



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

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

November 10, 2016

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

RE: BARNSTABLE- BWSC
Release Tracking Number: **4-0026179**
Barnstable County Fire and Rescue Training
Academy
**IMMEDIATE RESPONSE ACTION PLAN -
CONDITIONAL APPROVAL**

URGENT LEGAL MATTER: PROMPT ACTION NECESSARY

Dear Mr. Yunits:

The Massachusetts Department of Environmental Protection (MassDEP or the Department), Bureau of Waste Site Cleanup is tasked with ensuring the cleanup of oil and hazardous material releases pursuant to the Massachusetts Oil and Hazardous Material Release Prevention and Response Act (M.G.L. Chapter 21E). This law is implemented through regulations known as the Massachusetts Contingency Plan (310 CMR 40.0000 et seq. – the MCP). Both M.G.L. c. 21E and the MCP require the performance of response actions to provide for the protection of harm to health, safety, public welfare and the environment which may result from releases and/or threats of releases of oil and/or hazardous material (OHM) at disposal sites.

On August 4, 2016, the MassDEP issued a Notice of Responsibility (NOR), Request for Immediate Response Action/Interim Deadline letter (IDL) to Barnstable County for a release of perfluoroalkyl substances (PFAS). PFAS have been identified in soil and groundwater at the Barnstable County Fire and Rescue Training Academy or BCFRTA. Additionally, PFAS have been impacting the abutting Mary Dunn Public Drinking Water Wells owned and operated by the Town of Barnstable.

On September 27, 2016, MassDEP received an Immediate Response Action (IRA) Plan submitted by Barnstable County for the BCFRTA located at 155 Flintrock Road in Hyannis, Massachusetts (the Site). MassDEP also received a Release Notification Form (RNF) for the presence of a potential Imminent Hazard.

The written IRA Plan, prepared by Thomas Cambareri, the LSP employed by the Cape Cod Commission (CCC), proposes the following Immediate Response Actions:

1. Excavation, removal, and disposal of the PFAS soil Hot Spot at BCFRTA;

2. Application of a remedial additive known as RemBind™ (a powdered reagent that consists primarily of activated carbon, aluminum hydroxide, and kaolin clay) to the bottom of the excavation of the Hot Spot to bind any remaining PFAS in the soil and prevent further leaching to groundwater; and
3. Expansion of the existing recovery well system to capture a larger area of PFAS contamination to prevent further migration of contamination to the Mary Dunn Wells and to the east of the Mary Dunn Wells.

The written IRA Plan also proposed additional remedial actions that were being considered outside of the IRA and would potentially be part of Comprehensive Response Actions. For the purposes of this letter, only the aforementioned three items will be addressed.

Among other things, 310 CMR 40.0046(3)(a) states that prior approval by the Department is required for the application of Remedial Additives within 800 feet of any public water supply well field, or within 50 feet of a surface water body or any tributary. Flintrock Pond is located within 50 feet of the proposed area of RemBind™ application. In addition, the Mary Dunn Wellfield, at its shortest distance from the boundaries of the BCFRTA, is located approximately 800 feet east of BCFRTA.

CONDITIONS OF APPROVAL

The provisions described in 310 CMR 40.0420 of the MCP allow MassDEP to provide written approval, conditional approval or denial to all IRA Plans submitted. MassDEP is providing approval at this time for all of the response actions described in the September 27, 2016, IRA Plan, prepared by Cape Cod Commission and summarized as items 1-3 above, with the following conditions:

1. All applications of Remedial Additives must be completed in compliance with 310 CMR 40.0046 of the MCP.
2. Literature about RemBind™ reviewed by MassDEP indicates that the application of this remedial additive may result in the release of metals, as a by-product, to the groundwater. Therefore, as part of the application of this remedial additive, you must monitor the groundwater for the 14 MCP metals, both before and after the application, and both upgradient and downgradient of the application area. In addition, you must monitor the surface water (Flintrock Pond) both before and after the application of RemBind™ for the 14 MCP metals. The 14 MCP metals list may be reduced if your LSP can provide adequate technical justification for eliminating certain metals. Monitoring must also include analyzing the groundwater and surface water for aluminum, dissolved oxygen, pH, and specific conductance. Other constituents should be included if deemed necessary. Note that 310 CMR 40.0046(4)(c) states, in part, that "...groundwater monitoring should occur at regular intervals not to exceed every three months thereafter..."

If any of the parameters outlined above are detected in the groundwater or surface water samples at concentrations significantly above the background concentrations established by the analyses conducted prior to the application of RemBind™, you MUST comply with the following: 1). Notify MassDEP within 72-hours of obtaining knowledge of this condition; 2). Expand the existing recovery well system to allow for complete capture of groundwater migrating from the application area (also known as the Hot Spot area or RemBind™ application area); and 3). Evaluate whether soil treated with the RemBind™ must be excavated. Given that the IRA Plan states that it will take two years for contaminants to travel from the Hot Spot area to the recovery wells, which are located between the Hot Spot area and the Mary Dunn Wells, this should be sufficient time to ensure that actions can be taken before the by-products reach the Mary Dunn wells.

3. If the groundwater is impacted by remedial additives and/or their by-products, you must obtain drinking water samples from the Mary Dunn Wells to evaluate for the presence of the parameters outlined above.

If you have any questions relative to this Notice, please contact Angela Gallagher at the letterhead address or at (508) 946-2790. All future communications regarding this release must reference the following Release Tracking Number: **4-0026179**.

Sincerely,



John Handrahan, Acting Chief
Brownfields, Compliance & Enforcement, and Risk
Reduction Section
Bureau of Waste Site Cleanup

M/JH/AG

ec: Town of Barnstable
Board of Health
Board of Selectmen
Fire Department

Barnstable Department of Public Works, Water Supply Division
Dan Santos, DPW Director, Daniel.Santos@town.barnstable.ma.us
Hans Keijser, Water Superintendent, Hans.Keijser@town.barnstable.ma.us

DEP-SERO

Millie Garcia-Serrano, Regional Director SERO
Gerard Martin, Deputy Regional Director, BWSC SERO
David Johnston, Deputy Regional Director, BWR
Jonathan Hobill, Regional Engineer, BWR
Angela Gallagher, Project Manager, BWSC, Brownfields, C&E, and Risk Reduction Section

DEP-Boston

Paul Locke, Assistant Commissioner, BWSC

Licensed Site Professional

Thomas Cambareri

cc : DEP-SERO
Regional Enforcement Office

