



**TOWN OF WAYLAND**  
41 COCHITUATE ROAD  
WAYLAND, MASSACHUSETTS 01778

**MEMORANDUM**

To: Board of Selectmen  
From: Louise Miller, Town Administrator  
Cc: Board of Public Works  
Board of Health  
John Bugbee, Assistant Town Administrator  
Thomas Holder, Public Works Director  
Don Millette, Water Superintendent  
Julia Junghanns, Health Director  
Michael McCann, Information Technology Director  
Date: April 13, 2020  
Re: MassDEP Notice of Non-Compliance Receipt and Next Steps

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MassDEP Notice of Non-Compliance

As anticipated in the memorandum dated April 5, 2021, regarding status of PFAS in Wayland Public Water Supply, the Town received a Notice of Non-Compliance (NON) from the MassDEP on April 9, 2021, due to PFAS levels in its Happy Hollow wells higher than the MassDEP maximum contaminant level (MCL) of 20 parts per trillion for three consecutive months.

Short-term Response Requirements

The NON requires that (1) by May 7, 2021, Wayland provide a second public notice document to all residents, according to the MassDEP template, and (2) by May 10, 2021, Wayland provide, to MassDEP for review and approval, a written plan of how and when the Town will come into compliance with the PFAS regulations. The written plan due May 10, 2021, must explain whether Wayland can discontinue the source of water with elevated PFAS levels, blend the source with other sources, adjust treatment processes, and/or obtain water from another public water supplier. If the Town is unable to implement a short-term solution, then the Town must provide an alternative source of water for drinking and cooking for the sensitive population served (pregnant or nursing women, infants, and people diagnosed with a compromised immune system). The alternative source of water may include providing bottled water, vending machines, or water bill rebates.

Long-term Response Requirements

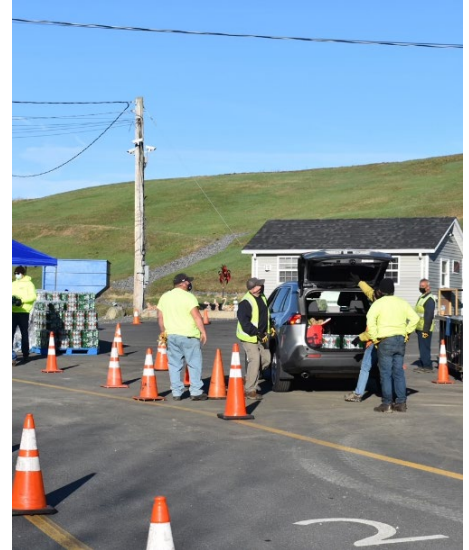
By June 8, 2021, Wayland must submit a long-term corrective action plan to reduce and maintain PFAS6 levels below the MCL. The Town may evaluate the construction of an interconnection with another public water system, construction of a new treatment facility, the addition of PFAS6 treatment to the Town's existing water treatment facility and/or the installation of a new well. Wayland's plan must include alternative analysis, with a feasibility evaluation, an effectiveness determination, cost estimates, and an implementation schedule. The plan must be approved by MassDEP. MassDEP further requires that the Town retain a Massachusetts Registered Professional Engineer with expertise in drinking water.

## Town's Actions to Date and Next Steps

### Short-term Response

The Town does not anticipate being able to come into compliance with PFAS6 regulations in the short-term. The Town cannot discontinue use of the Happy Hollow wells, because they provide approximately half of the Town's water supply nor is there a way in which the Town could blend the supply from the different wells. Additionally, the Town will not be able to obtain sufficient water in the immediate future from another public water supplier.

The Town has, therefore, already begun a plan for providing an alternative source of water for drinking and cooking for the MassDEP identified sensitive population. The Town's immediate plan is distribution of bottled water on a weekly basis to all Wayland households. The distribution provides for 2 possible weekly pick-ups of the allocated bottled water, on Wednesday or Sunday, with additional water available at the Public Safety Building during other times. In addition, bottled water is being provided to the Town's public schools, private day cares, nursing homes, private schools, any others that identify themselves as needing to be provided with water. While the distribution of water can be accomplished in the short-term, a large amount of resources is required, both from a financial and a manpower standpoint. The distribution effort is conservatively anticipated to total approximately \$25,000 per week and requires that Public Works staff be redirected from other activities, including Parks and Highway to meet the staffing needs. The Town has also reached out to CERT (Citizen Emergency Response Team) and MRC (Medical Reserve Corps) volunteers and is coordinating volunteer duties to supplement Town staff. The short-term provision of water will be reviewed and options for a combination of water distribution and rebates presented to the Board of Public Works at a future meeting.



### Long-term Response

The Town has divided the long-term response into 3 components: (1) implementing treatment of PFAS6, (2) connecting to MWRA, both in the short-term and long-term, and (3) investigating the potential sources of PFAS6 for elimination. Below is the outline of the issues raised by each of the 3 components. The Town has retained 3 engineering firms to work on each of these issues. Tata and Howard, Kleinfelder, and Weston and Sampson.

### PFAS6 Treatment

Tata and Howard is looking at the treatment concept. There are 2 options being reviewed: ion exchange and granular activated carbon. The experience of other communities is being reviewed as well as the feasibility of implementing treatment in Wayland at Happy Hollow. Of additional concern is the possibility that the Chamberlain wells may also require treatment. While the Chamberlain wells have not exceeded the MCL for PFAS6, there are PFAS6 in the wellfield at levels close to the MCL. Very preliminary cost estimates for treatment are \$1.2 million at Happy Hollow and \$600,000 at Chamberlain. On-going operating expenses associated with the treatment concept will need to be evaluated, including staffing and disposal of PFAS6.

### MWRA Connection

Tata and Howard is investigating a short-term connection to MWRA by connecting to the Hultman aqueduct. This would require a temporary pump station. Questions regarding whether it is possible to partially supply the Town with MWRA water is still being investigated, because of blending issues related to the different water treatment processes between MWRA and Wayland. A redundancy plan for supplying the Town with water would also have to be developed if the Town relies exclusively on MWRA, since any interruption in water service would be catastrophic. One potential route for redundancy is a connection to Weston. The valve at the Weston connection, however, has not been exercised in many years and an inter-municipal agreement with Weston would need to be developed. An estimate of the potential costs of short-term MWRA connection is not known at this time.

Kleinfelder is studying a long-term connection to MWRA. The connection point would be different from the short-term connection. The Town would then abandon its drinking water wells in the long-term. Connecting to MWRA would eliminate the long-term risk of other chemicals being added to the list of chemicals to be removed from the Town's water supply. EPA and MassDEP are researching additional PFAS chemicals and may implement additional restrictions. Should the Town decide to connect to WMRA in both the short and long-term, MWRA has stated that it would credit the Town with any short-term costs against the long-term connection fee. A cost of estimate for a long-term connection to MWRA has not yet been developed nor have the long-term operating expenses of being an MWRA community.

### Potential Sources of PFAS6

Many questions have been raised regarding the potential sources of PFAS6 near the Happy Hollow wells. Data from testing of monitoring wells at the High School Fields has been made available and will be posted on the Town's website. Weston and Sampson is reviewing hydrogeological data regarding groundwater movement in the Happy Hollow wellfield and potential sources for PFAS6.

Given detectable levels of PFAS6 in the Chamberlain wellfield as well, the Town may consider a study of the groundwater movement in that wellfield.

### Financing and Procurement

Wayland has received guidance from the Commonwealth Department of Revenue (DOR) as well as from its financial advisor regarding the mechanism for covering the unanticipated expenses of PFAS6. The Town Administrator will be speaking with the Board of Public Works, Board of Selectmen, Town Moderator and Town Counsel regarding possibly amending the capital appropriation for the Water Enterprise Fund at Town Meeting to reflect potential solutions to the NON. This would require the Finance Committee offering a substitute main motion for the omnibus budget to increase the Town's debt authorization and adding a capital item line for borrowing from the Water Enterprise Fund. The Town's Board of Selectmen may also be asked to declare a state of emergency, if necessary, to address any potential deficit spending in FY2021.

The Town may also ask MassDEP to declare a state of emergency in Wayland based on the PFAS6 NON. This would allow Wayland to access certain federal and state grants and loans that would not otherwise be available and to shorten procurement timelines.