Commonwealth of Massachusetts
Executive Office of Environmental Affairs ■ MEPA Office

ENF Environmental Notification Form

For Office Use Only
Executive Office of Environmental Affairs
EOEA No: 14043
MEPA Analyst: Nick Zavolas
Phone: 617-626-1030

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: National Standard Site Remediation		
Street: 72 James Street		
Municipality: Worcester	Watershed: Blackstone	
Universal Tranverse Mercator Coordinates:	Latitude: 42° 13' 51" Longitude: -71° 51' 5"	
Estimated commencement date: 2007	Estimated completion date:	
Approximate cost: To be determined	Status of project design: 100%complete	
Proponent: National-Standard, LLC		
Street: 5555 North Irwindale Avenue		
Municipality: Irwindale	State: CA	Zip Code: 91706-1097
Name of Contact Person From Whom Copies of this ENF May Be Obtained: Marc J. Richards, P.E., LSP		
Firm/Agency: Tighe & Bond, Inc.	Street: 446 Main Street	
Municipality: Worcester	State: MA	Zip Code: 01608
Phone: 508-754-2201	Fax: 508-795-1087	E-mail: mjrichards@tighebond.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): *Not applicable*

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

List Local or Federal Permits and Approvals: *Order of Conditions (Worcester Conservation Commission), Site Plan Approval (Worcester Planning Board), Special Permit (Worcester Zoning Board of Appeals), Section 404 Authorization (US Army Corps of Engineers), NPDES Phase II Notice of Intent (USEPA), Individual 401 WQC (MA DEP)*

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

- ☐ Land
- ☐ Water
- ☐ Energy
- ☐ ACEC
- ☐ Rare Species
- ☐ Wastewater
- ☐ Air
- ☐ Regulations
- ☒ Wetlands, Waterways, & Tidelands
- ☐ Transportation
- ☐ Solid & Hazardous Waste
- ☐ Historical & Archaeological Resources

Summary of Project Size & Environmental Impacts	Existing	Change	Total
LAND			
Total site acreage	23.5		
New acres of land altered		2.79	
Acres of impervious area	0.023	4.57	4.59
Square feet of new bordering vegetated wetlands alteration		13,716	
Square feet of new other wetland alteration		106,633 BLSF	
Acres of new non-water dependent use of tidelands or waterways		0	
STRUCTURES			
Gross square footage	8,712	-1,307	7,405
Number of housing units	0	0	0
Maximum height (in feet)	14	14	28
TRANSPORTATION			
Vehicle trips per day	0	0	0
Parking spaces	5	0	tbd
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

State Permits & Approvals

- ☒ Order of Conditions
- ☐ Superseding Order of Conditions
- ☐ Chapter 91 License
- ☒ 401 Water Quality Certification
- ☐ MHD or MDC Access Permit
- ☐ Water Management Act Permit
- ☐ New Source Approval
- ☐ DEP or MWRA Sewer Connection/ Extension Permit
- ☐ Other Permits (*including Legislative Approvals*) – Specify:

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_____) ☒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

If yes, does the project involve any demolition or destruction of any listed or inventoried historic or archaeological resources?
☐Yes (Specify_____) ☐No

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.*)

The site possesses hazardous materials including arsenic, cadmium, and lead in groundwater. These contaminants were introduced to the environment over the course of the site's history as an industrial property. Based on the executed and amended Administrative Consent Order with the Department of Environmental Protection, A Response Action Outcome (RAO) Statement must be submitted to the DEP no later than December 2007. The goal of this project is to achieve a Class A or a Class C Response Action Outcome (RAO) Statement as defined in the Massachusetts Contingency Plan (MCP) (310 CMR 40.0000). A Class A RAO is a permanent solution and a Class C RAO is a temporary solution. The Class C RAO would only be submitted to the DEP if it is determined that it is "infeasible" to achieve a permanent solution in accordance with the MCP.

The subject parcel consists of 23.5 acres of land. It is abutted to the north by Ludlow Street, to the east by residential properties along James Street, and to the south and west by railroad tracks. The site developed over time as the result of historical industrial development in this part of the City, including the former Jamesville Pond Basin – an historic mill pond. The basin itself, where work in resource areas will occur, has been a dynamic system since at least 1952. The basin has been alternatively flooded and dry, depending on whether man-made or beaver dams have been present at its outlet. In late 2006, permits were procured to breach beaver dams in the basin, with express purpose of dewatering the basin to better characterize remediation areas, evaluate access option, and determine what perpetual resource area limits would be if natural, run-of-river conditions could be achieved for Kettle Brook.

A feasibility evaluation has been prepared as the alternative analysis for the proposed project. Given the involvement of multiple regulatory agencies from different perspectives (i.e., wetlands versus hazardous materials cleanup), a "no action" alternative was not considered. On the basis of the available data, it appears that implementation of any remedial alternative in the former Jamesville Pond basin with the objective of mitigating potential environmental risks within the short-term through excavation of soil/sediment could entail costs that may be disproportionate to the incremental benefits of risk reduction and environmental restoration. The current approach to managing contamination within the basin is to maximize the volume of soil/sediment that can be excavated and placed beneath the engineered barrier. Once complete, the residual contaminant concentrations within the basin will be evaluated to determine if a Class A or Class C RAO is applicable.

The proposed project includes the excavation of lead-impacted soil and sediment for encapsulation within the on-site engineered barrier; associated grading and stormwater controls; and resource area restoration activities. The construction sequence will involve (1) vegetation removal; (2) Installation of protective measures (i.e., hay bales and silt fence); (3) Excavation of Northern Areas; (4) Installation of the temporary access road; (5) Excavation of Southern Areas; (6) Restoration of Southern Areas; (7) Removal of the temporary access road; (8) Restoration of the temporary access road area and Southern Areas; (9) Construction and grading associated with the engineered barrier (landfill cap system); (10) Removal of protective measures following re-vegetation.

Below is a description of the nine DEP Stormwater Management Standards in relation to the project:

Standard 1: The proposed project will result in a new stormwater point discharge adjacent to, but not within, BVW. Stormwater will be treated (see following Standards) prior to discharge. An energy dissipation device (*e.g.*, riprap pad) will be installed at the discharge point to minimize potential for erosion and sedimentation of wetlands and waters.
Standard 2: The peak discharge rates for post-development site conditions will be below peak discharge rates of existing conditions, with the proposed stormwater controls.
Standard 3: The proposed project will result in approximately 200,000 square feet of new impervious area. Assuming all of the soils at the site were categorized as Hydrologic Soil Group A, the required recharge rate would be 0.40 inches per square foot. Calculations indicate that 6,667 cubic feet of infiltration would be required. However, under MCP regulations, soil at this site has been deemed contaminated with hazardous material (*i.e.*, lead, cadmium and arsenic at concentrations greater than applicable MCP standards for soil) and will be capped with a geosynthetic clay liner and bituminous pavement in accordance with MA DEP recommendations. Since infiltration of the soils would undermine the project's goals, it cannot be allowed. Therefore, this standard cannot be met.
Standard 4: The proposed redevelopment will use deep sump catchbasins (25% TSS removal) in conjunction with a stormwater treatment unit (77% TSS removal) and detention basin (70% TSS removal) on the southern perimeter to achieve a total in excess of 80% TSS removal.
Standard 5: This project does not contain land uses with higher potential pollutants as described in DEP's Stormwater Management Policy.
Standard 6: The proposed project will not discharge to or affect a critical area (see Figure 2 – DEP Priority Resources Map in Appendix B).
Standard 7: The proposed project improves the safety of the outstanding condition of the site and caps an existing contaminated landfill. All standards will be met with the exception of Standard 3 for the previously states reasons.
Standard 8: Erosion and sediment controls are incorporated into the project design. Refer to the Project Plans in Appendix G for proposed locations and details of controls.
Standard 9: A *Stormwater Control System Operation and Maintenance Plan*, dated January 2007, has been developed for this site. Details for this system are included below:

Stormwater Management System: The proposed project consists of capping a site containing contaminated soils to increase public and environmental safety. The project includes excavation of impacted soils in the resource area, site regrading and placement of an engineered impervious cap over the impacted soils for the upland area of the site.
The impacted area on site will be regraded to pitch toward a series of interconnected catch basins routed through one of two stormwater treatment units, then will discharge to a detention basin at the southern edge of the cap area. The detention basin has been designed with a multiple stage outlet structure that will reduce the peak runoff to the wetland where the outlet will be treated with an energy dissipation device to minimize the potential for erosion.
The stormwater treatment units have been sized for 77% TSS removal for the amount of impervious area being directed through each structure. Based on 1.77 acre and 0.51 acre contributing impervious areas, StormCeptor Models STC 2400 and STC 1200, respectively, have been specified for the structures on this site. The detention basin will be constructed with an impervious liner to further minimize the possibility of infiltration through the impacted soils on the site.

A mitigation design has been developed by Tighe & Bond on behalf of National Standard, LLC that is intended to address those portions of the National Standard Site Remediation Project where temporary disturbance of Bordering Vegetated Wetlands (BVW) and upland Bordering Land Subject to Flooding (BLSF) are unavoidable. This mitigation plan has been prepared in accordance with the Massachusetts Inland Wetland Replication Guidelines (MADEP 2002).

The proposed *in situ* mitigation is located at the areas of impact. The mitigation design calls for the restoration of emergent and scrub-shrub wetland through the seeding of compatible species. The proposal represents in-kind mitigation at a 1:1 ratio. Post-planting care will involve periodic inspections to ensure success of plant colonization.