



July 14, 2023

Robert Rosa, Chairman
Town of Rockland Zoning Board of Appeals
242 Union Street
Rockland, MA 02370

RE: Response to Abington & Rockland Joint Water Works letters dated May 30 and 31, 2023

Dear Mr. Rosa and Members of the Board

On behalf of our client, Shinglemill, LLC, Coneco Engineers & Scientists, Inc. (Coneco) is pleased to submit revised Comprehensive Permit Plans (Plans) and supporting documentation for the proposed development located at 75-79 Pond Street Rockland, Massachusetts. These documents address the comments contained within the letters from the Superintendent of the Abington & Rockland Joint Water Works, Kristel Cameron to the Town of Rockland Zoning Board of Appeals (ZBA), dated May 30 and 31, 2023.

5/30/2023 Letter

- 1. The plans show numerous groundwater recharge basins for stormwater recharge. Appendix D of the Stormwater Management Report (Proposed Long Term Pollution Prevention Plan) indicates Good Housekeeping Practices, Provisions for Storing Materials and Waste Products Inside and Under Cover, and Vehicle Washing Controls. However, these brief standard operating procedures do not effectively guarantee that liquid wastes from vehicles (antifreeze, oils, brake fluids, transmission fluids) will not accumulate on the asphalt in parking areas and be washed into the stormwater system during storm events. According to 310 CMR 22.20C (2)(i) - motor vehicle repair operations are not permitted within a Zone A. The noted Long Term Pollution Prevention Plan SOPs are insufficient regarding actual details for how any vehicle maintenance, vehicle washing/cleaning, and spills of liquid wastes will be monitored, policed, managed, and/or prohibited as required within a Zone A. Liquid wastes from future potential vehicle maintenance and vehicle parking/storage pose a significant threat to the quality of the water supply. More robust details on prohibiting and preventing any potential for liquid wastes from motorized vehicles to enter the stormwater management system need to be provided.*

CONECO RESPONSE

All paved parking area's direct water to the stormwater management system, which has been designed for the remove of pollutants in compliance with the Massachusetts Stormwater Management Standards and undergone engineering peer review. The applicant would like to note that the referenced section 310 CMR 22.20C (2) "prohibits the siting of the following new land uses within a Zone A:" While residents of the property will be prohibited from performing motor vehicle repair on the site, the use of the site is a residential multifamily apartment.

- 2. It is unclear if chemicals will be used for de-icing the parking areas in the winter. As noted on Sheet 8, several parking areas are located within the Zone A of Rockland's water supply.*

According to 310 CMR 22.20C (2)(f) the following activities are prohibited within a Zone A "storage or disposal of snow or ice, removed from highways and streets outside the Zone A, that contains deicing chemicals;". When the snow is cleared from the parking areas, where will it be pushed or transported to? The use of de-icing chemicals should be prohibited in all areas of the proposed development.

CONECO RESPONSE

The Long-Term Pollution Prevention plan has been revised stating that Sodium Chloride (Road Salt) shall not be use on the site. Calcium Chloride is proposed as the site's deicing agent. The applicant would like to note that the referenced section 310 CMR 22.20C (2) "prohibits the siting of the following new land uses within a Zone A:" While snow storage will occur in landscaped areas throughout the site, "snow storage from highways and streets outside of the Zone A, that contain deicing chemicals," is not the proposed use of the site. Additionally, a snow storage overburden area has been proposed off of the southeastern corner of the parking areas. This storage area is outside of the Zone A and 100' Wetland Buffer. During extreme snow events, in which snow cannot be stored on site, snow will be trucked off and disposed of in a legal manor.

- 3. Please provide details on how the following Zone A restriction of 310 CMR 22.20C (2)(1) is being met "land uses that result in the rendering impervious of more than 15%, or more than 20%with artificial recharge, or 2500 square feet of any lot, whichever is greater;".*

CONECO RESPONSE

The cover page of the Comprehensive Permit Plans notes the sites gross area as 29.72 Acres, building area as 1.28 acres and non-building impervious as 3.41 acres. This indicates that the project renders 15.8% of its encompassed property impervious. 95.4% of the impervious area on site is directed through stormwater treatment systems and recharged via underground infiltration chambers.

- 4. It is our understanding that the project proponent is planning to test and permit the use of on-site groundwater supply wells. Based on the proximity to the Abington/Rockland Joint Water Works water supply reservoir, we are concerned that any groundwater withdrawals will reduce the safe yield of our surface water supply. Therefore, if on-site wells are planning to be used, we request that the project proponent complete groundwater modeling and/or Firm Yield Estimator calculations which demonstrate that there will be no negative impacts or reductions in the Safe Yield of the Hingham Street water supply reservoir.*

CONECO RESPONSE

Pump tests for the proposed on-site wells will be performed in accordance with the MassDEP approved BRP WS 13 permit conditions by Coneco with oversight by Onsite Engineering to ensure compliance with state regulations. The results of the pump tests, including quantity and quality results, will be provided to the town as required. In accordance with the Guidelines, groundwater modeling is typically not required for new sources seeking a withdrawal rate less than 100,000 gpd. As stated in Section 4.5.3 of the Guidelines, "Zone II and III will, in most cases, not be required for MassDEP approval of public water supply wells with planned yields less than 100,000 gpd." The Interim Wellhead Protection Area (IWPA) will be determined for the public water supply wells in accordance with the Guidelines.

5. *The Abington/Rockland Joint Water Works consider this proposed project to be a serious and significant threat to the Town's water supply. The project is practically surrounded by the Zone A for the Town's water supply and wetlands (encompassing > 90% of the project site). It is preposterous to assume that there will be no degradation or negative impacts on the Town of Rockland Water Supply resulting from this proposed development. As such, the Abington/Rockland Joint Water Works is requesting that the Zoning Board of Appeals (ZBA) require the project proponent to complete a hydrologic study/model of the proposed development to demonstrate that the fate and transport of potential contaminants generated from the development do not pose a threat to the public water supply.*

CONECO RESPONSE

Please see the projects Stormwater Management Report for the hydrologic study and models regarding the proposed development.

5/31/2023 Letter

1. *According to Plan Sheet 12, two (2) dumpsters are proposed to be stored within the Abington/Rockland Joint Water Works Zone A. The storage of waste within a Zone A should not be allowed. What are the specific means and methods to ensure that the dumpsters are not used for the disposal of household hazardous and personal care products? Liquid wastes and/or stormwater entering the dumpsters have the potential to contaminate the adjacent Hingham Street Water Supply Reservoir.*

CONECO RESPONSE

It is acknowledged by the applicant that the storage of residential waste is a concern of the Abington/Rockland Joint Water Works, but to the applicant's knowledge the storage of residential waste in covered dumpsters is not specifically prohibited within the Zone A. It should be noted that the residential waste from the site will be kept in covered dumpsters that will be emptied on a regular basis and disposed of in a legal manner. Additionally, runoff from these areas is directed to the stormwater managements system that will provide the removal and containment of many pollutants.

2. *According to Plan Sheet 19, proposed on site groundwater supply wells are proposed, yet the final location, size, and material are to be determined at a later date. The following comments and questions are posed:*
 - a. *How can a proposed residential project be approved without an approved potable water supply source?*

CONECO RESPONSE

The project can be approved as a comprehensive permit by the Zoning Board of Appeals, subject to potable water source. All modifications to the Plans will be presented to the Board as required.

- b. *Where are the proposed wells to be located and what is the proposed water demand?*

CONECO RESPONSE

The wells are located in the southeastern upland area. Proposed locations of these wells were shown on the 48-Hour Well Pump Test - NOI Plan which has been included in this submission. Pump tests for the proposed on-site wells will be performed in accordance with the MassDEP

approved BRP WS 13 permit conditions by Coneco with oversight by Onsite Engineering to ensure compliance with state regulations. The results of the pump tests, including quantity and quality results, will be provided to the town as required. The current proposed water demand is 34,650 gpd (315 bedrooms X 110 gpd/bedroom = 34,650 gpd)

- c. Any future pump test for the proposed on-site wells should include comprehensive testing and groundwater modeling to clearly demonstrate that there are no negative impacts or reductions to the Safe Yield of the Hingham Street Water Supply Reservoir.*

CONECO RESPONSE

Pump tests for the proposed on-site wells will be performed in accordance with the MassDEP approved BRP WS 13 permit conditions by Coneco with oversight by Onsite Engineering to ensure compliance with state regulations. The results of the pump tests, including quantity and quality results, will be provided to the town as required. In accordance with the Guidelines, groundwater modeling is typically not required for new sources seeking a withdrawal rate less than 100,000 gpd. As stated in Section 4.5.3 of the Guidelines, "Zone II and III will, in most cases, not be required for MassDEP approval of public water supply wells with planned yields less than 100,000 gpd." The Interim Wellhead Protection Area (IWPA) will be determined for the public water supply wells in accordance with the Guidelines.

- d. How is the project proponent plan to meet the requirements of 310 CMR 20.21 and Chapter 4 of the MA-DEP Guidelines and Policies for Public Water Systems?*

CONECO RESPONSE

The proposed on-site wells are being permitted through the MassDEP Source Approval Process in accordance with Chapter 4 (Section 4.3.1) of the MassDEP Guidelines and Policies for Public Water Systems. As such, all requirements as outlined in 310 CMR 22.21 must be met, or the sources will not be approved by MassDEP. As required by the regulations, the Zone 1 around the proposed wells is owned or controlled by the supplier of water and all land uses within the Zone 1 are limited to those directly related to the provision of public drinking water. Additional zoning controls as identified in the Guidelines are only required for wells with planned yields of 100,000 gpd or greater.

Please feel free to contact me at (508) 697-3191 ext. 108 if you have any questions or require additional information.

Best Regards,

Damien J. Dmitruk, P.E.
Principal of Engineering