Message

From: Ed Burt [eburt.hd@gmail.com]
Sent: 10/24/2022 12:27:56 PM
To: Nierenberg, Kara [Nierenberg.Kara@epa.gov]; garry waldeck [Garry.Waldeck@state.ma.us]; twatson@hopedale-ma.gov; Diana Schindler [DSchindler@hopedale-ma.gov]; Bruce Thompson [brucet@demaximis.com]
Subject: Hopedale follow-up

Flag: Follow up

Hi Kara,

Per Chris' last email, we understand that you have taken over the project manager responsibilities for the NMI site – congratulations. Regarding the Hopedale issues, progress has been made, but as discussed at the last Hopedale Water & Sewer Commission meeting, there are still concerns to be addressed.

Related to the transportation route, the list of communities (5.2.1 Communities Affected by Shipment of Waste Material) has been updated to include Hopedale. However, the trucking route is directly through downtown Milford, which is not even on the community list.

Upton and Grafton remain on the list, yet neither of those towns are on the trucking route. GURR has facilities in Grafton, Upton and Hopedale, which continues to raise the question if GURR ever properly identified the Hopedale location.

Please send copies of the bid requirements and GURR's response.

The Transportation and Disposal plan was also updated to include a reference to the fact that GURR's Hopedale railyard is within a Zone II Water restriction area. However there are no site precautions, such as ground area protective barriers, nor any systematic emergency procedures reflecting the importance of this Zone II Water protected area.

We appreciate the clarification, from both Chris and the DEP, that the soils are "not considered hazardous waste, will be in fully sealed containers before they arrive, and will not be stored on site..... it is Mass DEP's opinion that it is not a prohibited activity in the Zone II."

Beyond the actual transport, concerns remain regarding how long the soils will be at railyard and while at the railyard, will they be in closed or open gondolas, how will they be protected?

The soils while at the railyard, and the railyard itself remain a major concern. As discussed, GURR does not provide Hopedale any information regarding the activities within the railyard, so we are dependent upon the EPA to ensure the overall safety of this Zone II water protected area.

For example, we understand that the trucking volume may not be an issue across the roads of Hopedale, but have no sense at all if the trucking volume is a problem within the railyard in relation to the overall railyard activities. Especially during the winter months.

A site transporting fly-ash and contaminated soils, without any specific water protection and emergency procedures, seems to be a site on a path towards a serious problem.

Chris confirmed that the NMI soil transportation is not scheduled to start until next spring/summer, but addressing these issues sooner than later is very much appreciated.

Regarding the timeframe - Is GURR a subcontractor to transport similar materials for any other EPA projects?

Thank you for your time and attention to this.

Thank you.

Hopedale Water & Sewer Commission

Ed Burt