

Duxbury Selectboard PFAS Policy Directive

In accordance with the Duxbury Selectboard's authority to adopt policy directives and guidelines to be implemented by officers, boards, committees, commissions, and employees of the Town, the Selectboard adopts the following policy directive related to per-and polyfluoroalkyl substances (PFAS):

*****Comments from Environmental Partners are in *red* text below. Comments from Weston & Sampson are in *blue* text below.**

Town of Duxbury Drinking Water PFAS Response Action Plan

The Town of Duxbury (the "Town") shall develop a PFAS Response Action Plan. The objective of the PFAS Response Action Plan (the "Objective") is to eliminate public exposure to PFAS chemicals by reducing PFAS concentrations to the extent possible in drinking water, thereby reducing potential serious PFAS-attributable illnesses in Duxbury residents. The Town of Duxbury shall implement a whole-of-government approach to achieve this Objective.

The Selectboard hereby appoints the Duxbury Water Superintendent as the "PFAS Project Manager" and to delegate Town staff to develop and implement a town-wide Drinking Water PFAS Response Action Plan and to seek funding for necessary infrastructure. The Duxbury Water Superintendent shall work with the advice of the Board of Health, the Water and Sewer Advisory Board, the Department of Public Works Superintendent, the Finance Committee, and any other Town administrators and/or entities as appropriate and shall report back monthly to each of these identified boards, committees, administrators, and entities, as well as to the Selectboard, on progress to achieve the Objective.

Associated actions to achieve the Objective include:

- 1) Ensuring that all twelve (12) town wells are tested for PFAS on a quarterly basis in accord with established testing protocol, and that test results are provided to the Selectboard and to each of the above-identified boards, committees, administrators, and entities; and

PFAS sampling is being performed at least 8 wells.

The sampling and testing protocol meets the requirements for PFAS sampling and testing set by the EPA and by MassDEP. The Town is required by the State and EPA to test at this frequency already.

- 2) The Water and Sewer Advisory Board will engage a qualified consultant who shall, within six (6) months of the date of this policy directive:

Environmental Partners presented a Water Supply Master Plan study on June 22, 2022.

Environmental Partners was engaged to perform a Water System Master Plan with a focus on water quality challenges and treatment for the entire water system. The Plan was completed in early 2022, prior to the EPA proposes a much lower PFAS

concentration.

a) evaluate the Duxbury public water system in terms of water quality, hydraulics, and overall condition of existing facilities;

The Environmental Partners Water System Master Plan includes analyses for water quality, hydraulics, and existing facilities.

b) prepare planning treatment system designs and planning level cost estimates of anticipated capital improvements, including treatment infrastructure and treatment operation and maintenance costs over the next five (5) years; and

The Environmental Partners Master Plan outlined capital projects on a 20-year basis in five year increments with costs to complete each phase. They identified during the Plan process Partridge was an immediate need given its current non-compliance with the current PFAS MCL. The Town and Environmental Partners proactively identified the treatability of the source and applied for ARPA funding. Wright Pierce has been selected to design Partridge and kick off meetings have occurred as well.

As part of the Select Board meeting on May 22, 2023, EP has also prepared an additional sample treatment project schedule that lists potential PFAS treatment projects for the Town's other water sources ordered by priority. This list will be discussed at the June 12, 2023 meeting.

Wright Pierce was recently selected by the Town for Partridge Street PFAS treatment design. Refer to the Environmental Partners Master Plan study for additional treatment planning and costs.

c) update Duxbury's existing hydraulic model, if required, and evaluate system performance in terms of meeting existing and future demands and water quality requirements through treatment or source management; and

Environmental Partners performed a hydraulic model update as part of the Water System Master Plan.

- 3) A Request for Quote ("RFQ") will be developed for construction of the designed system(s) and distributed to qualified contractors; and

The Town selected Wright Pierce as the design engineer to perform this work.

The Town plans to work with Environmental Partners to begin the Depot & Tremont Wells project which will bring a supply back online and provide iron and manganese removal in addition to PFAS treatment.

- 4) The Town, in consultation with the Water and Sewer Advisory Board, will proactively identify potential sources of funding and fully staff Town departments to achieve the Objective. The Massachusetts Department of Environmental Protection State Revolving Fund ("SRF") and Asset Management Grant programs should be considered as potential funding sources. (Applications for these programs are due August 2023.) The Water and Sewer Advisory Board will engage a consultant to prepare a dynamic Water Rate Model.

This model will be used for water rate forecasting as a means for future capital plan implementation.

Typically it makes more sense to have the design engineer prepare the application for funding.

The design consultants typically submit the grant and funding applications on behalf of the Town. Environmental Partners assisted the Town and Finance Director with procuring and obtaining the ARPA funds for the Partridge Well treatment project and will begin filing the PEF to SRF for the Depot/Tremont project. The Town should hire a consultant to perform a water rate analysis to identify how to incorporate the entirety of the treatment program into debt service and the water/sewer rates.

Time is of the essence to complete and implement this Drinking Water PFAS Response Action Plan to protect the public health; newly proposed federal PFAS drinking water standards will likely result in significant cost increases due to high demand for PFAS treatment systems.