



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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June 23, 2017

Robert Simeone
Department of the Army
Base Realignment and Closure Division
U.S. Army Garrison Fort Devens
30 Quebec Street, Unit 100
Devens, MA 01434-4479

Re: Army Response to EPA Comments (dated 25 May 2017) on the Army's 16 May 2017 Response to Comments and proposed Final Base-Wide Preliminary Assessment (PA) for Evaluation of Perfluoroalkyl Substances (PFAS)
Former Fort Devens Army Installation, BRAC Legacy Sites
June 2017

Dear Mr. Simeone:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above-referenced document and associated additions to Appendices, transmitted via email on June 16, 2017. Army's transmittal, along with other versions of the Base-Wide PA for PFAS, associated comments/responses, and updated interview information, has brought forth additional information regarding potential PFAS source areas. This letter documents issues that remain of concern to EPA.

EPA, within its May 25, 2017 comments, asked very specific questions regarding Army's operation of a base-wide fire station and the storage of AFFF that was used in the Building T-1445 (SA 75) warehouse fire that occurred in the late 1980s/early 1990s. The response indicated that Army did operate a fire station at 182 Jackson Road, the same location that the Devens Fire Department has operated since Army transferred the land to MassDevelopment. Army further stated that "No information has been identified about potential historical AFFF storage at the Jackson Road Fire Department" and "the past storage area for the foam used to extinguish the historical fire at the Building T-1445 Warehouse is not known".

Because PFAS has been detected at other Federal Facility fire stations due to storage and use of AFFF (including flushing of fire hoses), and given that there is no available information regarding historic use, storage and/or release of PFAS at this location, EPA considers the Fire Department a potential PFAS source area until sufficient evidence can be provided to support a no further action decision. In accordance with Paragraph 6.5 of the Devens FFA, EPA requests that Army include the Jackson Road Fire Department as a Potential Source Area in the PA Report and issue an Amendment to the Final Expedited Site Inspection Work Plan for PFAS, dated May 2017, proposing the collection of soil and groundwater from temporary well locations at 182 Jackson Road.

EPA also requests that the Base-Wide PA Report be amended to address potential PFAS releases associated with historic (Army) and current (Devens) fire department-related activities at this location. Army proposed language for the PA Report in a new section titled "Other Potential PFAS Source Areas (non-Army)". Within this section, information on the current storage of AFFF by the Devens Fire Department, located at 182 Jackson Road, and the use of AFFF on a fire at the Devens Recycling Facility in 2015 was provided, along with a statement that the "AFFF used since 1996 is "National Foam" which does not contain PFOS/PFOA. A copy of the MSDS is included in Appendix B". The MSDS list of ingredients includes a "Fluoroalkyl Surfactant" with a "Confidential" CAS number. EPA recommends Army note this in the text of the report, and further clarify that operations prior to 1996 will be investigated.

In the interest of expediting completion of this document, EPA is available to have a conference call to discuss the comments and provide clarification.

Should you have any questions or concerns in the regards to the above, please contact Laurie O'Connor at (617) 918-1605, Carol Keating at (617) 918-1393 or me at (617) 918-1273.

Sincerely,



Anni Loughlin, Chief
Federal Facilities Superfund Section
Office of Site Remediation and Restoration

Attachment

cc: Mary Spinner, Ayer Board of Health
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