

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



DEPT. OF ENV. PROTECTION
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14 April 2017

Colonel James M. Suhr
 Commander 104 Fighter Wing
 175 Falcon Drive
 Westfield, MA 01085-1482

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

SUBJECT: Westfield 1-0020093 Barnes Air National Guard Base Review of Draft Final Work
 Plan FY16 – Phase I Regional Site Inspections of Perfluorinated Compounds

In reply to the comments on your letter of 8 February 2017, the following responses are provided:

1. The general scope of the proposed facility assessment and the proposed methods, standards, practices, and equipment meets or exceeds the Massachusetts Contingency Plan (the MCP- 310CMR 40.0000) Response Action Performance Standard (RAPS), specifically, 310 CMR40.0191.

ANG Response: The Air National Guard and its consultant, Amec Foster Wheeler, will conduct the proposed Site Inspection in accordance with the methods, standards, practices, and equipment prescribed by the Massachusetts Contingency Plan (the MCP- 310 CMR 40.0000) Response Action Performance Standard (RAPS), specifically, 310CMR 40.0191. These provisions are considered Applicable or Relevant and Appropriate Requirements (ARARs) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Additionally, we will use eDEP for all correspondence and reports going to Massachusetts Department of Environmental Protection (MassDEP).

2. In lieu of comprehensive investigations at Fire Training Area (FTA-1) and the Fire Department Equipment Testing Area additional soil borings/monitoring wells should be added to the scope of work at on-base locations in the immediate vicinity of these potential areas of concern (PAOCs). Three soil borings and a minimal of one additional temporary monitoring well should be installed in the immediate vicinity of the Fire Department Equipment Testing Area. At a minimum, one additional soil boring should be included and soil samples should be collected during the installation of the proposed monitoring well located within the current base boundary adjacent to FTA-1.

ANG Response: Pursuant to MassDEP request, the scope of work has been expanded to include limited initial assessment of the Fire Training Area/IRP Site 1 south of the fire station (PRL Area 06), and the Fire Department Equipment Test Area (PRL 08). The proposed investigations include one soil boring and one groundwater monitoring well in each of the two areas as shown on Figure 3B and 3C. A surface soil sample (0 to 2 ft below grade) will be collected from each of the four new borings and analyzed for Perfluorinated Alkylated Substances (PFAS). Surface soil sampling is proposed based on the potential application of Aqueous Film Forming Foam (AFFF) to the ground surface in these areas (as opposed to potential sources at depth, like tanks or piping). One groundwater sample from each of the two new wells will be analyzed for PFAS. It is understood that follow-up investigations may be required by MassDEP based on the findings of the proposed limited inspection program.

3. Section 8.3.1 of the Work Plan indicates proposed soil borings will be advanced to a maximum depth of 15 feet below grade (ftbg). Given the depth of groundwater at the base is approximately 20 to 45 ftbg, soil boring should be advanced to the vadose zone groundwater interface to evaluate the presence of PFAS compounds in soil.

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ANG Response: The soil borings are proposed to be completed up to a maximum depth of 15 ft to allow characterization of lithology and sampling of surface and near-surface soils for PFAS. Based on suspected handling and application of AFFF at the ground surface, it is anticipated that the impacts to soils would be most prevalent in the upper 15 ft of soil, particularly the 0 to 2-ft interval. If PFAS impacts are identified in the deeper soil sample (e.g., 13-15 ft), additional sampling deeper than 15 ft below grade would be considered as a follow-on phase of work. Borings for groundwater monitoring wells will extend below the water table to allow installation of monitoring well screens for groundwater sampling. The ANG understands this depth may exceed 15 ft.

4. Section 3.3.3 of the Work Plan states that the City of Westfield indicated there are no private drinking water wells within the limits of the municipal water distribution system. The Department is currently evaluating the presence and location of sensitive receptors in the vicinity of the PFAS impacted municipal wells. Based on the review of the MassDEP Search well Database, MassDEP has potentially identified a number of domestic wells that are located within a mile radius of municipal wells No.7 and No.8. This database only lists domestic well installations reported to the database by wells drillers and is not a comprehensive list of domestic wells which may exist. The Department is currently working with the City of Westfield to further evaluate the presence or absence of domestic wells which have the potential to be impacted by PFAS. The Department has also initiated an evaluation of sensitive receptors located within a mile of municipal wells No. 1 and No. 2.

ANG Response: The work plan will be updated to reflect the potential for private water supplies within the limits of the municipal water distribution system. It will be noted that work by MassDEP is ongoing to identify potential supply wells with the potential to be impacted by PFAS.

5. The point of contact for this issue is Mr. John Richardson, Base Environmental Coordinator (413) 568-9151, extension 6981710, or email john.w.richardson78.civ@mail.mil.



JAMES M. SUHR, Colonel, MA ANG
Commander

Attachments:

1. Figure 3 - Barnes Proposed Sample Locations
2. Figure 3B - PRL 5-6
3. Figure 3C - PRL 7-8

Cc: NGB/A4OR w/o atch