

Alewife Study Group  
December 8, 2024

Brian Miller, LSP  
CDW Consultants, Inc.  
4 California Avenue  
Framingham, MA 01701

CC:  
Brad S. Nicoll, PE, MBTA  
George Kober, PE, MBTA  
Joe Rigney, PE – EOR Delve Underground

Comments on Draft Post-Closure Release Abatement Measure Plan  
MassDEP Release Tracking Number 3-0000277  
Proposed Red Line Hi-Rail Access Tunnel  
62 Whittemore Avenue  
Cambridge, Massachusetts

Dear Mr. Miller:

As part of our review of the Draft RAM Plan for this project, the Alewife Study Group (ASG) asked Alewife Neighbors, Inc. (ANI), a 501(c)3 non-profit group, if they would commission an independent review of the plan. ANI accepted ASG's proposal, and retained Verdantas LLC (Verdantas), an environmental science, engineering, and consulting firm.

Verdantas's report is attached. ASG requests that you and the MBTA address Verdantas' observations and concerns, and adds the following comments.

ASG would like to highlight that the review by an LSP from Verdantas recommends that: "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."

And, as stated in ASG's comments by David Bass and Joel Nogic, also submitted today, "The Activity and Use Limitation attached to this site in 2006 forbids any activities which "present greater risk of harm to health, safety, public welfare or the environment," and so requires that the Soil Management Plan, prepared prior to the commencement of any activities that disturb the soil below the existing protective cover, be in accordance with the Cambridge Asbestos Protection Ordinance, if applicable. (As outlined [in David and Joel's comments], CAPO is clearly applicable here)."

It is our understanding that when excavation between the sheet piles exceeds four feet below grade, bracing with welded attachments will be needed. We know that welding within a tent structure would not be safe. However, as the excavation of fill approaches the depth of native soil (which is not expected to contain asbestos contamination that is present in fill near the surface), we recommend that the plan offer the option of temporary (non-welded) bracing, either internally between the sheet piles or externally supported from the outer side of the piles. This would allow excavation under tents, with negative air pressure and HEPA filtration, to continue for the relatively small amount of remaining fill soil. After excavation reaches native soil, tents could be removed without further potential for exposure to asbestos in excavated soil.

We agree that placement of a geotextile layer over existing exposed soil, in addition to unpaved areas where construction vehicles are expected to travel, to ensure that any soil that is later removed to ensure proper grading for compensatory flood storage does not compromise the protective soil cover.

Finally, we believe that selection of this site is problematic, because the soil is heavily contaminated by asbestos, and the site is only about 150 feet upwind from the highly used Russell Field youth sports complex. However,

if the site location will not be changed, we restrict our comments to the Draft RAM Plan for this location.

Thank you for considering our comments. Please contact us with questions, or if it would be helpful to discuss any of the issues represented in these comments.

Sincerely,

For the Alewife Study Group,

Mike Nakagawa  
Joel Nogic