

# Pease RAB Community Updates

Pease RAB meeting | Nov 1, 2023

- TASC Update
- Pease RAB Community Letter to USAF, USEPA, & NHDES
- DoD Policies & Follow Up Questions
- ECCOI Update

# TASC Update

- EPA headquarters approved Pease RAB community members for Technical Assistance Services for Communities (TASC) in May 2023
- Scientists from Skeo are assigned to work with our community
  - Hagai Nassau, Karmen King, Aarsal Khan, and Claire Marcussen
- Pease RAB community members met with Skeo in May, June, July, September, and October
  - May & June were preliminary meetings to discuss Pease community needs/priorities and Skeo's capabilities
  - Skeo team attended Pease RAB workshop in July, toured 3 Pease treatment plants, and toured community surrounding the former base.
  - September and October meetings were Skeo presenting their impressions and findings of historical Pease documents as part of the CERCLA process.

# TASC Update

Meeting on Sept 18, 2023 to review Pease PFAS Preliminary Assessment (PFAS PA), PFAS Expanded Site Inspection (PFAS Expanded SI), PFAS Remedial Investigation Work Plan (PFAS RI WP)

Summary of comments/questions from Skeo:

- Many questions asking if the forthcoming RI and BHHRA incorporate current PFAS state-of-the-science knowledge regarding screening levels and toxicity as it becomes available?
  - Will previously collected datasets (from the PA, Expanded SI and other studies) be revisited with the current PFAS screening levels in order to ensure a complete evaluation of all PFAS chemicals using more current and applicable concentrations?
  - Will the preliminary remediation goals be revised to reflect the current toxicity status of PFAS (as USEPA did when it revised its Pease AFB- specific screening levels)?
- Will all available data be evaluated by the RI and BHHRA regardless of threshold screening in order to provide a more complete understanding of PFAS nature, extent and risk?
- Groundwater-to-surface-water pathways are being excluded due to the presence of marine clay and silt that prevent groundwater-to-surface-water linkages
  - Can the forthcoming RI test the theory of marine clay and silt isolation with the use of PFAS loading analysis in the drainages?

# TASC Update

Meeting Oct 2, 2023 to review the Pease Baseline Human Health Risk Assessment Work Plan (BHHRA).

Summary of comments from Skeo:

- The focus of the BHHRA is “only on PFOA, PFOS and PFBS”. It is important to include all PFAS compounds with toxicity values in the BHHRA so that all risks can be screened during the hazard identification step.
  - Will the BHHRA address all detected PFAS with established toxicity values to be screened and then be carried further through the BHHRA?
  - Will the BHHRA address these uncertainties caused by outdated toxicity values by using the most current toxicity values and the latest analytical methods that can detect PFAS at or below the previous screening levels from which decisions about the BHHRA were made?
- Inhalation & dermal exposure pathway not quantitatively assessed for PFAS because of the absence of currently recommended toxicity values by EPA. TASC’s review of EPA’s May 2023 regional screening level (RSL) tables shows that there now are dermal absorption factors available for the following PFAS: PFBS, PFBA, PFHxS, PFHxA and PFNA.
- Will the USAF commit to quantifying the PFAS cancer risks and noncancer hazards using the most current toxicity data and methods, as reflected in the May 2023 USEPA updates to site health-based screening levels for all PFAS with established toxicity values?

# TASC Update

## BHHRA comments (continued):

- It is unclear why finfish are not included in the chemicals of potential concern (COPC) selection. Finfish data were collected in 2021.
  - Will all exposure media be evaluated as part of the COPC selection process?
- The detection limits for shellfish exceed the child health-based screening level in all the 2021 samples for PFNA. A similar observation is made for nearly all the PFOS samples, where only one of 76 samples was below the health-based screening level for adults and children. All remaining detections and detection limits for PFOS exceeded both the adult and child health-based screening levels. For PFOA, all shellfish and finfish samples were below detection. However, the detection limits exceed the child health-based screening levels.
  - Will fresh and marine finfish data be collected and analyzed using a more sensitive analytical method so that exposure to finfish can be evaluated quantitatively in comparison to the RSLs in the BHHRA?
  - Now that updated toxicity values have become more stringent for PFOA and PFOS and more toxicity values are available for several other PFAS - will additional finfish samples be collected and analyzed using the most recent USEPA methods to confirm that bioaccumulation in finfish would be lower than bioaccumulation in shellfish?
  - Why are there no COPCs anticipated for marine offshore media in the BHHRA, especially since toxicity criteria have become more stringent for PFAS and detection limits were elevated in finfish?
  - Will estuarine finfish be collected to demonstrate whether this exposure pathway is significant or not compared to the ingestion of shellfish exposure pathway?

# TASC Update

Next steps w/TASC & Skeo:

- There is a Draft Remedial Investigation Informal Technical Information Report (ITIR) that will be shared with the RAB soon.
- The Pease RAB community members wants the Skeo team to review the ITIR, give a presentation to the community on the findings with their comments, and engage in a technical meeting with the Pease community, USAF & their consultants, NHDES, and USEPA.

# RAB Letter to USAF, USEPA, & NHDES

- Skeo was not given the ~ 20 technical memorandums associated with the BHHRA that would likely have addressed some of their questions and comments
- Bigger issues revealed:
  - Pease RAB is not informed when new documents are published to the Administrative Record (AR) or NHDES One Stop
  - The community is not informed on how to access these websites with important documents
- As a result of Skeo's review of historical documents at Pease and presentations, Pease RAB community members sent a letter to the USAF, USEPA, and NHDES on Oct 16, 2023, with several requests, comments, and questions.
  - Comments/questions re: historical documents at Pease
  - Pease RAB members be notified when documents are posted online & training/education to community on how to access documents on AR/NHDES One Stop
  - Request a future technical meeting after the community and Skeo review the Draft Remedial Investigation Informal Technical Information Report (ITIR)
  - Update on the data sharing policy issued in Aug 2023

# DoD Policies

## 2 DoD policies issued this summer that is important for Pease RAB to know about:

- *7/11/2023: Memorandum for Taking Interim Actions to Address PFAS Migration from DoD Installations and National Guard Facilities*
  - “The DoD Components are further directed to prioritize implementation of interim actions as expeditiously as possible to address PFAS under CERCLA, such as removal of soil or sediment “hot spots” and installation of groundwater extraction systems, where supported by site-specific information”
  - **Pease Community Question: Based on this memo, are there additional interim remedies that can be taken at Pease to address clean up of PFAS?**
  - **Pease Community Question: Is the IMS designed for Site 8, even as now proposed to be fixed/improved, adequate to address the principal known source of off base contamination of private property in Newington and adjacent estuaries?**
- *8/24/23: Managing controlled unclassified information in DoD Environmental Clean Up Data and Reports*
  - Latitude/longitude associated with results from non-drinking water samples (e.g., soil, surface water, sediment, groundwater), drinking water or non-drinking water samples taken from non-residential property owners is not protected under law or the DoD policy and should be shared with supporting regulatory agencies, as soon as practicable.
  - **Pease Community Question: Based on this memo, how will data sharing change at Pease with the community and NHDES?**



# ECCOI Update

- DoD is conducting an Environmental Cleanup Communication & Outreach Initiative (ECCOI) - a DoD effort focused on enhancing communication with communities surrounding former and current DoD installations.
- In May 2023, the Pease community requested our RAB be included in DoD's ECCOI efforts
- In June 2023, Pease was a selected site for ECCOI
- In July 2023, ECCOI staff attended/observed the Pease RAB workshop and several Pease RAB members (present and past) and other stakeholders were interviewed as part of the ECCOI effort
- Currently awaiting the outcome and recommendations from the ECCOI efforts from DoD
- Thank you to all for participating

<https://www.acq.osd.mil/eie/eer/ecc/pfas/docs/po/ECCOI-Slick-Sheet-as-of-22Aug23.pdf>



**Environmental Cleanup Communication & Outreach Initiative**  
Enhancing communication and outreach with communities across the country on DoD cleanups.

DoD's Environmental Cleanup Communication & Outreach Initiative (ECCOI) is a DoD effort focused on enhancing communication with communities surrounding former and current DoD installations.

**Your input will help DoD:**

- Identify best practices and highlight opportunities for collaboration and better public engagement with communities
- Examine the effectiveness of DoD's current public outreach and communication efforts
- Enhance methods for communicating about environmental cleanup to ensure transparency
- Expand public access to information that explains cleanup progress and initiatives
- Increase participation at local Restoration Advisory Board meetings
- Build stronger relationships with communities and agency partners

**What's next?**  
Additional input will be taken at upcoming Restoration Advisory Board meetings and other public forums:



Location	Dates
Naval Air Station Whidbey Island, Washington	17-18 October 2023
Camp Grayling Joint Maneuver Training Center, Michigan	16 May 2023
Former Wurtsmith Air Force Base, Michigan	17-18 May 2023
Former Pease Air National Guard Base/Air Force Base, New Hampshire	20-21 July 2023
Fort Devens, Massachusetts	30-31 August 2023
Former Naval Air Station Joint Reserve Base Willow Grove and Biddle Air National Guard Base, Pennsylvania	15-16 March 2023
Fort Monroe, Virginia	3-4 May 2023
Morris Air National Guard Base, Arizona	18-19 April 2023
Davis-Monthan Air Force Base, Arizona	17-18 April 2023

For more information regarding DoD's cleanup efforts visit: [www.defense.gov/pfas](http://www.defense.gov/pfas)

