



**United States Environmental Protection Agency**  
**Region 1**  
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Date: See signature stamp below

Matthew Greenberg  
Remedial Project Manager  
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Via e-mail to [matthew.greenberg.2@us.af.mil](mailto:matthew.greenberg.2@us.af.mil)

RE: *Final PFAS Site Inspection Addendum Report*  
Hanscom Field/Hanscom Air Force Base Superfund Site

Dear Mr. Greenberg:

EPA has received the *Final PFAS Site Inspection Addendum Report, Hanscom Air Force Base, MA*, dated September 29, 2022 (the Report). While EPA agrees with the recommendation to proceed to a Remedial Investigation, we would like to reiterate the following points:

- Regarding EPA general comment 1: There is no discussion in the Report regarding the May 2014 plane crash that occurred at the end of the runway and into the Shawsheen River, despite the use of AFFF foam in the response to the plane crash, or the September 2021 release of AFFF to the storm drain/Shawsheen outfall during a fire training accident. Air Force is strongly encouraged to coordinate their investigative efforts with MassPort. Regardless of liability, the presence of PFAS presents a threat to human health and safety, especially in nearby drinking water resources. If these events are excluded from the RI, it will not be possible to confidently determine the nature and extent of PFAS contamination at the site.
- Regarding EPA general comment 7: As written, the Report is inconsistent with other documents pertaining to this site. In the interests of consistency with existing documentation in the administrative record, EPA requested the Report to utilize established site nomenclature and identification. Air Force replied with the following: “As discussed in the 11 July 2022 meeting with Air Force, EPA, and MassDEP representatives and stated in Air Force’s 29 July 2022 letter, the Operable Units were established for separate releases from the PFAS releases, and they are included in the FFA [sic]. Therefore, the nomenclature for the new release areas AFFF Area 1, AFFF Area 2, AFFF Area 3, and AFFF Area 4 are where AFFF releases were confirmed to have occurred, based on the Site Investigation conducted by Aerostar (2018), and they are not included in the FFA. Note also that any Site Inspection-related reporting is not included in the FFA as a primary or secondary document.” This response does not address EPA’s original comment. Air Force

should clearly reference and identify Operable Units/IRP sites, as well as identify whether the PFAS investigations will be addressed under an existing Operable Unit(s) or if it proposes to establish a new Operable Unit.

- Regarding EPA specific comment 8: Air Force claims groundwater flow direction is toward the Shawsheen River. Because MW13-3 is located on the opposite side of the river from the suspected source area, EPA's original comment is still valid – this may represent an uninvestigated source of PFAS contamination on the west side of the River. Please provide EPA with hydrologic data to justify Air Force's assumptions.
- As indicated in previous correspondence, due to the release of updated regional screening levels, all LOQs for PFAS must be sufficiently low to account for dilutions during sample analysis. EPA recommends that all reporting limits/LOQs be two to five times below the corresponding action levels to account for dilution. Going forward, please ensure the chosen laboratory is able to meet this recommendation.
- Specifically, the Report recommended an RI to assess the occurrence, distribution, and potential migration of PFAS at the site. In order to fully characterize risk to human health and the environment, these efforts, including but not limited to risk assessments, may require the consideration of other site contaminants, especially with respect to off-site migration. This should be included in the RI and any subsequent work as appropriate.
- Finally, EPA made several suggestions to ensure comprehensiveness of the RI. These items were not mentioned in the Report and include: consideration of infiltration rates and the size of drainage areas when evaluating releases to surface water; the evaluation of a fish consumption exposure pathway, including human health screening levels; and incorporation of ecological screening values for eight PFAS compounds developed by AFCEC and Argonne National Laboratory. It is EPA's expectation that these items will be included in the RI.

Please feel free to contact me at [Lowry.Shawn@epa.gov](mailto:Lowry.Shawn@epa.gov) or 617-918-1459 with any questions.

Sincerely,

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cc: Anni Loughlin, EPA  
Dave Peterson, EPA  
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