears that this site is located within SPUD-8 and not OS-C-4. Please clarify the location of this site. (3) OS-C-4 appears to contain part of Building 103. According to Page 6 of the EBST, the only building contained in the subparcel is Building 90/3. Please clarify this apparent discrepancy.

Response: The dashed lines were intended to indicate where the environmental sites crossed subparcel boundaries. To clarify the figures, the dashed lines have been made solid.

The shape of the site boundary on Figures 4 and 5 show that MCP RTN 3-10858 is located in both subparcels OS-C-4 and SPUD-8. To clarify, the labeling on Figures 4 and 5 has been modified.

The majority of Building 103 is located in subparcel SPUD-9 and its description was provided along with that subparcel. To clarify, the text for subparcel OS-C-4 has been modified to state that a portion of Building 103 is located in that subparcel. The text also has been modified to indicate that the presence of a corner of Building 103 in subparcel OS-C-4 does not adversely affect the suitability to transfer of that subparcel. However, for further details of Building 103, the reader will be referenced to the text for subparcel SPUD-9.

- c. RIA 2B is within OS-C-4 and requires further investigation. At this point, it is unclear that groundwater was adequately addressed as a part of the initial Phase II EBS investigation. In addition, metals have not yet been evaluated, and soil samples are to be recollected for organics analysis at an off-site laboratory. Any additional samples taken to "confirm the conditions" at RIA 2B must be shown not to exceed benchmarks, and OS-C-4 should not be transferred until this RIA has been fully evaluated and there is final regulatory concurrence on an NFA decision.

Response: In Jan 02, the Navy completed a Limited Removal Action at RIA 2B (north end of Runway 17-35) in accordance with the MCP to address polycyclic aromatic hydrocarbons

(PAHs) and lead concentrations in soil. The Navy's Remedial Action Contractor issued the closure report in May 02 (see the "CTO 48-21" compact disk). The Navy has since obtained regulatory concurrence on NFA for RIA 2B; therefore, it is suitable to transfer.

- d. RIA 2C is within OS-C-4 and has outstanding issues with regard to herbicides. Specifically, an evaluation of the potential risk associated with suspected historic Pramitol applications at the site is slated. If the Navy cannot demonstrate, based on half-life, estimated applications concentrations, etc., that Pramitol current concentrations in soil could not exceed the RBC, further action will be required at the site. Therefore, transfer is inappropriate at this time.

Response: The Navy issued a revised NFA Decision Document for RIA 2C (herbicide use around runway lighting) in May 02 and has obtained regulatory concurrence. Therefore, RIA 2C is suitable to transfer.

- e. RIA 97 consists of a number of sites that have since been identified as separate RIAs. Some of these sites are located on OS-C-4. The Navy has indicated that it will wait for regulatory concurrence on a NFA decision for RIA 97 prior to transferring OS-C-4. This approach is acceptable; however, the status of each RIA generated from RIA 97 may need to be addressed separately.

Response: RIA 97 (fire department spill response records) was a temporary RIA designation that has since been addressed/tracked under specific, separate RIAs. As documented in a letter effective 18 Jan 02, the Navy, EPA, and MADEP have agreed that NFA is required for RIA 97.

- f. RIA 24 is within 50 ft of OS-C-4. As a result of the removal action performed to remove the floor drain system and oil water separator, there do not appear to be any impacts to OS-C-4; however, the data in the report were not validated (or at least not indicated as such). Consequently, it is not possible to evaluate the RIA with a sufficient degree of certainty. In addition, Page 3 of the table in Enclosure (5) indicates that "a drainage ditch that may have received discharge from the oil/water separator may be addressed as part of the removal action for the Tacan site, if necessary." It is unclear where the drainage ditch is in relation to OS-C-4 and what information is available regarding potential contamination

associated with the ditch. Until these issues are resolved, OS-C-4 should not be transferred.

Response: As noted in the Response to EPA General Comment No. 2, the Navy has completed a Various Removal Action at RIA 24 and anticipates that NFA is required. Data validation is unlikely to change the understanding of the conditions at RIA 24 and the NFA recommendation that follows. Foster Wheeler chemists performed data quality evaluations that met substantive requirements of the EPA Tier II data validation. During the property transfer process, the Navy will reserve the right to return to the site to address any currently unidentified environmental concerns that relate to past Navy activities. The status of this nearby site should not hold up the transfer of the nearby portion of subparcel OS-C-4 and certainly not the remainder of subparcel OS-C-4, the western portion of which is located up to 2,000 ft away from RIA 24.

The oil/water separator at Building 50 did not discharge to a ditch. The cited section in Enclosure (5) has been corrected. Building 50 floor drains led to the oil/water separator, which discharged to a septic tank and leach field, installed in 1978 south/southeast of the building (outside of the FOST subparcels). After 1989, the septic tank was abandoned and the sanitary wastewater from Building 50 was instead sent to a sanitary sewer force main. The Navy cleaned out the septic tank in Jun 99. Additional sampling and test pits were conducted in the area during Nov 02. The data are expected to confirm that NFA is required. There is no identified potential for impacts to a FOST subparcel from this nearby site.

- g. RIA 30B is within 40 ft of OS-C-4. While there is no direct evidence if impacts to this subparcel, there is still a fair amount of uncertainty associated with 30B. The Navy must collect and analyze additional soil samples, and the list of analytical parameters needs to be expanded to include complete Target Compound List (TCL) and Target Analyte List (TAL) parameters; the sediment from a nearby drainage ditch had PAH and polychlorinated biphenyl (PCB) concentrations that exceed ecological benchmarks; groundwater has not been sufficiently evaluated; and the RIA decision document did not provide a sufficient description of groundwater flow at the RIA. In sum, further investigation is necessary, and the transfer of OS-C-4 should not take place until there is final regulatory concurrence on an NFA decision. In the alternative, OS-C-4

should not be transferred until the Navy demonstrates that the buffer zone between the subparcel and RIA 30B is adequate given the uncertainties associated with RIA 30B.

Response: Figure 4 shows that only a small portion of subparcel OS-C-4 is near AOC 30B. The 40-ft distance cited is the distance of the closest points between the subparcel and AOC 30B. The remainder of the subparcel is up to 1,450 ft away from AOC 30B. Therefore, at most, only a small portion of the subparcel should be questioned with regards to AOC 30B. AOC 30B is located outside of subparcel OS-C-4; therefore, EPA's concerns pertain to the potential migration of COCs from AOC 30B onto property within subparcel OS-C-4. There is no indication that the conditions at AOC 30B have/will adversely affect subparcel OS-C-4.

- As shown in Figure 4, the portion of subparcel OS-C-4 that is 40 ft from AOC 30B is located along the taxiway. The taxiway has been designated "CERFA-1 clean" (ECP Category 1).
- The runways and taxiways are topographically higher than the surrounding area. Therefore, surface water and soil from AOC 30B would not be expected to migrate onto or across the taxiway and into subparcel OS-C-4.
- The existing data for AOC 30B do not suggest the presence of site-related COCs outside of the mapped extent. COCs were identified within the drainage ditch around the runway apron (outside of the FOST subparcel).
- Due to the types of COCs and their reported low concentrations at AOC 30B, it is unlikely that COCs have adversely impacted groundwater.
- Groundwater at AOC 30B flows south-southwestward. Therefore, subparcel OS-C-4 is hydrogeologically upgradient/cross-gradient from AOC 30B and would not be affected by site groundwater.
- The COCs at AOC 30B are located in the drainage ditch, which is part of the planned AOC, 61 (TACAN) removal action. Concerns regarding potential impacts to subparcel OS-C-4 from the conditions at AOC 30B will be further mitigated.

Therefore, the conditions at AOC 30B do not change the FOST for subparcel OS-C-4.

- h. RIA 55B is located close to the western boundary of OS-C-4. The RIA is undergoing further investigation, and the Navy

had indicated that it is preparing a human health risk assessment (HHRA) and an ecological risk assessment (Page 12 of the table in Enclosure [5]). Based on the amount of uncertainty associated with this RIA and the proximity of the RIA to the subparcel, the Navy should not transfer this subparcel until RIA 55B is better understood and environmental issues have been resolved to the satisfaction of the Navy and the EPA.

Response: RIA 55B (debris north of Trotter Road) is now designated CERCLA AOC 55B. AOC 55B is located on the opposite side of French Stream from the subparcel. The identified solid waste debris that is a suspected source for AOC 55B is not present east of French Stream in subparcel OS-C-4. In addition, samples from French Stream in support of the AOC 55B investigation did not indicate the migration of COCs onto property within subparcel OS-C-4. No unacceptable risks to human health have been identified for the site. Low ecological risks are associated with the wetland in the northwest portion of AOC 55B, now designated AOC 55D (and not located nearby the FOST subparcels). Therefore, AOC 55B does not adversely affect the FOST. There are no plans to expand the AOC 55B investigation east of French Stream. Therefore, the western edge of subparcel OS-C-4 along French Stream is suitable to transfer. The remainder of subparcel OS-C-4 is located up to 2,500 ft away from AOC 55B and, by extension, is also unaffected by AOC 55B.

- i. According to Page 2 of Enclosure (3), OS-C-4 abuts the STP site. EPA acknowledges that the unacceptable risk to human health at the STP site is based on exposure scenarios that are not currently relevant to OS-C-4, as this subparcel is not zoned for residential or recreational uses; however, the potential that contaminated groundwater could migrate beneath the subparcel, primarily in the northeastern section of the subparcel, cannot be ruled out based on groundwater flow direction. Please address.

Response: As documented in the final Phase II Remedial Investigation for Site 7, the former STP, potential excess human health risks associated with groundwater pertained to a hypothetical future residential scenario in which site groundwater was used as a drinking water source. The COC associated with the slightly elevated risk was arsenic. However, as documented in the final Phase II Remedial Investigation of Apr 02, the single detected concentration of arsenic in groundwater (1 out of 10 samples) was likely

associated with suspended solids within the groundwater sample.

The single detected concentration of arsenic (5.7 mg/L) was not detected in a duplicate sample. Also, that detected concentration is lower than not only the current primary federal drinking water Maximum Contaminant Level (MCL) of 50 mg/L, but also the pending 10 mg/L MCL to be implemented for arsenic in 2006.

Finally, the location of the detected arsenic concentration is in MW-57D, which is located at the western tip of the mapped extent of Site 7. Groundwater at Site 7 flows southwest; therefore, groundwater at MW-57 does not flow directly onto a FOST subparcel (the FOST subparcel is several hundred feet downgradient of that well location).

Therefore, the condition of groundwater at Site 7 does not adversely affect the FOST.

- j. OS-C-4 is 45 ft east of WGL site. The baseline HHRA performed at the WGL site indicated that the human health risks associated with each exposure scenario considered exceeded the acceptable regulatory risk range. These risks were due to arsenic, chromium, and dibenz(a,h)anthracene in groundwater and lead and PCBs in surface soil. Given the risk associated with the WGL site, and its proximity to OS-C-4, the Navy should consider the use of physical access restrictions, such as a fence that extends down the east side of French Stream between the western boundaries of subparcels OS-C-4 and SPUD-10 and the WGL to the north of the WGL south of Trotter Road, and along the western and southern boundaries of the WGL, totally surrounding the site.

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 the West Gate Landfill with respect to the future development of the abutting transferred property. Currently, warning signs are in place around the West Gate Landfill, and there is no need for fencing because there is no unauthorized access to abutting property. If, during the redevelopment of adjacent areas, there is an unacceptable potential for people to access the West Gate Landfill site, then the Navy will, at that time, consider the appropriate specific access control measures. The

pending Record of Decision for the West Gate Landfill will establish the final remedy to be implemented for the protection of human health and the environment.

- k. OS-C-4 is about 100 ft from the ABTFSA site. The Draft Final Phase II Report for that site shows no unacceptable human health risks associated with the site but ecological issues still remain. Until the Navy issues and accepts the Final Remedial Investigation Report for the ABTFSA site (and in particular until the EPA specifically accepts the proposed revisions to the sediment toxicity evaluation), transfer of this subparcel is premature.

Response: This comment was submitted to the Navy in Feb 02. The Navy has since finalized the Phase II Remedial Investigation for Site 8 (Abandoned Bladder Tank Fuel Storage Area) in Mar 02. Therefore, the conditions of this comment have been satisfied.

As documented in the final Remedial Investigation, the ecological risk assessment only identified minimal potential risks to invertebrates within the drainage channel located along the south and east sides of the site. No potential impacts to other areas have been identified. The Navy, EPA, and MADEP have agreed to the final No Action Proposed Plan (Oct 02) for Site 8. Therefore, Site 8 does not adversely affect the FOST of subparcel OS-C-4.

4. Pages 9-12, SPUD-8

- a. RIA 24 is within 200 ft of SPUD-8. As a result of the removal action performed to remove the floor drain system and oil/water separator there do not appear to be any impacts on SPUD-8; however, the data in the report were not validated (or at least not indicated as such). Consequently, it is not possible to evaluate the RIA with a sufficient degree of certainty. In addition, Page 3 of the table in Enclosure (5) indicates that "a drainage ditch that may have received discharge from the oil/water separator may be addressed as part of the removal action for the Tacan site, if necessary." It is unclear where the drainage ditch is in relation to SPUD-8 and what information is available regarding potential contamination associated with the ditch. Until these issues are resolved, SPUD-8 should not be transferred.

Response: See the Response to EPA's General Comment No. 2 and the Response to EPA's Specific Comment No. 3(f). The

status of this nearby site does not adversely affect subparcel SPUD-8. Data validation is unlikely to change the understanding of the conditions at RIA 24 and the NFA recommendation that follows. Also, the FOST has been corrected in that the oil/water separator did not discharge to a ditch. The Navy will complete a final closeout report for the septic system.

- b. EBS RIA 25 is located with SPUD-8. This RIA has been transferred to the MCP program (RTN 3-10858). The site is still active, and the Navy should confer with MADEP to ensure that it had been adequately addressed before the OS-C-4 considered for transfer.

Response: The Navy completed a final Class A-2 RAO for the Fuel Farm site (RTN 3-10858) in Feb 02. Therefore, the Navy has met the State's requirements for addressing this former site prior to transfer. See also the responses to MADEP's specific comments pertaining to the Fuel Farm site.

- c. RIA 47, located on subparcel SPUD-8, is related to hydraulic lifts that were formerly used at Building 102. The lifts were removed, and the subsurface soil samples were collected and analyzed to determine whether the lifts or associated piping may have leaked hydraulic fluid. The decision document for the site appears to show that the analytical data were not validated. Based on recent discussions between the Navy, EPA and MADEP, this site is moving towards NFA pending validation of the analytical data collected as part of the Phase II EBS. The subparcel should not be transferred until there is final regulatory concurrence of an NFA decision.

Response: The Navy issued a revised NFA Decision Document for RIA 47 in Aug 02, additional responses to regulatory comments in Dec 02, and has obtained regulatory concurrence on NFA. Therefore, RIA 47 is suitable to transfer.

- d. Figure 5 of the EBST shows SPUD-8 and the surrounding area. The line delineating the subparcel is partially dashed. It is unclear what the dashed line is supposed to represent. Please clarify.

Response: The dashed lines were intended to indicate where the environmental sites crossed subparcel boundaries. To clarify the figures, the dashed lines have been made solid.

- e. RIA 78C partially overlaps SPUD-8. This RIA consists of an undocumented underground storage tank (UST) removal near Building 102. The Navy has proposed adding a soil boring and monitoring well to address apparent deficiencies in sample placement during the Phase II EBS investigation at the site. The Navy should not transfer SPUD-8 until the investigation at RIA 78C is complete and there is final regulatory concurrence of an NFA decision.

Response: The Navy completed the final NFA Decision Document for RIA 78C in Jun 02 and has obtained regulator concurrence. Therefore, RIA 78C is suitable to transfer.

- f. According to Page 2 of Enclosure (3), the STP site is 50-ft northeast of SPUD-8. EPA acknowledges that the unacceptable risk to human health at the STP site is based on exposure scenarios that are not currently relevant to OS-C-4, as this subparcel is not zoned for residential or recreational uses. EPA also acknowledges that the subparcel is hydrogeologically cross-gradient of the STP. Therefore, it appears that IR Program Site 7 should not restrict transfer of SPUD-8. This is contingent, however, on necessary access restrictions for the IR Program Site.

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 IR Program Site 7 (Sewage Treatment Plant) with respect to the future development of the abutting transferred property. The final Phase II Remedial Investigation for Site 7 indicated that there are no unacceptable risks for trespassers onto Site 7. However, warning signs are currently in place at Site 7 to prevent access. If, during the redevelopment of adjacent areas, there is an unacceptable potential for people to access Site 7, then the Navy will, at that time, consider the appropriate specific access control measures. The pending Record of Decision for Site 7 will establish the final remedy to be implemented for the protection of human health and the environment.

5. Pages 12-15, SPUD-9

- a. EBS RIA 30B is about 100 ft from the SPUD-9 based on Figure 6 of the EBST. While there is no direct evidence of impacts to this subparcel, there is still a fair amount of uncertainty associated with RIA 30B. The Navy must collect

and analyze additional soil samples, and the list of analytical parameters needs to be expanded to include complete TCL and TAL parameters; the sediment from a nearby drainage ditch had PAH and PCB concentrations that exceed ecological benchmarks; groundwater has not been sufficiently evaluated; and the RIA decision document did not provide a sufficient description of groundwater flow at the RIA. In sum, further investigation is necessary, and the transfer of SPUD-9 should not take place until there is final regulatory concurrence on an NFA decision. In the alternative, SPUD-9 should not be transferred until the Navy demonstrates that the buffer zone between the subparcel and RIA 30B is adequate given the uncertainties associated with RIA 30B.

Response: Potential COCs in soil or contained within ditch sediment are not expected to migrate to subparcel SPUD-9 property. Detailed groundwater flow investigations have been completed at nearby IR Program Site 8 (Abandoned Bladder Tank Fuel Storage Area) to the north of AOC 30B and are ongoing at IR Program Site 9 (Building 81) east of RIA 30. These two IR Program sites are likely to provide a good model of groundwater flow in the west area of subparcel SPUD-9 (see Figure 6). Groundwater at Sites 8 and 9 was found to flow south and west/southwest, respectively. Similarly, groundwater flow at the former Fuel Farm site (RTN 3-10858) was found to flow south/southwest. Based on the surrounding flow patterns, subparcel SPUD-9 appears to be upgradient of AOC 30B. Therefore, the uncertainties at AOC 30B do not adversely affect the FOST for subparcel SPUD-9.

- b. SPUD-9 is 20 ft from the Building 81 Site. The Building 81 site has bedrock groundwater that has been impacted with chlorinated solvents. 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 close proximity to an AOC for which the Navy has not yet completed the CERCLA RI and determined the full extent of the contamination.

Response: See the Response to EPA General Comment No. 3. In addition, the impacts at Site 9 are primarily located in bedrock groundwater. Therefore, although an HHRA has not yet been conducted for this site, any potential risks to human health are likely to be related to consumption of impacted groundwater and not to uses of subparcel SPUD-9 allowed under the zoning. Clause 8(a) of enclosure (2)

disallows groundwater use in SPUD-9 until Site 9 has been addressed. Further, subparcel SPUD-9 is located cross-gradient of the Building 81 site; therefore, groundwater impacts at Site 9 are less likely to extend into subparcel SPUD-9. To date, no groundwater impacts from Site 9 have been detected within subparcel SPUD-9. As part of the property transfer process, the Navy will reserve the right to access transferred property to conduct investigations or remedial actions for Site 9.

6. Pages 15-16, SPUD-10.

- a. RIA 2C partially overlaps SPUD-10. This RIA has outstanding issues with regard to herbicides. Specifically, an evaluation of the potential risk associated with suspected historic Pramitol applications at the site is slated. If the Navy cannot demonstrate, based on half-life, estimated application concentrations, etc., that Pramitol current concentrations in soil could not exceed the RBC, further action will be required at the site. Therefore, transfer is inappropriate at this time.

Response: The Navy issued the NFA Decision Document for RIA 2C (herbicide use around runway lighting) in May 02 and has obtained regulatory concurrence. Therefore, RIA 2C is suitable to transfer.

- b. According to Page 6 of Enclosure (5), RIA 30B is 40 ft east of subparcel SPUD-10. While there is no direct evidence of impacts to this subparcel, there is still a fair amount of uncertainty associated with RIA 30B. The Navy must collect and analyze additional soil samples, and the list of analytical parameters needs to be expanded to include complete TCL and TAL parameters; the sediment from a nearby drainage ditch had PAH and PCB concentrations that exceed ecological benchmarks; groundwater has not been sufficiently evaluated; and the RIA decision document did not provide a sufficient description of groundwater flow at the RIA. In sum, further investigation is necessary, and the transfer of SPUD-10 should not take place until there is final regulatory concurrence on an NFA decision. In the alternative, SPUD-10 should not be transferred until the Navy demonstrates that the buffer zone between the subparcel and RIA 30B is adequate given the uncertainties associated with RIA 30B.

Response: Figure 7 shows that only the eastern portion of subparcel SPUD-10 is near AOC 30B. The remainder of the

subparcel is up to 1,200 ft away from AOC 30B. Therefore, at most, only the eastern portion of the subparcel should be questioned with regards to AOC 30B. AOC 30B is located outside of subparcel SPUD-10; therefore, EPA's concerns pertain to the potential migration of COCs from AOC 30B onto property within subparcel SPUD-10. There is no indication that the conditions at AOC 30B have/will adversely affect subparcel SPUD-10.

- As shown in Figure 7, the portion of the subparcel that is near AOC 30B is located along the taxiway. The taxiway has been designated "CERFA-1 clean" (ECP Category 1).
- The runways and taxiways are topographically higher than the surrounding area. Therefore, surface water and soil from AOC 30B would not be expected to migrate onto or across the taxiway and into subparcel SPUD-10.
- The existing data for AOC 30B do not suggest the presence of site-related COCs outside of the mapped extent. COCs were identified within the drainage ditch around the runway apron (outside of the FOST subparcel).
- Due to the types of COCs and their reported low concentrations at AOC 30B, it is unlikely that COCs have adversely impacted groundwater.
- The COCs at AOC 30B are located in the drainage ditch that is planned to be part of AOC 61 (TACAN) removal action. Concerns regarding potential impacts to subparcel SPUD-10 from the conditions at AOC 30B will be further mitigated.

See the Response to EPA General Comment No. 2 regarding potential impacts to groundwater from IR Program Site 10. As noted therein, available information from previous investigations suggests that groundwater from the AOC 30B/IR Program Site 10 area flows in a south-southwesterly direction. However, the Navy concurs that further characterization of groundwater flow direction is required at IR Program Site 10. Therefore, as a conservative measure, clause 8(a) of enclosure (2) has been modified to prevent the use of groundwater in the subparcels southwest and adjacent to Hangar 2 (IR Program Site 10 and AOC 30B) until the Navy demonstrates that the conditions at Hangar 2 pose no unacceptable risks to human health or the environment in those subparcels. The restriction would also require slab-on-grade construction and air monitoring for VOCs at new construction sites in subparcel SPUD-10 to ensure that the adjacent site poses no

unacceptable risk due to volatilization of VOCs into buildings. The restriction can be lifted at such time that the characterization of IR Program Site 10 allows.

- c. Page 7 of Enclosure (5) indicates that RIA 34 is 65 ft southeast of SPUD-10. The Phase II EBS investigation at RIA 34 did not reveal any exceedances of the human health benchmarks. Based on the rejection of some groundwater data (VOCs and EDB), resampling of the groundwater at this RIA has been proposed. It is noted that groundwater flow (according to the decision document) is to the southeast away from the subparcel. It is unclear, however, how surface water flows on the RIA and whether surface water flow could impact subparcel SPUD-10. Further, additional surface soil sampling has been proposed in order to more fully characterize the site, specifically to determine whether the ecological exceedance of chromium was limited to one sample location or more widespread. Therefore, until the Navy, EPA and MADEP agree to NFA for the site, based on the results on samples collected in the most recent Work Plan (November 2001), or until the Navy provides data sufficient to rule out the possibility of contaminant migration from RIA 34 to SPUD-10, the property should not be transferred.

Response: Surface water from RIA 34 would not be expected to cross the taxiway and flow onto subparcel SPUD-10 property. As part of their design, the runways and taxiways are topographically higher than the surrounding land (surface water runoff control). Similarly, the railroad spur that runs through RIA 34 is topographically higher than the surrounding area. Also, there is a stormwater catch basin adjacent to the railroad spur that further prevents surface water flow onto subparcel SPUD-10. Finally, the surface cover at RIA 34 contains a lot of gravel, which would tend to cause surface water to percolate downward, rather than maintain overland flow.

- d. SPUD-10 is 45 ft east of the WGL site. The baseline HHRA performed at this IR site indicated that the risks associated with all the human health scenarios considered exceeded the acceptable regulatory risk range. These risks were due to arsenic, chromium, and dibenz(a,h)anthracene in groundwater and lead and PCBs in surface soil. French's Stream separates the WGL from SPUD-10, so migration of contaminants from the WGL to SPUD-10 via groundwater or surface water flow should not occur. Given the risks associated with the WGL site, and its proximity to SPUD-10,

however, the Navy should consider the use of physical access restrictions, such as a fence that extends down the east side of French Stream between the western boundaries of subparcels OS-C-4 and SPUD-10 and the WGL to the north of the WGL south of Trotter Road, and along the western and southern boundaries of the WGL, totally surrounding the site.

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 SSTDC to evaluate the security needs for the West Gate Landfill with respect to the future development of the abutting transferred property. Currently, warning signs are in place around the West Gate Landfill, and there is no need for fencing because there is no unauthorized access to abutting property. If, during the redevelopment of adjacent areas, there is an unacceptable potential for people to access the West Gate Landfill site, then the Navy will, at that time, consider the appropriate specific access control measures. The pending Record of Decision for the West Gate Landfill will establish the final remedy to be implemented for the protection of human health and the environment.

- e. SPUD-10 is about 175 ft southwest from the ABTFSA site. The Draft Final Phase II RI Report for the ABTFSA shows no unacceptable human health risks associated with the site.

Response: Comment noted. The Navy, EPA, and MADEP have agreed to the No Action Proposed Plan for Site 8 (Abandoned Bladder Tank Fuel Storage Area) of Oct 02. Therefore, Site 8 does not adversely affect the transfer of subparcel SPUD-10.

7. Page 17, Trotter Road Extension (TRE).

- a. TRE is about 85 feet northwest of the U.S. Coast Guard (USCG) Buoy Depot Site. Primary risks at that site are associated with manganese in groundwater and lead in sediment and subsurface soil. Contaminant migration from the Buoy Depot to the TRE is not anticipated as groundwater flow is to the southeast, and the lead is in sediments downgradient of the site. Therefore, assuming the chain-link fence surrounding the property remains intact, and warning signs are in place, the TRE is suitable for transfer.

Response: Comment noted. The USCG Buoy Depot remains an active facility. It is the Navy's understanding that the Buoy Depot fenceline will remain in place and that the USCG will be implementing a removal action under CERCLA in 2003. However, the Navy believes that the Trotter Road Extension is suitable to transfer in its own right, given that its future use will remain that of a public roadway that will not be impacted by the conditions at the Buoy Depot, as acknowledged by EPA. Management of risks at the Buoy Depot is the responsibility of the USCG.

EPA SPECIFIC COMMENTS ON ENCLOSURE (2)

1. Item 8(a) and (c) refer to "waiving" the restriction once the Navy, EPA, and MADEP agree that certain requirements have been met. The text should refer to "removing" or "lifting" the restriction, not "waiving" it. In addition, and more important, the text should provide more detail about how the restriction would be removed, e.g., that the Navy, EPA, and MADEP would all have to agree in writing.

Response: As requested, the last sentences of clauses 8(a) and 8(c) of enclosure (2) have been modified to indicate that the restriction can be removed (rather than waived) once the Navy, EPA Region I, and MADEP provide written approval. The term "waived" has been similarly replaced with the term "removed" in the other items under clause 8.

EPA SPECIFIC COMMENTS ON ENCLOSURES (3), (4), and (5)

1. These enclosures provide information on IR Sites, MCP sites and RIAs, respectively. The third column in each of these tables is labeled "Approximate Distance to Nearest FOST Subparcel." In actuality, this column appears to list additional FOST subparcels within 200 ft of the environmental site, not just the nearest. Please correct the heading for this column.

Response: The column heading has been clarified as "Approximate Distance to Nearby FOST Subparcels."

2. Enclosure 3, Page 3. It is unclear why the line for Hangar 2 does not identify the FOST subparcels within 200 ft. Is this because this site has been nominated for CERCLA? Please explain and update the table.

Response: At the time of the draft FOST, the extent of the Hangar 2 site had not been determined. Since that time, the

Navy plans to address IR Program Site 10 as the Hangar 2 apron (including the building and its associated EBS sites) and the off-apron area as AOC 30B (former RIA 30B, which will also be addressed as part of AOC 61 [TACAN Outfall]). As such, the following text has been added to the third column of enclosure (3) for the Hangar 2 (IR Program Site 10) row:

100 ft from OS-C-4 and 100 ft west of SPUD-9

3. Enclosure 5. This enclosure identifies all RIAs that either overlap or lie within 200 ft of one or more of the subparcels. The entries in the status column are not always clear, especially with regard to whether there has been final regulatory concurrence in an NFA decision. Please ensure that this point is clearly indicated for each RIA (i.e., either "Regulators Concur with NFA" or "Regulators have not yet Concurred with NFA").

Response: The status column has been clarified as requested.

MADEP COMMENTS ON THE MEMORANDUM FOR THE RECORD

1. Page 1: As indicated in the list of enclosures, a solid waste inventory had not been prepared at the time the draft FOST was submitted. Consequently, the Department cannot concur on the suitability for transfer of the subparcels described in the draft FOST until the solid waste inventory is submitted and agreement is reached on the management and disposal of the solid waste present on the FOST subparcels.

Response: The Navy issued a solid waste inventory/mitigation plan for the FOST subparcels in Aug 02. The inventory/plan has been included as enclosure (8) of the FOST.

As stated in Department of Defense (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, 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 (MADEP) and the redevelopment authority (SSTDC) regarding the status of the solid waste debris areas with respect to the pending property transfer.

2. Item 5: The Department understands that the Navy intends to complete required remedial work at the 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. Consequently, the following subparcels are not suitable for transfer because they contain at least one active RIA: OS-C-4 (RIAs 2B and 2C), SPUD-8 (RIAs 47 and 78C), SPUD-9 (RIA 46), and SPUD-10 (RIA 2C).

Response: As summarized in enclosure (5), the Navy has since obtained regulatory concurrence on NFA for the cited RIAs and they are, therefore, suitable to transfer.

MADEP COMMENTS ON THE EBST

Subparcel OS-C-4

1. As defined in Figure 4, this subparcel is not suitable for transfer as it includes RIAs 2B and 2C, which are currently under investigation.

Response: As summarized in enclosure (5), the Navy has since obtained regulatory concurrence on NFA for the cited RIAs and they are, therefore, suitable to transfer.

2. Transformers in subsurface vaults associated with the optical landing system, located adjacent to the east and west side of Runway 17-35, should be assessed for the presence of PCBs. If PCBs are confirmed to be present, the transformers should be removed prior to transfer. In addition, further assessment may be required to determine whether or not PCBs have been released to the environment.

Response: The Navy has addressed potential PCBs from the optical landing system vaults under EBS RIA 1. Initially, RIA 1 included two locations far outside of the FOST subparcels. It was more recently determined that there were two additional vault locations, one of which is contained within subparcel SPUD-10.

The new information about EBS RIA 1 in subparcel SPUD-10 has been added to the FOST. In Apr 02, the Navy pumped the water out of the vault in SPUD-10 and collected a sample of this water, as well as a sample of what little sediment was present at the bottom of the vault. The transformer in the vault was non-PCB, as indicated by a label on the transformer, and because the transformer was installed circa 1990 (when non-PCB transformers were used). In Jun 02, the Navy removed the electrical equipment (transformer and wiring) and backfilled

the vault with clean soil. The contractor's closeout report has been distributed and is excerpted in the NFA decision document. The Navy issued a final NFA Decision Document for RIA 1 in Sep 02 and has obtained regulatory concurrence. Therefore, RIA 1 is suitable to transfer.

3. Transformers in the utility vaults and wells associated with the runway and taxiway lights should be assessed for the presence of PCBs. If PCBs are confirmed to be present, the transformers should be removed prior to transfer. In addition, further assessment may be required to determine whether or not PCBs have been released to the environment.

Response: The Navy has located documentation (available for review at the CSO) that the runway's power isolation transformers were replaced in 1995, which post-dates the *PCB-Free Activity Report* (4 Jan 95). The *PCB-Free Activity Report* certifies that the transformers, capacitors, and hydraulic systems at the Base have been tested and do not contain PCBs exceeding a concentration of 50 parts per million. The *PCB-Free Activity Report* is also available for review at the CSO.

4. The following solid waste should be reused, recycled, or properly disposed in accordance with 310 CMR 19.000 prior to transfer:
 - A discarded concrete runway light vault located in the woods approximately 150 ft west of the north end runway 17-35.
 - Fire hose and scrap metal (jet engine blast deflector?) located approximately 100 ft west of the Fuel Farm swale.
 - Debris including fence posts, pipe, an oil boom, railroad rail, a chemical locker, a concrete block, a highway barrel marker, and remediation equipment located in and near Building 90/3.

Response: See Response to MADEP's Memorandum Comment No. 1.

Subparcel SPUD-8

1. As defined in Figure 5, this subparcel is not suitable for transfer because it includes RIAs 47 and 78C, which are currently under investigation.

Response: As summarized in enclosure (5), the Navy has since obtained regulatory concurrence on NFA for the cited RIAs and they are, therefore, suitable to transfer.

2. Building 99: An electrical device immersed in an unknown fluid was observed in a utility box mounted adjacent to the southwestern wall of Building 99. A label on the inside of the box included the statement: "use only NEMA grade 10C transformer oil." The fluid should be assessed to determine whether or not it contains oil or hazardous materials (OHM) and, if so, removed prior to transfer.

Response: During the inspection by Navy, EPA, and MADEP personnel, no visual indication of a release from this box was observed (i.e., no cracks in the utility box, no staining on the ground, no stressed vegetation, no chemical odors, no sheens). The Fuel Farm Rectifier, as this item has been designated, was removed by Foster Wheeler as documented in the *Final Closeout Report, Supplement 5 to Final Work Plan CTO 48 Compact Disk Submittal No. CTO 48-32 of 31 May 02.*

3. Fuel Farm Area:

- If present, the drywells associated with the five Fuel Farm jet fuel and aviation gasoline USTs (Figure 1-3, *Phase IV Final Inspection Report, Completion Statement and Class A-2 Response Action Outcome Report, Fuel Farm Site, RTN 3-10858*, dated January 2002) should be closed in accordance with MADEP guidance <http://www.magnet.state.ma.us/dep/dws/files/ws94001.htm>).

Response: The drywells were excavated as part of the removal of the storage tanks.

- Iron-staining and sheens were observed in water running from an active seep observed near the northwest corner of Building 51 to the Fuel Farm swale. The discharge should be assessed to determine if it is causing an adverse ecological impact, and, if so, should be addressed prior to transfer.

Response: The Navy has completed its investigation and remediation of impacts related to past Navy activities at the former Fuel Farm (see the final RAO report of 19 Feb 02).

The observed seep was an upwelling of groundwater and was not a discharge from Navy infrastructure. It is common for naturally-occurring iron in such seeps to precipitate out of the water, as dissolved iron is oxidized when the groundwater comes into contact with air, thereby staining the ground surface. Such iron staining is not unique to

the Fuel Farm area, as it has been observed throughout the Base. The Navy's upcoming watershed evaluation program will confirm its source (anaerobic groundwater precipitating iron upon stream entry) and assess potential ecological impacts.

It is the Navy's understanding that the SSTTDC plans to redevelop most of the former Fuel Farm area into a large building with its associated grounds and large parking lot as part of their Stage 1 redevelopment of the Base. Therefore, the iron staining/sheen will not adversely impact the environment after the property is transferred.

- Remaining underground fuel pipelines, if any, should be assessed to determine whether or not they are a source or potential sources of a release of fuel to the environment. Any release or potential release that is identified should be addressed prior to transfer.

Response: There are no documented fuel pipes remaining at the former Fuel Farm site. As documented in the *Phase IV Remedy Implementation Plan* of Sep 97, underground piping was removed as part of the MCP activities for the Fuel Farm (Section 1-5, page 1-8, 1st bullet of the Plan). The Navy completed a final RAO in Feb 02 for the Fuel Farm site.

- Concentrations of petroleum constituents in some samples from subsurface soil not subsequently removed from Area 1, 2, and 3 exceeded MCP Method 1 S-1 standards (Tables 6-1, 6-3, 6-4, 6-6, 6-7, 6-9, and 6-12; *Phase IV Final Inspection Report, Completion Statement and Class A-2 Response Action Outcome Report, Fuel Farm Site, RTN 3-10858*, dated January 2002), indicating that a potential future risk might exist if occupants or workers are exposed to remaining contaminated soil in a manner not anticipated by the risk assessment assumptions (e.g., residential uses such as gardening).

Response: It is the Navy's understanding that, as part of their Phase I redevelopment of the Base, the SSTTDC plans to redevelop most of the former Fuel Farm area into a large building with its associated grounds and large parking lot. Furthermore, the approved zoning for the Fuel Farm area (SPUD) does not allow residential reuse of the area.

The Exposure Point Concentration (EPC) for soil at the Fuel Farm does not exceed the MCP Method 1 S-1 standards; therefore, the MCP requirements are met and an Activity and

Use Limitation was not required for the site. However, as a notification to the property Grantee, the EBST and Enclosure (4), which will be made part of the deed along with the rest of the FOST and its enclosures, have been modified to state that there are isolated pockets (point exceedances) of petroleum-related compounds in soil.

- Concentrations of petroleum constituents in groundwater samples collected from several existing monitoring wells exceeded MCP Method 1 GW-2 standards (MW-9, MW-21, and MW-28; Table 6-13; *Phase IV Final Inspection Report, Completion Statement and Class A-2 Response Action Outcome Report, Fuel Farm Site, RTN 3-10858*, dated January 2002), indicating that a potential future risk to building occupants might exist if buildings are constructed in the vicinity of the wells.

Response: Only one of the wells referenced in the comment (MW-28) provides post-remediation data. MW-28 is located in an area where an additional remediation round was completed in 2001 to remove the petroleum source in that area. There has been no resampling of that well after the additional remediation step in 2001; therefore, the current concentrations are expected to be lower than cited in the comment. Overall, the Navy has completed all MCP activities at the former Fuel Farm and has completed a final RAO in Feb 02, thereby satisfying the MCP requirements and closing the site. As a notification to the property Grantee, the EBST and Enclosure (4), which will be made part of the deed along with the rest of the FOST and its enclosures, have been modified to state that there was an isolated/point exceedance of the GW-2 standard in an area that subsequently received additional remediation.

4. The following solid waste should be reused, recycled, or properly disposed in accordance with 310 CMR 19.000 prior to transfer:
 - Snow fence, plastic pipe, concrete post mounts, a hazardous materials locker, and remediation equipment in and near Building 51.
 - PVC pipes stored on the chain-link fence located approximately 100 ft east of Building 51.
 - Electrical wire protruding from the ground near the former location of UST 79/1.

Response: See Response to MADEP's Memorandum Comment No. 1.

Subparcel SPUD-9

1. As defined in Figure 6, this subparcel is not suitable for transfer because a final decision document has not been submitted for RIA 46.

Response: The Navy submitted the final NFA Decision Document for RIA 46 in Apr 02 and has obtained regulatory concurrence. Therefore, it is suitable to transfer.

2. The indoor air hazard caused by fungus in Building 103 should be addressed (health hazard).

Response: The potential fungal hazard identified in Building 103 is addressed in clause 8(g) of enclosure (2). See also the Response to MADEP's Comment No. 1 on enclosure (2).

3. The pile of concrete debris located in the woods approximately 100 ft east of Building 20 should be reused, recycled, or properly disposed of in accordance with 310 CMR 19.000 prior to transfer.

Response: See Response to MADEP's Memorandum Comment No. 1.

Subparcel SPUD-10

1. As defined in Figure 7, this subparcel is not suitable for transfer because it includes RIA 2C, which is currently under investigation.

Response: As summarized in enclosure (5), the Navy has since obtained regulatory concurrence on NFA for RIA 2C. Therefore, it is suitable to transfer.

2. The subsurface aircraft arresting mechanisms, located adjacent to the east and west sides of Runway 17-35, should be assessed to determine if they contain OHM, and, if OHM is present, appropriate remedial action should be completed prior to transfer.

Response: Determination of whether such assessment should be pursued was part of the Basewide Phase I EBS program. No RIA was designated for the aircraft arresting mechanisms at that time. No new information has been presented to the BCT to warrant a new investigation (i.e., the presence of the

arresting mechanisms was known at the time of the Phase I EBS and no potential releases of OHMs have been identified).

Furthermore, the Navy recently removed the aircraft arresting mechanisms. At that time, there was no visual indication of a release of hazardous substances or petroleum compounds (i.e., no observed leaks and cracks). Further information is available for review in the *Final Removal Action Report, RIAs 109, 95C, 16, Runway Arresting Gear, Various Solid Waste and Hazardous Materials Removals* by Foster Wheeler Environmental Corporation of May 02.

3. Transformers in subsurface vaults associated with the optical landing system, located adjacent to the east and west side of Runway 17-35, should be assessed for the presence of PCBs. If PCBs are confirmed to be present, the transformers should be removed prior to transfer. In addition, further assessment may be required to determine whether or not PCBs have been released to the environment.

Response: See the Response to MADEP's EBST Comment No. 2 for subparcel OS-C-4.

4. Transformers in the utility vaults and wells associated with the taxiway lights should be assessed for the presence of PCBs. If the presence of PCBs is confirmed, the transformers should be removed prior to transfer. In addition, further assessment may be required to determine whether or not PCBs have been released to the environment.

Response: See the Response to MADEP's EBST Comment No. 3 for subparcel OS-C-4.

EBS Review Item Area

1. Subparcels containing the following RIAs will not be suitable for transfer until associated response actions and decision documents are completed: RIAs 2B, 2C, 46, 47, and 78C.

Response: As summarized in enclosure (5), the Navy has since obtained regulatory concurrence on NFA for the cited RIAs and they are, therefore, suitable to transfer.

2. RIA 76: As indicated on page 19, a solid waste inventory had not been prepared at the time the draft FOST was submitted. Consequently, the Department cannot concur on the suitability for transfer of the subparcels described in the draft FOST until the solid waste inventory is submitted and agreement is

reached on the management and disposal of the solid waste present on the FOST subparcels.

Response: See the Response to MADEP's Memorandum Comment No. 1.

PCBs

1. As noted in a preceding section, an electrical device apparently immersed in a cooling fluid was observed in a utility box mounted adjacent to the southeastern wall of Building 99 (Subparcel SPUD-8). The fluid should be assessed to determine whether or not it contains PCBs and, if so, removed prior to transfer.

Response: See the Response to MADEP's Comment No. 2 on subparcel SPUD-8.

2. As noted in preceding sections, power isolation transformers were observed on subparcels OS-C-4 and SPUD-10. These transformers should be assessed for the presence of PCBs. If the presence of PCBs is confirmed, the transformers should be removed and properly disposed of prior to transfer. In addition, further assessment may be required to determine whether PCBs have been released to the environment.

Response: See the Response to MADEP's EBST Comment No. 3 for subparcel OS-C-4.

Asbestos

1. An asbestos-containing material (ACM) inventory for Building 90/3 should be prepared prior to transfer and included in the revised FOST.

Response: Given current information, the FOST has been amended to indicate that ACMs may be present in Building 90/3. It is the Navy's understanding that SSTITDC plans to demolish Building 90/3 as part of their Phase II B redevelopment of the Base. If that plan is changed in the future, then at the time of decision to reuse, the Navy will coordinate with SSTITDC to implement DoD's BRAC policy on asbestos in buildings.

2. The statement specifying the post-transfer use of the buildings included in the FOST subparcels should be obtained and included in the revised FOST to ensure that the evaluation of the suitability of the buildings for transfer is based on the intended future use of the buildings. Mr. John Macauley

with the Bureau of Waste Prevention (978-661-7633) should be contacted to determine requirements of the asbestos in the buildings.

Response: Table 1 of the FOST Memorandum provides a summary of the proposed use for each subparcel. A definitive plan for the post-transfer use of each building is not available at this time, although the reuse will be in accordance with the zoning allowances. When that is available, the Navy will implement the DoD BRAC policy for asbestos in buildings. State requirements for asbestos in reused or demolished buildings will be the responsibility of the property Grantee.

ASTs and USTs

1. This section should include brief descriptions of the antifreeze aboveground storage tanks (ASTs) that were located with the aircraft arresting equipment in subparcel SPUD-10.

Response: The text has been modified as requested.

Solid Waste

1. This section indicates that the presence of solid waste on the FOST subparcels does not preclude the FOST. However, it is the Department's general understanding that a fundamental purpose of the BRAC program is to ensure that DoD property is brought into compliance with all applicable federal, state and local environmental laws prior to transfer. In particular, it is the Department's understanding that RIA 76 (basewide solid waste) was designated to ensure that solid waste on South Weymouth NAS property would be brought into compliance with the applicable solid waste regulations. Consequently, the FOST should ensure that the solid waste in the FOST subparcels will be addressed in accordance with 310 CMR 19.000.

Response: See the Response to MADEP's Memorandum Comment No. 1. The FOST documents suitability with respect to CERCLA criteria and provides notification of other relevant environmental conditions such as solid waste. In addition to this, the Navy is also working to satisfy the State's solid waste regulations prior to transfer separately from the FOST process.

Figures

1. Figure 3:
 - All of the MCP sites should be labeled.

- The boundary between subparcels INST-2 and OS-C-3 should be identified.

Response: As noted at the bottom of Figure 3, only sites within 200 ft of the FOST subparcels are labeled. The other MCP sites depicted in Figure 3 have all been closed and do not affect the FOST.

The figure has been modified to indicate the boundary between subparcels INST-2 and OS-C-3.

2. Figure 5: Building 51 should be labeled.

Response: The figure has been modified accordingly.

MADEP COMMENTS ON ENCLOSURE (1)

1. Tables 2 and 3

- Building 99 should be listed in these tables if the presence of PCBs is confirmed in the fluid observed in the utility box mounted adjacent to the southeastern wall of the building (refer to Comment 1 under the PCBs heading).

Response: Comment noted.

- Power isolation transformers in subparcels OS-C-4 and SPUD-10 should be listed in these tables if the presence of PCBs in the transformers is confirmed (refer to Comment 2 under the PCBs heading).

Response: See the Response to MADEP's EBST Comment No. 3 for subparcel OS-C-4.

- Aircraft arresting equipment in subparcel SPUD-10 should be listed in the tables due to the past presence of antifreeze in associated ASTs and subsurface damping mechanisms.

Response: The antifreeze reservoirs of the arresting gear mechanisms have been added to the tables, along with the approximate volumes and dates of use.

MADEP COMMENTS ON ENCLOSURE (2)

1. Item 8 (Miscellaneous Site Specific Clauses): Clauses (e) and (f), which are apparently intended to minimize exposures to lead dust and fungus in Buildings 51 and 103, are inappropriate because the FOST is intended to support a permanent transfer of property. To ensure that the

property is suitable for transfer at the time of transfer, these conditions should be corrected prior to transfer.

Response: It is assumed this comment meant to cite clauses (f) and (g) of enclosure (2), which pertain to lead dust and fungus, whereas clause 8(e) pertains to groundwater use.

Clauses (f) and (g) provide notification of potential hazards and require the Grantee to either take appropriate precautionary measures, or to complete mitigation of the risks in support of the specific reuse. Therefore, given those permanent requirements, Buildings 51 and 103 are suitable for transfer to the Grantee. As noted in clause 8(f), DoD policy would only require the Navy to complete lead abatements if the buildings were intended for residential reuse. The approved zoning uses for Buildings 51 and 103 are non-residential. Finally, lead dust and fungus abatements in these buildings are likely to be unwarranted because SSTDC has indicated to the Navy that these buildings are likely to be demolished in support of the redevelopment of the Base.

SSTTDC GENERAL COMMENTS

1. To date, neither the first FOST (unencumbered) nor this FOST (#2) show (on a figure) the area northwest of building 32 as part of a FOST. This mostly paved area is Navy property to the edge of White Street and although it is beyond the existing fenceline, it should be transferred to the Corporation following review through one of the first two FOSTs. This area will be part of the first Stage of property development at the Base.

Response: Enclosure (1) (i.e., the EBST) of the first FOST (final of Aug 02) states the following for subparcel OS-W-1 (which contains Building 32):

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).

Although it is not clear from the figures presented in that FOST (which are only drawn to the fenceline due to limitations on the available mapped areas), the text indicates that the parking lot is included in the first FOST.

2. Does the PCB-Free Activity Report of 1995 certify all transformers at the Base as being PCB-free - i.e. have all transformers been researched to determine the approximate age and type? If not, what will the Navy's course of action be to address the potential PCB-containing transformers that are still in place (transformers noticed during the 29 January 2002 site walkthrough attended by representatives of the EPA, MADEP, the Navy, EA, and the Corporation - transformers are present in runway lighting hand holes, metal utility boxes, etc.).

Response: See the Response to MADEP's Comment No. 3 on subparcel OS-C-4.

3. Historically, who has maintained sewer and water lines in the Trotter Road Extension subparcel - the Town of Weymouth or the Navy? The Corporation understands that the MBTA has been responsible for all snow removal from Route 18 to the railroad tracks and that the USCG has been responsible for snow removal from the tracks to the existing Trotter Road gate east of the buoy depot.

Response: Historically, the Navy has not maintained the utilities in that section of Trotter Road. Under a Grant of Easement on 20 Aug 97 between the Navy and the MBTA, the MBTA was given an easement and right-of-way for the construction, installation, operation, maintenance, repair, and replacement of that 250-ft length of roadway.

4. Please update all text pertaining to the status of the Fuel Farm site in the final version of this FOST.

Response: The text has been updated.

5. The following comments were generated from field observations made during the FOST #2 site walkthrough of 29 January 2002. The comments should be addressed prior to FOST signature:

- Buildings 51 & 90/3 - All potentially hazardous materials (Foster Wheeler or Navy field supplies, containerized soil samples, gas cans, cleaning agents, etc.) should be removed from these buildings, the yellow flammables locker outside of building 51 and the surrounding grounds.

Response: The Navy will remove containerized soil samples and stored hazardous materials (such as "decon" fluids and cleaning agents) from Buildings 51 and 90/3 prior to transfer.

- Building 99 - The nature of the fluid contained in the transformer box located at the southern exterior of this building should be investigated to determine if it is hazardous.

Response: See the Response to MADEP's Comment No. 2 on subparcel SPUD-8.

- Fuel Farm site - The surface water flow resulting from the blocked sewer line just northwest of building 51 should be investigated further. There is a noticeable sheen floating on an iron-rich puddle of water. The origin of the sheen is unknown - petroleum or biological related?

Response: See the Response to MADEP's Comment No. 3 on subparcel SPUD-8.

6. Overall this FOST document is well written. The Corporation appreciates the Navy's efforts in preparing this and other documents simultaneously to support our early development goals.

Response: Thank you.

SSTTDC COMMENTS ON ENCLOSURE (1)

1. P.3 - Is the document *EBS Review Items Requiring NFA under the EBS by EA, updated January 2002* available at this time?

Response: The document ("No Further Action List, Environmental Baseline Survey, Effective 18 January 2002") is available for review at the CSO library. The document was signed by the Navy, EPA, and MADEP in Feb 02 and closes further investigations under the EBS program at 55 RIAs.

2. P.9 - Should RIA 91 be included here? It appears to be greater than 200' from subparcel OS-C-4.

Response: Correct. At its closest point, the former Navy Exchange (NEX) filling station site is approximately 260 ft away from the eastern edge of subparcel OS-C-4. Therefore, both RIA 48 (NEX filling station leak detection failure) and RIA 91 (NEX filling station incidental drips/spills) and their associated MCP site (RTN 3-13316 - NEX Filling Station) will be removed from the discussion of subparcel OS-C-4.

3. P.9 - It appears that RIA 77 should be included as one of the EBS sites within 200' of subparcel OS-C-4.

Response: Correct. RIA 77 (UST leak tests) will be added to the discussion of sites within 200 ft of subparcel OS-C-4. However, the Navy, EPA, and MADEP have agreed that NFA is required for RIA 77 (Navy letter of Jan 02, signed Feb 02). Therefore, RIA 77 does not adversely affect the FOST of nearby subparcel OS-C-4.

4. Figure 3 - Please show where OS-C-3 and INST-2 meet on Shea Memorial Drive. Also, the five U.S. Coast Guard homes on Cross Terrace have been removed.

Response: The figure has been modified.

5. Figure 5 - Please label building 51 and remove the westernmost "Houghton Road" label.

Response: The figure has been modified.

6. Figure 6 - The shed east of building 17 has been removed.

Response: The figure has been updated.

7. Figure 8 - Please use a more detailed base map here (i.e. aerial photograph) - it is difficult to discern the area being "FOSTed."

Response: The figure has been clarified. As part of the transfer process, the Navy will prepare a detailed and accurate survey map.

8. All Figures—Please ensure that the dark subparcel boundary lines close, either in solid or dashed format.

Response: The figures have been modified to depict complete (closed) solid boundary lines for the FOST subparcels.

PUBLIC COMMENTS - MIKE BROMBERG OF ROCKLAND, MA

Note: The following comments are paraphrased from the letter received.

1. The FOST cannot conclude that the environmental conditions are suitable for the planned reuse because, as evidenced by various newspaper articles, a pending management agreement by the redevelopment agency with MassDevelopment will result in new zoning and infrastructure plans for the base. This FOST for 68.9 acres and the previous draft FOST for 600 acres (30 Mar 01) should be withdrawn until a fixed reuse plan is in-place.

Response: SSTTDC is the current local- and state-approved recipient for the majority of the property at the main Base of the former NAS South Weymouth. The Reuse Plan also has been approved by the towns and is still in effect.

The Navy is aware that the SSTTDC conducted talks in the past with MassDevelopment for management and financial assistance. However, as of the date of this final FOST, MassDevelopment is not involved with the redevelopment of NAS South Weymouth, and SSTTDC has since entered into an exclusive agreement with Lennar Partners to be the master developer.

In order to change any zoning in the reuse plan, the proponent (SSTTDC) would have to reopen public hearings in Weymouth, Abington, and Rockland, and receive a two-thirds approval vote by each town. In accordance with BRAC law, the Navy is required to transfer this closed Base as soon as feasible. Therefore, the Navy must proceed with the property transfer pursuant to the existing reuse and zoning plans.

If changes to the reuse plan/zoning occur after transfer, then the new property owner will be responsible to ensure that the conditions meet any new redevelopment plans. The Navy will remain liable to return and address any currently undiscovered sources of contamination that are a result of past Navy activities.

Therefore, the Navy will proceed with the ongoing FOSTs.

2. In lieu of a fixed reuse plan, the Navy should clean all the parcels to a level where there would be no identified human health risks in excess of regulatory guidance, including hypothetical future onsite residents (associated with surface water, surface soil, and groundwater) and for hypothetical

future recreational children (associated with surface soil and surface water).

Response: As explained in the above response, the existing Reuse Plan is considered final. Changes to the final Reuse Plan would require a motion by the SSTTDC and two-thirds approval by each of the three towns.

If a remedial action is conducted to a level such that commercial/industrial risks are mitigated but residential risks are not, then the Navy typically includes some form of an "institutional control" that disallows residential reuse of that site, regardless of the allowed uses under the zoning. MCP sites are handled similarly in that Activity and Use Limitations can be implemented as institutional controls to address residual risks. Furthermore, in accordance with CERCLA, the Navy, EPA Region I, and MADEP will conduct 5-year reviews for each site that has a CERCLA remedial action which does not render the site acceptable for unrestricted use and unlimited exposure. The purpose of 5-year reviews is to ensure that the remedial action remains protective of human health and the environment in the long-term and will include evaluations of any changes in land use.

3. If the FOSTs are not withdrawn, then the Navy should withdraw from the FOST any and all sites (e.g., EBS RIAs 2B and 2C) within the subject subparcels where all the work is not complete.

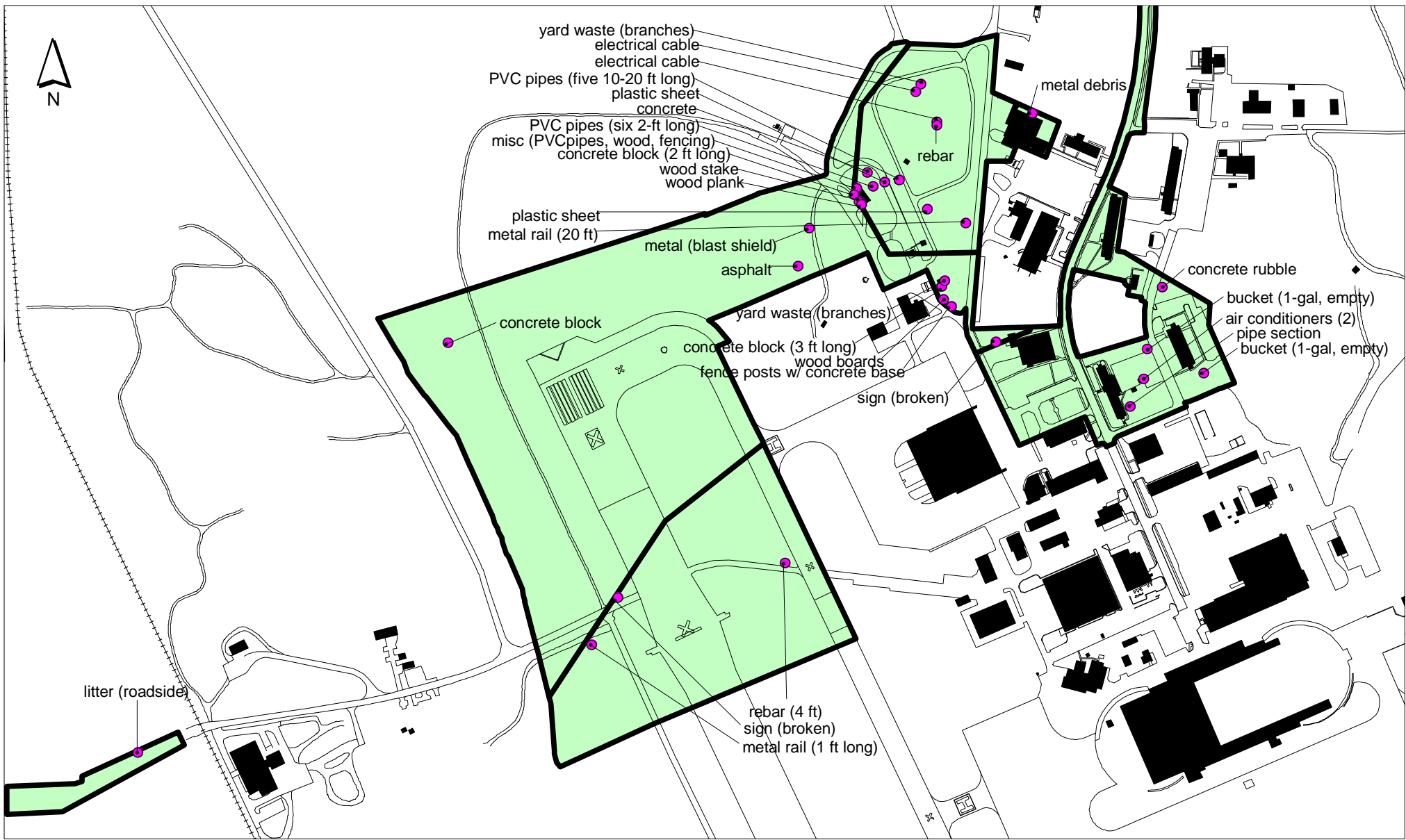
Response: As described in enclosures (1), (3), (4), and (5), the Navy has completed the investigations and obtained regulatory concurrence on the sites located within the FOST subparcels.

Enclosure (8) - Solid Waste Inventory for FOST2

<i>Subparcel</i>	<i>Description</i>	<i>Category</i>	<i>Approx CY</i>	<i>Alias</i>	<i>Proposed</i>	<i>Status</i>	<i>Notes</i>	<i>DEP Comment</i>
OS-C-4	air conditioners (2)	1	0.5	--	remove & NFA	present	stored behind shed	--
OS-C-4	asphalt	4	1	--	notify & NFA	present	--	--
OS-C-4	bucket (1-gal, empty)	3	0	--	remove & NFA	present	--	--
OS-C-4	bucket (1-gal, empty)	3	0	--	remove & NFA	present	--	--
OS-C-4	concrete block	4	1	--	notify & NFA	present	molded from 55 gal drum, possible light stand	OS-C-4 #4
OS-C-4	concrete block (3 ft)	4	0.1	--	notify & NFA	present	--	OS-C-4 #4
OS-C-4	metal (blast shield)	1	1	--	remove & NFA	present	--	OS-C-4 #4
OS-C-4	metal (broken sign)	1	0.1	--	remove & NFA	present	--	--
OS-C-4	metal, concrete (2 fence posts)	1, 4	0.5	--	remove & NFA	present	fenceposts and concrete base	OS-C-4 #4
OS-C-4	misc (broken sign)	1	0.2	--	remove & NFA	present	--	--
OS-C-4	pipe	1	0	--	remove & NFA	present	--	--
OS-C-4	wood boards	1	4	--	remove & NFA	present	--	OS-C-4 #4
OS-C-4	yard waste (branches)	1	3	--	notify & NFA	present	--	--
SPUD-10	metal rail (1 ft)	2	0.1	--	remove & NFA	present	possible RR tie section	--
SPUD-10	rebar (4 ft)	2	0	--	remove & NFA	present	--	--
SPUD-8	concrete	4	1	--	notify & NFA	present	--	--
SPUD-8	concrete block (2 ft)	4	0.1	--	notify & NFA	present	--	SPUD-8 #4
SPUD-8	electrical cable	1	0	--	remove & NFA	present	--	SPUD-8 #4

<i>Subparcel</i>	<i>Description</i>	<i>Category</i>	<i>Approx CY</i>	<i>Alias</i>	<i>Proposed</i>	<i>Status</i>	<i>Notes</i>	<i>DEP Comment</i>
SPUD-8	electrical cable	1	0	--	remove & NFA	present	--	SPUD-8 #4
SPUD-8	metal debris	1	0.5	--	remove & NFA	present	--	--
SPUD-8	metal rail (20 ft)	1	0.2	--	remove & NFA	present	--	--
SPUD-8	misc (PVC pipes, wood, fencing)	1	3	--	remove & NFA	present	--	SPUD-8 #4
SPUD-8	plastic sheet	1	0.1	--	remove & NFA	present	--	--
SPUD-8	plastic sheet	1	1	--	remove & NFA	present	--	--
SPUD-8	PVC pipes (five 10-20 ft long)	1	0.5	--	remove & NFA	present	--	SPUD-8 #4
SPUD-8	PVC pipes (six 2 ft long)	1	0.2	--	remove & NFA	present	--	SPUD-8 #4
SPUD-8	rebar	2	0	--	remove & NFA	present	--	--
SPUD-8	wood plank	1	0.1	--	remove & NFA	present	--	SPUD-8 #4
SPUD-8	wood stake	1	0	--	remove & NFA	present	--	SPUD-8 #4
SPUD-8	yard waste (branches)	1	1	--	notify & NFA	present	--	--
SPUD-9	concrete	4	0.5	--	notify & NFA	present	--	SPUD-9 #3
TRE	litter (roadside)	1	0.1	--	notify & NFA	present	bottles, papers, etc.; non-Navy litter	--

ABC = asphalt/brick/concrete C = central zone CY = cubic yards DEP = Department of Environmental Protection NFA = no further action OS = open space SPUD = special planned use district Category 1 = no chemical or safety hazard Category 2 = potential safety hazard Category 3 = empty containers Category 4 = ABC



Note: FOST Subparcels are not yet finalized.

Figure 1
Solid Waste Debris
in FOST Subparcels