



April 26, 2023 File No.03.0032220.31

Mr. Michael Gray, P.E. Public Works Director Town of Jamestown 93 Narragansett Avenue Jamestown, Rhode Island 02835

Re: January and June 2022 Groundwater Sampling Results & Proposed Residential Well Sampling Former Jamestown Landfill

Dear Mr. Gray:

At your request, GZA GeoEnvironmental, Inc. (GZA) has prepared this letter which briefly summarizes the results of groundwater samples collected and analyzed for Per- and Poly-Fluoroalkyl Substances (PFAS), from monitoring wells located around the Town of Jamestown (Town) former landfill on North Main Rd. Additionally, we have provide recommendations to sample and analyze select residential water supply wells at those properties located adjacent to the landfill in response to a recent request made by the Rhode Island Department of Environmental Management (RIDEM).

BACKGROUND

On January 19, 2021, the Rhode Island Department of Environmental Management (RIDEM) issued a letter notifying all Landfill Owners or Responsible Parties of their requirement to sample and analyze groundwater for Per- and Polyfluoroalkyl Substances (PFAS) according to Section 2.1.8.F(1)(h) of the newly promulgated Solid Waste Regulation No 2.

In accordance with RIDEM's January 2021 letter request, GZA (on behalf of the Town) conducted two rounds of groundwater monitoring, once during the approximate seasonal low time frame and once during the approximate seasonal high groundwater time frame. On January 28, and June 22, 2022, GZA collected groundwater samples for PFAS analysis from 10 existing perimeter groundwater monitoring locations (GZ-1, GZ-2, GZ-3, GZ-4, GZ-5, GZ-6, GZ-75, GZ-7D, GZ-8 and GZ-9), at the former landfill. Well locations and other relevant Site features are shown on Figure 1 of the attached September 13, 2022, PFAS Assessment Investigation Results Report. Groundwater at the Site generally flows in a southwesterly direction. Groundwater samples were collected in general accordance with US EPA's September 2017 Low Stress (low flow) Purging and Sampling Procedures as well as GZA's internal PFAS Sampling SOP. The groundwater samples were submitted to Eurofins Laboratory (Eurofins) of North Kingstown, Rhode Island for analysis of 25 PFAS compounds via EPA Method 537M.

Note that the sole purpose of the initial investigation was to evaluate groundwater baseline PFAS concentrations, at the landfill. Groundwater at the Site had previously been evaluated for a broad range of other compounds.



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RESULTS

PFAS results were compared to the EPA health advisory of 70 parts per trillion (ppt)¹ for PFOS and PFOA (and the sum of the PFOS and PFOA concentrations). PFOS and/or PFOA concentrations were detected in samples collected from all six downgradient monitoring wells (GZ-2, GZ-3, GZ-75, GZ-7D, GZ-8 and GZ-9). Only at three of the six downgradient monitoring wells (GZ-2, GZ-7S and GZ-8) were the concentrations of PFOS and/or PFOA in excess of the EPA's 70 ppt Health Advisory. None of the four upgradient/cross gradient wells (GZ-1, GZ-4, GZ-5 and GZ-6) reported concentrations of PFOS/PFOA in excess of the 70 ppt Health Advisory during either the January or June 2022 sampling events.

The results from the January and June 2022 sampling events indicate that PFAS are present in groundwater at those monitoring wells within the landfill. The highest detected concentrations were identified in samples collected from downgradient well GZ-2 during both monitoring rounds.

This data indicates that concentrations of PFAS are generally elevated in downgradient wells across the Site. Two of the four upgradient/crossgradient wells were impacted by PFOS/PFOA; however, not above 70 ppt. The PFAS concentrations reported did not vary significantly between seasonal high and seasonal low groundwater conditions.

RECOMMENDED SAMPLING OF DOWNGRADIENT RESIDENTIAL WELL

After review of the baseline PFAS testing completed at the landfill, the RIDEM requested that the Town of Jamestown identify and sample select residential drinking water wells immediately downgradient (groundwater flows to the southwest) of the landfill. These wells should be analyzed for the 25 PFAS compounds via EPA Method 537M, which included PFOS/PFOA.

In review of potential subject properties, one downgradient property (Town of Jamestown Plat 2 Lot 241; 1180 North Main Road) with a private drinking water well is located approximately 0.05 miles south of the landfill. An additional five properties (lots 483, 562, 567, 480 and 545), located in a southwesterly direction from the landfill, are recommended for sampling as these well would be considered downgradient for the landfill. It should be noted that the residences on these five properties are approximately 0.25 miles downgradient and there is a wetland between the landfill and residential properties.

In addition to the RIDEM requested downgradient sampling, GZA recommends collecting samples from six upgradient residential properties that abut the landfill property (lots 10, 31, 246, 43, 44 and 45). Although PFAS was previously detected in only two of the four onsite upgradient wells, well below the 70 ppt health Advisory, the recommendation for one round of upgradient residential well sampling is to provide upgradient abutters with analytical confirmation of groundwater concentrations. Lots recommended for proposed sampling are shown of Figure 2.

GZA, Jamestown's environmental consultant, will request access to these properties to collect a representative drinking water sample for PFAS analysis. The sample will be collected from an outdoor spigot (if present) or from an interior faucet. The preferred sampling point is the first spigot after water enters the residences. Sampling will be scheduled in advance with the property owner and take approximately 30 minutes per residence. The property owners will be

¹ On June 27, 2022, Rhode Island enacted law H7223/S2298 which set an interim drinking water standard for the state of 20 parts per trillion (ppt) for six specific PFAS compounds – PFOA, PFOS, PFHxS, PFNA, PFHpA and PFDA. This law requires RIDEM to establish enforceable groundwater standards for these six compounds on or before December 31, 2023. The new law also requires Rhode Island Department of Health to establish similar standards for PFAS in drinking water on or before June 1, 2024.



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provided with a copy of the laboratory testing results along with an explanation of their meaning with respect to applicable or relevant drinking water quality criteria.

PFAS REGULATIONS

The initial two rounds of baseline sampling were conducted in January and June of 2022; since then, the State passed house bill (HB7233) on June 21, 2022 and was signed by the governor shortly thereafter. It adopted a 20 ppt drinking water standard for 6 PFAS compounds and required the Rhode Island Department of Health (RIDOH) to develop regulations for public water supplies by July 1, 2023. This 20 ppt MCL is significantly lower than the previous 70 ppt EPA health advisory. This bill does have an impact on groundwater and surface water regulations. It requires RIDEM to adopt standards by Dec 31, 2023. However, because potable water supply wells rely on groundwater recharge, it is GZA's opinion that the RIDEM will implement a 20 ppt for GA/GAA groundwater (applicable to properties surrounding the landfill). In addition, on March 14, 2023, EPA issues a revised DRAFT PFAS National Primary Drinking Water Regulation for PFAS. If approved, the proposed criteria of 4 ppt for PFOA and PFOS will become enforceable. These concentrations are lower that the proposed RIDEM criteria which may impact additional wells surrounding the landfill where potable water supplies are used.

PFAS HEALTH EFFECTS

The public is primarily exposed to PFAS compounds via the ingestion pathway from drinking contaminated water, eating contaminated food, or via consumer products that have been treated with or contain PFAS compounds. In occupational settings, where workers are manufacturing or using PFAS compounds in production processes, the inhalation pathway is the primary route of exposure. After a PFAS compound enters the body, the body reacts to it in different ways depending on the specific PFAS compound. The physical structure, chain length, and chemical composition of the various PFAS compounds impact how the body reacts to or responds to the PFAS chemical. PFAS compounds that have a longer chain length, and more branching are eliminated from the body at a slower rate; whereas shorter PFAS compounds are excreted from the body more readily.²

An on-going study of the United States population, by the U.S. National Health and Nutrition Examination Survey (NHANES), has detected select PFAS compounds (PFOS, PFOA, PFHxS, and PFNA) in the blood of more than 98% of Americans.³ Possible relationships exist between exposure to PFAS compounds and health effects; however, direct causal links between human exposure and health effects have not been confirmed. According to the Agency for Toxic Substances and Disease Registry (ATSDR), some research studies have identified that exposure to high levels of certain PFAS compounds in humans may lead to:

- Increased cholesterol levels;
- Changes in liver enzymes;
- Small decreases in infant birth weights;
- Decreased vaccine response in children;
- Increased risk of high blood pressure (preeclampsia) in pregnant women; and
- Increased risk of kidney or testicular cancer.⁴

² Barlow CA, Kemp MJ, Boyd CA, Parr KAH. PFAS Toxicology – The science behind the variations in drinking water standards. The Journal of the New England Water Works Association. December 2019. Volume 133, No. 6

³ Calafat 2019. Polyfluoroalkyl Chemicals in the U.S. Population, Data to on the National Health and Nutrition Examination. Survey (NHANES) 2003–2004 and Companisons with NHANES 1999–2000 - PMC (nih.gov)

⁴ ATSDR November 1, 2022. Per- and Polyfluoroaikyl Substances (PFAS) and Your Health. Available at: https://www.atsdr.cdc.gov/pfas/index.html



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The data set on the possible health effects associated with PFAS exposure is continually growing and evolving as new research is underway to better understand potential risks associated with exposure to the various PFAS compounds. Currently, there are not federally mandated and enforceable drinking water standards for PFAS levels in drinking water. The lack of federal guidance has led to a range of state-developed drinking water guidelines for multiple PFAS compounds.

If you should have any questions please feel to contact us at erik.beloff@gza.com or Edward.summerly@gza.com.

Very truly yours,

Erik M. Beloff

Project Manager

Consultant / Reviewer

Edward A. Summerly, P.G. NY, KY District Office Manager/Sr. Principal

Attachment:

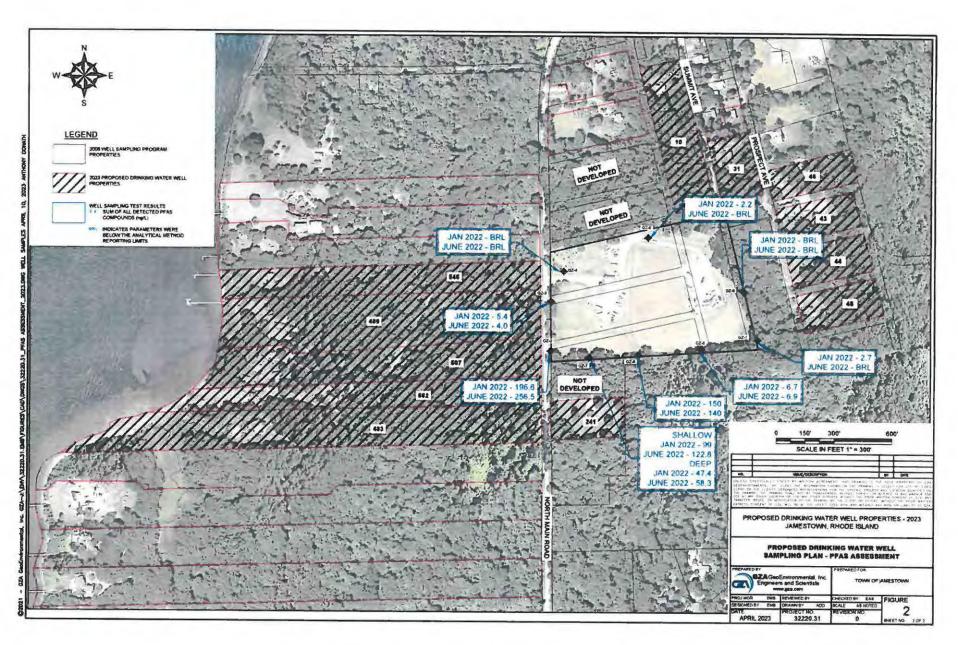
Figure 2

PFAS Assessment Investigation Results

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FIGURE 2





PFAS ASSESSMENT INVESTIGATION RESULTS





September 13, 2022 File No. 03.0033320.31

Ms. Kasie McKenzie Rhode Island Department of Environmental Management Office of Land Revitalization & Sustainable Materials Management 235 Promenade Street Providence, RI 02908

Re: PFAS Assessment Investigation Results Former Jamestown Landfill Jamestown, Rhode Island

Dear Ms. McKenzie:

GZA GeoEnvironmental, Inc. (GZA) is pleased to provide these results associated with the *Proposal* for PFAS Manitoring Services dated September 23, 2021, conducted at the above referenced facility. GZA conducted this work in January and June 2022. This report, our findings and opinions are subject to the limitations provided in Attachment A.

BACKGROUND

On January 19, 2021, the Rhode Island Department of Environmental Management (RIDEM) issued a letter notifying all Landfill Owners or Responsible Parties of their requirement to sample and analyze groundwater for Per-and Polyfluoroalkyl Substances (PFAS) according to Section 2.1.8.F(1)(h) of the newly promulgated Solid Waste Regulation No 2.

On January 28, and June 22, 2022, GZA collected groundwater samples for PFAS analysis from 10 existing groundwater monitoring locations (GZ-1, GZ-2, GZ-3, GZ-4, GZ-5, GZ-6, GZ-75, GZ-7D, GZ-8 and GZ-9). Well locations and other relevant Site features are shown on Figure 1. Groundwater samples were collected in general accordance with US EPA's September 2017 Low Stress (low flow) Purging and Sampling Procedures as well as GZA's internal PFAS Sampling SOP. The groundwater samples were submitted to Eurofins Laboratory (Eurofins) of North Kingstown, Rhode Island for analysis of 25 PFAS compounds via EPA Method 537M.

Note that the sole purpose of the investigation is to evaluate baseline PFAS levels in groundwater. Groundwater at the Site has previously been evaluated for a broad range of other compounds. No other constituents were tested as part of this study.

LABORATORY RESULTS

The January and June 2022 groundwater analytical results have been summarized in attached Table 1. PFAS results were compared to the EPA health advisory of 70 parts per trillion (ppt) for PFOS and PFOA (and the sum of the PFOS and PFOA concentrations). PFOS and/or PFOA concentrations were detected in samples collected from all six downgradient monitoring wells. PFOS and/or PFOA concentrations in excess of the 70 ppt Health Advisory were identified in samples collected from three of the six downgradient monitoring wells (GZ-2, GZ-7S and GZ-8). None of the four upgradient/cross gradient wells contained PFOS/PFOA as concentrations in excess of the Health Advisory during either the January or June 2022 sampling rounds.

Results for the individual January and June monitoring rounds are discussed in greater detail below and the laboratory certificates of analysis are provided in Attachment B.



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January 2022 PFAS Results

January 2022 PFOS and/or PFOA concentrations in excess of the 70 ppt Health Advisory were identified three of the 10 monitoring wells sampled (GZ-2, GZ-7S and GZ-8). Combined PFOS and PFOA results ranged from 99.6 ng/L in the sample from GZ-7S to 196.6 ng/L in GZ-2 (ng/L = ppt). Nine of the 25 target PFAS compounds analyzed were detected in one or more of the samples. The concentration range of individual compounds may be found on the attached Table 1. Total PFAS concentrations ranged from non-detect in two sampling locations to 309.6 ng/L in the sample from well GZ-8.

June 2022 PFAS Results

The June 2022 combined PFOS and PFOA results ranged from a low of 6.9 ng/L in the sample from downgradient well GZ-9 to a maximum of 256.5 ng/L in the downgradient well sample from GZ-2. Individual compound detections were reported in all samples with results ranging from 1.96 ng/L to 130 ng/L (ng/L = ppt). Nine of the 25 target PFAS compounds analyzed were detected in one or more of the samples. Total PFAS concentrations ranged from Below Reporting Limit (BRL) to 329.3 ng/L.

PFAS concentrations were generally very similar between the two monitoring rounds with total reported PFAS concentrations somewhat higher in June 2022 for four (GZ-2, GZ-75, GZ-7D and GZ-9) of the 10 wells when compared to total PFAS concentrations in January 2022. Likewise, the combined PFOA and PFOS results in these same four monitoring wells were slightly higher in June 2022 compared to the January 2022 results. The largest variation reported was for the downgradient well GZ-7D which had a combined PFOA and PFOS result of 47.4 ng/L in January 2022 and a result of 58.3 ng/L in June 2022.

Quality Assurance/Quality Control

As part of RIDEMs QA/QC requirements, our Best Management Practices (BMPs), and the laboratory's requirements to maintain their National Environmental Laboratory Accreditation Conference (NELAC) certification, GZA and Eurofins prepared and analyzed a blind duplicate, field blank, equipment blank and laboratory method blanks concurrent with each round's samples. These samples were used to assess the potential for non-Site related or laboratory induced contamination. No PFAS were detected in the field or equipment blanks. No PFAS contamination was detected in the method blanks associated with these samples.

The laboratory also prepared laboratory control samples (LCS), laboratory control sample duplicates (LCSD) and evaluated surrogate recoveries during this round. LCS, LCSD and surrogate recoveries were within acceptable QC ranges for all samples with the minor exceptions noted in the attached laboratory report project narratives. All data were of suitable quality for the intended use.

FINDINGS AND CONCLUSION

The results from the January and June 2022 sampling indicate that PFAS are present in groundwater within onsite monitoring wells. Concentrations from three downgradient sampled locations were above the 70 ppt EPA health advisory. The highest detected concentrations were identified in samples collected from downgradient well GZ-2 during both monitoring rounds. In accordance with RIDEM's January 2021 letter request, GZA has conducted two rounds of monitoring, once during the approximate seasonal low time frame and once during the approximate seasonal high groundwater time frame.

This data indicates that concentrations of PFAS are generally elevated in downgradient wells across the Site with little contribution from off-Site/upgradient sources, and PFAS concentrations are not fluctuating to a meaningful degree on a seasonal basis.



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We trust this letter addresses your needs. If you have any questions or comments, or would like to discuss the study, please feel free to contact Ed or Erik at (401) 421-4140 or via email at edward.summerly@gza.com or erik.beloff@gza.com.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

Erik M. Beloff Project Manager

Richard A. Carlone, P.E. Consultant Reviewer

Edward A. Summerly, P.G. NY, KY

District Office Manager / Senior Principal

Cc:

Jean Lambert - Town of Jamestown

Attachments:

Table 1

Figure 1

Attachment A-Limitations

Attachment B-Laboratory Certificates

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