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Date: June 16, 2004
To: Wayne Davies, Hopkinton Board of Appeals
From: Jesse Schwalbaum, Earth Tech
CC: Nancy Peters, Hopkinton Board of Health
Dick Jubinville, Earth Tech

Subject: DRAFT Recommendations for Long Term Monitoring Plans and Permit Conditions Relative to the Hopkinton and Westborough Landfills

Earth Tech has been working with consultants for E.L. Harvey and Sons (Harvey) and the Department of Environmental Protection (DEP) to finalize long term monitoring plans for both the former Hopkinton Landfill and the old Westborough Landfills (a portion of which is Hopkinton). It is our understanding that continued monitoring of these landfills will be a condition of the permit issued by Board of Appeals for the proposed Materials Recovery and Recycling (MRRF) Facility proposed for the property.

The long term monitoring plan for the former Hopkinton landfill was prepared by Brown & Caldwell, reviewed by DEP, Earth Tech and others and is near final approval. It is our opinion that the long term monitoring plan, as amended by Brown & Caldwell in their letter of June 3, 2004 is adequate and should be incorporated into the conditions of the special permit along with the following clarifications:

- 1) Prior to any further sampling of the bedrock wells (MW-1B, MW-2B, MW-4B and MW-7B), the proponent needs to demonstrate that with prolonged pumping the pH of water samples obtained from these wells has stabilized beyond a reasonable doubt. If this condition cannot be demonstrated, the wells should be properly abandoned and replaced with properly constructed monitoring wells.
- 2) All water quality results and field notes for each sampling round should be provided to the Board of Health in a timely fashion.
- 3) This monitoring plan should not be revised without approval from the Board of Health.
- 4) This monitoring plan should remain in place for a period of 30 years (2034) unless a shorter term is approved by both the DEP and the Hopkinton Board of Health.

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To the best of my knowledge, there currently is no formal long term monitoring plan for the Westborough landfills. The monitoring plan that is currently being implemented is apparently an interim plan. The long term plan will be developed after four quarters of monitoring is completed. For the purposes of the special permit, the interim monitoring plan, as modified in our memorandum of June 14, 2004, could be adopted until the final long term monitoring plan is approved by both DEP and the Hopkinton Board of Health. However, the proponent's responsibilities with respect to groundwater monitoring would be clearer if the original April 2004 "Old Westborough Sanitary Landfills Groundwater Monitoring/Assessment Scope of Work" were revised to incorporate the actual monitoring well installations and the recommendations included in Earth Tech's June 14, 2004 memorandum.

As with the monitoring plan for the former Hopkinton Landfill, this monitoring plan should include the provisions for: 1) providing data and field notes to the Board of Health, 2) approval from the Board of Health for any changes in the plan and 3) a term of 30 years.