

Chelmsford Water District PFAS Summary and Update

October 13, 2023

The Chelmsford Water District will be providing updates. The District will continue to monitor for PFAS6 in its finished water and will update the public regarding any actions or issues related to potential PFAS contamination that may be found in its water. If you need any additional information or clarification on any of these items, contact Todd Melanson, Environmental Compliance Manager at 978-256-2931 tmelanson@chelmsfordwater.com

Regulatory summary and update:

On October 2, 2020, MassDEP published its PFAS public drinking water standard (MCL) of 20 nanograms per liter (ng/L) or ppt- individually or for the sum on the concentrations of six specific PFAS compounds. These PFAS are perfluorooctane sulfonic acid (PFOS); perfluorooctanic acid (PFOA); perfluorohexane sulfonic acid (PFHxS); perfluoronononic acid (PFNA); Perfluoroheptanoic acid (PFHpA); and perfluorodecanoic acid (PFDA). MassDEP abbreviates this set of six PFAS as “PFAS6”.

Chelmsford Water District Action Summary: Second violation of the MassDEP’s PFAS MCL has occurred in the Third Quarter of 2023. Once MassDEP has approved the form, a formal public notice will be forth coming soon and direction on the rebate program process.

The July pre-regulatory sampling as well as the initial regulatory and confirmatory sampling rounds which occurred in November and December 2020 were posted on the District’s Summary and Update of **January 21, 2021**. All the individual and quarterly results for 2021 were posted on the District’s Summary and Update. All Summary and Updates are online at the District’s website: [District PFAS Summary and Updates | Chelmsford Water District](#)

The 2023 Monthly Compliance Sampling and Quarterly results are shown in ppt and special notes (*):

2 nd Quarterly Results		2023			2023 Quarterly Average				MADEP MCL
Sample Dates:	April-2023	May-2023	Jun-2023	Jan-Mar	April-June	July-Sept	Oct-Dec		
				1st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr		
CS WTP	9.8	18.9	19.1	14	15.9	23	0	20	
RN WTP	14.3	16.7	14.1	14	15.0	19	0	20	
SS WTP	NT	NT	NT	NA *	NA *	NA *	0	20	

*: The Smith Street Plant was shut down in late October 2022 for the winter period and not subject to sampling. It will be resampled when it comes **back online in the Summer of 2024**.

The sampling result required the District to continue monthly compliance monitoring which was initiated in January 2021. **The 2021 Third Quarterly Results of 21 ppt violated the PFAS6 MCL of 20 ppt and now again for the Third Quarter of 2023 at an amount of 23 ppt. Both violations have occurred only at the Crooked Spring WTP.** These violations are a Tier 2 violation and require a formal MassDEP approved Public Notice which has been or will be

distributed. The District has formally received its Notice of Noncompliance (NON) and has responded to MassDEP's issues and concerns.

Given the return of the Crooked Spring Water Treatment Plant (WTP) to PFAS levels above the Massachusetts State MCL level, the short-term action plan requiring the implementation of a rebate program is now being activated until such time as the District's long-term plan of treatment is in effect. The District has focused on completing the process of the final solution for the Crooked Spring WTP. The District's PFAS treatment pilot study performed under the MassDEP PFAS Grant/Reimbursement for Engineering and Design Work for PFAS Remediation, was completed and submitted, with the best option for treatment at the Crooked Spring WTP being referred to MassDEP for review. The District's chosen Engineering Firm, AECOM, has completed the evaluation of the pilot testing with some additional testing which has led to a completed draft solution. Upon discussing the issues with AECOM engineers, the District leadership agreed that all the District's treated water from all three water treatment plants will be treated for the PFAS contamination. The next phase of the process is the final engineering report and design of the PFAS treatment for all three plants. The Engineering design cost warrant article was approved at the 2023 District Annual Meeting on April 27th, **which allowed the District to apply for a Drinking Water State Revolving Fund (DWSRF) loan in August 2023.** Once or if approved by the Clean Water Trust (CWT), this will be followed by an Annual District Meeting article and then an Invitation for Bid for the construction of the additional treatment.

There is new information on a couple of items concerning the PFAS issue:

- The Environmental Protection Agency has finally issued its draft regulations for Maximum Contamination Limit (MCL) for PFAS Compounds. The initial draft includes MCLs for PFAS and PFOS at 4 ppt each and a Hazard Index Calculation for 4 other compounds. The District is in no current danger of violating this Hazard Index Calculation but the 4 ppt for PFOA and PFOS does affect the District. If these levels are approved, the District will have to treat and maintain below these levels, and these levels would then affect the timespan of the treatment media.
- The Class Action Lawsuit the District is involved in with multiple different water utilities nationally is underway. It is now termed Multiple District Litigation (MDL). There is an initial settlement resolution with 3M for \$10.2 billion to \$12 Billion. Other settlements are to follow once the initial settlement is finalized.