

DRAFT PUBLIC INVOLVEMENT PLAN

Gardner Sludge Landfill Expansion

808 West Street

Gardner, Massachusetts

Prepared by:

The City of Gardner

95 Pleasant Street

Gardner, MA 01440

as of November 2024

DRAFT PUBLIC INVOLVEMENT PLAN

City of Gardner Sludge Landfill Expansion

INTRODUCTION

Pursuant to 301 CMR 11.01, the City of Gardner (City) initiated the Massachusetts Environmental Policy Act (MEPA) process by filing an Environmental Notification Form with the MEPA Secretary of the Executive Office of Energy and Environmental Affairs on December 12, 2022. The MEPA Secretary issued a Certificate on the Environmental Notification Form (EEA Number 16643) on February 10, 2023 requiring that the City prepare a Draft Environmental Impact Report (DEIR) pursuant to MEPA; M.G.L. c. 30, ss. 61-62L and Section 11.06 and 11.11 of the MEPA Regulations (301 CMR 11.00). With respect to Environmental Justice, the Certificate indicated that while the Project Site is not located within one mile of an Environmental Justice population, the DEIR should establish a public involvement plan (PIP) to engage nearby Environmental Justice populations during the remainder of the MEPA review process. This Draft PIP is intended to meet that obligation.

This Draft PIP contains a description of measures undertaken by the City to promote public involvement by such Environmental Justice populations through both the MEPA review process and will subsequently be utilized during the Massachusetts Department of Environmental Protection (MassDEP) permit application process that will follow for the Project, including best practices listed in the MEPA Public Involvement Protocol for Environmental Justice Populations (the "MEPA Environmental Justice Public Involvement Protocol") that the City has or intends to employ. Through the development of the Draft PIP, the City has consulted with the Energy and Environmental Affairs Office of Environmental Justice and Equity and the MEPA Office regarding community engagement strategies appropriate for the Project on October 3, 2023, March 16, 2024, and July 18, 2024. This Draft PIP is intended to be a living document and may be revised as necessary during the course of the Project. If revisions are proposed, the City will add the proposed changes to the online information repository and will send a notice of the availability of the revised PIP to the email list (**Attachment 1 and 2**). The draft PIP will be appended to the DEIR when filed with MEPA; however, will continue to be utilized and updated through the MassDEP permit approval process.

The Draft PIP has been distributed to those listed on the expanded Environmental Justice Reference List (see **Attachment 1**), which includes all Community Based Organizations, relevant tribes/indigenous organizations (as applicable), all statewide entities, and those located in municipalities within one mile of the Project Site. Finally, a public information meeting about the Project will be held on February 10, 2025, from 6pm-8pm at 95 Pleasant Street, Room 121, Gardner, MA 01440 before filing the DEIR.

In addition to the above, the Draft PIP contains background information on the Project Site; lists public involvement that has occurred to date; describes proposed public involvement activities; and presents a schedule for those activities; explains how community concerns will be address through the process; outlines the roles and responsibilities of those involved in implementing the Draft PIP; and describes how the Draft PIP will be revised in the future to incorporate feedback from the public.

PROJECT DESCRIPTION

PROPOSED PROJECT

As described in the Environmental Notification Form, the City is proposing the Project, which would construct an 8.75-acre expansion to the existing sludge landfill located at 850 West Street, Gardner (H32-16-4; Route 68) (Project). The Project will include three cells and increase the capacity of the landfill by approximately 276,500 cubic yards, which is conservatively projected to accommodate the City's sludge production for at least seventeen years or until 2044. The Project is immediately to the west of the existing landfill and will allow for continued sludge landfill operations as an extension of the western face. Construction of the Project involves the removal of vegetation and forested area, then removing up to 20 feet of soil and regrading the Project Site to establish a sub-base. The subbase will be a minimum of 4 feet above the seasonal high groundwater elevation. The Project would leave the remaining 102.2 acres on the Project Area undeveloped.

BACKGROUND

Sludge, defined as "Sewage sludge" is solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment works (40 Code of Federal Regulations (CFR) 503.9(w))." Sewage sludge includes, but is not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment processes; and a material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screenings generated during preliminary treatment of domestic sewage in a treatment works (40 CFR 503.9(w)).

Sludge is a natural byproduct of the wastewater treatment process requiring disposal. The City's Wastewater Treatment Facility (WWTF), located on Plant Road in the adjacent Town of Templeton, MA, serves approximately 20,000 City residents (about 95 percent of the City's population), 1,680 Town of Ashburnham residents (about 25 percent of the Town's population), and 150 East Templeton residents (about 2 percent of the Town's population). Sludge or wastewater treatment residuals are generated during the primary and secondary treatment stages at the WWTF and require the City to have a place to dispose of this solid material. The City's Sludge Landfill is a lined facility dedicated to the disposal of the City's WWTF sludge removed during both the primary and secondary stages of the City's wastewater treatment process.

The City's Sludge Landfill was originally site-assigned, which is a process that determines if a piece of land is appropriate for a solid waste management facility, as a 37.65-acre site in August 1986 by the Department of Environmental Quality Engineering at its current location in the Project Area.¹ While a larger parcel was site-assigned, the disposal needs at the time only required the City develop approximately 9.7-acres to create the Sludge Landfill. Developing the site as needed

¹ Note the current MassDEP Residuals Management Program policy on the Design and Operation of Sludge Landfills states that such sludge-only disposal facilities are not subject to the site assignment requirements of Chapter 111, Section 150A (MassDEP Residuals Management Program. (1983) *Policy on the Design and Operation of Sludge Landfills*. Retrieved from <https://www.mass.gov/doc/sludge-landfills-design-operation/download>).

has allowed the City to be flexible to changing regulations and best available technologies to protect human health and the environment. The current lined area of the landfill occupies approximately 7.3 acres and has been in operation since November 1990. Originally approved with a volumetric capacity of approximately 140,000 cubic yards, this volume provided a life expectancy of approximately 25 years at a maximum generation rate of 80-100 cubic yards per week (4,160-5,200 cubic yards per year). The landfill was later vertically expanded through a permit application and authorization to construct issued from the MassDEP on February 3, 2016. With this vertical expansion, the capacity of the landfill was increased by 107,000 cubic yards and the lifespan was extended.

Sludge is thickened at the WWTF using gravity thickeners and a centrifuge. In 2019 as part of a WWTF improvement project, the original belt press dewatering process equipment was replaced with centrifuge dewatering process equipment. Conversion from belt press dewatering to centrifuge dewatering has improved the average dewatered sludge cake total solids content from a range of 19 percent to 23 percent with the belt press to a range of 25 percent to 30 percent with the centrifuge. Wet sludge requires addition of sand so that it is workable on the landfill. The drier sludge cake requires addition of less sand. Currently, the dewatering and hauling of the sludge cake occurs four days a week with two truckloads per day. Sludge is transported from the WWTF in Templeton to the landfill. At the landfill, the sludge is mixed with sand, dirt, and gravel to allow it to be easily spread and covered. The change to centrifuge dewatering has increase the expected lifespan of the landfill. It is now anticipated that capacity of the landfill would be reached between 2027 and 2030.²

PURPOSE AND NEED

The receipt and disposal of sludge at the landfill is a critical component of municipal wastewater treatment infrastructure which prevents raw sewage from contaminating local waters. The existing Sludge Landfill is anticipated to reach capacity between 2027 and 2030. Therefore, the aim of the Project is to increase the capacity of the Sludge Landfill to continue to accept sewage sludge from the City's WWTF.

Sludge placement in the landfill is anticipated to continue at the current rate based on population projections remaining constant for the next twenty years. There are no plans to expand the sewerage collection system that contributes to the sludge landfill, and there are no intentions to import sludge from other sources. Similar to the existing sludge landfill, inspections and monitoring of the landfill expansion will be performed in accordance with applicable regulations to control odor, dust, and vectors; however, with the Project, measures would be included to improve leachate collection, manage stormwater, and reduce erosion over existing conditions.

The City has been operating and consistently improving their WWTF to manage the waste stream generated from the citizens of the City of Gardner, Town of Ashburnham, and East Templeton. The operation of the WWTF has allowed the City to improve the conditions in the Otter River. One of the end products of the WWTF is sewage sludge, and the City is responsible for managing this waste. The City has been and continues to explore options that are feasible, permittable, and

² Lifespan projection is updated based on annual reporting. As of July 2024, the capacity of the landfill is anticipated to be reached between 2027 and 2030.

provide a cost-effective option. In evaluating options, the City is responsible for providing the service of managing the City's wastewater in a manner that works to maintain a reasonable cost especially in light of the fact that portions of the City are within state-designated "Environmental Justice" block groups with the criteria "Income."

PROJECT LOCATION

The Project Site is immediately West of the existing 9.7-acre Sludge Landfill and includes undeveloped City-owned property that is forested (see **Figures 1 and 2**). The Project Site is zoned Rural Residential (RR2). Municipal uses, defined by City Code Chapter 675 Zoning as "Facilities owned or operated by the City" are permitted within the RR2 zone.³ Although no formal easement has been found on record, the Esker Ridge Trail, as identified on the City of Gardner Parks, Open Space & Trails GIS Web App, traverses the Project Site (see **Figure 3**).⁴

With the Project, the existing sludge landfill site would be expanded to incorporate the 8.75-acre footprint of the sludge landfill expansion. The Project Site footprint would include the proposed groundwater protection system and disposal area, new leachate pumping system, force main, 12-foot-wide perimeter gravel access road and a stormwater management system consisting of a perimeter swale, bioretention area at the north end of the site and infiltration basins to the west and south.

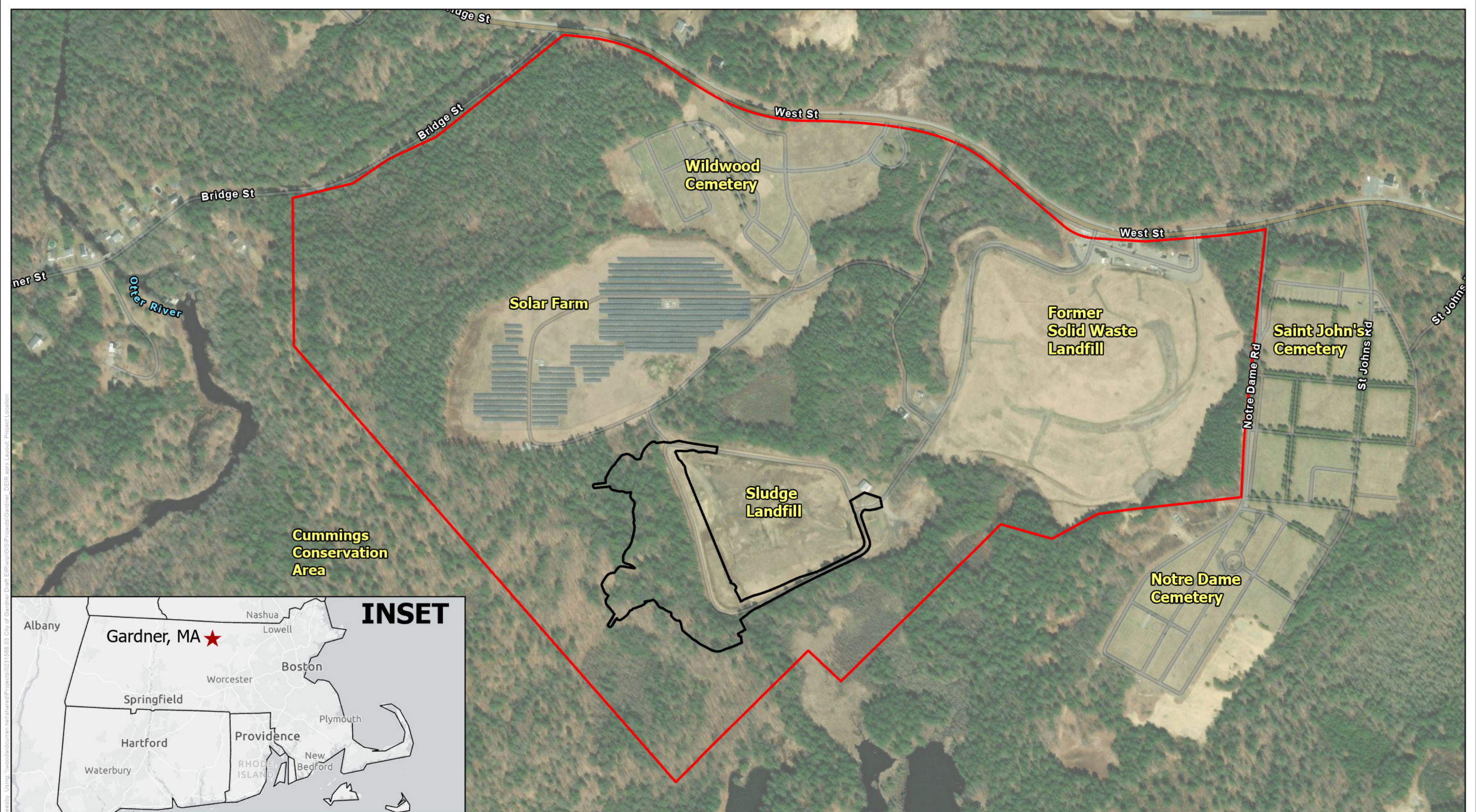
CHARACTERISTICS OF ENVIRONMENTAL JUSTICE POPULATIONS

As depicted on the Energy and Environmental Affairs Office of Environmental Justice and Equity environmental justice map viewer, there are 10 Block Groups identified as located in whole or in part within 5 miles of the Project Site (see **Figure 4**).⁵ Of these Block Groups in the City of Gardner, eight are identified as an Environmental Justice population based on the income criterion, one is identified as an Environmental Justice population based on the minority criterion, and one is identified as an Environmental Justice population based on both minority and income criteria (see **Table 1**).

³ City of Gardner, MA. *Zoning Map*. Retrieved from <https://gardner.maps.arcgis.com/home/index.html>.

⁴ City of Gardner, MA. *Parks, Open Space & Trails*. Retrieved from <https://gardner.maps.arcgis.com/home/index.html>.

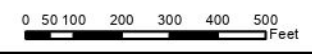
⁵ These data were obtained from <https://www.mass.gov/info-details/massgis-data-2020-environmental-justice-populations>.



Project Location
 City of Gardner, MA
 Gardner Sludge Landfill Expansion
 Worcester County, MA

Legend

- Project Area
- Project Site



Project #: 0231568.03
 Map Created: July 2024

Third Party GIS Disclaimer: This map is for reference and graphical purposes only and should not be relied upon by third parties for any legal decisions. Any reliance upon the map or data contained herein shall be at the users' sole risk. Data Sources: Woodard and Curran; MassGIS

Figure 1

Figure Exported: 12/13/2024, By: esneebay, Using: \\woodardcurran.net\shared\Projects\0231568.03 City of Gardner Draft EIR\wp\GIS\Projects\Gardner DEIR.aprx Layout: Project Location

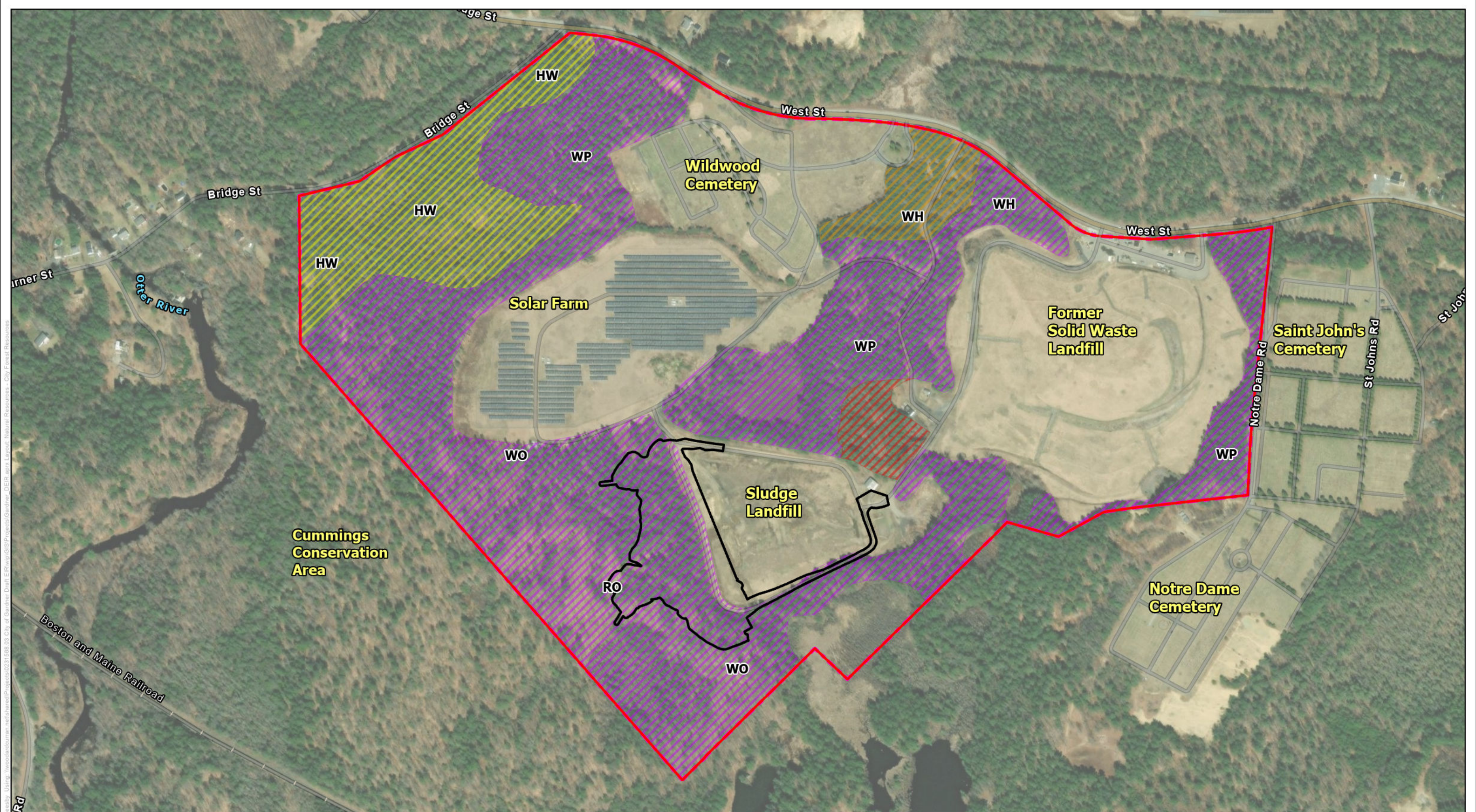


Figure Exported: 12/10/2024, By: esneasyby, Using: \\woodardcurran.net\shared\Projects\0231568.03 City of Gardner Draft EIR\wp\GIS\Projects\Gardner DEIR.aprx Layout: Natural Resources - City Forest Resources

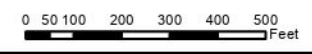

Natural Resources - City Forest Resources
 City of Gardner, MA
 Gardner Sludge Landfill Expansion
 Worcester County, MA

Legend

- Project Area
- Project Site

- Tree Stand Number**
- Stand 1
 - Stand 2
 - Stand 3
 - Stand 5

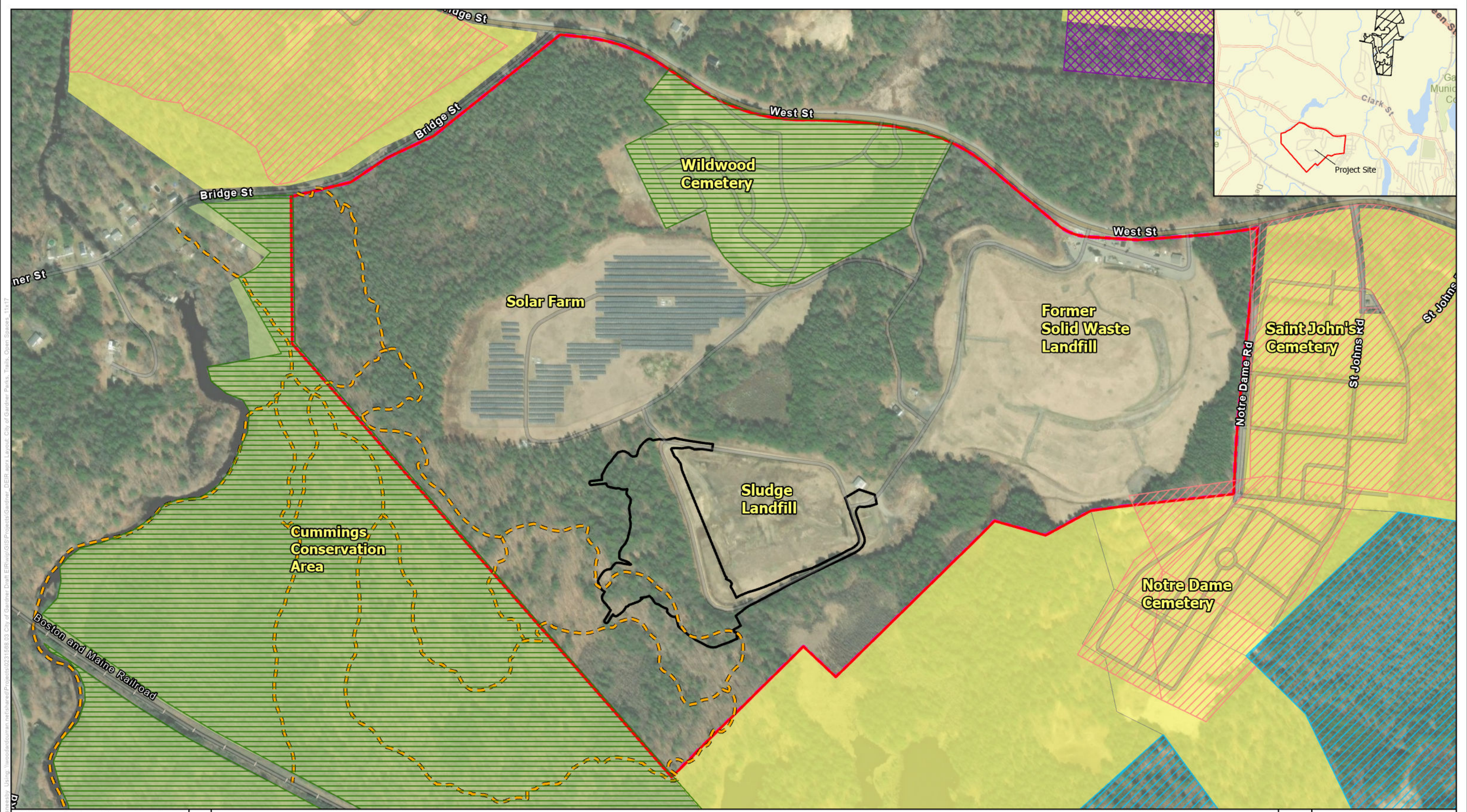
- Tree Types**
- WO = White Oak
 - RO = Red Oak
 - WP = White Pine
 - WH = White Pine Hardwood
 - HW = Hemlock White Pine

Project #: 0231568.03
 Map Created: July 2024

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Figure 2



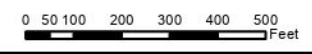
City of Gardner Parks, Trails, and Open Space
 City of Gardner, MA
 Gardner Sludge Landfill Expansion
 Worcester County, MA

Legend

	Project Area
	Project Site
	Trails
City of Gardner Open Space Ownership Records	
	Municipal
	Private

MA State Open Space Ownership Records

	Land Trust
	Municipal
	Private Non-Profit
	Private
	MA Open Space Legal Interest



Project #: 0231568.03
 Map Created: July 2024

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Figure 3

Figure Exported: 12/12/2024, By: esneashby, Using: \woodardcurran\net\shared\Projects\0231568.03 City of Gardner Draft EIR\wp\GIS\Projects\Gardner DEIR.aprx Layout, City of Gardner Parks, Trails, Open Spaces 11x17

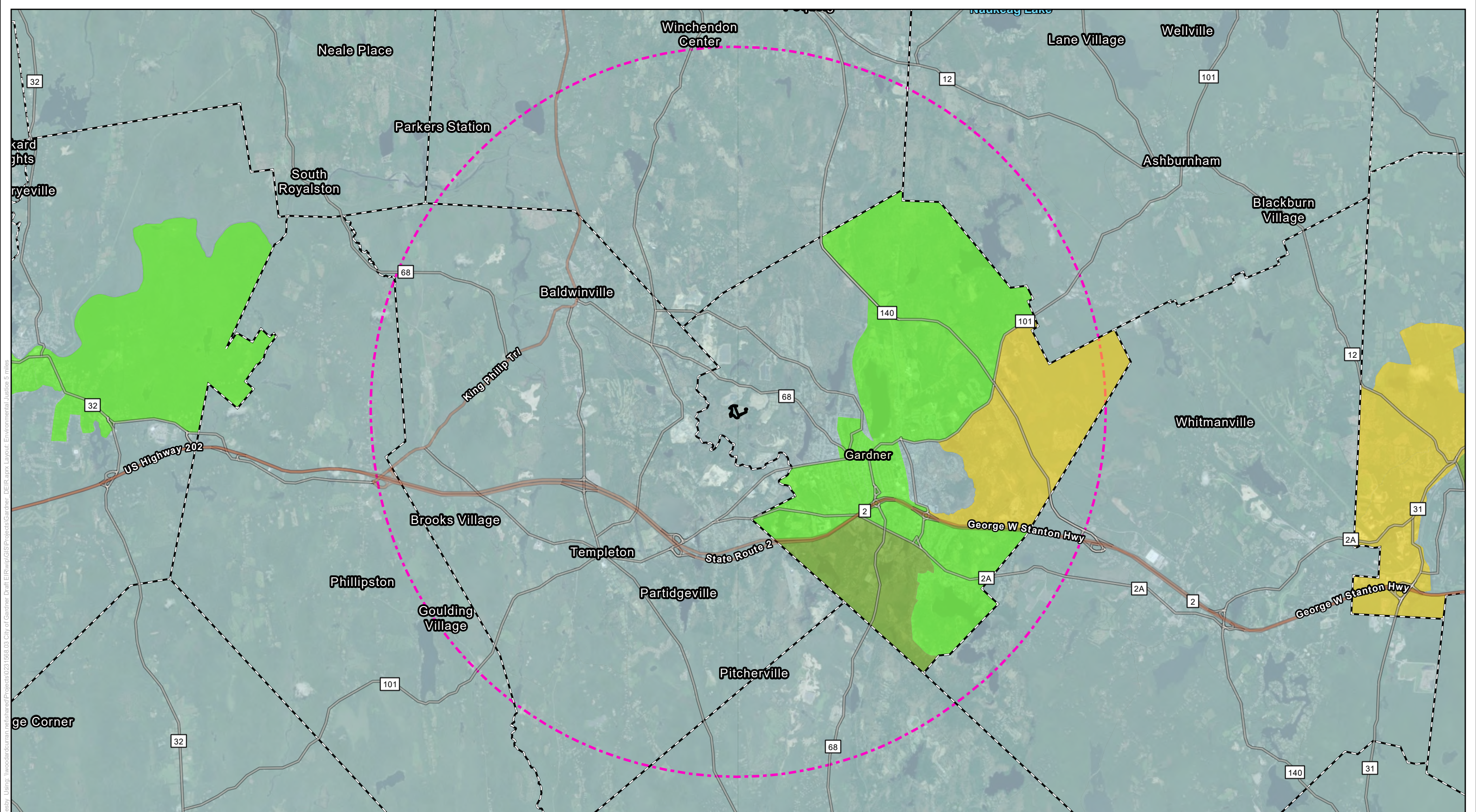
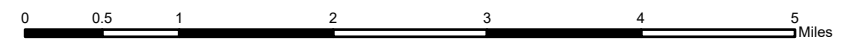


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**Massachusetts
2020 Environmental
Justice Populations**
City of Gardner, MA
Gardner Sludge Landfill Expansion
Worcester County, MA

Legend		2020 Environmental Justice Block Group Criteria	
	Project Site		Minority
	Surrounding Area (5 miles)		Income
	Municipal Boundaries		Minority and Income
			No Environmental Justice Concerns



Project #: 0231568.03
Map Created: August 2024

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Figure 4

Table 1: Environmental Justice Characteristics by Block Group of Populations within 5-miles of the Project Site

Block Group	Census Tract	Population	Households	Criterion ¹	Minority Population	Median Household Income	Households with Language Isolation
2	7074	1,196	586	Income	17%	\$50,074	0%
1	7075	2,053	781	Income	21%	\$49,097	4%
2	7072	1,125	595	Income	20%	\$30,947	7%
3	7073	1,059	535	Income	24%	\$38,994	0%
1	7073	1,168	545	Income	17%	\$30,972	4%
2	7073	1,829	843	Income	18%	\$36,219	1%
2	7075	2,123	524	Minority	35%	\$67,941	2%
1	7072	995	364	Income	23%	\$49,531	0%
2	7071	2,232	841	Income	16%	\$47,460	1%
1	7071	1,853	764	Minority and Income	28%	\$44,167	3%

Note: ¹For a population to be designated under the “income,” criterion, the annual median household income of a geographic area must be 65 percent or less of the statewide annual median household income. For a population to be designated under the “minority” criterion, minorities must make up 40 percent or more of the population. For a population to be designated under the “minority and income” criterion, minorities must make up 25 percent or more of the population and the annual median household income of the municipality in which the neighborhood is located does not exceed 150 percent of the statewide annual median household income.

There are no state-designated Environmental Justice Block Groups identified as located in whole or in part within one mile of the Project Site (see **Figure 5**).

Energy and Environmental Affairs Office of Environmental Justice and Equity’s languages spoken map does not identify languages spoken by 5 percent or more of the Environmental Justice population who also identify as not speaking English “very well.”

The Massachusetts Department of Public Health reports that Gardner meets the Vulnerable Health Environmental Justice criterion for heart attack, childhood blood lead, low birth weight, and childhood asthma.⁶

⁶ <https://matracking.ehs.state.ma.us/Environmental-Data/ej-vulnerable-health/environmental-justice.html>

POTENTIAL EFFECTS ON ENVIRONMENTAL JUSTICE POPULATIONS

MEPA protocols require additional consideration of effects on Environmental Justice Populations when they are within one mile of a project, or, when within 5 miles the project, would generate 150 or more new average daily trips of diesel traffic (excluding public transit trips) over a duration of one year or more (301 CMR 11.03(8)(b)). As there are no Environmental Justice populations within one mile of the Project Site (see **Figure 5**) and the Project does not introduce 150 average daily trips annually of diesel traffic, the Project is not reasonably likely to negatively affect Environmental Justice Populations located within the designated geographic areas around the Project Site. However, due to comments received during the MEPA review process on the Environmental Notification Form, further review of the Project's effects to Environmental Justice communities has been completed. The likely effects of the Project, along with the mitigation measures the Project will undertake to minimize, avoid, and mitigation these potential impacts, include the following:

- **Cost.** With the Project, the cost of sanitation services is likely to remain lower and exhibit more stability than with the Project's alternatives. Lower Project and sanitation service costs will collectively benefit Environmental Justice communities by prudently investing City funds to avoid long term rate increases or capital costs that would cause a greater effect on Environmental Justice communities. Therefore, the Project would not result in an increased or disproportionate effect on Environmental Justice Populations with respect to cost of sanitation services.
- **Air.** With the Project, there would be no new stationary sources and average daily trips of diesel vehicle traffic would remain unchanged. Therefore, the Project would not result in an increased or disproportionate effect on Environmental Justice Populations with respect to air emissions.
- **Traffic.** With the Project, there would be no increase in traffic or change in traffic patterns. Therefore, the Project would not result in an increased or disproportionate effect on Environmental Justice Populations with respect to traffic.
- **Odor.** With the Project, sludge landfill operations are not proposed to increase from existing operations and landfilling would continue at the same rate and quantity. Therefore, there would be no new air quality and/or odor impact with the implementation of the Project. Odors are proposed to continue to be managed through operational practices. In existing conditions, odor complaints are made sparingly (0 to 3 times per year), are generally made in the spring and fall seasons when weather conditions exacerbate odors and are generally made more frequently in closer proximity to the existing landfill. A seasonal odor issue with limited formal complaints that are made from locations in close proximity to the existing facility does not constitute a significant adverse impact with respect to odor. However, with the Project, mitigation measures are proposed. Odor is an inherent byproduct of any wastewater/wastewater residual operation and no technology (e.g., anaerobic digestion, incineration, composting, hydrothermal carbonization) offers an odorless alternative. To mitigate odors associated with the existing landfill, the Project would implement an interim cover and cap portions of the existing



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**Massachusetts
2020 Environmental
Justice Populations**
City of Gardner, MA
Gardner Sludge Landfill Expansion
Worcester County, MA

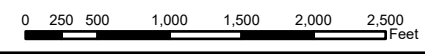
Legend

- Project Site
- Surrounding Area (1 mile)
- Municipal Boundaries

2020 Environmental Justice Block Group Criteria

- Income
- No Environmental Justice Concerns

Project #: 0231568.03
 Map Created: July 2024



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Figure 5

landfill no longer receiving sludge. It is anticipated that this would occur in Quarter 3 of 2028. Additionally, it is proposed that, with the Project, a new detailed complaint form would be implemented to ensure consistency of information collected and investigated to be included in future Annual Operations Reports. Furthermore, the Project will include a fact sheet on air quality and odors and its relationship to public health; information on the protocol for filing an odor complaint; information on sludge landfill operations and when the public is likely to experience odors from sludge handling activities; and an online survey on the City's website and advertised on the City's social media accounts. The survey will assist the City in determining if odors are emanating from the sludge landfill (and not other potential contributors of odor in the City) and if so if they are affecting state-designated Environmental Justice populations. Survey data will be tracked and mapped, helping the City gain a better understanding of existing odor concerns, and will inform changes in operational practices and future odor reduction projects pursued by the City. Finally, the City would continue to explore technologies that reduce odors and the feasibility of their implementation on a continual basis.

For questions regarding the City's Sludge Only Landfill or to report an odor complaint please contact VEOLIA at 978-630-8791 during normal business hours. After business hours, sludge landfill complaints can be reported by calling the non-emergency number for the Gardner Police Department dispatch at 978-632-5600 and leaving call back information and a brief description of the complaint. The complaint is forwarded to the appropriate on-call staff for follow-up. When reporting a complaint please provide the exact location and time of the complaint so VEOLIA operators can respond appropriately.

- **Land disturbance.** With the Project, approximately 8.75 acres of vacant municipal owned land that is forested would be disturbed to construct the Project. The Project Site has been considered for sludge landfill expansion and municipal use since the 1980s. While part of the Esker Ridge Trail goes beyond the Cummings Conservation Area boundaries onto the Project Site and would be removed to facilitate the Project, Environmental Justice populations would not be directly affected. Environmental Justice communities may be indirectly affected by loss of a section of trail; however, the effect is limited as the Project does not affect the Conservation Area that maintains the trails on its parcel and Environmental Justice communities would still have access to those trails. Therefore, there would be no significant adverse land disturbance effects to Environmental Justice Populations.
- **Stormwater.** With the proposed measures in-place (bioretention pond, infiltration basins, etc.), and regular maintenance of the stormwater features in accordance with the Massachusetts Stormwater Handbook to be outlined in the Project's Operation and Maintenance Plan, no stormwater effects are anticipated with the Project. Therefore, there would be no adverse stormwater effects to Environmental Justice Populations.
- **Groundwater.** The Project would be constructed with a double composite (a type of material where two layers of different composite materials are combined together) groundwater protection system with leak detection meeting the 310 CMR 19.110 standards for a solid waste landfill. As defined by 310 CMR 19.006, a groundwater

protection system is an engineered system that may include without limitation, liners, and barrier structures; leachate collection, storage, and disposal systems; drainage systems and/or other technologies intended to prevent the migration of leachate into and contamination of the groundwater. The groundwater protection system would be constructed on top of the subbase to act as a barrier to separate the applied sludge and any generated leachate from the groundwater resources beneath it. The groundwater protection system will consist of the following components, which will be installed in the order below (from the bottom of the liner in contact with the subbase to the top of the liner in contact with sludge/leachate):

- Low Permeability Layer - a low permeability layer will cover the subbase with one-foot of compacted low hydraulic conductivity soil, a geosynthetic clay liner, and a high-density polyethylene geomembrane;
- Leak Detection and Secondary Leachate Collection System - a leak detection and secondary leachate collection system would be installed over the low permeability layer;
- Primary Low Permeability Layer - a primary low permeability layer with a geosynthetic clay liner and high-density polyethylene geomembrane would be installed to cover the leak detection and secondary leachate collection system;
- Primary Leachate Collection System - a primary leachate collection system would be installed over the primary low permeability layer; and
- A one-foot layer of sandy soil material and stone would be installed over the primary leachate collection system to protect the underlying components of the GWPS. Once operational, sludge would be placed on top of this layer.

Similar to existing conditions, leachate produced by the Project would be directed to the City's existing sewerage collection system. As defined by Federal regulation 40 CFR 257.2, leachate is a liquid that has passed through or emerged from solid waste and contains soluble, suspended, or miscible materials removed from such waste. A 15,000 square foot portion at the southernmost and lowest end of Cell One will be used as a detention area to which leachate from the remainder of Cell One and Cells Two and Three will be directed. Leachate will be pumped out of the landfill and into the existing leachate conveyance system. From there, the leachate pump station delivers it to a gravity sewer main in West Street where it can flow to the existing WWTF for treatment. The leachate collection and conveyance system for the Project was designed to accommodate precipitation that would become leachate under worst case extreme storm conditions.

Anticipated changes to groundwater flow within the Project Site post-construction are expected to be minimal. Groundwater elevations appear slightly elevated in the Project Site compared with pre-construction modeling and the effects of the planned stormwater ponds on the water table are expected to be minimal. With the Project, monitoring wells CDR-1, CDR-4, and CDR-6/6A would need to be decommissioned. Based on hydrogeologic modeling, the proposed groundwater protection system and the implementation of the monitoring and sampling plan, impacts to groundwater are not

anticipated with this Project. Therefore, there would be no adverse groundwater effects to Environmental Justice Populations. To ensure the protection of groundwater resources, two additional monitoring wells are proposed to be installed. An additional monitoring well, designated SL-4, will be installed upgradient of the landfill near the north entrance road at the southern edge of the solar field that will exhibit background groundwater characteristics; and an additional downgradient monitoring location (CDR-5) is proposed to assist with evaluating potential effects on groundwater from the Project. To further protect groundwater resources, the environmental monitoring and reporting would include these two additional monitoring wells.

- **Construction.** The Project Site is located in a sparsely populated area and away from potential sensitive receptors. Construction vehicles would enter the Project Area from West Street and construction activities are expected to take place within the Project Site. Therefore, the construction period effects would be minimal to unnoticeable.

The following measures would be implemented to control construction-related noise:

- Using appropriate mufflers on all equipment and ongoing maintenance of intake and exhaust mufflers;
- Muffling enclosures on continuously running equipment;
- Replacing specific construction operations and techniques with less noise-producing ones, where feasible;
- Selecting the quietest of alternative items of equipment, where feasible;
- Scheduling equipment operations to keep average noise levels low, to synchronize the noisiest operations with times of highest ambient levels, and to maintain relatively uniform noise levels; and
- Turning off idling equipment.

The following measures would be implemented to minimize dust:

- Using wetting agents on areas of exposed soil on a scheduled basis;
- Using covered trucks;
- Using stone aprons to clean the tires of construction vehicles entering and exiting the Project Site;
- Minimizing spills on the construction site;
- Monitoring of construction practices to reduce unnecessary transfers;
- Minimizing mechanical disturbances of loose materials;
- Minimizing storage of debris on the construction site; and
- Periodic street and sidewalk cleaning with water to minimize dust accumulations.

To prevent the tracking of Project Site soil into the public roadways, a stabilized construction entrance shall be established, such that the tires of each vehicle exiting the Project Site are free of soil and dust that could be tracked into the street or otherwise mobilized. All truck tires and equipment would be cleaned as necessary prior to leaving

the Project Site. If necessary, additional measures such as a tire wash area may be necessary to achieve the performance objectives.

To protect water quality, the Project would comply with the specifications and conditions set for in the Order of Conditions. A Stormwater Pollution Prevention Plan would be prepared in accordance with U.S. Environmental Protection Agency's (EPA) National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Pursuant to 40 CFR 450.21, the EPA establishes minimum NPDES effluent limitations. The City and its selected Contractor would comply with these requirements, which include:

- Design, install, and maintain effective erosion and sediment controls, and pollution prevention measures, to minimize the discharge of pollutants;
- Stabilize disturbed areas immediately when construction has ceased and would not resume for more than 14 days;
- Prohibit the dewatering discharges unless managed by appropriate controls;
- Prohibit the discharge of:
 - Wastewater from concrete washout (unless managed by appropriate control), or washout/cleanout of stucco, paint, form release oils, other wastewater materials;
 - Fuels, oils, or other pollutants used for vehicles; and
 - Soaps or solvents to wash vehicles and equipment.

Erosion and sediment controls would be installed by the selected Contractor as required by and shown on the final design drawings to prevent erosion, sedimentation, and the discharge of other pollutants during construction and other land disturbing activities. These measures would be maintained and kept in place until the disturbed areas of the Project Site have fully stabilized.

With the proposed construction-related mitigation measures, no construction related impacts to Environmental Justice Communities are anticipated with the Project.

MEASURES TO ENHANCE PUBLIC INVOLVEMENT

Activities undertaken to involve the public serve the following objectives:

- to provide clear and transparent information to the public about Project impacts and associated mitigation measures, with particular consideration of Environmental Justice communities potentially facing existing unfair or inequitable environmental burdens;
- to provide opportunities for public involvement;
- to solicit concerns from the public; and
- change/adjust the Project to address public concerns as appropriate and feasible.

Public outreach will include information and discussions around topics such as project need,

project benefit, project costs, odor control, and potential environmental impacts.

To meet each of these objectives, the City proposes to undertake specific activities as described below.

Informing the Public

The City understands the importance of public participation for the Project. During the course of the DEIR preparation process, this Public Involvement Plan outlines the specific steps anticipated to engage with the public and the project stakeholders.

The City will provide Project information to the public by establishing an electronic information repository; establishing repositories for hard copy access of presentation materials and the DEIR, once available; hosting public information meeting(s); and developing and maintaining a Project emailing list to distribute Project updates and the DEIR, once available. Efforts to notify the public of the public information meeting in advance of noticing requirements will be made.

All materials and information regarding Project will be written and/or spoken in a way that is understandable to the public. The City will make its best effort to avoid jargon or overly technical language and utilize clear visuals to convey more complex aspects of the Project.

Audience Identification

A critical step in successful outreach is understanding the audiences to whom the City will be communicating. The following are types of audiences the City anticipates communicating with:

- Environmental Justice communities (described above);
- Petitioners;
- Interested residents;
- Site abutters;
- Municipal officials (staff and elected);
- State officials (staff and elected);
- Regulatory agencies; and/or
- General public.

It is important to note that stakeholders could fit into multiple audience types or could change audience type based on timing, key issues, current events, or other factors.

It is similarly important to note that special consideration will be given to engaging environmental justice communities including targeted outreach, community involvement, and special meetings.

To evaluate the presence of limited English proficiency populations, The City referred to the Energy and Environmental Affairs Environmental Justice Maps viewer. There are no languages other than English that are spoken by 5 percent or more of residents within five miles of the Project Site. If updates on the Energy and Environmental Affairs Environmental Justice Maps results in the identification of language(s) spoken by 5 percent or more of residents within one mile of the Project Site, the need for interpretation and translation services will be reevaluated

and updated in the Draft PIP.

The City has acquired an Environmental Justice Reference List from MEPA (**Attachment 1**) and will make every effort to engage with pre-existing groups on this list to identify Environmental Justice outreach strategies and disseminate information about the Project. Additionally, the City will disseminate information in commonly visited areas such as libraries and community centers for those who do not have internet access.

COMMUNITY OUTREACH AND ENGAGEMENT

Public Involvement History

The following is a list of public involvement opportunities that have occurred:

- January 18, 2024 – Public presentation on Alternative 2, Hydrothermal Carbonization Study by SoMax, hosted by Gardner Clean Air at West End Beagle Club, Gardner, MA.
- December 19, 2023 – Presentation by Fitchburg’s City Engineer to Fitchburg City Council on Alternative 1, planned Biosolids Management Facility
- April 3, 2023 – MassDEP site visit scheduled for Appeal of the Gardner Conservation Commissions Order of Conditions approved in November 2022.
- January 17, 2023 – MEPA site visit conducted with attendance from members of the public. Concerns raised during the site visit included the potential for landfill liner leakage, contamination of drinking water wells, and the City’s limited consideration of alternatives.
- December 23, 2022 – The City of Gardner submits an Environmental Notification Form, which was posted in the December 23, 2022 Environmental Monitor, starting a 20-day public comment period for the MEPA review process. Public comments were due January 12, 2022. The review period was subsequently extended to January 31, 2023, allowing additional time for public comment.
- November 14, 2022 – Gardner Conservation Commission issued Order of Conditions.
- October 24, 2022 – Third Conservation Commission Public Hearing
- August 22, 2022 – Second Conservation Commission Public Hearing (held in person and via Zoom)
- July 25, 2022 – First Conservation Commission Public Hearing
- October 17, 2016 – Public Hearing for New/Expanded Sludge Landfill held in the City Council Chamber, Room 219, City Hall, 95 Pleasant Street, Gardner, Massachusetts. Electronic flyers were also distributed to the Town of Templeton.
- October 6, 2016 – Notice of public hearing for new/expanded sludge landfill. Notice was given that the City Council would conduct a Public Hearing on Monday, October 17, 2016, at 6:00 PM in the City Council Chamber, Room 219, City Hall.
- September 16, 2016 – Informal Meeting of the City Council was held in the City Council Chamber Room, Room 219, City Hall. A presentation was given by CDR Maguire, Inc. on the history and future of sludge disposal in the City of Gardner, including wastewater

treatment development background and recent activities, a summary of the evaluation completed for new WWTF dewatering technology, and a review of alternatives for disposing sludge

- October 5, 1983 – Public Hearing for Industrial Pretreatment Program and Sludge Disposal Site Evaluation and Management Program

Proposed Community Outreach and Engagement

Public Information Meeting

The City will brief the public about Project milestones during public information meeting(s) to provide Project information, allow for questions, collect emails for future information distribution, and distribute printed materials.

A public information meeting will be held on February 10, 2025, from 6pm-8pm at 95 Pleasant Street, Room 121, Gardner, MA 01440. The City will provide a presentation that explains the Project and provide ample time for public input.

The City will distribute information at least 14 days in advance of public information meeting(s) to the local media, as well as posting notices online. Further, the City will send notices announcing the public information meeting to individuals on the email list and those listed in **Attachments 1 and 2** of this Draft PIP. Notice of the public meeting will also be posted physically in libraries, churches, senior centers, community centers, and other frequently visited areas to reach audiences without technological access or limited technology literacy.

To accommodate Environmental Justice communities, the City will:

- Ensure the public information meeting time is selected to maximize participation from Environmental Justice populations (such as scheduling during evening hours or over the weekend);
- Ensure that the public information meeting location is Americans with Disabilities Act accessible;
- Ensure the public information meeting location is accessible via public transportation; and
- Record and publish the meeting to provide virtual access.

During public information meeting(s), interested parties will have the opportunity to hear a presentation, ask questions and provide comments. Meeting recordings will be posted to the online repository for public review. Comments heard at the public information meeting will be noted and will be appended to the DEIR along with an explanation of how comments were addressed.

The need for additional public information meetings to discuss general or specific aspects of the Project, or with the goal of reaching particular Environmental Justice populations ahead of subsequent EIR filings will be assessed through feedback from community members and at the direction of the Secretary.

Webpage Content and Social Media

The City will update as necessary their webpage for the Project. The webpage is located at the

following link: <https://www.gardner-ma.gov/1276/Sludge-Landfill-Expansion>. The website will serve as the public repository for all documents related to the Project. The website will additionally allow a "Contact Us" function to submit questions. Alternatively, the public may email slf@gardner-ma.gov. Interested parties will be able to sign up for the email distribution list (**Attachment 1**) on the webpage.

Social media will be used to publicize the public information meeting and provide updates such as new Project information being posted to the webpage.

Materials Development

The City will prepare the following printed materials for information distribution to the public. In the event that materials need to be targeted to specific audiences, multiple versions may be created:

- Project summary;
- Fact sheets;
- Frequently Asked Questions; and
- Presentations for meetings.

These materials will be distributed as information becomes available and is appropriate to share. For instance, Project summaries and presentations will be prepared and posted to the Project website following the public information meeting. Materials may require updates and new materials will be created as necessary to provide the public with updated information.

A fact sheet, using the MassDEP permitting template describing the Project, has been developed and is currently on the City's website. This fact sheet will be updated as appropriate and distributed by the City to the appropriate local distribution outlets prior to the issuance of a draft permit.

Information Repositories

The City will establish and maintain a local online information repository to provide the community with access to information about the Project. Information will be added to the repository as it is developed. The information repository for the City of Gardner Sludge Landfill Expansion is available at <https://www.gardner-ma.gov/1276/Sludge-Landfill-Expansion>

The City will also establish and maintain a physical information repository. Information will be added to the repository as it is developed. The physical information repository for the City of Gardner Sludge Landfill Expansion is located at City Hall 95 Pleasant Street, Gardner, MA 01440. Additionally, a physical information repository will be at the Levi Heywood Memorial Library, located at 55 West Lynde Street, Gardner, MA 01440.

Email and Mailing Distribution List

The City will maintain an email distribution list of interested parties who have internet access for the Project. Interested parties will have the ability to sign up for the email list via the City website. The email distribution list will be used to announce upcoming public information meetings, distribute fact sheets, provide notices of public comment periods on, the availability of documents

in online and physical information repositories, and any other updates about the Project.

The City has acquired an Environmental Justice Reference List from MEPA and will look to engage with pre-existing groups on this list to identify Environmental Justice outreach strategies and disseminate information about the project. In addition to the Environmental Justice references provided by MEPA, additional community-based organizations were identified through public comments on the Environmental Notification Form (see **Attachment 1**). Those community-based organizations have been included in the distribution list and included in the circulation list for the DEIR (**Attachment 2**).

The City will maintain the mailing list and update it as necessary. The City will provide MassDEP with a copy of the mailing list. Anyone wishing to be added to the mailing list can subscribe on the website <https://www.gardner-ma.gov/1276/Sludge-Landfill-Expansion>.

Response to Comments

As part of the DEIR, the City will include responses to comments made on the Environmental Notification Form. The DEIR is anticipated to be filed in early 2025. Upon receiving the DEIR, the MEPA Secretary shall publish the notice of the availability of the EIR in the next *Environmental Monitor* in accordance with 301 CMR 11.52(2), which begins the DEIR review period. The EIR review period lasts for 37 days. The public can comment on the DEIR through the *Environmental Monitor* website, found here: <https://eeaonline.eea.state.ma.us/EEA/MEPA-eMonitor/home>.

Pre-filing Consultation

As discussed above, through the development of the Draft PIP, the City has consulted with the Energy and Environmental Affairs Office of Environmental Justice and Equity and the MEPA Office regarding community engagement strategies appropriate for the Project on October 3, 2023, March 16, 2024, and July 18, 2024.

Public Involvement Requirements After Filing

As discussed above, the Draft PIP is a living document intended to be updated to reflect ongoing community outreach and engagement through the Project's environmental review and permitting process. The Draft PIP will serve as a guiding document through the MassDEP permit application process for the Project.

SCHEDULE FOR PUBLIC INVOLVEMENT ACTIVITIES

It is anticipated that the DEIR will be filed with MEPA in early 2025.

The City of Gardner will circulate copies of the DEIR and offer one-on-one meetings with members of the public to field questions about the document. The City is prepared to host an additional public meeting prior to the submittal of the FEIR and pursuant to the best practices outlined in this PIP, depending on the requirement set forth in the DEIR certificate. Efforts towards meaningful public engagement will continue throughout the MEPA review process and subsequent agency approvals.

REVISIONS TO THE PUBLIC INVOLVEMENT PLAN

This Draft PIP is intended to be a living document and may be revised as necessary during the

course of the Project. If revisions are proposed, the City will add the proposed changes to the online information repository and will send a notice of the availability of recommended changes to the email list. The draft PIP will be appended to the DEIR when filed with MEPA; however, will continue to be utilized and updated through the MassDEP permit approval process.

DRAFT

ATTACHMENT 1

Statewide Environmental Justice Community Based Organizations (Environmental Justice Reference List)					
First Name	Last Name	Title	Phone	Email	Affiliation
Claire	B.W. Muller	Movement Building Director	(508) 308-9261	claire@uumassaction.org	Unitarian Universalist Mass Action Network
Julia	Blatt	Executive Director	(617) 714-4272	juliablatt@massriversalliance.org	Mass Rivers Alliance
Jodi	Valenta	Massachusetts State Director	(617) 367-6200	Jodi.Valenta@tpl.org	The Trust for Public Land
Kerry	Bowie	Board President	Not Provided	kerry@msaadapartners.com	Browning the GreenSpace
Sylvia	Broude	Executive Director	(617) 292-4821	sylvia@communityactionworks.org	Community Action Works
Heather	Clish	Director of Conservation & Recreation Policy	(617) 523-0655	hclish@outdoors.org	Appalachian Mountain Club
Brittney	Jenkins	Vice President	(617) 850-1761	Bjenkins@clf.org	Conservation Law Foundation
Ben	Hellerstein	MA State Director	(617) 747-4368	ben@environmentmassachusetts.org	Environment Massachusetts
Robb	Johnson	Executive Director	(978) 443-2233	robb@massland.org	Mass Land Trust Coalition
Cindy	Luppi	New England Director	(617) 338-8131 x208	cluppi@cleanwater.org	Clean Water Action
			(508) 505-6748	info@n2nma.org	Neighbor to Neighbor

Statewide Environmental Justice Community Based Organizations (Environmental Justice Reference List)

First Name	Last Name	Title	Phone	Email	Affiliation
Rob	Moir	Executive Director	Not Provided	rob@oceanriver.org	Ocean River Institute
Vickash	Mohanka	Director, MA Chapter	(617) 423-5775	Vick.mohanka@sierraclub.org	Sierra Club MA
Heidi	Ricci	Director of Policy	Not Provided	hricci@massaudubon.org	Mass Audubon

Local Community Based Organizations

David	Brule	President	(978) 248-9491	watershed@millersriver.net	Millers River Watershed Council
Alan	Rousseau	Executive Director	(978) 618-5755	rousseaua@verizon.net	Gardner Clean Air
Rebecca	Todd	Executive Director	(413) 772-2020	crc@ctriver.org	Connecticut River Conservancy
John	Driscoll	General Manager	(978) 939-5323, x11	jdriscoll@templetonlight.com	Town of Templeton Light and Water Department

ATTACHMENT 2
DEIR Circulation List (Draft)

<p>Massachusetts Environmental Policy Act (MEPA) Office 100 Cambridge Street, Suite 900 Boston, MA 02144 MEPA@mass.gov</p>	<p>Massachusetts Department of Transportation District #3 Attn: MEPA Coordinator 499 Plantation Parkway Worcester, MA 01605 Jeffrey.r.gomes@dot.state.ma.us</p>
<p>Massachusetts Environmental Policy Act (MEPA) Office Attn: EEA Environmental Justice Director 100 Cambridge Street, Suite 900 Boston, MA 02144 MEPA-EJ@mass.gov</p>	<p>Massachusetts Historical Commission The MA Archives Building 220 Morrissey Boulevard Boston, MA 02125 mhc@sec.state.ma.us</p>
<p>Massachusetts Department of Environmental Protection Central Regional Office Attn: MEPA Coordinator 8 New Bond Street Worcester, MA 01606 Andrea.briggs@mass.gov</p>	<p>Montachusett Regional Planning Commission (MRPC) 464 Abbott Avenue Leominster, MA 01453 mrpc@mrpc.org</p>
<p>Massachusetts Department of Environmental Protection Residuals Management Program Attn: Jennifer Wood, Residuals Statewide Coordinator One Winter Street Boston, MA 02108 Jennifer.wood@state.ma.us</p>	<p>Gardner City Council George Tyros, President 95 Pleasant Street, Room 121 Gardner, MA 01440 gtyros@gardner-ma.gov tsiriphan@gardner-ma.gov</p>
<p>Massachusetts Department of Transportation Public/Private Development Unit 10 Park Plaza, Suite 4150 Boston, MA 02116 MassDOTPPDU@dot.state.ma.us</p>	<p>Gardner Community Development & Planning Manca Annex 115 Pleasant Street, Room 201 Gardner, MA 01440 jstevens@gardner-ma.gov</p>
<p>Gardner Conservation Commission Manca Annex 115 Pleasant Street, Room 201 Gardner, MA 01440 jenright@gardner-ma.gov</p>	<p>Polish American Citizens Club 171 Kendall Pond Rd W Gardner, MA 01440 paccinfo@comcast.net</p>

Gardner Health Department 95 Pleasant Street, Room 29 Gardner, MA 01440 mblondeau@gardner-ma.gov	American Legion Post #129 22 Elm Street, PO Box 1092 Gardner, MA 01440 royalcadet@comcast.net
Levi Heywood Memorial Library 55 West Lynde Street Gardner, MA 01440 syoung@cwmars.org	Fraternal Order of Eagles 71 City Hall Avenue Gardner, MA 01440 help@foe.com
Natural Heritage and Endangered Species Program Massachusetts Division of Fisheries & Wildlife 1 Rabbit Hill Road Westborough, MA 01581 melany.cheeseman@mass.gov Emily.holt@mass.gov	Gardner Rotary Club mellis0144@comcast.net
Massachusetts Department of Public Health 250 Washington Street Boston, MA 02108 https://www.mass.gov/forms/contact-dph-by-web-form	Gardner Lions Club 184 Pearson Blvd. Gardner, MA 01440 Gardnerlionsclub@gmail.com
Millers River Watershed Council Attn: David Brule, President Millers River Environmental Center 100 Main Street Athol, MA 01331 (978) 248-9491 watershed@millersriver.net	Bethany Baptist Church 72 Ryan Street Gardner, MA 01440 office@bethanygardner.org
Alan Rousseau 211 Betty Spring Road Gardner, MA 01440 Rousseaua@verizon.net	Jehovah's Witnesses Kingdom Hall 1071 West Street Gardner, MA 01440 (603) 899-2700 No email available.
Annunciation Parish 135 Nichols Street Gardner, MA 01440 Rev. Sierra (Pastor): pastor@annunciationgardner.org William Lawton (Business Manager): BusinessManager@AnnunciationGardner.org Deb McGonigal (Secretary): deb@annunciationgardner.org	Gardner Trout Club 44 Watkins Road Gardner, MA 01440 No email available.

<p>Otter River Sportsman's Club PO Box 28 Baldwinville, MA 01436 orscmailbox@gmail.com</p>	<p>Gardner Fish & Gun Club PO Box 396 Gardner, MA 01440 (978) 632-9774 No email available.</p>
<p>West End Beagle Club 110 Clark Street Gardner, MA 01440 (978) 632-9792 No email available.</p>	<p>St. John's Cemetery West Street Gardner, MA 01440 George DiLorenzo, Director of Cemeteries: georged@stjcemetery.com</p>
<p>Wildwood Cemetery West Street Gardner, MA 01440 (978) 630-4003 No email available.</p>	<p>Town of Templeton: Board of Assessors Attn: Justice J.H. Graves 160 Patriots Road, P.O. Box 620 East Templeton, MA 01438 (978) 894-2760 jgraves@templetonma.gov</p>
<p>Town of Templeton: Conservation Commission/Community Preservation Committee/Planning Board Attn: Jessica Case 160 Patriots Road, P.O. Box 620 East Templeton, MA 01438 (978) 894-2767 jcase@templetonma.gov</p>	<p>Town of Templeton: Development Services Attn: Richard Hanks 160 Patriots Road, P.O. Box 620 East Templeton, MA 01438 (978) 894-2770 rhanks@templetonma.gov</p>
<p>Town of Templeton: Light and Water Department Attn: John Driscoll, General Manager 86 Bridge St P.O. Box 20 Baldwinville, MA 01436 978-939-5323, x11 jdriscoll@templetonlight.com</p>	<p>Town of Templeton: Office of Public Services Attn: Bob Szocik Highway Barn 381 Baldwinville Road Templeton, MA 01468 (978) 939-8666 bszocik@templetonma.gov</p>
<p>Town of Templeton: Town Administrator Attn: Adam Lamontagne 160 Patriots Road, P.O. Box 620 East Templeton, MA 01438 (978) 894-2755 alamontagne@templetonma.gov</p>	<p>Greater Gardner Chamber of Commerce 31 Lake Street, Suite 151 P.O. Box 1381 Gardner, MA 01440-6381 chamber@gardnerma.com</p>
<p>Gardner Clean Air (978) 618-5755 rousseau@verizon.net</p>	<p>Connecticut River Conservancy Attn: Rebecca Todd, Executive Director 15 Bank Row Greenfield, MA 01301 (413) 772-2020 crc@ctriver.org</p>

Environmental Notification Form Commenters	
<p>Bob Chicoine 300 Clark Street Gardner, MA 01440 978-410-4044 bobchic1s@aim.com</p>	<p>David K Peabody 3 Jackson Park Gardner, MA 01440 508-479-5278 david.peabody@verizon.net</p>
<p>Adam Lamontagne 160 Patriots Road East Templeton, MA 01438 alamontage@templetonma.gov</p>	<p>Josh Forgues 104 Ryan Street Gardner, MA 01440 Underpantgnome83@yahoo.com</p>
<p>Jeffrey W Lore 19 Watkins Road Gardner, MA 01440 evangelistjefflore@hotmail.com</p>	<p>Cheryl Alvarez Templeton, MA (No street address available) No phone number available cherylalvarez1979@gmail.com</p>
<p>Taylor Sala Templeton, MA (No street address available) No phone number available taylor.sala2021@gmail.com</p>	<p>Kelsey Coates Templeton, MA (No street address available) No phone number available kcoates978@gmail.com</p>
<p>David Antaya 444 Stone Street Gardner, MA 01440 978-630-2811 dantaya@fitchburgstate.edu</p>	<p>David Legere 10 Turner Road Baldwinville, MA No phone number available Legere3161@aol.com</p>
<p>Mike Wilczynski No address available Certified Professional Geologist 248-318-4732 Pangea52@yahoo.com</p>	<p>Jennifer M Albertine Climate and Land Justice Specialist, Conservation and Stewardship Associate Mount Grace Land Conservation Trust No address or phone available council@millersriver.net</p>
<p>Gardner Clean Air Ala Rousseau Sean Rousseau 211 Betty Spring Road Gardner, MA 01440 No email or phone available</p>	<p>Mary E Marsh 150 Acadia Road Gardner, MA 01440 508-619-9882 Mary.marsh@shutr.net</p>
<p>Theresa Griffis 12 Drury Lane Templeton, MA 01468 978-939-7370 t.griffis@gmail.com</p>	<p>Thomas B Esposito 20 Becky Ave Gardner, MA 01440 No phone available tbrag_8@yahoo.com</p>

Kelsey Wentling River Steward Connecticut River Conservancy 413-772-2020 x216 kwentling@ctriver.org	Jo-Anne Burdin 299 Royalston Rd Baldwinville, MA 01436 No phone available jo0@verizon.net
Ivan Ussach MRWC Director No address available 413-773-3830 ivan@millersriver.net	Tim Gurczak 143 Vernon Street Gardner, MA 01440 Timgurczak@gmail.com
Erin Kiewel MA 01440 (No street address provided) 978-660-6170 Erin.kiewel@gmail.com	cortkiewel@gmail.com (Only email provided)
Hugh Jardon No phone or address available Markmonahan4gardner@gmail.com Note: email as provided is not valid.	Lealdon Langley Director, MassDEP No phone available lealdon.langley@mass.gov
Paul DeMeo 9 Willis Road Gardner, MA 01440 ryanrealty@comcast.net	Rice Flanders Vice President, MRWC Board of Directors No address or phone available riceflanders@hotmail.com
Vicki Heidorn 12 Crystal Lake Dr Gardner, MA 01440 978-895-6115 surroundingsgallery@gmail.com	
Private Well Owners (approximate address)	
38 Turner Street, Baldwinville, MA 01436	184 Main Street, Baldwinville, MA 01436
137 Depot Road, Templeton, MA 01468	111 Depot Road, Templeton, MA 01468
217 Riverside Road, Gardner, MA 01440	20 Nyman Road, Templeton, MA 01440
23 Riverside Road, Templeton, MA 01440	248 Gardner Road, Templeton, MA 01440
254 Gardner Road, Templeton, MA 01440	146 Princeton Street, Gardner, MA 01440
115 Princeton Street, Gardner, MA 01440	84 Keyes Road, Gardner, MA 01440
36 Watkins Street, Gardner, MA 01440	27 Suomi Road, Gardner, MA 01440
370 Clark Street, Gardner, MA 01440	929 West Street, Gardner, MA 01440
14 Sand Road, Baldwinville, MA 01436	