



TOWN OF HAMILTON Conservation Commission

Town Offices at Patton Homestead
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February 3, 2025

Kyle F. Rowan
Project Manager
Gale Associates, Inc.
300 Ledgewood Place, Suite 300
Rockland, MA 02370

By email to: kfr@gainc.com

Re: Ongoing/Perpetual Special Condition requirements for the Hamilton-Wenham High School Athletics Project

Dear Mr. Rowan:

The Conservation Commission has been advised, through legal counsel, that as a result of the Commonwealth's passage of Section 280 of Chapter 238 of the Acts of 2024, signed by Governor Healey on November 20, 2024, the 2023 Order of Conditions governing the Hamilton-Wenham High School Athletics Project is still binding as its expiration fell within the two-year tolling window. Because the September 6, 2024 Enforcement Order only references the 2024 Order of Conditions, its continued viability has been called into question. However, because the relevant conditions are virtually identical and in the interest of the timely resolution of the comments that have been raised, the Commission respectfully requests your response to the following items.

As discussed at its meeting on January 15, 2025, the Conservation Commission is requesting additional information regarding the testing of the artificial turf for the Hamilton-Wenham High School Athletics Project. Gale Associates has provided PFAS test results from Applied Technical Services dated August 28, 2024 for the artificial turf components. The opening paragraph of the relevant condition reads as follows:

"Prior to the commencement of work on-site, the applicant will engage an independent testing laboratory to test the turf, infill, and shock pad for PFAS, PFOA (Perfluorooctanoic acid), PFOS (Perfluorooctane Sulfonic Acid), and "Gen X" chemicals PFBS (perfluorobutane sulfonic acid and its potassium salt) and HFPO – (hexafluoropropylene oxide dimer acid and its ammonium salt), using best available methodology. The results of these tests will be submitted to the Commission before work is begun."

Specifically, the Commission would like further information and explanation regarding the following questions and comments:

- 1.) Please provide a narrative explaining the type of testing utilized and rationale for the methodology used for testing. The Commission would like to ensure that the "best available methodology" was followed in conducting and reporting the tests.

- 2.) The testing was done on the following components of the turf fields: shock pad, turf material, and Brock infill. Although the Spinturf testing is reported to include infill sand, the Commission was not able to discern whether either of the contracted labs, RTI Labs, Inc. or Applied Tech Services, tested sand. Both lab reports appear to be for the turf materials. Please clarify if sand was included in the testing. Please provide a brief overview narrative of the materials in the turf fields on which the testing done and how that conforms to the testing condition in the Order of Conditions.
- 3.) Please confirm that the tests for all the materials within the turf field were conducted consistent with the requirements in the Order of Conditions. None of the stormwater drainage system components were tested. Notably, there are a significant number of 12-inch flat panel drains composed of plastic materials that may be a potential source of PFAs that were not tested. Please explain why the drainage materials were not tested.
- 4.) Not all of the PFA parameters appear to be included in each of the material tests. Commissioners reported difficulty in matching the PFAs required to be tested with the lists of PFAs that were in the data results tables from the three labs. Additional clarification would be helpful because the tables of the PFAs tested by different laboratories are dense and do not appear to be organized for ease of review. The following specific concerns were noted:
 - a) The Brock infill testing, 5/24/23, does not appear to include all the PFAs required. PFDA and HFPO-DA do not appear to be included.
 - b) The Applied Tech Services, 8/28/24 testing does not appear to have included HFPO-DA, PFHpA, PFBS, and the PFA6 Sum. 3) The RTI Labs Inc. testing 9/19/24 does not appear to provide the PFA6 Sum.

The Commission appreciates your attention to these questions and concerns and looks forward to discussing these issues in greater detail at the February 12, 2025 Conservation Commission meeting. The Commission requests your response to the following items via e-mail to the Planning Director for discussion at the February 12, 2025 meeting.

Kind regards,

Denise Kelly, Conservation Commission member
On behalf of the Hamilton Conservation Commission