

NPC # 12776 N2

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January 23, 2007

Ian A. Bowles
Secretary
Executive Office of Environmental Affairs
Attn: Deerin Babb-Brott
Director, MEPA
100 Cambridge Street, Suite 900
Boston, MA 02114

Project Name: Boston Water and Sewer Commission Materials Facility
EOEA Number: 12776
Project Proponent: Boston Water and Sewer Commission
Third Party: City of Everett

Third Party Notice of Project Change

The City of Everett ("Everett"), pursuant to 301 CMR §11.10, by this letter hereby submits for your consideration a Third Party Notice of Project Change ("Third Party NPC") regarding the above referenced proposed project proposed by the Boston Water and Sewer Commission ("BWSC"). Everett files this Third Party NPC because: 1) the relocation of the proposed project constitutes a material change prior to the taking of all Agency actions for the proposed project; 2) the material change would generate significant environmental consequences for Everett and the surrounding community; and 3) Everett was not notified by the BWSC of the Second Notice of Project Change proposing relocation of the proposed project to 180 Alford Street proximate to, and possibly including, Everett land and wetlands.

The Relocation of the Proposed Project Constitutes a Material Change

The relocation of the proposed project from the former Calf Pasture at Columbia Point in Dorchester ("2002 ENF") to 200-400 Frontage Road ("1st NPC") in Boston in 2005 to 180 Alford Street (Route 99) ("2nd NPC", attached) in the Charlestown section of Boston in 2006 constitutes a material change in the proposed project (301 CMR §11.10(6)(d)). The Frontage Road location is separated from the flowed tidelands associated with Fort Point Channel by a public way and at least 800 feet from the high water mark. The Alford Street location is located within the Mystic River watershed and proximate to

wetlands under the jurisdiction of Everett. The Frontage Road and Alford Street sites are materially different in scope of geographic location, geology, hydrogeology and potential environmental consequences.

Everett Is Impacted By the Proposed Project

The proposed project in its new location would generate significant environmental consequences impacting Everett (301 CMR §11.10(6)(b)). As noted, the 180 Alford Street location is located within the Mystic River watershed and adjacent to wetlands under the jurisdiction of Everett - a portion of the site may be Everett land. In addition, the proposed project will generate approximately 62 vehicle trips per day of trucks powered by diesel engines, some of which may need to travel along a detour route through Everett as a result of ongoing Alford Street Bridge repairs.

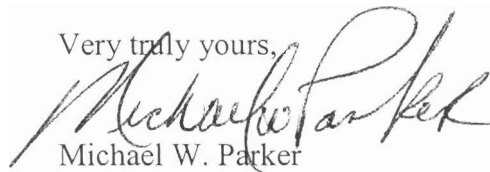
Everett Did Not Receive Notification of the 2nd NPC

Everett was not notified of the 2nd NPC by BWSC even though it will be impacted by the environmental consequences of the proposed project. Everett was not notified of the 2nd NPC because it had not requested or commented on the 2002 ENF filed for the Calf Pasture location (301 CMR §11.16(2)(c)). Since the Calf Pasture is approximately 7 miles from 180 Alford Street, Everett did not request or comment on the 2002 ENF. Everett will be significantly impacted by the environmental consequences of the proposed project and should not be unduly disadvantaged because it did not request or comment on the 2002 ENF describing a distant location. Everett submits this Third Party NPC in order to request further relevant and clarifying information regarding the proposed project and formally comment, if necessary.

Conclusion

For the above reasons, Everett respectfully requests that the Secretary determine that the noted material change in the proposed project is potentially significant in terms of its environmental consequences and requests the BWSC to provide further relevant and clarifying information regarding the proposed project to allow Everett an opportunity to review such information and formally comment, if necessary.

Please do not hesitate to contact me should you have any questions or comments regarding this submittal.

Very truly yours,

Michael W. Parker

cc: James J. Steinkrauss, Esq. BWSC
Mayor John F. Hanlon, Everett

<i>For Office Use Only</i> Executive Office of Environmental Affairs MEPA Analyst: <i>Beiong Angos</i> Phone: 617-626-1029

NPC

Notice of Project Change

The information requested on this form must be completed to begin MEPA Review of a NPC in accordance with the provisions of the Massachusetts Environmental Policy Act and its implementing regulations (see 301 CMR 11.10(1)).

Project Name: Relocation of Materials Handling Facility from Columbia Point to Alford Street		EOEA #: 12776
Street: 180 Alford Street		
Municipality: Charlestown	Watershed: Boston Harbor	
Universal Transverse Mercator Coordinates: TBD	Latitude: 42° 23' 36.00" N Longitude: 71° 04' 07.15"W	
Status of project construction: 0 %complete		
Proponent: Boston Water & Sewer Commission		
Street: 980 Harrison Avenue		
Municipality: Roxbury	State: MA	Zip Code: 02119
Name of Contact Person From Whom Copies of this NPC May Be Obtained: Whit Davis		
Firm/Agency: Camp Dresser & McKee Inc.	Street: 50 Hampshire St.	
Municipality: Cambridge	State: MA	Zip Code: 02139
Phone: 617-452-6602	Fax: 617-452-6602	E-mail: daviswhit@cdm.com

In 25 words or less, what is the project change? The project change involves the selection of a new, more appropriate, site for the proposed materials handling facility with a separate, odor-controlled sewer cleanings bay.
 See full project change description beginning on page 3.

Date of ENF filing or publication in the Environmental Monitor: April 30, 2002

Was an EIR required? Yes No; if yes,
 was a Draft EIR filed? Yes (Date:) No
 was a Final EIR filed? Yes (Date:) No
 was a Single EIR filed? Yes (Date:) No

Have other NPCs been filed? Yes (Date(s): June 30, 2005) No

If this is a NPC solely for lapse of time (see 301 CMR 11.10(2)) proceed directly to "ATTACHMENTS & SIGNATURES" on page 4.

PERMITS / FINANCIAL ASSISTANCE / LAND TRANSFER

List or describe all new or modified state permits, financial assistance, or land transfers not previously reviewed:

- 1) MWRA Sewer Use Discharge Permit- BWSC is in the process of requesting that an existing waiver be transferred to the current Alford Street site
- 2) Boston Cons. Comm. Wetland Permit- only if final project boundary is within wetlands buffer zone
- 3) Chapter 91 Determination of Applicability – DEP has determined that the Alford Street site is outside of Chapter 91 jurisdiction, therefore, no Chapter 91 License is required.

Are you requesting a finding that this project change is insignificant? (see 301 CMR 11.10(6))

Yes No; if yes, attach justification.

Are you requesting that a Scope in a previously issued Certificate be rescinded?

Yes No; if yes, attach the Certificate

Are you requesting a change to a Scope in a previously issued Certificate? Yes No; if yes, attach Certificate and describe the change you are requesting:

Summary of Project Size & Environmental Impacts	Previously reviewed	Net Change	Currently Proposed
LAND			
Total site acreage	17	<13>	4
Acres of land altered	1.0	<.3>	.7
Acres of impervious area	1.0	<.3>	.7
Square feet of bordering vegetated wetlands alteration	0		0
Square feet of other wetland alteration	0	-	0
Acres of non-water dependent use of tidelands or waterways	0	-	0
STRUCTURES			
Gross square footage	40,000	<5,750>	34,250
Number of housing units	0		0
Maximum height (in feet)	50		50
TRANSPORTATION			
Vehicle trips per day	62	-	62
Parking spaces	3	+9	12
WATER/WASTEWATER			
Gallons/day (GPD) of water use	300	-	300
GPD water withdrawal	0	-	0

GPD wastewater generation/ treatment	5,035	-	5,035
Length of water/sewer mains (in miles)	0	-	0

Does the project change involve any new or modified:

1. conversion of public parkland or other Article 97 public natural resources to any purpose not in accordance with Article 97? Yes No
 2. release of any conservation restriction, preservation restriction, agricultural preservation restriction, or watershed preservation restriction? Yes No
 3. impacts on Estimated Habitat of Rare Species, Vernal Pools, Priority Sites of Rare Species, or Exemplary Natural Communities? Yes No
 4. impact on 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 No; if yes, does the project involve any demolition or destruction of any listed or inventoried historic or archaeological resources? Yes No
 5. impact upon an Area of Critical Environmental Concern? Yes No
- If you answered 'Yes' to any of these 5 questions, explain below:

PROJECT CHANGE DESCRIPTION (attach additional pages as necessary). The project change description should include:

- (a) a brief description of the project as most recently reviewed
- (b) a description of material changes to the project as previously reviewed,
- (c) the significance of the proposed changes, with specific reference to the factors listed 301 CMR 11.10(6), and
- (d) measures that the project is taking to avoid damage to the environment or to minimize and mitigate unavoidable environmental impacts. If the change will involve modification of any previously issued Section 61 Finding, include a proposed modification of the Section 61 Finding (or it will be required in a Supplemental EIR).

Introduction

The Boston Water and Sewer Commission (the Commission) is responsible for the operation and maintenance of the wastewater, drainage and water distribution systems in the City of Boston. The maintenance function includes the periodic removal of materials that accumulate in the sewer and drain systems. The proper handling of these materials is a vital component in maintaining in good working order the wastewater and drainage infrastructure of the City of Boston. The Commission currently operates a facility for handling these materials at the site of its former Calf Pasture pumping station on Columbia Point in Dorchester (shown on the Existing Conditions Plan in Appendix C). The materials are consolidated there prior to their disposal off site at a landfill or other permitted solid waste facility.

The Commission has used the Calf Pasture site for over 20 years to handle catch basin, drain and sewer cleanings and trench excavate. The site has also been used to store pipes, hydrants, water meters and other construction materials such as sand, gravel, stone and cold patch asphalt. Six years ago, the Commission constructed covered bins that it currently uses for temporary storage of catch basin, drain and sewer cleanings and trench excavate in order to improve handling of these materials.

In 1999, the Commission was issued a National Pollutant Discharge Elimination System (NPDES) stormwater permit by the Environmental Protection Agency (EPA) and Department of Environmental Protection (DEP). Under its NPDES permit, the Commission must prevent the discharge of pollutants to and from its drainage system. Cleaning the drainage system, particularly the catch basins, has the added benefit of significantly decreasing the discharge of these pollutants into the receiving waters in the City. One effect of the permit has been more cleaning of the catch basins and an increase in the amount of materials that are removed. To effectively handle these materials, a new materials handling facility is needed.

Previous Projects

The handling facility was to be located originally on another parcel of land owned by the University of Massachusetts- Boston on Columbia Point, for which the 2002 ENF was written. Parties representing neighboring homes and schools opposed the location, and in 2005 a NPC was filed to relocate the new facility at 200-400 Frontage Road on property owned by the City of Boston. Due to site constraints at Frontage Road, and the availability of a more suitable site, the Commission decided to relocate this project to its Alford Street property.

Current Project

The current project will be located on a 4-acre abandoned industrial site recently purchased by the Commission. The Alford Street handling facility will be slightly larger (31,250 ft² versus the previous 26,000 ft²), but it will not include a salt storage facility (see Existing and Proposed Plans in Appendix D). The overall gross square footage has decreased from 40,000 ft² to 34,250 ft² (including the handling facility and office space). The handling facility will consist of a building where the catch basin cleanings from storm drains and combined sewer cleaning will be unloaded onto a tipping floor and pushed into separate bays. The cleanings will be left in the bays for a limited period of time to allow free water to drain. Radiant solar heating will aid the drying process. Drainage from catch basin cleanings will be discharged through a particle separator to a sanitary sewer. A front-end loader will be used to load materials into trucks or containers for hauling offsite to an approved solid waste disposal landfill. There are no plans to process the materials at the facility. Cleanings from sanitary and combined sewers will be unloaded onto a tipping floor into a separate bay designed with an odor control system.

Less than two percent of the materials handled at the proposed facility will be from sanitary combined sewers. The facility will also handle trench excavate, which is soil, concrete, broken pipe, and asphalt that is removed when a pipe or other structure is repaired or installed.

The Commission estimates that the facility will handle approximately 100 tons per day (tpd) of catch basin cleanings, 2 tpd of sewer cleanings, and 35 tpd of trench excavate. The facility will also have a small office of approximately 3,000 ft² equipped with restrooms and a backup computer system.

Rare Species

According to the Massachusetts Natural Heritage Atlas (11th edition, 2003), no Priority Habitats of Rare Species or Estimated Habitats of Rare Wildlife or Certified Vernal Pools are located on or near the site.

Wetlands, Waterways and Tidelands

DEP has issued a Chapter 91 Determination of Applicability for the project, stating that the Alford Street project site is outside of Chapter 91 jurisdiction because it is landward of the Historic High Water Mark. Appendix B contains the Determination of Applicability from the Waterways Regulation Program.

Water and Wastewater

The Commission estimates that the materials handling facility will require approximately 300 gallons per day (gpd) of water for washdown of the facility's floor and drains as well as for restroom facilities. The Commission estimates that the facility will generate approximately 5,035 gpd of wastewater. Approximately 285 gpd will be generated from the washdown of the floor and use of restroom facilities and 4,750 gpd of wastewater will result from dewatering of the catch basin cleanings. These quantities have remained unchanged from those reported in the 2002 ENF and 2005 NPC.

Wastewater will be discharged to an MWRA sewer located on the street. The discharge of wastewater from floor washdown and dewatering of the catch basin cleanings will require a Sewer Use Discharge Permit from the Toxics Reduction and Control section of the Massachusetts Water Resources Authority (MWRA). The Commission obtained an MWRA permit waiver for proposed sewer discharges at the previous site (Frontage Road) and will seek to transfer the waiver to the current site.

Transportation

The materials handling facility is designed for 30 trucks per day (round trips), which is equivalent to 60 vehicles per day (vpd). As reported in the ENF, the Commission expects that the facility will generate a total of 62 vpd.

The facility will be accessed via the main entrance on Alford St. across from the Boston Edison Gate, and an emergency access driveway located approximately 160 feet south of Dexter St. (for fire trucks, ambulances and other emergency vehicles only). See Figure 1 of the attached Traffic Impact and Access Study (in Appendix E) for a diagram of the site and its entrances.

The intersection at the entrance near Boston Edison Gate is a three-way signalized intersection, but pedestrian signal heads are absent, the existing traffic signal equipment is outdated, and the pre-timed coordinated operation appears to have fallen out of time-based coordination, resulting in inefficient operations. The Commission's proposed mitigation at the entrance near Boston Edison Gate includes reconstruction of the intersection, with a new curb cut meeting ADA/AAB requirements for wheelchair ramps, new traffic signal

equipment (including new loop detectors) in conformance with Boston Transportation Department (BTD) standards, and new pavement markings and signing. MassHighway reports that only three collisions have occurred at the intersection of Alford St. and Boston Edison Gate in the past three years, making its crash rate .06 acc/mev, much lower than the district average (.88 acc/mev). According to the capacity analysis for the intersection, it currently experiences an overall "A" Level of Service (LOS), with all approaches in the morning, mid-afternoon and evening peak hours experiencing at least an LOS "D" or better. Using a five-year planning horizon, the 2011 (design year) Build Analysis shows that the added traffic from the handling facility will not affect the overall LOS "A" during the morning, mid-afternoon and evening peak hours.

The intersection of Alford St. at Dexter St. is also a three-way signalized intersection, lacking pedestrian signal heads and with outdated traffic signal equipment. The Commission is considering an alternative that will allow access via the Dexter St. easement. If the alternative is pursued, the intersection and the signals will be upgraded to meet BTD standards. MassHighway reports that the intersection has a crash rate of .09 acc/mev, also significantly lower than the district average (.88 acc/mev).

Noise and Air Quality

The facility will generate noise from truck traffic accessing the site. The operations of loading, unloading, and handling the materials with the loader will be entirely enclosed within the proposed building. At 400 feet, it is estimated that the facility will generate about 60 decibels of noise, which is equivalent to a normal conversation. At 150 feet, it is estimated that the facility will generate about 73 decibels of noise. These noise levels are generated entirely by the trucks accessing and leaving the building.

The proposed materials handling facility will allow future operations to be conducted inside an enclosed building. The building will be designed to control any odors that may develop from its operation.

Solid and Hazardous Waste

On-site investigations have determined that some of the top soil contains metals, PCBs and PAHs, and that there is suspected asbestos-containing material aboveground. The Commission anticipates that excess soil removal and disposal at a permitted waste facility will be required to satisfy the Massachusetts Contingency Plan (MCP) closeout requirements for the site.

Historical and Archaeological Resources

The site and its vicinity contain no properties listed in the 2002 State Register of Historic Places published by the Massachusetts Historical Commission. A Sanborn Fire Insurance Map from 1910 shows three small buildings along the river, one labeled a repair shop. A Suffolk County Atlas Plate from 1912 shows a City of Boston Almshouse on the property, along with three other structures. But a 1938 aerial photograph of the site shows none of those buildings. MBTA constructed a rail station on the property in 1918, which was operational until 1975. A 1978 aerial shows that the rail had been removed. The property

has remained undeveloped since, but it has been used by a construction company for equipment and supplies storage.

Summary

The proposed project will provide an environmental benefit of expanded processing abilities for catch basin, drain, and sewer cleanings and trench excavate, improving the wastewater and drainage infrastructure of the City of Boston. The project change described herein will not result in any significant environmental impacts, or impacts beyond those previously identified. Further, none of the changes trigger any MEPA review thresholds. Therefore, we request that the proposed project change be found insignificant and that no additional MEPA review be required.