



TOWN OF LEE
32 Main Street, Lee, MA 01238
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R. Christopher Brittain,
Town Administrator
cbrittain@town.lee.ma.us

September 28, 2023

Mr. Dean Tagliaferro
EPA New England
10 Lyman Street, Suite 2
Pittsfield, MA 01201

The following is a list of comments from the Town of Lee regarding the Upland Disposal Facility (UDF) Pre-Design Investigation Report.

1. The Town requests that GE/EPA conduct a public meeting/presentation of the UDF Design Plan for residents to better understand the details of the 3,800 plus page document.
2. Locations of support areas for the UDF (stockpiles, de-watering, material transfers) are not shared in the plan. These details are requested as soon as possible to determine if the monitoring described in the plan will be sufficient.
3. Please confirm if the adjacent land is still being actively mined for sand and gravel. If so, please include opportunities for additional monitoring that would account for any changes in ground water as a result of future mining that may take place.
4. The current groundwater level contains a slope (based on test wells) at a greater degree than UDF. Historical data shows annual differences in ground water levels but does not seem to account for possible effects of climate change. The Town would like to see that the plan allows for the flexibility of adding additional monitoring and that the UDF is designed to be at least 15 feet above the highest known ground water level.
5. The document (page 29) states that wells MW-2022 1S and 1D will be replaced but does not specify when. The Town would like to see these wells replaced quickly and add PFAS testing to these samples. In addition, the Town feels there should be a more robust down gradient monitoring system.
6. The document (page 36) states that final sampling will occur in fall of 2023 and (page 30) states that "wells will remain in service for continued monitoring". The Town would like further details on if and how monitoring will take place after fall of 2023 to capture year-to-year trends.

7. The document shows the use of a "split analysis" of sample media between GE and the EPA. The testing and lab reports between GE and the EPA however do not seem to show comparable results. Furthermore, it is questionable if the GE tests have met the levels outlined in the QAPP. The Town requests that EPA further investigate if QAPP standards are being met and report back to the town with assurance that the tests are consistent and equivalent.

8. The Town asks that the EPA place a greater emphasis on alternative remediation that could potentially impact the size and scale of the toxic UDF being place in Lee.

Thank you for your consideration. Feel free to contact me with any questions or feedback.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Brittain', with a stylized, cursive script.

R. Christopher Brittain,
Town Administrator

CC:

His Excellency Joseph Biden, President of the United States

The Honorable Edward Markey, U.S. Senate

The Honorable Elizabeth Warren, U.S. Senate

The Honorable Richard Neal, U.S. House of Representatives

Her Excellency Maura Healey, Governor of Massachusetts

The Honorable Paul Mark, State Senator

The Honorable William "Smitty" Pignatelli, State Representative, 3rd Berkshire
Select Board, Town of Lee