



REC'D - TOWN MANAGER

TOWN OF WILMINGTON PH 1:37

121 GLEN ROAD  
WILMINGTON, MA 01887

TOWN OF  
WILMINGTON, MASS.

PLANNING & CONSERVATION  
DEPARTMENT

(978) 658-8238  
(978) 658-3311  
FAX (978) 658-3334

**Memorandum**

**To:** Mike Caira, Town Manager  
**cc:** Lynn Goonin Duncan, AICP, Director of Planning & Conservation,  
Wilmington Conservation Commission  
**From:**  Robert J. Douglas, Assistant Director of Planning & Conservation  
**Subject:** Eames Road Redevelopment  
**Date:** October 17, 2003

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After discussing the redevelopment plan for the Olin property with members of the Wilmington Conservation Commission, the several concerns were voiced regarding the redevelopment's effect on the environment. Primarily, it is alarming that a new Environmental Impact Report (EIR) was not triggered for this redevelopment. The project as presented is not a "project change", but in fact represents a completely new project, and requires additional scrutiny by all relevant agencies. First and foremost, we request that a new EIR be required.

There are few places in the Commonwealth that have experienced such adverse environmental degradation as the Olin site. While much has been done to address and mitigate contamination of the past, the Commission is concerned that cleanup efforts be continued and commitments made to the Town and the Commission be carried out, and that the site be protected from future infractions and contamination.

- 1) The site has several Orders of Conditions still open. Each of these permits addresses monitoring or cleanup of previous spills and on site pollutant components. Each of these permits must be complied with, and each of them states that if a transfer of ownership occurs, the new owner must be notified in a timely fashion. Additionally it is the

Commission's contention that transfer of ownership must be predicated on Olin's commitments being met and the submission of a system wide cleanup plan detailing all aspects and funding of these efforts.

- 2) In a prior document the Town of Wilmington Conservation Commission was assured that a large wooded portion of the Olin site would be transferred to their control.

*The applicant has voluntarily agreed to restrict development of the remainder of the property from the wetlands associated with the south ditch to the southern property line. This will be accomplished with a Conservation Restriction. (Order of Conditions #344-733, page 2, special condition 22).*

This transfer has not taken place. Prior to a change in ownership this land must come under the control of the Commission, with the protection of Conservation restrictions granted in perpetuity. The new owner of the Olin site must be aware of these restrictions and be informed that these conservation areas are strictly off limits.

- 3) The most recent plan submitted, (*Proposed Rail Reload Facility, Site Layout, 7-21-03*), shows a detention pond in close proximity of the area know as "Lake Poly". It is the understanding of the Commission that the construction of low elevation swales and low elevation water retention was forbidden in this area.
- 4) The previous project submission had required that an onsite structure would provide a predetermined area of impervious surface, which would provide an integral part of the protection of subsurface decontamination efforts. The current site development plan shows a temporary structure that does not appear to comply with this requirement.
- 5) The Commission would ask that more land be restored as wetland and put into Conservation restriction, if the new owners will make less use of the bulk of the property than had been proposed in the previous plan.
- 6) The current proposal declares that truck traffic will generate approximately 200 truck trips a day. Much to the Commission's dismay, this has been characterized as a "benefit" to the region, without acknowledging the negative impacts this will have on Wilmington. Increased truck traffic would be to the detriment of the resources under the Commissions jurisdiction. The increase in exhaust, automotive fluid spills, dropped materials, and noise would have an undeniable negative cumulative environmental effect.
- 7) The nature of materials that will be handled at the re-load center is of great concern to the Commission. The list presented is extremely general. Unfortunately, mixed materials as listed for transport are notorious for contaminants that are not described in the shipping manifest. While the project proponent may state that "the facility will not reload any hazardous materials", it is common knowledge that mixed waste often includes contaminants. Unconsolidated materials such as construction debris, is often laden with carcinogens that the shipper may not be aware of; yet the surrounding area may become adversely

effected none the less. The applicant's list which includes; Chemical products, liquids, non hazardous wastes, soils, wood products, and any other products which can be transported; is far too general. All too often municipalities are harmed by materials brought inside their communities that they are unaware of. The list presented is so general (IE: any other products) that it essentially gives carte blanche to bring in any materials the owner wishes. The Olin Corporation, and the sites previous owners had in many ways the same free hand. The community and environment still suffer hardships as new chemical compounds are found within the area. As the recent discovery of NDMA shows; it is in the best interest of a community to have control of and be aware of all materials brought into its confines.

Water & Sewer Department  
INTEROFFICE MEMORANDUM

DATE: March 14, 2003

TO: Michael A. Caira, Town Manager

FROM: Michael J. Woods, Superintendent  
Water & Sewer Department

RE: New England Transrail Information

The Water Department is very concerned with the latest proposal from New England Transrail, LLC. The rail yard project is substantially different from the original plan to redevelop 51 Eames Street as a warehouse. Our concerns are as follows:

1. No additional chemicals should be allowed on this site until a complete inventory of the substances in the ground are determined and understood. The mixing of toxic chemicals with chemicals that may be brought in could form other toxic compounds that may further deteriorate the environment and our water supply.

Olin Corporation and the DEP have told the Town for a decade that the contaminants of concern are chromium, Ammonia, Sulfate, Sodium and chlorides. In October of 2002 the Town's water system is shut down due to nitrite. (See enclosure.) On February 28, 2003 5 of the Town's 9 wells are taken off line due to the discovery of nitrosodimethylamine (NDMA). (See enclosure.) These problems in the Town's water system are directly related to the Olin site contamination. Unknowns and the interaction of chemicals have compromised people's health and safety.

2. The DEP, after more than 12 years of study, are still not sure how to proceed with remediation of this site due to its complexity. Increasing the chance of spilling additional chemicals on this site will only further complicate an extremely complex site.
3. The conditions in the a Maple Meadow Brook Aquifer system are changed significantly now from the conditions that existed when the Remedial Action Plan was approved for the site by the DEP. Specifically, the Town's wells located in the aquifer were pumping up to 3 million gallons of water per day. These are the 5 wells that are now off-line (not pumping).

These changes will have a major effect on ground water flow. The Town's water system could be further damaged by moving pockets of contamination into a more vital area. In addition, private wells in the area that have "tested clean" could now be contaminated.

Major changes in the aquifer should be understood before any type of remediation or redevelopment take place.



REC'D - TOWN MANAGER

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TOWN OF WILMINGTON

1 ADELAIDE STREET  
WILMINGTON, MA 01887

TOWN OF  
WILMINGTON, MASS

THE OFFICE  
OF FIRE CHIEF

VOICE (978) 658-3346  
FAX (978) 988-9181

interoffice memorandum

To: Michael A. Caira  
From: Chief Daniel R. Stewart  
Subject: New England Transrail  
Date: October 15, 2003  
CC:

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I have reviewed the revised narrative and site plan for the proposed rail lines and truck reload facility at 51 Eames Street.

My concerns as expressed in the response to your initial proposal remain unchanged. The handling of hazardous materials are not indicated in the proposal but remain a possibility in future amendments. This concern would only be eliminated with a legally binding agreement to preclude this site from any use of hazardous materials at any time.

I have attached my previous comments since I believe those concerns to still be valid.

  
Chief Daniel R. Stewart

DRS/lkd  
Attachment



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FAX (978) 988-9181

interoffice memorandum

To: Michael Newhouse, Town Counsel  
From: Chief Daniel R. Stewart  
Subject: Class III Railroad Submission & Rail Yard Construction Proposal  
Date: June 3, 2003  
CC:

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In response to the Class III Railroad Submission and Rail Yard Construction Proposal for the property at 53 Eames Street, I have the following concerns:

1. The letter submitted by Mr. Ronald Klemper to the Town of Wilmington identifies the property at 53 Eames Street when I believe the Olin address to be 51 Eames Street.
2. The proposed use identifies service to nearby plastic resin manufacturers. This would most certainly involve transportation and handling of hazardous materials which appears to be inconsistent with the proposal regarding handling of non-hazardous chemical products.
3. Societal impacts to the immediate area appear to be in conflict with the statement "The proposed action will not result in any significant adverse societal impacts". Increased diesel exhaust emissions from railroad and trucking operations alone represent a significant impact.
4. Impacts on public services are misrepresented as insignificant when in my opinion as Fire Chief they would be substantial. Initial delays at the Eames Street crossing of two times per day would surely increase in frequency and duration as activities increase. I also believe that fire department involvement with a previously proposed beverage

warehouse versus the current proposal is also mischaracterized. The current proposal would require increased fire department involvement in areas of emergency, planning, training, compliance mitigation capability and response.

5. I also have a concern for increased seismic activity created by railroad operations and their relationship to on site containment of in ground contaminants.
6. Offloading of products may significantly increase ambient noise levels and potential for accidental release of vapors, liquids or solids.
7. Increased trucking in the area will increase the chance for accidents involving hazardous materials and non hazardous materials. Negative impacts may affect nearby neighborhoods and increase demand on public safety services.

In conclusion, I believe that this area of Wilmington has been negatively impacted by many sources for many years. This type of development would undo the progress that we have made to improve the quality of life in Wilmington and contradicts the impacts as submitted in the proposal by New England Trans Rail, LLC.

Chief Daniel R. Stewart

DRS/lkd

cc: Michael A. Caira, Town Manager  
File (2)