

Commonwealth of Massachusetts

Executive Office of Environmental Affairs ■ MEPA Office

ENF

Environmental Notification Form

<i>For Office Use Only</i> <i>Executive Office of Environmental Affairs</i>	
EOEA No.:	13791
MEPA Analyst:	ANNE CANADAY
Phone: 617-626-	X 1035

The information requested on this form must be completed to begin MEPA Review in accordance with the provisions of the Massachusetts Environmental Policy Act, 301 CMR 11.00.

Project Name: MCP Response Action for Debris Area off Knox Trail		
Street: 214Y Main Street		
Municipality: Concord	Watershed: SuAsCo	
Universal Tranverse Mercator Coordinates: 206741.33 E, 911173.86 N	Latitude: 42° 27' 2.64" Longitude: -71° 25' 3.7"	
Estimated commencement date: 6/06	Estimated completion date: 6/07	
Approximate cost: \$2,000,000	Status of project design:	90 %complete
Proponent: Remedium Group/ W.R. Grace & Co.-Conn.		
Street: 62 Whittemore Avenue		
Municipality: Cambridge	State: MA	Zip Code: 02140
Name of Contact Person From Whom Copies of this ENF May Be Obtained: Melissa Moulton		
Firm/Agency: Woodard & Curran, Inc.	Street: 980 Washington Street Suite 325	
Municipality: Dedham	State: MA	Zip Code: 02026
Phone: (781) 251-0200	Fax: (781) 251-0847	E-mail: MMoulton@woodardcurran.com

- Does this project meet or exceed a mandatory EIR threshold (see 301 CMR 11.03)?
 Yes No
- Has this project been filed with MEPA before?
 Yes (EOEA No. _____) No
- Has any project on this site been filed with MEPA before?
 Yes (EOEA No. _____) No
- Is this an Expanded ENF (see 301 CMR 11.05(7)) requesting:
- a Single EIR? (see 301 CMR 11.06(8)) Yes No
 - a Special Review Procedure? (see 301CMR 11.09) Yes No
 - a Waiver of mandatory EIR? (see 301 CMR 11.11) Yes No
 - a Phase I Waiver? (see 301 CMR 11.11) Yes No

Identify any financial assistance or land transfer from an agency of the Commonwealth, including the agency name and the amount of funding or land area (in acres): None

Are you requesting coordinated review with any other federal, state, regional, or local agency?
 Yes (Specify _____) No

List Local or Federal Permits and Approvals: US Army Corps of Engineers General Permit, Concord Natural Resources Commission Order of Conditions, and Concord Earth Removal Permit.

Which ENF or EIR review threshold(s) does the project meet or exceed (see 301 CMR 11.03):

- | | | |
|---------------------------------|--|--|
| <input type="checkbox"/> Land | <input checked="" type="checkbox"/> Rare Species | <input type="checkbox"/> Wetlands, Waterways, & Tidelands |
| <input type="checkbox"/> Water | <input type="checkbox"/> Wastewater | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Air | <input type="checkbox"/> Solid & Hazardous Waste |
| <input type="checkbox"/> ACEC | <input type="checkbox"/> Regulations | <input type="checkbox"/> Historical & Archaeological Resources |

Summary of Project Size & Environmental Impacts	Existing	Change	Total	State Permits & Approvals
LAND				<input checked="" type="checkbox"/> Order of Conditions <input type="checkbox"/> Superseding Order of Conditions <input type="checkbox"/> Chapter 91 License <input type="checkbox"/> 401 Water Quality Certification <input type="checkbox"/> MHD or MDC Access Permit <input type="checkbox"/> Water Management Act Permit <input type="checkbox"/> New Source Approval <input type="checkbox"/> DEP or MWRA Sewer Connection/ Extension Permit <input checked="" type="checkbox"/> Other Permits (including Legislative Approvals) – Specify: MCP Tier 1C Site
Total site acreage	73			
New acres of land altered		6.9		
Acres of impervious area	0	0	0	
Square feet of new bordering vegetated wetlands alteration		4,379 ⁴		
Square feet of new other wetland alteration		26,809 s.f. ^{1,4} 239 l.f. ^{2,4} 34,899 s.f. ^{3,4}		
Acres of new non-water dependent use of tidelands or waterways		0		
STRUCTURES				
Gross square footage	0	0	0	
Number of housing units	0	0	0	
Maximum height (in feet)	0	0	0	
TRANSPORTATION				
Vehicle trips per day	0	0	0	
Parking spaces	0	0	0	
WATER/WASTEWATER				
Gallons/day (GPD) of water use	0	0	0	
GPD water withdrawal	0	0	0	
GPD wastewater generation/ treatment	0	0	0	
Length of water/sewer mains (in miles)	0	0	0	

(1) Riverfront Area
 (2) Inland Bank
 (3) Bordering Land Subject to Flooding
 (4) Alterations will be temporary. Remediation will not include permanent structures or impervious surfaces.

CONSERVATION LAND: Will the project involve the conversion of public parkland or other Article 97 public natural resources to any purpose not in accordance with Article 97?

Yes (Specify _____) No

Will it involve the release of any conservation restriction, preservation restriction, agricultural preservation restriction, or watershed preservation restriction?

Yes (Specify _____) No

RARE SPECIES: Does the project site include Estimated Habitat of Rare Species, Vernal Pools, Priority Sites of Rare Species, or Exemplary Natural Communities?

Yes (Specify: Located in Priority Habitat 466 & Estimated Habitat 143) No

HISTORICAL /ARCHAEOLOGICAL RESOURCES: Does the project site include any structure, site or district listed in the State Register of Historic Place or the inventory of Historic and Archaeological Assets of the Commonwealth?

Yes (Specify _____) No See Appendix B

If yes, does the project involve any demolition or destruction of any listed or inventoried historic or archaeological resources?

Yes (Specify _____) No See Appendix B

AREAS OF CRITICAL ENVIRONMENTAL CONCERN: Is the project in or adjacent to an Area of Critical Environmental Concern?

Yes (Specify _____) No

PROJECT DESCRIPTION: The project description should include (a) a description of the project site, (b) a description of both on-site and off-site alternatives and the impacts associated with each alternative, and (c) potential on-site and off-site mitigation measures for each alternative (You may attach one additional page, if necessary.)

This project is proposed to complete actions which are required by the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000) for the site listed as the "Debris Area Off Knox Trail". The proposed work activities are located on a portion of the property identified as 214Y Main Street and Parcel 2322 on Concord Assessor's Map 11B. The Site is approximately a 16-acre area within the 73-acre parcel owned by W.R. Grace & Co - Conn. A Site Locus Map is provided as Appendix A.

The Debris Area Off Knox Trail Disposal Site (the Site) is identified by the Massachusetts Department of Environmental Protection (MADEP) as Release Tracking Number (RTN) 3-21297 and is currently Tier Classified as a Tier IC Disposal Site under Permit Number W032504. Response actions have been conducted at the Site since it was initially listed by MADEP in December 2001, which have been documented in respective Phase reports and submittals in accordance with the MCP. Results of field investigation activities have concluded that Site soil is impacted by metals, polychlorinated biphenyls (PCBs), extractable petroleum hydrocarbons (EPH), polynuclear aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), nitrocellulose (NC), and low concentrations of nitroaromatics/nitroamines. In addition, asbestos-containing material (ACM), nitrocellulose product, and miscellaneous debris are present, mixed with Site soils.

The Site is undeveloped and consists of a relatively flat upland area, a steep slope downward toward the flood plain of the Assabet River, and a relatively flat area below the slope. The Site is primarily covered by a mixed conifer and hardwood forest. Wetlands areas are also present on the Site, including various wetland plants and shrubs. Several unpaved paths run through the Site. A six-foot high chain link fence is located along the western subject property boundary and the northern Site boundary. This fence restricts access to the Site from the west and north. The Assabet River restricts access to the Site from the south and east. Overhead utilities are located adjacent to the Site at the access gate to the property from Knox Trail. The ground surface of the entire Site is unpaved. Remnants of historical Site activities, including three paint test racks, a timber structure filled with sand, several old clay pipes,

and two stone headwalls are present at the Site.

The remediation project is being completed under the MCP as part of the Phase IV Remedy Implementation Plan (RIP). Therefore, the site is 'adequately regulated' in terms of the actions that will be performed to reach site closure under the MCP. The completion of the Phase IV study and report also has satisfied the DEP requirements for alternatives analysis leading to a final remedy that will be protective of the public health and environment, and will satisfy the MCP requirements.

The project requires MEPA Environmental Notification Form (ENF) review (but not an EIR) based on the fact that remediation activities are partially located within an area of Priority Habitat 466 and Estimated Habitat 143 as indicated in the 11th Edition of the Massachusetts Natural Heritage Atlas. According to correspondence from the Division of Fisheries and Wildlife two species of special concern, the Triangle Floater (*Alasmidonta undulate*) and the Eastern Pondmussel (*Lagumia nasuta*), have been found in the vicinity of the site. These two species have limited mobility and will be avoided during the remediation activities. The construction period of the remediation activities will be temporary, having a two month duration during the late summer months. There are no federally-listed or proposed, threatened or endangered species or critical habitat under the jurisdiction of the U.S. Fish and Wildlife Service known to occur on the site. A copy of correspondence between the applicant and the Massachusetts Division of Fisheries and Wildlife and the U.S. Fish and Wildlife Service relative to rare species is provided (see Appendix B). A copy of the Massachusetts Natural Heritage Atlas is provided in the Natural Resources Inventory attached as Appendix C.

In addition to state permitting, the project will also require obtaining a Category II PGP from US Army Corps of Engineers under Section 404 of the Clean Water Act and an Order of Conditions from the Concord Natural Resources Commission, since the project will involve the unavoidable and temporary alteration of several wetland resources areas under the Massachusetts Wetlands Protection Act and Massachusetts Rivers Protection Act. The project is considered a "limited project" under 310 CMR 10.53(3)(q), as the work is being done under the MCP as part of the Phase IV Remedy Implementation Plan (RIP). A description of the onsite wetland resources from a Natural Resources Inventory is provided as Appendix C.

Results of the previously completed MCP Phase I Initial Site Investigation (ISI)/Tier Classification Submittal and Phase II Comprehensive Site Assessment (CSA), including a Site-specific Method 3 Risk Characterization, indicate that the Site poses unacceptable risks to human health, public welfare, and the environment. The various remedial alternatives for the Site were fully evaluated as part of the MCP Phase III Remedial Action Plan, leading to the final remedy (Phase IV) solution described in this ENF filing. If requested by MEPA, the DEP, or local agencies that will issue permits for this remediation work to proceed, the applicant will submit copies of the Phase III and Phase IV reports.

Debris was historically disposed of at the Site from offsite sources. The areas containing debris make up the southern portion of the Site and have been delineated into two areas, referred to as the "Concentrated Debris Area" (CDA) and the "Scattered Debris Area" (SDA). The CDA is a generally continuous area of debris located along a slope, which is present at depths up to 10 feet below ground surface (bgs). The SDA is an area to the east of the CDA slope that consists of numerous piles of debris and debris scattered on the ground surface. In addition, the Site includes an area referred to as the "Wastewater Process Area" (WPA) that was historically used for handling wastewater from the manufacturing of NC.

Due to the nature and extent of contamination at the Site and the ongoing risk that it presents if left unremediated, there are no appreciable alternatives to the recommended remedial approach, which is fully and adequately regulated under the MCP. A "No Clean-up Action" alternative would not meet the performance standards of the MCP which require that a Site reach a "permanent solution" with "no significant risk" of harm to human health, public welfare, safety and the environment. The risk characterization, previously completed as part of the MCP Phase II Comprehensive Site Assessment (April 2005) concluded that the concentrations of NC at the Site present a risk of harm to public welfare. The various remedial alternatives for the site were fully evaluated as part of the MCP Phase III Remedial Action Plan (RAP) in accordance with the provisions of 310 CMR 40.0851 through 40.0869. The primary objective of this remediation project is the cleanup of the Site in accordance with the MCP in order to reach a level of "no significant risk" and reach a permanent solution. The final remedy was selected after consideration of the environmental resources involved and with full consideration of minimizing impacts to sensitive resource areas. The maximum resource protection will be achieved by the cleanup of the site in accordance with the MCP as

proposed.

For the CDA and SDA, approximately 8,300 cu. yd of debris and ACM will be excavated and transported off-site for disposal at an appropriate disposal facility. All visible debris piles will be removed, including the excavation of the top six inches of soil beneath the debris. Depending on access, excavation will be completed with either heavy equipment or hand held equipment and the debris will be either live-loaded or temporarily stockpiled. The approximate lateral extent of ACM and debris to be removed is depicted on the Appendix D-2 and D-3. The applicant has received an Order of Conditions (OOC) from the Concord Natural Resources Commission for work within the CDA and SDA. The OOC outlines the measures to be implemented to protect the resource areas and assure that adequate mitigation and restoration is provided.

For the WPA, the NC will be excavated, stabilized through on-site processing, and transported for off-site disposal. Excavation of the NC will be performed in distinct stages based on its location and accessibility. The majority of the NC product and NC/soil mix will be removed via an excavator to depths ranging from 2 to 7 feet bgs. Material will be excavated to depths of approximately 2 feet in the BVW and riverbank. It is estimated that there are 6,700 cubic yards (c.y.) of NC product or NC mixed with soil in the WPA of the Site. There is approximately 420 c.y. on the NC product or NC mixed with soil to be removed from the BVW and riverbank. The lateral extents of the areas impacted by NC are shown on Appendix D-4. The local Conservation Commission Order of Conditions that will be obtained following the MEPA review for the WPA will fully protect the resource areas and assure that adequate mitigation and restoration is provided

Appendix E includes a detailed narrative describing the proponent's efforts to minimize and, where unavoidable and temporary impacts are required as a result of implementing the Phase III Remedial Action Plan, fully mitigate the impacts to site wetland resource areas. This narrative describes specific minimization measures that will be implemented as part of remedial activities. These measures will minimize extents and potential disturbance to wetland resource areas that have been identified as part of the Site area. In addition to these minimization measures, Appendix E also includes a comprehensive site restoration plan to fully mitigate the temporary and unavoidable impacts to the on-site wetland resources.

LAND SECTION – all proponents must fill out this section

I. Thresholds / Permits

A. Does the project meet or exceed any review thresholds related to **land** (see 301 CMR 11.03(1))
 Yes No; if yes, specify each threshold:

II. Impacts and Permits

A. Describe, in acres, the current and proposed character of the project site, as follows:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Footprint of buildings	<u>0</u>	<u>0</u>	<u>0</u>
Roadways, parking, and other paved areas	<u>0</u>	<u>0</u>	<u>0</u>
Other altered areas (describe)	<u>1.9 ac*</u>	<u>6.9 **</u>	<u>8.8 Ac</u>
Undeveloped areas	<u>71.1 Ac</u>	<u>0</u>	<u>71.1 Ac</u>

* Gravel access roads and gas easement.

** Temporary disturbance of woodland areas for site remediation. Site will be re-vegetated upon completion of remediation and will result in a net change of 0 acres.

B. Has any part of the project site been in active agricultural use in the last three years?
 Yes No; if yes, how many acres of land in agricultural use (with agricultural soils) will be converted to nonagricultural use?

C. Is any part of the project site currently or proposed to be in active forestry use?
 Yes No; if yes, please describe current and proposed forestry activities and indicate whether any part of the site is the subject of a DEM-approved forest management plan:

D. Does any part of the project involve conversion of land held for natural resources purposes in