



# Town of Sturbridge — Board of Health

Linda Cocalis — Chair; John Degnan — Vice Chair; Robert Audet — Clerk



**Public Health**  
Prevent. Promote. Protect.

Ms. D. Lynne Welsh, Acting Section Chief  
Solid Waste Management Program  
MassDEP – Central Regional Office  
627 Main Street  
Worcester, MA 01608  
January 20, 2012

*Sent via fax and email*

**RE: Comments on Issuance of Provisional Permit  
CERO-SWM - Minor modification waste reallocation  
Transmittal Number: X239694 (Waste Volume Increase)**

On behalf of the Sturbridge Board of Health, the following comments are offered regarding the provisional permit of the Southbridge Landfill, issued on December 9, 2011. These concerns are being submitted pursuant to 310 CMR 19.000, as allowing the change of C & D to primarily all MSW may cause a severe adverse impact.

### ***Southbridge landfill Within Airport Zone***

The Southbridge Airport receives federal grants and has grant assurances that would impact the airport. In addition, the Southbridge landfill is located within an airport zone, and it is required to be permitted with further evaluation by the Federal Aviation Administration (FAA). Therefore, according to the FAA, the applicant must file Form 7460 which ensures the allocation amount of putrescible waste and/or file with the FAA as soon as they expect any increase above the current permit allocation. Therefore, unless a Bird Management Plan has been conducted and studied by a wildlife biologist, and subsequently approved by the FAA, it is not acceptable.

Our understanding is that the current plan is to conduct bird harassment from the landfill onto adjacent property, which may have a detrimental effect on the airport and also, potentially life-threatening impact on surrounding communities. For additional information, please see FAA Hazardous Wildlife Attractants on or Near Airports Advisory Circular AC NO: 150/5200-34A dated Jan. 26, 2006. According to this Circular, the increase in putrescible waste will be a wildlife hazard.

Therefore, we question if the DEP has verified that the applicant has complied with this FAA condition. If not, this provisional permit must be denied in order to protect health, safety, and the environment.

### ***Airport Restaurant Public Water Supply***

The Southbridge Airport commission held a public meeting on May 6<sup>th</sup> 2010 and confirmed that the restaurant's well at the airport has been determined by the DEP to be a public water supply. The restaurant is within 1,000 feet of the landfill. This well was in existence prior to the application in 2007, as well as the decision of the Southbridge Board of Health in 2008. As you will note, it was only this month that the DEP made this determination; if this was revealed in the MEPA or the EIR determination, closer scrutiny may have caused a more detailed review. Has the applicant provided this information to the DEP?

### ***Air Quality Impact and Other Surrounding Sources***

The Air Quality Impact of all other sources within one mile has not been taken into consideration. Millennium Power Plant in Charlton, MA is within one mile and has not been taken into account as facilities that impact air quality; this can be an adverse impact on residents in some of the surrounding communities which already have a very high asthma rate. Children and older adults are the most prone to such a condition and this will adversely impact them. Considering the amount of new pollution as defined in 310 CMR 19.000, this will result in an adverse impact to human, plant, animal life, and property, or may unreasonably interfere with the comfortable enjoyment of life and/or property.

### ***Traffic Impact***

As stated above, the current traffic route is currently through Sturbridge. This increase in truck traffic is a safety, air quality, and environmental concern, specifically as it relates to the increase of diesel particular matter emitted into the Sturbridge residential areas. The only traffic study previously performed was on the currently used route through Sturbridge, which only took into consideration the current operational hours and limited Saturday traffic.

The planned new truck route (Route 169) to the proposed Industrial Park Access road has not had a traffic study performed, which was a requirement of the 2008 Minor Modification Hearing. Therefore, the DEP should request a new study be completed, since the location and various impacts will be different.

### ***Water Impact on Private Wells and the Aquifer***

Sturbridge continues to have concerns regarding contamination of its drinking water supplies and thus, its residential wells and aquifer. In the event of contamination to residential wells, the only

viable solution would be for affected residents to receive water from the town's water resource, which is an aquifer. The aquifer could become contaminated as was the case of Charlton and the MA Pike. Sturbridge's environmental engineers reviewed the monitoring plan and were not comfortable or assured that the number of monitoring wells surrounding the landfill sufficiently protects the Town of Sturbridge's water resources.

The Southbridge Landfill Test Wells continue to exceed the EPA limitations for chromium in multiple wells. Chromium is considered by the EPA as a factor for cancer in humans and a hazard for aquatic life in contaminated water. One particular groundwater monitoring well, SO-1, has been reported for the past year and more and in the last four quarterly reports to the DEP, as blocked and unable to have testing done. We would like to request that this well, SO-1 be properly replaced prior to approving the new provisional permit.

This reference to well number SO-1 continues to be the same cut and paste language from previous reports that indicate it would be scheduled for replacement prior to the next scheduled well test report. This has not been done to our knowledge and we can only rely on the last report dated November 2011 which states that well SO-1 still needs to be replaced. In the past, the November 2009 report stated that the then-working well #SO-1, indicated exceedences for chromium and lead. Therefore, it is imperative that the well located at #SO-1 be replaced and put back into proper operation for testing.

The blocked SO-1 well is also within 1,200 feet to the SO-2 well that has consistently reported Chromium over allowable EPA levels. In addition to these concerns, the wells also are surrounded by vegetated wetlands that flow directly toward Sturbridge and the border of Charlton. This citation regarding the direction of water flow is based on evidence brought up by the engineers hired by the permit holder during the landfill hearings in 2008.

***Guidance for Conducting Facility Impact Assessment for Solid Waste Facility Site Assignment, as Revised on March 22, 2006, Section 4.3.2: Incompatible Land Use***

Please note that per the above reference, the surrounding facility for MSW has:

- a. An airport less than 1,000 feet from the landfill
- b. Agricultural land less than 2,000 feet from the landfill
- c. Conservation land less than 2,000 feet from the landfill
- d. Other point sources in the area regulated by Mass DEP (Millennium Power Plant)  
Charlton, MA
- e. Land use around facility (Proposed Industrial Park) has an additional point source.

- f. Public Parks and Recreation (Department of Fish and Wildlife's McKinstry Brook WMA)
- g. Town of Southbridge Public Water Supply and watershed is less than two miles away; potential impact includes birds contaminating the drinking water supply to Southbridge and surrounding water supplies within 50 miles (Quabbin and Wachusett Reservoirs).

Unless all of the above has been taken into consideration, the Sturbridge Board of Health believes there will be an adverse impact.

#### ***Filing for Minor Modification Under Q. Compliance with Additional Conditions***

##### ***1) Adequate Noise and Odor Control***

Over the last two years, the Sturbridge Board of Health has received several odor complaints, of which the DEP was notified. With an increase in the MSW provisional permit to this facility, we anticipate more odor complaints to our office.

##### ***2) Adequate Vector, Bird and Gull Control***

Based on the current Bird Management Plan (BMP), Sturbridge believes that the plan will not adequately deflect birds from being attracted to the landfill given the increase in MSW. The BMP must protect the safety of the airport, and neighboring communities around the airport, from potential lethal interaction with birds. The BMP must also ensure that the environmental concerns of birds are addressed in order to protect water resources from contamination due to increases in bird populations as expected with more putrescible waste.

#### ***Geographic (out-of-state) waste stream – Compliance Issues***

Regarding the Massachusetts Solid Waste Master Plan proposal for eliminating organics from the waste stream, it is unlikely that compliance would be met on the Southbridge Landfill waste which is transported from different states that would do not have this regulation. It questioned how would the DEP and the permit holder monitor and certify the waste stream as meeting the proposed Massachusetts waste ban regulation on organics?

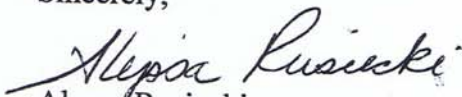
#### ***Minor Modification – Major Impact***

While this increase may be considered a minor modification, allowing such changes in MSW will have major adverse impacts on the health, safety and environmental conditions in

Sturbridge, Southbridge, and Charlton. The Sturbridge Board of Health would like to point out comments made by the Sturbridge Town Administrator, Shaun Suhoski, (dated January 11, 2012) on behalf of Selectman – and we concur with those comments as well.

Thank you for the opportunity to comment on this matter.

Sincerely,



Alyssa Rusiecki  
Sturbridge Board of Health Agent  
on behalf of the Sturbridge Board of Health

Cc: File  
Sturbridge Town Administrator, Shaun Suhoski  
Sturbridge Board of Selectmen  
Representative Todd Smola  
Senator Stephen Brewer

FAXED TO: DEP/CERO 508-792-7621  
EMAILED TO: [Lynne.Welsh@State.MA.US](mailto:Lynne.Welsh@State.MA.US)  
[MDEP.CentralRegion@State.MA.US](mailto:MDEP.CentralRegion@State.MA.US)