

October 8, 2008

Anthony Petrucelli, Chair
Westfield Planning Board
City Hall
59 Court Street
Westfield, MA 01085

Reference: J. Dirats & Co., Inc., 41 Airport Road, Westfield

Dear Mr. Petrucelli:

I am writing you on behalf of the Barnes Aquifer Protection Advisory Committee (BAPAC) to provide our comments on the site plans for the proposed expansion at J. Dirats & Co., Inc. at 41 Airport Road presented at the October 7th meeting by Eric Forish of Forish Construction. The committee was created in 1989 to address developments of regional impact that are proposed within the aquifer to ensure that drinking water resources remain safe for the more-than 60,000 people that it serves.

The stormwater management system at the site currently consists of a series of drywells for infiltrating roof runoff, a retention basin with a drywell preceded by a grassed swale between the driveway and a neighboring lot occupied by Jarvis Surgical, and two drywells in a small depressed area on the north side of the building. BAPAC understands that roof runoff will continue to be drained to a series of drywells around the property and the retention basin with the drywell and grassed swale on the southeast side of the property will remain. Driveway runoff will be directed via sheet flow to a new retention basin constructed with a forebay and three drywells. Given these circumstances, BAPAC has the following comments.

1. Drywells are considered Class V Injection Wells by the Massachusetts Department of Environmental Protection (MA DEP). MA DEP requires all drywells, pre-existing and new, to be registered with them. For more information on registering a Class V Injection Well contact DEP's Underground Injection Control coordinator at (617) 348-4014.
2. Pre-treatment for oil and grease, heavy metals, particulates, and road salt are recommended prior to infiltration. It has been the City of Westfield's policy to require the proprietary hydrodynamic separator Stormceptor for this practice although such devices are not effective at treating road salt. The proposed forebay does not function as an oil and grease trap and may allow direct infiltration during smaller storm events. A gate valve after the Stormceptor and before the infiltration device should be installed to allow for isolation of contaminants in the event of a spill.
3. Although drywells in retention basins function to expedite infiltration of water to prevent ponding and freezing, this is not a preferred treatment practice for aquifer protection. Greater pollutant load attenuation can be achieved through direct infiltration of the soils on the floor of the retention basin. This offers an extended treatment time versus flushing water through a drywell for quick draining. BAPAC requests that the drywells be located outside of the retention basins

and a manhole cover on the drywells instead of a grate to prevent water collected through sheet flow from entering the drywell.

4. It appears from the site plans provided that one of the drywells will be in violation of both Title V and the Underground Injection Control regulations both of which require drywells to be sited at least 50' from a septic tank and 100' from a septic leach field.
5. An Operation and Maintenance Plan for the stormwater management system should be submitted to the Planning Board and annual maintenance logs submitted to the Water Resources Department to ensure maintenance of the system is occurring.
6. As a metallurgic testing facility, it is unclear to BAPAC whether or not solvents are used and if Dirats is a generator of hazardous waste as defined by MA DEP. According to the City of Westfield's SWAP Report completed by MA DEP (April 15, 2003), Dirats is a small quantity generator of hazardous material. Dirats began operations at this location in the 1970s, according to Mr. Forish, which predates the City of Westfield's adoption of the Water Resource Protection District Zoning Ordinance. BAPAC recommends that the Board determine the extent to which this facility may be a non-conforming use given Section 1823 Prohibited Uses of the zoning ordinance. According to Mr. Forish, one of the reasons for the building expansion is to store waste products generated at the facility which are currently stored in trailers at the site. The site also has a septic system which makes it critically important that no floor drains are included in the planned expansion. Alternatively, any floor drains deemed necessary to operations must be plumbed to a permitted tight tank.

Thanks you for the opportunity to comment.

Sincerely,

Michael Czerwiec, Vice-Chair

CC: Eric J. Forish, Forish Construction, P.O. Box 358, Westfield, MA 01086