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March 8, 2007

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

PROJECT NAME:	Westover Distribution Center Site Remediation
PROJECT MUNICIPALITY:	Ludlow
PROJECT WATERSHED:	Chicopee
EOEA NUMBER:	13964
PROJECT PROPONENT:	Dyno Nobel, Inc.
DATE NOTICED IN MONITOR:	February 6, 2007

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** the preparation of an Environmental Impact Report (EIR).

Project Description

As described in the Environmental Notification Form (ENF), the project involves environmental remediation on a portion of an explosives storage facility located at 462 Randall Road in Ludlow. The work is being conducted pursuant to the Massachusetts Contingency Plan, 310 CMR 40.00 (MCP). The site contains metals-contaminated soil that resulted from the destruction of blasting caps and shock tubes approximately 20 to 30 years ago. Following detonation the debris was buried in-place. The detonation scattered the material on the ground surface in an area surrounding the disposal area and on an adjacent parcel owned by the Town of Ludlow. The proponent proposes to remove the contaminated

source through excavation, ex-situ stabilization and transport off-site for reuse. A portion of the site where remediation is proposed consists of bordering vegetated wetlands (BVW) associated with a drainage ditch that discharges to Stony Brook.

Jurisdiction

The project is undergoing review pursuant to Section 11.03(3)(b)(1)(d) of the MEPA regulations because it will result in the alteration of more than 5,000 square feet (sf) of BVW. The project requires a Section 404 Programmatic General Permit from the U.S. Army Corps of Engineers (ACOE); a 401 Water Quality Certificate and a Beneficial Use Determination (BUD) from the Department of Environmental Protection (MassDEP); and an Order of Conditions from the Ludlow Conservation Commission.

The proponent is not seeking financial assistance from the Commonwealth for the project. Therefore, MEPA jurisdiction applies to those aspects of the project within the subject matter of required permits or state agency review. In this case, MEPA jurisdiction is limited to issues related to wetlands and hazardous waste.

MCP Issues

The property has been impacted by hazardous materials due to the historical use of the site as an explosives storage facility. As a result of the destruction of blasting caps and shock tubes, the site soil and groundwater has been contaminated with metals. The Release Tracking Number (RTN) associated with the property is 1-14788. The site has a Tier IB Permit that expires May 8, 2009 and is currently in Phase III of the MCP process. In response to comments from MassDEP, and the Tier IB Permit Approval letter, the proponent should submit the following to MassDEP:

- The Phase IV Remedy Implementation Plan, as described in 310 CMR 40.0874, unless a Response Action Outcome (RAO) statement is submitted prior to May 8, 2007.

- The Phase IV As-Built Construction Report, Final Inspection Report, and Phase IV Completion Statement, as described in 310 CMR 40.0875, 40.0878, and 40.0879, respectively, unless a Response Action Outcome (RAO) statement is submitted prior to May 8, 2008.

If an RAO or Remedy Operation Status (ROS) cannot be achieved at the site prior to the expiration date of the Permit, an application for a Permit Extension must be submitted to MassDEP.

The MCP cleanup standards for perchlorate became effective on July 28, 2006. The MCP GW-1 groundwater standard for perchlorate is 2 µg/l. The proponent sampled groundwater at the site for perchlorate in 2003. The groundwater results were noted to be less than the laboratory method detection limit of 2.5 µg/l. In response to comments from

MassDEP, the proponent should resample the on-site groundwater monitoring wells for comparison with the current MCP groundwater standard for perchlorate, using an appropriate laboratory detection limit.

Wetlands

The proponent considered several alternative remediation methods during project planning including phytoremediation, acid extraction, stabilization and on-site reuse, stabilization and off-site reuse, and the no-build alternative. The phytoremediation alternative was rejected due to anticipated unpredictability in reaching the remediation endpoint. The acid extraction alternative was not selected due to technical complexity and unproven use on full-scale projects. The on-site reuse and no-build alternatives were rejected as they are incompatible with the requirements of the MCP. The preferred alternative, stabilization and off-site reuse, is the remedial action alternative (RAA) selected based on the Phase III Remedial Action Plan.

As part of the selected RAA, the contaminated material will be excavated to an estimated maximum depth of 15 feet on the project site and to an approximate depth of 3 feet on the adjacent Town of Ludlow parcel. The excavated soil will then be stabilized through the use of binding agents, which prevent mobilization of metals. The material will be managed as a Remediation Waste under the MCP and will be transported to a permitted receiving facility and used in accordance with applicable permits and regulations. Future exposure at the project site and on the Town-owned parcel would be limited by an Activity and Use Limitation (AUL).

Wetland impacts will result from the excavation of material from 8,000 sf of BVW as well as alteration of approximately 15,820 sf of BVW for vehicle access to the contaminated soils on the Town of Ludlow property and for access to install silt fence and other perimeter controls. The project will result in temporary impacts to 23, 820 sf of BVW in total. The proponent has filed a Notice of Intent with the Ludlow Conservation Commission in accordance with the Limited Project provisions at 310 CMR 10.53(3)(q). The proponent has also submitted an application for a 401 Water Quality Certificate to MassDEP which is currently under review. The proponent will implement erosion and sedimentation controls during construction in accordance with MassDEP's Stormwater Management Policy and the EPA's Stormwater General Construction Permit.

The proponent proposes to restore impacted wetland areas to pre-existing conditions, resulting in no net loss of wetland resource areas. A preliminary wetland mitigation plan and planting list was submitted with the ENF. The final replication plan will be developed as part of the Wetland Protection Act permitting process. The proponent should ensure that it follows MassDEP's *Massachusetts Inland Wetland Replication Guidelines* (March 2002) when designing, constructing and monitoring the success of the proposed restoration area.

Conclusion

Following a review of the ENF and comments submitted by MassDEP, I find that the impacts of the project within MEPA jurisdiction do not warrant the preparation of an EIR. The proponents may resolve any remaining issues during the state and local permitting processes.

March 8, 2007
Date

Ian A. Bowles

Comments received:

2/26/2007 Department of Environmental Protection, Western Regional Office

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