Bois, Bob

From: Monnelly, Anne (DCR) [Anne.Monnelly@state.ma.us]
Sent: Tuesday, March 31, 2009 3:34 PM
To: White, Jim
Cc: GNSmith@aquaticcontroltech.com; Bois, Bob
Subject: RE: Well Information

Jim,

Per your request I respectfully submit the following information.
Please do not hesitate to call if you have questions or require additional information.

Given the rigorous testing that diquat has undergone during reviews conducted by the USEPA, various state environmental agencies (including MA DEP and MA Department of Agricultural Resources, Pesticide Board) and the manufacturer's required testing during the product registration process, there has not been much field well testing needed or required following lake treatments. That being said, some well monitoring has been required for certain projects, and these data are reviewed below per your request. Although it's near impossible to say that any such available testing matches the Natick scenario exactly, it is fair to point out that the vast majority of wells in Massachusetts and New England are located in sand and gravel aquifers and therefore it is expected that the conditions of most of the wells discussed below are similar to those at Lake Cochituate.

Referring to the hand-out on Reward provided to the Conservation Commission and the Board of Health, the last bullet on Page 2 describes testing data compiled by the New Hampshire Division of Pesticide Control (DPC). During 2000-2007, over 46 wells with a wide range of specifications were tested for diquat post-treatment. In most cases, these treatments were performed with no required setback to shorelines with adjacent wells. Diquat was not detected in any of the samples.
More specific information on the wells is not available, without traveling to the NH state offices and seeking permission to go through their treatment and well monitoring records, if such permission were
even to be granted. We'd encourage the Natick BOH to call Mr. Bob
Wolff from the NH DPC @ 603-271-3695 for more information. We've spoken with Mr. Wolff and he is agreeable to speaking with officials from the Conservation Commission and/or the BOH.

Testing was also conducted at Bantam Lake in CT. The CT Department of Health required the monitoring of four public wells (one of which was within 100-feet of the treatment area). Samples were collected from these wells approximately one month following treatment each year of the treatment program (2006-2008). Again, diquat was not detected in any of these samples.

Monitoring has also been conducted at two other lakes that we know of:
Lake Shirley in Lunenburg/Shirley, MA and Congamond Lake in Southwick, MA. Again, no diquat was found to have contaminated nearby wells.

There is plainly a wealth of both theoretical and field evidence that supports the findings of EPA and the MA agencies, that there is not a significant risk of well contamination due to lake treatments with Diquat, when applied in accordance with the product label.

Anne Monnelly
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