

Benson R. Gould, LSP, LEP Principal CMG Environmental, Inc.
Loker Turf Field. Review and discuss outstanding environmental questions with:

Wayland Board of Selectmen invited Benson Gould, Principal, CMG Environmental, Inc., Licensed Site Professional (LSP) to a discussion and opportunity for questions and answers raised concerning Loker Turf Field.

If Gould had reviewed the proposed project in relation to the excavation of the area of the former septic system leach field?

B. Gould, LSP shared a schematic overlay that he had prepared to depict the area in question. B. Gould described the overlay to include a base map of old Ransom Environmental Phase II investigation, the 2019 proposed field design, and the areas where Ransom had highlighted as areas of concern. The interesting area was the area of the upper septic system which covers the same area as about half of the field. The question that B. Gould received was questioning if he understood how the project related to the areas of concern. He did, and the overlay answers that question directly.

He stated what was more important was what that information meant. Ransom took 14 soil samples out of 10 boring locations and submitted them for laboratory analysis, tested for a lot of metals, 38 metals in total and several organic compounds. The results of that were that levels were in normal expected ranges, none exceeded what DEP has published for RCS1, or reportable concentrations as acceptable levels of those particular metals. For the organic compounds, there were nearly no detections. A couple undetermined compounds were detected, which were then reviewed more closely, because Dow Chemical Co. was known to use non-standard chemicals. **B. Gould reported that nothing stood out as a contaminant; overall B. Gould's impression was that this area received very little if any contamination.**

D. Levine asked Gould to explain a Tentatively Identified Compounds (TIC) and if they can change over time, and if they would have changed here. B. Gould explained a standard laboratory analysis of either Volatile Organic Compounds (VOC) 8260 or Semi-Volatile Organic Compounds (SVOC) 8270, the EPA method numbers. The samples run through a Mass spectrometer (GC/MS) which is an analytical method used to identify organic compounds in environmental samples, that method measures the mass-to-charge ratio of ions. The samples were then cross-referenced to a library with of thousands of compounds. When the library is searched for an unknown compound, it can frequently give a tentative identification to the unknown; hence the name Tentatively Identified Compound – TIC; by identifying compounds that might otherwise be missed at the site. All TIC compounds come with a percent match of the library reference compound, to have confidence in the sample. B. Gould gave an example, the 8260 analysis checks against 106 target compounds and the standard suite of analyses plus the first 10 or 25 TICs, if there was concern, and the lab would identify what it is. This way to identify unusual compounds or things you were not specifically looking for, but may be of interest. D. Levine asked if B. Gould knew if any TICs were identified at the site. **B. Gould responded that he did not believe any TICs were identified in the report.**

D. Levine shared a concern about Perfluoroalkyl and Polyfluoroalkyl substances (PFAS) contaminants that residents in Town had been reading about it in the public domain, and asked if this an area of concern at this site.

B. Gould reported that PFAS substances had been present in the environment since the 1930's, but have only come to the attention of regulatory agencies in the last few years. B. Gould was almost certain no PFAS testing was done at the site. PFAS are human-made chemical, associated with Teflon and stain-resistant fabrics. Polytetrafluorethylene (PTFE) has a lot of fluorine in it, not a typical element one would find in

organic molecules. B. Gould opined that Dow Chemical was not likely using Teflon. B. Gould reported that generically PFAS were not tested for, PFAS are quite widespread. B. Gould advised that if the Town or the Board was interested in testing for PFAS, it would be quite difficult to test for PFAS in soil and the results would not be definitive; and there are no current PFAS standards for testing.

T. Fay stated people are likely to have exposure to PFAS in everyday life, like dental floss, popcorn bags, and pizza boxes. B. Gould agreed, if the project goes forward as a soccer field and kids play on it, even if there are PFAS compounds there, user exposure to PFAS would be a lot greater elsewhere.

C. Karlson asked B. Gould if he had an opportunity to review any testimony from former Dow Chemical Company employees to understand what they did with hazardous waste at the site. B. Gould answered that that specific information was not available in the DEP file, however Dow Chemical provided DEP a letter dated April 29, 1994, and that letter included interviews with 27 former employees and local Wayland residents. B. Gould found a separate letter summarizing that testimony that was part of the DEP file, but not the actual testimony. C. Karlson followed up with the question if there was anything of concern in the summary letter. B. Gould reported that there was nothing specifically concerning; but it had been prepared by Dow Chemical so therefore subject to debate. B. Gould summarized the letter dated June 9, 1994, which stated that Dow Chemical made it clear that all the employees segregated “reaction wastes from lab experiments” for off-site disposal initially, and those wastes were disposed of by an unnamed contractor. In later years, presumably the 1980’s and 1990’s, the wastes went solely to the disposal incineration facility owned by Dow Chemical in Midland, Michigan.

T. Fay asked B. Gould if he would have his grandchildren play on the field. B. Gould reported he did not have a bad feeling about the Loker project. Wayland residents have a historical bad feeling about Dow Chemical; they felt Dow did not initially do the right thing in Wayland. After a bad experience with Dow, residents were naturally suspicious that Dow tried to hide what they were doing; Dow felt it was corporate privilege or proprietary not to report on activity at the site. Later on, only when pushed by the Town, Dow changed gears, cooperated and then did pretty much the right thing. **Dow ultimately did the right thing, they did a lot of intensive investigation of the property and looked for an awfully lot of compounds that were unusual.** Through that process they did dispose of quite a bit of material offsite, some went to the burn facility in Michigan, and some contaminated soils went to a proper disposal facility. B. Gould confirmed that Dow did clean up that site to the standards to which were held to at the time.

B. Gould reported that both the risk characterizations that he reviewed and the residual chemicals that were tested on site showed very low risk. B. Gould opined that does not mean it is “safe”. “Safe” was not a word professionals use, as industry standards, because it is not definable. **B. Gould reported he would not feel bad about having a grandchild play on that field and nothing he has read in the records would scare him to avoid the area.**

C. Karlson asked anything in the documentation indicated why Dow left the septic fields.

B. Gould responded that nothing he reviewed expressly stated why they did not excavate those areas, but presumes Dow did not excavate that area because the soil samples presented did not identify significant metals contamination or anything of concern in that area. B. Gould reviewed the summary table data and from the 14 soil samples and compared them with today’s current RCS1 soil standards, which is the most stringent standards, and there was not a single exceedance on any of the metals by today’s standards. **He stated that if he were responsible for this site, he would have also left the septic fields.**

M. Antes asked if B. Gould felt the same way about the burn area as the septic system areas. B. Gould reported the burn area was not as clean, it was a concrete pad, and Dow took flammable chemicals and lit them on fire. This practice is not acceptable by current standards, but in the 1960’s the method was

considered good practice. Dow Chemical later sent the chemicals to the burn facility in Michigan. **B. Gould noted that Dow Chemical pulled approximately 600 tons of contaminated soil from the burn area, and stated that the area was investigated and remediated.**

C. Karlson shared another question sent by a resident; a resident questioned if B. Gould reviewed the Weston & Sampson test results from samples taken from the bore holes used to determine the depth of the ledge, and in his opinion was there enough sampling in the leach field area to assure that no hazardous wastes would emerge when the leach field was excavated. B. Gould confirmed he had reviewed all of Weston & Sampson's boring logs. The term he used was 'refusal', for when you hit bedrock at a certain depth. One depth was 17', the majority of boreholes were between 6' and 8' refusal, and some did not hit any ledge or bedrock at all. From this, B. Gould determined that bedrock was an estimated average of 7' or 9' down at the Loker Site. Weston & Sampson had done 14 samples out of 10 borings and did not find much of anything of concern; **B. Gould opined that this was sufficient analysis to characterize adequately the subsurface conditions within the area.**

VOTE TO INSERT ARTICLE INTO TOWN MEETING WARRANT

D. Levine moved, seconded by L. Anderson, that the Board of Selectmen insert the Loker Turf Field proposed by the Recreation Commission into the Town Meeting Warrant.

In discussion, D. Levine reminded the Board that this article was very close at the last Town Meeting when it narrowly failed to pass with the required 2/3 majority, and Board hoped that the proposers would change the article before bringing it back to Town Meeting. D. Levine understood also that the Recreation Commission held the position that this was the best project design and best article and there was little for change. D. Levine took the position that, because the vote was so close at last Town Meeting, the project deserved a second chance at Town Meeting; but it would not be appropriate for the Board to insert it a third time in 2021. D. Levine stated he would vote to support inserting the article.

T. Fay stated his was supportive of inserting the article. He commended the Recreation Commission's diligence in responding to the residents' concerns, and how the Commission continues to do so by hosting a public forum for residents on March 18. T. Fay expressed his appreciation for the long history of the site that B. Gould reviewed. T. Fay referenced an article titled Acquisition of 33-acre former Dow Chemical property for conservation and recreation by resident Anette Lewis published by the University of Massachusetts Boston, Joseph P. Healey Library, in 2000. T. Fay read from the article:

"May 8, 2000 was the night the Wayland Board of Selectman signed the paperwork and gave Dow Chemical Company corporate official Jerry Ring a check for \$1.7 million dollars to acquire the 33 acres at 412 Commonwealth Road, where Dow Chemical had operated a research facility for about 25 years. Today it's the Loker Conservation and Recreation Area. The town's purchase of the property, with a deed restriction for conservation and recreation uses, culminated a decade of contentious events. From 1993 to 2000, the property was the subject of a hazardous waste cleanup. A case study was published by the John Snow Institute in 2004 telling the story of how confrontation eventually led to collaboration, resulting in a win-win outcome. In the summer of 1999, the neighbors' group, that Linda Segal led, asked Dow Chemical to please provide a community relations person because communications had broken down."

T. Fay added that many dedicated volunteer residents felt the land was appropriate to purchase and use for Recreation and Conservation Area. T. Fay concurred with D. Levine that if the article did not pass, the Commission should look at other sites, although the Loker site was the least intrusive option in terms of impacting neighbors.

L. Anderson stated there had been times when the Board has not voted to insert an article because it felt it was not ready, but she felt the article was ready to go back to Town Meeting and stated support to insert the article.

No further discussion. YEA: L. Anderson, M. Antes, T. Fay, C. Karlson, D. Levine. NAY: none. ABSENT: none. ABSTAIN: none. Adopted 5-0.

VOTE TO SUPPORT AND RECOMMEND APPROVAL OF THE LOKER TURF ARTICLE

T.Fay moved, seconded by D. Levine, that the Board support Loker Turf Field proposed by the Recreation Commission.

- **L. Anderson** stated she had not always supported the article, had been concerned with the costs, but had looked at what it would cost to build more grass fields, and turf has a clear advantage over a 20-year period. L. Anderson also recognized the difficulty in locating other suitable sites especially in neighborhoods; and opined that this location was an excellent location.
- **D. Levine** stated the need for more fields was apparent, he had questioned grass versus turf, while turf has clear advantage when it comes to playing time, and he had struggled with the Commission's decision not to make a substantive change with the infill. D. Levine stated his support for the article given the need for a field in this Town.
- **M. Antes** would be interested in hearing the League of Women Voters presentation at the March 18 Forum, which would be after the Board votes to support the article, and therefore would abstain from the vote. M. Antes did not disagree with the points the Board has made, understood the need for fields, but had asked for another public forum to allow residents to see the bigger picture in terms of the capital plan, and although the forum was scheduled, it was not before the vote, and therefore stated she would abstain.
- **T. Fay** responded to M. Antes point, and reported that the Recreation Commission had looked at almost a dozen other sites for a turf field, and felt this site was the least intrusive. T. Fay gave the example that the Middle School site was studied during the library site investigation and designed around the burn dump, hated the idea of a field at Greenways, and Holiday Road/Orchard Lane would be a twelve year legal battle. Other sites have their own challenges, and Loker was determined to be the best site.
- **C. Karlson** recognizes the Town has done a lot of work to answer concerns about traffic, tree removal, vernal pools, environmental concerns, and would vote to support the article.

YEA: L. Anderson, T. Fay, C. Karlson, D. Levine. NAY: none. ABSENT: none. ABSTAIN: M. Antes. Adopted 4-0-1.

TOWN MEETING WARRANT ARTICLE will go before the Wayland Annual Town Meeting voters at Town Meeting beginning on April 5, 2020.