

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:

We are members of the Alewife Study Group (ASG), a City of Cambridge Representative Neighborhood Group, that has been deeply involved with activities and issues at the former W.R Grace site, now IQHQ, as well as Russell Field and nearby areas, since 1995.

ASG is the neighborhood representative for the Activity Use Limitation (AUL) and Public Involvement Plan (PIP) of the former W. R. Grace, now IQHQ, site.

As described in our other letters, ASG has engaged extensively with IQHQ, other community groups, and City of Cambridge Councilors and staff, regarding the development and community benefits at the IQHQ site.

Over the last three months, ASG has engaged intensively with the MBTA and the other groups listed above regarding the MBTA's proposed Red Line

Hi-Rail access tunnel at Alewife. As far as we can tell, the MBTA spent over a year coordinating on the selection of this problematic site with the City of Cambridge and IQHQ without any public input, until the simultaneous initiation of the RAM plan process (scope of this letter) and the NOI for the Conservation Commission.

We are community volunteers with years of experience related to the site and direct experience in the creation of important regulatory restrictions on the site including the Activity Use Limitation (AUL) and the Cambridge Asbestos Protection Ordinance (CAPO). Despite the urging of both IQHQ and the City of Cambridge to engage ASG sooner, the MBTA failed to meaningfully engage with our group, and the community more broadly, until these two regulatory processes were begun.

The lack of engagement is especially concerning considering that:

- ASG worked extensively with IQHQ to reduce tree impacts in the proposed work area, to protect it with a restrictive covenant or conservation restriction, and to provide two scenic overlooks just to the north and south of the proposed site (see Special Permit Notice of Decision for case number 387 and associated materials for 36-64 Whittemore Avenue (Alewife Park)).
 - Shortly after these robust, public negotiations between the community, IQHQ, and the City of Cambridge were finalized, the MBTA decided to target that exact area that was to be protected from disturbance (as a public benefit for the community) with this proposed access tunnel.
- The selected site is located within what was called the “Harvey Street Sludge Landfill” a private disposal site operated by W.R. Grace from 1960 - 1979 according to [the Massachusetts Department of Environmental Protection](#)
 - As has been established in our other letters - both W.R. Grace and the prior owner (the Dewey and Almy Chemical Company) disposed of significant amounts of loose fiber asbestos on the site and it is very likely that deliberate disposal would have occurred in their designated landfill site.

We strongly support the MBTA and understand the need for a hi-rail access tunnel in the vicinity of the Alewife Station. As regular riders of the Red Line, we fully support investing in and improving performance of this important subway route. We appreciate the care, thought and time invested in the creation of the Draft RAM Plan, but we have some concerns. We have been working in good faith to ensure that, if the tunnel must go at this site, the impacts to the surrounding community and the ecology are mitigated as much as possible.

With this background, and in addition to our other communications, we offer these final comments:

Location	RAM Plan Text	Comment or Concern
p2, §3.1, ¶1	“The overall Disposal Site and Site Property is an approximate 24 acre property.”	The area of the IQHQ property is approximately 27 acres.
p2, §3.1, ¶3	“The Site is relatively level with elevations of approximately 6 to 8 feet above sea level within the Disposal Site Boundary.”	This should be 6 to 8 meters, not feet.
p3, §3.2, ¶1	“A major redevelopment of portions of the property was proposed in the mid 1980s.”	This is misleading. There was no development of the Grace Property in the 1980s. Please clarify that the proposal never progressed past the conceptual stage.
p3, §3.2, ¶1	“Most of the remainder of the property outside of the Site boundaries is currently being redeveloped for office and laboratory use.”	This is misleading. The site is in the middle of a 4-acre conservation area. To the north of the conservation area is the IQHQ development, to the south is the Alewife MBTA plaza and Jerry’s Pond, soon to be a public park.
p3, §3.2, ¶2	“Historical aerial photographs dated 1938, 1947, 1952, 1955, 1960, 1969, 1978, 1987, 1995, 2003, 2004, 2006, 2008, 2010, 2012, 2014, 2016, 2018, 2021, and 2022 were reviewed to obtain a history of the Site.”	These photographs should have been included in the RAM Plan but were not.

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p2, §3.1, ¶1	“The overall Disposal Site and Site Property is an approximate 24 acre property.”	The area of the IQHQ property is approximately 27 acres.
p4, §4.1, ¶1	“depth to groundwater ranges from approximately 3.40 to 8.78 feet below grade, with an average of 5.5 feet.”	In Table 1 (p29, Ground Gauging Data July 9, 2024), depth to groundwater is reported as 9.6 feet at location J-15 and 10.63 feet at L-24. Please explain this discrepancy and include these data in the discussion.
p4, §4.1, ¶2	“the source of asbestos in soil was estimated to more likely be from the demolition of former buildings.”	This is misleading. No aerial photos or historic site plans indicate the presence of any buildings in the Site, nor does the site history described in §3.2 describe buildings on the Site area, only north of the Site. Furthermore, there is no significant correlation between the presence of asbestos in soil samples and the observation of possible building debris (concrete, brick, glass) in soil boring logs (asbestos was found in 13 of the 20 sampling locations where construction debris was identified, but also in 24 of the 44 sampling locations where construction debris was not observed). Additionally the selected site is located within what was called the “Harvey Street Sludge Landfill” as described earlier in this letter. This makes the potential for dumping of asbestos fiber dust and other manufacturing waste products higher at this portion of the site than other areas where buildings were located. While it is not impossible that the source of the asbestos is building demolition, this conclusion is speculative at best.
p5, §4.2, ¶1	“it was estimated that the asbestos contamination may have been due to the demolition of structures comprised of asbestos containing materials since many of those buildings were known to have been covered with asbestos siding.”	See comment above.
p6, §5.1, ¶3	“PID screening results are included in Table 1.”	Table 2, not Table 1.

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p2, §3.1, ¶1	“The overall Disposal Site and Site Property is an approximate 24 acre property.”	The area of the IQHQ property is approximately 27 acres.
p6, §5.1, ¶4	Asbestos was detected in a few locations at depths of 4-6 feet.”	Three locations, specifically, in one sample by PLM (J-17) and in two samples by TEM (J-21 and L-25).
p6, §5.1, ¶5	“Only one of the samples exceeded the MCP RC of 4 mg/kg.”	Should specify that the exceedance was significantly higher than the MCP RC (428 mg/kg).
p7, §7.0, ¶4	“The Site and surrounding area are served by the Massachusetts Water Resource Authority (MWRA) municipal drinking water supply system. Drinking water is obtained from surface water reservoirs located in central and western Massachusetts.”	While it is true that Cambridge is able to access MWRA water, our primary water supply is a local system of reservoirs that converges at Fresh Pond. Fresh Pond was historically connected to the proposed site hydrologically. The RAM plan should accurately reflect that Cambridge has a local water supply near the proposed site.
p8, §8.0, ¶2	“Asbestos fibers, naphthalene and other secondary contaminants remain in the area of the proposed tunnel. These concentrations do not exceed any UCLs.”	Massachusetts has not promulgated a UCL for asbestos. Does this affect the conclusion that a focused risk assessment and feasibility study are not required?
p10, §11.3, ¶1	“in order to provide a more robust working surface and to protect the integrity of the existing soil cap, an additional 6 inches of clean soil will be placed in areas along the outside perimeter of the sheet piling”	Will this be left after completion of the tunnel? Will it be accounted for in calculations for compensatory flood storage?
p10, §11.3, ¶1	“Soil will be excavated in a manner to prioritize those soils with asbestos fibers to allow for a safer work environment while providing access to the remaining non-asbestos soils.”	It is unclear to us what this comment means. How will these soils be prioritized and/or handled in a method different from the other soils?
p10, §11.3, ¶2	“Excavate asbestos containing soils located between sheet piling (depths ranging from 2-6 feet)”	Would be clearer to say “depth of excavation ranging from 2-6 feet.”

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p2, §3.1, ¶1	"The overall Disposal Site and Site Property is an approximate 24 acre property."	The area of the IQHQ property is approximately 27 acres.
p10, §11.3, ¶3	"Soils containing asbestos fibers (top 2-6 feet) will be directly loaded onto trucks"	Better to say "top 6 feet" rather than "top 2-6 feet."
p13, §13.2	Dust Control	Please revise consistent with any changes to NTAAWP (See comments below).
p13, §13.3, ¶3 and pp313-4	PM ₁₀ Dust Monitoring and Appendix E	Given that naphthalene is a primary contaminant of concern, it is worth articulating why it isn't included in the constituent list when calculating the target PM ₁₀ .
p13, §13.3, ¶3	"The calculated concentration was 151 ug/m3. As a conservative measure, the lower NAAQS for particulate pollution at PM10 of 150 ug/m3 will be used."	The values 151 µg/m3 and 150 µg/m3 would be different only if PM ₁₀ could be determined in the field to at least three significant figures, which is unlikely. Therefore, characterizing the use of the lower number as "a conservative measure" is not justifiable.
p138, §2.0, ¶1	"The Contractor will not proceed with bulk loading or disposal of ACWM before 10 business days..."	The acronym "ACWM" has not been defined. Presumably the reference is to asbestos-contaminated soil, so a more appropriate acronym might be ACS. (This comment applies to all references to ACWM throughout the NTAAWP.)
p139, §3.0, ¶1 (NTAAWP p2)	"The overall Property is an approximate 24-acre property"	Should be 27-acre.
p139, §3.0, ¶2 (NTAAWP p2)	"Figure 2 shows the proposed construction."	Figure 2 is the site plan that shows the location of the truck washing station, dewatering equipment, and perimeter air monitoring, but no construction details. Better to say "Figure 2 shows the area of proposed construction."
p139, §3.0, ¶3 (NTAAWP p2)	"The non-traditional work practices described herein will not result in the discharge of visible emissions of asbestos to the outside air"	Better to say "...described herein is designed to prevent detectable discharge of asbestos to the outside air." While "visible emissions" may be an appropriate threshold of concern for fugitive dust, the threshold for release of asbestos fibers is the PCM detection limit. Please revise all references to visible emission of asbestos in the NTAAWP accordingly.
p139, §3.0, ¶3 (NTAAWP p2)	"will keep ACM adequately wet"	The acronym ACM has not been defined. Presumably the reference is to

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		asbestos-contaminated soil, so a more appropriate acronym might be ACS. (This comment applies to all references to ACM throughout the NTAAWP.)
p140, §3.0, ¶3 (NTAAWP p3)	“will not pose significant risk to public health, safety or the environment”	Better to say “is designed to prevent significant risk...”
p140, §3.0, ¶3 p140, §3.0, ¶5 p140, §12.0 (NTAAWP p3 and p10)	“and is otherwise consistent with the requirements of applicable federal, state and local laws and regulations”; “in compliance with federal, state, and local regulations”; “This work plan does not negate the responsibility of the property owner, the contractor, subcontractors and consultants from complying with all other applicable federal, state and local regulations.”	Local laws and regulations require adherence to the Cambridge Asbestos Protection Ordinance (CAPO). The practices described in this NTAAWP are not consistent with CAPO. Please revise the work plan to correct this oversight.
p140, §3.0, ¶5 (NTAAWP p3)	“AASoils that are asbestos-containing”	The term “AASoils” is not defined.
p141, §4.2, ¶3 (NTAAWP p4)	“utilizing two (2) layers of 0.45-rubber roof membrane”	Does this mean 45 mil rubber roof membrane?
p142, §4.3 (NTAAWP p5)	“using appropriately sized hoses from building spigots”	There are no building spigots anywhere near the Site. Please clarify the source of water to be used.
p143, §5.0	Dust Control	Soil wetting is appropriate and consistent with CAPO when soils are disturbed during sheet pile driving. Wetting is also appropriate for native soils, which have been found not to be contaminated with asbestos. However, widespread asbestos contamination has been found in the fill, particularly in the top four feet. Excavation of these soils should be done in adherence with CAPO. In its own development of this site, IQHQ adhered strictly and successfully to CAPO over a much larger area than the T is proposing to disturb, so the feasibility of CAPO has been demonstrated.

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p2, §3.1, ¶1	“The overall Disposal Site and Site Property is an approximate 24 acre property.”	The area of the IQHQ property is approximately 27 acres.
p143, §5.0, ¶1 (NTAAWP p6)	“Clean (municipal) water sources will be used for dust control from a nearby fire hydrant or the equivalent use of water tankers provided by the contractor.”	§4.3 refers to “amended water surfactant will consist of a mixture of 50% polyoxyethylene ester and 50% polyoxyethylene ether, and biologically safe soap,” not clean municipal water. Will the hydrant at the Alewife Station T plaza south of the Site be close enough that tanker trucks will not be necessary? If so, how will surfactants be added to the dust suppression water?
p143, §7.0 (NTAAWP p8)	p143, §7.0 “Any individual perimeter air sampling result that meets or exceeds 0.010 f/cc potentially related to Project work will result in the temporary stoppage of dust generating activities”	IQHQ employed an action level of 0.007 f/cc during their recent construction project. Please justify the higher action level.

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,

David Bass, ScD, CHMM (retired)
Eppa Rixey