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Executive Office of Energy and Environmental Affairs
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May 10, 2019

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

PROJECT NAME	: Proposed Development at 125 Mohawk Trail
PROJECT MUNICIPALITY	: Greenfield
PROJECT WATERSHED	: Deerfield River
EEA NUMBER	: 16005
PROJECT PROPONENT	: Parmar Properties North, LLC
DATE NOTICED IN MONITOR	: April 10, 2019

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

Project Description

As described in the ENF, the project consists of the redevelopment of a 4.86-acre site. The project includes the construction of a 90-room hotel with four stories and a footprint of 15,800 square feet (sf), a 2,390-sf bank with a drive-thru, a 2,046-sf coffee shop with a drive-thru, and a 5,015-sf retail space. The buildings will replace a 100-room hotel that formerly occupied the site and was recently demolished.

Project Site

The site is comprised of a 4.86-acre parcel in southern Greenfield. It is bordered to the west by Miner Street, to the north by a residential neighborhood, to the east by a gas station and wetlands associated with an intermittent stream and to the south by Mohawk Trail (Route 2A). The site is located approximately 1,000 feet (ft) east of a rotary providing access to Interstate-91 (I-91) North and South and the western section of Route 2. Access to the site is provided by full access driveways on Mohawk Trail and Miner Street. A 40-ft wide drainage easement to the Massachusetts Department of Transportation (MassDOT) stormwater system runs diagonally

along the southern section of the site. Prior to demolition, the former hotel included two 2-story buildings with an outdoor swimming pool.

An intermittent stream and associated Bordering Vegetated Wetlands (BVW) form the western boundary of the site. Project activities are limited to the Buffer Zone and the project will not directly impact wetland resource areas. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) number 2501180007B (effective July 2, 1980), the site is not located in the 100-year floodplain.

Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include the alteration of 4.4 acres of previously-developed land, addition of one acre of impervious area (3.24 acres total), generation of 2,861 average daily trips (adt), consumption of 10,735 gallons per day (gpd) of water and generation of 10,735 gpd of wastewater. Water use and wastewater generation are slightly lower than the previous hotel use.

Measures to avoid, minimize and mitigate transportation impacts include signal timing adjustments, bicycle and pedestrian facilities and Transportation Demand Management (TDM) measures to minimize single-occupancy vehicle trips. The project includes the construction of a stormwater management system designed consistent with the Stormwater Management Standards (SMS). It will maintain pre-development peak discharge rates and volumes and remove 85 percent of Total Suspended Solids through the use of Best Management Practices such as deep-sump, hooded catch basins, subsurface water quality units, infiltration chambers and bioretention areas.

Jurisdiction and Permitting

The project is undergoing MEPA review and requires preparation of an ENF pursuant to 301 CMR 11.03(6)(b)(13) because it requires Agency Actions and will generate 2,000 or more adt on roadways providing access to a single location. The project requires a Vehicular Access Permit from MassDOT.

The project received an Order of Conditions (OOC) from the Greenfield Conservation Commission on July 12, 2018 that was not appealed. It requires a National Pollutant Discharge Elimination System (NPDES) Stormwater Permit for Construction Activities from the U.S. Environmental Protection Agency (EPA).

Because the Proponent is not seeking Financial Assistance from the Commonwealth for the project, MEPA jurisdiction extends to those aspects of the project that are within the subject matter of required or potentially required Agency Actions and that may cause Damage to the Environment as defined in the MEPA regulations.

Review of the ENF

The ENF described existing site conditions and the proposed project and its programmatic and physical elements. It identified environmental resources and potential impacts and included a transportation study.

Alternatives Analysis

The ENF reviewed No Build and Hotel Use alternatives to the project. The No Build Alternative would leave the vacant site in its current condition which is not consistent with municipal and regional goals for economic development. The Hotel Use Alternative would include a two-story hotel similar to the prior hotel without any restaurant, retail or commercial uses. This alternative would generate approximately 836 adt, use less water and generate more wastewater than the Preferred Alternative. However, it would have a larger footprint that would encroach upon the City of Greenfield's 25-ft No Disturbance Zone adjacent to BVW.

According to the ENF, the Preferred Alternative will maximize the redevelopment of the site with a smaller hotel footprint and complementary restaurant and commercial uses. The project will generate more vehicle trips than the Hotel Use alternative. The traffic analysis demonstrated that the trips can be accommodated by the roadway network. The project will include a new stormwater management system that will improve water quality compared to the existing drainage system.

Traffic and Transportation

The ENF included a Transportation Impact Assessment (TIA) prepared in conformance with the MassDOT/EEA *Transportation Impact Assessment Guidelines*. It described existing and proposed traffic volumes and operations; roadway, pedestrian, and bicycle conditions; public transit service; site access conditions; and roadway safety issues. The TIA provided intersection capacity analyses documenting traffic conditions under Existing 2018, No Build 2025 and Build 2025 scenarios. It identified mitigation, including roadway improvements and TDM measures that will be implemented to minimize impacts to the local transportation network. The TIA analyzed the transportation impacts of the project in a study area including the following four intersections:

1. Mohawk Trail (Route 2A) at Miner Street;
2. Mohawk Trail (Route 2A) at Newton Street;
3. Mohawk Trail (Route 2A) at Site Driveway; and,
4. Miner Street at Site Driveway.

Limited pedestrian and bicycle facilities are provided in the study area, including a sidewalk on the north side of Mohawk Trail from I-91 to Newton Street and a short segment on the south side of Mohawk Trail. Crosswalks are located at the Miner Street approach to Mohawk Trail and across Mohawk Trail at Newton Street, including a pedestrian push-buttons. The project includes the reconstruction of the sidewalk along Mohawk Trail adjacent to the site, including a crosswalk across the site driveway. Bicycle lanes are present on the south side of Mohawk Trail east of the site. A regional bicycle path system connecting Greenfield, Montague and Deerfield is located outside of the study area. The Franklin Regional Transit Authority operates three routes in the study area, two of which stop one block west of the site.

Unsignalized, full-access driveways are located on Mohawk Trail and Miner Street. Under 2025 Build conditions, access to the site will be provided by a limited access driveway on Mohawk Trail providing right-turn in and left- and right-turn out movements. In addition, two driveways will be located on Miner Street; the southern driveway will provide full access and the

northern driveway will accommodate left- and right-turns into the site and a right-turn only exiting the site. All of the driveways will be controlled by a "Stop" sign.

Trip Generation

Based on the ITE *Trip Generation Manual* 10th edition using Land Use Codes (LUC) 310 (Hotel), 820 (Shopping Center), 912 (Drive-In Bank and 937 (Coffee/Donut Shop with Drive-Thru Window, the project will generate 2,861 adt during the week, including 251 vehicle trips occurring during the weekday morning peak hour and 239 vehicle trips during the weekday evening peak hour. The project will generate 2,855 Saturday Vehicle trips, including 367 vehicle trips occurring during the Saturday midday peak hour. After deducting pass-by trips for all land uses except for the hotel, the project will generate 1,725 weekday adt, including 251 morning peak hour trips and 239 evening peak hour trips and 1,716 Saturday trips, including 367 trips during the Saturday midday peak period. According to the ENF, the analysis did not take credit for the existing trips associated with the hotel or the nearby coffee shop that will be relocated to the project site.

Traffic Operations

The TIA reviewed traffic operations under 2018 Existing, 2025 No Build, and 2025 Build scenarios at the study area intersections. It provided capacity analyses and level-of-service (LOS) designations for each intersection at peak periods. For unsignalized intersections, LOS reflects conditions experienced by traffic on side streets attempting to enter the intersection. The LOS for signalized intersections reflects overall operating conditions, with LOS A denoting limited delays and LOS F denoting long delays and congested conditions; LOS D is considered to be acceptable for urban intersections. The 2025 No Build condition reflects a background traffic growth rate of 0.5 percent per year. The 2025 Build condition reflects the addition of project-generated trips to the No Build scenario.

Under Existing 2018 conditions, the signalized intersection of Mohawk Trail at Newton Street operates at LOS B during all periods, left turns from Miner Street onto Mohawk Trail operate at LOS E or F during weekday peak periods, and left turns from the site drive onto Mohawk Trail operates at LOS E in the evening peak period. All other intersection movements operate at LOS D or better. Traffic operations under No Build 2025 and Build 2025 conditions will be similar to Existing 2018 conditions, except that left turns from the site driveway onto Mohawk Trail will operate at LOS E in the weekday morning peak period and left turns from Miner Street onto Mohawk Trail will operate at LOS F during the Saturday mid-day peak period. According to the ENF, none of these intersections experience traffic volumes that would warrant a traffic signal. In addition, the site and Miner Street have the capacity to accommodate the expected vehicle queues for left turning vehicles and right turns will operate acceptably. The Proponent has proposed to modify the signal timing at the intersection of Mohawk Trail at Newton Street to improve overall traffic operations at the intersection to LOS D or better. The ENF suggested that an extension of the of the eastbound turning lane at the Mohawk Trail at Newton Street intersection would assist vehicles making left turns from the site by providing a median in which vehicles could merge into the through lane. MassDOT does not believe that this is a viable alternative. The Proponent should consult with MassDOT about other potential roadway mitigation measures.

Transportation Demand Management

The TIA included a Transportation Demand Management (TDM) program that will be implemented with the goal of reducing single occupancy vehicle (SOV) trips by visitors of the project. The Proponent will implement the following TDM measures:

- Facilitate ridesharing through a carpool/vanpool matching program;
- Provide welcome packets to new employees detailing available public transportation services, bicycle and walking alternatives, and other commuter options;
- Implement an Emergency Ride Home program for employees; and,
- Provide secure exterior bicycle parking spaces near building entrances.

The Proponent should consider additional TDM measures, including one or more electric vehicle charging stations and preferential parking for electric vehicles. The Proponent should design all roadway and sidewalk improvements to facilitate walking, including pedestrian connections to encourage safe access the bus stops. I encourage the Proponent to further reduce the project's parking supply. The Proponent should consider land banking space on site and constructing remaining parking spaces only when warranted by demand.

Construction

The Proponent should review MassDEP's comments regarding requirements for demolition and construction. The project should be managed in accordance with applicable MassDEP Solid Waste and Air Pollution Control regulations pursuant to M.G.L. c.40, §54. The Proponent should set an aggressive goal for recycling asphalt, brick and concrete (ABC) and other building and demolition materials. The Proponent will prepare a Stormwater Pollution Prevention Plan (SWPPP) to meet EPA NPDES Construction General Permit requirements. I encourage the Proponent and its contractors to comply with MassDEP's Diesel Retrofit Program (DRP) and restrict on and off-road idling to the maximum extent practicable. All construction activities should be undertaken in compliance with the conditions of all State and local permits

Conclusion

The ENF has sufficiently defined the nature and general elements of the project for the purposes of MEPA review and demonstrated that the project's environmental impacts will be avoided, minimized and/or mitigated to the extent practicable. Based on review of the ENF and comments received, and in consultation with State Agencies, I have determined that no further MEPA review is required. The project may proceed to State permitting.

May 10, 2019
Date

K. Theoharides
Kathleen A. Theoharides

Comments received:

04/30/2019	Massachusetts Department of Environmental Protection (MassDEP)/Western Regional Office (WERO)
04/30/2019	Massachusetts Department of Transportation (MassDOT)

KAT/AJS/ajs

Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

April 30, 2019

Matthew Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Greenfield: Proposed Development – ENF
(EEA # 16005)

ATTN: MEPA Unit
Alex Strysky

Dear Secretary Beaton:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Proposed Development project in Greenfield, as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please contact J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Mohler
Executive Director
Office of Transportation Planning

DJM/jll

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cc: Jonathan Gulliver, Administrator, Highway Division
Patricia Leavenworth, P.E., Chief Engineer, Highway Division
Neil Boudreau, Assistant Administrator of Traffic and Safety Engineering
Peter Cavicchi, P.E., District 2 Highway Director
Franklin Regional Council of Governments
Franklin Regional Transit Authority
Department of Planning & Development, Town of Greenfield
PPDU Files

Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

TO: David J. Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E, Manager
Public/Private Development Unit

DATE: April 30, 2019

RE: Greenfield – Proposed Development: ENF
(EEA #16005)

The Public/Private Development Unit (PPDU) has reviewed the Environmental Notification Form (ENF) for the Proposed Development project in Greenfield. The 4.86-acre site, located at 125 Mohawk Trail (Route 2A) in Greenfield, currently consists of a vacant two-story, 100-room hotel as well as a vacant small business. The project proposes to construct a four-story, 90-room hotel, an approximately 2,046 square foot drive-thru coffee/donut shop, an approximately 2,390 square foot bank with drive-thru, and space for three retail establishments totaling approximately 5,015 square feet.

Based on the information presented in the ENF, the Full-Build project is expected to generate 2,861 weekday vehicle trips and 2,855 Saturday vehicle trips. The project will include provision for 173 parking spaces. The project exceeds the Massachusetts Environmental Policy Act (MEPA) threshold for trip generation (2,000 new trips).

Site access is proposed via an improved right-turn entry/full exit driveway intersecting Mohawk Trail (Route 2A) and two new driveways (one full-access, one full entry/left-turn exit only) intersecting Miner Street. A Vehicular Access Permit from MassDOT will be required because Mohawk Trail (Route 2A) is a state-owned roadway.

The ENF includes a Traffic Impact Study (TIS) prepared in conformance with the current MassDOT/EOEEA *Transportation Impact Assessment Guidelines.*

Study Area

The TIA study area includes the following intersections:

- Route 2A (Mohawk Trail) at Miner Street;
- Route 2A (Mohawk Trail) at Newton Street;
- Route 2A (Mohawk Trail) at Mohawk Trail Site Driveway;
- Miner Street at Miner Street Southerly Site Driveway; and
- Miner Street at Miner Street Northerly Site Driveway.

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The study area is considered to be acceptable and adequate in capturing the impact of the project on area roadways.

Trip Generation

The TIA includes trip generation rates that were calculated using the Institute of Transportation Engineers (ITE)'s *Trip Generation Manual* (10th Edition). As presented in the ENF, trip generation was calculated based on Land Use Code (LUC) 310 – Hotel, LUC 820 – Shopping Center, LUC 912 – Drive-in Bank, and LUC 937 – Coffee/Donut Shop with Drive-Thru Window. Accordingly, the site is expected to generate 2,861 weekday daily vehicle trips and 2,855 Saturday daily vehicle trips, with 251 vehicle trips occurring during the weekday morning peak hour, 239 vehicle trips occurring during the weekday evening peak hour, and 367 vehicle trips occurring during the Saturday midday peak hour. Pass-by rates were applied to all land uses except for the hotel land use for the traffic operations analysis.

The Proponent is allowed as part of its trip generation calculations to take credit for the 100-room hotel on the project site which closed in January 2018. The traffic operations analysis developed for the TIS incorporated the hotel use.

We note that the fitted curve equation should be referenced for the trip generation calculations, with the exception of LUC 820 when small square footages are proposed. Use of the fitted curve for LUC 912 would yield an additional 75 weekday trips; this figure is small enough to render the trip generational calculations valid for the traffic operations analysis.

Safety

The TIS includes a summary of crash rates derived from MassDOT for the continuous three-year period of 2014 through 2016. The crash rates at all of the study area intersections are lower than MassDOT Statewide and District 2 averages. None of the study area intersections are listed as Highway Safety Improvement Program (HSIP)-eligible crash clusters for 2013-2015.

A safety analysis was also conducted for the I-91 Exit 26 Rotary, although the Rotary is not listed as a study area intersection. Several improvements were implemented at the Rotary in 2014 to improve safety and operations. The TIS notes that police reports are in the process of being obtained from the City of Greenfield and Massachusetts State Police regarding crash records at the Rotary following implementation of the improvements.

Site Access Improvements

Three site access points are proposed. The existing site access location on Route 2A will be retained and modified from a full access driveway to a right-turn entry/full exit driveway. The Proponent may be asked to refine the driveway concept plan during the access permit plan to ensure movements to and from the site driveway along Route 2A do not conflict with movements to and from Miner Street. Potential treatments could include channelization of the driveway is proposed to prevent left-turning vehicles from Route 2A eastbound, providing

signage indicating that vehicles should access the project site from Miner Street, and providing a raised median to provide refuge for exiting vehicles to perform a two-stage left-turn at both the Miner Street approach and the Route 2A site driveway. The Proponent should note that the site access driveway on Route 2A should conform to MassDOT standards regarding maximum width (24 feet) and maximum radii (30 feet).

Two access points will be located on Miner Street. The southerly site driveway will be retained and allow full access. The northerly site driveway will allow full entry to the site with left-turn only exit movements. "Left Turn Only" signs will be installed at the northerly driveway on Miner Street.

Traffic Operations

Capacity analyses were conducted for the weekday morning and weekday evening peak periods for existing, 2025 No-Build, and 2025 Build conditions. All signalized intersections and unsignalized intersection approaches under state highway jurisdiction are reflected as operating at a Level of Service (LOS) D or better under 2025 Build conditions. Signal timing improvements are proposed at the Route 2A/Newton Street intersection to address poor LOS for the Newton Street northbound left/through movement.

The TIA presents an alternative that would extend the Route 2A eastbound left-turn lane at the Route 2A/Newton Street intersection to provide additional merging space for vehicles exiting the development from the Route 2A site access. MassDOT does not find this to be a viable alternative but invites the Proponent to consult with MassDOT District 2 regarding other roadway treatments to alleviate this condition.

Multimodal Access and Facilities

The ENF includes an analysis of pedestrian, bicycle, and transit facilities in the study area. Sidewalks are present along the northern side of Route 2A, and a crosswalk exists to connect pedestrians from Newton Street to the project site. Sidewalks are not currently provided along Miner Street, which is under City of Greenfield jurisdiction. There are no dedicated bicycling provisions along Route 2A in the study area. The Franklin Regional Transit Authority operates three routes in the study area, with two of these routes serving a stop one block west of the project site. The Proponent should ensure that the proposed mitigation would allow for safe and efficient access to/from the bus stops.

Conceptual Plans

Any proposed mitigation within the state highway layout and all internal site circulation must be consistent with a healthy transportation design approach that provides adequate and safe accommodations for all roadway users, including pedestrians, bicyclists, and public transit riders. Guidance on healthy transportation design is included in the MassDOT *Project Development and Design Guide*. Where these criteria cannot be met, the Proponent should provide justification, and should work with the MassDOT Highway Division to obtain a design waiver.

Parking

The TIS proposes provision for 173 parking spaces, which is in line with City of Greenfield requirements. We encourage the Proponent to investigate reducing parking or land banking of parking spaces until and unless needed.

Transportation Demand Management Program

To reduce site trip generation, the TIS includes a Transportation Demand Management (TDM) program. The Proponent details the following TDM measures in the ENF with the goal of reducing vehicle trips by visitors of the project:

- Provision of welcome packets to new employees detailing available public transportation services, bicycle and walking alternatives, and other commuter options; and
- Provision of a shuttle service from the hotel to the airport and surrounding community.

The Proponent is invited to consult with MassDOT to help further develop and implement the mitigation program. At a minimum, bicycle racks should be offered at each of the project site's land uses to encourage this mode of travel.

MassDOT recommends that no further environmental review be required based on transportation issues. The details of the above and any other access-related issues can be addressed during the permitting process for the project. If you have any questions regarding these comments, please contact me at (857) 368-8862 or Michael Clark at (857) 368-8867.

MassDEP
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Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

April 30, 2019

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Massachusetts Environmental Policy Act Office
Alex Strysky, EEA No. 16005
100 Cambridge Street, 9th Floor
Boston, MA 02114-2524

Re: Proposed Redevelopment, 125 Mohawk Trail - Rt. 2A, Greenfield

Dear Secretary Beaton,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Environmental Notification Form (ENF) submitted for the Proposed Redevelopment, 12 Mohawk Trail – Rt. 2A, Greenfield, MA (EEA #16005). The project is proposed by Parmar Properties North, LLC (the Proponent). The applicable MassDEP regulatory and permitting considerations regarding drinking water, wastewater, air pollution, solid waste, and waste site cleanup are discussed.

I. Project Description

The project proposes on the 4.9 acres site is to demolish an existing 100-room hotel and construct a multi-use development that includes a 4-story, 90-room hotel, a drive-through coffee shop, a bank, 3 retail spaces and associated parking. Although the building footprint will decrease by 0.23 acres, the total impervious surface will increase by 1 acre to 3.24 acres. The project is proposed to be constructed in phases and result in a total of 0.62 acre building footprint, 3.24 acres of impervious surface and 2,025 new vehicle trips per day. Stormwater will be managed through below grade treatment and detention chambers.

The project site is served by municipal water and sewer and the proposed water use and wastewater generation is expected to decrease by 265 gallon per day. There are no MassDEP permits required for this project. The project received an Order of Conditions from the Greenfield Conservation Commission in July 2018.

Environmental impacts associated with this project include:

- 1.00 acres of new impervious surface,
- 2,025 new vehicle trips (2,861 trips), and
- Construction of Subsurface Stormwater treatment and detention chambers galleries.

II. Required Mass DEP Permits and/or Applicable Regulations

Drinking Water
310 CMR 22.00
Underground Injection Control
310 CMR 27.00
Wastewater
314 CMR 7.00
Air Pollution
310 CMR 7.00
Solid Waste
310 CMR 16.00
Bureau of Waste Site Cleanup
310 CMR 40.000

III. Permit Discussion

Wetlands and Waterways

MassDEP issued a file number and comments for his project in 2018; the Greenfield Conservation Commission issued an Order of Conditions on July 12, 2018.

Bureau of Water Resources

Drinking Water

There are no MassDEP permits for this proposed work. MassDEP recommends continued consultation with the Greenfield Water Department to ensure adequate capacity and compliance with City requirements. In addition, MassDEP recommends compliance with all cross connection requirements.

Underground Injection Control

The plans detail the use of Stormwater Detention Chamber. The Proponent should be aware that all underground stormwater control structures that infiltrate to groundwater are subject to the jurisdiction of the MassDEP *Underground Injection Control (UIC)* program. The structures must be registered with MassDEP UIC program through the submittal of the appropriate registration *BRP WS-06 a, b & c - Registration of Discharges to Underground Injection Wells / BRP WS-06 - Modification to an Existing UIC Registration* to the MassDEP Boston Office. The UIC program contact in Boston is Joseph Cerutti. The following MassDEP websites provide guidance, regarding BMPs, registration and forms:

- http://www.mass.gov/eea/agencies/massdep/water/drinking/underground-injection-control.html#3,
- http://www.mass.gov/eea/agencies/massdep/water/drinking/underground-injection-control.html#2 and,
- http://www.mass.gov/eea/agencies/massdep/water/drinking/underground-injection-control.html#6.

Wastewater

There are no MassDEP permits required for this proposal but MassDEP recommends continued consultation with the City Department of Public Works regarding any sewer design and connection.

Bureau of Air and Waste

Air Quality

Construction and Demolition Activities
The Proponent has acknowledged they will comply with appropriate regulations. To clarify, construction and demolition activity must conform to current Air Pollution Control Regulations. The Proponent states they will implement measures to alleviate dust, noise, and odor nuisance conditions that may occur during the construction and demolition activities. Such measures must comply with the MassDEP's Bureau of Air and Waste Regulations 310 CMR 7.01, 7.09, and 7.10. the following link provides additional information regarding the required notification prior to Construction or Demolition: https://www.mass.gov/files/documents/2018/09/14/aq06.pdf

The Proponent should also be aware of the requirements for the Adhesives and Sealants used during construction relative to the Volatile Organic Compounds (VOC) content of the Adhesives and Sealants, pursuant to 310 CMR 7.18 (30).

Construction Period Air Quality Mitigation Measures
The Proponent commits to use of compliant ultra-low sulfur diesel (ULSD) with a sulfur content of 15 ppm pursuant to 40 CFR 80.510.

Boilers/Generators/Emergency Generators
The applicant should be aware that there are air approval/permit or registrations requirements for boilers, stationary turbines, reciprocating engines, emergency generator sets and other internal combustion engines (e.g. those associated with power generation units) that may or may not be applicable to this project. If any energy needs will be met through the combustion of liquid, gaseous, or solid fuels then such systems, may need to be certified (certain boilers depending upon their heat input capacities, and engines and turbines depending upon their rated power outputs) by the MassDEP pursuant to 310 CMR 7.26 and 310 CMR 70.00, may comply with 310 CMR 7.03, or approved by MassDEP pursuant to 310 CMR 7.02 unless otherwise exempted in 310 CMR 7.00. In addition, major sources are subject to the operating permit program and may be subject to New Source Review requirements. The proponent, if subject to these programs may seek a federally enforceable restriction to limit its emissions in order to avoid certain requirements. The Proponent should refer to the regulations to determine if any approval/permit or registration threshold is met by any on-site combustion units being proposed for the project and should evaluate its approval/permitting/registration requirements/options.

Solid Waste

The Proponent shall properly manage and dispose of all solid waste generated by this proposed project pursuant to 310 CMR 16.00 and 310 CMR 19.000, including the regulations at 310 CMR 19.017 (waste ban).

Urban soils may be contaminated to some degree by previous land use. The Proponent is advised to manage any potentially hazardous materials encountered appropriately. Excavated material may be managed in accordance with MassDEP policy *COMM-97-001 "Reuse and Disposal of Contaminated Soil at Massachusetts Landfills"* if the

excavated/generated solid waste material demonstrate characteristics of hazardous waste or the presence of other contaminants (i.e. lead paint, PCB contaminated or PCB containing construction materials).

In addition, older construction may include asbestos cement pipes or asbestos coated gas lines. Therefore, the Proponent is advised to be aware of the potential for asbestos containing components within and outside of the building footprint and manage regulated asbestos and asbestos-containing waste material as special wastes in accordance with 310 CMR 19.061.

Asphalt, brick and concrete (ABC) generated through crushing and reuse on-site must be handled in accordance with regulation and policy. Otherwise, the proponent may need to obtain a site assignment and facility permit for the crushing activity and a Beneficial Use Determination (BUD) for the reuse of the crushed material. More information regarding the handling of ABC, and a copy of the 30-day notification form may be found at the following website:
http://www.mass.gov/eea/agencies/massdep/recycle/reduce/using-or-processing-asphalt-pavement-brick-and-concrete-.html.

The BUD regulation (310 CMR 19.060) establishes levels of assessment for four categories of beneficial use. These regulations would be applicable to reuse of any materials generated by this project that would otherwise be considered solid waste.

The project proponent should be advised that construction activity at the site must comply with both Solid Waste and Air Quality Control regulations. The appropriate Solid Waste provisions addressing this include M.G.L. Chapter 40, Section 54.

Hazardous Waste

Any hazardous wastes generated by the construction/demolition activities or universal wastes such as mercury containing lamps or mercury thermostats, must be properly managed in accordance with 310 CMR 30.0000.

If any hazardous waste or waste oil is generated at any of the sites, the Proponent must ensure that proper registration with MassDEP and management in accordance with 310 CMR 30.0000.

Bureau of Waste Site Clean Up

There are no identified disposal sites governed by the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, M.G.L. c. 21E, and the Massachusetts Contingency Plan (MCP) within the project site. However, there are adjacent properties that have a Permanent Solution under the MCP. If soil contamination is encountered during work activities, the Proponent should retain a Licensed Site Professional (LSP); the MCP details procedures to follow for the parties conducting remediation and cleanup work. MassDEP staff are available for guidance.

Spills Prevention
A spills contingency plan addressing prevention and management of potential releases of oil and/or hazardous materials from pre- and post-construction activities should be

presented to workers at the site and enforced. The plan should include but not be limited to, refueling of machinery, storage of fuels, and potential future on-site activity releases.

IV. Other Comments/Guidance

If you have any questions regarding this comment letter please do not hesitate to contact Catherine Skiba at (413) 755-2119.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Michael Gorski
Regional Director

cc: MEPA File