



**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 104TH FIGHTER WING (ANG)  
BARNES AIR NATIONAL GUARD BASE, WESTFIELD MA**



6 January 2017

Colonel James J. Keefe, MA ANG  
Commander  
104th Fighter Wing  
175 Falcon Drive  
Westfield, MA 01085-1482

Ms. Eva Torr  
Massachusetts Department of Environmental Protection - Western Regional Office  
436 Dwight Street  
Springfield, MA 01103

**SUBJECT: Westfield - RTN: 1 - 0020093 Enforcement Document # 00000277 Barnes Air National Guard Base IR Site I - Fire Training Area IRP Site 6 - North and South-Old Fire Training Areas Notice of Response Action**

Dear Ms. Torr,

The 104th Fighter Wing received your Notice of Response Action (NORA) letter dated 21 December 2016. The NORA letter requires the Massachusetts Air National Guard (MA ANG) to conduct response actions to eliminate potential PFOA/PFOS impacts to private residential and non-community drinking water supply wells located hydrogeologically downgradient of Barnes ANG Base.

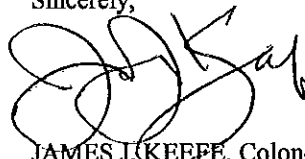
At this time there has been no direct connection between activities associated with the MA ANG and PFOA/PFOS contamination of public, private residential and non-community drinking water supply wells. The MA ANG is in the process of creating a Site Investigation (SI) work plan. As in the past, the MASSDEP will have an opportunity to comment on the draft work plan prior to actual fieldwork. An Immediate Response Action (IRA) Plan cannot be prepared unless PFOA/PFOS contamination is detected during the SI and a path of contamination to the city and private wells has been established. If direct evidence is shown that the contamination of off base wells is due to a release from ANG operations, MA ANG would consider that evidence and work with the MASSDEP on appropriate measures for an IRA Plan. Such evidence would include groundwater sampling, hydrogeological studies, etc., that confirm a source, pathway and receptor. It is Air Force policy to address any releases that pose an unacceptable risk and to work with the regulator to ensure public safety, so any information that the state can provide would be appreciated.

All Environmental Restoration (ERP) sites are investigated in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)(42 U.S.C. §§ 9601-9675) and the National Contingency Plan (NCP)(40 C.F.R. Part 300). The use of CERCLA and the NCP in investigating potential releases of PFOA/PFOS follows Air Force and Department of Defense (DoD) policy. As in the past, the MA ANG will follow the substantive requirements of the Massachusetts Contingency Plan (MCP) that are Applicable or Relevant and Appropriate Requirements (ARARs) as authorized under the NCP. The MA ANG will work closely with MASSDEP and the public on every step in this process, and as authorized under the Defense - State Memorandum of Agreement (DSMOA) Program, funds will be provided to MASSDEP for its time and effort in reviewing MA ANG documents generated for this project.

In the NORA it is stated that MASSDEP may decide to conduct its own Response Actions and then seek reimbursement. If MASSDEP decides to conduct its own Response Actions, it would be our request that MASSDEP work closely with the MA ANG so that the MA ANG can incorporate any data collected into the forthcoming SI. Any requests for reimbursement will be processed in accordance with the Air Force's Claims process and forwarded to the Department of Justice for adjudication.

The point of contact for this issue is Mr. John W. Richardson, Base Environmental Coordinator, (413) 568-9151, ext. 6981710 or email [john.w.richardson78.civ@mail.mil](mailto:john.w.richardson78.civ@mail.mil). If you have any legal questions concerning this matter, the point of contact is Mr. Randy Chambers, Chief, Environmental Law, Office of Chief Counsel, National Guard Bureau, (703) 607-2729, or email [randy.s.chambers.civ@mail.mil](mailto:randy.s.chambers.civ@mail.mil).

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Keefe', written over a circular scribble.

JAMES J. KEEFE, Colonel MA ANG

cc: NGB/A4OR  
Westfield Mayor