

Restoration Advisory Board (RAB) Meeting, 10/18/2018

Former Fort Devens Army Installation, Devens, MA

Attendees (see RAB sign in sheet): Army BEC, PACE, EPA (Federal Facilities, Section Community Relations Specialist), MA DEP (Drinking Water Program, Bureau of Waste Site Cleanup) MassDevelopment (Ron Ostrowski), Ayer Water Manager (Mark Wetzel), USACE, KOMAN Government Solutions, two public water system operators (WhiteWater and the water operator for Harvard Green on Ayer Road), a representative of the Devens Commission and a resident.

Presentation (see attached). The presentation provided a background on PFAS; the results of the community and private well sampling; the results from the recent town water supply well sampling; a summary of the PFAS RI work completed to date in Area 1; the upcoming work for Areas 1, 2 and 3; and the next steps/schedule. Overall conclusions of the presentation are that none of the private water supply wells or small and large public water supply wells sampled had finished water above the EPA Lifetime Health Advisory (LHA) of 70 parts per trillion (ppt) and given that there are no exposures above the EPA LHA, the Army is focusing on the RI to determine the nature and extent of PFAS contamination at the former Fort Devens and assess potential risk from exposure to contaminated media.

Questions following or during presentation

What is the unregulated contaminant monitoring rule (UCMR)?

DEP indicated that the rule was for monitoring new compounds identified in public water systems with populations greater than 10,000 and that every five years new compounds were added to the list. The PFAS compounds PFOS, PFOA, PFBS, PFHxS, PFHpA, and PFNA were added as part of UCMR 3 in 2012. The question came up whether the detection limit for PFAS compounds monitored under UCMR3 were the same as those used during the Army's sampling. The Army detection limits were generally 2 ppt, while the DEP indicated that the detection limits used under UCMR 3 were higher, at 20 to 40 ppt. DEP indicated that they were working with the towns to address lowering detection limits under UCMR 3.

Following the conversation on UCMR, DEP made a point of clarification regarding the use of private wells in the presentation. DEP indicated that some of the wells referred to as private wells in the presentation should actually be referred to as small public water supply systems. DEP also pointed out that these are regulated by DEP.

What does it mean that you list a bunch of PFAS compounds on your table, which would make your numbers higher than 70 ppb but only refer to the two compounds (PFOS/PFOA)?

Army BEC indicated that the Army is currently comparing data to the EPA LHA, which includes only PFAS and PFOA. However, the laboratory list includes more compounds than those in the LHA. The state does not currently have a promulgated standard but recommends using five compounds for evaluation (PFOS, PFOA, PFNA, PFHxS, and PFHpA). Also, the table lists all the detected PFAS analytes, not just the two summed for the EPA LHA or the five summed for the DEP guidance value.

The PFAS concentrations at Ayer well #7 was discussed. The well was offline before the sampling in September for maintenance. The well will be resampled in October 2018.

What is the source of PFAS contamination? Are you using groundwater flow data from your site to plan remediation? DEP and PACE asked about using a time critical removal action to cut off groundwater from the source, in particular at the former airfield where you have high concentrations (39,000 ppt).

Army explained that a better understanding of sources is needed (in some cases a source has not even been identified) and then once the nature and extent of contamination is determined an evaluation of risk. Army indicated that contamination at Area 3 (Airfield) does not meet the threshold for a time critical removal action at this time because an imminent threat or risk has not been identified. EPA agreed.

It was explained that the water in the Nashua River, where groundwater discharges, is not being used for drinking water, and thus, there is not an exposure pathway. The RI will evaluate the impact of groundwater discharge to the river.

PACE indicated that they were concerned with a hotspot located 1,000 feet from the Nashua River. There was some discussion whether the river's possible federal designation as a Wild and Scenic River would allow for cleanup to be accelerated.

DEP indicated that by reducing concentrations at the source, you are taking care of 90 percent of the problem and that time critical removal action is being proactive. DEP referred to an Alaskan site as an example of a proactive time critical removal action. Some other examples where actions were taken were discussed and included Pease AFB and Joint Base Cape Cod. However, it was discussed that the situation was somewhat different at Devens because the contamination was found in the water supply wells and the Army is working to track the contamination back to locate the source. The question came up again that the water (Nashua River) may be used for drinking water. However, EPA indicated to DEP that they believed this was reviewed previously and was not the case (the Nashua River is Class B).

Can we (PACE) receive interim data submittals? Are any of the data available through website?

Army BEC indicated that PACE and town could participate on the weekly calls and review the interim data submittals. Army BEC explained that the work plan was dynamic and we would be reviewing data as it comes in with stakeholders to determine any data gaps/steps outs.

How much longer to complete Area 1 Field Work (Town of Ayer)?

KGS indicated that the vertical profiles would be completed by end of the year but step out would be performed in 2019. Army BEC indicated that an enforceable schedule was set up with EPA and RI was due in September 2019.

Mark Wetzel (Town of Ayer) indicated he was concerned with operation of Well 8 relative to winter coming and would like Army to share as much information as possible regarding the status. Army agreed to keep town updated.

Mark Wetzel provided a status of the Town's work relative to evaluating treatment options for PFAS. The town appropriated 4.2 million to design treatment plant and review options to treat PFAS with absorptive media. He indicated that the town had tested two types of carbon media and two types of ion exchange media and a combination of ion exchange and carbon media using rapid column testing. He indicated that the ion exchange media appeared most promising and was more desirable because it

had a smaller footprint to incorporate into the plant. He said that following state approval of results and the preliminary design, the engineering bid would be sent out.

Are you seeing consistent results in well 8 and wells overall?

Army BEC indicated results are generally consistent overtime.

Is EPA going to change the Lifetime Health Advisory? Is EPA going to promulgate an MCL?

EPA indicated that they would be surprised if the EPA LHA is revised. EPA committed to considering an MCL but indicated that promulgating an MCL is a long process with some complicated steps.

What about the ATSDR Study?

EPA indicated that ATSDR is using the same toxicity information as EPA but their calculations are different. DEP indicated that there should be a groundwater cleanup standard for some PFAS compounds by the end of the year.

The next RAB meeting will be held on January 24, 2019 at the Devens Commerce Center at 6:30 pm.