

NOTES & SOURCES: Basemap data from US Geological Survey 7 1/2 minute Topographic Maps. Source: MassGIS

# DRAFT

AMEC Earth & Environmental, Inc. Westford, Massachusetts

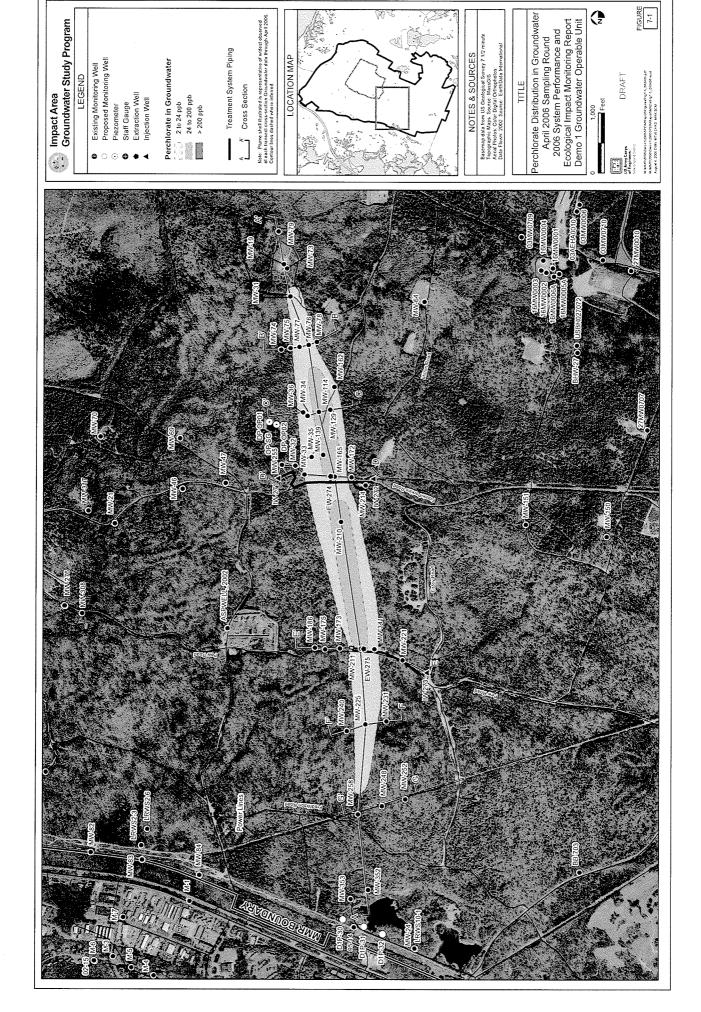
J:\Demo 1\GW\Decision Document\MMR-9934 Figs. & Tables RCL Decision Document\D9934. Fig1.pdf G:\MMR\_COE\work2008\D9934\D9934\_Fig1.mxd January 12, 2005 DWN: JBB AP CHKD: BK

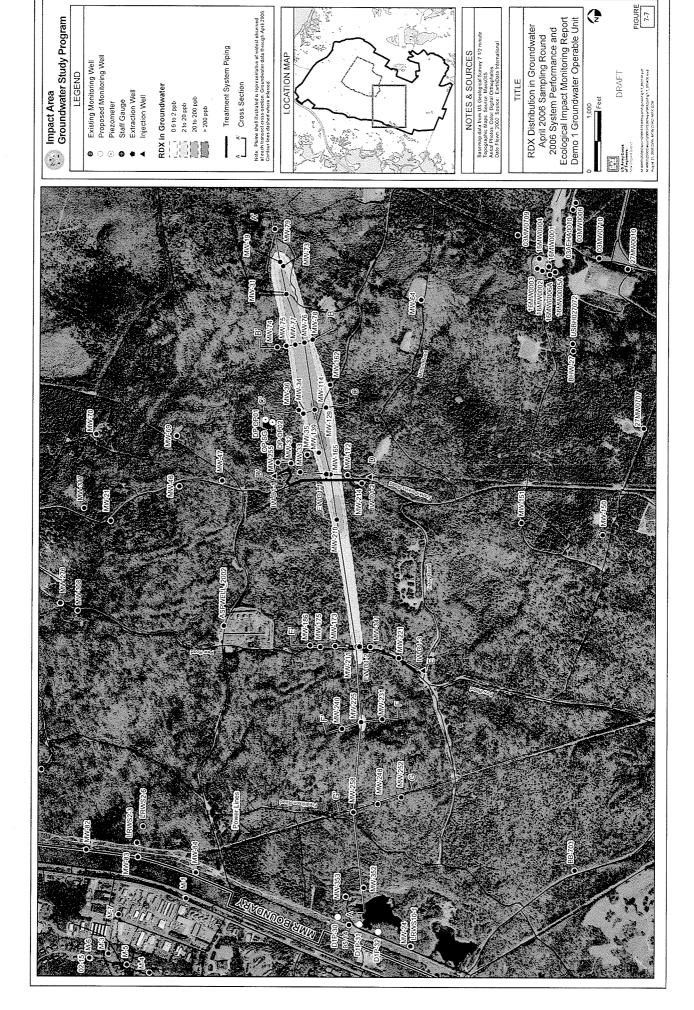
Location of Demo 1 Massachusetts Military Reservation **Decision Document** Demo 1 Groundwater OU

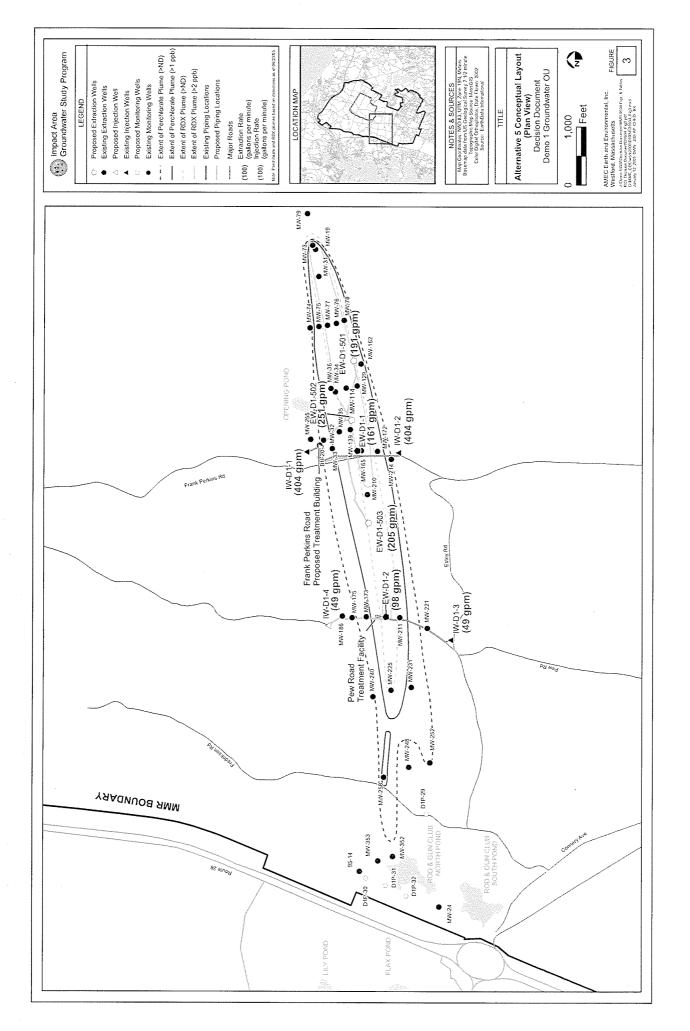


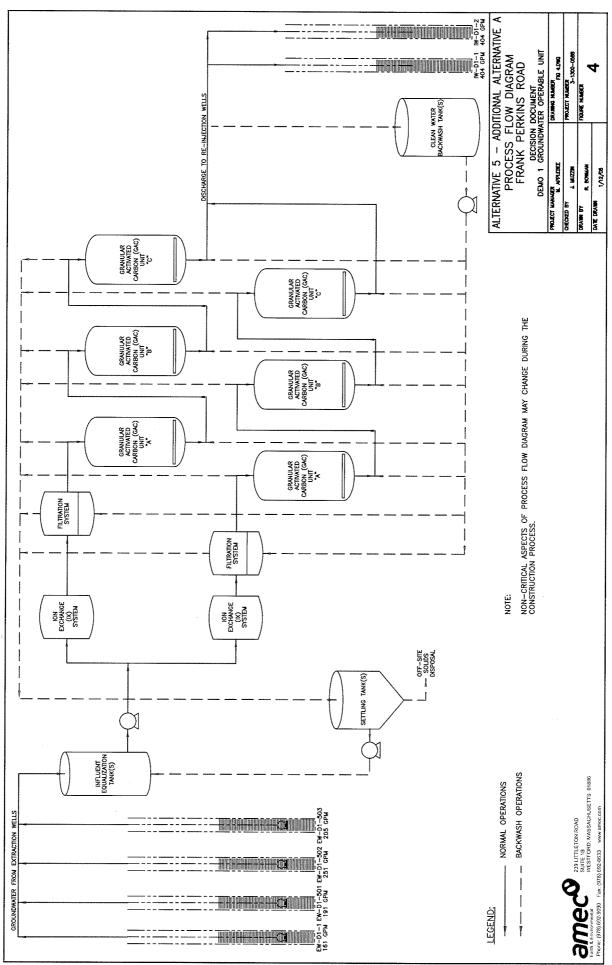
**Groundwater Study Program** 

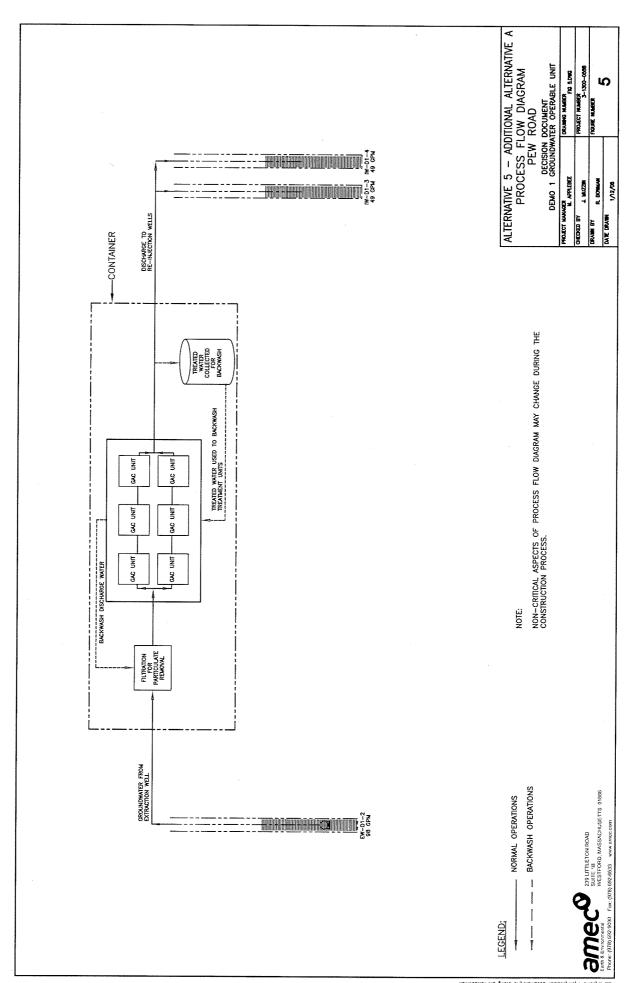
**FIGURE** 



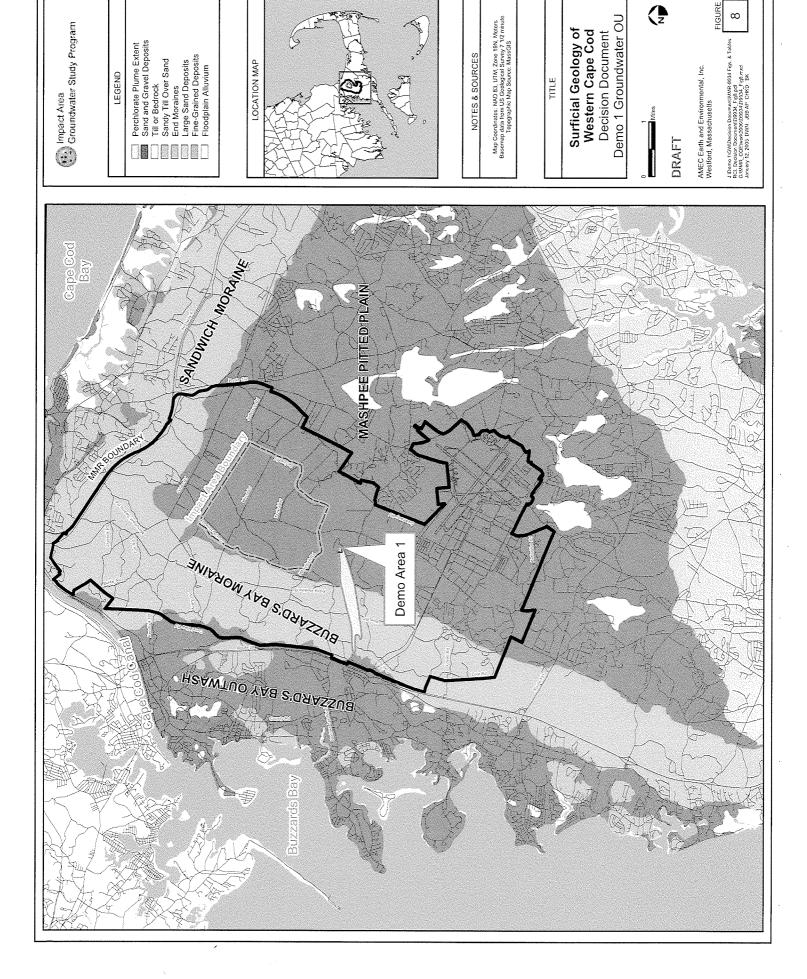












# APPENDIX A MassDEP Letter of Concurrence



MITT ROMNEY Governor

KERRY HEALEY Lieutenant Governor

COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS DEPARTMENT OF ENVIRONMENTAL PROTECTION SOUTHEAST REGIONAL OFFICE

20 RIVERSIDE DRIVE, LAKEVILLE, MA 02347 508-946-2700

ROBERT W. GOLLEDGE, Jr. Secretary

> ARLEEN O'DONNELL Commissioner

September 26, 2006

RE:

Ms. Susan Studlien Office of Site Remediation and Restoration U.S. Environmental Protection Agency. Region 1 One Congress Street, Suite 1100 Boston, Massachusetts 02114-2023

BOURNE—BWSC-4-0037

Massachusetts Military Reservation. Decision Document, Demolition Area 1 Groundwater Operable Unit, Concurrence

Dear Ms. Studlien:

The Massachusetts Department of Environmental Protection (the "MassDEP") has reviewed the document entitled "Decision Document, Demolition Area 1 Groundwater Operable Unit" (the "Demo-1 DD"), dated September 14, 2006. The Demo-1 DD presents the response action selected by the U.S. Environmental Protection Agency (USEPA) for the Demolition Area 1 groundwater operable unit, located on Camp Edwards at the Massachusetts Military Reservation (MMR), situated in Bourne, Cape Cod, Massachusetts. The response action was selected by the USEPA in accordance with Section 1431(a) of the Safe Drinking Water Act (SDWA) and USEPA Administrative Order No. SDWA-1-2000-0014 (AO3). In addition, the selected response action includes consideration of the clean up standards set forth under Massachusetts General Laws, M.G.L. c. 21E and 310 CMR 40.0000, the Massachusetts Contingency Plan (MCP). For the following reasons, the MassDEP concurs with the response action proposed in the Demo-1 DD.

# Demolition Area-1 Source Area:

The source of the Demo-1 groundwater plume is an approximately 7.4 acre site located at Camp Edwards. This site was used from the mid 1970s to the late 1980s by the military for the destruction of munitions, demolition training and the destruction of various types of military ordnance using explosives. The predominant explosive compound used in munitions at the site is Royal Demolition Explosive (RDX), followed by 2,4,6 trinitrotoluene (TNT). Perchlorate, a water-soluble salt used as an oxidizer, is a component of some munitions, fireworks, rocket propellants, and pyrotechnics that were likely destroyed at Demolition Area 1. In 2005, Army/NGB performed a Rapid Response Action (RRA) to remove contaminated soil from the

source area of the Demo 1 groundwater plume. Soil was treated on-site by thermal desorption, which uses heat to separate contaminants from the soil and oxidize them. Approximately 27,000 tons of soil was excavated and treated or disposed of off-site.

# Demolition Area-1 Groundwater Operable Unit:

The contaminants of concern (COCs) for the Demolition Area 1 groundwater operable unit include the explosive compounds RDX and TNT, and the propellants 2,4-dinitrotoluene (2,4-DNT), and perchlorate. Detections of RDX in the Demo 1 plume have ranged from the detection limit of 0.25 parts per billion (ppb) to 370 ppb. The lifetime federal health advisory (HA) for RDX in drinking water is 2 ppb. Perchlorate detections have ranged from the detection limit of 0.35 ppb to 500 ppb. The Massachusetts Maximum Contaminant Level (MMCL) and MCP Groundwater 1 (GW-1) standard for perchlorate is 2 ppb.

The Army/NGB performed a groundwater RRA in September of 2004 that was designed to remove contaminants from the aquifer and limit further migration of the plume while the comprehensive remedy could be selected and implemented. The groundwater RRA consists of two groundwater extraction wells, one at Frank Perkins Road and the other at Pew Road. Groundwater is pumped from these wells at 320 gallons per minute (gpm) to modular treatment units. The extracted groundwater is then treated with a combination of granular activated carbon (GAC) and ion exchange resin (IX) and returned to the aquifer via three reinjection wells.

The selected remedy for the Demolition Area 1 groundwater operable unit will be performed by the United States Army/National Guard Bureau (Army/NGB) and builds upon the existing RRA groundwater extraction, treatment, and reinjection (ETR) system. Groundwater modeling performed by the Army/NGB predicts that the proposed remedy will prevent significant further migration of the plume and restore the impacted portion of the aquifer for use as a public water supply, which has been designated a Sole Source Aquifer by the USEPA and a Potentially Productive Aquifer by the MassDEP. The response action will also remediate the contaminated groundwater containing RDX at concentrations greater than the  $10^{-6}$  risk-based level (0.6 ppb) and perchlorate greater than the MMCL/GW-1 of 2 ppb.

As part of the selected remedy, Army/NGB will install three additional extraction wells to the existing RRA treatment system, for a total of five wells that will extract contaminated groundwater at 906 gpm. Groundwater will be treated to remove contaminants to below applicable federal and state drinking water standards and risk-based levels using GAC and IX. The treated water will be re-injected back into the aquifer using four injection wells.

The selected remedy relies on natural attenuation of the leading edge of the plume (located beyond the well furthest downgradient from the source area) to below applicable water-quality standards and risk-based levels. In addition, the Army/NGB will perform long-term monitoring through a network of approximately 103 groundwater monitoring well screens to track the extent and movement of the plume. Groundwater modeling predicts this remedy will prevent significant further migration of the plume and restore the impacted portion of the aquifer for use as a public water supply. However, the selected remedy also includes a contingency remedy for additional active measures to be taken to control migration of the plume if

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contaminants migrate further than predicted by groundwater modeling performed by the Army/NGB. This contingency remedy will most likely include additional groundwater extraction and treatment near the leading edge of the plume if actual or modeled data at a well transect west of North Pond exceeds applicable federal/state regulatory or risk-based levels for COCs.

Furthermore, under the selected remedy, Army/NGB will implement administrative and/or legal controls known as land use controls (LUCs) to prevent access to or use of the groundwater from the Demo-1 plume until the groundwater no longer poses an unacceptable risk to human health. The Army/NGB will also annually monitor the environmental use restrictions and controls.

Based on the foregoing, the MassDEP concurs with the selected response action proposed in the Demo-1 DD. This concurrence is based upon representations made to the MassDEP by the Army/NGB and assumes that all information provided is substantially complete and accurate. Without limitation, if the MassDEP determines that any material omissions or misstatements exist, if new information becomes available, or if conditions at the Demo-1 groundwater operable unit change, resulting in potential or actual human exposure or threats to the environment, the MassDEP reserves its authority under M.G.L. c. 21E, and the MCP, 310 CMR 40.0000 et seq., and any other applicable law or regulation to require further response actions.

In addition, please be advised that the MassDEP reserves all rights against the Army/NGB and all other persons to take any civil, criminal, or administrative enforcement action pursuant to any available legal authority, including the right to seek injunctive relief; the recovery of money expended or to be expended (plus interest); monetary penalties; criminal sanctions; and/or punitive damages regarding any violation of M.G.L. c. 21E and the MCP, or any actual or potential threat to human health, safety, public welfare or the environment, or any release of hazardous substances on, at, in, or near the MMR. Nothing in this letter shall preclude the MassDEP from taking any additional enforcement actions, including the issuance of Orders and/or additional actions, as the MassDEP may deem necessary, or from requiring the Army/NGB in the future to perform additional activities pursuant to any other applicable law.

Please incorporate this letter into the Administrative Record for the Demo-1 groundwater operable unit. If you have any questions regarding this matter, please contact Leonard J. Pinaud, Chief of Federal Facilities Remediation Section, at (508) 946-2871 or Millie Garcia-Surette, Deputy Regional Director of the Bureau of Waste Site Cleanup at (508) 946-2727.

Sincerely,

Sold Arleen O'Donnell

Acting Commissioner

Massachusetts Department of Environmental

Protection

AO/LP/

Demolition Area 1 DD concurrence letter

Cc: DEP - SERO

Attn:

Gary S. Moran, Regional Director

Millie Garcia-Surette, Deputy Regional Director, BWSC

Leonard J. Pinaud, Chief, Federal Facilities Remediation Section, BWSC

Distributions: SERO

**SMB** 

Plume Cleanup Team (IRP)

Boards of Selectmen Boards of Health

Mark Begley, Environmental Management Commission

# APPENDIX B REFERENCES

# APPENDIX B -- DEMOLITION AREA 1 REFERENCES

<u>Name</u>	<b>Creation Date</b>	Type	<b>Boc ID</b>
Memorandum of Resolution on the 2005 System Performance and Ecological Monitoring (SPEIM) Report Rapid Response Action (RRA) Demo 1 Groundwater Operable Unit	14-Mar-06	Letter	8471
Demolition Area 1 Soil Rapid Response Action and Soil Operable Unit Closeout Report	21-Dec-05	Report	8405
Remedial Design-Demo 1 Groundwater Operable Unit, Frank Perkins Treatment Fac., Concurrence	7-Dec-05	Letter	8433
Final Completion of Work Report Rapid Response Action Systems Demo 1 Groundwater Operable Unit	4-Nov-05	Report	8348
Demo 1 Groundwater Operable Unit, Remedial Design Documents	2-Nov-05	Letter	8440
Draft 2005 System Performance and Ecological Impact Monitoring (SPEIM) Report	28-Oct-05	Report	8345
Memorandum of Resolution, Remedial Design Work Plan, Remedial Action, Demo 1 Groundwater Operable Unit	26-Oct-05	Letter	8337
<u>Draft Completion of Work Report, RRA System, Demo 1 GW Operable Unit, Response to Comments, Concurrence</u>	13-Oct-05	Letter	8401
Remedy Selection Plan for the Demolition Area 1 Groundwater Plume	22-Aug-05	Plan	8288
Final Technical Team Memorandum 01-17 Feasibility Study Demo 1 Groundwater Operable Unit	19-Aug-05	Report	8285
Response to EPA Comments (08/09/05) on the Revised Memorandum of Resolution (07/11/05) to the Revised Draft System Feasibility Study, Technical Memorandum (TM) 01-17, Demo 1 Groundwater Operable Unit	10-Aug-05	Letter	8289
Response to Comments on the Completion of Work Report, Rapid Response Action Systems, Demo 1 Groundwater Operable Unit	3-Aug-05	Letter	8284
Revised Memorandum of Resolution on the Revised Draft Feasibility Study, Technical Memorandum (TM) 01-17 Demo 1 Groundwater Operable Unit	11-Jul-05	Letter	8273
Final System Performance and Ecological Impact Monitoring (SPEIM) Plan Rapid Response Action	6-Jan-05	Plan	8095
Remedial Action, Demo 1 Groundwater Operable Unit, approval of RCL	1-Dec-04	Letter	8434
iveriorandum of Resolution System Performance and Ecological Impact Monitoring Plan, Rapid Response. Action Systems, Demo 1 Groundwter Operable Unit	30-Nov-04	Letter	7969
Final Groundwater Report Addendum to Technical Team Memorandum 01-2 Demo 1 Groundwater	21-Apr-04	Report	5852
Operable Unit MADEP Concurrence with the Memorandum of Resolution for the Draft Groundwater Report Addendum to	7-Apr-04	Letter	6195
<u>Technical Memorandum 01-2, Demo 1 Groundwater Operable Unit</u> <u>M</u> emorandum of Resolution for the Draft Rapid Response Action Plan Demolition Area 1 (Demo 1)	2-Anr-04	 	7038
Groundwater Operable Unit	5		2
Demo 1 Groundwater Operable Unit	23-Feb-04	Letter	6196
Response to Comment Letter on the Rapid Response Action Plan Demo 1 Groundwater Operable Unit	6-Nov-03	Letter	4723

<u>DEP comments to the Draft appendix E, Sampling and Analysis plan - Demo 1, Response to comments, Concurrence</u>	4-Nov-03	Letter	5382
Bourne-BWSC-4-15031 Massachusetts Military Reservation, Rapid Response Action, Demo-1 Groundwater Operable Unit Comments/Approval	23-Sep-03	Letter	5475
EPA Conditional Approval with Required Modifications of the Revised Draft Rapid Response Action (RRA) Plan, Demolition Area 1 Groundwater Operable Unit	2-Sep-03	Letter	5476
pera	6-May-03	Letter	5044
Abatement Measure Plan, demolition area 1 Groundwater Operable Unit	-reb-03	Letter	5356
Draft Rapid Response Action / Release Abatement Measure (RRA/RAM) Plan, Demo 1 Groundwater Onerable Unit	21-Jan-03	Plan	4015
DEP comments on the Draft technical team Memorandum 01-17, Feasibility study report, Demo 1	7-May-02	Letter	6205
groundwater operable unit - MOH, Concurrence MON for the Draft Technical Team Memorandum 01-17, Feasibility Study Report, Demo 1 Goundwater	2-May-02	Letter	6043
Operable Unit Response to Comments on the Draft IAGWSP Technical Team Memorandum 01-17 Ecosibility Study		; ;	000
	10-pec-01	reller	6003
MADEP Comments on the Draft Technical Team Memorandum 01-17 Feasibility Study Report, Demo 1	20-Nov-01	Letter	6064
Groundwater Operable Unit <u>USEPA region I Administrative Orders SDWA 1-97-1019 &amp; 1-2000-001 BOURNE -BWSC-4-13683 Camp</u>	16-Nov-01	letter	5046
study program Delinea			2
demo 1 groundwater operable unit Draft IAGWSP Technical Team Memorandum 01-17, Feasibility Study Report, Demo 1 Operable	31-Oct-01	l etter	6065
Groundwater Unit, Administrative Order SDWA 1-2000-0014	; ; ; ;		
Revision to Transport Modeling Simulations in the Draft IAGWSP Technical Team Memorandum 01-17 Feasibility Study Report Demo 1 Groundwater Onerable Unit	26-Oct-01	Letter	9909
Tech Team Memo 01-17 Draft Feasibility Study Report, Demo 1Groundwater Operable Unit	1-Oct-01	Report	828
Memorandum of Resolution for the Draft Contaminant of Concern Identification, Demo Area 1	10-May-01	Letter	5204
Letter with the Final Technical Team Memorandum 01-2, Demo 1 Groundwater Report	19-Apr-01	Letter	6200
IAGWSP Technical Leam Memorandum 01-2 Demo 1 Groundwater Report	19-Apr-01	Report	3924
Impact Area Groundwater Study MOH for the Draft IAGWSP Technical Team Memorandum 01-5. Development and initial screening of alternatives report. Demo 1	12-Apr-01	Letter	6154
Memorandum of Resolution for the Draft IAGWSP Technical Team Memorandum 01-2, Demo 1	21-Mar-01	Letter	6179
Groundwater Report			
INGS TECHNICAL LEARN MEMORANDUM 01-5 DEVELOPMENT AND INITIAL SCREENING OF Alternatives Report Draft TM 01-2, Demo 1 GW Report	31-Jan-01 18-Jan-01	Report	2753 666
COC Identification, Demo 1 - Groundwater Operable Unit	5-Dec-00	Report	664
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# APPENDIX C GLOSSARY OF TERMS AND ACRONYMS

# APPENDIX C GLOSSARY OF TERMS AND ACRONYMS

2A-DNT 2-amino-4,6-dinitrotoluene, a breakdown product of the explosive TNT

4A-DNT 4-amino-2,6-dinitrotoluene, a breakdown product of the explosive TNT

2,4-DNT 2,4-dinitrotoluene, a propellant

AFCEE U.S. Air Force Center for Environmental Excellence

AO Administrative Order

AOC Area of Concern

Background A background level is the concentration of a hazardous substance that

represents the level of the substance in an undisturbed environmental setting at

or near the site.

BBM Buzzards Bay Moraine

CERCLA Comprehensive Environmental Response Compensation and Liability Act

COC Contaminant of Concern

DD Decision Document; summarizes the selected comprehensive remedy

Demo 1 Demolition Area 1

DWEL Drinking Water Equivalent Level

EPA United States Environmental Protection Agency

EPS Environmental Performance Standards

ETR Extraction/Treatment/Reinjection

EW-D1-X Extraction Well at Demo 1 where X is replaced by the well number

FS Feasibility Study

ft feet

GAC Granular Activated Carbon; used in the treatment of contaminated water

gpm gallons per minute; unit of measure for liquid flow per unit time

HA Health Advisory; EPA guidelines that represent the concentration of a chemical in

drinking water that, given a lifetime of exposure, is not expected to cause

adverse, non-cancerous, effects.

HMX Octahydro-1,3,5,7-tetranitro-1,3,5,7-tetrazocine, an explosives compound

IAGWSP Impact Area Groundwater Study Program

IART Impact Area Review Team

IRP Installation Restoration Program

IW-D1-X Injection Well at Demo 1 where X is replaced by the well number

IX Ion exchange resin; used in the treatment of contaminated Water

kettle hole a depression that in the ground surface that was formed during the last ice age

from the melting of a remnant glacial ice block

kg kilogram; unit of measure for mass

Lifetime Health Advisory Guideline established by EPA that represents the concentration of

a chemical in drinking water that, given a lifetime of exposure, is not expected to

cause adverse, non-cancerous effects

LUC Land Use Control

lb pound; unit of measure for weight

MassDEP Massachusetts Department of Environmental Protection

MANG Massachusetts National Guard

mg milligram; unit of measure for mass

mg/kg/day milligram of substance per kilogram of bodyweight per day of consumption

MCL Maximum Contaminant Level

MMR Massachusetts Military Reservation

NCP National Contingency Plan

NEPA National Environmental Policy Act

OU Operable Unit

O&M Operation and Maintenance

oxidizer A substance that gives up oxygen easily to stimulate combustion of organic

material

# Appendix C Glossary of Terms and Acronyms Decision Document Demo 1 Groundwater OU

Massachusetts Military Reservation September 15, 2006

Page 2 of 3

perchlorate A water-soluble salt used as an oxidizer ppb parts per billion, a measure of concentration in liquid, e.g. one part of contaminant in one billion parts of water is 1 ppb, or 1 microgram per liter RDX Hexahydro-1,3,5-trinitro-1,3,5-triazine / Royal Demolition Explosive, an explosive compound **RRA** Rapid Response Action, an interim cleanup action taken to reduce contamination while the investigation and selection, design and implementation of a comprehensive cleanup plan is completed **RSP** Remedy Selection Plan, the plan outlining the cleanup alternatives and the proposed plan **SDWA** Safe Drinking Water Act TNT Trinitrotoluene, an explosives compound TTU Thermal Treatment Unit; a system that uses heat to remove contaminants from soil UXO Unexploded Ordnance

Appendix C Glossary of Terms and Acronyms Decision Document Demo 1 Groundwater OU Massachusetts Military Reservation September 15, 2006 Page 3 of 3

# APPENDIX D ON-BASE PROHIBITION ON NEW DRINKING WELLS

# DEPARTMENT OF THE ARMY



US ARMY ENVIRONMENTAL CENTER
IMPACT AREA GROUNDWATER STUDY PROGRAM OFFICE
1803 WEST OUTER ROAD
CAMP EDWARDS, MA 02542-5003

SFIM-AEC-IA

28 September 2006

### MEMORANDUM FOR

COL Steven E. Wujciak, Commander, ARNG Training Site, Bldg. 3468, Camp Edwards, MA 02542

COL Paul G. Worcester, Commander 102d Fighter Wing, Bldg. 158, Otis ANGB, MA 02542

SUBJECT: Land Use Controls for Demolition Area 1

- 1. The Decision Document for the Demolition Area 1 (Demo 1) groundwater operable unit requires Land Use Controls that prevent or reduce exposure to contaminated groundwater associated with Demo 1 and to protect remediation infrastructure.
- 2. The Demo 1 contaminated groundwater plume and the related groundwater treatment infrastructure are located on Camp Edwards (see attached map). In order to ensure this groundwater is not used for drinking water purposes, you, and the other component commanders on the MMR, have established a prohibition against any new drinking water wells serving 25 or fewer customers (attached). Drinking water wells that service more than 25 customers are regulated through the Massachusetts Department of Environmental Protection's permitting process. This prohibition has been provided to the Facilities Management Office, Base Civil Engineering and Environmental Management Offices for Camp Edwards and the 102d Fighter Wing as appropriate, where it will be used for facility and land use planning activities per Air National Guard Instruction (ANGI) 32-1003, Facilities Board; Army National Guard Regulation 210-20, Real Property Development Planning for the Army National Guard; and Commandant Instruction Manual 11010.14, Shore Facility Project Development Manual.
- 3. Another key element of the Land Use Controls is the continued implementation of the Dig Safe and Dig Permit processes used by MMR components and tenants to ensure that cleanup infrastructure is not damaged. Your staff's continued diligence in using the established program is required to ensure the viability of this Land Use Control.
- 4. Since these Land Use Controls are a part of the Demo 1 remedy, we request your acknowledgement of this transmittal. Any comments or questions regarding this issue can be directed to me at (508) 968-5107.

KENT R. GONSER Program Manager

Kent & Lorge

# Acknowledgement

The Massachusetts Army National Guard acknowledges the Land Use Control requirements as
outlined above.
Socroiser 2006
COL Seeven E. Wygrak, Commander, Camp Edwards Date
TI 1021 Tille Win all and I add I cold I cold a service and in data

The 102d Fighter Wing acknowledges the Land Use Control requirements as outlined above.

COL Paul G. Worcester, Commander, 102d Fighter Wing Date

## Attachments:

MMR Prohibition on Drinking Water Wells Serving 25 or Fewer Customers (August 2006) Demo 1 Groundwater Operable Unit Plume Map

cc: MANG FMO MANG E&RC 102d BCE 102d EMO

# MASSACHUSETTS MILITARY RESERVATION

# PROHIBITION ON DRILLING DRINKING WATER WELLS SERVING 25 OR FEWER CUSTOMERS

The 102<sup>nd</sup> Fighter Wing, Geographically Separated Units, tenants, and other lawful users located on Otis Air National Guard Base under the control of the Commander, 102<sup>nd</sup> Fighter Wing, Otis Air National Guard Base, will not drill, cause or allow to be drilled any drinking water well serving 25 or fewer customers on land located on Otis Air National Guard Base.

COL WORCESTER

Date

Camp Edwards, Geographically Separated Units, tenants, and other lawful users located on Camp Edwards under the control of the Commander, Camp Edwards, will not drill, cause or allow to be drilled any new drinking water well serving 25 or fewer customers on land located on Camp Edwards. The existing wells operating at the Ammunition Supply Point and Range Control can continue to be operated, maintained and replaced as required.

OL WUJCIAK

Date O

Air Station Cape Cod, Geographically Separated Units, tenants, and other lawful users located on Air Station Cape Cod under the control of the Commander, Air Station Cape Cod, will not drill, cause or allow to be drilled any new drinking water well serving 25 or fewer customers on land located on Air Station Cape Cod. The existing well operating at the Communications Station can continue to be operated, maintained and replaced as required.

CAPTAIN OSTEBO

Date

