



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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August 14, 2024

Town of Princeton
6 Town Hall Drive
Princeton, MA 01541

Attention: Sherry Patch,
Town Administrator

RE: IRA Plan Modification
Conditional Approval
6 Town Hall Drive
Princeton, Massachusetts
RTN 2-0021072

Dear Ms. Patch,

On July 26, 2024, MassDEP received an Immediate Response Action (IRA) Plan Modification, submitted on your behalf by Licensed Site Professional (LSP) Jeffrey Arps, requesting that the monitoring schedule for the Point of Entry Treatment (POET) systems in service for more than two years be reduced from quarterly to semi-annually, with influent, midfluent and effluent samples collect in April and October of each year. Additionally, the IRA Plan Modification requests that the requirement for field blank sample analysis be eliminated.

MassDEP has reviewed and **approves** your July 26, 2024 IRA Plan Modification, in consideration of the volume of data that you have collected to support your request, with the following conditions:

1. The reduction of monitoring frequency will only apply to double-vessel POET systems that have been effectively in operation for at least two years. The current monitoring schedule of single-vessel POET systems is to remain unchanged.
2. The Department approves of the elimination of the collection and analysis of PFAS Field Blanks for potable water samples with the following exceptions:
 - The first-time drinking water at a property is sampled for PFAS6 evaluation; and
 - During resampling due to high-bias data quality concerns in the opinion of the Licensed Site Professional (LSP). Data quality concerns could include, but are not limited to:
 - The detection of one or more compounds that were not previously detected at that location;

This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.

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- A change in the risk level that would require a revised response action at the property due to the new data; and/or
- An increase in concentrations that is not consistent with the conceptual site model for that property based on the existing data set for that property and/or adjacent or proximal properties.
- The requirement for the collection and analysis of Field Blanks is established in the published EPA Document #EPA/600/R-20/006 "Method 537.1 Determination of Selected Per- and Polyfluorinated Alkyl Substances in Drinking Water by Solid Phase Extraction and Liquid Chromatography/Tandem Mass Spectrometry (LC/MS/MS)" Version 2 dated March 2020. The Massachusetts Contingency Plan (MCP), at 310 CMR 40.0017(2)(b), allows that procedures and methodologies employed for the collection and analysis of soil, sediment, water, vapor, air and/or waste samples can include modifications of published methods, provided that all modifications are completely documented. Please document any modifications to the published method in your future IRA Status Reports.

This approval is specific to the IRA at this disposal site, and applies only to requirements of the Massachusetts Contingency Plan, 310 CMR 40.0000. If you have any questions, please contact Sarah Showalter by email or phone at 781-366-9081, or MassDEP attorney Bernard Hayes at 508-767-2889 or Bernard.T.Hayes@mass.gov. MassDEP appreciates your cooperation in these matters.

Sincerely,



Sarah Showalter
Environmental Analyst
PFAS Section
Bureau of Waste Site Cleanup

MEB\JP\SS

ecc: Princeton Town Administrator - townadministrator@town.princeton.ma.us
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