



CLEAN WATER ACTION

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June 14, 2005

Attn: Wayne Davies
Chairman
Hopkinton Board of Appeals

Dear Mr. Davies,

Clean Water Action is very concerned with the impact of the proposed Trash Transfer Station by E.L. Harvey & Sons on drinking water supplies in Hopkinton. To date seven special permits have been sought to allow for this Trash Transfer Station. The towns of Hopkinton and Westborough both have model Aquifer Protection Districts, also known as Water Resource Overlay Protection Districts that prohibit adverse land uses such as Trash Transfer Stations to protect water supplies. So many special permits are necessary in this case because this proposed facility clearly doesn't belong in a water recharge area. It is not in the best interest for the citizens of Hopkinton to allow a facility in a Zone II recharge area that poses a threat to town wells.

The proposed 100,000 square foot facility will fall entirely within the Water Resources Protection Overlay District. The amount of impervious surface will have an impact on both the quality and quantity of water that will be recharged into the town's aquifer. Serious questions remain unanswered on the extent of Zone II recharge area and how Hopkinton's Zone II stops at the MA Turnpike. The memoranda by Lightship Engineering indicate serious flaws with Earth Tech's Zone II delineations, specifically the "no flow" zone between the landfill and the town's public wells is not corroborated by existing United States Geological Survey data.

Groundwater monitoring conducted near the Hopkinton landfill poses yet another reason for concern. Numerous contaminants, including 1,4 Dioxane at levels of 600 and 750 ppb, have been found from groundwater monitoring. The potential impacts on the surrounding ecological system and whether these contaminants will migrate beyond the site are both unknown. This should be cause for concern for not only private well owners living as close as 252 feet away, but also for those concerned with the integrity of public water supplies. The

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Board of Health, not the Zoning Board of Appeals, should continue overseeing groundwater monitoring since they have specific enforcement authority.

It is important to consider why Hopkinton and Westborough both have Water Resource Overlay Protection Districts. Each town was concerned about drinking water protection and passed a local zoning bylaw that matched the MA Department of Environmental Protection's model drinking water zoning bylaw. Numerous communities throughout the state have passed these stringent bylaws to protect water supplies from future contamination. Following these bylaws, not allowing numerous exceptions, is critical because once a water supply has been contaminated it's often cost prohibitive to perform cleanup and communities are then forced to buy water from other towns at higher cost. The MA DEP didn't intend for various boards at the local level to circumvent these bylaws once they were passed.

Sincerely,

Michael Davis
Drinking Water Advocate
Clean Water Action