

DUXBURY SAFE WATER COMMITTEE, INC.
21 TINKERS LEDGE ROAD
DUXBURY, MA 02332

May 10, 2023

VIA ELECTRONIC MAIL: Mayo@duxbury-ma.gov

Tracy L. Mayo, Health Agent
Dr. David Brumley, Chair
Town of Duxbury Board of Health
Duxbury Town Offices
878 Tremont Street
Duxbury, MA 02332-4499

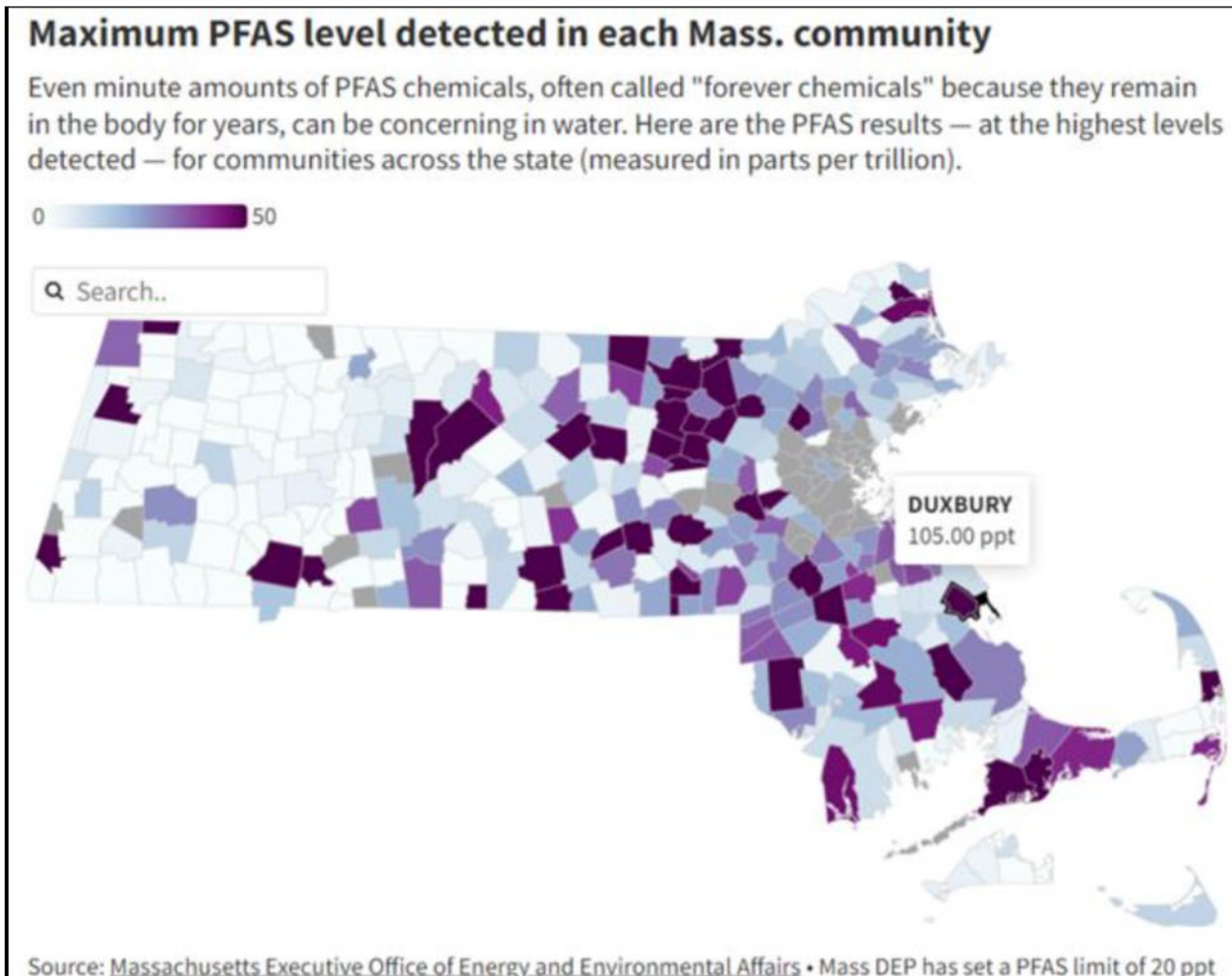
Re: Request for Inclusion on Agenda at the Board of Health's May 18, 2023 Public Meeting

Dear Ms. Mayo, Dr. Tepper, and Members of the Board of Health:

Thank you for including Duxbury Safe Water Committee, Inc. (the "Committee") as a standing item on the agendas of the Town of Duxbury Board of Health (the "Board"). We plan to attend (virtually or in person) the Board's next public meeting, scheduled for May 18, 2023, to request that the Board order the Town to comply with the proposed Town of Duxbury Drinking Water PFAS Response Action Plan, which is enclosed herewith for your consideration. In anticipation of the Board's May 18th meeting, this letter serves to outline our concerns pertaining to the safety of the Town's public water supply and the importance of addressing the PFAS contamination issue as expeditiously as possible.

1. PFAS IN DUXBURY PUBLIC DRINKING WATER

Currently, all twelve (12) of the Town's drinking water wells contain PFAS. This is not a problem exclusive to Duxbury but is a state-wide and national issue. The graphic below demonstrates how Duxbury compares with other municipalities in Massachusetts. An expeditious and proactive response to this problem is critical, as more and more municipalities and private residences are installing PFAS filtration systems. As we have seen during the pandemic, with a significant increase in need, production and supply chain issues likely will result in PFAS filtration systems being in short supply and increasing in cost. For example, Barnstable recently installed a PFAS filtration facility to service the Cape Cod public water supply. According to Duxbury Public Works Director Peter Buttkus, the project was first estimated to cost \$12 Million. When completed in 2020, the total cost was approximately \$20 Million. as more and more municipalities learn of—and begin to address—this health issue.



2. CURRENT DRINKING WATER REGULATIONS IN MA: 310 CMR 22.0, et seq.

Since 2020, Massachusetts regulations have established enforceable standards for public drinking water systems impacted by PFAS and require regular testing for the contaminants. *See* 310 CMR 22.00, *et seq.* Specifically, the new drinking water standard for PFAS establishes a limit of 20 parts per trillion (ppt). The Massachusetts standard provides a higher degree of protection, particularly for sensitive subgroups including pregnant women, nursing mothers and infants, as PFAS are now known to cause serious health issues, including cancer.

3. PROPOSED FEDERAL DRINKING WATER REGULATIONS

On March 14th, 2023, the U.S. Environmental Protection Agency (the “EPA”) proposed the first-ever national drinking water standard for six PFAS compounds: PFOA, PFOS, PFNA, PFHxS, PFBS and GenX. The proposed standard would set the limit for PFAS at 4 ppt each and require monitoring for any mixture of the other four compounds using a hazard index calculation to determine if they pose a potential risk. However, the EPA has stated that there are “no safe levels of PFAS.” The passage of the EPA regulations is imminent; and, if passed, all of Duxbury’s town wells will be non-compliant.

4. PROPOSED DRINKING WATER PFAS RESPONSE ACTION PLAN

The Committee respectfully requests that this Board exercise its statutory authority pursuant to G.L. c. 111, § 122,¹ which mandates that the Board protect the health, safety, and welfare of the public and order the Town to comply with the enclosed Drinking Water PFAS Response Action Plan (the “Plan”). The Duxbury Water and Sewer Advisory Board, with the assistance of two water quality experts, drafted the Plan and presented it to the Selectboard for its approval at the Selectboard’s meeting on May 8, 2023. Unfortunately, the Selectboard has declined to act on it at this time. Accordingly, the Committee is seeking an order from the Board of Health 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. By taking this action, the Board of Health will ensure that the Town takes action to address PFAS contamination now—which is in the best interest of the public health and safety.

¹ G.L. c. 111, § 122, mandates the Board to examine any source of filth/cause of sickness & take action to take action to protect health, safety & welfare of public and states expressly as follows:

The board of health shall examine into all nuisances, sources of filth and causes of sickness within its town, or on board of vessels within the harbor of such town, which may, in its opinion, be injurious to the public health, shall destroy, remove or prevent the same as the case may require, and shall make regulations for the public health and safety relative thereto...

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On behalf of the Duxbury Safe Water Committee and the affected residents of Duxbury, we thank you for your time and prompt attention to this matter and look forward to meeting with you on May 18th. Should you have any questions in the interim, please do not hesitate to contact me directly.

Respectfully,



Tanya D. Trevisan
Co-Founder, President, Duxbury Safe Water Committee, Inc.
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Encl.

cc: Duxbury Safe Water Committee, Inc. (via email)
Duxbury Town Manager Rene Read (via email)
Duxbury Water Department Superintendent Peter Mackin (via email)
Duxbury Public Works Department Director Peter Butkus (via email)
Duxbury Building Commissioner/Director of Municipal Services James Wasielewski (via email)