

C-0838  
October 17, 2016

Mr. Mark Baldi  
Massachusetts DEP  
8 New Bond Street  
Worcester, MA 01501

**Re: Residential Well Sampling Results Notification Requirements  
H. Foote Road, Charlton  
RTN 2-19678**

Dear Mr. Baldi:

On behalf of Southbridge Recycling & Disposal Park, Inc. (SRDP) and the Town of Southbridge (Town),<sup>1</sup> Tighe & Bond, Inc. has prepared this letter to request that the Massachusetts Department of Environmental Protection (MassDEP) approve a revision to the notification requirements associated with the monthly/quarterly residential well sampling program at the H. Foote Road Site Area.

The IRA Conditional Approval (dated January 12, 2016) stipulates that detections of contaminants in any private drinking water well be communicated to the affected resident, the Southbridge and Charlton Boards of Health, and MassDEP, within 24 hours, in addition to the public notification requirements of 310 CMR 40.1403(10). With the increase in monthly sampling locations, it is very time-consuming and inefficient to provide verbal notification within 24 hours of gaining knowledge of a detection of contaminants, and written notification within 30 days of receipt of the laboratory results. Therefore, in accordance with 310 CMR 40.1403(10)(d), we propose the option of providing these notifications by email for those residents who choose that option. Prior to instituting any changes to the current notification requirements, we would obtain the permission of the property owner (in writing) to revise the notifications from verbal and/or written to electronic. If the property owner selects this option, we would provide the notification of detections of contaminants within 24 hours to the affected resident, the Boards of Health, and MassDEP in an email with a delivery receipt requested. In addition, within 30 days of receipt of the laboratory results, an electronic copy of the laboratory results will be provided to the affected resident along with a summary of the results and a comparison to applicable Massachusetts Contingency Plan (MCP) GW-1 standards and Massachusetts Drinking Water Standards.

It is our opinion that the proposed email notification system would be more efficient and manageable than the verbal/written procedure currently being performed at the H. Foote Road Site. Further, the delivery receipt would confirm that the email was sent to a valid email address, and received, and the affected resident can retain the notification for their future reference. If an affected resident does not agree to the email notification process, we will continue to provide that resident with verbal and written notifications, as is currently applicable.

In addition, we are requesting clarification to the notification requirements as it applies to homes with POET systems. We request that MassDEP confirm that the 24-hour notification

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<sup>1</sup> SRDP and the Town are identified as "Non-Specified Potentially Responsible Party (PRP)" for Immediate Response Action (IRA) activities associated with the response to detections of volatile organic compounds (VOCs) or 1,4-dioxane detected in residential wells located on H. Foote Road in Charlton (Release Tracking Number [RTN] 2-19678).



requirement only applies to midfluent or effluent samples. There should not be a requirement to urgently notify homeowners and others of a condition that they already understand exists, and for which the POET system is mitigating the risk

It is our hope that these requested revisions to the notification procedures are acceptable to the Department, and will help provide clarity to residents within the Site. If you would like to discuss the details of our alternative notification procedure, please feel free to contact me at (413) 572-3227.

Very truly yours,

**TIGHE & BOND, INC.**



Jeffrey L. Arps, LSP  
Director, Remediation & Field Services

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