



The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Deval L. Patrick
GOVERNOR

Timothy P. Murray
LIEUTENANT GOVERNOR

Ian A. Bowles
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1181
<http://www.mass.gov/envir>

February 6, 2009

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

PROJECT NAME : Combined DPW Facility Remediation
PROJECT MUNICIPALITY : Southbridge
PROJECT WATERSHED : Quinebaug
EEA NUMBER : 14363
PROJECT PROPONENT : Town of Southbridge
DATE NOTICED IN MONITOR : January 7, 2009

Pursuant to the Massachusetts Environmental Policy Act (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** the preparation of an Environmental Impact Report (EIR).

As described in the Environmental Notification Form (ENF), the project includes remediation activities conducted in accordance with the Massachusetts Contingency Plan (MCP) through the removal of soil contaminated by polychlorinated biphenyls (PCBs) on the Southbridge Department of Public Works (DPW) site. Contaminated soils will be excavated from Cotton Pond and a portion of an unnamed brook downstream from the pond. The soils will be dewatered and placed on-site in upland areas and subsequently capped with asphalt to prevent migration. The project also includes the installation of a drainage system and construction of a stormwater detention pond to control flows from the DPW site. The project site presently contains a 66,000-square foot (sf) building which has been recently redeveloped for use by the DPW. Subsequent to the MEPA site visit on January 21, 2009, the Town provided a

memorandum issued on January 26, 2009 clarifying the extent of potential wetland impacts associated with the project.

Estimated project impacts to wetland resource areas include 8,000 sf of Bordering Vegetated Wetlands (BVW), 400 linear feet of Bank, and 56,000 sf of Land Under Water associated with Cotton Pond. While the permit applications estimate a conservative dredge volume of 6,500 cubic yards (cy), the Proponent has indicated that the actual amount of material to be dredged may range from 3,750 cy to 5,000 cy. Final sediment removal volumes will be determined after a final round of toxicity testing. Additional wetland impacts may be associated with approximately 350 linear feet of remediation along the unnamed brook. The estimated volume of stream sediment removal was determined to be between 25 and 30 cy based upon an excavation depth of 6 inches along the 350-foot length of the brook. The project will also result in the creation of 4.7 additional acres of impervious area as a result of paving over the dredge spoils in accordance with the remediation plan and the paving of the existing gravel parking area for with the DPW.

Jurisdiction

The project is undergoing MEPA review pursuant to Sections 11.03(3)(b)(1)(d) and 11.03(3)(b)(1)(f) of the MEPA regulations because it requires a State agency action and will result in the alteration of 5,000 or more square feet (sf) of BVW and the alteration of ½ or more acres of other wetlands. The project will require a Section 401 Water Quality Certificate (401 WQC) from Massachusetts Department of Environmental Protection (MassDEP) and a Section 404 Permit from the United States Army Corps of Engineers (U.S. ACOE). The project must obtain a Stormwater Construction General Permit and file a Remediation Notice of Intent and Stormwater Permit with the United States Environmental Protection Agency (U.S. EPA). The project will require an Order of Conditions from the Southbridge Conservation Commission.

Since the project will be receiving financial assistance from the Commonwealth through the State Revolving Fund, MEPA jurisdiction extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined by the MEPA regulations.

Wetlands

Wetland impacts associated with the project are concentrated within the 1.3-acre man-made Cotton Pond and the downstream unnamed brook. Historic uses of the property have led to the contamination of Cotton Pond and a portion of the unnamed brook with PCBs. The unnamed brook flows through a two-foot by two-foot box culvert north of Cotton Pond, through the pond, and continues southeast downstream through another culvert underneath Guelphwood Road. Some remediation efforts within the brook will be conducted off-site of the DPW property via access from abutting properties.

The amount of material to be removed from Cotton Pond has been estimated subsequent to the collection of sediment thickness data and toxicity testing to determine the extent of PCB

contamination. The entire volume of sediment in Cotton Pond is approximately 5,000 cy, 75 percent of which is anticipated to require remediation and removal (3,750 cy). Additional testing may result in the removal and remediation of all pond sediment in order to meet the required cleanup goals. Cotton Pond will be temporarily dammed and a bypass line installed during the dredging operations. Cotton Pond will be drained and contaminated sediment will be excavated with bulldozers and/or excavators and stockpiled for dewatering. Dewatered sediment will be transported to the adjacent soil placement area and graded in place. Contaminated Bank and BVW will also be excavated and placed in the contaminated soil area. Following grading and placement of the subgrade, the entire contaminated area will be covered with six inches of asphalt to create a cap in compliance with the Toxic Substances Control Act (TSCA).

The Proponent has collected chemical data from the unnamed brook to determine the extent of downstream PCB migration from Cotton Pond. Based upon these data, the Town has estimated that approximately 350 linear feet of the stream will require remediation. This estimate will be refined through further stream characterization testing, including toxicity testing, to be performed as part of a Stage II Environmental Risk Characterization. At this time, the anticipated method of sediment removal from the unnamed brook will be through the use of a vector truck and a series of temporary dams to facilitate removal operations.

MassDEP has provided several comments on the project which should be addressed during the permitting process or in accordance with the MCP:

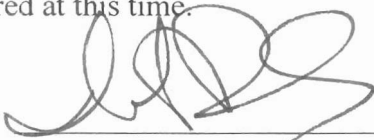
- The Town should provide details on the methodology for restoring Bank and BVW upon completion of the remediation work.
- The Town should clarify the location of the temporary brook bypass on permit plans. MassDEP has recommended that the bypass should be constructed and implemented in a manner which will not cause off-site or downstream turbidity to wetlands.
- During the permitting process, the Town will be required to prepare a Stormwater Report with Checklist to document that the MassDEP Stormwater Management Regulations will be complied with to the maximum extent practicable.
- The Town should develop an action plan to restore the natural flow through Cotton Pond without causing off-site or downstream turbidity to wetlands.

Hazardous Waste

The MassDEP comment letter states that MassDEP conducted a comprehensive audit of the project site in 2007 under Release Tracking Number 2-0013610. The Town should continue to work with the MassDEP Bureau of Waste Site Cleanup as the project progresses. Additionally, as requested by MassDEP, the Town should create a comprehensive erosion and sediment control program to reduce the likelihood of hazardous materials migrating from the project site during remediation activities.

Based on the information in the ENF and after consultation with relevant public agencies, I find that no further MEPA review is required at this time.

February 6, 2009
Date



Ian A. Bowles

Comments received:

- 01/13/2009 Massachusetts Historical Commission
- 01/27/2009 Massachusetts Department of Environmental Protection – CERO

IAB/HSJ/hsj