



DEPARTMENT OF THE AIR FORCE
AIR FORCE CIVIL ENGINEER CENTER
Environmental Management Directorate

22 February 2021

Mr. Jeffrey P. Domm
Director, Environmental Management
Air Force Civil Engineer Center
2261 Hughes Ave.
JBSA Lackland, TX 7826-9853

Mr. Paul W. Locke
Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs
Department of Environmental Protection
One Winter Street
Boston, MA 02108

Dear Mr. Locke:

Thank you for your letter dated 28 October 2020 where the Massachusetts Department of Environmental Protection (MassDEP) requests the Air Force use the recently promulgated six Per- and Polyfluoroalkyl Substances (PFAS6) Massachusetts Maximum Contaminant Level (MMCL) as an Applicable or Relevant and Appropriate Requirement (ARAR) for groundwater response actions at Joint Base Cape Cod (JBCC).

When a state promulgates a per- and polyfluoroalkyl substances (PFAS) drinking water standard, DoD adheres to the standard in that state where we are the supplier of drinking water under the Safe Drinking Water Act. DoD also follows the federal cleanup law, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), to respond to PFAS releases to the environment where DoD is the known source. Consistent with EPA Perfluorooctanesulfonic acid (PFOS) and Perfluorooctanoic acid (PFOA) guidance, DoD provides bottled water, filter systems, and other CERCLA removal actions to quickly assure no one is drinking water above the EPA PFOS/PFOA lifetime Health Advisories (HAs) level. CERCLA also describes how more stringent state standards are incorporated into the cleanup process as final cleanup standards, referred to as ARARs. Once the need for a CERCLA remedial action has been determined, then federal and state promulgated standards are evaluated as ARARs on a site-specific basis during the Feasibility Study phase. As requested, the Air Force will include the PFAS6 MMCL in the site-specific ARAR evaluation for groundwater at JBCC, consistent with CERCLA section 121 and CERCLA regulations.

At JBCC, the Air Force has ensured that no one is drinking water with concentrations of PFOS and PFOA above EPA HAs from Air Force activities, including performing a number of removal actions for off base drinking water. This is consistent with the CERCLA risk-based process that is used nationwide to determine if a response is required, EPA's "Interim Recommendations to Address Groundwater Contaminated with PFOA and PFOS", and a determination by EPA Region 1

Regional Administrator Deziel in a November 10, 2020 letter that an early or interim action for PFOS/PFOA is not warranted under CERCLA unless the PFOS/PFOA HAs level are exceeded.

Thank you again for your letter and for recognizing the efforts by the JBCC Installation Restoration Program staff to date. We appreciate the continued partnership with MassDEP. We remain committed to protecting human health and the environment at JBCC and the surrounding community, and look forward to continued collaboration with stakeholders on PFOS/PFOA actions. If you would like to discuss this issue further, please contact me at (210) 395-8363, email jeffrey.domm@us.af.mil.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey Domm". The signature is written in a cursive style with a large, stylized initial "J".

JEFFREY P. DOMM, GS-15, DAF
Director, Environmental Management