9 SEP 2025

DRAFT IRA2-52059

COMMENT LETTERS SENT TO DCAMM

1. TOWN
2. W. MASSARO
3. CHARLES RIVER WATERSHED ASSOC.
4. JOHN THOMPSON

TOWN

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Town Administrator

Brittney Franklin
Assistant Town Administrator

TOWN OF MEDFIELD

Office of the Select Board

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BY EMAIL

September 9, 2025

Commonwealth of Massachusetts
Attn: Susan Ruch and Jonathan Moore
Division of Capital Asset Management & Maintenance
One Ashburton Place, 15th Floor
Boston, MA 02108

Re: Former Medfield State Hospital – Town of Medfield Comments regarding DCAMM's draft Immediate Response Action RTN 2-52059

Ms. Ruch and Mr. Moore:

The Town of Medfield has reviewed DCAMM's draft Immediate Response Action ("IRA"), dated August 2025, concerning the former Medfield State Hospital project under Release Tracking Number ("RTN") 2-52059 (the "Site"). Generally, the Town has no objection to the IRA. However, we do have a handful of additional sources of data that would be helpful in continuing to evaluate the presence of PFAS on the site, including:

1. A comprehensive gauging round of all existing monitoring wells in the C&D and SPD Areas, and updated groundwater elevation contour maps for the Site, which we understand may be prepared as part of updated site conceptual modeling.

2. To the extent it is available, the Charles River Background data referenced in Section 3.2.1 of the IRA.

Additionally, we are interested in DCAMM's thoughts and responses to PIP Group leader Bill Massaro's comments, submitted separately.

We appreciate this opportunity to comment and look forward to continued dialogue concerning the Site.

Sincerely,

Kristine Trierweiler
Town Administrator

cc: William Massaro, PIP Group Lead (wmassaro@comcast.net)
Lisa Kumpf, Charles River Watershed Association (lkumpf@crwa.org)
Jessica Wall, Medfield Environmental Counsel (jwall@andersonkreiger.com)
Kristen Gagalis, Medfield Environmental Counsel (kgagalis@andersonkreiger.com)

W. MASSARO

36 Evergreen Way
Medfield, MA 02052-1013
9 September 2025

BY EMAIL

Commonwealth of Massachusetts
Attn: Susan Ruch and Jonathan Moore
Division of Capital Asset Management & Maintenance
One Ashburton Place, 15th Floor
Boston, MA 02108

Re: My Comments- Draft IRA RTN2-52059

Ms. Ruch and Mr. Moore:

As an abutter of the former State Hospital Property and leader of the Public Involvement Group, I am encouraged that DCAMM will be continuing investigation of PFAS at the site under IRA RTN2-52059.

While I have no objection to the proposed assessment activity, I am primarily concerned about its lack of specific additional sampling in areas adjacent to the C&D Area and to the Zone II of main Town Well #6. My comments and questions are attached.

Thank you for the opportunity to review and comment on the Draft IRA,

Your truly,



William Massaro
PIP Group Lead

Attachment : Comments/Questions/Concerns W. Massaro 9-3-2025

cc: Kristine Trierweiler, Town Administrator (ktrierweiler@medfield.net)
Jessica Wall, Medfield Environmental Counsel (jwall@andersonkrieger.com)
Kristen Gagalis, Medfield Environmental Counsel (kgagalis@andersonkreiger.com)
Heather Miller, CRWA General Counsel (hmiller@crwa.org)
Lisa Kumpf, CRWA Sr. Restoration Program Mgr.(lkumpf@crwa.org)

Comment/Concerns/Questions-Draft IRA RTN 2-52059

A. Extent of Investigations

While the Nature of contaminants is important, my initial comments and concerns have always been with an investigation's Extent .

1. The IRA plan describes looking in the C&D Area and "*possibly*" looking in abutting areas based on results of the initial sampling.

   Comment :

   The Plan should consider potential sewage-related sources of PFAS:
   - leaking MSH sewage line previously identified by Roux -
   - the former MSH sewer beds
   - bio-solid fertilizer application on Parcel A-2, Parcel B, and Well #6 field.

2. The Plan (Section 3.2.3 p. 3-1) says surface water sampling in the Charles River upstream, downstream, and site adjacent may be performed; and groundwater samples may be collected from additional existing Site monitoring wells, and additional Site wells or piezometers may be added "...*if deemed necessary*".

   Comment :

   The Plan should include :
   - surface water sampling in the Charles River & site-adjacent areas
   - and in site adjacent areas.
   - collection of samples from additional existing Site Monitoring Wells,
   - addition of piezometers if necessary

B. Initial Sampling Results(Table2)

It is my understanding that currently MassDEP is staying with the 2020 PFA6 twenty ppt total of PFHxS, PFHpA, PFO, PFOS, PFNA and PFDA

1. Comment:

   Note that actual totals of these six PFAs samples are higher than what is stated in IRA Section 2.2 Release Description (p.2-2) and shown in *PFAS MA (6 total)* results Table 2. The only wells that move from <20 to over >20 are In GW-2 : SPD-MW's- 401S, 401S duplicate, 501, and 906. SPD- MW-905 was already above 20.0. None of these are GW-2 excedences. . .

Draft IRA GW-1 PFA6--Totals of Samples Do Not Match Table Totals WM 9-3-2025

	GW-1				GW-2									
	CD-MW	CD-MW	CD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW
PFAS	601	603	603 DUP	402	101	401S	401S DUP	501	602	704	903D	903S	905	906
PFHxS	9.2	1.9	2.0	1.8	1.8	1.9	1.8	1.8	1.9	1.9	1.8	1.9	2.3	1.9
PFHpA	18.0	7.1	7.9	5.8	1.8	2.0	1.9	2.2	1.9	1.9	1.8	1.9	5.2	2.4
PFOA	1.8	9.7	11.0	12.0	3.4	5.1	5.6	5.3	1.9	3.1	3.0	3.6	30.0	5.6
PFOS	1.8	13.0	13.0	12.0	3.7	7.8	8.4	11.0	9.1	6.8	5.5	3.6	27.0	8.5
PFNA	1.8	1.9	1.9	1.8	1.8	1.9	1.8	1.8	1.9	1.9	1.8	1.9	6.2	1.9
PFDA	1.8	1.9	1.9	1.8	1.8	1.9	1.8	1.8	1.9	1.9	1.8	1.9	1.9	1.9
PFA6 Total	34.4	35.5	37.7	35.2	14.3	20.6	21.3	23.9	18.6	17.5	15.7	14.8	72.6	22.2
Draft's Total	27.2	29.8	33.9	29.8	7.1	14.9	18.8	18.5	9.1	9.9	8.5	7.2	70.7	16.5

2. Comment

It is my understanding that the EPA Hazard Index has been temporarily put on hold. I believe the four specific PFAS are PFHxS, HFPO-DA(GenX), PFNA and PFBS at 10 ppt each . The Hazard Index is calculated by dividing the concentration of two or more of these PFAS in water by its Health-Based Water Concentration. The EPA's standard is exceeded if sum of these fractions is greater than 1.

Question; Would the GW-1 samples below have met or exceeded the Hazard Index.?

Are PFBS a potential GW-1 Issue?

	GW-1				GW-2									
	CD-MW	CD-MW	CD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW	SPD-MW
Hazard Index	601	603	603 DUP	402	101	401S	401S DUP	501	602	704	903D	903S	905	906
PFHxS	1.8	1.9	2.0	1.8	1.8	1.9	1.8	1.8	1.9	1.9	1.8	1.9	2.3	1.9
HFPO-DA(GenX)	1.8	1.9	1.9	1.8	1.8	1.9	1.8	1.8	1.9	1.9	1.8	1.9	1.9	1.9
PFNA	1.8	1.9	1.9	1.8	1.8	1.9	1.8	1.8	1.9	1.9	1.8	1.9	6.2	1.9
PFBS	13.0	10.0	11.0	6.9	1.9	1.8	1.9	1.8	1.9	1.9	1.6	1.9	3.1	1.9

C. IRA Plan -Section 3.0 (p.3-1)

*1.*Section 3.2.1 States that *"research and evaluation will be performed for properties adjacent to the Site to evaluate for upgradient PFAS sources (e.g. upstream on the Charles River)"..*

Comment: Upgradient Parcel A-2 should be included in the evaluations:

- Agricultural bio-solids
- Remediated Clay Containment Pits (C&D oil -contaminated soil/ and C & Debris)

Note: See Also A.2 above)

2. Section 3.3 Risk Characterization states that "*a human and environmental risk characterization based on the IRA assessment data obtained; and the risk characterization will be performed in accordance with the MCP Subpart I and associated MassDEP guidance documents"*

Comment:: Per the EPA their 2024 PFAS standards are only on hold

" *to allow drinking water systems more time to develop plans for addressing PFOA and PFOS where they are found and implement solutions. EPA plans to issue a proposed rule this fall and finalize this rule in the Spring of 2026.... including a proposal to extend the compliance date to 2031."*

Question: Does DCAMM have any plans to comply with the known planned Maximum Contaminant Levels changes for PFOA and PFOS?

CRWA

Charles River
Watershed Association

September 9, 2025

Via email

Jonathan Moore, Project Manager
Division of Capital Asset Management & Maintenance (DCAMM)
Jonathan.Moore@mass.gov

Re: Draft Immediate Response Action (IRA) Plan for Release Tracking Number (RTN) 2-52059 (PFAS detection at the former Medfield State Hospital site)

Dear Jonathan,

Charles River Watershed Association (CRWA) submits the following comments on the draft Immediate Response Action (IRA) Plan for Release Tracking Number (RTN) 2-52059, associated with the detection of per- and polyfluoroalkyl substances (PFAS) in groundwater samples collected within a portion of the former Medfield State Hospital (MSH) property located at 45 Hospital Road, along the Charles River in Medfield. "The objective of the IRA is to preliminarily evaluate the nature and extent of the PFAS impacts in Site groundwater and to evaluate the need for potential future response actions for PFAS."[1]

PFAS are persistent "forever chemicals"—they do not break down and will remain in the environment for long periods of time, if not indefinitely. PFAS are highly mobile in water and can quickly migrate long distances away from their original sources. PFAS have been found to be toxic to people at extremely low levels. Health concerns associated with PFAS exposure include changes to metabolism, decreased fertility, reduced ability of the immune system to fight infections, and cancer. Impacts from PFAS can be particularly harmful to vulnerable populations such as fetuses, infants, and children. Studies have found that Perfluorooctanoic acid ("PFOA") and

[1] IRA at 8.

Perfluorooctanesulfonic acid ("PFOS") can have significant and lasting impacts on children's health at levels as low as 1 part per trillion ("ppt"). Although the health impacts of PFOA and PFOS are the most widely studied, there is evidence to support that due to structural similarities, the health concerns of PFOA and PFOS are representative of PFAS as a class of chemicals. Thousands of distinct PFAS chemicals have been produced, and these chemicals can have cumulative impacts on human health.

Surface waters like the Charles River and its tributaries are inextricably linked to groundwater and drinking water. PFAS enter surface water through groundwater discharge, runoff from contaminated land, and discharges from industrial sites and wastewater treatment plants. Surface waters in turn, along with groundwater, are sources of drinking water. And much of the drinking water used in our homes eventually makes its way back to surface waters, whether through treatment and discharge from a wastewater treatment plant or because it is used for irrigation or other outdoor uses and migrates back into the soils, groundwater, and then surface waters.

Groundwater sampling conducted in May 2025 at the MSH site identified the presence of PFAS above the applicable state standards in three monitoring wells. The proximity of these monitoring wells to the Charles River triggered this Immediate Response Action. The area subject to the planned IRA assessment activity is located along the south bank of the Charles River and includes restored wetland from the former construction and demolition area (C&D area, which contained C&D debris, other debris, and ash from the former on-site power plant) remediation and undeveloped upland areas outside of the former C&D area.

As part of the IRA, DCAMM will research properties adjacent to the MSH site to evaluate for potential upgradient PFAS sources (e.g., upstream on the Charles River), evaluate available background data for the Charles River, perform forensic evaluation to identify and compare the chemical fingerprint of PFAS compounds in groundwater and surface water to identify potential sources and evaluate differences in PFAS compound ratios, perform hydrogeologic desktop review to evaluate potential connections between MSH site groundwater and nearby public water supply wells, and conduct additional groundwater sampling.[2] The draft IRA indicates that if it is "deemed necessary," surface water sampling and groundwater sampling from

[2] IRA at 8.

additional existing or new monitoring wells will also be performed.[3] Based on the assessment data, DCAMM will develop a human and environmental risk characterization.[4]

CRWA strongly recommends that surface water sampling and groundwater sampling from additional existing/new monitoring wells be planned as proactive measures in the IRA—not only "if deemed necessary." In particular, surface water sampling should be required in order to assess whether PFAS are present in the Charles River at this location, and at what levels. The IRA does not specify the circumstances under which such additional sampling would be considered necessary, and we do not have confidence in DCAMM or their consultant to make this determination accurately. We note that in their January 2025 memo to DCAMM, Weston & Sampson indicated that they did not believe there was a need for *any* groundwater sampling of PFAS on the MSH site; however, once sampling was conducted—at the urging of the Town, public, and MassDEP—PFAS were detected at levels above the state standards. DCAMM should not take the same flawed approach here and assume the absence of PFAS; they should be proactive and conduct both surface water and additional groundwater sampling to confirm or rule out the presence of PFAS and take appropriate action accordingly.

Thank you for considering these comments.

Sincerely,

Heather Miller

Heather Miller, General Counsel

cc: Susan Ruch, DCAMM
Kristine Trierweiler, Town of Medfield Administrator
Jessica Wall, Medfield Environmental Counsel
Bill Massaro, PIP Group Leader
Mark Baldi, MassDEP Deputy Regional Director

[3] IRA at 8-9.
[4] IRA at 9.

JOHN THOMPSON

John Thompson

John Thompson <jthompson166@verizon.net> 9/5/2025 4:45 PM

PFAS Draft IRA Plan Comments

To Moore, Jonathan (DCP) <jonathan.moore@mass.gov> Copy Kristine Trierweiler <ktrierweiler@medfield.net> • Jessica Wall <jwall@andersonkreiger.com> • Pete Peterson <osler.peterson@oslerpeterson.com> • WILLIAM MASSARO <wmassaro@comcast.net> • Lisa Kumpf <lkumpf@crwa.org>

Below please find my questions/comments for consideration on the draft IRA plan for investigation of PFAS at the MHS Overlook:

3.2.1
This part of the plan presents "Research and Evaluation" but is missing the part that describes the additional testing to be done to perform the research and evaluation.

Why is "*upstream on* the Charles River" under consideration for PFAS sources?

Isn't the best way to research the river as a source of pfas by collecting empirical data from the river itself?

Doesn't the existing GW flow mapping show the pfas impacted wells as hydrogeologically adjacent to and upgradient of the Charles River?

There is evidence of leachate breakout (including photographs) at the toe of the gas line slope downgradient of the impacted wells into the adjacent Charles River. Sampling this leachate, and the adjacent surface water, should be performed to "evaluate differences in pfas compound ratios" and "potential sources".

What is the significance of researching "differences" in pfas compound ratios? (purpose and objective).

3.2.2
What QA/QC measures will be taken during sampling to inspect for and to prevent contamination of samples by the sampling equipment?

Will equipment blank samples, and a blind duplicate be collected during sampling events?

What is the potential bias effect, or not, from "isotope dilution and/or EPA Method 1633"?

Considering TOC elevation does the screened interval for the monitoring wells proposed for sampling overlap by 50% or more?

Are the monitoring wells constructed with PVC?

3.2.3
Does this task reveal a concern that the Charles River is a source of pfas contamination or a receptor of pfas contamination from the site?

More likely than not, isn't the Charles River a potential receptor for MCP regulated pfas contamination from the site, since it's already been identified as such for the other site related COCs from the same upgradient monitoring wells?

What results of groundwater sampling and evaluation will be used to determine if surface water sampling is necessary- wouldn't research and evaluation be made after, rather than before, testing the environment?

3.2.4
Why is the addition of additional monitoring wells being presented as a "may be added", given that the upgradient and downgradient extent of pfas and metals exceeding GW standards has yet to be determined, especially since these wells are located downgradient of the capped waste?

If the plan assumes that the extent of COCs in monitoring wells along the gas line meet the performance standard for having documented upgradient and downgradient extent under the MCP, can this be stated?

3.3
The plan states that an "environmental risk characterization" will be performed, but the plan makes no mention of the basis for the preparation of the ERC. Can a description of what exactly will be sampled, observed, or reviewed to fulfill MCP Subpart I and associated Guidance be added?

Thank-you.

John Thompson