



Department of Environmental Protection

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November 13, 2020

Grant Opportunity

Round 2: Grants for Reimbursement or New Costs for Planning and Design of PFAS Treatment Systems in PFAS-Impacted Communities (Round 2 PFAS Treatment Grant)

GRANT OPPORTUNITY SUMMARY:

Proposals Sought: In late 2019 and early 2020, the Commonwealth of Massachusetts appropriated \$8.4 million to the Massachusetts Department of Environmental Protection (MassDEP) to address Per- and Polyfluoroalkyl Substances (PFAS) contamination in drinking water.^{1,2} In addition to funding MassDEP's statewide PFAS sampling program to determine the extent of PFAS contamination in public water supplies and private drinking water wells, **MassDEP has been authorized to offer grants to support the planning and design of systems for treatment of drinking water in PFAS-impacted communities. MassDEP has recently completed Round 1 of PFAS Treatment Grants (Round 1 or the First Round). MassDEP is pleased to offer a second round of grants with similar eligibility and goals as Round 1, which will be referred to as "Round 2" or "Round 2 PFAS Treatment Grant."** Round 2 changes from Round 1 are noted in this document. Round 2 is intended to continue addressing the same goals and eligibility from the First Round, with an additional emphasis on new needs that have been identified as MassDEP's Statewide PFAS Sampling Program and Round 1 of the PFAS Treatment Grants both move forward. **As was the case with Round 1, this Round 2 PFAS Treatment Grant also includes reimbursement for costs and expenses already incurred by impacted communities for the planning and design of treatment systems for PFAS.** For the purposes of this grant opportunity, "treatment" is any process that reduces the PFAS concentrations in a public water system. Examples of treatment include the systems that remove or reduce pollutants at a water treatment plant, connection to another water supply, and planning for development of a new well with water that can be used to blend with the affected water source to reduce the overall concentration of PFAS.

Overview and Goals: Per- and polyfluoroalkyl substances (PFAS) are a family of chemicals that have been used since the 1950s to manufacture stain-resistant, water-resistant, and non-stick products. PFAS are widely used in common consumer products as coatings, on food packaging, outdoor clothing, carpets, leather goods, ski and

¹ <https://malegislature.gov/Laws/SessionLaws/Acts/2020/Chapter31>

² <https://malegislature.gov/Laws/SessionLaws/Acts/2019/Chapter142>

snowboard waxes, and more. Certain types of firefighting foam—historically used by the U.S. military, local fire departments, and airports to fight oil and gasoline fires—contain PFAS.

PFAS in drinking water is an important and emerging contamination issue nationwide. Because PFAS are water soluble, over time PFAS from some firefighting foams, manufacturing sites, landfills, spills, air deposition from factories, and other releases can seep into surface soils. From there, PFAS can leach into groundwater or surface water, and can contaminate drinking water. PFAS have also been found in rivers, lakes, fish, and wildlife. PFAS chemicals are stable, stay in the environment for a long time, and do not break down easily. As a result, PFAS contaminants have been detected in soil, water, air, and food. Human PFAS exposure can occur when humans use certain products that contain PFAS, eat PFAS-contaminated food, or drink PFAS-contaminated water. When ingested, some PFAS chemicals can build up in the body and, over time, may increase to a level where health effects occur.

Studies indicate that exposure to sufficiently elevated levels of certain PFAS chemicals may cause a variety of health effects, including developmental problems in fetuses and infants, and effects on the thyroid, liver, kidneys, certain hormones, and the immune system. Scientists and regulators are still working to study and better understand the health risks posed by exposures to PFAS, and MassDEP is closely following developments in this burgeoning area.

On October 2, 2020, MassDEP promulgated new regulations to establish a Total PFAS drinking water Maximum Contaminant Level (MCL) of 20 ng/L, or parts per trillion (ppt) for a sum of six PFAS contaminants (“PFAS6”): perfluorooctanesulfonic acid (PFOS), perfluorooctanoic acid (PFOA), perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), perfluoroheptanoic acid (PFHpA), and perfluorodecanoic acid (PFDA). These regulations are consistent with the recently promulgated groundwater (GW-1) clean up standard in the Massachusetts Contingency Plan, 310 CMR 40.0000.

The goal of this program is to provide grant funds to PFAS6-impacted communities served by Community and Non-Transient Non Community (NTNC) MassDEP approved Public Water Systems, as defined in 310 CMR 22.02, whether under public or private ownership, for the costs of planning, conducting pilot studies, performing pump tests, engineering, and design work that

- eliminates or mitigates a public health risk from PFAS6 contamination of public drinking water while maintaining adequate capacity to meet demand, and
- is necessary to achieve or maintain a reliable and consistent level of PFAS6 (below 10 ppt) that is expected to ensure compliance with applicable drinking water quality standards for PFAS6. These grant funds are also available to reimburse PFAS6- affected communities that have already expended funds for this work.

Eligible Projects/Proposals: This program provides

- A. Grants for financial assistance for the preparation of plans and specifications for drinking water projects that remove PFAS6 contaminants to a level at or below 10 ppt, including planning, conducting pilot studies, performing pump tests, engineering and design activities, and permits. The proposed work activities do not need to be completed to be eligible for Round 2 funding, and project proposals that include both reimbursement for previously incurred costs as well as grant requests for future work activities are eligible. Any proposed reimbursement for expenditures made to date shall be documented in accordance with the requirements outlined in section B below.

- B. Reimbursement for some or all of the eligible work activities described above. Applicants should note that for a limited time (until June 30, 2021) opportunities for current and future PFAS6 laboratory analyses are being conducted by MassDEP under a separately funded initiative. ***Therefore, any proposed future PFAS6 laboratory analysis is not an eligible activity for funding under this grant.***

Examples of projects eligible for funding or reimbursement through this grant program include:

- Design of new and upgraded drinking water treatment facilities to remove PFAS6 contaminants;
- Design incorporation of any other drinking water treatment that would impact the functionality of PFAS6 removal systems (e.g., Mn and Fe removal as necessary to support PFAS6 treatment);
- Planning and design projects to replace PFAS6-contaminated drinking water source(s);
- Planning and design of projects that restore or maintain hydraulic capacity of systems that are impacted by closures of PFAS contaminated sources;
- Studies, surveys, or engineering focused upon development of new water sources that are necessary to restore system capacity because of PFAS-related impacts to the system;
- Engineering, design fees, and final designs to construct PFAS6 removal systems;
- Pilot studies to verify the most efficient means of achieving PFAS6 removal from a public water supply; and/or
- MassDEP Drinking Water Permits for the final design.

Examples of Ineligible activities or costs include:

- Purchase of water rights;
- Laboratory and sampling costs for new PFAS6 identification in drinking water (Applicants should take advantage of MassDEP's current no-cost laboratory analysis program);
- Other non-capital expenses relating to ongoing maintenance and treatment at drinking water facilities;
- Studies, surveys, or engineering focused upon development of new water sources that are not related to PFAS impacts to the system;
- Legal expenses associated with determining liability or addressing other legal matters;
- Administrative, contingency, and overhead charges in excess of 10% of the total grant/reimbursement award;
- Applications from Transient Non-Community Public Water Systems; and
- Construction of any kind, including but not limited to new sources or treatment systems.

Eligible entities: Community and Non-Transient Non Community (NTNC) MassDEP approved Public Water Systems as defined in 310 CMR 22.02, under public or private ownership. Eligible Entities should note the following with respect to availability of Round 2 funding:

1. **All PWS entities that did not apply for, and/or did not receive a grant or reimbursement award under Round 1 will be given first preference under Round 2:** MassDEP strongly encourages any PWS applicants who did not apply for Round 1 funding, and/or did not receive a grant or reimbursement award under Round 1, to submit a grant/reimbursement proposal under Round 2. **All applicants should note that, in Round 2, MassDEP will give first preference to any PWS which has not previously received funding under this Grant/Reimbursement program.**
2. **PWS entities that received a project grant or reimbursement under Round 1 may only apply for a distinctly different/separate project under Round 2:** Public water suppliers who previously received funding or reimbursement for a project under Round 1 are not eligible to receive additional grant or

reimbursement funding for the same project under Round 2. However, these PWS funding recipients can apply for a grant or reimbursement for a different/separate project for Round 2, provided the applicant supplies sufficient detail to establish that the Round 2 proposed project is distinctly separate from the previous Round 1 Grant/funding request. One example of a Round 2 project that is separate from a Round 1 project: In the Round 1 project, the PWS applied for and received reimbursement for engineering design costs for a PFAS6 removal system at a contaminated well. The PWS relies on several wells, and a separate PFAS6 removal system is necessary to treat a second well that will provide needed capacity for the overall system. In Round 2, the PWS is seeking a grant to design the treatment system for the second well. **MassDEP will give first preference to any PWS which has not previously received funding under this Grant/Reimbursement program. Therefore, the final total score of a Round 2 application submitted by a PWS that has previously received a grant or reimbursement award under Round 1 and has applied for funding for a distinctly different/separate project under Round 2 will be multiplied by 0.7.**

Application Deadline: Applications are due by 5:00 P.M. on Wednesday, December 30, 2020.

- A. **Page Limit:** Grant applications must not exceed fifteen (15) pages in length.
- B. **Funding Availability:** As was the case with Round 1, MassDEP anticipates that the typical grant/reimbursement award to any individual applicant under this Round 2 program will be up to a maximum of \$200,000 per applicant. However, in its discretion, MassDEP reserves the right to award individual Round 2 grants or reimbursements in excess of \$200,000 for proposals of exceptional merit, based upon the total number, quality, and quantity of the proposals received for the Round 2 funding opportunity. **The total potential funding available for all grant proposals/reimbursement requests through this program is up to \$3 million. Applicants should note that MassDEP reserves the right not to award the total funding currently available for this Round 2 program.** Applicants must only propose grant/reimbursement project proposals with timelines (for eligible reimbursable activities) that have been completed or (for eligible future activities) can be completed by June 30, 2021.
- C. **Match Requirement:** While applicants are not required to provide matching funds, a match is preferred. Applicants are encouraged to identify other known sources of funding for a proposed project on the Application Form, from both secured and anticipated sources.
- D. **Bidders' Conference:** Due to the Covid-19 emergency, no bidders' conference will be held. Applicants should send questions to program.director-dwp@mass.gov prior to the deadline for submission of questions, by or before 12 noon on Wednesday, November 25, 2020. Please use "Question, Round 2 PFAS Treatment Grant" in the subject line. All submitted Questions and MassDEP's official Answers will be posted on this website (<https://www.mass.gov/info-details/water-resources-grants-financial-assistance>) by 5 p.m. on Wednesday, December 9, 2020. See also Estimated Procurement Calendar below.
- E. **Total Anticipated Duration of Grant(s):** The contract duration will be through June 30, 2021.
- F. **Applicable Procurement Law:** Grants-- MGL c. 7A, § 7; St. 1986 c. 206, § 17; 815 CMR 2.00

INSTRUCTIONS FOR APPLICATION SUBMISSION (applicable to both grant proposals and reimbursement requests):

- A. **Evaluation Criteria (general):** Applicants must submit a completed application that includes all of the required supporting materials, agree to the program conditions, and meet the eligibility requirements, in order to be considered for a grant/reimbursement award. A MassDEP review committee (the “Grant Review Team”) will evaluate proposed projects based upon the criteria listed below. The review committee reserves the right to reject any or all proposals. Included in the initial review of eligibility for this Round 2 funding is an evaluation of whether the Applicant has previously received funding for a project in Round 1, and whether the application for Round 2 funding is for a project that is sufficiently separate and distinct from the Round 1 project.

Evaluation Criteria Components: Through its Grant Review Team, MassDEP will evaluate the proposed project’s public health and economic benefits. Specifically, the Department will look at how the proposed (or completed) project furthers the goal of supporting planning and design of PFAS6 treatment in public drinking water; how it will reduce PFAS6 contamination to 10 ppt or lower; how it protects the health of water users; and how well it ensures an effective and sustainable correction to PFAS6 contamination in the water supply.

The Grant Review Team will evaluate and score the grant/reimbursement applications from Eligible Entities (as defined previously in this Grant/Reimbursement Opportunity) based upon the following criteria. In addition to considering information submitted with this application by Wednesday, December 30, 2020, the Department will refer to other information it may have about PFAS6 contamination relative to the grant applications received. In its discretion, the Grant Review Team also will consult with MassDEP Drinking Water Program staff statewide. The Grant Review Team may consider any and all relevant information that becomes available through MassDEP’s Statewide Sampling Program or its Drinking Water Program activities, up to and including the date of MassDEP’s Grant Review Team final evaluation meeting.

MassDEP will give first preference to any PWS which has not previously received funding under this Grant/Reimbursement program. Therefore, the final total score of a Round 2 application submitted by a PWS that has previously received a grant or reimbursement award under Round 1 and has applied for funding for a distinctly different/separate project under Round 2 will be multiplied by 0.7.

Evaluation Criteria for reimbursement or new grant awards for planning and design work:

Project Description (25 points)

How well does the applicant describe the proposed or completed project and the work to be covered by this funding? How well does the applicant document the extent of the PFAS6 contamination problem? How does/will the work eliminate or mitigate a public health risk from PFAS6 contamination of drinking water? How does the work achieve or maintain PFAS6 concentrations below 10 ppt? In addition to the evaluation of the overall descriptive narrative, the following criteria will be applied:

Protect vulnerable populations (5 Points)

Up to 5 points will be given for proposed or completed projects from Public Water Suppliers in Environmental Justice communities (<https://www.mass.gov/info-details/environmental-justice-communities-in-massachusetts>) or that serve sensitive populations (infants and children, pregnant or nursing mothers). What is the percentage of PWS system users in each/either population?

Assist economically disadvantaged communities (maximum of 5 points)

The MassDEP review team will give preference to proposed or completed projects which provide support for economically disadvantaged communities with demonstrated PFAS6 levels above 10 ppt. in their finished water. Using the Massachusetts Clean Water Trust’s 2020 Affordability Calculation (<https://www.mass.gov/doc/affordability-calculation-2020iupalha>), the following points will be assigned to eligible communities for their assigned tier:

- Tier 3: 5 points
- Tier 2: 3 points
- Tier 1: 1 point

System Size (10 points)

What is the total number of water users who depend on the system for clean drinking water?

Large System (>50,000)	10 points
Medium System (>3300 – 49,999)	8 points
Small System (>500 -3299)	4 points
Very Small System (up to 500)	2 points

Extent of the PFAS6 contamination (20 points)

For systems with demonstrated PFAS6 levels in excess of 10 ppt in their finished water, how severe is the exceedance beyond 10 ppt? What is the PFAS level in raw water? What is the PFAS level from the entrance point to distribution system (where the water is representative of the water delivered to the consumers)? Maximum points will be given to systems that cannot consistently and reliably deliver drinking water at or below 10 ppt of PFAS6.

Project Budget/Financial Need (10 points)

How well does the applicant estimate and describe project costs? Does the applicant demonstrate a realistic understanding of project costs by providing a budget with detailed and credible cost estimates? For reimbursement requests, has the applicant provided sufficient supporting documentation to demonstrate that it has incurred and paid for costs and expenses associated with past PFAS6 planning, engineering, and design activities, and other related PFAS6 actions (including, for example, pump tests)? How extensive and available is any in-kind or monetary match that was/can be committed to the project? If the source of the PFAS6 contamination is a disposal site regulated by MassDEP’s Waste Site Cleanup program under 310 CMR 40.0000, the Massachusetts Contingency Plan, applicants must include a discussion of any financial relief being sought or provided by Potentially Responsible Party(s). Preference will be given to applicants that provide local matches, as opposed to outside financial contributions provided by Potentially Responsible Party(s).

Project Timeline (5 points)

Readiness to proceed is a significant factor. How well does the applicant specifically describe the timeline for the proposed work? Can the work feasibly be completed in accordance with the proposed timeline by June 30, 2021? If reimbursement is requested, has the work been completed and has it received MassDEP approval?

Project Benefit (20 points)

The MassDEP review team will award maximum points to projects with maximum urgency or community benefit; for example,

- Systems with demonstrated PFAS6 levels in excess of 20 ppt in their finished water with no options for blending;
- Systems with no options to immediately reduce the level of contamination;
- Systems whose hydraulic capacity is reduced due to loss or shutdown of contaminated sources;
- Projects that are highly cost effective: how many users will receive PFAS-free water per dollar of grant funding?
- What other community benefits were, or will be, realized as a result of the project?

B. Application Completion and Submission Instructions: All Grant and reimbursement applicants must complete the attached application form. Once the Application Form is complete, the document can be submitted electronically in Microsoft Word, or to reduce file size, the document may be converted and submitted as an Adobe PDF file.

Applications must be submitted electronically, via email to:

Yvette DePeiza, PFAS Treatment Grant Coordinator
Massachusetts Department of Environmental Protection
program.director-dwp@mass.gov
617-292-5857

In the subject line of the email, please write the applicant name and “PFAS Grant/Reimbursement Program Round 2.”

All applications must be received electronically by MassDEP by 5:00 P.M. on Wednesday, December 30, 2020. Applications received after the deadline will be rejected automatically. MassDEP reserves the right to reject any and all proposals or request additional information if needed.

Additional Required Documentation:

Additional Forms: If selected for a grant/reimbursement award, the applicant will be required to submit the following forms to complete the contracting process. Forms with an asterisk * need not be submitted, if they have been completed previously and are already on file with the Commonwealth:

- [Commonwealth Standard Contract Form](http://www.macomptroller.info/comptroller/docs/forms/contracts/StandardContractForm.docx), filled out and signed by the applicant
www.macomptroller.info/comptroller/docs/forms/contracts/StandardContractForm.docx
- [Commonwealth Terms and Conditions](http://www.macomptroller.info/comptroller/docs/forms/contracts/CommonwealthTermsAndConditions.pdf)
<http://www.macomptroller.info/comptroller/docs/forms/contracts/CommonwealthTermsAndConditions.pdf> These Terms and Conditions are incorporated by reference into the Standard Contract Form, and do not need to be executed separately.
- [Commonwealth W-9 tax information form](http://www.macomptroller.info/comptroller/docs/forms/vendorcustomer/newmass-w9.pdf) filled out and signed by the applicant with DUNS number and Federal Tax ID *
- <http://www.macomptroller.info/comptroller/docs/forms/vendorcustomer/newmass-w9.pdf>
- Completed Contractor Authorized Signatory Listing Form
<https://www.macomptroller.org/forms>
- Electronic Funds Transfer (EFT) form*
<http://www.macomptroller.info/comptroller/docs/forms/printable-document/eft-form.pdf>

Applicants are encouraged to review these forms prior to submission of an application.

**Please note that applicants may be asked to complete these forms again if the application is accepted.
ESTIMATED PROCUREMENT CALENDAR FOR ROUND 2 PFAS TREATMENT GRANT/REIMBURSEMENT APPLICATION/AWARD:**

Procurement Activity	Date	Time
Notice of Grant/Reimbursement Opportunity (posted on COMMBUYS And MassDEP website)	Friday, November 13, 2020	
Bid Release Date (Posting Date) on MassDEP website (https://www.mass.gov/info-details/water-resources-grants-financial-assistance)	Friday, November 13, 2020	
Deadline for Submission of Questions to MassDEP (prior to deadline, via email, to): program.director-dwp@mass.gov	Wednesday, November 25, 2020	12 noon
Official Answers for Q&A published on MassDEP website (estimated),(https://www.mass.gov/info-details/water-resources-grants-financial-assistance)	Wednesday, December 9, 2020	5 P.M.
<u>GRANT/REIMBURSEMENT APPLICATION DEADLINE; ELECTRONIC SUBMISSION TO</u> program.director-dwp@mass.gov	Wednesday, December 30, 2020	5 P.M.
Notification of Grant/Reimbursement Award(s) (Estimated) (POSTED ON COMMBUYS AND MASSDEP WEBSITE, https://www.mass.gov/info-details/water-resources-grants-financial-assistance)	Friday, February 5, 2021	
Estimated Contract Start Date	Friday, March 5, 2021	

ATTACHMENT A
Application Form

Round 2 Grants for Reimbursement or New Costs for Planning and Design of PFAS Treatment Systems in PFAS-Impacted Communities (PFAS Treatment Grant)

Round 2 Grant/Reimbursement Program Application

Overview: The Massachusetts Department of Environmental Protection (MassDEP) is seeking proposals from public or private MassDEP approved Community or Non-Transient Non-Community Public Water Systems (PWSs) that are impacted by PFAS6 contamination. The purpose of this funding is to provide grant funds and/or reimbursements to support new or completed planning and design of treatment facilities to address PFAS6 contamination. Only projects that meet the specific requirements of the PFAS6 program outlined in this Round 2 Grant/Reimbursement Opportunity will be considered for funding.

PLEASE COMPLETE THIS PAGE AND INCLUDE IT WITH YOUR RESPONSE

Applicant Information (NOTE: Applicant must be authorized by the specified organization to submit this application and commit to the proposed project).

Applicant Name: _____

PWS registration number: _____

Type of system: COM NTNC Public Private

Affected Community: _____ Number of users: _____

Applicant's project manager: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Grant Request:

Amount of Reimbursement Request: \$ _____

Amount of New Work Request: \$ _____

Amount of Match Provided (optional): \$ _____

Is this a resubmittal of a Round 1 application that did not receive funding? (Y/N)

Did the Applicant receive Round 1 Funding? (Y/N): if Yes, then indicate the Round 1 proposal/project submitted, and describe (in Project Description below) how the Round 2 proposed project is separate/distinct from the Round 1 project.

PLEASE ADDRESS EACH OF THE FOLLOWING SECTIONS: (15 pages or less)

Section 1: Eligibility/Ability to Perform Proposed project

Eligibility/Ability to Use Funds: Please describe the applicant's eligibility for an award of this PFAS Treatment Grant (including reimbursement requests). If awarded a PFAS Treatment Grant, the awardee must be able to enter into a contract with MassDEP within 60 days of award. Please discuss the applicant's ability to enter into the contract and perform the project or provide the required materials supporting a request for reimbursement. The applicant must address all specific steps that must be completed in order to accept a state grant. Please identify any potential constraints.

Section 2: Application

Consistent with the Evaluation Criteria outlined above (pages 4-6), address the following:

- a. **Project Description:** Following the evaluation criteria described above in this Round 2 PFAS Treatment Grant Opportunity, describe the proposed project and the proposed work to be covered by this funding. For reimbursement requests, please describe the completed project and all related project activities that are the basis for the reimbursement request. This description includes proposed (or completed) project tasks, personnel, and desired (or completed) outcome(s) for the project, and includes an inventory/listing of the documentation for future project plans and all related activities, or supporting documentation materials for reimbursement requests for completed projects that will be provided as part of the application.
- b. **Describe the affected population:** Does the project provide drinking water for an Environmental Justice community or sensitive population? What percentage of the water users fall into each of these categories?
- c. **Community Economic Profile:** Does the community qualify as Economically Disadvantaged, consistent with the Massachusetts Clean Water Trust Affordability Calculation (<https://www.mass.gov/doc/affordability-calculation-2020iupalpha>) ?
- d. **System size:** Describe and quantify the number of users that rely on the affected water supply.
- e. **Financial Need:** Explain the need for financial assistance to implement the proposed project, including other anticipated or secured funding sources that did/will support portions of the project. For reimbursement requests, please provide the same explanation regarding the need for financial assistance, and whether there are other funding sources to support payment of portions of the completed project. Applicants who received an award under Round 1 PFAS Treatment Grant Program should specify the amount of the prior Round 1 award.
- f. **Extent of PFAS contamination:** Discuss the extent of PFAS 6 contamination in the system, including contamination found in raw and finished water, from samples collected from the entrance point to the distribution system. Include a discussion of any sources that have been taken off-line and/or any other system impacts from PFAS6 contamination in finished water.
- g. **Project Budget:** Detail the costs associated with the proposed project or reimbursement request. Applicants must demonstrate a realistic understanding of project costs by providing a

budget with detailed and credible cost estimates. Discuss the cost efficiencies to be realized by the proposed project. What is the per-user value of the proposed work? For any in-kind or monetary match, explain how extensive the match will be and how it will be made available to the project, or document whether a match was already applied to the completed project. Please identify the source of any match, including (but not limited to) whether a Potentially Responsible Party may provide, or has provided, any financial contribution to the project.

- h. Project Timeline:** For new work, describe the timeline for the work proposed, including a commitment to achieving final completion by the deadline of June 30, 2021. Explain how the work can be feasibly completed by June 30, 2021.

- i. Project Benefit:** Use this section to describe any other aspects of the project that make it important to receive funding. For planning and design work, provide information about benefits of the completed or proposed project, and specifically address how the project furthers the goal of removing PFAS6 contamination from the public water supply. In addition to addressing the public health benefits of safe drinking water, does the project restore hydraulic capacity to ensure system redundancy, firefighting capability, or economic growth that were/are adversely impacted by PFAS6 contamination?