

June 16, 2017

Mr. Robert Simeone
BRAC Environmental Office
Unit 100 Room 334
30 Quebec Street
Ayer, Massachusetts 01432-4429

Re: Comments on AOC 50 Draft Long-Term Monitoring and Maintenance Plan (LTMP)
Former Fort Devens Army Installation, Devens, Massachusetts

Dear Mr. Simeone:

On behalf of People of Ayer Concerned about the Environment (PACE), Engineering & Consulting Resources, Inc. (ECR) prepared the following comments on the above-referenced document prepared by KOMAN Government Solutions, LLC of Westboro, MA (KGS).

- Section 4.0, first paragraph. Please provide an entry in the "References" section for the EPA *Environmental and Field Sampling Handbook*. Because that document could not be located on-line, any assistance in obtaining a copy would be appreciated.
- Section 4.4, Sample Collection. The LTMP states that all samples for metals analysis will be filtered using a 0.45 micron filter. It is well-documented that use of a 0.45 micron filter removes colloids that are mobile in groundwater.¹ Because the metals data will be used to evaluate the generation of mobile metals in groundwater, the collection of both filtered and unfiltered samples would provide more reliable information. EPA's 2010 Low-Flow Sampling Standard Operating Procedure (SOP), which is referenced in the LTMP, states "'filtered water samples are not an acceptable substitute for unfiltered samples when the monitoring objective is to obtain chemical concentrations of total mobile contaminants in groundwater for human health or ecological risk calculations.'"² At a minimum, it would be preferable to omit filtering for samples where the final turbidity reading is less than 5 NTU as recommended by EPA's Science Advisory Board.³ A groundwater sample collected consistent with EPA's low-flow sampling procedure and with a turbidity of less than 5 NTU should provide an adequate representation of mobile metals content.
- Section 4.5.2, Chain of Custody. In the third item in the bulleted list, it appears that "and" should be changed to "or."

1 Puls and Barcelona, *Ground Water Sampling for Metals Analysis*, Superfund Ground Water Issue, US EPA, March 1989, and EPA Science Advisory Board (SAB), Environmental Engineering Committee (EEC), Special Topics Subcommittee, *To Filter or not to Filter, that is the question*, September 15, 1997.

2 US EPA, 2010, *Low Stress Purging and Sampling Procedure for the Collection of Groundwater Samples from Monitoring Wells*, EPA Region 1, January 19, 2010.

3 SAB EEC 1997.

- Section 4.6.5, Reporting. Please add text to state that the Annual Reports will include discussion of the data obtained; identification of any issues, concerns or problems encountered; and the status of progress toward attainment of remedial objectives.
- It is recommended that a new monitoring well be placed down-gradient of Area 5, between wells G6M-13-02X and G6M-97-05B. These wells currently exhibit the highest remaining tetrachloroethylene (PCE) concentrations in the down-gradient area; however, they are relatively distant from each other, raising the possibility that elevated concentrations may exist in the area between these wells.

PACE and ECR appreciate the opportunity to provide comment on this document, and we look forward to the Army's response. Please feel free to contact me at (978) 500-3199 if you have any questions or comments regarding this letter.

Sincerely,
Engineering & Consulting Resources, Inc.

REDoherty

Richard E. Doherty, P.E., L.S.P.
President

cc: Ms. Carol Keating, USEPA
Mr. David Chaffin, MassDEP
Ms. Pamela Harting-Barrat, USEPA
Ayer Board of Health
Ayer Board of Selectmen
Mr. Robert Pontbriand, Ayer Town Administrator
Mr. Mark Wetzel, Ayer DPW
Ms. Julie Corenzwit, PACE
Ms. Laurie Nehring, PACE