May 1, 2019

Barnstable County
Attn: Jack Yunits, County Administrator
Superior Courthouse
Barnstable, MA 02630

RE: BARNSTABLE (HYANNIS) - BWSC
Release Tracking Number 4-026179
Barnstable County Fire and Rescue Training Academy (BCFRTA)
155 South Flint Rock Road
REQUEST FOR EXPEDITED
IMMEDIATE RESPONSE ACTION
PLAN MODIFICATION/INTERIM
DEADLINE
ENFORCEMENT DOCUMENT
NUMBER
00006694

Dear Mr. Yunits:

The Massachusetts Department of Environmental Protection, Bureau of Waste Site Cleanup (MassDEP), is tasked with ensuring the timely assessment and cleanup of oil and hazardous material releases pursuant to Massachusetts General Law (MGL) Chapter 21E (Chapter 21E). The law is implemented through regulations known as the Massachusetts Contingency Plan, 310 Code of Massachusetts Regulations (CMR) 40.0000 et seq. (the MCP).

REASON FOR THIS LETTER

MassDEP is requesting the Immediate Response Action (IRA) Plan Modification due to be submitted with the August 2019 IRA Status Report be submitted by an expedited deadline established below. In addition, as outlined below, MassDEP is requesting additional work be conducted to reduce/eliminate the amount of precipitation infiltrating through the soil at the Site impacted with per- and polyfluoroalkyl substances (PFAS).
BACKGROUND

On November 21, 2018 MassDEP issued a Notice of Audit Findings/Compliance and Technical Assistance/Interim Deadline Letter to Barnstable County requesting, among other things, that the County evaluate the feasibility of actions to reduce the infiltration of rainwater and fire-training water through soil impacted with PFAS and take measures to increase the capacity of the existing groundwater recovery and treatment system to further reduce the concentration of PFAS migrating from the BCFRTA.

On March 12, 2019, MassDEP received Immediate Response Action Status Report No. 27 (Status Report) stating that, although it is not currently feasible to take response actions to reduce the infiltration of water through impacted soil, a short-term expansion of the groundwater recovery and treatment system is feasible. The system would consist of the installation of a new recovery well at a location where PFAS concentrations in the groundwater are significantly higher than the groundwater now being captured. The groundwater recovered would be treated through a rental treatment system. The Status Report indicated that a definitive IRA Plan Modification for the expansion would be submitted with the next IRA Status Report in August 2019, consistent with the requirements in MassDEP’s November 21, 2018 letter. In addition, it should be noted that the groundwater sampling plan that was referenced in the February 28, 2019 IRA Status report was not appended to the report as stated.

On April 19, 2019, MassDEP published the proposed revisions to the MCP that includes groundwater standards for PFAS. The proposed Groundwater Category GW-1 Standard, which have been established for Current and Potential Drinking Water Source Areas as defined in the MCP, is 20 nanograms per liter (ng/L, which is approximately the same as parts per trillion or ppt) for six PFAS compounds: perfluorooctanoic acid (PFOA), perfluorooctanesulfonic acid (PFOS), perfluorononanoic acid (PFNA), perfluorohexanesulfonic acid (PFHxS), perfluoroheptanoic acid (PFHpA) and perfluorodecanoic acid (PFDA).

On April 29, 2019, Barnstable County announced the suspension of water usage at BCFRTA. MassDEP commends Barnstable County personnel for acting on the concerns of the affected residents and ceasing the use of water and taking this step to reduce the infiltration of water through PFAS-contaminated soil. The cessation of water usage for fire training will also enable the evaluation and resultant implementation of more effective approaches to prevent/reduce infiltration of PFAS and remediate the soil and groundwater, extending the lifespan of granular activated carbon in the treatment systems installed on the Mary Dunn wells.

REQUEST FOR EXPEDITED IMMEDIATE RESPONSE ACTION PLAN MODIFICATION/INTERIM DEADLINE

Given the proposed lower Groundwater Category GW-1 Standard and the fact that the use of the BCFTRA for training activities will cease and therefore not prevent capping of impacted soil, MassDEP is requesting that the BCFRTA submit the IRA Plan Modification originally due with the August 2019 IRA Status Report on or before June 28, 2019. The IRA Plan Modification shall include:

1. A detailed plan for the expansion of the groundwater recovery and treatment system;
2. A detailed plan for capping measures that can be taken to prevent infiltration of precipitation through PFAS-contaminated soil at the Site; and

3. A detailed schedule for implementing the response actions requested above.

MassDEP requests that BCFRTA upload the agreed upon groundwater sampling plan referenced in the IRA Status report. This should be completed on or before **May 6, 2019.**

These deadlines constitute enforceable interim deadlines pursuant to 310 CMR 40.0167.

If you have any questions regarding this Notice, please contact Angela Gallagher at the letterhead address or by calling (508) 946-2790. All future correspondence related to the Site should reference the following Release Tracking Number (RTN): 4-0026179.

Sincerely,

Gerard M.R. Martin  
Deputy Regional Director  
Bureau of Waste Site Cleanup

M/H/AG/lg

CERTIFIED MAIL # 7017 1450 0000 0281 5944

e: Town of Barnstable  
Board of Health  
Board of Selectmen  
Hyannis Water Department  
Hyannis DPW

Licensed Site Professional  
Roger Thibault, BETA group

BCFRTA  
Stephen Tebo, Assistant County Commissioner

DEP-SERO  
Jonathan Hobill, Regional Engineer