Acton Board of Health  
472 Main Street  
Acton, MA 01720

Dear Acton Board of Health Members,

Thank you again for all the time and effort you have given to considering the issue of private wells within close proximity to the W.R. Grace Superfund Site. ACES (Acton Citizens for Environmental Safety), would like to share with you the results of some of its research on private wells in other Massachusetts communities, since the Board of Health’s stated intention was to use the time before the December 9th public hearing continuation to gather additional relevant information.

ACES has researched Board of Health private well regulations from 15 Massachusetts towns and has compiled the results into the enclosed summary tables, which we hope you will find useful. State recommendations, as provided in the Massachusetts Department of Environmental Protection document: "Private Well Guidelines", are also included.

Table 1. provides information about the availability of public water in each community. In most of the towns private well water is not the sole source of drinking water. The other comparison tables summarize the following requirements:

Table 2. Water Quality Testing  
Table 3. Setback Distances  
Table 4. BOH Private Well requirements at time of construction  
Table 5. Well Decommissioning  
Table 6. Irrigation Wells (where specified)

**Distance from contamination**  
As you can see from Table 3., some communities (Boxborough, Groton, Harvard, Littleton, Lunenburg, and Stow) deal with the issue of potential contamination by requiring 400 foot setbacks from both hazardous waste spill sites and active or closed landfills. Northborough has a 1000 foot setback from any waste disposal site/landfill.

As part of the permitting process, many towns require the identification of potential sources of contamination within either a 200 foot or 400 foot area of the proposed well. (See Table 4.). Boxborough, Burlington, Charlton, Groton, Harvard, Lexington, Littleton, Lunenberg, and Stow require this information.

**VOC testing**  
Water quality analysis for VOCs (volatile organic compounds) is required in Burlington, Charlton, Lunenberg, and Stow. Regulations in Lexington, Littleton, Pepperell, and Westford specifically state that VOC testing may be required at the discretion of the Board of Health. Carlisle requires VOC testing (including MTBE), for wells on properties located within "Residence District A", an area potentially affected by a contamination plume from a leak in an underground gasoline storage tank.

**Movement/spread of contamination**  
Lexington’s regulations state that "The Board of Health reserves the right to ban any well that may contaminate a water supply". (99% of Lexington receives its drinking water from a public water supplier [the MWRA].)

Burlington, Charlton, Lexington, and Stow’s Board of Health regulations specify that a well is abandoned/must be decommissioned if it meets one of six criteria including: if it "has the potential for transmitting contaminants from the land surface into an aquifer or from one aquifer to another and the situation cannot be corrected."

According to Burlington’s Health Director the use of existing private irrigation wells, as well as proposed ones, has been prohibited in Burlington on a case-by-case basis when water quality samples show VOC levels above drinking water standards. This is done to:

* prevent movement of a contaminant plume; (there are several plumes close to town wells);
* prevent the irrigation well from posing a potential human health risk
* prevent potential interference with ongoing remediation of existing contamination.

ACES has copies of the individual private well regulations, and would be happy to share this material. ACES values its good relations with the Board of Health and with the other Acton Town Boards, and Departments, and looks forward to working cooperatively with you in the future.

Again, thank you very much for your attention to this issue.

Sincerely,

ACES Board

cc: Acton Board of Selectmen  
Acton Conservation Commission  
Acton Planning Board