From: Steve Fischbach [mailto:steve.fischbach@gmail.com]

Sent: Tuesday, March 29, 2011 5:36 PM

To: Jeffrey Crawford

Cc: Susan Forcier; Pallister, Donna **Subject:** Groundwater wells

Dear Mr. Crawford:

After reviewing the March 25, 2011 letter from Donna Pallister and attached map I have a better understanding of what the City is proposing in terms of groundwater monitoring. I am sending this email to oppose the City's proposal to locate groundwater monitoring wells along the perimeter of the property and to reduce the frequency of groundwater monitoring from quarterly to annually. The reasons for this opposition are as follows:

- 1. The direction of groundwater flow was never determined in the Site Investigation Report. It was presumed to be flowing in a northerly direction with the possibility that the groundwater might be flowing in a southeasterly direction. See Site Investigation Report p. 14, par. 14.0 sec. iv. While off site migration of contaminants might be an issue, it is much more important to document contamination of groundwater near the school buildings, where vapor intrusion could become an issue. Therefore, groundwater monitoring wells should be placed near the school buildings instead of the perimeter of the property. Surely, there are locations near the school buildings that are not heavily trafficked.
- 2. Two of the three inoperative groundwater monitoring wells have not been sampled for more than 2 years. The lack of data, caused by the City's failure to comply with its obligation to maintain the remedial systems, is reason alone to deny the City's request to reduce the sampling of groundwater from quarterly to annually. Moreover, DEM should not reward the City's non-compliance with the Remedial Action Work Plan by allowing fewer groundwater samples to be taken.

Finally, I note in my November 19, 2010 letter to Susan Forcier (which you were copied on) I requested to be copied on any correspondence related to the repair of the inoperative groundwater wells. It is distressing that DEM did not grant this request. Once again, I ask to be copied on any correspondence relating to this issue.

Thank you.

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