



*The Commonwealth of Massachusetts*  
*Executive Office of Energy and Environmental Affairs*  
*100 Cambridge Street, Suite 900*  
*Boston, MA 02114*

Deval L. Patrick  
GOVERNOR

Timothy P. Murray  
LIEUTENANT GOVERNOR

Ian A. Bowles  
SECRETARY

Tel: (617) 626-1000  
Fax: (617) 626-1181  
<http://www.mass.gov/envir>

January 23, 2008

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS  
ON THE  
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Norfolk Asphalt Company, Inc.  
PROJECT MUNICIPALITY : Norwood  
PROJECT WATERSHED : Boston Harbor  
EEA NUMBER : 14156  
PROJECT PROPONENT : Edgewood Development Co., LLC  
DATE NOTICED IN MONITOR : December 24, 2007

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.03 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** the preparation of a mandatory Environmental Impact Report (EIR).

Project Description

As described in the Environmental Notification Form (ENF), the project includes an upgrade and reactivation of an existing bituminous concrete plant located at 601-635 Pleasant Street in Norwood. Active asphalt manufacturing operations on the project site ceased in 1989. The upgraded plant will consist of a dryer, a baghouse, an oil storage tank, two liquid asphalt storage tanks, a burner, a batch tower, and other associated materials storage areas. The upgraded plant will be located in approximately the same footprint as the existing plant. The proponent has proposed a self-imposed permit limit of production of up to 200,000 tons per year (TPY) of asphalt, with year-round operations, weather permitting. The plant will be fired by

natural gas (currently on the property) with Ultra Low Sulfur Distillate (ULSD) as a back-up fuel.

The project site is located in an industrially zoned portion of Norwood, adjacent to the Neponset River and a Massachusetts Bay Transportation Authority (MBTA) commuter rail line. The site is proximate to other commercial uses, as well as an adult daycare center. An elementary school is located to the west of the project site, separated by the MBTA commuter rail and wooded undeveloped land. According to the ENF, the nearest residential abutter is approximately 650 south on Pleasant Street. The 3.4-acre site will retain the approximately 2.3-acres of impervious area and demolition of some smaller existing structures will leave a total on-site square footage of 17,240 square feet (sf). The existing commercial operation (Basic Rental) will remain on-site in addition to the proposed asphalt production operations. Temporary impacts to on-site wetlands include the hand removal of invasive species and trash from the Neponset River and other wetlands, as well as minor impact to the Riverfront Area (approximately 200 sf) for the construction of stormwater management structures. Site drainage improvements include the installation of a grit removal system (Downstream Defender or equivalent) and the construction of a roof drain system for additional stormwater management. The project will be required to meet applicable Massachusetts Department of Environmental Protection (MassDEP) and U.S. Environmental Protection Agency (U.S. EPA) air quality standards.

This voluntary ENF included documentation of potential air quality, wetlands, and stormwater impacts. The ENF outlined operations and maintenance plans, as well as erosion and sedimentation control plans, prepared in accordance with applicable State guidelines and regulations. The ENF contained an auditory impact analysis, a spill prevention, control and countermeasure plan, an air dispersion model, and copies of air permit applications and local wetlands review documents. The ENF also included Best Available Control Technologies (BACT) statements, outlining the types of emission control technologies to be used in association with the project.

### Jurisdiction and Permitting

This ENF was filed voluntarily by the proponent. The status of the plant as a “new” or “reactivation of an existing facility” has no bearing on the fact that the project does not exceed MEPA thresholds. The project will require a new MassDEP Non-Major Comprehensive Plan Approval (310 CMR 7.02(5)). The project has received an Order of Conditions from the Norwood Conservation Commission for work within buffer zone to state-regulated wetland resource areas. The project will require a permit under the National Pollutant Discharge Elimination System (NPDES) program from the U.S. EPA. Local approvals from the Norwood Zoning Board of Appeals will be required.

The proponent is not seeking financial assistance from the Commonwealth. MEPA review of this voluntary filing will focus on those aspects of the project that may have significant environmental impacts and that are within the subject matter of required or potentially required state permits. In this case, MEPA jurisdiction extends to air quality and stormwater.

I have received many comment letters requesting that I deny the project based on air quality and human health impacts. MEPA is not a permitting process, and does not allow me to approve or deny a project. Rather, it is a process designed to ensure that state permitting agencies have adequate information on which to base their permit decisions and their Section 61 findings, and to ensure that potential environmental impacts are fully described and avoided, minimized and mitigated to the maximum extent feasible. Furthermore, several commenters have requested that I require a discretionary Environmental Impact Report (EIR) for this project. As noted above, the project does not exceed even the lowest thresholds for MEPA review. While I recognize the concerns conveyed by various parties, I am confident that those issues related to State agency actions can be adequately addressed during the individual air quality permitting process with MassDEP. In some instances, comments focused on site plan layout or zoning concerns. These items are more appropriately addressed by local boards of commissions whom have the authority to make decisions related to local bylaws.

### Air Quality

The project will require a Non-Major Comprehensive Plan Approval from MassDEP. The ENF has indicated that the project emissions will be below the MassDEP review thresholds noted in 301 CMR 11.03(8) and the U.S. EPA 40 CFR 60 subpart I. New air quality emission control equipment installed at the facility will meet or exceed MassDEP and U.S. EPA requirements. An air dispersion model was performed and concluded that the proposed project would not cause any condition of non-compliance with the National and Massachusetts Ambient Air Quality Standards. Additionally, the auditory analysis performed concluded that the project will be in compliance with the MassDEP noise regulation (310 CMR 7.10).

Estimated emissions in tons per year (TPY) from the facility for criteria pollutants include:

<b>Criteria Pollutant</b>	<b>Particulate Matter (PM<sub>10</sub>)</b>	<b>Nitrogen Oxides</b>	<b>Sulfur Dioxide (SO<sub>2</sub>)</b>	<b>Carbon Monoxide (CO)</b>	<b>Volatile Organic Compounds (VOC)</b>	<b>Hazardous Air Pollutants (HAPs)</b>
Facility Total	2.91 TPY	4.80 TPY	0.02 TPY	7.86 TPY	1.23 TPY	0.76 TPY

MassDEP relies on the application of Best Available Control Technology to minimize emissions impacts from new facilities. The net emissions of a proposed facility are modeled to assess off-site air pollutant concentrations. These are compared to National Ambient Air Quality Standards (NAAQS), which are set to protect public health and public welfare. The emissions from this proposed facility are very small; modeling shows no exceedances of the health-based standards. Facilities of this size are not routinely assessed for air toxics; total hazardous air pollutants (HAPS), as defined under the under the Clean Air Act are estimated to be 0.76 tpy, which is significantly below the regulatory threshold of 25 TPY (Sec. 112 of the U.S. Clean Air

Act). MassDEP has indicated that technical issues related to the project will be addressed during the permitting process for Non-Major Comprehensive Plan Approval.

#### Stormwater/Wetlands

Under existing conditions, stormwater drainage from the site discharges directly into the Neponset River via a simple catch basin and single pipe system. Under proposed conditions, a total suspended solids (TSS) removal system (Downstream Defender or equivalent) will be installed in the stormwater drain line before the stormwater enters the Neponset River. Additionally, a roof drain system will be installed on the existing Basic Supply building, with downspouts connecting to the drainage system past the Downstream Defender so the clean water can be directed to the Neponset River. A gate valve will also be installed on the drainage system to prevent discharge to the Neponset River in case of a hazardous materials spill. The proponent should design and construct the stormwater management system in accordance with the Massachusetts Stormwater Management Policy (SMP).

The proponent will be required to prepare an erosion and sedimentation control plan in accordance with the NPDES permit and any conditions outlined by the Norwood Conservation Commission or other local approval authority. The proponent should take measures to reduce potential demolition, construction period, and operational impacts (including but not limited to noise, vibration, and dust).


The project will not result in the permanent alteration to on-site wetland resource areas. The project site is located adjacent to the Neponset River. The Neponset River is completely within a stone armored channel alongside the project site and there is a small area of Bordering Vegetated Wetland (BVW) within the stone armored channel. The proponent has proposed the removal of invasive species and a general clean-up of the river by hand, which will result in temporary impacts to wetland resource areas. Additionally, approximately 200 sf of paved Riverfront Area in the existing Basic Rental parking lot will be disturbed temporarily to facilitate the installation of a new water quality management structure.

#### Construction Period Impacts

The proponent must comply with MassDEP's Solid Waste and Air Quality Control regulations during construction. I encourage the proponent to incorporate construction waste recycling activities as a sustainable measure for the project. The proponent should consult with MassDEP for appropriate standards and guidelines for managing construction waste.

The proponent can resolve any remaining issues during the state permitting process. No further MEPA review is required.

January 23, 2008  
Date

  
Ian A. Bowles

Comments received:

1/11/2008 Jessica Church  
1/11/2008 Laurie and Erik Larson  
1/11/2008 Heather Cole  
1/11/2008 Mr. and Mrs. Paul C. Sullivan  
1/13/2008 Donna M. Sparrow  
1/14/2008 Richard Mirabile  
1/14/2008 Toxics Action Center  
1/15/2008 Massachusetts Department of Environmental Protection SERO

IAB/HSJ/hsj