



**C.C.N.**  
**Concerned Citizens Network**  
**14 Powder House Circle**  
**Wilmington, MA 01887**

Mr. Neil Sullivan  
ICF Incorporated  
9300 Lee Highway  
Fairfax, VA 22031

Attn: Finance Docket #34391 Environmental Comment

October 28, 2003

Dear Mr. Sullivan,

I would first like to describe to you the Concerned Citizens Network of Wilmington. It is a network comprised of many community residents involved in the environmental issues, which plague our town. We have considerable concerns regarding the proposed land use by New England Transrail and the potential adverse environmental impact this operation may cause to an already compromised and ill-defined property at the 51 Eames Street property presently owned by the Olin Chemical Corporation. It is our understanding that the Surface Transportation Board's Section of Environmental Analysis (SEA) is initiating an environmental review. We respectfully request that a full project evaluation with the most stringent environmental standards be conducted under the National Environmental Policy Act of the New England Transrail proposal to construct and operate rail lines and a multi-commodity track-rail reload facility to serve metropolitan Boston prior to the redevelopment of this property. We refer to our United States Congressional leadership in their letter before the Surface Transportation Board of July 11, 2003 seeking such intensive review and concur with them in demanding that "all environmental issues be fully addressed and mitigated before any construction could begin."

The Olin Chemical Corporation's property has a long history pertaining to the contamination and migratory chemical impact of constituents both on and off the property. These constituents are responsible in the past for the intermittent shut down of our public drinking water wells and is now responsible for the complete shut down of 60% of our water supply affecting approximately 22,000 people in Wilmington. It is listed as a Tier 1A site; receiving the worst rating in the Massachusetts tier rating listing of contaminated sites.

The recent discovery of NDMA (n-Nitrosodimethylamine) in our public drinking water wells and at extraordinary high levels at the Olin test well (87D), is the reason why our drinking water supply has been drastically reduced and the reason why are wells are shut down indefinitely. It is unknown as to how long Wilmington residents have been

exposed and have been consuming this probable carcinogen. The federal health agency ATSDR (Agency for Toxic Substances and Disease Registry) is conducting a distribution study to determine the extent of public exposure. This study is congruent with an already existing study by the Bureau of Environmental Health Assessment of the Massachusetts Department of Public Health, to determine an environmental etiology of abnormally high incidences of childhood cancers including Brain Tumors, Hodgkin's and Non-Hodgkin's Lymphoma and Leukemia. We the residents of Wilmington feel strongly that this projected land use has elements which will add to the serious environmental condition which now exists at the property. This property is responsible for many hardships Wilmington residents are presently facing and is responsible for human and environmental health threats

The Olin property has contaminated two watersheds: The Aberjona and the The Ipswich.

**Aberjona:** There is a geological divide on the property, which has contamination impacting the South property and East Ditch region, which empties into the Aberjona watershed. At this time, United States Environmental Protection Agency (EPA) has filed a Human Health and Ecological Risk Assessment and is reviewing a public comment prepared by Cambridge Environmental Inc. on behalf of the public. Further analysis of the negative impacts of the Aberjona from industry and other responsible parties including the Olin property will be determined as the EPA continues their study.

**Ipswich:** This watershed is also adversely impacted as a plume of chemicals has migrated west and northwest into our Zone II aquifer of the Maple Meadow Brook and it is within this plume many chemicals in compound and free states exist and it is in this plume where NDMA was found.

New England Transrail, LLC list commodities, which they plan to transport onto the site for transfer from train to trucks. This list is an "expected" list and they state that the list is not limited to what they have included. In fact they have included "any other products which can be transported in intermodal containers". The list they chose to include as aggregates, brick, coal, cement, cereals and grains, chemical products, construction debris, liquids, lumbar newsprint...etc all would pose additional risk if an accident occurred on this property.

Any importation of chemicals and debris as stated above before there is a complete revelation of the chemicals of concern and before an appropriate remedial plan is implemented would be negligent. It would be contrary and indeed counter-productive to introduce this property and land to such a project of this magnitude. The EPA is analyzing the chemicals of concern listing to determine which chemicals have been not previously considered by the Olin consultants, and which chemicals need to be included and addressed in their remediation. This research, at the request of the Massachusetts Department of Environmental Protection is being conducted at the EPA-Las Vegas laboratory for expert analysis.

There is no question that complete analysis of the property, both watersheds, and the Maple Meadow Brook aquifer needs to be performed and steps have been put in place for this analysis within the last 6-9 months. The most recent events and discovery clearly

demonstrates that the previous redevelopment plans were based on site analysis and conclusions, which have been insufficient and incorrect and that there exists many unknown factors which could further negatively impact our community.

Of significant concern is the lack of commitment from the proponents that they will not transport nuclear waste. In a meeting, which had to be arranged by our federal representatives, New England Transrail principals would not promise not to transport nuclear waste.

We feel that their open-ended and vague statement of what they expect to transport, without limitation to their own listing and will transport any material in intermodal containers, leaves the possibility of such nuclear waste transport onto this site.

Since that meeting in June, they have filed for an exemption before the Surface Transportation Board, and filed for a Notice of Project Change with the Massachusetts Executive Office of Environmental Affairs MEPA office. They have yet to schedule another meeting with the community or with our representatives.

Of equal concern to the residents is that New England Transrail continues to purport that their operation is consistent within a defined industrial area without giving any attention to the residents and abutting neighborhoods of Wilmington and Woburn. In that same meeting in June, New England Transrail representatives answered questions about the noise generated from this kind of operation. They stated it would be necessary to build a noise retaining wall to reduce the significant and annoying noises. Their MEPA filing does not indicate any such wall construction, only the deployment of sound baffles during unloading times.

Due to the sensitive material, which will be transferred on the property and transported from the property, there exist possible accidental spills and releases. It has been determined that the South Wilmington-North Woburn area is over-burdened by both ground water and air pollution. A TURA (Toxic Use Reduction Act) representative had identified to our community group a tremendous amount of air toxic releases in this region every year. In a subsequent meeting, the Office of Technical Assistance (OTA) representatives identified these concerns and advised an emergency response system be set up between both communities consistent with EPA standards. That system has not been initiated and with this highly risky project, the two communities are quite nervous and concerned. Evacuations of the area community have taken place from releases at the Olin facility and the residents are not comfortable with this added threat.

We have concerns about the truck traffic generated by this operation. The proposed route of Eames to Woburn street to the newly constructed interchange at Presidential and Commerce Way is highly dangerous for heavy truck loads during inclement times both on the roads in Wilmington and onto the single lane "fly-way". Residents along Eames Street and off Woburn Street will be adversely affected with this fleet of trucks. Any other route will adversely affect the community as well. The project does not have specific plans on how they will remedy the present road conditions to properly transport these materials.

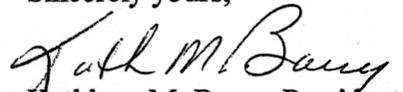
In conclusion, the Concerned Citizens Network feels it imperative that a full Environmental Impact Report and NEPA study should be initiated to further analyze the mitigating affects of the proposed rail construction, warehouse-distribution building, the truck traffic as it relates to the property, the site, its plume (s), and its impact on the both communities.

The residents and citizens who abut this area are concerned with:

- Odors associated with such transfer stations
- Noise associated with trains and heavy axle truck traffic
- Truck traffic during nighttime hours, which will raise havoc at such hours.
- Potential industrial accidents within the facility and potential accidents with the 200 plus trucks entering and leaving the facility and local traffic.
- Exposures to hazardous materials with any mishap at the facility and with citizens along the transportation routes
- Environmental impact of potential spillage and releases of said material and further contamination of the already compromised property, with wetland considerations and surface water contamination
- Lack of a comprehensive emergency response for the region

On behalf of the members of the Concerned Citizens Network, I would like to thank you for the opportunity to comment to the STB's Section of Environmental Analysis regarding this project.

Sincerely yours,

  
Kathleen M. Barry, President  
Concerned Citizens Network

Enclosures:

Federal Legislative Comment to the STB of July 11, 2003  
Town of Wilmington's Environmental Consultant, GeoInsight comments to the STB of July 10, 2003

Cc:

The Honorable Edward Kennedy  
The Honorable John Kerry  
The Honorable John Tierney  
The Honorable Edward Markey