



**DEPARTMENT OF THE AIR FORCE
AIR FORCE CIVIL ENGINEER CENTER
JOINT BASE SAN ANTONIO LACKLAND TEXAS**

2 September 2020

**AFCEC/CIB
2261 Hughes Avenue, Suite 155
JBSA Lackland, TX 78236-9853**

**Mr. Michael J. Wimsatt, Director
Waste Management Division
New Hampshire Dept. of Environmental Services
PO Box 95, 29 Hazen Drive
Concord, NH 03302-0095**

**Re: PFAS AGQS Notification and Request for Compliance, Former Pease AFB, DES Site
#198404025**

Dear Mr. Wimsatt:

Thank you for your letter dated August 20, 2020 providing notice of the Maximum Contaminant Levels (MCLs) and Ambient Groundwater Quality Standards (AGQS) for four per- and polyfluoroalkyl substances (PFAS) that were signed into New Hampshire law on July 23, 2020.

The Air Force remains committed to the health and safety of our service members, their families, our civilian workforce, and the communities in which we serve. The Air Force continues to adhere to this commitment at the former Pease AFB in responding to PFAS, which includes perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA). Your letter raises a complicated issue of using the New Hampshire PFAS AGQS to trigger immediate cleanup action, and the Air Force has coordinated your request with the Office of the Secretary of Defense (OSD) to allow for consistent review and application of State standards across all affected Services.

When a state properly promulgates a PFAS drinking water standard, the Air Force adheres to that standard in any location where we are the supplier of drinking water. Where we are not the supplier of drinking water, such as at the former Pease AFB, the Air Force follows our authorities available in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), which is a Federal cleanup law. Where the Air Force is the known source, CERCLA allows the Air Force to provide bottled water, and other "removal actions" to quickly assure no one is drinking water above the U.S. Environmental Protection Agency's (EPA) PFOS/PFOA lifetime drinking water health advisories level of 70 parts per trillion (ppt).

Under CERCLA, there is an established process for evaluating if a state cleanup standard is applied at the long-term "remedial action" phase. Once the need for remedial action has been determined based on the risk assessment process, if the state standard meets the CERCLA section

121 criteria, it is incorporated into the cleanup levels that must be attained at that site. While this is a site-specific evaluation, OSD has determined that the New Hampshire MCLs and AGQS are potential “applicable or relevant and appropriate requirements” (ARARs) that should be evaluated on a site-specific basis during the CERCLA remedy selection phase.

Addressing the four points in your letter, I offer the following responses in the order provided.

1. The Air Force provides bottled water and other removal actions based on an exceedance of the EPA lifetime health advisory (lifetime HA) for PFOS and PFOA in drinking water. This is consistent with the USEPA “*Interim Recommendations to Address Groundwater Contaminated with Perfluorooctanoic Acid and Perfluorooctanesulfonate*” issued December 19, 2019. Bottled water will not be provided based on the New Hampshire AGQS levels. We also note that current short-term response efforts are being conducted pursuant to the Environmental Protection Agency’s Safe Drinking Water Act order at Pease.
2. Private water wells will also be evaluated for permanent drinking water mitigation (e.g., connection to the municipal supply system, or installation of an appropriate point-of-entry treatment system) should the drinking water exceed the EPA PFOS and/or PFOA HA level of 70 ppt.
3. The Air Force will evaluate all identified state ARARs as part of identifying remedial options during the PFAS feasibility study at Pease.
4. The Air Force recognizes the AGQS as treatment standards for water re-injected into the Pease aquifer.

We look forward to your continued cooperation that has helped make the PFOS/PFOA response successful to date.

Sincerely,



STEPHEN G. TERMAATH, GS-15, DAF
Chief, BRAC Program Management Division
Installations Directorate