

**From:** [Hull, Richard](#)  
**To:** [Peter L. Britz](#)  
**Cc:** [Chris Buckman](#); [andrew.hoffman@des.nh.gov](mailto:andrew.hoffman@des.nh.gov); [Soukup, James](#)  
**Subject:** RE: Annual sampling  
**Date:** Friday, March 27, 2020 10:07:00 AM

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Hello Peter,

After consultation with NHDES, USEPA provides the following response to CES, Inc.'s *Proposed Groundwater Sampling Program Revisions*, prepared on behalf of the CLG, and submitted on March 23, 2020.

#### Surface Water Sampling

- CES, Inc. proposes removing VOC analysis from surface water samples, citing that VOCs have not been detected above the NHDES acute or chronic surface water standards for at least the last five years.
  - USEPA concurs with removing VOC analysis for surface water samples.

#### OU-1

- CES, Inc. proposes the reduction of sampling of OU-1 wells to once per year for all parameters outlined in the current SAP. CES, Inc. cites the decreasing or stable trends for most parameters at the majority of OU1 wells.
- Following a request by CLG in August 2019, USEPA approved a revision to sampling of OU-1 groundwater monitoring wells to once per year (Spring) for all parameters (VOCs, 1,4-dioxane, total and dissolved metals, PFAS and general water quality field parameters), and a reduction in analysis during the second semi-annual event (Fall) to 1,4-dioxane and PFAS only.
  - USEPA does not concur with the current proposal and sampling of OU-1 wells shall remain unchanged.

#### OU-2

- CES, Inc. proposes to sample only OU2 wells located at the perimeter of the GMZ (MW-20/-21/-22, FPC-2/-3/-4/-7/-9/-11 series wells, AE-1A/-1B, AE-4A/-4B) once per year (Fall) for PFAS, 1,4-dioxane, and water quality parameters only. CES, Inc. cites no significant increases in the concentration of monitored constituents in the wells proposed for a reduction in sampling.
- Following a request by CLG in August 2019, USEPA approved a revision to sampling of OU-2 groundwater monitoring wells to once per year (Spring) for all parameters (VOCs, 1,4-dioxane, total and dissolved metals, PFAS, and general water quality field parameters), and a reduction in analysis during the second semi-annual event (Fall) to 1,4-dioxane and PFAS only.
  - USEPA does not concur with the current proposal and sampling of OU-2 well shall remain unchanged.

#### Private Wells

- CES, Inc. proposes the development of a schedule that will sample half of the private supply wells every six months, resulting in each private well currently in the monitoring program to be sampled once per year instead of twice per year. CES, Inc. cites the absence of 1,4-dioxane

from the majority of wells sampled, and the continued low levels of PFOA and PFOS.

- Following a request by CLG in August 2019, USEPA approved a revision to sampling of private wells to include analysis of only 1,4-dioxane and PFAS, and to discontinue analysis of VOCs, arsenic and manganese.
  - USEPA does not concur with the current proposal and sampling of private wells shall remain unchanged.

In addition, please provide a schedule for the validation and finalization of data from the fall monitoring round, and the delivery of validated results to private well owners.

Let me know if you have any questions regarding this response.

Regards,  
Skip

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**From:** Peter L. Britz <[plbritz@cityofportsmouth.com](mailto:plbritz@cityofportsmouth.com)>  
**Sent:** Monday, March 23, 2020 2:41 PM  
**To:** Hull, Richard <[Hull.Richard@epa.gov](mailto:Hull.Richard@epa.gov)>; [andrew.hoffman@des.nh.gov](mailto:andrew.hoffman@des.nh.gov)  
**Cc:** Chris Buckman <[cbuckman@cesincusa.com](mailto:cbuckman@cesincusa.com)>  
**Subject:** Annual sampling

Hello Skip:

Attached please find a request for some sampling reductions outlined in a memo by CES. If you have questions or need additional information please do not hesitate to contact me.

Best,  
Peter