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Peter C. Jurmain, Vice-Chair
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TOWN OF MILLIS

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February 18, 2021

The Honorable Charles D. Baker, Governor
Office of the Governor
Massachusetts State House
Beacon Street #280
Boston, MA 02133

RE: PFAS – Impacts Upon Municipalities

Dear Governor Baker:

We, the Select Board of the Town of Millis, are writing to you as a result of the recent enactment of a DEP regulation dealing with PFAS. Recognizing that this is an unprecedented time of severe financial and emotional stress for all of the residents in the Commonwealth, this new and extremely stringent regulation has further increased these stress levels. As a direct result of these new regulations, which has set the PFAS limits at 20ppt for our potable water (as opposed to the federal limit of 70ppt), we've had to shut down two out of our Town's five wells. Recent tests have indicated that an additional one or two wells may need to be shut down in the near future. These wells are only slightly over the 20ppt legal limit; however we may have no choice but to shut down these wells in order to be in compliance with the new regulation. Of even greater import, in the event additional wells must be shut down, the Town will not be able to meet the water needs of the community with the remaining wells. The consequences of the shutdown would entail trucking in water, finding approved (regularly tested and certified) sources of bottled water and trying to procure temporary filtration facilities which presently have a six month or greater lead time at a cost to the community of over a quarter of a million dollars.

The long-term remedies for mitigating PFAS to meet the new standards pose a significant set of financial and emotional issues for our Town and its residents. Consultations with the Town's professional engineers and hydrogeologists, as they pertain to these concerns, lead us to conclude that the only way to conform to the new regulation is to construct a large filtration system at each affected well site. It is anticipated that the cost of constructing a filtration system for the two wells that have been shut down will be in excess of $3.5 million. This will impose a significant tax/water-rate impact burden on our community whose residents have already suffered severe financial impacts as a result of the COVID pandemic.

We therefore request your assistance in the aforementioned areas of concern. Specifically, we would strongly urge you to defer implementation of this new regulation for at least two more years. During this period of regulation suspension, we request that:

- The Commonwealth provide the communities with a better understanding, in layman's language, of the true, documented and scientifically established risks associated with the consumption of specific levels of PFAS compounds over specific periods of time.
- That the Commonwealth explain in clear language where these compounds come from, how prevalent they are throughout the state, the country, and world, and the scientific research that is still ongoing to determine the long-term effects on human beings at various exposure levels.
- That the Commonwealth offer financially acceptable alternatives to the communities so that they can conform to the new standards in a financially prudent and timely manner.
- That the Commonwealth offer a reasonable time-period for compliance with these new laws and that existing users be reassured that they will not suffer any substantial immediate deleterious effects as a result of consuming water from the public and private water supplies during this interim period.
- That the Commonwealth provide a list of alternative sources of water for those private well owners and towns whose water supply is considered unacceptably compromised by these contaminants, and that the Commonwealth provide financial relief to those individuals and entities during the period that they are implementing remedial measures that are approved by the Commonwealth.
- That information be provided that allays any fears of the potential for immediate consequences of using public and private water supplies while new remediation facilities are being constructed.
- That financially acceptable testing alternatives have been established for both private wells and public water supplies that will reassure users that the water that they are consuming meets reasonable standards as presently understood by the scientific and testing community, and that these standards will be revised as new, scientifically corroborated data become available.

We have attached some additional information regarding the specific measurements, issues and alternatives with which the Town of Millis is actively working to try to meet the new DEP standards as demanded by the recent law.

We recognize that these laws are intended to protect our residents to the greatest degree possible. However, it has also become clear from the analytical data provided to us by the DEP and the Federal Government that these chemicals are prevalent in water supplies throughout most of the Commonwealth and that we have been consuming these byproducts of manufacturing and technology for decades. As such, there is no need for an immediate cessation of consumption in most cases, and that there are almost no baselines that have been established in any community throughout the Commonwealth that would help us to better understand both the source for further mitigation purposes, and the impact of these chemicals on consumers over some extended period of time. The impact of these regulatory changes will most certainly extend far beyond the

Town of Millis. We expect scores of communities in Massachusetts will soon be in the same predicament that we find ourselves. It will surely require the active participation of your administration to address the many concerns connected to this matter.

In order to discuss these issues and concerns in more depth we respectfully request a meeting with you and/or the Lieutenant Governor, as well as the members of our State Legislative Delegation in the sincere hopes that these matters of vital interest are properly addressed .

Thank you very much for your consideration in this important matter.

Respectfully,

James J. McCaffrey, Chair

Peter C. Jurmain, Vice-Chair

Erin Underhill, Clerk

cc: The Honorable Karyn Polito, Lt. Governor
Senator Becca Rausch
Representative David Linsky
Representative Shawn Dooley

Attachment

In order to provide a little better context to the situation in the Town of Millis we've provided the following summary of the issues and our related concerns:

1. **Summary of Impacts to Millis Water Supply from PFAS (per- and polyfluoroalkyl substances)**

The Town of Millis water supply is facing a growing crisis with its water supply relating to PFAS:

- Two of the Town's six wells (Wells 1 and 2) have been taken offline for exceeding the new MassDEP drinking water regulation (maximum contaminant limit or MCL) of 20 nanograms per liter (ng/L) for PFAS6.
- Wells 3 and 5 are above 10 ng/L and require monthly sampling. The sampling alone costs the Town approximately $2,400 per month.
- Wells 4 and 6 are currently below 10 ng/L but only slightly (approximately 8 ng/L).
- All six of the Town's wells show increasing concentrations of PFAS6.

The Town's officials and residents are increasingly concerned about the water system and potential impacts to their health. Millis is not alone. More than two dozen water systems in the Commonwealth have also been impacted and the number is growing. Many systems have had to install temporary and permanent treatment facilities costing millions of dollars. Millis is facing a similar expense, compounded as it is likely needed at multiple locations in a very short period of time. The sources of the PFAS at each of these locations is unknown, and likely disparate. Some of the impacted wells (e.g. Wells 1 and 2) are near past industrial sites where use of PFAS chemicals have either been documented or implicated. However, Wells 5 and 6 are in a wooded location and adjacent to the Charles River without obvious high risk land use watershed. Millis lacks the resources to investigate the origins of the contamination. We feel that MassDEP should be doing much more to determine sources and ambient groundwater concentrations of PFAS so that the true impacts of PFAS on the environment and both private and public wells can be better understood and addressed. In addition, much more funding is needed, and quickly, to support communities facing expensive treatment costs.

2. Background

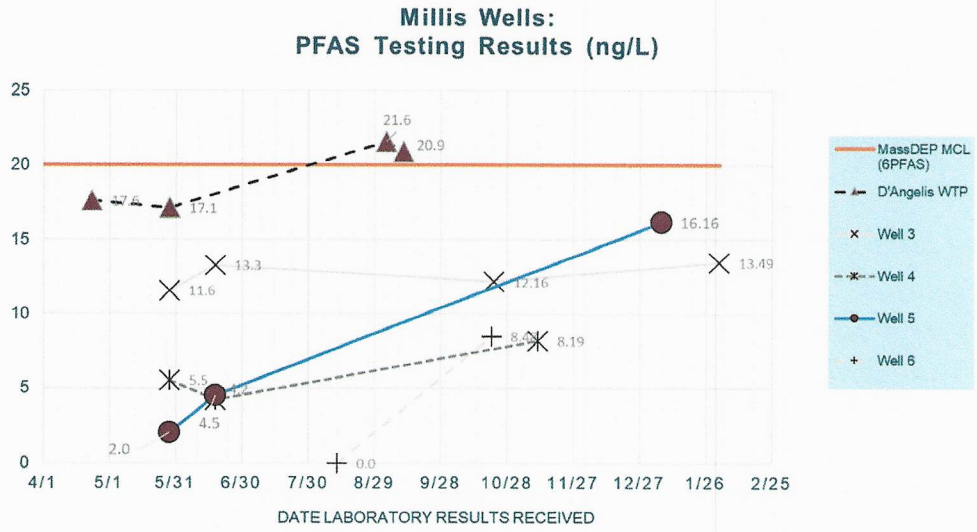
PFAS (per- and polyfluoroalkyl substances) are a group of numerous human-made chemicals used since the 1950s to manufacture stain-resistant, water-resistant, and non-stick products, and used in some fire-fighting foams. Because these chemicals have been used in many consumer products, most people have been exposed to them. PFAS have been detected in groundwater, wastewater, and even in rainfall. PFAS stay in the environment for a long time and do not break down easily. As a result, PFAS may be widely detected in soil, water, air, and food.

The Town of Millis has been closely tracking the issue of PFAS since early 2019, and in the spring of 2020, the Town decided to take the proactive measure of beginning to voluntarily test its water supply wells in advance of any promulgated regulation. In September 2020, Millis discovered levels of PFAS in its Well 1 and Well 2, which feed the D'Angelis Water Treatment

Plant (WTP) which were above the MassDEP proposed limit of 20 nanograms per liter (ng/L) for PFAS6. Although this was not a violation at the time, Millis took immediate precautionary action to shut down the WTP and reached out to coordinate with MassDEP.

Millis also retained the services of Kleinfelder, its consulting engineer, to evaluate the data, to assist the Town with developing educational materials to keep the public informed, and to advise on next steps regarding treatment. Meanwhile, Millis continued coordinating with MassDEP and testing its public supply wells. In October of 2020, the 20 ng/L MCL was published, making this level enforceable, along with many new monitoring and public notification requirements. As Figure 1 below shows, the testing results have continued to worsen, and in January, Millis voluntarily took Well 5 offline as a precaution when test results of 16 ng/L were received. Well 6 is only a short distance from Well 5 and Millis fears that it may similarly be impacted in the near future. If Millis must shut down both Wells 5 and 6 in addition to Wells 1 and 2, its ability to meet daily water demands will be in jeopardy.

ebFigure 1: Town of Millis Supply Well PFAS (ng/L); Results through 2/1/21



3. Treatment Solutions and Costs

Millis needs to act quickly to implement major upgrades to install treatment at its wells. Kleinfelder developed a preliminary order-of-magnitude budgetary estimate for adding granular activated carbon (GAC) filters to the D'Angelis WTP, which was estimated at approximately $3.5M. It's important to note, this estimate was based upon an accelerated but non-emergency timeline of approximately one year (combined) for design and construction. In light of the rece

Well 5 results, and the rising trends at other wells, it is quite possible that Millis could be faced with an emergency situation.

Implementing emergency treatment could require either a temporary treatment solution and/or an accelerated design-build process for a more permanent facility. An accelerated design-build facility would be more costly for a number of reasons. For example, components (such as concrete building slab) must be overdesigned to mitigate uncertainty in existing site conditions, and treatment components may need to be winterized in temporary shelters to be later converted

to permanent structures. In addition, emergency procurement of treatment filters is likely to be more costly.

Kleinfelder has also researched preliminary pricing for temporary and mobile treatment units. These are also very costly for municipal scale drinking water; significant initial costs are involved (on the order of $200,000) and monthly costs of over $10,000.

During July 2020, Millis and Kleinfelder submitted a PFAS Grant Application to MassDEP, but were not among the awardees. This would have provided up to $200,000 to defray design costs. When a second funding round was announced, the Town re-applied in November and is awaiting the decision.