



## 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  
Finance Committee  
John Bugbee, Assistant Town Administrator  
Thomas Holder, Public Works Director  
Don Millette, Water Superintendent  
Julia Junghanns, Health Director  
Michael McCann, Information Technology Director  
Ben Keefe, Public Buildings Director  
Linda Hansen, Conservation Agent  
Date: April 26, 2020  
Re: MassDEP Notice of Non-Compliance Response Update

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#### MassDEP Notice of Non-Compliance

This memorandum updates the memorandum of April 13, 2021, regarding the Town's response to the Notice of Non-Compliance (NON) received from the MassDEP on April 9, 2021, due to PFAS levels the Town's Happy Hollow drinking water supply wells higher than the MassDEP maximum contaminant level (MCL) of 20 parts per trillion for three consecutive months.

#### Short-term Response Requirements

##### Public Notice Document

The Public Works Director has prepared a second public notice document to be sent to all residents, according to the MassDEP template. A draft has been submitted to MassDEP. A copy will be provided to the PFAS working group in advance of printing and mailing, and a press release may be drafted as appropriate.

##### Short-term Compliance Plan

The Public Works Director continues to work with Tata and Howard to prepare, by May 10, 2021, the written short-term plan of how and when the Town will come into compliance with Mass DEP PFAS regulations. A preliminary document with cost estimates will be available in the first half of the week of April 26, 2021. Tata and Howard is evaluating options for treating for PFAS and will provide a cost and operational comparison between treating and temporarily connecting to MWRA. No decision on a preferred option is required by May 10. We anticipate that the preliminary Tata and Howard report will be reviewed and discussed by relevant boards in the coming weeks. Regardless of which option is selected, we anticipate that a short-term solution will be implemented in the fall (September – October).

The Public Works Director and Water Superintendent have investigated a short short-term solution that could be implement in 4-5 weeks that would allow the Town to reduce PFAS6 levels to below 20 ppt at the Happy Hollow wells. The short short-term solution involves a trailer-mounted system for treatment of the water. This treatment would be in addition to the treatment at the Happy Hollow wells. Because piping to and from the trailer would be exterior, this solution is weather dependent and could not be in effect past mid-fall (October). This short short-term solution was discussed with MassDEP who confirmed that implementation and test results below 20 ppt would allow the Town to come out of non-compliance.

In the meantime, the Town must provide an alternative source of water for drinking and cooking for the sensitive population served by the Town's public water supply (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. On April 7, the Town began making bottled water available 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, and any others that identify themselves as needing to be provided with water. While the distribution of water can continue to 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. Additional staffing is being provided by the Police and Fire Departments. 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 Public Works Director has prepared a separate memorandum to the Board of Public Works reviewing options for continuing to provide bottled water versus offering water bill rebates. The Board of Public Works is anticipated to review, discuss, and vote on continuation of bottled water distribution, water bill rebates, or a combination of the two at a meeting scheduled for April 27, 2021.

The Town has briefly reviewed water filling stations, but these do not seem practical from a health perspective during the pandemic.

#### Long-term Response Requirements

The Town has contracted with Kleinfelder to work on the Town's long-term corrective action plan to reduce and maintain PFAS6 levels below the MassDEP regulated levels. The long-term plan is due to MassDEP by June 8, 2021. The Town will evaluate the construction of a permanent interconnection with MWRA and the addition of PFAS6 treatment to the Town's existing water treatment facility at Happy Hollow, and potentially at Chamberlain. Wayland's plan must include alternative analysis, with a feasibility evaluation, an effectiveness determination, cost estimates, and an implementation schedule. We anticipate beginning work on the design of a long-term response in the September-October time frame, once the short-term solution has been implemented.

#### Potential Sources of PFAS6

Weston and Sampson is investigating the potential sources of PFAS6 near the Happy Hollow wells. Existing data from testing of monitoring wells at the High School Fields has been made available on the Town's website. The location of additional monitoring wells is being evaluated. At this time, given the level of PFAS detected, it does not appear that there will be a single source identified. Potential local

environmental sources being explored include the High School wastewater plant leaching field, townwide septic systems, firefighting foam, as well as potential groundwater and surface water sources. Because PFAS testing requires 2-3 weeks for results to be available, we anticipate that preliminary findings regarding potential sources will be available in 8-10 weeks

### Financing and Procurement

A four board meeting is scheduled for May 3, 2021 with the Board of Public Works, the Board of Health, Finance Committee, and Board of Selectmen, to review funding needs in FY2021 and to review and approve a capital request and funding for FY2022.

The Town will file for DCAMM emergency waiver of certain procurement requirements to allow for the expedited implementation of the short-short term solution, and possibly the short-term solution as well.

### Town of Natick – Potential MWRA Partner

Among other communities, the Town of Natick is experiencing elevated PFAS levels in their drinking water supply wells. MassDEP has invited Natick to join in conversations with Wayland regarding the potential connection to MWRA both in the short and long-term. Natick does not have direct access to the MWRA. Should the Board of Public Works choose the MWRA connection as a solution, then the Board of Selectmen would need to enter into an inter-municipal agreement with the Town of Natick to provide MWRA water to Natick through Wayland.

### Weston Connection – Not Usable

It has been determined that the Weston connection to the MWRA cannot be used at this time. Issues with the connection include the age of the water valve, which has not been exercised in many years, and the water pressure in the Weston supply from MWRA, which would not allow sufficient water distribution to both Weston and Wayland.

### Potential Municipal Consortium

We have been contacted by other municipalities regarding the possibility of forming a municipal consortium to address the new MassDEP regulations. The collaboration would be similar to the group formed to investigate the possibility of a regional COVID-19 vaccine.