

1351 West Street  
Wrentham, MA 02093

23 January 2023

Wrentham Conservation Commission  
79 South Street  
Wrentham, MA 02093

RE: Sheldon Meadow and Sheldon West (20 Hancock Street and 1139 West Street)

By email: [concom@wrentham.gov](mailto:concom@wrentham.gov)

Dear Chairman Immonen and Conservation Committee members;

I am writing regarding the concern of myself and my wife, Susan, on the referenced proposed cluster development in Sheldonville. We have lived at 1351 West Street for the past 25 years and moved to Wrentham from Franklin in 1998 because of the rural character of Wrentham. All the comments in this letter are in response to the statements made at the Conservation Commission Meeting on 1/12/23. To my background, I have four decades of professional full-time employment in the minerals mining industry and specifically towards supply of snow and ice control mined materials.

There are well documented concerns from both the Providence Water Supply Board, the Wrentham Planning Board, and the Wrentham Conservation Commission as well as citizens who are following these proposed cluster developments under the SLC by-law. My concerns with this letter are the assurances by the proponent, through their attorney, that the proposed fill would be either "virgin material" from a sand and gravel mining operation or "Other sources" of imported soil.

Ms. Enright, engineer for the applicant, stated that virgin material from a sand pit "is being mined and a certification statement indicating such from each source provider". That does not resolve the validity of acceptable clean fill as a statement is not a certificate of compliance and/or a certificate of analysis. The applicant wants to have a blanket acceptance of fill coming from what *they* identify as virgin material.

In the January 1963 issue of Popular Science magazine, they published an article on methods for disposal of used motor oil into a gravel filled hole in your yard, advising that it would be absorbed by the next oil change. Where do they think that material went? To that end, ConComm Chairman Immonen voiced his own experience of accepting "clean fill" that was not clean and caused problems, so this is not rare and not uncommon by any means.

It is very common to encounter veins of contamination in *any* mined material. In fact, it's expected. In the chemical industry where I am employed for the past 48 years, we test all materials mined to the same standard and suggestions that we need only worry about "other sources" of fill is a false security. All fill should be tested and certified by a statement from a 3<sup>rd</sup> party approved certifier.

We can cite multiple problems with mined "virgin" material contamination, in the Commonwealth, where contaminants in the "virgin" material were environmentally problematic. This is the very nature

of mining whether virgin or reclaimed materials; *everything needs to be tested and certified* carefully to ensure that we are not introducing contaminants into the area and moreover, the water resource district for PWSB and the Town of Wrentham.

Ms. Enright, engineer for the applicant, when asked if the S-1 Residential standard is appropriate for this site and location, stated that “she was told by a person who works with fill that the S-1 residential standard is appropriate for a water resource district” Typically, engineers do not take critical decision on hearsay so a definitive statement on this topic is needed. She further stated that a soil manifest would accompany non-virgin material, but, in my professional experience, these standards of testing need to be in place for all fill sources entering this water protection zone. The attorney for the applicant wants to position that these tests are unreasonable and “we can debate how many angels stand on the head of a pin”, whatever that means, but goes on to try to put the testing demand standards on the PWSB when these concerns are for the Town of Wrentham and the runoff that may ultimately end up at PWSB’s resource and reservoir which sits nearly one mile from this site.

Fill coming from a quarry or sand pit is by no means to be blanket accepted as “clean fill” on the basis it came from what is alleged or perceived to be a site where no industrial activity has occurred. If machines are excavating, hydraulic fluids can be lost through leaks or accidents and the history of the use of the “clean fill” source site may reveal more information.

This is a high stakes game where correcting problems after they have occurred is far more difficult than prevention. Attorney Buckley stated that the suggestions of testing are greater than what the town of Wrentham may be required to do for building a roadbed. That statement has nothing to do with the level of concern in an aquifer protection district such as we have in this site, notwithstanding the impervious pavement over that fill.

Another concern is the apparent absence of a proper Spill Prevention, Control, and Countermeasure (SPCC) rule (issued under CWA Section 311 and published at 40 CFR part 112) for the site, if approved, for management of potential contamination from the fill and clearing of materials activities, refueling, and maintenance of the equipment. 4,200 truckloads of fill will take a long time to place and lot of equipment to handle.

Thank you for your time and consideration with these aspects of the development proposal.

Respectfully submitted,

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Susan P. and Robert S. English  
1351 West Street  
Wrentham, MA 02093