

From: [Don Provencher](#)
To: ["Jennifer Hager"](#)
Cc: ["Wilkinsonville Water District"](#)
Subject: RE: Wilkinsonville Water - Review Comments on UGPG Site Plans Bldgs #2 & #3
Date: Thursday, July 21, 2022 11:00:34 AM

Great! I think that's a great idea!

There is far more concern, in my opinion, of salt getting into the wetlands and Zone II than sand. Sand can be mitigated by catch basin cleaning, especially twice per year! That really should prevent sand from getting into these resource areas. There is no way to recapture salt after it's applied. Once applied it's gone to the environment. As long as its application is minimized, through the use of liquid brine as the permit condition will provide, it can be managed in the environment, as precipitation and runoff and groundwater flow will dilute and move the salt through the environment, and minimize its concentrations from building to excessive levels.

Thanks, Don

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From: Jennifer Hager [mailto:j.hager@town.sutton.ma.us]
Sent: Thursday, July 21, 2022 10:50 AM
To: Don Provencher <don@provencher.com>
Cc: Wilkinsonville Water District <wilkswater@verizon.net>
Subject: RE: Wilkinsonville Water - Review Comments on UGPG Site Plans Bldgs #2 & #3

Whew! SO glad you got back to us Don! I will adjust these conditions as suggested by you. You are correct that we pulled sand due to other resource area concerns, but as the O & M plan the y submitted provides for catch basin cleaning at least twice a year, we'll accentuate this as a condition along with documentation provided to the Town and allow the use of sand as you've specified.

Thanks again!!! Jen

From: Don Provencher [mailto:don@provencher.com]
Sent: Thursday, July 21, 2022 10:33 AM
To: 'Jennifer Hager' <j.hager@town.sutton.ma.us>
Cc: 'Wilkinsonville Water District' <wilkswater@verizon.net>
Subject: RE: Wilkinsonville Water - Review Comments on UGPG Site Plans Bldgs #2 & #3

Hi Jenn:

Thanks for sending this to us. For clarification, comment #4 of my April 25, 2022 memo did not recommend using only calcium chloride in Zone II areas. That part of my comment #4 was actually summarizing what Unified's Long-Term Pollution Prevention Plan (LTPPP) was proposing for deicing practices. The point of my comment #4 was that I was recommending that only liquid brine or sand be used within Zone II areas, or paved surfaces that drain to the Zone II. As that condition reads below, the first part appears to conflict with the last part. Therefore, I offer the following edits to the proposed permit condition below. New recommended text is in red, text recommended to be deleted is highlighted yellow with a strike through:

*"Per comment #4 of the 4/25/22 memo from Donald Provencher on behalf of Wilkinsonville Water District, only **liquid brine, sand, or sand treated with liquid brine** ~~calcium chloride~~ shall be used within the Zone II areas and next to jurisdictional wetlands. ~~Any sand and other forms of~~ deicing agents shall be ~~located~~ **applied** outside these resource areas. **All deicing materials** ~~and~~ shall be **stored** in containment to prevent precipitation and/or runoff to come into contact with these materials. No crystalized sodium chloride, crystalized calcium chloride or other crystalized salt shall be allowed to be applied within drainage areas tributary to or through stormwater basins located within the Zone II and that deicing practices within these areas shall be limited to ~~pre-treatment with a~~ **liquid salt brine, sand, or sand treated with liquid brine**. These areas are as depicted on the Alternative Deicing Restriction Areas plan dated 6/3/22."*

This comment as written below restricts sand from being applied in the Zone II area. That is not my intent. I am guessing that concerns with using sand might have been a request of the conservation commission perhaps, to avoid sand impacting wetlands? Either way, I would prefer that sand, with or without brine, be applied in Zone II areas instead of crystalized salt. The catch basins will need to be cleaned regularly (annually would be acceptable) to evacuate any sand from their sumps, and that will prevent sand from impacting any resource areas. Annual cleaning of catch basins might actually be a good permit condition, if not already provided. The idea is to use only liquid brine typically for pretreatment, followed by liquid brine again for additional treatment, or sand alone, or sand treated with liquid brine for additional treatment. Lastly, I do not have a preference of what kind of salt brine is used, whether sodium chloride or calcium chloride. They both have their drawbacks. Sodium chloride could cause issues with sodium for people with low sodium diets, but calcium chloride actually doubles the amount of chloride applied in the environment due to its molecular structure, as compared to sodium chloride. But in either case, applying salt as liquid brine, with or without sand, minimizes the amount of salt because it is used more efficiently, since it is already melted, and no salt is left behind, as compared to crystalized salt. Hope that all makes sense.

I am fine with the plans with the deicing and fertilizer restriction areas.

Please let me know if you have any questions. Thanks for reaching out!

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From: Jennifer Hager [<mailto:j.hager@town.sutton.ma.us>]
Sent: Wednesday, July 20, 2022 5:24 PM
To: Don Provencher <don@provencher.com>; Wilkinsonville Water District <wilkswater@verizon.net>
Subject: RE: Wilkinsonville Water - Review Comments on UGPG Site Plans Bldgs #2 & #3

Sorry – hit the send button TOO SOON!

Hi Again Guys – The Board delayed action until this Monday in part hoping to make sure you are good with the current plans, etc. for Unified. I've included the link to any new materials as of July 11th here: <https://www.suttonma.org/planning-board/pages/july-11-2022-meeting-materials> and link from June 27th below has the plans with the deicing and fertilizer restriction areas. The current conditions we propose related to these two items are as follows:

Per comment #4 of the 4/25/22 memo from Donald Provencher on behalf of Wilkinsonville Water District, only calcium chloride shall be used within the Zone II areas and next to jurisdictional wetlands, any sand and deicing agents shall be located outside these resource areas and shall be in containment to prevent precipitation and/or runoff to come into contact with these materials. No crystalized sodium chloride, crystalized calcium chloride or other crystalized salt shall be allowed to be applied within drainage areas tributary to or through stormwater basins located within the Zone II and that deicing practices within these areas shall be limited to pre-treatment with a liquid salt brine. These areas are as depicted on the Alternative Deicing Restriction Areas plan dated 6/3/22.

Per comment #5 of the 4/25/22 memo from Donald Provencher on behalf of Wilkinsonville Water District, application of fertilizer shall be prohibited within the Zone II areas and next to jurisdictional wetlands as well as within drainage areas tributary to or through stormwater basins located within the Zone II. These areas are as depicted on the Fertilizer Use Restriction Areas plan dated 6/3/22.

Please let me know ASAP if you have any outstanding concerns or think anything should be adjusted/added. Thanks! Jen

From: Jennifer Hager [<mailto:j.hager@town.sutton.ma.us>]
Sent: Wednesday, July 6, 2022 9:50 AM
To: 'Don Provencher' <don@provencher.com>
Cc: 'Wilkinsonville Water District' <wilkswater@verizon.net>
Subject: RE: Wilkinsonville Water - Review Comments on UGPG Site Plans Bldgs #2 & #3

Hi Don: Just checking in to see if you and the district were satisfied with the response to your comments (pages 9-16 of attached letter) and plan changes as the Board is hoping to wrap up the review this coming Monday. Thanks! Jen

Link to revised plans: <https://www.suttonma.org/planning-board/pages/june-272022-meeting-materials>

From: Don Provencher [<mailto:don@provencher.com>]
Sent: Monday, April 25, 2022 1:55 PM
To: 'Jennifer Hager' <j.hager@town.sutton.ma.us>

Cc: 'Wilkinsonville Water District' <wilkswater@verizon.net>

Subject: RE: Wilkinsonville Water - Review Comments on UGPG Site Plans Bldgs #2 & #3

Great! Thanks for getting back to me!

I was concerned if you would get this in time since I saw your out-of-office reply e-mail, so I appreciate the extra effort in getting your reply confirmation to me!

Thanks, Don

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From: Jennifer Hager [<mailto:j.hager@town.sutton.ma.us>]

Sent: Monday, April 25, 2022 1:42 PM

To: Don Provencher <don@provencher.com>

Cc: Wilkinsonville Water District <wilkswater@verizon.net>

Subject: Re: Wilkinsonville Water - Review Comments on UGPG Site Plans Bldgs #2 & #3

Got it Don! Jen

Jennifer Hager,
Sutton Planning &
Economic Development Director
508-865-8729

On Mon, Apr 25, 2022, 9:33 AM Don Provencher <don@provencher.com> wrote:

Hi again Ms. Hager:

Sorry for the last minute update, however, Wilkinsonville Water did request my further review of the Groundwater Protection District special permit application, which I believe is being heard this evening, so I wanted to submit the attached REVISED memo for the Board's consideration before this evening's meeting.

The only change in this memo, now dated April 25, 2022 (revision #1), is item #12, which includes our comment and recommendations regarding the applicant's statement that the project in no way adversely affect the water quality or quantity in the Groundwater Protection District. The initial items #1 – 11 in the memo remain unchanged from my initial April 21, 2022 submission which you received.

Again, the only new information is item #12.

If you could please reply that you received this revised memo, that would be greatly appreciated. Thanks for your attention to this matter.

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From: Don Provencher [mailto:don@provencher.com]
Sent: Thursday, April 21, 2022 5:31 PM
To: 'Jennifer Hager' <j.hager@town.sutton.ma.us>
Cc: Shelley Gorman (wilkswater@verizon.net) <wilkswater@verizon.net>; 'Jeffrey Walsh' <JWalsh@gravesengineering.com>; 'Piekarski, Matt' <MattP@thekraftgroup.com>
Subject: Wilkinsonville Water - Review Comments on UGPG Site Plans Bldgs #2 & #3

Hello Ms. Hager:

Please accept on behalf of my client, the Wilkinsonville Water District, the attached memo of review comments for the above site plan permit application. This memo has been reviewed and authorized for submission by the District.

Please call or reply with any questions, and please confirm that you received this if you could. Thanks, Don

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