

November 22, 2024

CDW Consultants
Attn: Brian J. Miller, LSP
4 California Avenue
Framingham, MA 01701

**Re: Comments on Draft Post-Closure Release Abatement Measure Plan
Proposed Red Line Hi-Rail Access Tunnel
62 Whittemore Avenue
Cambridge, Massachusetts**

Dear Mr. Miller:

Verdantas LLC (Verdantas) prepared this letter at the request of Alewife Neighbors, Inc. to provide comments on the August 2024 Draft Post-Closure Release Abatement Measure (RAM) Plan that was submitted by CDW Consultants on behalf of Delve Underground and the Massachusetts Bay Transportation Authority (MBTA). The Draft RAM Plan was prepared for the excavation and disposal of contaminated soils during the construction of a tunnel at the Former W.R. Grace & Co. disposal site at 62 Whittemore Avenue (the Site) to access the MBTA red line subway.

Multiple release conditions have been reported at the Site, and investigations identified volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), metals, petroleum hydrocarbons cyanide, and asbestos fibers in soil. The tunnel is proposed to be excavated in the central portion of the Site, near a former 18,000-gallon naphthalene aboveground storage tank. Excavation depths for the tunnel installation are expected to range from 2 to 30 feet below grade.

We have the following observations and comments (presented in no particular order) regarding the Draft RAM Plan:

1. The Draft RAM Plan proposes to manage dust and asbestos fibers by continually misting soils that are excavated and loaded and using a biodegradable liquid copolymer designed for dust suppression. We note that, for the redevelopment activities conducted at the Site by IQHQ-Alewife, LLC, excavation is conducted under tents with negative pressure and HEPA air filtration for exhausted air. During the public meeting, it was stated that tents could not be installed due to the need to install sheet piles for the excavation. However, the Draft RAM Plan apparently doesn't consider that tents could be constructed after sheet pile installation, and the soil excavation could then be conducted under tents with negative pressure and HEPA air filtration. The RAM Plan should consider revising the dust and asbestos fiber management to use misting during sheet pile installation, followed by soil excavation under tents with negative air pressure and HEPA filtration.
2. The Draft RAM Plan states that up to 8,000 cubic yards of excess construction soils will be generated during the project and that 3,250 cubic yards is contaminated by oil or hazardous material at concentrations equal to or greater than applicable Reportable Concentrations. In the September 30, 2024 virtual public meeting, the total volume of soil was identified as 9,400 cubic yards and the volume of soil containing asbestos was identified as 3,400 cubic yards. The soil volume should be re-evaluated and the RAM Plan should include the correct estimated soil volume.
3. Section 11.4 of the Draft RAM Plan states "A sheet piling or similar groundwater containment system may be used so that only temporary dewatering would be necessary."

However, Section 11.3 indicates that sheet piling will be installed for the soil excavation. It is unclear if the sheet piling referenced in Section 11.4 is the same sheet piling described in Section 11.3 or if there is additional sheet piling (or similar groundwater containment) that will be installed to manage groundwater. The RAM Plan should clarify if additional sheet piling or groundwater containment will be installed, and the expected locations and details of the additional sheet piling or groundwater containment.

4. Section 11.3 of the Draft RAM Plan notes that a temporary clean cap may be placed as a working surface. The details of this temporary clean cap, including composition, location, and thickness were not provided in the Draft RAM Plan. Additional details of this temporary clean cap should be provided, along with the criteria that will be used to identify whether this temporary clean cap will be placed.
5. Section 11.3 of the Draft RAM Plan states that, to protect the integrity of the existing soil cap, an additional 6 inches of clean soil will be placed along the outside perimeter of the sheet piling. The lateral extent of this clean soil from the sheet piling was not identified, but would presumably be wide enough so that the construction equipment does not damage the underlying cap. The RAM Plan should depict the extent of the clean soil on a figure in the RAM Plan. The RAM Plan should also identify the type of soil that will be used to create this cap (e.g., loam, sand, etc.).
6. The Draft RAM Plan indicates that a protective soil cover consisting of 6 inches of clean fill is present throughout the project area. In addition to placing a layer of clean soil in the work area, an additional protective cap should be placed in unpaved areas where construction vehicles are expected to travel, to prevent damage to the existing protective cover from wheels or tracks such that the existing protective cover won't be damaged or disturb underlying soil potentially containing asbestos.
7. The RAM Plan should consider placing a geotextile layer over existing exposed soil before placing imported soil for the temporary cap.
8. The Draft RAM Plan does not specify what will happen to the imported clean cap/soils after the completion of the RAM activities. It is unclear if this material will be left in place and re-graded or whether this material will be removed. The RAM Plan should include additional information on what will happen to this material after the construction work is complete.
9. The source of the water used for misting is not identified in the Draft RAM Plan. The RAM Plan should be revised to include information on the source of the water used for misting operations.
10. Information on the biodegradable liquid copolymer is not included in the Draft RAM Plan. The RAM Plan should be revised to include information on the biodegradable liquid copolymer, including ingredients and safety data sheets. Information should also be included about when the copolymer will be used. Section 13.2 indicates that dust will be managed by misting soil continuously when soil is being loaded into trucks, but there is no information about when the copolymer will be used.
11. The Draft RAM Plan notes that, if odors are encountered in soils, foam suppressants may be used as controls. Information regarding these foam suppressants is not included in the Draft RAM Plan. The RAM Plan should be revised to include information on the foam suppressants that may be used, including ingredients and safety data sheets.
12. A statement could be included in Section 14 indicating that, following construction activities, the final protective cover will be maintained in accordance with the existing Activity and Use Limitation and the 2006 Protective Cover Monitoring Plan.

If you have questions regarding the contents of this letter, please contact either of us using the contact information below.



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