



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

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June 1, 2018

Barnstable Municipal Airport
Attn: Mr. Roland Breault, Manager
480 Barnstable Road
Barnstable, MA 02601

RE: **BARNSTABLE (Hyannis)**
Release Tracking Number 4-0026347
Barnstable Municipal Airport
**NOTICE OF AUDIT FINDINGS –
IMMEDIATE RESPONSE ACTION FIELD
INSPECTION**

Dear Mr. Breault:

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 NOTICE

MassDEP has determined that the Immediate Response Action (IRA) that is being conducted by Barnstable Municipal Airport (BMA) complies with the relevant regulations and the IRA Plan that had previously been submitted. MassDEP is also highlighting noteworthy considerations and additional activities/actions for BMA to consider in future response actions. This Notice describes those actions.

AUDIT FINDINGS

On May 14, 2018, MassDEP conducted an audit inspection (the audit) at the above referenced disposal site (the Site). The purpose of the audit was to determine whether the IRA implemented at the Site is being conducted in accordance with the MCP and the Written IRA Plan submitted on December 16, 2016. MassDEP also reviewed the Tier Classification/Phase I Assessment and Phase II Scope of Work submitted on November 10, 2017.

No violations were observed in reference to the IRA Plan. However, based on a review of the aforementioned reports and discussions during the inspection, MassDEP presents the following for consideration during subsequent and future assessment activities and response actions:

- A. The IRA Plan states that de-icing fluids will be analyzed for the presence of 1,4-dioxane. Analytical data has not been provided for the de-icing fluids at this time. However, given that 1,4-dioxane is known to be present in de-icing fluids both past and present, de-icing areas at BMA should be evaluated in future assessment activities as potential source areas for 1,4-dioxane.
- B. The IRA Plan states that a groundwater model will be developed for the Site using existing data from the United States Geologic Service (USGS) to evaluate contaminant transport. The IRA Plan also stated the modeling was to be completed by April 2017. During the inspection, the LSP stated the groundwater modeling report would now be completed as part of the Phase II Comprehensive Site Assessment (CSA). The Phase II CSA Report is due to be submitted on or before November 10, 2020.
- C. One surficial soil sample has been obtained from the area designated as the "1991 drill area" on site plans submitted with IRA Status reports. Additional assessment should be conducted in this area given that PFAS were detected in surficial soil. MassDEP discussed this issue during the inspection.
- D. BMA personnel and their consultant have indicated that the area of PFAS usage has been delineated. However, no analytical data has been presented to MassDEP at this time to confirm that the boundaries of the disposal site have been delineated. Additional soil and groundwater sampling is likely to be required outside of the area where PFAS have already been detected to appropriately evaluate the extent of contamination for the upcoming Phase II CSA.
- E. Currently, BMA is undergoing a geotechnical evaluation to facilitate runway upgrades scheduled for 2020. Note that per 310 CMR 40.0440, a Release Abatement Measure (RAM) Plan may be required prior to completing runway upgrades if soil excavation is to be completed within the disposal site boundaries. If soil is to be excavated and removed, future soil disposal/reuse parameters may need to include PFAS analyses, depending on the determination of the extent of PFAS contamination at the Site.

LICENSED SITE PROFESSIONAL

A copy of this Notice has been sent to the LSP-of-Record for the Site, Mark Nelson at Horsley-Witten Group.

LIMITATIONS

The audit focused on the existing conditions at the Site. MassDEP's findings were based upon the certainty of the information reviewed during the audit. These findings do not: (1) apply to actions or other aspects of the Site that were not reviewed in the audit; (2) preclude future audits of past, current, or future response actions at the Site; (3) in any way constitute a release from any liability, obligation, action or penalty under M.G.L. c. 21E, 310 CMR 40.0000, or any other law, regulation, or requirement; or (4) limit MassDEP's authority to take or arrange, or to require any Responsible Party or Potentially Responsible Party to perform, any response action authorized by M.G.L. c. 21E which MassDEP deems necessary to protect health, safety, public welfare, or the environment.

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): 4-0026347.

Sincerely,



John T. Handrahan
Acting Section Chief
Brownfields, C & E and Risk Reduction Section

M/H/AG/ag

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ec: Town of Barnstable
Board of Health
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Hyannis Water Department
Hyannis DPW

Licensed Site Professional
Mark Nelson, Horsley-Witten Group

DEP-SERO
Millie Garcia-Serrano, Regional Director
Gerard Martin, BWSC Deputy Regional Director
Jonathan Hobill, Regional Engineer

