

NORTH CHELMSFORD WATER DISTRICT  
64 WASHINGTON STREET  
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February 5, 2020

Hand Delivered and Electronic Mail

Board of Selectmen  
c/o Paul Cohen, Town Manager  
Town of Chelmsford  
50 Billerica Road  
Chelmsford, MA 01824

Re: Uses at 54 Richardson Road Which Endanger The Abutting Water Source For North Chelmsford

Dear Chairman and Board Members:

We are writing this letter to address our concerns over uses the Town is making of 54 Richardson Road and the dangers that these alleged non-conforming uses present to the water source for North Chelmsford which is located at abutting property owned by the North Chelmsford Water District. Putting aside our position that these uses are not excused as preexisting nonconforming uses, our concern is for the water source and the potential dangers posed to the water source. It is our position that the Leadership of this Town should also be concerned about the dangers posed to the water source by the uses it is making at 54 Richardson Road.

The Town is once again creating a sanitary landfill and/or solid waste disposal site by the admitted dumping of asphalt and wood chips, as well as dumping other unknown wastes at 54 Richardson Road. The dangers posed by this practice was addressed by an Ad Hoc Committee in 2006. At that time, the Ad Hoc Committee concluded, among other things, that “[t]he existing excavated material stockpiles pose a potential threat to the NCWD wells due to potential contaminants in the excavated materials leaching into the groundwater or being transported by surface flow into the brook/wetlands.” .

A major problem, as it was then, is that no one knows what is in the stockpile. The Town should commit to testing the stockpile, as well as to resuming the testing of the existing monitoring wells that were created in response to the Ad Hoc Committee Report, soil and water test should include Volatile Organic Compounds, (VOC’s), Per-Polyfluoroalkyl Substances, (PFAS) and Total Toxicity Characteristic Leaching Procedure, (TCLP), all these procedures are required by the MADEP/USEPA for the North Chelmsford Water District’s Beneficial Sludge/Loam Use Permit that we are required to do semi-annually March/September and the Town of Chelmsford should be required to do the same.

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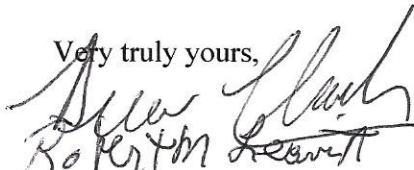
The Town has allowed the Fire Department to operate a motor vehicle repair facility at 54 Richardson Road, without requiring a special permit. The Ad Hoc Committee addressed this use by the DPW in 2006, concluding: "The DPW maintenance facility poses a potential threat to the NCWD wells because of constant use of petroleum products and automotive fluids." The Ad Hoc Committee further stated that "this potential threat can be mitigated with good housekeeping practices, proper handling and storage of hazardous materials, employee training and implementation of the recommendations of the committee." Putting aside that the Town did not have a maintenance facility continuously at the 54 Richardson Road site, that is exactly why a special permit is necessary.

In any event, the Town should commit to testing for PFAS from the existing test wells. PFAS is now a known carcinogen that is associated with firefighting equipment, PFAS is a group manufactured chemicals widely used to make various types of everyday products, automotive, construction, electronics, clothes, cookware, etc. In light of the maintenance facility being operated by the Fire Department, there is a potential risk of the release of PFAS which must be monitored. We are asking the Town to perform appropriate testing.

Finally, the Town is allowing dozens of trucks, which are owned by Asplund Tree Service LLC, which in turn is doing work for National Grid in the Towns of Westford and Chelmsford, to park at 54 Richardson Road, these trucks have been observed doing major repairs. Putting aside that this is an impermissible extension of any preexisting nonconforming use, this use also poses a threat to the water source. This use should be stopped by the Town. Not only are dozens of trucks being stored on the site, but the operator's of those trucks park their vehicles on the site during the work day.

In light of the above, we request that the Board of Selectmen read this letter into Public Record at the Monday, February 10, 2020 Selectmen's meeting and take appropriate action, as outlined above, to avoid a potential disaster and to protect the water source for the North Chelmsford Water District failure to address or take action will force the North Chelmsford Water District to take further action.

Very truly yours,

  
Chairman, Bruce H. Clark  
Clerk, Robert M. Leavitt

BB/rlb

cc. Bruce Harper, Sr.