



ABINGTON & ROCKLAND JOINT WATER WORKS

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August 8, 2023

Rockland Zoning Board of Appeals
Town Hall
242 Union Street
Rockland, MA 02370

RE: Shinglemill Apartments

0 Pond Street and 152 Wilson Street, Rockland, MA

Coneco Comments Dated July 14, 2023 in Response to

Abington Rockland Joint Water Works Comments 5/30/23 & 5/31/23

Based on

Members of the Rockland Zoning Board of Appeals

I am writing on behalf of the Abington Rockland Joint Water Works (ARJWW) to continue to express our concern regarding the potential negative impacts of the proposed Shingle Mill project. We have reviewed the above referenced comments prepared by Coneco, dated July 14, 2023, and offer the following responses:

1. The response prepared by Coneco does not adequately address our concern. The plans show numerous groundwater recharge basins for stormwater recharge. Appendix D of the Stormwater Management Report (Proposed Long Term Pollution Prevention Plan) indicates "Good Housekeeping Practices, Provisions for Storing Materials and Waste Products Inside and Under Cover, and Vehicle Washing Controls". However, these brief standard operating procedures do not effectively guarantee that liquid wastes from vehicles (antifreeze, oils, brake fluids, transmission fluids) will not accumulate on the asphalt in parking areas and be washed into the stormwater system during storm events. The noted Long Term Pollution Prevention Plan SOPs are insufficient regarding actual details for how any vehicle maintenance, vehicle washing/cleaning, and spills of liquid wastes will be monitored, policed, managed, and/or prohibited as required within a Zone A. Liquid wastes from future potential vehicle maintenance and vehicle parking/storage pose a significant threat to the quality of the water supply. More robust details on prohibiting and preventing any potential for liquid wastes from motorized vehicles to enter the stormwater management system need to be provided. Please provide details

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how the proposed stormwater treatment and management systems will remove soluble hydrocarbons, glycol, and other toxic chemicals found in engine oil, brake fluid, transmission fluid, engine coolant, and gasoline.

2. Neither sodium chloride nor calcium chloride are favorable chemical compounds for drinking water quality. The addition of chloride to drinking water can be deleterious to the ability to effectively treat the water and provide sufficient corrosion control for compliance with the Lead and Copper Rule or Revised Lead and Copper Rule. The groundwater infiltration basins and the overflow for these basins are located to within a few mere feet of the Zone A boundary for the Hingham Street Reservoir. It is a disparaging to practical civil engineering design and practice to propose to the Town that there will be no negative impacts associated with the proposed groundwater infiltration and recharge systems on the Hingham Street Reservoir. Why is there an overflow to the groundwater infiltration system and why is the overflow (and splash pool) within a few feet of the Zone A boundary? Can you please provide details (plan sheet) of the proposed snow storage overburden. If melting snow will flow into the Zone A, then it should not include any deicing chemicals.
3. Please provide answers to the questions asked in paragraph 2 regarding the underground infiltration chambers.

Why is there an overflow to the groundwater infiltration system and why is the overflow (and splash pool) within a few feet of the Zone A boundary?

4. In our opinion the project should not be approved unless and until the site has a DEP approved drinking water supply and DEP approved sanitary sewer plan. Coneco's response did not address Abington/Rockland Joint Water Works' concern: It is our understanding that the project proponent is planning to test and permit the use of on-site groundwater supply wells. Based on the proximity to the Abington/Rockland Joint Water Works water supply reservoir, we are concerned that any groundwater withdrawals will reduce the safe yield of our surface water supply. Therefore, if on-site wells are planning to be used, we request that the project proponent complete groundwater modeling and/or Firm Yield Estimator calculations which demonstrate that there will be no negative impacts or reductions in the Safe Yield of the Hingham Street water supply reservoir.
5. The Stormwater Management Report does not include hydrologic study/model of the proposed development to demonstrate that the fate and transport of potential contaminants generated from the development do not pose a threat to the public water supply. The Stormwater Management Report only considers stormwater standards and sizing. It does not indicate consider the transport of pollutants to the adjacent Zone A. In addition, the proposed Stormceptor models being proposed only consider TSS and not hydrocarbons or any other soluble contaminants from automobiles or snow deicing chemicals.

Comments from May 31, 2023

1. The storage of waste within a Zone A should not be allowed. The proposed stormwater management systems do not address liquid or soluble toxic or hazardous wastes, only

total suspended solids. To state that the proposed stormwater management systems will provide the removal and containment of many pollutants is misleading. The proposed Stormceptor calculations provided in the Stormwater Management Plan only indicate the removal of total suspended solids (TSS) and not soluble hydrocarbons or other contaminants that can be found in parking lots. What are the specific means and methods to ensure that the dumpsters are not used for the disposal of household hazardous and personal care products? Liquid wastes and/or stormwater entering the dumpsters have the potential to contaminate the adjacent Hingham Street Water Supply Reservoir.

2. The following questions were not adequately addressed:
 - c. The response does not address our comment. Any future pump test for the proposed on-site wells should include comprehensive testing and groundwater modeling to clearly demonstrate that there are no negative impacts or reductions to the Safe Yield of the Hingham Street Water Supply Reservoir. If the Zone Board does not include this requirement in any future determination, then the Abington/Rockland Joint Water Works will forward this comment to the Massachusetts Department of Environmental Protection. In addition, due to the proximity of proposed groundwater supply wells to the Hingham Street Water Supply Reservoir, the project proponent should consider the need and space required for the potential treatment of Per- and Polyfluoroalkyl Substances (PFAS). PFAS sampling should be included in any future pump test.
 - d. Without showing the location of the proposed wells on the project plans it can not be ascertained if the entire Zone 1 will be owned and controlled by the land owner and that only activities related to the production of drinking water are proposed within the future potential Zone 1. The required Zone 1 radius for a well that produces 34,555 gallons per day is approximately 331 feet.

In our opinion our comments and concerns have not been adequately addressed, and therefore, we are not in favor of the ZBA approving this project until our questions and concerns have been adequately addressed, or granting any waivers for this project as the proposed project represents a secondary threat to one of the Town's most precious resources. From a volume perspective, we are in the process of evaluating the ability of our system to support this project with public drinking water while maintaining service to our existing customers and staying in compliance with our Water Management Act withdrawal permit.

Please feel free to contact me at (781) 878-0901 if you have any questions or require additional information. I can also be reached via e-mail at KCameron@abrockwater.com.

Very Truly Yours,
Abington Rockland Joint Water Works


Kristel Cameron
Superintendent