

**From:** [Morash, Melanie](#)  
**To:** [Diane McCausland](#)  
**Cc:** [Allen Dorothy](#); [McGinty, Angela](#); [ssadwick@tewksbury-ma.gov](mailto:ssadwick@tewksbury-ma.gov); [Shelly Newhouse](#)  
**Subject:** Sutton Brook - EPA Comments - Gas Probe Replacement  
**Date:** Tuesday, February 11, 2025 3:40:02 PM

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Hi Diane,

Based on the construction information provided of the original GP-6 and GP-7 gas probes, EPA assumes that the replacement gas probes will replicate the original gas probes (i.e., depth and materials). Please advise if otherwise.

Here are some comments on your installation memo, *"Soil Gas Probe Installation Procedures"*:

### **Materials**

1. *"a) Casing, screen, and riser pipes shall be ¾-in diameter, Schedule PVC."*

The schedule of PVC to be used for the screen and riser pipe is not identified. Additionally, the casing should not be included in this line as it is specified below as steel pipe. Revise accordingly.

### **Pre-Installation**

2. *"a) Identify SG replacement locations more than 2 ft, but less than 5 ft, offset from the original installation locations of SG-6 and SG-7."*

There is no mention of performing any decommissioning activities associated with the original installation locations of SG-6 and SG-7. Due to the proposed proximity (2- to 5-feet) from the original installation locations of SG-6 and SG-7, the original locations should be evaluated for possible preferential gas migration pathways (short-circuiting) at the ground surface, such as, hand digging to a depth of about 1 ft at the original locations to confirm that the PVC pipes are not present, but if found to be present fill the PVC with grout or bentonite and construct a seal at the ground surface. Revise the plan accordingly.

3. *"b) An underground utility check shall be performed before drilling begins (at a minimum via Digsafe)."*

Are there plans to retain the services of a private utility locating company in addition to notifying Digsafe? If not, this should be arranged and the narrative in the memo should specify this. The services of a private utility locating company are contemplated within the 2016 Health and Safety Plan (HASP), which is attached (as a whole) to the November 2024 O&M Plan, Revision 1 as Appendix C.

### **Installation**

4. *"b) Advance boreholes to 7 ft bgs."*

The original SG-7 location was installed to a depth of 5 feet below ground surface (bgs) and the original SG-6 location was installed to a depth of 7 feet bgs. Revise the text to confirm that the boreholes will be advanced to 5.5 feet bgs and 7.5 feet bgs, respectively.

5. *“d) Assemble the 5-ft long slotted screen pipe and 5-ft long solid riser pipe above ground and lower into the boring”.*

The original SG-7 location was installed to a depth of 5 feet bgs. A 3-foot long slotted screen pipe and 5-foot solid riser pipe is needed to replicate the original SG-7 gas probe. Revise the text accordingly.

6. *“g)Install a protective steel casing at the ground surface. Fix the protective well casing in place using 2-ft thick (minimum) cement concrete collar.*

It is unclear how the 2-foot thick (minimum) cement concrete collar will be installed with sand installed to 1-foot bgs. Additionally, revise the text to confirm that the extent of the concrete collar will be installed horizontally beyond the extents of the boring to provide a seal at the ground surface.

A response within 45 days, or by **Friday, March 28, 2025**, is appreciated.

Regards,

Melanie

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**From:** Diane McCausland <dem@e-emi.com>

**Sent:** Wednesday, January 29, 2025 9:39 AM

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**Cc:** Allen Dorothy <dorothy.t.allen@state.ma.us>; McGinty, Angela <amcginty@eaest.com>

**Subject:** Sutton Brook - Gas Probe Replacement



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As you know, a landfill gas monitoring event at the Sutton Brook Site was conducted on October 14, 2024. During the October 14 event, GES was unable to find the three gas probes (SG-6, SG-7, and SG-8) located outside of the fence along the northern Site access road (see attached Figure 1 for locations). In an effort to locate the gas probes, GES took the following actions:

- November 14 - Heavy vegetation along the access road was carefully removed using a brush hog and hand tools, and Gas Probe SG-8 was located.
- November 27 – The locations of SG-6 and SG-7 were checked in the field using survey coordinates and a handheld GPS unit. SG-6 and SG-7 were not found and no remnants were present. As a check, the handheld GPS unit located SG-8.

Based on these efforts, it appears that SG-6 and SG-7 have been destroyed. In order to continue monitoring landfill gas, SG-6 and SG-7 will be replaced, pending receipt of access permission. Attached is a memo describing installation procedures.

The gas probes will be installed prior to the spring landfill inspection and landfill gas monitoring event, pending receipt of access permission. Please contact us with any questions or comments you may have.

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