

Salem Harbor Station Redevelopment

Summary of Key Comments from EFSB and DEIR Reviews

March 7, 2013



Traffic

- Estimated truck/barge trips associated with material delivery, construction and demolition should be provided
- Offsite staging and marshaling yard should be identified
- Traffic impacts on Bentley School must be described
- Operational impacts should account for the post-demolition areas available for potential redevelopment

Environmental Justice

- Environmental Justice Analysis following procedures described in EPA Environmental Justice Policy should be provided

Air Quality

- Several MA regulatory requirements (310 CMR 7.01, subsections of 7.02, 310 CMR 7.10, and 310 CMR 7.26) missing from relevant regulations; description of requirements not entirely accurate
- Clarification needed of what modeling domain/grid was considered and if all off-site sources are included in model
- Confirm if increment consuming sources are included in PSD model
- More thorough analysis of carbon capture and storage (CCS) for PSD permit required
- More detail regarding NOx offsets to support a conclusion that NOx offsets will be available. MassDEP will not issue a Comprehensive Plan Approval if proponent does not secure 200 to/yr of NOx offsets
- Indicate if combustion turbines will comply with GHG emission limits

Solid and Hazardous Waste

- Evaluate demolition and remediation requirements and update schedule accordingly
- Develop Construction Waste Management Plan for decommissioning and demolition (written controls for chemical storage and detail for on-site handling and storage)

Operations Safety

- Provide details regarding sound level program to be conducted during construction
- Confirm ongoing site exposure and environmental sampling program, and clarify that alarm systems will be installed to notify community in event of catastrophic system failures
- Consider requiring 3rd party EHS auditing in addition to contractor auditing

Visual/Historic/Cultural Resources

- Provide consultation with MHC/local historic Commission regarding the plant being 50+ years old
- Conduct site survey to support finding of no structures/sites affected
- Consider potential impacts to underwater archaeological site from potential pipeline/barge trips

Land Use/Zoning

- Evaluate potential impacts of increase in commercial vessel traffic on personnel, fuel/consumables and equipment associated with escort and response services
- Address compliance with City Zoning Ordinance in regard to obtaining a special permit as the site is within the Wetlands and Flood Hazard Overlay District (wetlands, flood hazard and coastal high hazard areas)
- Address fact that the site is located in the Designated Port Area

Noise

- Explain the reason the metrics (Leq, L10, L50) were chosen and what they represent
- Report 24-hour day-night noise level or average noise level for comparison with EPA guidelines
- Include potential vibration impacts in analysis
- Evaluate noise impacts with regards MassDEP noise policy which clearly includes construction noise (documents currently state that there are no state regulations regarding construction noise)
- Confirm construction noise levels and mitigation (predicted L90 levels will be significantly above the allowable 10 dBA increase)

Wetlands/Water

- Identify wetland resources area boundaries and if they are subject to jurisdiction
- Indicate depth to groundwater as required by MEPA for confirmation of Stormwater BMPs
- Provide documentation of floodplain layer adjustment
- Provide information related to Chapter 91 and water dependency of project

Stormwater

- Evaluate providing a stormwater pump station
- Identify how stormwater will be collected and treated to meet NPDES requirements
- Evaluate potential BMPs (deep sump catch basin) given potential for high groundwater
- Provide discussion of stormwater management in event of large rainfall event coinciding with storm surge

Wastewater

- Provide data regarding peak daily flow and likelihood of being coincident with SESD WWTF PDF
- Clarify the treatment and ultimate disposal of wastewater generated by the proposed facility. ENF certificate states no discharge to Harbor, while EFSB/DEIR contradicts

Water Supply

- Verify City of Salem has adequate permitted supply and capacity to provide to the proposed and future development