



# TOWN OF HOPEDALE

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**Board of Water & Sewer  
Commissioners**

Ed Burt, Chair  
James Morin  
Adam Anderson

Sent via Email March 10, 2023

To: Angela Boyd, LSP, Verdantas

Per our earlier email exchange, this note is intended to provide some additional information related the lead issue at 364 West St, RTN 2-0022153.

## Background

The Verdantas report's background section states:

“There is anecdotal history that unauthorized shooting of shotguns or other firearms may have historically been conducted. The nature of this shooting activity is not known. Due to local concerns, GURR elected to collect surficial soil samples from several areas of the Subject Property. “

The fact of the matter is that the property ownership has been, and still is, a legal issue between the Town of Hopedale and Grafton Upton Railroad (GURR). This has triggered extensive community discussions about the future, and the history, of 364 West Street's 155 acres. Long before any site work was done by GURR, residents raised concerns regarding the historic skeet range that had laid dormant for centuries. Below is an early email warning about this issue while also providing an approximate location of the skeet range. All of which was well known by GURR.

Once GURR disturbed the area, the Conservation Committee noted the possible lead issue during a walkthrough in September of 2021. The Water & Sewer Commission highlighted the issue as part of the Residual Designation Petition filed with the EPA in June of 2022.

The actual background may trigger a different discovery area, or approach. Additionally the question of what was done to the site so that the lead issue which was visibly apparent in the September 2021, is no longer visibly apparent, should be answered.

It is worth noting that all of this site work has been done without approved plans. GURR is operating under an EPA General Construction Permit (CGP), only. As stated by the EPA in an email to the Hopedale W&S Commission, the EPA does not review, or approve the site plans.

To help clarify some of the activity and information related to GURR's West St development could you please respond to the following questions -

1. Does the EPA approve storm water plans (SWPPP)?

When applying for coverage under EPA's Construction General Permit (CGP) the applicant certifies that they have completed a SWPPP in accordance with the permit requirements and agrees to adhere to all conditions in the CGP. EPA does not review or approve any SWPPP, nor does EPA require that the SWPPP be submitted or approved prior to coverage under the CGP.

2. Does the EPA approve site work activities such as the construction of a road?

The CGP requires Best Management Practices and in some cases dewatering sampling to ensure stormwater discharges are controlled to reduce pollution discharged to receiving waters. EPA does not approve any construction activities on a site prior to or during CGP coverage.

3. Does the EPA approve site development plans?

EPA does not review or approve any site plans related to construction for coverage under the CGP. Site plan review and approval is conducted at the local level.

## Additional testing

After receiving the report regarding lead at GURR's West Street site, the Hopedale Water Department performed a ground water test.

The January 27, 2023 report explains that samples taken north of the skeet area, near the Mill Pond / West St property border, and well south at the beginning of the Hopedale Pond (near the old rustic bridge) showed no signs of lead.

However, the sample between those two points, south of the Verdantas samples near the West St Hopedale Parkland border, did show lead in the amount of 9.7 parts per billion (ppb).

Although this level is not actionable, the lead reading from this area highlights concerns regarding the significant "unknowns" and limited scope of the Verdantas report. Specifically:

- Further assessment is warranted to determine if stormwater managed under the CGP contains lead;
- The scope of the samples and overall analysis of the site should be expanded to properly evaluate the groundwater aspects;
- Additional samples would also support the choice of using the average readings. In this situation, a case can be made to use the maximum concentration especially when considering the spatial distribution;
- The Verdantas report suggested there was no imminent hazard to the environment, however we believe the impacts to surface waters, ground water, and soils should be assessed immediately; and
- The Hopedale samples also highlight significant turbidity. As a tributary to the Mill River, this sediment could be a wetlands violation (alteration of a wetland).

The Verdantas report concludes, *"At this time, it appears that a small excavation (preliminary estimated to be less than 500 cubic yards) may be sufficient to obtain a Permanent Solution under the MCP."*

In order to support this conclusion, the significant unknowns should be addressed, especially regarding the extent of metals impacting the site near the wetlands area before the corrective measures are confirmed.

On behalf of the Hopedale Community and the others concerned about this issue, thank you for your attention. If you need anything else from us, please do not hesitate to contact us.

Thank you,

Ed Burt Hopedale Water & Sewer Commission

Cc Blackstone River Watershed Association

Metacomet Land Trust

PEER.org

FW: GU West St Hopedale - Skeet Range - Approx. Location v1.0 20210714 - wet lands

Bill Fisher <bfisher@hopedale-ma.gov>

Wed 7/21/2021 11:04 AM

To: Hopedale Conservation Commission <Conservation@hopedale-ma.gov>

Hi Becca

Here is some information I received off of west street concerning a former skeet shooting range and possible construction by the Rail Road.

Thanks

Bill Fisher Agent

Hopedale board of Health

From: robfahey47@gmail.com <robfahey47@gmail.com>

Sent: Wednesday, July 14, 2021 5:31 PM

To: Bill Fisher <bfisher@hopedale-ma.gov>; Tim Watson <twatson@hopedale-ma.gov>

Subject: RE: GU West St Hopedale - Skeet Range - Approx. Location v1.0 20210714 - Resend

Importance: High

Bill and Tim,

It was nice talking to both of you this morning regarding potential lead contamination resulting from the development of the former skeet range in Hopedale MA. The land is currently owned by the Grafton Upton Railroad and they could be starting development soon.

The proposed GU development in this area could cause significant lead contamination of the Mill River and surrounding wetlands - which are adjacent to the old skeet range.

Below please screenshot of a map which shows the approximate location of the old skeet range. I have circled in red and used an "x" to designate location.

Note: I had sent a PDF this morning, but it was over 6MB's and might have been too large for Hopedale's email server.

If you can, please let me know you have received this email.

If you have any further questions, please let me know.

Thank you,

Rob

<https://outlook.office.com/mail/rd/AAQkADVhMzE4MTk5LTg2MDA1NGUyNi05ZjhlLTg1YzlmNDRIODVjYwAQAFVb5jSFEPGvovzSvexn1c%3D>

