



Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

Charles D. Baker
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Secretary

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February 2, 2021

Town of Princeton
6 Town Hall Drive
Princeton, MA 01541

Attn: Sherry Patch,
Town Administrator

Re: **Immediate Response Action Plan Modification No. 3
Conditional Approval**

6 Town Hall Drive
Princeton, MA
RTN 2-0021072

Dear Ms. Patch:

On December 14, 2020, MassDEP received an Immediate Response Action (IRA) Plan Modification, submitted on your behalf by Licensed Site Professional (LSP) Jeffrey Arps, requesting the elimination of monthly IRA Status Reports. MassDEP has reviewed and approves the IRA Plan Modification with the following conditions:

1. MassDEP's original IRA Plan Conditional Approval letter, dated January 24, 2020, required submittal of a Monthly Update by way of a BWSC-126 form, in addition to semi-annual IRA Status reports. The IRA Plan Modification received on December 14, 2020, requested elimination of the Monthly Updates. MassDEP agrees to reduce the frequency of update submittal from Monthly Updates to Quarterly Updates, via BWSC Transmittal Form BWSC-126. These Quarterly Updates are intended to off-set the semi-annual IRA Status Reports, which are due by March 3 and September 3 every year until the IRA is complete, via BWSC Transmittal Form BWSC-105. The Quarterly Updates shall be submitted by June 3 and December 3 every year until the IRA is complete. Therefore, the next Quarterly Update is due by June 3, 2021.
2. MassDEP's has received anecdotal information indicating that the Town of Princeton uses a cistern or tank located under the Town Common as a source of water for firefighting purposes. MassDEP requests the following information regarding the cistern/tank, if existent, in the next IRA Status Report, due to MassDEP by March 3, 2021;
 - a) Approximate date of installation, location, and general description of use.
 - b) Construction details and approximate containment volume.

- c) Description of how the cistern/tank is supplied with water (i.e. stormwater, groundwater). Is the cistern/tank a closed system? Please describe.
- d) If not used for firefighting water, what is the current and/or historical purpose of the cistern/tank.
- e) Has the cistern/tank ever been pumped out for a purpose other than firefighting water, and if so, how was the water managed or where was water discharged to?
- f) Has water in the cistern/tank ever been laboratory analyzed for per- and polyfluorinated alkyl substances (PFAS)? If so, please provide a copy of laboratory analytical reports.

If the cistern/tank has not yet been sampled for PFAS, please sample any water in the cistern/tank for PFAS and submit the laboratory analytical report with the next IRA Status Report, due for submittal to MassDEP by March 3, 2021.

3. On February 27, 2020, laboratory analyses of a stormwater runoff sample collected from a drainage pipe outfall from 30 Mountain Road detected a total PFAS-6 concentration of 3,642 nanograms per liter. Please include an Area Drainage Map detailing the overall stormwater drainage/run-off located within the disposal site boundaries in the IRA Status Report due for submittal to MassDEP by September 3, 2021.
4. Collect a minimum of four (4) quarterly, seasonal stormwater run-off samples from the drainage ditches at 30 Mountain Road and 41 Prospect Road and analyze for PFAS. Include stormwater sampling results in an updated Imminent Hazard Evaluation in the semi-annual IRA Status Reports, pursuant to 310 CMR 40.0426(4) and 40.0950, as applicable.
5. Concurrent with each IRA Status Report and Quarterly Update submitted to MassDEP, a Zip file containing all PFAS laboratory analytical reports generated over the reporting period in pdf format must be sent to MassDEP. This Zip file should be sent by email to Paul.Vigeant@mass.gov, with a copy to Matthew.Fitzpatrick@mass.gov.

Please contact Joe Laughton at (508) 849-4018 or via email at joseph.laughton@mass.gov if you have any questions.

Sincerely,



Rebecca L. Buswell
Audits Section Chief
Bureau of Waste Site Cleanup

cc: Princeton Board of Health [tlongtine@town.princeton.ma.us]
Jeff Arps, LSP-of-Record, Tighe & Bond [jarps@tighebond.com]
Mark Baldi, Deputy Regional Director, BWSC, MassDEP-CERO
Mary Jude Pigsley, Regional Director, MassDEP-CERO
Marielle Stone, Deputy Regional Director, BWR, MassDEP-CERO
Michael Leblanc, Section Chief, Site Mgt. & Compliance Asst., BWSC, MassDEP-CERO
Paul Vigeant, Branch Chief, Site Mgt. & Compliance Asst., BWSC, MassDEP-CERO
cc: CERO: file, database [IRA appwrit]