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17	THE OWNER CONTRACTION
18	CIVIL ENGINEER
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22	WSP USA Environment & Infrastructure Inc.
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24	Contract FA8903-16-D-0027
25	Task Order FA8903-21-F-1048
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1		LIST OF ACRONYMS AND ABBREVIATIONS
2	95% UCL	95th percent of the upper confidence level on the mean
4	AFCEC	USAF Civil Engineer Center
5	AFFF	Aqueous Film Forming Foam
6	ANWR	Aroostook National Wildlife Refuge
7	ATSDR	Agency for Toxic Substances and Disease Registry
8		
9	BERA	Baseline Ecological Risk Assessment
10	BHHRA	baseline human health risk assessment
11	bgs	Below Ground Surface
12	C	
13	CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
14	CFR	Code of Federal Regulations
15	COCs	Contaminants of Concern
16	COPEC	Contaminants of Potential Ecological Concern
17	CSM	Conceptual Site Model
18	CTE	Central Tendency Exposure
19		
20	DoD	Department of Defense
21		
22	EPC	Exposure Point Concentrations
23	ERA	Ecological Risk Assessment
24	ERAGS	Ecological Risk Assessment Guidance for Superfund
25		
26	FFA	Federal Facilities Agreement
27	FS	Feasibility Study
28	ft	feet
29	FTA	Fire Training Area
30	FYRs	Five Year Reviews
31		
32	GMZs	Groundwater Management Zones
33		
34	HA	Health Advisory
35	HI	Hazard Index
36	HQ	Hazard Quotient
37		
38	IC	Institutional Controls
39	IRP	Installation Restoration Program

1		
2	LDA	Loring Development Authority
3	LF	Landfill
4	LOEC	Lowest-Observed-Effect-Concentration
5	LUC	Land Use Controls
6		
7	MEDEP	Maine Department of Environmental Protection
8	MEG	Maximum Exposure Guideline
9		
10	NCP	National Contingency Plan
11	NGVD	National Geodetic Vertical Datum
12	NOEC	No-Observed-Effect-Concentrations
13		
14	OU	Operable Unit
15		
16	PA	Preliminary Assessment
17	PAH	Polycyclic Aromatic Hydrocarbon
18	PCB	Polychlorinated Biphenyls
19	PFAS	Per- and Polyfluoroalkyl Substance
20	PFBA	Perfluorobutanoic acid
21	PFBS	Perfluorobutanesulfonic acid
22	PFDA	Perfluorodecanoic acid
23	PFHxA	Perfluorohexanoic acid
24	PFHxS	Perfluorohexanesulfonic acid
25	PFNA	Perfluorononanoic acid
26	PFOA	Perfluorooctanoic acid
27	PFOS	Perfluorooctanesulfonic acid
28		
29	RCRA	Resource Conservation and Recovery Act
30	RI	Remedial Investigation
31	ROD	Record of Decision
32		
33	SERDP	Strategic Environmental Research and Development Program
34	SI	Site Inspection
35	SLERA	Screening Level Ecological Risk Assessment
36	SVOC	Semivolatile Organic Compound
37		
38	ТРН	Total Petroleum Hydrocarbon
39		

1	USAF	United States Air Force
2	USEPA	United States Environmental Protection Agency
3	USFWS	United States Fish and Wildlife Service
4		
5	VOC	Volatile Organic Compound
6		
7	WSP	WSP USA Environment & Infrastructure Inc

1.0 INTRODUCTION

- 2 WSP USA Environment & Infrastructure Inc (WSP, formerly Wood) has prepared this Ecological Risk
- 3 Assessment (ERA) Work Plan in support of the Remedial Investigation (RI) at the former Loring Air Force
- 4 Base (Loring or Site) located in Limestone, Maine (Figure 1.0-1). This Work Plan has been prepared for the
- 5 United States Air Force (USAF) under Contract Number FA8903-16-D-0027 Task Order FA8903-21-F-1048.
- 6 The purpose of this Work Plan is to describe the technical approach to complete the Tier I Screening Level
- 7 Ecological Risk Assessment (SLERA) and first step of the Tier II Baseline Ecological Risk Assessment (BERA)
- 8 which is primarily focused on per- and polyfluoroalkyl substances (PFAS). Data collection and reporting
- 9 focused on defining the nature and extent of PFAS are being executed under separate tasks.
- 10 The objective of the SLERA is to determine if the available data support a finding of no ecological risk and
- 11 a conclusion that no further ecological risk assessment is needed, or whether there is evidence for
- 12 potential ecological risks that require more detailed investigation and analysis conducted as part of a
- 13 Baseline Ecological Risk Assessment (BERA).
- The SLERA will be completed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Contingency Plan (NCP) 40 Code of Federal
- 16 Regulations (CFR) Part 300 (United States Environmental Protection Agency [USEPA], 1988).

17 1.1 ECOLOGICAL RISK ASSESSMENT APPROACH

- PFAS encompass a heterogeneous group of more than 5,000 chemicals. For most PFAS, data suitable for assessing risks to the environment such as toxicity thresholds, effects, and bioaccumulation and elimination rates are lacking. This knowledge gap provides challenges for assessing risks from PFAS to the environment. However, the body of knowledge for this group of chemicals is expanding, and there are sufficient data to assess risks from eight PFAS compounds (PFBA, PFHxA, PFOA, PFNA, PFDA, PFBS, PFHxS, and PFOS) in soil, sediment pore water, and surface water, and are discussed further in **Section 2.3**.
- 24 The ERA will be conducted consistent with USEPA CERCLA ERA guidance documents, including:
- Ecological Risk Assessment Guidance for Superfund (ERAGS): Process for Designing and
 Conducting Ecological Risk Assessments (USEPA, 1997)
- Guidelines for Ecological Risk Assessment (USEPA, 1998)
- The Role of Screening-Level Risk Assessments and Refining Contaminants of Concern in Baseline
 Ecological Risk Assessments, ECO Update (USEPA, 2001)
- 30 ECO Updates published between 1991 and 2008 (USEPA 1991–2008)
- 31 Air Force Instruction 32-7020 (USAF, 2020)
- 32 Tri-Services Remedial Project Manager's Handbook for Ecological Risk Assessment (USACE, 2000)
- A Guide to Screening Level Ecological Risk Assessment (Tri-Services Environmental Risk Assessment
 Work Group (TSERAWG, 2008).

1 • Defense Environmental Restoration Program (DERP) Manual (DERP, 2018)

Documents developed by the Department of Defense (DoD) *Strategic Environmental Research and Development Program* (SERDP) related to screening of PFAS concentrations in assessing potential
 ecological risks will also be considered and include:

5 6 • A Framework for Assessing Bioaccumulation and Exposure Risks of PFAS in Threatened and Endangered Species (ER18-1502) (Gobas et al., 2020)

Additionally, documents developed under contract with DoD in coordination and consultation with
 interagency subject-matter experts from across the DoD Tri-Services Environmental Risk Assessment
 Work Group and including USEPA will also be considered:

10 • Derivation of PFAS Ecological Screening Values (Grippo, et al., 2021)

Although some of these PFAS-specific documents were written to address risks to threatened and
 endangered species, they provide frameworks and technical support that can also apply to common (i.e.,
 unendangered) species.

The ERA may consider additional future guidance or technical documents available at the time the ERA is
 written, if technically appropriate and approved by the USAF Civil Engineer Center (AFCEC).

- 16 Under USEPA CERCLA guidance (USEPA, 1997), an ERA is carried out in a two-tiered approach:
- 17 Tier I SLERA
- 18 Tier II BERA
- 19 The Tier I SLERA includes the first two of the eight steps in an ERA identified in the ERAGS (USEPA, 1997):
- Step 1 is the Screening Level Problem Formulation and Ecological Effects Evaluation.
- Step 2 is the Screening-Level Exposure Estimate and Risk Calculation.

The goal of the Tier I SLERA includes the identification of the preliminary chemicals of potential ecological
 concern (COPECs), assessment endpoints, and exposure pathways that will be the focus for any additional
 investigation and analysis, if it is determined that the BERA process should continue to Tier II.

The Tier II BERA evaluates contaminants in greater detail and in the context of site-specific factors and iscomposed of Step 3 through Step 7:

- Step 3 is a refinement of risk estimates using more realistic assumptions than those that were
 applied in the Tier I SLERA.
- Steps 4 through 7 of the BERA involve revisions to the Conceptual Site Model (CSM) and detailed
 toxicity testing, tissue sample collection, or other collection, analysis, and characterization of
 site-specific ecological data.
- 32 Step 8 is a risk management step performed after the BERA is completed.
- 33 Technically, Step 3 Refinement is the first step of the Tier II BERA, but several available desktop tools can

- 1 be applied immediately after the screening-level risk characterization to introduce additional lines of
- 2 evidence and further refine risk estimates. Therefore, Step 3 is commonly provided as part of the SLERA
- 3 Report.
- 4 This ERA Work Plan consists of Steps 1 through 3 and thus will include the first step of a Tier II BERA. The
- 5 need to perform subsequent steps will be determined only after completion of Step 3. This ERA Work Plan
- 6 does not describe activities that may be associated with Steps 4 through 8.

7 1.2 SITE HISTORY AND SETTING

- 8 In 1946, the Strategic Air Command developed a plan for a global Air Force. The plan called for the 9 Limestone Air Force Base at the northeastern tip of the United States. Loring was first established as 10 Limestone Air Force Base in 1947 and was later renamed after Korean War aviator Charles J. Loring in 1954. Construction began in 1947 and was completed in 1953. Loring Air Force Base was operated by the 12 USAF from 1950 to 1994.
- The installation became active in 1953 with the 42nd Bombardment Wing in residence to a series of state of-the art bombers and support aircraft. In 1955, the 42nd Air Refueling Squadron was activated. Starting in 1981, substantial renovations were made to the installation, including the addition of a second runway.
- 16 Base improvements continued through 1991 with the completion of a renovated alert facility, a new
- 17 medical center, and a new maintenance facility and upgraded aircraft refueling. The installation was
- 18 officially deactivated on 30 September 1994. Upon closure, responsibility for environmental cleanup at
- 19 the installation transferred to the Air Force Base Conversion Agency (AFCEC, 2011).
- 20 Aqueous film forming foam (AFFF) containing PFOS and PFOA was used at Loring to respond to petroleum 21 fires and during fire training exercises (Amec Foster Wheeler, 2015). In 1970, the USAF began purchasing 22 and using AFFF containing PFAS (PFOS and/or PFOA) for extinguishing petroleum fires and firefighting 23 training activities (USAF, 2012). AFFF was used at USAF installations in and around fire training areas 24 (FTAs). AFFF also could have been used at other areas within installations, such as in and around hangars 25 that had AFFF fire suppression systems, plane crash and fire emergency response sites, firefighting 26 equipment testing areas, wash racks, areas where fire trucks and/or emergency vehicles were washed, 27 and AFFF storage areas, to name a few. An installation layout map also showing potential PFAS source 28 areas is provided as Figure 1.2-1.
- 29 The installation was placed on USEPA's National Priorities List of sites in 1990. Under the CERCLA 120, a
- 30 Federal Facilities Agreement (FFA) between USEPA Region 1, the Maine Department of Environmental
- 31 Protection (MEDEP), and the USAF, was signed into action January 1991 and amended in 1995. The FFA
- 32 governs the environmental activities being conducted at Loring. Following the signing of the FFA, Loring
- 33 was placed on the U. S. Congress 1991 Base Closure List 1991 and was closed in September 1994.
- 34 After the Base closure in 1994, the Maine State Legislature created the Loring Development Authority
- 35 (LDA) to acquire and manage the properties within the geographic boundaries of Loring. The USAF
- 36 transferred approximately 4,700 acres of land to the United States Fish and Wildlife Service (USFWS) in
- 37 1998 for operation as the Aroostook National Wildlife Refuge (ANWR). Additional land was conveyed to

- 1 construct housing for the local Aroostook Band of Mi'kmaq (Wood, 2018). Current property boundaries
- 2 are depicted by the red and white dotted line in **Figure 1.2-1**.
- 3 Loring is located approximately west longitude 67°89'21" by north latitude 46°94'56" occupying
- 4 approximately 8,704 acres in the community of Limestone, Maine located in Aroostook County (Figures
- 5 **1.0-1 and 1.2-1**). The land surrounding the installation is primarily rural and agricultural. Currently there
- 6 is limited commercial and industrial use at Loring. Use of former base property includes, but is not limited
- 7 to, an inn on Virginia Place, a residential community consisting of a series of rental units managed by a
- 8 single property agent on Manser Road, and several additional homes on Development Drive. Former Air
- 9 Force Base properties are supplied by municipal water. The airflight control tower is not operational.
- 10 Planes landing at Loring are infrequent and are typically unscheduled.
- 11 Parcels within the Loring boundary are now owned by other entities including the ANWR, which is open
- 12 to the public for recreational use in designated areas. A large parcel to the south is owned by the Mi'kmaq
- 13 and is depicted on Figure 1.2-2.
- 14 Loring lies in the lower Aroostook River Basin. Topography of the basin is typified by a succession of
- 15 gently rolling to steeply sloping ridges separated by narrow valleys. Elevations of the ridges range from
- 16 600 to 800 feet (ft) above sea level (referenced elevations are based on the National Geodetic Vertical
- 17 Datum [NGVD]). Narrow swamps and bogs extend between the ridges. The valleys range in elevation
- 18 from 500 to 600 ft above the NGVD (ABB, 1997a,b).
- 19 Loring is split by a bedrock groundwater divide (Figure 1.2-3) and by an overburden divide (Figure 1.2-4).
- 20 These divides define the natural drainage basins. Butterfield Brook Drainage (Figure 1.2-5) generally lies
- 21 to the east of the runway, and the Greenlaw Brook Drainage (**Figure 1.2-6**) lies generally to the west.
- 22 The Butterfield Brook Drainage Basin (Figure 1.2-5) is composed of storm sewers, open drainage ditches,
- 23 and unnamed streams that flow into East Loring Lake or Butterfield Brook, and eventually into Durepo
- 24 Reservoir and Limestone Stream. The southeastern portion of Loring drains into the main stem of
- 25 Limestone Creek Source through Noyes Pond. Source areas within the Butterfield Brook Drainage Basin
- 26 or source areas which could drain into Butterfield Brook via surface runoff or storm sewer conveyance
- 27 include:
- FTA (Area 1),
- Part of the Nose Dock Area (Areas 10, 11, 12, 13, 14, and 15),
- 30 Fuel Dump Area (Area 17),
- Part of the Main Runway Foaming Area (Area 18),
- 32 B-52 Crash Area (Area 19), and
- Former Jet Engine Test Cell Area (Area 24).

34 The Greenlaw Brook Drainage Basin (Figure 1.2-6) is composed of storm sewers, open drainage ditches,

35 and unnamed streams that drain the majority of Loring west of the groundwater divide (Figures 1.6-1

- 36 and 1.6-2). Source areas within the Greenlaw Brook Drainage Basin or source areas which could drain
- 37 into Greenlaw Brook via surface runoff or storm sewer conveyance include:

- 1 Landfill (LF) No. 2 (Area 2)
- LF No. 3 (Area 3)
- 3 Base Supply (Area 4)
- 4 Structural Fire Station (Area 5)
- 5 Fire Department Training/Burn House (Area 6)
- 6 Crash Fire Station (Area 7)
- 7 Arch Hangar (Area 8)
- 8 Jet Engine Maintenance Building (Area 9)
- 9 Part of the Nose Dock Area (Areas 10, 11, 12, 13, 14 and 15)
- 10 Fuel Tank Farm (Area 16)
- 11 Part of Area 18 Main Runway Foaming Area (Area 18)
- 12 B-52 Crash Area (Area 20)
- 13 Flight Line Drainage Ditch and Industrial Wastewater Treatment Facility (Area 21)
- Wastewater Treatment Plant (Area 22)
- 15 Base Laundry (Area 23)

Some source areas (e.g., B-52 Crash Area) could affect both drainage basins since surface water runoff
 does flows in a different direction than groundwater. One of the potential PFAS study areas (Base Supply

- 18 Area 4) had no documented storage or releases of AFFF and was previously removed from the RI and
- 19 will not be further evaluated in the ERA.

20 1.3 INVESTIGATION HISTORY UNDER THE INSTALLATION RESTORATION PROGRAM

Under the FFA for Loring, 15 Installation Restoration Program (IRP) Operable Units (OUs) were established according to geographic location, disposal type (e.g., landfill), or affected media. The primary contaminants of concern (COCs) at the site were chlorinated solvents including chlorinated volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and certain total petroleum hydrocarbon (TPH) compounds. Separate RI and Feasibility Study (FS) reports were prepared for each OU. The IRP sites and AFFF release sites are depicted in **Figure 1.3-1**.

27 Eleven Records of Decision (RODs) were completed at Loring describing site cleanup plans between 1994

28 and 1999 (ABB, 1994, 1996 and 1997; and HLA, 1998 and 1999). An amendment to the OU 12 ROD was

29 completed in 2018 for vapor intrusion (USAF, 2018).

30 Construction work required under each ROD has since finished. Remedy optimization, operation and 31 maintenance, and long-term monitoring work are ongoing until cleanup goals have been met for fuels and 32 solvent related contamination. There are several Groundwater Management Zones (GMZs) implemented 33 as remedy components in final RODs as permanent Land Use Controls/Institutional Controls (LUC/ICs). 34 These are discussed further in subsequent sections. The USAF is responsible for 5-Year Reviews (FYRs) at 35 the Site where the purpose is to evaluate and determine if the implemented remedies are and will 36 continue to be protective of human health and the environment. Five FYRs have been completed and the 37 latest was conducted in 2020 (Aptim, 2020).

Three previous IRP Sites at Loring have been addressed during previous programs and are reported to
 have used AFFF or received soils that may have been exposed to AFFF. The location of the former sites
 with AFFF use are discussed below. A more detailed description of each of these sites is provided in Section
 5 of the RI Work Plan (Wood, 2022):

- FTA (IRP Site FT-07) was used for fire training exercises, where AFFF was the primary extinguishing agent used between 1970 and 1989. The site consisted of a mock aircraft located in a bermed circular unlined pit. During training exercises, waste fluids consisting of fuels, oils, and solvents were released into the FTA pit, ignited, and extinguished (HLA, 1999a). Extensive excavation has occurred at this location and soils were disposed in LF-3.
- 10 LF-2 (IRP Site LF-02) is unlined and may have received impacted soil from industrial areas on the • 11 installation where AFFF may have been used; however, no specific AFFF disposal was 12 documented. The selected source control remedial action for LF-2 in the OU2 ROD (ABB, 1994) is 13 containment using a low-permeability cap. The cover system was designed in accordance with 14 Resource Conservation and Recovery Act (RCRA) Subtitle C and Maine Hazardous Waste 15 Regulations. Site preparation for the cover system began in 1994, and the cover system was 16 constructed in 1996. The landfill was closed with the construction of the RCRA cap. A developed 17 rural area exists on the west side of Loring, which is downgradient of LF-2. LF-2 lies in the apparent 18 upgradient vicinity of a residence in the Town of Caribou where sampling of one private water 19 supply well indicated either non-detect or low concentrations of PFOS and PFOA below the 2016 20 USEPA lifetime Health Advisory (HA) and the Maine Maximum Exposure Guidelines (MEGs) during 21 sampling rounds in 2015, 2016, and 2017.
- 22 LF-3 (IRP Site LF-20) is unlined and received contaminated soils excavated from FT-07, which has • 23 documented AFFF use. The remedial control selected for this landfill in the OU2 ROD (ABB, 1994) 24 uses a low-permeability cap. The cap was designed in accordance with RCRA Subtitle C and Maine 25 Hazardous Waste Regulations. Installation of the cap was completed in 2000. A developed rural 26 area which relies on private drinking water is located proximal to the western boundary of Loring 27 which is downgradient of LF-3. LF-3 lies in the apparent upgradient vicinity of two residences in 28 the Town of Caribou where private well sampling was conducted: one in 2015 and one in 2017. In 29 addition, a multi-resident supply well located downgradient of LF-3 in the rural Westgate area 30 was sampled in 2015, 2016, and 2017. The well's 1,000 ft wellhead protection zone falls within 31 the former installation boundary. Analysis of drinking water collected from the three private wells 32 (two private residential wells and one multi-residence private water supply well) indicated low 33 concentrations of PFOS and PFOA below the 2016 USEPA lifetime HA/Maine MEGs.

34 In 2006 the Agency for Toxic Substances and Disease Registry (ATSDR) developed a health consultation 35 (ATSDR, 2006) to address concerns expressed by the Mi'kmag about the safety of using plant and animal 36 resources from Loring lands. The objective of the evaluation was to provide perspective about whether 37 the COCs at Loring are likely to accumulate in plant and animal resources traditionally used by the 38 Mi'kmaq. COCs include metals (barium, cadmium, lead, mercury, silver, and zinc), pesticides (chlordane, 39 DDT [dichlorodiphenyltrichloroethane], DDD [dichlorodiphenyldichloroethane], DDE and

[Dichlorodiphenyldichloroethylene]), PCBs, PAHs, and petroleum compounds. ATSDR presented
 observations based on literature reviews about the potential for exposure to contaminants from certain
 traditional Mi'kmag practices and came to the following conclusions:

- Ingestion of soil presented the highest potential for risk at sites contaminated with heavy metals.
- Workers (basket weavers and/or plant harvesters) may inhale substantial amounts of soil dust
 due to working in an enclosed environment.
- Plant materials present a potential risk if they are consumed for medicinal purposes, used for dyes
 or paints (including cosmetics and face paint), or burned in sweat lodges (volatilization of
 contaminants into the air).
- Root crops and low-lying plants grown in contaminated soil are likely to be more harmful than
 plants and crops that are higher from the ground because crops that grow higher from the ground
 are not a significant exposure source to contaminants in the soil.
- Animal skins and furs may contain high levels of mercury according to literature review.

14 In 2012 the USAF issued guidance on sampling for emerging contaminants PFOS and PFOA (USAF, 2012).

15 As a result, the USAF conducted a Preliminary Assessment (PA) in 2015 (Amec Foster Wheeler, 2015) to

16 evaluate the handling, storage, and usage of AFFF containing PFOS and PFOA at Loring. The PA evaluated

- 17 22 potential AFFF areas and recommended 21 for further investigation and characterization. Based on the
- 18 PA, a Site Inspection (SI) was completed in 2018 (Wood, 2018). The SI included sampling of soil, surface
- 19 water, sediment, groundwater monitoring wells, private wells, and public water supply wells. Fish tissue
- 20 was also collected and analyzed during this effort. The results of the PA and the SI are further summarized
- 21 in Section 1.8 of the RI Work Plan (Wood, 2022).

22 1.4 PFAS USE AND INVESTIGATION AT LORING

Since 2013, several PFAS investigations have been completed at the Site. These investigations are listed
 along with a summary of key findings or actions in Section 1.8 of the RI Work Plan (Wood, 2022). The
 SLERA will consider PFAS analytical results from soil, surface water, sediment, pore water, and
 groundwater collected from each of these investigation as well as data collected during the RI.

27 **1.5 STAKEHOLDER INVOLVEMENT**

A Restoration Advisory Board is not currently active for the Site, however efforts to engage the local
 community are on-going. These stakeholder involvement efforts have focused principally on public health
 concerns and have not specifically covered ecological topics, as summarized below.

Two questionnaires were sent in May/June 2022, one to local residents residing within Loring to better understand recreational use at Loring. Residents were also asked about their level of interest for further community involvement regarding the RI. The second questionnaire was sent to local farmers in an effort to identify the source of irrigation water for commercial crops (i.e. groundwater or surface water) and related information. A public information session was held on 8 June 2022 in the town of Limestone. It was noted at the public meeting that much of the irrigation infrastructure directly to the east of Loring is 1 using surface water.

- 2 USAF and WSP held a meeting with the Mi'kmaq on 9 September 9 2021 to discuss exposure scenarios for 3 consideration on the parcels within Loring owned by the Mi'kmaq. The Mi'kmaq indicated that future 4 planned uses of the parcels include primarily commercial/industrial uses such as a pellet mill, which may 5 require use of groundwater and potentially developing a campground, which could include a potable well. 6 There are no current residential or recreational uses and no plants or animals are currently harvested as 7 the Mi'kmag prohibits hunting and foraging; however, there are no land-use controls in the form of deed 8 restrictions on the land preventing traditional cultural exposure scenarios such as harvesting wild plants. 9 The Mi'kmag provided attendees with a copy of the Maine First Nation Exposure Scenarios: Wabanaki 10 Traditional Cultural Lifeways Exposure Scenario (Harper & Ranco, 2009). The Mi'kmaq also indicated that 11 certain EPA default exposure assumptions such as lifetime scenarios are not necessarily appropriate for 12 First Nations, as USEPA assumes a resident typically lives in one place for 26 years, however a member of 13 the Mi'kmag are expected to live in one place for their full lifetime. The exposure document was used in 14 conjunction with the information obtained at the meeting to draft exposure scenarios for these parcels, 15 which in turn provides the basis for the CSM discussed in the next section. The CSM was communicated 16 to the Mi'kmaq on 25 January 25 2022. 17 A second meeting was held on 8 June 2022 with USAF, USEPA, MEDEP, WSP and the Mi'kmaq. The 18 proposed exposure scenarios were discussed. Additionally, the Mi'kmaq expressed a need for technical 19 assistance in reviewing risk assessment documents. The Mi'kmaq raised concerns about hunting moose
- on the property and WSP suggested reaching out to Maine Fish & Game to identify whether any Agencyled PFAS sampling was being considered. Reaching out to the ANWR was also suggested to see if a joint effort might be possible. The discussion also focused on proposed sample collection on the Mi'kmaq property. WSP will work with the Mi'kmaq to identify additional sampling areas within their parcel where specific plants that would be attractive for harvesting may grow, such as fiddlehead ferns, muskrat root,
- and Labrador tea. These topics will be primarily addressed via the baseline human health risk assessment(BHHRA).

27 **1.6 REPORT LAYOUT**

28 In accordance with USEPA guidance the ERA will be comprised of the following sections:

- Tier I SLERA, presented in Section 2;
- Tier II BERA– Step 3 Refinement of Risk Estimates, presented in Section 3;
- Uncertainty Assessment, presented in Section 4; and
- A discussion of ecological risk assessment exit criteria in Section 5.
- 33

2.0 TIER I SCREENING LEVEL ECOLOGICAL RISK ASSESSMENT

A SLERA includes four primary phases: (1) problem formulation, (2) exposure estimate, (3) evaluation of
 ecological effects, and (4) risk characterization. An ecological CSM is developed during the problem
 formulation phase to help understand exposure at the Site and to help select assessment and
 measurement endpoints.

6 2.1 SCREENING-LEVEL PROBLEM FORMULATION

7 The problem formulation provides the framework upon which the risk assessment is organized. The8 problem formulation step includes the following elements:

9

• A description of the facility's operating and investigation history and known releases.

10 A description of the environmental setting and natural communities associated with terrestrial • 11 and freshwater aquatic habitats, including the presence of any state or federally threatened or 12 endangered species. The environmental setting discussion will be informed by a visit to the Site 13 by a field ecologist to characterize habitat, flora and fauna. The environmental setting will also be 14 informed by a review of data obtained from agency sources such as National Wetland Inventory 15 maps, USGS soil maps, state and federal wildlife surveys, and information collected during other 16 phases of investigation at the Site such as groundwater transport maps, seep maps, and wetland 17 delineations. Descriptions of environmental setting presented in ecological risk assessments 18 previously conducted at Loring legacy IRP sites may considered, as appropriate.

- 19 A summary of PFAS data obtained during historical investigations and the RI. Analytical data 20 collected during the planned RI and deemed usable following data validation and according to the 21 project-specific Quality Assurance Program Plan will be evaluated in the SLERA. Previously 22 collected relevant data adequately validated and deemed usable at the time of collection will also 23 be evaluated. Data will be summarized and presented in tables listing detected analytes, 24 frequency of detection, range of detection limits (laboratory reporting limits) for non-detects, 25 maximum and average concentration for each detected analyte, and location of the maximum 26 detection. Average concentrations will be calculated using one-half the reporting limit for non-27 detected concentrations (i.e., U-qualified data).
- A description of contaminant fate and transport mechanisms that affect contaminant migration
 from source areas to receiving media and ecological receptors.
- A brief summary of toxicity profiles for detected analytes. Considering that studies exploring toxicity mechanisms and effects in ecological receptors for almost all PFAS are scarce, the toxicity profile summary is anticipated to be a general description of the adverse effects that may be experienced by ecological receptors exposed to the PFAS chemical family and will not be more than a paragraph in length.
- An ecological CSM that illustrates the initial assessment of fate and transport mechanisms of
 chemical constituents, complete exposure pathways (including potentially affected dietary

- items), and primary and secondary receptors. The ecological CSM will be developed as part of the ERA
 work plan execution for inclusion in the ERA report and will include all direct contact pathways with
 contaminated abiotic media (soil, groundwater, surface water, pore water, sediment) and indirect pathways
 due to uptake from food items (food chain pathways). If an exposure pathway is not complete for a
 specific chemical constituent, that exposure pathway would not be evaluated further.
- 6 Identification of assessment and measurement endpoints. Assessment endpoints in the SLERA 7 define ecological attributes that are to be protected. Measurement endpoints are measurable 8 characteristics of those attributes that can be used to gauge the degree of actual or potential 9 impact. Assessment endpoints most often relate to attributes of biological populations or 10 communities. They contain an entity (e.g., invertebrate populations) and an attribute of that 11 entity (e.g., survival rate). The entity in the assessment endpoint is typically a population or 12 community. In the case of specially protected species, the assessment endpoint frequently 13 focuses on individuals. Measurement endpoints are related to the assessment endpoint and the 14 effects that can be measured or observed (e.g., comparison with no-effects concentrations). Table 15 **2.1-1** presents the assessment and measurement endpoints that will be evaluated in the SLERA.

16 The initial screening level problem formulation will include the evaluation of potential exposures to all 17 applicable representative ecological receptors and environmental media. The screening process will 18 identify media and pathways for additional evaluation.

- 19 2.2 SCREENING-LEVEL EXPOSURE ESTIMATE
- This phase of the SLERA identifies exposure areas to be assessed and screening level exposure point concentrations (EPCs).

22 2.2.1 Exposure Areas

- The SLERA will assess risks to the environment. Terrestrial exposures at each of source areas at Loring (Figure 1.2-1) will be assessed individually. Freshwater aquatic (i.e., surface water, sediment, and/or pore water) exposures associated with 17 of the source areas (Area 5, Area 8 through Area 22, and Area 24) will be assessed individually. Freshwater aquatic exposures within the off-Base Butterfield Brook Drainage Basin (Figure 1.2-5) and Greenlaw Brook Drainage Basin (Figure 1.2-6) which occur outside of the boundaries of Loring will also be assessed.
- 29 Although there is no direct exposure to groundwater by ecological receptors, groundwater discharging to
- 30 surface water may result in a complete exposure pathway. If the groundwater exposure pathway is found
- 31 to be complete, groundwater associated with source areas will also be evaluated.

32 2.2.2 Screening Level Exposure Point Concentrations

- For each terrestrial exposure area, soil EPCs for PFAS will be calculated as the maximum concentration
 from the 0-2 ft below ground surface (bgs) interval which is the zone of predominant biological activity
- 35 (USEPA, 2015). Samples located under buildings or other impervious surfaces will be excluded from the
- 36 EPC calculation because soils under buildings and impervious surfaces are considered to be unavailable to
- 37 wildlife.

For each aquatic exposure area, sediment and pore water EPCs will be calculated as the maximum concentration from the 0–6-inch bgs interval which is the predominant biologically active zones in sediment (USEPA, 2015). Surface water EPCs will be calculated as the maximum concentration in each exposure area. If the groundwater exposure pathway is found to be complete, groundwater EPCs will be calculated as the maximum concentrations in each exposure area.

6 2.3 SCREENING LEVEL EFFECTS EVALUATION

7 This phase of the SLERA identifies thresholds of ecological effects, also called benchmark values or 8 screening values, for soil, surface water, bulk sediment, sediment pore water, and groundwater. Following 9 ERAGS, screening values used in the SLERA represent no-observed-effect-concentrations (NOECs), which 10 are concentrations believed to be non-hazardous to receptors. NOECs are determined from chronic 11 laboratory studies in which test organisms are subjected to various concentration (plants, invertebrates) 12 or dose (bird, mammals) levels of individual chemicals.

13 USEPA has not yet developed consensus ecological screening benchmarks for PFAS. Therefore, NOEC

screening values were obtained from Derivation of PFAS Ecological Screening Values (Grippo et al., 2021),

- 15 a technical document developed by Argonne National Laboratory under contract with DoD in coordination
- 16 and consultation with an interagency team of subject-matter experts from across the DoD services
- 17 through the DoD Tri-Services Environmental Risk Assessment Work Group and in collaboration with
- 18 AFCEC. Several ecological risk assessors and environmental scientists from the EPA Ecological Risk
- 19 Assessment Forum and program offices, however, provided technical input and advice. This document
- 20 provides ecological screening levels for eight PFAS compounds (PFBA, PFHxA, PFOA, PFNA, PFDA, PFBS,
- 21 PFHxS, and PFOS) in surface water/pore water and soil as summarized in Table 2.3-1.

22 As of the submittal date of this ERA Work Plan, bulk sediment screening benchmarks protective of direct 23 exposure are not available for benthic receptors (Ankley et al., 2020; Grippo et al., 2021) and wildlife 24 (Grippo et al., 2021). Thus, pore water will be used to assess risks to the benthic community. Because soil 25 and surface water benchmarks include values protective of wildlife dietary ingestion, bird and mammal 26 food chain models will not be conducted as part of the Tier I SLERA. As of the submittal date of the ERA 27 Work Plan, USEPA has proposed Draft National Recommended Water Quality Criteria for PFOS and PFOA. 28 However, these draft criteria are subject to change and so will be considered only if finalized before the 29 SLERA is conducted and submitted.

30 The ERA may consider additional future toxicity values available at the time the ERA is written, if 31 technically appropriate and approved by AFCEC. DoD adopts toxicity values for use across all Service 32 Branches.

33 2.4 SCREENING LEVEL RISK CHARACTERIZATION

The Tier I SLERA will compare EPCs to screening benchmarks protective of terrestrial and aquatic receptors
 to calculate a Hazard Quotient (HQ) as shown in Equation 1:

$$HQ = \frac{EPC}{Benchmark}$$

(Equation 1)

- 1 An HQ < 1 indicates that the chemical constituent alone is unlikely to cause adverse ecological effects and
- 2 may thus be eliminated from further review. An HQ \geq 1 indicates that an analyte will be retained as a
- 3 preliminary COPEC for further evaluation in the Tier II BERA. As of the submittal date of the ERA Work
- 4 Plan, it is not the accepted practice to sum HQs of individual PFAS to calculate a Hazard Index (HI);
- 5 therefore, HIs will not be calculated.

3.0 TIER II BERA – STEP 3 REFINEMENT OF RISK ESTIMATES

2 Ecological risk assessment is an iterative process that allows for and encourages modification as additional 3 site information becomes available. At this stage of the risk assessment process (Tier II Step 3), ERAGS 4 provides for the use of additional calculations, analyses, and data review to help characterize risk (or lack 5 thereof). Technically, Step 3 Refinement is the first step of the Tier II BERA, but several available desktop 6 tools can be applied immediately after the screening-level risk characterization to introduce additional 7 lines of evidence and further refine risk estimates. The Step 3 Refinement is therefore commonly included 8 as part of the SLERA report. The Tier II BERA Step 3 will identify refinement COPECs. Contingent on results 9 of screening level risk estimates calculated using maximum concentrations, it may be appropriate to 10 perform one or more of the following desktop refinement tools including EPC refinement, benchmark 11 refinement, and bounding of risk estimates as described below. Additionally, other tools may be available 12 in the future at the time the ERA is written. If appropriate, the risk characterization and ecological CSM 13 may be updated pending the outcome of these refinement steps.

14 3.1 EPC REFINEMENT

15 The screening-level risk calculation uses the maximum detected concentration of each analyte to calculate 16 an HQ. Maximum detections overestimate concentrations to which a population or community of 17 receptors could be exposed over time and across an exposure area. Comparing average concentrations 18 with benchmarks allows for more realistic estimates of risk to communities or populations of ecological 19 receptors. Typically, the 95th percent of the upper confidence level on the mean (95% UCL) is used to 20 conservatively estimate average, referred to as the central tendency exposure (CTE) EPC. The 95% UCLs 21 would be calculated using the most recent version of ProUCL software, currently version 5.2 (USEPA, 22 2022). If the ProUCL software algorithms determine that there are not enough data to calculate a 95% 23 UCL, the CTE may be estimated using an arithmetic mean, median, or other measure of central tendency.

24 3.2 BENCHMARK REFINEMENT

25 Screening-level risk calculations are made with conservative NOEC-based benchmarks that represent non-26 hazardous concentrations. In contrast, lowest-observed-effect-concentration (LOEC)-based benchmarks 27 represent concentrations at or above which adverse effects are possible. A LOEC is the lowest 28 concentration where an effect has been observed in chronic ecotoxicity studies. LOECs will be derived 29 from the same DoD sources previously cited that provide NOECs (e.g., Grippo et al., 2021). The methods 30 used to derive LOECs will depend on the body of literature available for each specific PFAS compound and 31 will follow industry standards and best practices. LOECs may also be derived from other sources which 32 may be available in the future, if approved by the DoD and USAF.

33 3.3 BOUNDING OF RISK ESTIMATES

34 The screening-level risk characterization calculates an HQ using maximum concentrations and NOEC 35 benchmark. As part of the Tier II BERA Step 3 Refinement step, additional HQs may be calculated using 36 CTE EPCs and LOEC benchmarks. An HQ based on maximum concentrations and NOEC paired with an HQ 37 based on the CTE EPC and LOEC allows a bracketing of risk predictions. The former results in a conservative 1 estimate of risk and the latter are more likely to be associated with actual adverse effects. HQs would be

2 interpreted by considering the magnitude as well as other pertinent toxicological or spatial distribution.

3 3.4 COMPARISON TO BACKGROUND DRAINAGE

4 PFAS concentrations associated with releases in surface water and sediment will also be compared to 5 concentrations collected from two background drainage locations. Background concentrations represent 6 ambient conditions absent site-related releases. Generally, risk management actions are not taken to 7 reduce contaminants to concentrations at or below natural or anthropogenic background levels. Two 8 surface water and sediment background locations have been established as part of the Installation's long-9 term monitoring network, including Prestile Brook and Caribou stream (Figure 3.1-1). Both locations were 10 included in the SI (Wood, 2018) and are being resampled as part of the RI. No terrestrial background 11 sample locations have been established.

4.0 UNCERTAINTY ASSESSMENT

2 The interpretation of risk estimates is subject to a variety of uncertainties that result from the use of 3 assumptions and the lack of information necessary to quantify actual exposure and effects 4 concentrations. The ERA will summarize major uncertainties and assumptions, describe whether 5 uncertainties lead to an over- or under-estimation of risks, and explain steps taken to mitigate those 6 uncertainties. Topics of uncertainty may include exposure concentrations, detection frequencies, data 7 quality (including whether limits or quantitation limits are adequate for evaluating the ecological risks), 8 chemical speciation, the existence of Draft Nationally Recommended Ambient Water Quality Criteria, and 9 underlying biases in the screening benchmarks (e.g., bioavailability, area use factors, diet composition). 10 Uncertainties associated with PFAS currently lacking toxicity information, or potential 11 additive/synergistic/antagonistic effects, will also be qualitatively discussed.

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5.0 ECOLOGICAL RISK ASSESSMENT EXIT CRITERIA

- 2 The Tier I SLERA and Tier II BERA Step 3 may conclude:
- There is sufficient information to assess risks to the environment and the data support no further
 action;
- The data indicate that adverse effects on receptors are possible and there is enough information
 to support corrective measures; or
- There is insufficient information to assess risks to the environment and additional information is
 needed to reduce uncertainty.
- 9 Selection of the outcome will depend on several factors including but not limited to: the distribution and
- 10 frequency of detections, the magnitude of NOEC and LOEC HQs, whether or not nature and extent have
- 11 been sufficiently defined, or how additional lines of evidence such as the use of food chain models that
- 12 rely on site-specific measurement of PFAS in plant or animal tissue might affect findings and affect
- 13 management decisions.

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FIGURES

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F-1 F-1	
Notes: BIA = Buerau of Indian Affairs DFAS = Defense Financing and Accounting Service LDA = Loring Development Authority MEARNG = Maine Army National Guard USFWS = United States Fish and Wildlife Service SYMBOL KEY Approximate Parcel Boundaries: DFAS Parcel (A) USFWS Parcels (E, E-1) Surface Water Bodies USFWS Parcels (B, 1, 2, 3 and Br 5, 6, 7)	Image: Contract of the set of the s
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TABLES

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Table 2.1-1SLERA Assessment & Measurement Endpoints

Ecological Risk Assessment Work Plan Former Loring Air Force Base Limestone, Maine

Assessment Endpoint	Measurement Endpoint							
Terrestrial Exposure Areas								
1. Protection and maintenance of populations of terrestrial plants typical to the area.	a. Compare chemical concentrations measured in soil to screening benchmarks protective of terrestrial plants.							
2. Protection and maintenance of the soil invertebrate community.	 a. Compare chemical concentrations measured in soil to screening benchmarks protective of soil invertebrates. 							
3. Protection and maintenance of populations of herbivorous, invertivorous, and carnivorous birds typical to the area.	a. Compare chemical concentrations measured in soil to screening benchmarks protective of dietary and incidental soil ingestion.							
4. Protection and maintenance of populations of herbivorous, invertivorous, and carnivorous mammals typical to the area.	a. Compare chemical concentrations measured in soil to screening benchmarks protective of dietary and incidental soil ingestion.							
Aquatic Exp	osure Areas							
5. Protection and maintenance of the water column aquatic community (plants, invertebrates, fish) typical to the area.	 a. Compare chemical concentrations measured in surface water to screening benchmarks protective of aquatic life. b. If groundwater exposure pathway is found to be complete, compare chemical concentrations measured in groundwater to screening benchmarks protective of aquatic life. 							
6. Protection and maintenance of the benthic community typical to the area.	a. Compare chemical concentrations measured in sediment pore water to screening benchmarks protective of aquatic life.							
7. Protection and maintenance of populations of herbivorous, piscivorous, invertivorous, and omnivorous birds typical to the area.	a. Compare chemical concentrations measured in surface water to screening benchmarks protective of dietary and incidental surface water ingestion.							
8. Protection and maintenance of populations of herbivorous, invertivorous, piscivorous, and omnivorous mammals typical to the area.	a. Compare chemical concentrations measured in surface water to screening benchmarks protective of dietary and incidental surface water ingestion.							

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Table 2.3-1No Observed Effect Concentration Screening Benchmarks

Ecological Risk Assessment Work Plan Former Loring Air Force Base Limestone, Maine

				Surface Water/Pore Water Benchmarks by Receptor Freshwater			
Analyte		Soil Benchmar	ks by Receptor				
(mg/kg)	Terrestrial Plants (mg/kg)	Soil Invertebrates (mg/kg)	Terrestrial Birds (mg/kg)	Terrestrial Mammals (mg/kg)	Aquatic Life (µg/L)	Aquatic- dependent Birds (μg/L)	Aquatic- dependent Mammals (μg/L)
PFBA	-	-	-	2.98	64.6	-	8,370
PFHxA	-	-	-	6.20	28.8	-	2,210
PFOA	79.5	22.4	-	3.84	307	-	1,580
PFNA	-	10	-	0.0242	16.4	-	2.08
PFDA	-	-	-	0.0677	2.94	-	0.66
PFBS	-	100	15.8	0.817	400	88,600	5,710
PFHxS	-	10	-	0.0028	65.3	-	5.50
PFOS	40.2	48.1	0.0386	0.0087	22.6	2.57	0.117

Notes:

Source: Grippa et al. (2021) Table ES-3

µg/L = micrograms per Liter

mg/kg = milligrams per kilogram

PFBA = Perfluorobutanoic acid

PFHxA = Perfluorohexanoic acid

- PFOA = Perfluorooctanoic acid
- PFNA = Perfluorononanoic acid

PFDA = Perfluorodecanoic acid

PFBS = Perfluorobutanesulfonic acid

PFHxS = Perfluorohexanesulfonic acid

PFOS = Perfluorooctanesulfonic acid