



Town of Reading
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CONSERVATION COMMISSION
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MS E1
2008

May 4, 2006

Ms. Phillis Johnson-Ball
Surface Transportation Board
1925 K. Street NW
Washington, DC 20423

Attention: Finance Docket No. 34797, New England Transrail, LLC

Dear Ms. Johnson-Ball:

The Town of Reading received the notice of environmental review dated April 7, 2006 concerning the proposed New England Transrail (NET) facility in Wilmington and Woburn. Please accept these comments as part of the public record for the environmental review.

The Reading Conservation Commission is the Town board primarily responsible for protecting wetlands, water resources, and other natural resources within the Town of Reading. The Commission received the notice of environmental review from the STB on April 10, 2006. We sent a request for additional information to the e-mail address provided in the notice on April 12, 2006 (attached). We have not yet received any response to that request. Thus, the comments in this letter are based solely on the limited description of the work conveyed in the STB notice. The STB notice did not provide any contact information for NET. The Conservation Commission hereby requests that STB and/or NET provide a copy of all materials submitted to date to the STB for the present petition, and any subsequent documents required by STB for future public review. Alternatively, please provide complete contact information for any and all local offices where such materials are or will be made available for public review.

The Town of Reading abuts Wilmington and Woburn to the east. Reading shares local and interstate roadways, railway lines, surface waters, and aquifers with Wilmington and Woburn. Thus, activities in Wilmington and Woburn are likely to have environmental impacts in Reading. Trains, trucks, and other vehicles entering and leaving the site are likely to travel through Reading, causing traffic, air quality, noise, and dust impacts, and increasing the risk of spills

during traffic accidents. The northern half of the site is located within the Zone III recharge area of the Reading public wells. The Olin contamination plume has already forced closure of the Maple Meadow Brook Wells in Wilmington. The Reading wells are down gradient. Maple Meadow Brook is a tributary of the Ipswich River in Reading, and any surface contamination leaving the NET site is likely to reach Reading. Many of the materials proposed for handling at the facility (salt, municipal solid waste, construction debris, liquid pumpable materials, aggregates, etc.) are likely to contain leachable contaminants that will pollute surface and ground water.

The information provided in the STB notice raises the following questions:

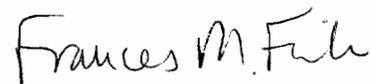
1. Where are all the existing contaminated soils and groundwater plumes in and near the site and in what directions are contaminants moving?
2. What work does Olin plan to carry out in the near and distant future to clean-up the site and down-gradient contaminated areas?
3. How long will the clean-up process take?
4. What parts of the site beyond the contaminated areas will be needed for staging and stockpiling during the clean-up?
5. To what extent do the proposed NET structures and roadways overlap the areas needed for the Olin clean-up?
6. What areas will NET need to use for staging during construction beyond the proposed structures?
7. How will NET handle demolition of existing structures?
8. How will NET handle stormwater runoff during and after construction, and how will it coordinate with clean-up activities if construction begins before clean-up is finished?
9. On the site layout plan attached to the STB notice, it appears that only one of the three transloading areas would be located inside of a building. How will loading be controlled in wet and windy weather?
10. The STB notice states that bulk materials, including salt, would be stored on an open asphalt surface over the DAPL area. Two of the contaminants in the DAPL area are chloride and sodium. The proposed salt storage is highly likely to increase the levels of these contaminants, and open salt storage is not legal in Massachusetts. How long would bulk materials be stored? How would they be protected from wind and rain? How would release of contaminants into the surrounding soils and groundwater be prevented?
11. The STB notices states that construction and demolition waste and also municipal solid waste would be unloaded onto an uncovered concrete floor, inspected for hazardous waste, shredded, and then loaded by conveyor belts into train cars. What would happen to any hazardous waste found? What training and equipment would the staff on site use? How would this operation be protected from wind and rain? How would release of contaminants into the surrounding soils and groundwater be prevented?
12. The STB states that 400 trucks would enter and leave daily and that 15 rail cars would be generated daily "initially". What is the "initial" period? What constraints are expected on total volume handled during the initial period? What is the expected volume at full capacity?

13. Can local roads, some of which already have serious defects in levels of service, accommodate the additional truck traffic? What off-site traffic improvements are anticipated and what environmental impacts would result from such improvements?
14. What is the region to be served by the facility? What is the regional need for such a facility? Where would the materials be taken after they leave the facility and what is the capacity of the recipient(s)?
15. Would a better alternative use for this site be for commuter rail services? What are the regional needs and planning goals for additional commuter services?
16. The site plan in the STB notice provides shows one existing and four proposed stormwater management basins. What are the soils and groundwater characteristics in the proposed basin areas? How extensive is the proposed grading and excavation? Would the basins infiltrate water, and if so, how would the infiltration affect the hazardous wastes on and around the site? Has a complete stormwater management analysis been prepared that complies with the MA Department of Environmental Protection's Stormwater Management Policy?
17. Does the new petition include mitigation proposals that conform to the conditions recommended by SEA for the previous petition by NET?

The Reading Conservation Commission calls on the Surface Transportation Board to require NET to prepare a full Environmental Impact Statement (EIS) under the National Environmental Policy Act for the proposed transfer facility. The EIS should address impacts on surface water quality and quantity, groundwater quality and quantity, stormwater management, flooding, wetland resource areas, air quality, odors, noise, dust, traffic, public and private drinking water supplies, and wildlife habitat. The EIS should address impacts at the site in Wilmington and Woburn, within the towns through which materials will be trucked to the facility, and within the towns which will receive the materials shipped out of the facility. Most importantly, the EIS should address the impact of the construction and operation of the NET facility on the on-going assessment and clean-up of the Olin Superfund contamination within and beyond the site. The Conservation Commission believes strongly that remediation of the Olin Superfund site has not yet reached a point where there is sufficient information to make plans for redevelopment, and that NET should wait until the Olin site is substantially cleaned up and stabilized before they begin construction.

Thank you for your consideration of these comments.

Sincerely,



Frances M. Fink
Conservation Administrator