



PUBLIC INVOLVEMENT PLAN – RESPONSE TO PUBLIC COMMENTS  
Barnstable County Fire Training Academy Site  
155 South Flint Rock Road  
Hyannis, Massachusetts  
DEP Release Tracking No. 4-26179

Prepared For:

Barnstable County  
3195 Main Street  
Barnstable, Massachusetts

Submitted To:

Massachusetts Department of Environmental Protection  
Bureau of Waste Site Cleanup  
Southeast Regional Office  
20 Riverside Drive  
Lakeville, MA 02347

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## 1.0 INTRODUCTION: RESPONSE TO PUBLIC COMMENTS

Nover-Armstrong, a Division of BETA Group Inc. (BETA) prepared a finalized Public Involvement Plan (Plan) that was filed with MassDEP on June 27, 2019 on behalf of Barnstable County, the current owner of the Barnstable County Fire-Rescue Training Academy (the Facility or FTA) located at 155 South Flint Rock Road, Hyannis, Massachusetts. The Facility has been designated a Disposal Site as defined by the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000. The Massachusetts Department of Environmental Protection (MassDEP) Bureau of Waste Site Cleanup (BWSC) has assigned Release Tracking Number (RTN) 4-26179 to the historic release of per- and polyfluoroalkyl substances (PFAS), including perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA), which have been identified at the FTA. PFAS have been identified in soil and groundwater at the Facility and in adjacent areas, including groundwater to the east, southeast of the Facility and in adjacent surface waters and sediment.

In January 2019, a petition from a group of residents of Barnstable and Hyannis, MA was received requesting that the Site be designated a Public Involvement Plan (PIP) Site. In response to the request from the local petitioners, Barnstable County designated the Site as a PIP site and has begun PIP activities in accordance with 310 CMR 40.01404. Notification of the Site Designation and the initial public meeting was provided to all petitioners and the Town of Barnstable officials in writing in February 2019. On May 2, 2019, a public meeting was held and a Draft Public Involvement Plan (PIP) was presented and distributed. In preparation of the Draft Plan, BETA has conducted interviews with several petitioners interested in the Site, with town officials, and with other local organizations. At the May 2, 2019 meeting, several attendees provided comments and questions.

Additionally, comments were received by the County on the Draft Plan for a minimum of 20 days after the distribution of this Draft Plan per 310 CMR 40.1405(5)(b). Public comments (as they relate to the response actions implemented for the release of PFAS at the Site and are in accordance with 310 CMR 40.01404) have been incorporated into the final Plan, as appropriate and feasible. All comments/questions received during the PIP development process, the PIP Meeting on May 2, 2019, and during PIP public comment period are included in the Final PIP document and herein.

Per 310 CMR 40.1405(g) of the Massachusetts Contingency Plan, written responses to the comments have been prepared and are presented in this Public Involvement Plan – Response To Comments document. Some written responses to the comments were included in the final PIP document, but all comments and the written responses to these comments are presented herein. A copy of this document will be placed in the public repositories for the project (as stated in the final PIP document).

The completed BWSC106 Miscellaneous Document Transmittal Form is being submitted to the MassDEP electronically via the eDEP system. This Public Involvement Plan - Response to Public Comments document is being submitted to the Massachusetts Department of Environmental Protection (MassDEP) as an attachment to that form. A copy of the form prior to electronic signature is included as Appendix A.

A notice of availability of this Response to Public Comments summary will be mailed to the Site public involvement mailing list and a notice will be sent via email to the email portion of the mailing list.

## 2.0 RESPONSE TO COMMENTS RECEIVED DURING PIP DEVELOPMENT PROCESS

As noted during the Draft PIP development process, Barnstable County and BETA was to prepare a summary of all comments relevant to the Draft PIP. A summary of major comments and concerns expressed during the development of the Draft PIP and the preliminary responses to them are presented below.

### 2.1 General Environmental Concerns Received Prior To May 2, 2019

1. Protect the groundwater supply.
2. Stop use of water at FTA.
3. Evaluate pond water & sediment.
4. Close the FTA.
5. Clean up the Site as fast as possible.
6. Do not cause unnecessary public concerns.

Summary responses are presented below and are organized by the numbered points.

1. Groundwater immediately downgradient of the Site is pumped and treated for PFAS via granulated activated carbon; system performance results are presented monthly in Immediate Response Action (IRA) Status and Remedial Monitoring Report (RMR) reports. Effluent concentrations are below the applicable MassDEP ORS Guidelines as well as the newly draft MCP GW-1 standards. In addition, the water pumped by the Mary Dunn wells is effectively treated by granular activated carbon adsorption prior to its distribution to the municipal water system.

As part of MCP response actions going forward, alternatives and technologies to remediate PFAS impacted soil, and further remediate the groundwater at and downgradient of at the FTA will be evaluated and selected for implementation.

2. As of June 17, 2019, Barnstable County has halted water use for active fire suppression training at the FTA.
3. Additional assessment of Flintrock Pond is ongoing as required for the Special Order of Conditions and MCP response actions. Recent assessment data has been presented in previous IRA Status reports and will also be incorporated into the Phase II CSA process and report, which is to be submitted in 2020.
4. Barnstable County is evaluating alternatives for relocation of the Academy.
5. Response actions related to the clean-up of PFAS in the groundwater are being conducted as fast as feasibly possible. PFAS are complex, emerging, persistent compounds and much remains to be learned about their fate, transport, and behavior in the environment. This makes current and potential future clean-up actions complex, costly and arduous. In addition, Barnstable County has limited funding resources and capacity and must operate within its charter.
6. Barnstable County is attempting to provide transparency during MCP response actions at the Site as they relate to the clean-up of PFAS in the soil and groundwater.

In addition to the general concerns noted above, on March 20, 2019, a letter from the GHCA was received by the Barnstable County Commissioners regarding environmental concerns at the BFTA and moving the Academy from its location as a result of its proximity to the Mary Dunn public drinking water wells. A copy of this letter is included in Appendix B.

In response to this letter, the County stopped all wet training activities as of June 17, 2019.

Environmental response actions have been ongoing since the discovery of the release in 2015; a groundwater pump and treatment system has been operating downgradient of the Site since July 2016. The granular activated carbon (GAC) treatment of the Mary Dunn wells is actively preventing a potential Imminent Hazard to the Hyannis community by removing the PFAS compounds from the water supply. A Settlement Agreement is in place between the Town of Barnstable and Barnstable County that requires the County to fund a portion of the costs associated with operating the Mary Dunn wells treatment systems.

## 2.2 Public Involvement Concerns received prior to May 2, 2019

1. Provide more links to County webpage set up for the FTA Site.
2. Establish additional repositories.
3. Provide periodic updates and meetings.
4. Consider language translations.
5. Improve the County webpage.

Summary responses are presented below, organized by the numbered points.

1. Barnstable County is continuing to update their website and the public repository to include all relevant information on the Site as it relates to the cleanup of PFAS.
2. Barnstable County will continue to maintain their website and the repository at the Hyannis Public Library; additional repositories are not feasible or judged to be effective at this time. Other villages of the Town of Barnstable draw groundwater from areas unaffected by the FTA.
3. Periodic updates will be provided to those on the mailing list and public meetings will occur at milestones and approximately quarterly.
4. Unfortunately, it is not economically feasible to provide additional language translations to all public involvement documents. The feasibility of providing translations of general written updates will be evaluated.
5. Barnstable County continues to update their website.

## 3.0 RESPONSE TO COMMENTS AND QUESTIONS RECEIVED AT PIP PUBLIC MEETING – MAY 2, 2019

The following comments/questions were made on May 2, 2019 by the attendees of the PIP Meeting held at Barnstable Town Hall and responses to the questions/comments raised are provided herein. To note, the comments and/or questions (from the May 2, 2019 meeting) were not recorded as formal dictation. Notes were taken and paraphrases of the proceedings are presented below.

Apologies are made for any incorrect spelling of names. A copy of the complete meeting minutes was included in Appendix C of the Final Public Involvement Plan.

Select comments have been addressed via attempts to incorporate them into the final PIP, as they were deemed economically feasible by Barnstable County and relevant to the release of PFAS to the soil and groundwater at the FTA Site.

1. Member in audience requested that the PowerPoint Presentation be posted to the County's website

RESPONSE: The PIP meeting presentation can be accessed at the County's website (link to website is provided below)

<https://eeaonline.eea.state.ma.us/portal#!/wastesite/4-0026179>.

2. Cheryl Osmo, Silent Spring Institute Founder; Breast Cancer Association

- a. Asked that the County cease all water exercises at the Academy

RESPONSE: Barnstable County ceased all water training activities at the Academy as of June 17, 2019.

- b. Requests that the groundwater impacts/plume are further defined and further investigated

RESPONSE: As part of 310 CMR 40.0830, Phase II Comprehensive Site Assessment activities are ongoing, all Phase II CSA results/data will be presented in the Phase II CSA report submittal due to MassDEP by May 2020. However, the draft Phase II CSA will be presented for public comment before the May 2020 due date.

- c. Requests that the groundwater impacts are contained and/or cleanup ASAP

RESPONSE: Cleanup/response actions have been implemented since the discovery of the release in 2015 and are currently ongoing. A groundwater pump and treatment system has been in operation since July 2015; the system pumps impacted groundwater from downgradient of the Academy and effectively treats/removes PFAS from the groundwater via carbon adsorption technology. PFAS concentrations documented in the effluent of the treatment system have been below both the current MassDEP ORS Guideline of 70 parts per trillion (ppt) and the draft proposed MassDEP Method 1 Groundwater (GW-1) Standard of 20 ppt. The data are presented in the Monthly Immediate Response Action (IRA) Status Reports and Remedial Monitoring Reports (RMR) that are submitted to MassDEP. All response actions are diligently implemented but are significantly affected by budgetary/financial restraints, the complex nature of PFAS, and the limited knowledge of PFAS interaction within the environment.

3. Bill Doherty, Former County of Barnstable Commissioner

- a. Requests that the Commissioners invite the residents to the Site

RESPONSE: The public may request an escorted and/or guided tour of the facility.

- b. Make available progress letter, reports/site plans so public doesn't have to wait for a "milestone" report.

RESPONSE: Monthly IRA Status Reports and RMR are submitted to MassDEP as a combined single document.

These are available on MassDEP's Site Database shortly after filing accessible under the "Supporting Documents" tab of the database page for the FTA Site: RTN 4-26179.

Below is the link to the MassDEP Document Database for the BFTA.

<https://www.barnstablecounty.org/bcfta-history/>

Many of these reports are also available on the County's website and they will be added as they are submitted to MassDEP. The Town of Barnstable Manager, Board of Health, and Water Supply Division receive public notification letters after the submittal of each monthly IRA Status and RMR report as required by 310 CMR 40.1400. These letters provide brief summaries of the monthly status/interim reports and direction on how to obtain copies of the reports.

Per the final PIP, email notifications of each monthly status report will be issued to everyone on the Public Involvement Plan mailing list who provided an email address.

- c. States that the County needs more ways to communicate/update the public.

RESPONSE: As previously mentioned, the County website and the MassDEP Searchable Sites document database contain electronic copies of all monthly status reports. These letters provide brief summaries of the monthly status/interim reports and direction on how to obtain copies of the reports. Per the final PIP, email notifications of each monthly status report will be issued to everyone on the Public Involvement Plan mailing list who provided an email address. Copies of major milestone reports will also be kept at the Hyannis Public Library repository. Public notices for meetings will be published in the local newspapers.

The County has determined that additional major means of communication is not budgetarily feasible at this time. However, general updates on the progress of assessment and cleanup of the FTA Site will be distributed periodically via email and the County website.

4. Maureen Geronmount; Resident of Hyannis District 8

- a. Requests that the Academy stop wet training and start remediation immediately

RESPONSE: Barnstable County ceased all water training activities at the Academy as of June 17, 2019.

- b. Have recent rainfall amounts impacted the water quality?

RESPONSE: It is speculated that increased rainfall and stormwater infiltration may exacerbate subsurface PFAS plumes, as PFAS compounds released into the subsurface may bind/adsorb to soil and/or sediment particles, and then leach into groundwater below. PFAS compounds have been documented to also display hydrophilic characteristics (i.e. mix well with water and are readily mobile in water/aqueous environment). Therefore, it is assumed that PFAS are readily transported into the groundwater from soil via rainfall or stormwater infiltration.

- c. Should we be going after the chemical companies who manufactured PFAS?

RESPONSE: The County has been diligently and tirelessly attempting to file suit or find legislative avenues to put the financial responsibility of the clean up on companies like Dupont and 3M who have been linked to the manufacture of PFAS in fire-fighting foam products.

5. Pat Princie, Hyannis Representative

- a. Requests a clear blueprint for cleanup going forward.

RESPONSE: The final Public Involvement Plan (PIP) outlines the cleanup plan for the Site based on MassDEP regulations. All major milestones (that are noted in the PIP) will be subject to public comment.

6. Sue Phelan, Lead Petitioner

- a. What does it mean to drink water with PFAS for years without treatment?

RESPONSE: Scientists and toxicologists are diligently conducting research on PFAS that is evolving and published frequently. The County and its LSP will continue to study this emerging research. The County's primary goal is to clean up the PFAS release at the BFTA and provide safe drinking water to the citizens of Hyannis.

- b. Have outer limits of contamination been delineated?

RESPONSE: Several extensive rounds of PFAS groundwater data have been collected and presented since the discovery of the release in 2015. A groundwater monitoring program was approved by DEP in January 2019; the program includes sampling and analysis of selected (groundwater) monitoring wells to assess the groundwater plume. Monitoring on selected wells is conducted quarterly; a larger set of wells installed across the Site are sampled annually. These monitoring wells were selected based on current and historic PFAS concentrations. A copy of the program can be found on MassDEP's document database. Further assessment of the soil, groundwater, and Flintrock Pond is ongoing per the Phase II Comprehensive Site Assessment (Phase II CSA). These findings will be presented in a drafted Phase II CSA that will be subject to public comment. The Phase II CSA is due to MassDEP by May 2020.

- c. Requests that ATSDR and MassDEP provide regular progress reports on PFAS

RESPONSE: Under the procedures of the Massachusetts Contingency Plan (the MCP), MassDEP typically does not provide regular status reports. Inquiries about such reports must be addressed to and answered by MassDEP and/or ATSDR, as their actions are outside of the control of Barnstable County.

As noted previously, Barnstable County and its consultant prepare monthly IRA Status Reports and RMRs that are submitted to MassDEP as a combined single document. These are available on MassDEP's Site Database shortly after filing accessible under the "Supporting Documents" tab of the database page for the FTA Site: RTN 4-26179.

Below is the link to the MassDEP Document Database for the BFTA.



<https://www.barnstablecounty.org/bcfta-history/>

Many of these reports are also available on the County's website and they will be added as they are submitted to MassDEP.

- d. Requests that all reports be uploaded/accessible to public within 24 hours of MassDEP submittal

RESPONSE: The County is working diligently to implement the finalized PIP activities, specifically PIP communication activities such as maintaining all repositories within 24-48 hours of a report submittal. At this time the County can not commit to uploading reports within 24 hours. However, an electronic notification system (email) is being developed and going forward all persons on the PIP mailing list will receive email notification of report submittals, changes to PIP activities and/or PIP meetings, etc., within a short time of such actions or submittals to MassDEP.

- e. Requests that a PIP committee be established to review all reports and submittals

RESPONSE: MassDEP regulations for public involvement activities (the Massachusetts Contingency Plan at 310 CMR 40.1405) do not address a PIP committee or citizens committee. More importantly, a separate citizens committee seems redundant to the public involvement process.

The public involvement process is designed to create a forum for the public (that are affected by the release at a Site) to advise, review plans and reports, and/or make suggestions to the County and it's LSP on matters regarding the releases and cleanup at the Site (BFTA). The primary participants in the forum, specifically the petitioners, local officials, and the active participants on the living PIP mailing list, are assumed to act somewhat like an advisory committee. A brief response to this request was included in the final PIP stating that the creation of a separate PIP committee is not feasible for the County nor is it required by MassDEP.

If the citizens interested in the Site (which could include the original petitioners, local officials, town organizations, and other public residents) would like to create their own committee and to participate in the public involvement process through that committee that is certainly their choice.

- f. Asked: what other PFAS compounds are present and what are their health effects?

RESPONSE: Scientists and toxicologists are diligently conducting research on PFAS that is evolving and published daily. The County and it's LSP will continue to study this emerging research. The County's primary goal is to clean up the PFAS release at the BFTA and provide safe drinking water to the citizens of Hyannis. The County has found that the Interstate Technology & Regulatory Council (ITRC) and The Silent Spring Institute are great resources in further understanding the complex nature of PFAS compounds. The links to the ITRC PFAS page and Silent Spring's research are provided below.

ITRC - <https://www.itrcweb.org/team/public?teamid=78>

Silent Spring - <https://silentspring.org/our-science>

- g. Requests a webpage on Town website as well

RESPONSE: The County has a webpage dedicated to the history and release of the Site as well as information on all PIP activities. There is no webpage on the Town of Barnstable website currently. However, town officials have indicated that they will create a link on their website to the County's webpage for the FTA Site.

7. Tom Cambareri, Hyannis resident and former LSP-of-Record for the BCRTA

- a. States the number of meetings is too infrequent

RESPONSE: As stated in Section 4.5 of the final PIP document, the County will hold PIP meetings for public comment at every major milestone (during the MCP assessment process) including but not limited to: major IRA Plan Modification(s), the Phase II CSA, Phase III Remedial Action Plan (RAP), and the Phase IV Remedial Implementation Plan (RIP). Additionally, public meetings will be held on an approximate quarterly schedule to provide general updates. Additional meetings beyond this is not feasible for the County currently.

- b. Believes that the Phase II CSA SOW is inadequate and needs to be reviewed as part of the PIP process

RESPONSE: As previously stated, the Phase II CSA will be subject to public comment. The Phase II CSA is a required MCP submittal per the Site Assessment process and is due to MassDEP by May 2020. The County will hold a public meeting in advance of this submittal date to present the Phase II CSA for public comment. The County and its LSP are in communication with MassDEP, the Town of Barnstable and the Barnstable Conservation Commission to ensure the appropriate assessment of the PFAS release is conducted.

- c. States that it is time to complete assessment and to proceed with the cleanup of the FTA.

RESPONSE: The County is proceeding with MCP response actions in general accordance with the MCP within its limited resources. In response to directives from MassDEP, IRA Plan Modifications are in process to address major conditions at the Site.

8. Zenus Crocker

- a. Would like to know where the plume is going and/or located currently?

RESPONSE: As stated in the PIP, from 2015 to 2018, the Cape Cod Commission previously identified a plume of the highest concentrations approximately 200 feet wide at the Site and migrating from the Site in the easterly direction towards Mary Dunn Road. BETA has continued to conduct assessment activities at the Site since April 2018. The Phase II CSA SOW proposes additional response actions such as continued assessment of all PFAS impacted media at the Site (soil, groundwater, sediment, surface water), monitoring of the Site groundwater conditions.

b. What needs to be done to treat and clean up the site?

RESPONSE: Currently, Barnstable County operates and maintains a groundwater pump and treat system to help remediate and contain the PFAS apparently migrating from the FTA facility. The groundwater pumping and treatment system (GWP&TS) was re-started using GAC for treatment in July 2015. Between December 2016 and March 2019 Barnstable County has submitted 28 IRA Status and RMRs to MassDEP for the PFAS release. The RMRs address the County's groundwater pump and treat system (GWP&T), which recovers and treats approximately 50,000 gallons per day (gpd) of groundwater from the downgradient well, PRW-4. The system is working to reduce PFAS concentrations in the aquifer before they reach the Mary Dunn wells treatment systems.

The GAC treatment of the Mary Dunn wells is actively preventing a potential Imminent Hazard to the Hyannis community by removing the PFAS compounds from the water supply. A Settlement Agreement is in place between the Town of Barnstable and Barnstable County that requires the County to fund a portion of the costs associated with operating the Mary Dunn wells treatment systems.

Additional assessment at the Site will be conducted as part of the Phase II Comprehensive Site Assessment, to be submitted by May 2020. The Phase II CSA aims to gain a better understanding of the PFAS contamination at the Site to implement the most effective response/cleanup actions. The Phase II CSA will be drafted and presented for public comment prior to May 2020. Following the Phase II CSA, comprehensive clean up alternatives and technologies will be developed, evaluated and selected to implement a final clean-up plan for the Site.

While that process is going forward, MassDEP has directed the County to prepare detailed IRA Plan modifications for the capping PFAS-impacted soils at the Site, and to increase the pumping and treatment of PFAS-impacted groundwater at the Site. These plans are in preparation at this time and will be submitted to MassDEP as a public comment draft report in late August 2019.

9. Steve Seymour, Petitioner

a. Mr. Seymour stated that he was not contacted during the petitioner interview process.

RESPONSE: The County apologizes for any miscommunication, attempts were made to contact all petitioners prior to the May 2, 2019 meeting unless written comments were received from them. An error in the interpretation of a petitioner's address or phone number could have been made. The County has created a living PIP mailing list since the May 2, 2019 meeting and will contact all persons on the list via email or a written mailed letter for public notifications as stated in the final PIP document.

## 4.0 RESPONSE TO COMMENTS AND QUESTIONS RECEIVED DURING THE PIP PUBLIC COMMENT PERIOD

### 4.1 Response to Comments Received by The Greater Hyannis Civic Association

An email dated July 2, 2019 was received by Mr. Jack Yunits, the Barnstable County Administrator, from Ms. Deborah Krau, President of the Greater Hyannis Civic Association (GHCA), with comments and questions regarding the PFAS release at the Site and the PIP activities. The questions/comments included in the email and their respective responses are presented below. Additionally, the County and its LSP officially sent a formal written (email) response to these comments to the Ms. Krau, members of the GHCA, and Town of Barnstable officials on July 24, 2019. A copy of the letter sent to the GHCA is included in Appendix C.

1. At the GHCA forum in early June, you indicated that you would send me a copy of the weekly status reports that go to the Town Of Barnstable. To date, I have not received one.

RESPONSE: There may be a misunderstanding regarding frequency of status reports; weekly reports are not issued. Monthly Immediate Response Action (IRA) Status Reports and Remedial Monitoring Report (RMR) are submitted to MassDEP as a combined single document. These are available on MassDEP's Site Database shortly after filing accessible under the "Supporting Documents" tab of the database page for the FTA Site: RTN 4-26179.

Below is the link to the MassDEP Document Database for the BFTA.

<https://eeaonline.eea.state.ma.us/EEA/fileviewer/Rtn.aspx?rtn=4-0026179>

Many of these reports are also available on the County's website and they will be added as they are submitted to MassDEP.

The Town of Barnstable Manager, Board of Health, and Water Supply Division receive public notification letters after the submittal of each monthly IRA Status and RMR report as required by 310 CMR 40.1400. These letters provide brief summaries of the monthly status/interim reports and direction on how to obtain copies of the reports. Going forward, email notifications of each monthly status report will be issued to everyone on the Public Involvement Plan mailing list who provided an email address.

2. I believe that the Public Improvement Plan should be finalized. The GHCA had asked to be part of a citizens advisory committee. I have not heard anything and would like to know the status of our request and the plan.

RESPONSE: We assume that the reference is to the Public Involvement Plan (The PIP or Plan). Per the MCP at 40.1405(5)(b), the public comment period shall be a minimum of 20 days, as stated in the Draft PIP and at the PIP Meeting, we started the public comment period on May 3, 2019 and concluded it on May 27, 2019. The PIP has been finalized; it was submitted to MassDEP on June 27, 2019 and is posted on MassDEP's Site's Database for public review. In response to the comment, it has been posted to the Barnstable County website and will be put into the repository at the Hyannis Public Library as well (as stated in the Plan). In addition, a written notice of its availability will go out to the mailing list shortly.

In response to request for a citizen's advisory committee, MassDEP regulations for public involvement activities (the Massachusetts Contingency Plan at 310 CMR 40.1405) do not address a PIP committee or citizens committee. More importantly, a separate citizens committee seems redundant to the public involvement process. The public involvement process is designed to create a forum for the public (that are affected by the release at a Site) to advise, review plans and reports, and/or make suggestions to the County and it's LSP on matters regarding the releases and cleanup at the Site (BFTA). The primary participants in the forum, specifically the petitioners, local officials, and the active participants on the PIP mailing list, are assumed to act somewhat like an advisory committee. Both Ms. Krau and the GHCA are included on the FTA PIP Mailing List. If citizens interested in the Site (which could include the original petitioners, local officials, town organizations, and other public residents) would like to create their own committee and to participate in the public involvement process through that committee that is certainly their choice.

3. We would like to get a copy of your response to the Mass DEP letter of May 1. The responses were due by June 28, 2019. Specifically, the letter asked for:
  - a. A detailed plan for the expansion of the groundwater recovery and treatment system
  - b. A detailed plan for capping measures that can be taken to prevent infiltration of precipitation through PFAS contaminated soil at the Site
  - c. A detailed schedule for implementing the response actions requested above.

RESPONSE: On June 3, 2019, the County submitted a formal request to restore the original IRA Plan Modification Deadline to August 28, 2019. The request indicated that it was not feasible to meet the June 28, 2019 deadline and included the rationale for restoration of the original August 2019 deadline. On June 3, 2019 a letter was submitted to MassDEP's and posted on MassDEP's Site Database; a copy will be made available on the County's website. [A copy is attached for your convenience.]

The County was informed by Angela Gallagher (MassDEP) that MassDEP accepted the County's request and the deadline for the IRA Plan Modification will be restored to August 28, 2019. MassDEP has issued an email response to the County implementing the restored deadline. If Ms. Krau or the GHCA would like to inquire further on this, they may contact Angela Gallagher directly.

Angela Gallagher  
MassDEP | Bureau of Waste Site Cleanup | Southeast Regional Office  
20 Riverside Drive, Lakeville, Massachusetts, USA 02347  
Office: 508.946.2790  
Email: [angela.gallagher@mass.gov](mailto:angela.gallagher@mass.gov)

These comments should have been provided to the County during the informal 20-day comment period after the PIP Meeting on May 2, 2019. Comments such as these are important to the creation of the PIP and although the PIP can be amended to accommodate additional comments and/or changes to response actions, it prolongs the PIP process which ultimately delays response actions and cleanup at the Site.

A summary of comments received (within the public comment period) on the draft PIP was included as an attachment to the final PIP. Detailed responses to these comments are provided herein.

#### 4.2 Letter from Mr. Tom Cambareri, Hyannis resident

A letter, dated May 22, 2019, commenting on the Draft PIP was received from Mr. Thomas Cambareri; a copy is included in Appendix B. Responses to the comments and questions made in the letter follow below. They are organized by the comment number in the letter. In the interest of brevity, entire comments or questions are not repeated below; refer to the appended copy of the letter. Mr. Cambareri is the former LSP of Record for the Site and is an active member of the GHCA.

##### 1. Interviews.

RESPONSE: Mr. Cambareri appears to be referring to interviews conducted as part of the development of the Draft Public Involvement Plan; those interviews have been completed. Mr. Cambareri was not a petitioner, or a public official identified as a party to be interviewed in general accordance with the MCP or MassDEP guidance on public involvement plan procedures (which pre-dates the current MCP.) That said, Mr. Cambareri formally expressed comments and concerns at the PIP Public Meeting; responses to those are included in section 3.0 of this document. In addition, he has previously expressed comments and concerns regarding MCP response actions at the FTA in letters submitted to MassDEP.

In general, the County and its consultants are attempting to address the concerns and comments expressed by Mr. Cambareri in current and future MCP response actions within the limits of available resources and the MCP timelines for response actions.

##### 2. Local Information Repository.

RESPONSE: It is our understanding that the County website includes copies of major documents as well as links to those documents on the MassDEP webpage. The County is striving to keep the webpage current and inform the public about assessment and cleanup of the FTA and will continue to do so. All major reports will be available on the webpage in the future, if not already available. In addition, the site history on the webpage will be reviewed for accuracy and revised accordingly.

##### 3. Site Mailing List.

RESPONSE: The Site mailing list is considered a living document and will be updated as requests to be added or deleted are received; the mailing list includes email addresses (if provided) and street addresses. The mailing list as of May 27, 2019 is included as Appendix D of the final Public Involvement Plan, which was formally submitted to MassDEP on that date and is available on the County webpage for the FTA Site. Mr. Cambareri is included on the mailing list.



#### 4. Notification of Major Milestones.

RESPONSE: The final PIP notifications have been revised somewhat. Telephone notifications are no longer included as they are considered obsolete and ineffective. Email notifications (to those on the email portion of the mailing list) will be made for all submittals to MassDEP. Notifications will be made by County personnel within the limits of available resources. Written notifications to the parties on the mailing list will still be made for public comment drafts of all major submittals to MassDEP including draft IRA Plan Modifications and MCP Phase reports.

#### 5. Soliciting Public Input.

RESPONSE: Major IRA Plan Modifications are in evaluation and design at this time and will be presented in a public comment draft document to be submitted to MassDEP as such. These documents will go through the public notification and PIP review process described in the final PIP. Individual comments submitted to MassDEP by Mr. Cambareri prior to the Draft PIP will be subject to individual responses.

#### 6. Public Meetings.

RESPONSE: As stated in Section 4.5 of the final PIP document, the County will hold PIP meetings for public comment at every major milestone (during the MCP assessment process) including but not limited to: major IRA Plan Modification(s), the Phase II CSA, Phase III Remedial Action Plan (RAP), and the Phase IV Remedial Implementation Plan (RIP). Additionally, public meetings will be held on an approximate quarterly schedule to provide general updates. Separate quarterly meetings will not be held if they would be coincident with a public meeting regarding a major submittal. Additional meetings beyond these are not feasible for the County currently.

In response to request for a PIP Advisory committee, the Massachusetts Contingency Plan at 310 CMR 40.1405 does not address a PIP Advisory Committee or a citizens committee. More importantly, a separate PIP Advisory committee seems redundant to the public involvement process. The public involvement process is designed to create a forum for the public (that are affected by the release at the Site) to advise, review plans and reports, and/or make suggestions to the County and it's LSP on matters regarding MCP response actions at the Site. The primary participants in the forum, specifically the petitioners, local officials, and the active participants on the PIP mailing list, are assumed to act somewhat like an advisory committee. Mr. Cambareri is included on the BFTA PIP Mailing List. The creation of a separate PIP Advisory Committee or a third-party facilitator is not feasible for the County nor is it required by MassDEP.

Regarding MassDEP involvement, although we anticipate that MassDEP officials will periodically attend public meetings for the FTA Site, we cannot speak for MassDEP.

#### 7. Public Comment Periods.

RESPONSE: The draft and final PIP incorporate the public comment periods provided in the MCP at 310 CMR 40.1405. Monthly status reports are specifically excluded from the requirement for

public comment draft submittal per 310 CMR 1405(6)(e) 5. In addition, it is not feasible to provide public comment periods for monthly status reports. Electronic notifications of the availability of all monthly status reports, as well as correspondence with MassDEP, will be made to the mailing list (email section.) The public may submit comments on any submittal to MassDEP.

#### 8. Response To Comments.

RESPONSE: It is not feasible for County and its consultants to respond to comments on all submittals made to MassDEP, such as monthly status reports. Responses to comments on the major public comment draft documents, as provided for in the MCP and described in the final PIP, will be prepared. Individual comments submitted to MassDEP by Mr. Cambareri prior to the Draft PIP on non-major submittals will be subject to individual responses, as appropriate and as resources allow.

#### 9. Schedule for Public Involvement Activities.

RESPONSE: As noted above and in other sections of this document, major IRA Plan Modifications, including those in process now, will be subject to public meetings. In addition, approximately quarterly public meetings are planned. We believe that these and the major milestones public meetings will be sufficient to provide the public with opportunities to provide input, in conjunction with other methods noted above, such as providing comments on other documents. In addition, the final PIP includes periodic written updates on Site progress to be distributed to the mailing list.

#### 10. Revisions To the Plan.

RESPONSE: The meaning of some of these comments is not clear. The ability to revise or amend a PIP is a standard component of the process and in accordance with the MCP. Discontinuation of the PIP can only be performed in accordance with the MCP and with input from the petitioners. The PIP was finalized in accordance with the MCP.

Other.

RESPONSE: MCP response actions to address the historic petroleum releases are continuing and will also be included in the public involvement process for the Site.





Miscellaneous Document Transmittal Form

Release Tracking Number

4 - 26179

**A. DISPOSAL SITE LOCATION:**

1. Disposal Site Name: BARNSTABLE COUNTY FIRE TRAINING ACADEMY  
2. Street Address: 155 SOUTH FLINT ROCK ROAD  
3. City/Town: BARNSTABLE 4. Zip Code: 026300000

**B. THIS FORM IS BEING USED TO: (check all that apply)**

- ☐ 1. Correct typographical errors and/or make corrections that do not materially affect the nature or complexity of the response actions. If changes are materially significant, then a revised or modified submittal must be made to the Department. List the report/form that is being corrected that is associated with the above Release Tracking Number (RTN). Attach an errata sheet containing a description of the errors and/or corrections.
- | Form/Report | Submittal<br>Date(mm/dd/yyyy) | Transaction ID |
|-------------|-------------------------------|----------------|
| _____       | _____                         | _____          |
- ☐ 2. Submit other documents associated with this RTN that cannot be submitted to the Department using any other BWSC transmittal form. Do not submit documents that are of a time-critical nature and/or that require a direct response from the Department and/or that require an LSP Opinion pursuant to 310 CMR 40.0015. (Section C is not required).
- Description of Submittal \_\_\_\_\_
- ☐ 3. Resign as LSP-of-Record for the above Release Tracking Number (RTN). Attach a copy of the LSP resignation letter. (Section D, E, and F are not required).
- ☐ 4. Submit copies of Public Notices required pursuant to 310 CMR 40.1400: (check all that apply)  
(Section C is not required )
- |  |  |
|--|--|
| <input type="checkbox"/> a. Tier I Classification  | <input type="checkbox"/> Check here if submitting a copy of a legal notice |
| <input type="checkbox"/> b. Tier II Classification   | <input type="checkbox"/> Check here if submitting a copy of a legal notice |
| <input type="checkbox"/> c. Immediate Response Action (IRA)  |  |
| <input type="checkbox"/> d. Release Abatement Measure (RAM)  |  |
| <input type="checkbox"/> e. Downgradient Property Status (DPS)   |  |
| <input type="checkbox"/> f. Utility-related Abatement Measure (URAM)   |  |
| <input type="checkbox"/> g. Comprehensive Response Actions   |  |
| <input type="checkbox"/> h. Activities related to<br>recording/registering an Activity and<br>Use Limitation (AUL) | <input type="checkbox"/> Check here if submitting a copy of a legal notice |
| <input type="checkbox"/> i. Permanent or Temporary Solution  |  |

**(All sections of this transmittal form must be filled out unless otherwise noted)**



**B. THIS FORM IS BEING USED TO(cont.): (check all that apply)**

☒ 5. Submit Public Involvement Petition documents. (check all that apply). (Section C is not required).

- ☐ a. Submit a Public Involvement Petition
- ☐ b. Submit a Public Involvement Petition Retraction
- ☐ c. Submit a Positive Public Involvement Petition Designation Letter
- ☐ d. Submit a Negative Public Involvement Designation Letter
- ☐ e. Submit a Draft Public Involvement Petition Plan
- ☐ f. Submit a Revised Public Involvement Petition Plan
- ☐ g. Submit a Final Public Involvement Petition Plan
- ☐ h. Submit a Notice of Public Comment Period

Date of Close of Comment Period : \_\_\_\_\_  
(mm/dd/yyyy)

- ☐ i. Submit a copy of a Public Involvement Petition legal notice
- ☐ j. Submit a Notice of Public Meeting

Meeting Date: \_\_\_\_\_  
(mm/dd/yyyy)

☒ k. Submit other Public Involvement Petition related documents not specified above:

Describe: SUMMARY OF ALL PUBLIC COMMENTS AND EXPLANATION/RESPONSES TO COMMENTS

☐ 6. Submit a RCRA Contained-In-Determination to document that soil and/or groundwater is no longer considered a hazardous waste pursuant to state (310 CMR 30.00) and federal (Title 40, Chapter I, Part 261 of the Code of Federal Regulations) hazardous waste regulations.

☐ 7. Submit notification and documentation of Reclamation Soil Reuse pursuant to 310 CMR 40.0031(2).

**C. LSP SIGNATURE:**

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP #: \_\_\_\_\_

2. First Name: \_\_\_\_\_ 3. Last Name: \_\_\_\_\_

4. Telephone: \_\_\_\_\_ 5. Ext.: \_\_\_\_\_ 6. Email: \_\_\_\_\_

7. Signature: \_\_\_\_\_

8. Date: \_\_\_\_\_  
(mm/dd/yyyy)



**D. PERSON MAKING A SUBMITTAL:**

1. Check all that apply: ☐ a. Change in contact name ☐ b. Change of address ☐ c. Change in person undertaking response actions
2. Name of Organization: BARNSTABLE COUNTY COMMISSIONERS
3. Contact First Name: JACK 4. Last Name: YUNITS
5. Street: 3195 MAIN ST 6. Title: \_\_\_\_\_
7. City/Town: BARNSTABLE 8. State: MA 9. ZIP Code: 026300000
10. Telephone: 5083756643 11. Ext.: \_\_\_\_\_ 12. Email: JYUNITS@BARNSTABLECOUNTY.ORG
- ☐ 13. Check here if the person is a Public Involvement Petitioner

**E. RELATIONSHIP TO SITE OF PERSON MAKING SUBMITTAL:**

☐ Check here to change relationship

- ☒ 1. RP or PRP ☒ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter  
☐ e. Other RP or PRP Specify: \_\_\_\_\_
- ☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c.21E, s.2)
- ☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c.21E, s.5(j))
- ☐ 4. Any Other Person Undertaking Response Actions Specify Relationship: \_\_\_\_\_

**F. CERTIFICATION OF PERSON MAKING SUBMITTAL:**

1. I, \_\_\_\_\_, attest under the pains and penalties or perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By: \_\_\_\_\_ 3. Title: \_\_\_\_\_  
Signature

4. For: BARNSTABLE COUNTY COMMISSIONERS 5. Date: \_\_\_\_\_  
(Name of person or entity recorded in Section D) mm/dd/yyyy

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section D.

7. Street: \_\_\_\_\_

8. City/Town: \_\_\_\_\_ 9. State: \_\_\_\_\_ 10. ZIP Code: \_\_\_\_\_

11. Telephone: \_\_\_\_\_ 12. Ext.: \_\_\_\_\_ 13. Email: \_\_\_\_\_



**Massachusetts Department of Environmental Protection**  
*Bureau of Waste Site Cleanup*

**Miscellaneous Document Transmittal Form**

**BWSC 126**

Release Tracking Number

4 - 26179

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☐ Check here if any non-updatable information provided on this form is incorrect, e. g. property address. Send corrections to BWSC.eDEP@state.ma.us

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**YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.**

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Date Stamp (DEP USE ONLY):

July 24, 2019

Deb Krau, President GHCA  
Greater Hyannis Civic Association  
Hyannis, MA

Re: Response to Comments on Barnstable County Fire & Rescue Training Academy PIP

Dear Ms. Krau:

On behalf of Barnstable County, we prepared the following responses to your email questions and comments addressed to Jack Yunits, Administrator of the county.

1. At the GHCA forum in early June, you indicated that you would send me a copy of the weekly status reports that go to the Town Of Barnstable. To date, I have not received one.

RESPONSE: There may be a misunderstanding regarding frequency of status reports; weekly reports are not issued. Monthly Immediate Response Action (IRA) Status Reports and Remedial Monitoring Report (RMR) are submitted to MassDEP as a combined single document. These are available on MassDEP's Site Database shortly after filing accessible under the "Supporting Documents" tab of the database page for the FTA Site: RTN 4-26179.

Below is the link to the MassDEP Document Database for the BFTA .

<https://eeaonline.eea.state.ma.us/EEA/fileviewer/Rtn.aspx?rtn=4-0026179>

Many of these reports are also available on the County's website and they will be added as they are submitted to MassDEP. The Town of Barnstable Manager, Board of Health, and Water Supply Division receive public notification letters after the submittal of each monthly IRA Status and RMR report as required by 310 CMR 40.1400. These letters provide brief summaries of the monthly status/interim reports and direction on how to obtain copies of the reports. Going forward, email notifications of each monthly status report will be issued to everyone on the Public Involvement Plan mailing list who provided an email address.

2. I believe that the Public Improvement Plan should be finalized. The GHCA had asked to be part of a citizens advisory committee. I have not heard anything and would like to know the status of our request and the plan.

RESPONSE: We assume you are referring to the Public Involvement Plan (The PIP or Plan). Per the MCP at 40.1405(5)(b), the public comment period shall be a minimum of 20 days, as stated in the Draft PIP and at the PIP Meeting, we started the public comment period on May 3, 2019.

That being said, we have finalized the Plan. The PIP was finalized, submitted to MassDEP and, as of June 27, 2019, it is posted on MassDEP's Site's Database for public review. In response to the comment, it has been posted to the Barnstable County website and will be put into the repository at the Hyannis Public Library as well (as stated in the Plan) on July 26, 2019. In addition, a written notice of its availability will go out to the mailing list shortly.

In response to request for a citizen's advisory committee, MassDEP regulations for public involvement activities (the Massachusetts Contingency Plan at 310 CMR 40.1405) do not address a PIP committee or citizens committee. More importantly, a separate citizens committee would seem redundant to the public involvement process.

The public involvement process is designed to create a forum for the public (that are affected by the release at a Site) to advise, review plans and reports, and/or make suggestions to the County and it's LSP on matters regarding the releases and cleanup at the Site (BFTA). The primary participants in the forum, specifically the petitioners, local officials, and the active participants on the PIP mailing list, are assumed to act somewhat like an advisory committee. Both yourself and the GHCA are included on the living BFTA PIP Mailing List. We included a brief response to this request in the Final PIP stating that the creation of a separate PIP committee is not feasible for the County nor is it required by MassDEP.

If the citizens interested in the Site (which could include the original petitioners, local officials, town organizations, and other public residents) would like to create their own committee and to participate in the public involvement process through that committee that is certainly their choice.

3. We would like to get a copy of your response to the Mass DEP letter of May 1. The responses were due by June 28, 2019. Specifically the letter asked for:
  - a. A detailed plan for the expansion of the groundwater recovery and treatment system
  - b. A detailed plan for capping measures that can be taken to prevent infiltration of precipitation through PFAS contaminated soil at the Site
  - c. A detailed schedule for implementing the response actions requested above.

RESPONSE: On June 3, 2019, the County submitted a formal request to restore the original IRA Plan Modification Deadline to August 28, 2019. The request included the rationale for the request, which indicated that it was not feasible to meet the June 28, 2019 deadline. On June 3, 2019 a letter was submitted to MassDEP's and posted on MassDEP's Site Database and will be made available on the County's website. A copy is attached for your convenience.

The County was informed by Angela Gallagher (MassDEP) that MassDEP accepted the County's request and the deadline for the IRA Plan Modification will be restored to August 28, 2019. MassDEP has issued an email response to the County implementing the restored deadline. If Ms. Krau or the GHCA would like to inquire further on this, they may contact Angela Gallagher directly.

Angela Gallagher

MassDEP | Bureau of Waste Site Cleanup | Southeast Regional Office

20 Riverside Drive, Lakeville, Massachusetts, USA 02347

Office: 508.946.2790

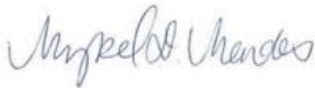
Email: [angela.gallagher@mass.gov](mailto:angela.gallagher@mass.gov)

These comments should have been provided to the County during the informal 20-day comment period after the PIP Meeting on May 2, 2019. Comments such as these are important to the creation of the PIP and although the PIP can be amended to accommodate additional comments and/or changes to response actions, it prolongs the PIP process which ultimately delays response actions and cleanup at the Site.

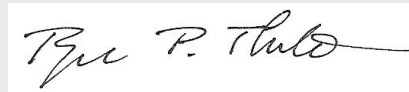
A summary of comments received (within the public comment period) on the draft PIP was included as an attachment to the Final PIP. Detailed responses to these comments will be provided in a separate document to be shared with the public in the near future.

If we can be of any further assistance regarding this matter, please contact us at our office.

Very truly yours,  
BETA Group, Inc.



Mykel Mendes  
Environmental Engineer



Roger P. Thibault P.E., LSP  
Senior Environmental Engineer

cc: Jack Yunits, Barnstable County Administrator  
Steve Tebo, Assistant County Administrator

Attachments: June 3, 2019 Letter to MassDEP Submittal

Job No:[6206]



May 31, 2019

Bureau of Waste Site Cleanup  
Southeast Regional Office  
Massachusetts Department of Environmental Protection  
C/o Angela Gallagher  
Site Remediation Section  
20 Riverside Drive  
Lakeville, MA 02347

RE: **MassDEP Request For Expedited IRA Plan Modification/Interim Deadline Enforcement Document No. 00006694**  
Barnstable County Fire - Rescue Training Academy Site  
155 South Flint Rock Road  
Hyannis, Massachusetts  
**DEP Release Tracking No. 4-26179**

Dear Ms. Gallagher:

On the behalf of, and in conjunction with Barnstable County, Nover-Armstrong, A Division of BETA Group, Inc. (BETA) has prepared this letter in response to the *Request For Expedited IRA Plan Modification/Interim Deadline Enforcement Document No. 00006694* from the Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup, Southeast Regional Office dated May 1, 2019 ("MassDEP May 1, 2019 IRA Request") regarding the Barnstable Country Fire - Rescue Training Academy (the FTA or facility) Site, which is undergoing assessment and cleanup under the Massachusetts Contingency Plan, 310 CMR 40.0000 (MCP).

Barnstable County shares with MassDEP, the Town of Barnstable, and the residents of Barnstable the concerns for protecting the water supply and its consumers from the unintentional release of perfluoralkyl substances (PFAS) at the Site. But, these concerns must be balanced with those of realistic and limited resources of Barnstable County to maintain public safety readiness while addressing the historic contamination, and practical constraints on performing MCP response actions.

#### **Request For Restoration of Original IRA Plan Modification Deadline**

In the May 1, 2019 IRA Request, MassDEP requested two expedited Immediate Response Actions (IRAs): 1) a detailed plan to expand the groundwater recovery and treatment system, and 2) a detailed plan for capping measures to prevent infiltration of precipitation through PFAS-contaminated soil at the Site. These detailed plans are to be presented in an expedited IRA Plan Modification by June 28, 2019. Therefore, the May 1, 2019 IRA Request directed that the IRA Plan Modification be moved up from the



August 28, 2019 date (on or about) imposed by the *Notice of Audit Findings/Compliance and Technical Assistance/Interim Deadline* dated November 21, 2018 (NOAF/Interim Deadline) to June 28, 2019.

Meeting the new deadline is not feasible. Barnstable County officially requests the IRA Plan Modification be restored to the original date of August 28, 2019. The explanation for the requested deadline restoration is presented separately for each “detailed plan”, below.

Separately, Barnstable County, through its consultant and contractors, intends to provide additional, temporary groundwater treatment capacity at the Site via implementation of a rented, mobile unit as soon as practical. As reported in recent IRA Status Reports and Remedial Monitoring Reports (RMRs), maintenance work at the Site has resulted in a return to relatively high groundwater flows from the existing recovery well, PRW-4. However, these flow rates exceed the effective capacity of the existing granular activated carbon (GAC) to remove PFAS compounds down to low concentrations. The rented unit will be equipped with the same components and treatment process, GAC vessels and related equipment, as the existing groundwater treatment system to allow treatment of the full flow from the recovery well. The rented unit will operate in parallel to the current system. This work is considered a continuation of the original IRA Plan work and an extension of the current groundwater recovery and treatment IRA. The implementation will be described in future IRA Status reports.

#### **Request For Expedited IRA Plan Modification No. 1**

Barnstable County and its consultant, BETA, intends to propose an IRA Plan Modification for expansion of the groundwater recovery and treatment in addition to the rented treatment unit. The IRA Plan Modification will focus on the siting and details of an additional groundwater recovery well at the Site. However, the June 28, 2019 deadline is not feasible to achieve based on the following.

1. The updated Site-wide groundwater data must be evaluated in the context of all available surficial geology data to support selection of a new location and design of an additional groundwater recovery well.
2. Potential conflicting historic information on the property lines of the FTA must be resolved.
3. Hydrogeologic evaluations must be performed on proposed new well locations before related logistical and approval work, which may affect the viability of a final new well location, can proceed.
4. It is possible that a preferred new well location may be on property owned/controlled by other parties. Obtaining preliminary approval for such a proposed installation must be obtained from potentially adversarial parties, at least on a preliminary basis, before the IRA Plan Modification is prepared.

It is anticipated that the work to address these factors will occupy most of the limited time until the original August 28, 2019 deadline. It is not feasible to conduct this work/obtain these approvals by June 28, 2019.

In addition, the request for restoration of the original deadline must be presented with caveats:

1. Barnstable County is a government entity chartered by the Massachusetts Legislature in 1988. Funding for the expansion must be available and appropriated. The design, specification and cost estimating of the expansion (new well, electric service and force main to convey the water to the treatment building area) must be completed before appropriation for funding the work can be completed. Given the tasks that must be performed and the relatively short deadline that August 28, 2019 represents, it may not be possible to complete final authorization by the County Commissioners by that date. Therefore, the IRA Plan Modification may have to be qualified by “pending appropriation” or similar qualifier.
2. The Site has been designated a Public Involvement Plan Site. It is not possible to conduct the evaluations and tasks noted above, prepare a Draft IRA Plan Modification (for the groundwater pump and treat expansion), vet it through the public meeting and public comment period processes (in accordance with the MCP and the Draft Public Involvement Plan), and finalize it by the original deadline (August 28, 2019). Given the tasks that must be performed and the relatively short time, it must be understood the requested IRA Plan Modification prepared by August 28, 2019 will be a public comment Draft IRA Plan Modification ready for distribution under the public involvement process for the Site.

#### **Requests For Expedited IRA Plan Modification No. 2**

Barnstable County and its consultant, BETA, intends to propose an IRA Plan Modification for capping portions of the Site affected by PFAS soil impacts. However, the June 28, 2019 deadline is not feasible to achieve based on the following.

1. The only available PFAS soil data for the Site is from 2015. There is only limited documentation of how those data were developed and that assessment work pre-dates evolution of the state of the science of assessment for PFAS and MassDEP published guidance on proper sampling methods and precautions for PFAS.
2. The Site is in Phase II Comprehensive Site Assessment (Phase II CSA). The 2015 data points are from relatively wide-spaced soil borings across Site. Confirming the validity of the 2015 soil data and extending the soils data horizontally and vertically is required to meet Phase II CSA requirements and to design an effective capping system, or select priority areas for capping. It is not feasible to execute an updated soil assessment program, including waiting for laboratory results, and then interpret those results by June 28, 2019. In addition, these steps must precede rationale design of a cap or partial cap.
3. MassDEP recently published proposed MCP Method 1 soil risk standards for PFAS. The proposed S-1 / GW-1 standard is a very low concentration, set by default as the typically achievable laboratory reporting limit. It is acknowledged that PFAS soil concentrations at the Site significantly exceed the proposed S-1/GW-1 soil risk standard. However, the Proposed 2019 MCP Revisions for PFAS in soils do not address critical details and the basis for the actual risk standard itself may be subject to extensive comment and revision. The establishment of final, defensible MCP soil risk standards, the methodologies by which to obtain data to compare to those standards, and the comparison of updated Site soils data to those standards is fundamental to a rationale design

approach to capping the Site or prioritizing the areas to be capped. Although final PFAS in soil risk standards will not be available by the August 28, 2019 deadline, the vetting of the proposed risk standards will be significantly advanced by that time, in comparison to June 28, 2019.

4. The final disposition of the Site for fire suppression training must be resolved by the Academy administration and the County Commissioners in order to proceed with cap design.
5. Preliminary disposition of the structures on the Site that were used for fire suppression training must be resolved by the Academy administration and the County Commissioners, funding procured for all aspects of demolition (if they will be demolished), and demolition at least definitively scheduled to proceed with cap design.
6. A new capping system will, by definition, significantly increase stormwater runoff from the new, large impervious surface. The design will most likely require extensive pre-permitting review by the Barnstable Conservation Commission and may require collaborative and innovative approaches with the owners of abutting properties in order to achieve the performance standards of the Wetlands Protection Act and Mass. Stormwater regulations. This time consuming process cannot be accomplished by the June 28, 2019 deadline. This does not include the time consuming, Notice of Intent process, which must be conducted only based on a final design. Final design will not proceed until after approval of the IRA Plan Modification.
7. As with the Request No. 1, the finalization of an IRA Plan Modification for Request No. 2 cannot be conducted under the Public Involvement Plan process by June 28, 2019.

In addition, the request for restoration of the original deadline for requested IRA Plan Modification No.2 must include the same caveat regarding the Public Involvement Plan process. It is not possible to conduct the evaluations and tasks noted above, prepare a Draft IRA Plan Modification, and vet it through the public involvement process by August 28, 2019. Given the tasks that must be performed and the relatively short time, it must be understood the requested IRA Plan Modification prepared by August 28, 2019 will be a public comment Draft IRA Plan Modification ready for distribution under the public involvement process for the Site.

### **Minor Correction**

We note that the MassDEP May 1, 2019 IRA Request states that IRA Status Report No. 27 was received on March 12, 2019. We respectfully request correction to that statement; our records and the MassDEP Searchable Sites Database clearly show that IRA Status Report No. 27 was duly filed via eDEP on February 28, 2019.

### **Summary and Conclusions**

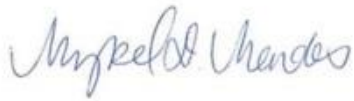
Barnstable County shares with all potentially affected parties the concern for protecting the water supply. The County proposes to meet the original request for detailed plans for IRA Plan Modifications by the original August 28, 2019 deadline. It is not feasible to meet the June 28, 2019 deadline; the original deadline of the next major IRA Status Report (six months from February 28, 2019) allows the minimum

practical time to develop such plan modifications. Formal revision of the May 1, 2019 directive is respectfully requested.

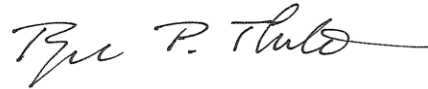
In addition, for the reasons indicated above, it must be understood that: a) the August 28, 2019 deadline may be conditional in terms of funding authorization, and b) a public comment Draft IRA Plan Modification, which has not gone through the PIP process, will be prepared by the August deadline.

Sincerely,

Nover-Armstrong, A Division of BETA Group, Inc.



Mykel Mendes  
Project Engineer



Roger Thibault, P.E., LSP  
Senior Environmental Engineer

cc: Jack Yunits, Barnstable County Administrator  
Steve Tebo, Barnstable County Assistant County Administrator



# Greater Hyannis Civic Association

PO Box 783  
W. Hyannisport, MA 02672  
Email: GreaterHyannis@aol.com  
Website: www.hyanniscivic.com

*emailed  
to Del 3-25-19*

March 20, 2019

Deb Krau  
*President*

Ed Maroney  
*Vice President*

Larry Decker  
*Treasurer*

Ralph Krau  
*Executive Secretary*

## Directors

Laura Cronin

Debra Dagwan

Alan Feltham

David Jones

Fred LaSelva

Paul Niedzwiecki

Brad Pfeifer

Uta Quint

Jane Walsh

Past President  
Bill Cronin

Dear Commissioners:

The following letter was approved unanimously by the board of the Greater Hyannis Civic Association on March 12, 2019.

Board of Barnstable County Commissioners  
Barnstable MA

Dear Commissioner Beaty, Bergstrom and Flynn,

The Greater Hyannis Civic Association requests a full public hearing on the need to move the Barnstable County Training Academy from its location amid our public drinking water wells and to require the county to restore the areas polluted during its activities there.

The time is long past that such intensive uses can be allowed in water supply areas. We recognize that efforts have been made by the county to restore the site, but we reject the idea of continuing operations there. The unforeseen consequences of earlier training uses led to well shutdowns and the need for costly connections to the Yarmouth system for safe drinking water. We are not interested in taking further risks for a program that can and should be shut down and relocated immediately.

Economic benefits accruing to the training academy should not outweigh the health concerns of the common good. Please act now to ensure the protection of the public's health and the proper relocation of the academy.

Sincerely,

Deborah Krau  
President  
Greater Hyannis Civic Association

cc: Barnstable Town Council  
Mark Ells, Barnstable Town Manager  
Jack Yunits, Barnstable County Administrator

Tom Cambareri  
62 Joan Road  
Centerville, MA 02632  
[tomcambareri@gmail.com](mailto:tomcambareri@gmail.com)  
508-364-2644

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Jack Yunits  
County Administrator  
Barnstable County  
Main Street  
Barnstable, MA 02630  
[jack.yunits@barnstablecounty.org](mailto:jack.yunits@barnstablecounty.org)

Millie-Garcia-Suerrano, MPH  
Regional Director  
MassDEP-Southeast Regional Office  
20 Riverside Drive, Lakeville, MA 02347  
[millie.garcia-serrano@state.ma.us](mailto:millie.garcia-serrano@state.ma.us)

Mr. Yunits,

I have reviewed the Draft Public Involvement Plan as prepared by Nover-Armstrong – BETA dated May 2019 and am submitting comments to the County. I will confine my comments to the Draft PIP as outlined in section 4 of the report.

1. Interviews – How will the County identify the people to interview? Where will they be listed? Will notes on the concerns raised be identified? As a resident expert have I been identified as a person to be interviewed?
2. Local Information Repository –The County website provides a link to the DEP website for digital copies of documents. The site history included on the County website is inaccurate and should be a subject for public review and comment.
3. Site Mailing list – All are interested in seeing the draft list of people that are on the mailing list. Please confirm my inclusion on the list.
4. Notification of major milestones, reports and activities – The items listed for notification are very broad, but they are not specific. I suggest that every submittal to DEP through eDEP be identified for notification by email. These would include the monthly remedial monitoring reports and status reports, , draft and final IRA Modifications and responses to Notice of Audit Findings. The PIP proposed notification of field work “to the people on the notification list” by telephone is vague and seemingly onerous if all listed people on the mailing list are the people. Please be specific about who gets called and include an email advisory to others on the mailing list.

5. Soliciting Public Input- The PIP proposes formal public comment for major reports and Remedial plan modifications. Several IRA Plan modifications are now underway. The DEP letter of May 1 requests the County respond with a detailed plan for the following by June 28<sup>th</sup>. These plans should be part of the public comment and input before finalizing.

1. A detailed plan for the expansion of the groundwater recovery and treatment system;
2. A detailed plan for capping measures that can be taken to prevent infiltration of precipitation through PFAS-contaminated soil at the Site; and
3. A detailed schedule for implementing the response actions requested above.

I have submitted comments to DEP on the several Nover-Armstrong submittals including the Phase 1 Assessment, the Phase II Scope of Work, IRA Modification and the County response to the November DEP Notice of Audit findings. Please include these comments as part of the public comment record on the site. The documents are available at the following link.

<https://1drv.ms/f/s!Ar0Zz3hc2pXMv02rYTPMMcr-XkeS>

6. Public Meetings – The list of proposed meetings follows a strict regulatory path through the MCP regulations. Public meetings should be on a more frequent basis, at least quarterly. The meetings should include the establishment of a PIP Advisory committee with appropriate resources as the community. The role of the DEP in the PIP is not clear. Will the DEP have the appropriate resources to participate in PIP meetings? The PIP should consider the need for a third-party facilitator to organize the initial meetings as soon as possible.
7. Public Comment Periods – Again the Draft PIP proposes the strict regulatory list of milestones for its public comment. There are numerous opportunities for public comment through monthly submittals to eDEP, IRA Modifications, responses to DEP information requests and notices of audit findings and monitoring plans.
8. Response to Comments – responses to comments should be for any document used to propel the cleanup of the site forward. I have submitted several formal comment letters to the DEP, as indicated above. These should be included in the formal public comment record for the site.
9. Schedule for Public Involvement Activities – Again, the listed schedule is driven by the MCP regulatory process not and Public process that seeks regular involvement of the community. The County and DEP are presently evaluating IRA modifications that are informed through the existing comprehensive data on the site (see map below). As such the actions under discussion are more comprehensive than an ordinary Immediate response actions. It would be beneficial to understand if the actions contemplated fall short or exceed what might be expected subsequent to the Phase II Assessment. In other words how much more data is necessary before a BIG picture Conceptual Site Model drives the selection of a longer term solution?
10. Revisions to the Plan – This section indicates that the PIP may be revised or discontinued. I disagree that this is a serious part of the Draft PIP. The Draft PIP should be finalized first. The Draft PIP does not indicate with a schedule how and when the Draft PIP will be finalized.



Thank you for the County's PIP response to the Hyannis citizen's that have expressed their interest in cleaning up groundwater and have been exposed to contamination emanating from the BCFTA for the last 5 decades. On that note please recall that the BFTA is still a site with petroleum hydrocarbon contamination with the RTN of 4-000190. The Draft PIP neglects to include the petroleum hydrocarbon contamination with an artificial distinction that it does not merit the public's interest. The petroleum hydrocarbon history of pump and treats, vapor extraction, and soil removals has played a significant part in what we see in the configuration of PFAS contamination at the site.

Sincerely,

Tom Cambareri  
CGWP, LSP  
Hyannis Property Owner

CC: email distribution

