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JOINT COMMITTEE ON ENVIRONMENT AND

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—
DISTRICT OFFICE

225 MAIN STREET, ROOM 219A

MARLBOROUGH, MA 01752

Mr. Thomas Lineer, BRAC Program Manager
Army Environmental Division
Installation Service Directorate

Dear Mr. Lineer,

I would like to express my support for PACE's concerns regarding the Army's proposed reclassification of the groundwater surrounding SHL from GW-1 to non-potential drinking water source area. Along with the members of PACE, I oppose this reclassification. I also concur with the objections made by Ms. Diane M. Baxter, MassDEP Bureau of Waste Site Cleanup in her Jan. 30, 2024 letter to Mr. Thomas Lineer, BRAC Program Manger.

The Army's rationalization to exempt the SHL from meeting GW-1 standards appears to be based on their own determination of arsenic background levels. This FFS mentions a cleanup level of arsenic of 198 ug/L rather than drinking water standard of 10 ug/L. This would clearly not meet the ARAR or RAO established by the MaDEP, as detailed in Ms. Baxter's letter.

The long-term impacts regarding these high levels of arsenic must be considered. To date, there are at least 25+ years of high levels of arsenic precipitating out as it mixes with oxygenated groundwater in a relatively small area, north of the landfill, in Ayer. The wetland areas leading to Nonacoicus Brook are most likely impacted by the accumulation of arsenic that is being absorbed by small organisms, and thus passed on to local wildlife. Treatment will likely need to continue over a very long time. As a result, it seems likely that the arsenic will travel towards the MacPherson Wells and other potential drinking sources.

I implore you to take these considerations into account and prioritize access to safe drinking water for Ayer residents. Thank you for your time.

Sincerely,

Jamie Eldridge

State Senator

Middlesex & Worcester