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NSY PORTSMOUTH
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EMAIL AND THE U S EPA REGION I COMMENTS ON THE DRAFT TECHNICAL
MEMORANDUM ON PERFLUORINATED COMPOUND USE ASSESSMENT NSY
PORTSMOUTH ME
12/15/2014
U S EPA REGION I BOSTON MA

Dombrowski, Paul (Wakefield)

From: Audet, Matthew <Audet.Matthew@epa.gov>
Sent: Monday, December 15, 2014 10:55 AM
To: Dombrowski, Paul (Wakefield); McLeod, Iver J
Cc: Cole, Linda L CIV NAVFAC MIDLANT, IPTNE; 'Thyng, Frederick M CIV NAVFAC MIDLANT, PWD Maine' (frederick.thyng@navy.mil); Hildreth, Gary R CIV PORTS, 100PAO
Subject: RE: Portsmouth Naval Shipyard: Technical Memorandum on Perfluorinated Compound Use Assessment (WE05)

Linda -

Due to the likely presence of PFCs in the landfill, there is a potential concern for leaching of PFCs into the saline groundwater as the tides enter and leave the subsurface under the landfill. If PFCs enter the groundwater they may be transported to the marine environment where they may have toxic effects on aquatic organisms and bioaccumulate into aquatic organisms such as fish, lobster and other invertebrates that may be eaten by humans and wildlife.

Although it is likely that any leaching PFCs will be rapidly diluted in the river, the potential for leaching should be documented by conducting at least one round of sampling and PFC analysis of groundwater from representative monitoring wells installed in the landfill, with coverage focused on wells which are closest to the river and which cover as much of the periphery of the landfill as practicable.

The analytical method should be a combination of liquid chromatography and tandem mass spectrometry (LC-MS-MS) similar to EPA 537 Rev. 1.1 LC-MS-MS with detection limits of 20 ng/L for PFOS and 40 ng/L for PFOA, as recommended by "Interim Air Force Guidance On Sampling and Response Actions for Perfluorinated Compounds of Active and BRAC Installations, 27 August 2012". Per this guidance, analysis for six PFCs (PFOS, PFHXS, PFOA, PFHPA, PFNA, PFBS) should be performed by laboratories accredited for PFC analysis under the DoD Environmental Accreditation Program (ELAP) in accordance with guidance developed by the DoD Environmental Data Quality Workgroup (EDQW) and supported with appropriate quality assurance and quality control measures.

Samples should be collected during ebb tide when saline groundwater has had the longest period of contact with subsurface materials. A subset of the groundwater samples should be analyzed for both total and dissolved PFCs to help evaluate the potential for migration in the subsurface. - mra

From: Dombrowski, Paul (Wakefield) [<mailto:Paul.Dombrowski2@aecom.com>]
Sent: Wednesday, September 17, 2014 3:22 PM
To: Audet, Matthew; McLeod, Iver J
Cc: Cole, Linda L CIV NAVFAC MIDLANT, IPTNE; 'Thyng, Frederick M CIV NAVFAC MIDLANT, PWD Maine' (frederick.thyng@navy.mil); Hildreth, Gary R CIV PORTS, 100PAO
Subject: Portsmouth Naval Shipyard: Technical Memorandum on Perfluorinated Compound Use Assessment (WE05)

Hello Matt and Iver

On behalf of the Navy, please find attached the electronic copy of the draft Technical Memorandum: Perfluorinated Compound Use Assessment for the Portsmouth Naval Shipyard. Hardcopies have also been mailed for review to USEPA and MEDEP, 2 and 3 copies respectively. If there are questions about the attached, please contact Linda Cole.

Thank you
Paul

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