



Town of Wilmington
Office of the Town Manager
121 Glen Road
Wilmington, MA 01887-3597

PHONE: (978) 658-3311

FAX: (978) 658-3334

TTY: (978) 694-1417

WWW.WILMINGTONMA.GOV

February 5, 2021


TO: Board of Selectmen
School Committee

RE: Elementary Schools Statements of Interest

On February 3, 2021 Board Chairman Jonathan Eaton, School Committee Chairperson Jennifer Bryson, Dr. Glenn Brand, Paul Ruggiero, George Hooper and I met with representatives from the Massachusetts School Business Authority (MSBA) at their request to discuss the Town's submission of six (6) Statements of Interest (SOIs). The Town was advised that MSBA received 70 CORE SOIs. Wilmington is one of 15 new districts being considered for invitation in the MSBA CORE program. If the Town is invited into the program such a determination would be made at an MSBA Board of Directors meeting in April or June. The Town would have 270 days from the "commencement date" to obtain an appropriation for feasibility and schematic design. Other intermediate deadlines within the 270 days include the establishment of a school building committee, completion of an online MSBA questionnaire and completion of a review of enrollment.

Various representatives from the MSBA posed questions about existing enrollment at the Wildwood Early Childhood Center, the uses of the current school space and program/educational constraints posed by the existing facility. Questions were also asked of Mr. Hooper about the condition of various aspects of the building. The MSBA inquired about the Town's financial capacity to commit to a school project and whether the Town has other building projects in the works. A decision remains to be made as to whether MSBA representatives will conduct a site visit of the school to further assist in their determination of our status with the program. Prior to this Zoom session the MSBA was provided with a thirty-two (32) page document containing exterior and interior pictures and descriptions that included classrooms, offices, restrooms, the kitchen and the crawl space beneath the building. The Statement of Interest documents recently submitted by the District for the Wildwood Early Childhood Center, along with all five (5) other elementary schools are available on the Wilmington Public School's website https://www.wpsk12.com/our_district/facilities.

The Town was advised that, to be invited into the program, MSBA expects the Town to clarify the options around which there is community consensus with respect addressing the six (6) elementary schools. Factors that would be important to convey to MSBA include interest that may exist in grade consolidation, reduction in transitions from one school to another, desired grade configuration within schools and maximum student population to be accommodated in each school. Notification as to whether the Town will be invited into the program is expected prior to the next deadline for submission of SOIs.


Dr. Glenn A. Brand
Superintendent of Schools


Jeffrey M. Hull
Town Manager



Wilmington, Massachusetts

INTER-DEPARTMENTAL COMMUNICATION

FROM THE TOWN MANAGER

February 5, 2021

TO: Board of Selectmen

RE: Notification Plans for Annual Town Meeting New Start Time and Location.

At the Selectmen's January 25, 2021 meeting approval was granted to conduct the 2021 Annual Town Meeting at the Shriners Auditorium. At present, the change in venue and time have been posted on the Town's website, on the Town's Facebook page and announced via Twitter. Notice of the change in meeting location and time has been provided to the *Wilmington Apple* for coverage. In the weeks leading up to Annual Town Meeting the following steps will be taken:

- Notice will be placed in April-June edition of *Town Topics*;
- Twitter posts will continue to be issued periodically leading up to Annual Town Meeting;
- Location and start time will be displayed on the Rotary signboard at Rotary Park, signboard at the Roman House and using the Town's two (2) electronic signboards;
- Postcards with the date, time and location of Annual Town Meeting will be mailed to residents;
- Everbridge notification system and the School Department notification system will be used within six weeks of Annual Town Meeting;
- Elderly Services, Library and Recreation email alerting systems will send information to subscribers;
- Front cover of the Recommendations of the Finance Committee and Planning Board, which is mailed to all residents prior to Annual Town Meeting, will include notice of the date, time and location;
- Automated Town phone directory will include brief announcement of date, time and location;
- WCTV will be utilized to inform residents.

These measures will be staggered in the coming weeks in an effort to use multiple avenues to inform residents of the change in time and location.


Jeffrey M. Hull
Town Manager



Wilmington, Massachusetts

INTER-DEPARTMENTAL COMMUNICATION

FROM THE TOWN MANAGER

February 5, 2021

TO: Board of Selectmen

RE: 2021 Annual Town Meeting – Warrant Articles by Petition

Please be advised that the following petitioned Warrant articles, of which copies are enclosed, were submitted by citizens for inclusion on the 2021 Annual Town Meeting Warrant.

<u>ARTICLE</u>	<u>PETITIONER</u>
Town-Owned Land Purchase Map 40, Parcels 100 and 101 – Morton Street	Brendan Finn
Authorization to Petition State Legislature to Allow Kristofer Stokes' Test Results from 2021 (and future results) be Allowed for any Employment Consideration as a Fire Fighter	Kristofer Stokes
Town-Owned Land Purchase Map 55, Parcel 228A – Lake Street	Michael & Hailey O'Connor
Name Soccer Field at North Intermediate School	Janet Engrem
Rezone from Residential 60 (R60) to Residential 20 (R20) Map R3, Parcel 15 – 417 Andover Street	David M. Romano
Town-Owned Land Purchase Behind 12 Ohio Street	Tanya & Carlos Miranda
Town-Owned Land Purchase Map 6, Parcels 149 and 150 – Stanley Street	Craig Newhouse
Town-Owned Land Purchase 848 Woburn Street	Philip Thomas Verre
Rezone from General Business (GB) to Neighborhood Mixed Use (NM) Map 40, Parcels 11 and 13 – Cross Street	Jonathan Main
Town-Owned Land Purchase Map 9, Parcel 56 – Aldrich Road	Michael Faulkingham
Rezone from Residential 60 (R60) to Highway Industrial (HI) Map R1, Parcel 2A; Map R2, Parcel 19A and Map 103, Parcels 24 and 24A	Michael J. Newhouse
Rezone from General Industrial (GI) to Highway Industrial (HI) Map R1, Parcel 1A	
Acquire by Gift Map R1, Parcel 1 – Route 125	Michael J. Newhouse

Amend Zoning By-Law

Section 3.5.8 of Table 1 of Principal Use Regulations

Margaret McKenna

Rezone from Residential (R-10) to Neighborhood Mixed Use (NM)

Map 66, Parcel 15 – 168 Middlesex Avenue

Margaret McKenna

Amend Zoning By-Law

Section 3.5.19 of Table 1 of Principal Use Regulations

Section 3.8.14

Michael J. Newhouse



Jeffrey M. Hull
Town Manager

JMH/bjd

Enclosure

cc: Mark Reich, Town Counsel



Wilmington, Massachusetts

INTER-DEPARTMENTAL COMMUNICATION

FROM THE TOWN MANAGER

February 5, 2021

TO: Board of Selectmen

RE: Department of Housing and Community Development Local
Rapid Recovery Grant

Under the direction of Chairman Michael Champoux, members of the Wilmington Economic Development Committee submitted an application to the Department of Housing and Economic Development's Massachusetts Downtown Initiatives department to assist local businesses with recovery from the economic downturn brought on by COVID-19. The Town was informed that a technical services grant has been awarded to the Town. A consultant will be assigned to the Town to assist with identifying the specific challenges that have led to business slowdown or vacancies. A set of actionable steps are expected to be developed to help businesses get back on their feet. A webinar will be scheduled in late February to begin discussions to assess local conditions and possible short to intermediate term actions to spur business. The project will continue for approximately five (5) months. The target area for this effort is the Main Street corridor.



Jeffrey M. Hull
Town Manager

cc: Kerry Colburn-Dion, Assistant Town Manager/Human Resources Director
Valerie Gingrich, Planning/Conservation Director
Michael Champoux, Chairman, Economic Development Committee



Wilmington, Massachusetts

INTER-DEPARTMENTAL COMMUNICATION

FROM THE TOWN MANAGER

February 5, 2021

TO: Board of Selectmen

RE: Update on Senior Center Building Project

P3, the Owners Project Manager (OPM) for the Senior Center feasibility and schematic design project, issued a Request for Qualifications (RFQ) on behalf of the Town to seek an architect/designer to work with the Town on first reaching consensus for a site best suited to the requirements for a senior center followed by developing the design for a center based upon feedback received. The deadline for submission of proposals was Thursday, February 4, 2021 at 2:00 p.m. Twelve proposals were received from interested firms. Each member of the Senior Center Building Committee will receive a full set of the proposals to review and evaluate. The OPM will guide the committee through the evaluation process and conduct the reference checks on behalf of the committee. The expectation is that a shortlist of designers will be identified for interviews similar to the process used to select the OPM. The committee will provide me with a recommendation on the firm to hire. George Hooper, Chairman of the Senior Center Building Committee will be working with P3 to establish a timeline to complete proposal reviews and to establish dates for interviews.


Jeffrey M. Hull
Town Manager

cc: Kerry Colburn-Dion, Assistant Town Manager/Human Resources/Director
George Hooper, Public Buildings Superintendent



**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

1000 Washington Street, Suite 600
Boston, MA 02118-6500
Telephone: (617) 305-3580
www.mass.gov/dtc

CHARLES D. BAKER
GOVERNOR

KARYN E. POLITO
LIEUTENANT GOVERNOR

MIKE KENNEALY
SECRETARY OF HOUSING AND
ECONOMIC DEVELOPMENT

EDWARD A. PALLESCHI
UNDERSECRETARY

KAREN CHARLES PETERSON
COMMISSIONER

February 3, 2021

Chairman Board of Selectmen
Town Hall
121 Glen Road
Wilmington MA 01887

Re: License Expiration Notice

Dear Chairman:

According to the Department of Telecommunications and Cable's (Department) records, your cable television license (license) with Verizon New England, Inc. will expire on 2/25/2022. As the Issuing Authority, you should have completed the ascertainment process of determining your community's cable-related needs and reviewing Verizon New England, Inc.'s performance under the current license. In order to provide sufficient time to review a company's formal renewal proposal, all ascertainment should be completed within six months of the date of this letter. Once ascertainment is complete, you should notify Verizon New England, Inc. and provide it with your results.

If you have not completed your ascertainment process, or anticipate difficulty in doing so within the next six months, the Department is available to assist you through the final stages of license renewal. Should you require assistance, please contact the Department at 617-305-3580 or dte.filing@mass.gov.

Sincerely,

Shonda D. Green
Department Secretary

RCVD TOWN MANAGER
'21 FEB 5 AM 11:51

From: Fraser, Alicia (DPH)
Sent: Tuesday, January 26, 2021 3:34 PM
To: Jeffrey Hull
Cc: Board of Health; Oliver, Robert W (DPH)
Subject: [EXTERNAL] RE: Update on Wilmington Childhood Cancer Study

Mr. Hull,

Thank you for reaching out--my apologies for the brief delay in responding to your email. Internal review of the study is progressing and I anticipate that I'll be able to reach out to you and other stakeholders within the next month to start scheduling private briefings of the study's results.

I will be in touch with your office, with the Wilmington Board of Health, and with the Community Advisory Committee as soon as the study is ready for release. Thank you for your continued patience. We are committed to releasing the study as soon as possible.

Sincerely,
Alicia Fraser

Alicia J Fraser, DSc
Director, Environmental Epidemiology Program
Bureau of Environmental Health
Massachusetts Department of Public Health
250 Washington St, 7th Floor
Boston, MA 02108
617-624-5757



260 Franklin Street
Suite 700
Boston, MA 02110
(857) 259-5200
(857) 259-5212 fax

Daniel R. Deutsch, Esq.
ddeutsch@bdboston.com

February 1, 2021

VIA ELECTRONIC FILING

Ms. Cynthia T. Brown
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

**RE: New England Transrail, LLC, D/B/A Wilmington & Woburn Terminal
Railway-Construction, Acquisition, and Operation Exemption-in
Wilmington and Woburn, Massachusetts
FD 34797 Sub-Docket 1
*Further Status Report of Town of Wilmington***

Dear Ms. Brown:

On behalf of the Town of Wilmington (“Wilmington”), we submit this further status report pursuant to the Board’s decision dated April 5, 2019 and amended October 24, 2019, requiring the parties to submit a status report by November 8, 2019 and every 90 days thereafter. This report follows our report of November 2, 2020.

Previous reports submitted by Wilmington and by NET and WWI summarize past discussions between Wilmington and WWI/GFI concerning a conceptual alternative to the project that is the subject of the above-noted proceeding. The pace and timing of WWI’s engineering and planning of a protentional alternative redevelopment project have depended upon both the development and approval of remedial options for clean-up of the Olin site by USEPA and Olin Corporation and also the decision-making of WWI and NET, matters which largely are beyond the control of Wilmington.

Nonetheless, Wilmington stands ready to resume consideration of any additional relevant information and submittals from WWI and NET when circumstances permit. As previously reported, USEPA circulated its Proposed Remedial Plans, held internet-based public presentation and comment sessions, and received written comments. Wilmington and its geotechnical consultants participated in those sessions and have submitted multiple written comments. In due course, USEPA is expected to develop a further, if not finalized, set of plans (aspects of which are by their nature interim measures, subject to further refinement and expansion over time), along with the agency’s responses to public and written comments and to issue its Record of Decision. (In the interim, there have been significant communications among USEPA, Olin and its consultants, and Wilmington consultants concerning Olin’s failure to maintain a temporary cap over the site’s sub-surface contaminant containment structure and the technical parameters for Olin to replace, monitor and maintain the cap going forward.)

{00027070 2-8804/23}



Ms. Cynthia T. Brown
February 1, 2021
Page 2

Wilmington stands ready to hear further from WWI/GFI about its redevelopment proposal once the remediation planning process has progressed sufficiently to make that realistic.

Please let us know if you require any additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D. Deutsch', with a long horizontal flourish extending to the right.

Daniel R. Deutsch

cc: Eric M. Hocky, Esq. (by email)
Danielle Gosselin, OEA (by email)
Adam Assenza, OEA (by email)
Jeffrey M. Hull, Town Manager, Town of Wilmington (by email)
Attached Service List

Ms. Cynthia T. Brown
February 1, 2021
Page 3

CERTIFICATE OF SERVICE

I, Daniel R. Deutsch, hereby certify that a copy of the foregoing Status Report on behalf of the Town of Wilmington dated February 1, 2021, was sent via first-class mail to the following parties of record.

Eric Hocky, Esq.
Clark Hill PLC
Two Commerce Square
2001 Market Street, Suite 2620
Philadelphia, PA 19103

William Walsh-Rogalski
(Mail Code ORA 17-1)
Office of Environmental Review
U.S. EPA Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Steven C. Armbrust
CSX Transportation, Inc.
500 Water Street, J150
Jacksonville, FL 32202

Kathleen M. Barry
Wilmington-Woburn Collaborative
14 Powder House Circle
Wilmington, MA 02210

Linda Raymond
Woburn Neighborhood Association, Inc.
10 North Maple Street
Woburn, MA 01801

James M. Cashwell
David M. Share
Olin Corporation
3855 North Ocoee Street, Suite 200
Cleveland, TN 37312

Martha K. Stevenson
Wilmington Environmental Restoration
Committee
7 Chandler Road
Wilmington, MA 01887

Laura Swain
Commonwealth of Massachusetts Department
of Environmental Protection
One Winter Street
Boston, MA 02108


Daniel R. Deutsch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

VIA ELECTRONIC MAIL

Date: See Signature Stamp Below

James M. Cashwell, Director
Environmental Remediation
Olin Corporation – Suite 200
3855 North Ocoee Street
Cleveland, TN 37312

**Re: Comments on the Design Plan, Containment Area Temporary Cap Replacement,
dated January 8, 2021
Olin Chemical Superfund Site, Wilmington, Massachusetts**

Dear Mr. Cashwell:

On January 8, 2021, Olin Corporation (Olin) submitted a document entitled *Design Plan, Containment Area Temporary Cap Replacement* (the “Design Plan”). The Design Plan was submitted in response to the United States Environmental Protection Agency’s (EPA) December 14, 2020 letter identifying issues pertaining to the Containment Area temporary cap (cap) maintenance, monitoring and reporting (the “EPA Letter”). The EPA Letter required Olin to submit a design plan for the replacement of the existing cap in place at the Olin Chemical Superfund Site (Site) pursuant to the July 3, 2007 *Remedial Investigation/Feasibility Study Administrative Settlement Agreement and Order on Consent* (AOC) for the Site, CERCLA Docket No. 01-2007-0102, and its accompanying *Statement of Work* (SOW).

Olin submitted the Design Plan to fulfill the information requirements of the EPA Letter. EPA has provided a copy of the Design Plan to the Town of Wilmington (the “Town”) and the Wilmington Environmental Restoration Committee (WERC) for review and comment. Upon reviewing the Design Plan and comments provided by the Town and WERC, EPA has determined that the Design Plan cannot be approved until additional information is provided. Attached to this letter are comments that Olin must address in a revised Design Plan. **Olin shall submit a revised Design Plan for EPA approval under the AOC by February 26, 2021 that incorporates and/or responds to the comments specified in Attachment A.**

Where comments cannot be resolved due to the inability to complete an updated field survey of the Containment Area due to snow accumulation on the existing cap, Olin shall provide conceptual details in the revised Design Plan based on historical documents. These conceptual

details shall be updated in the Detailed Construction Work Plan (DCWP) to be submitted to EPA for approval. Olin shall reference the historical documents used to develop the conceptual details in the revised Design Plan and state that the conceptual details will be updated in the DCWP after completion of the field survey.

Please do not hesitate to contact me at (617) 918-1720 or at fontaine.joshua@epa.gov should you have any questions regarding these comments. The EPA case team can be available to meet and discuss these comments with Olin prior to the February 26, 2021 deadline.

Sincerely,

JOSHUA FONTAINE

Digitally signed by JOSHUA

FONTAINE

Date: 2021.02.04 15:59:20 -05'00'

Josh Fontaine
Remedial Project Manager
Superfund and Emergency Management Division, Remediation Branch I
U.S. Environmental Protection Agency – Region 1

cc: Lynne Jennings, EPA
Melanie Morash, EPA
Kevin Pechulis, Esq., EPA
Lisa Funderburg, Esq., Olin
Libby Bowen, Olin
Chinny Esakkiperumal, Olin
John Rice, Wood
Garry Waldeck, MassDEP
Jeffrey Hull, Town of Wilmington
Martha Stevenson, WERC
Suzanne Sullivan, WERC
Gary Mercer, WERC
Elizabeth Harriman, WERC
Russ MacDonald, WERC
Stephanie Baima, WERC

Attachment A
EPA Comments on the Design Plan for Cap Replacement, dated January 8, 2021

The Design Plan for the Cap Replacement dated January 8, 2021 (the “Design Plan”) presents the general approach and replacement cap materials for achieving the requirements stated in EPA’s Letter sent to Olin on December 14, 2020 (the “EPA Letter”). This attachment addresses the areas in the Design Plan that require clarification and/or more details. Olin shall submit a revised Design Plan for EPA’s approval by February 26, 2021 incorporating and/or responding to the comments specified in this attachment.

EPA Comments on the Design Plan:

Section 2.0, Background:

1. The Design Plan does not describe the events that occurred in November 2020 including the breach of the existing temporary cap, the exposure of sections of the Containment Area, and the response actions to temporarily patch the existing cap while the new cap is designed and installed. Olin shall update this section to accurately describe the November 2020 cap breach and following response actions.

Section 3.1, Recommended Geomembrane Liner:

2. The Design Plan incorrectly states “The 24-mil WC liner exceeds the liner thickness of 20-mil recommendations made by USEPA...” On November 30, 2020, Olin submitted a Technical Memo to EPA (the “Tech Memo”) proposing the use of a 20-mil liner. The EPA Letter states that “EPA believes that a thicker (greater than 20 mil) and higher-density geomembrane may be warranted.” Olin shall update this reference in the Design Plan to accurately reference EPA’s request on using a geomembrane thicker than 20-mil.
3. Further information is needed to determine if the proposed 24-mil woven polyethylene geomembrane is appropriate for the proposed design at the Olin Superfund site which will be exposed to the harsh weather conditions in New England. Olin shall add an attachment to the Design Plan that provides examples of this geomembrane material being used at other sites and/or case studies where the 24-mil woven polyethylene geomembrane has been installed in an exposed state, ballasted, and monitored and maintained over a minimum of five years in similar climates comparable to the New England region. If no examples are available, Olin shall reconsider the use of a shallow soil cover to aid in securing and protecting the cap or Olin shall propose an alternative liner product, such as a geomembrane with an artificial grass cover.
4. The last sentence of Section 3.1 states “wildlife disturbance is not expected to damage the liner”. As written, the Design Plan does not currently provide sufficient evaluation or calculations of the ground pressure and impact load (e.g. a deer running across the cap) to make this statement. Section 4.3 mentions “If warranted in the future (e.g., evidence of wildlife damage is identified on the cap during schedule inspections), and approved by

USEPA, the remediation contractor will install a 10-foot high deer fence with access...” EPA prefers that the 10-foot deer fence be installed upon completion of the cap instead of waiting for damages from wildlife to be incurred. However, if Olin would rather not install a fence at this time, Olin shall demonstrate by providing additional puncture calculations to demonstrate wildlife, such as a deer running across the cap, will not cause punctures or tears to the proposed cap cover system.

Section 3.2, Soil Cover Considerations:

5. Generally, a woven polyethylene geomembrane liner is lighter than high density polyethylene (HDPE) liner. EPA is concerned that this woven material may be more susceptible to wind load and uplift. Olin shall revise the Design Plan to include calculations for the anchor trench and ballast to demonstrate that the proposed Design Plan will avoid wind pull-out and uplift.
6. Section 3.2 states “The perimeter of the liner will be secured by excavating an anchor trench as described in Technical Specification 31 20 00 – Earth Moving in Appendix D, and in Drawings C-101 and C-301”. Drawing C-301 includes details for anchoring the liner to existing concrete structures but does not specify which sections of the cap will be secured to existing structures or identify what existing structures will be used for anchoring. Furthermore, Drawing C-101 illustrates that the new cap will be installed over the existing retaining wall and into the detention pond located to the south of the Containment Area. EPA assumes Olin plans to anchor the cap to the side of the existing retaining wall. Olin shall revise the Design Plan (including applicable Technical Specifications and Drawings) to clarify the areas of the cap that will be anchored to existing concrete structures and identify which structures will be used for anchoring.

Section 4.0, Temporary Cap Construction:

7. Prior to initiating installation of the replacement cap, Olin shall submit their remediation contractor’s Detailed Construction Work Plan (DCWP) to describe in detail all phases of construction procedures, quality control, documentation, communication during implementation of the project, and revisions to any conceptual details (such as geomembrane elevations grades, slopes and stormwater runoff calculations). During construction, Olin shall submit daily reports to EPA summarizing the previous day’s construction activities, materials delivered, quality control testing performed, deficiency tracking logs, weather, etc. These daily reports shall include copies of the material data submittals, referenced in Section 4.3, and copies of contractor submittals, referenced in Technical Specification 01 33 00, as attachments. Olin shall state in Section 4.0 that the DCWP will be submitted to EPA for review and approval within 30 days of EPA’s approval of the revised Design Plan.

Section 4.1, Removal of Existing Polyethylene Liner:

8. Olin shall revise Section 4.1 to define a “heavy precipitation event” that would result in active work being suspended. In addition, Olin shall revise the Design Plan and Technical Specifications to include stop work action levels based off situations where either work is

being delayed due to precipitation and/or runoff (including snow melt). Olin shall not remove sections of the existing cap during a precipitation event of more than 0.5-inches of rain in a 24-hour period.

Section 4.2, Subgrade Preparation:

9. The first and second sentences of Section 4.2 are contradictory. The first sentence states, “The replacement temporary cap system will follow the existing grade” and the second sentence states the “remediation contractor will grade the surface to drain and prevent ponding”. In addition, Technical Specification Section 31 20 00 Part 3.2.A states “...to promote positive drainage”. These statements are too vague. The Design Plan needs more details concerning the intent of subgrade excavation and filling activities to demonstrate where runoff from the newly installed cap will flow. During a call with EPA on January 5, 2020, Olin presented a figure which depicted conceptual geomembrane elevation contours; however, these contours were not included on Drawing C-101. Olin shall revise the Design Plan (including applicable Drawings and Technical Specifications) to include, at a minimum, conceptual elevation grades, conceptual slopes, the intended runoff flow direction, and a list of any Site drainage features which will receive runoff (i.e. basins, ponds, drainage ditches, etc.). Olin shall update the conceptual grades and conceptual slopes in the DCWP with the data from the updated field survey of the Containment Area. Olin shall include an as-built drawing surveyed and generated by a land surveyor licensed in the State of Massachusetts in the construction completion report that demonstrates the grades and slopes have been achieved to shed water as proposed in the revised Design Plan and DCWP.
10. Even prior to the events of the November 2020 cap breach, the existing cap was ineffective at preventing leakage across its surface. Water management may become a serious problem after the installation of the new impervious cap since an increase in Containment Area runoff from precipitation and snow melt is expected. EPA is concerned that the increased runoff will have the potential to overload the existing Site drainage features. Olin shall make the following revisions to the Design Plan:
 - a. Add an appendix providing runoff calculations for the Containment Area. The runoff calculations can be initially based off conceptual geomembrane grades and conceptual slopes and revised in the DCWP once the updated field survey is completed.
 - b. Evaluate the existing Site drainage features and their capability for handling the increased volume of Containment Area runoff while meeting the current stormwater design standards. If the conceptual geomembrane grades and conceptual slopes are used in the revised Design Plan for the initial evaluation, Olin shall reevaluate if overload will occur after recalculating runoff volumes based off the revised geomembrane grades and slopes proposed in the DCWP.
 - c. If Olin determines that the increased runoff will overload the existing Site drainage features in either the revised Design Plan and/or DCWP, Olin shall propose methods

for controlling runoff while meeting the conditions of current stormwater design standards.

- d. Describe how the disturbed area surrounding the cap will be stabilized and protected from erosion. Olin shall add a Part to Technical Specification 31 20 00 to describe Site restoration practices.
11. Olin shall revise Section 4.2 to specify the type of equipment required for proof-rolling including the size and type of compaction equipment. In addition, Proof rolling may not be suitable due to the difficulty of maintaining consistent compaction and grading over the entire extent of the Containment Area. Olin shall clarify in the revised Design Plan (including applicable Drawings and Technical Specifications) the goals of proof rolling and provide alternative compaction methods in case proof rolling is ineffective to achieve the proposed proof rolling goals.
 12. Olin shall revise the Design Plan and Technical Specification 31 20 00 to define the compaction requirements for backfilling, compaction (e.g. a certain number of passes with a certain weighted proof roller), and acceptance of subgrade material. During compaction, if fill material is backfilled into depressions where the total amount of the fill material exceeds 12-inches thick, Olin shall compact the fill material in separate lifts that are compacted between intervals to minimize future settling.
 13. EPA disagrees with the statement “significant settlement is not anticipated due to the length of time the soils have been in place” since details pertaining to the historical consolidation and placement of soil materials in the Containment Area are seriously lacking and settling has been observed under the existing cap resulting in “trapolining” and pooling of storm water and snow melt. Differential settlement may continue to occur due to the significant loading and stress exerted on the Containment Area soil throughout construction of the new cap and future environmental investigations. Olin shall revise the Design Plan (including applicable Drawings and Technical Specifications) to address the following:
 - a. Remove the statement referenced above;
 - b. Clearly state the level to which minor settling is expected;
 - c. Define significant settling;
 - d. Establish corrective action criteria for significant settling (e.g. observations of “trapolining” and/or pooling of water); and
 - e. Provide the corrective action methods that will be implemented to resolve any significant settling.

Section 4.3, Geomembrane Liner Installation:

14. Olin shall revise the Design Plan to include the maximum allowable pressure on the proposed 24-mil woven polyethylene geomembrane. For example, most HDPE geomembrane liners have a maximum allowable pressure of 8 pounds per square inch (psi).
15. As illustrated on Drawing C-101, the new cap will extend into the location of the current gravel roadway. Section 4.3 mentions that the gravel roadway will be replaced along portions of the eastern and southern sides of the cap after installation is completed. No details regarding the construction of the replacement roadway are provided in the Design Plan. Although unclear, the provided information suggests that the replacement roadway will be installed over sections of the newly installed cap. Olin shall revise the Design Plan (including applicable Drawings and Technical Specifications) to provide the following additional details regarding the construction of the replacement roadway:
 - a. Revise Section 4.3 to clearly state that the replacement roadway will be constructed over sections of the newly installed cap.
 - b. Clarify how Olin intends to construct the roadway without overloading the cap.
 - c. Revise applicable Drawings to include the proposed grades and base width of the replacement roadway (specifically in the areas of the proposed access road over the cap). The slope of the roadway should promote drainage to prevent flooding of the roadway.
 - d. Define the allowable ground pressure/load for the proposed access road over the cap.
 - e. Add ground pressure calculations to confirm the load on the cap will not exceed manufacturer allowable standards (manufacturer allowable ground pressures are typically significantly less than the published puncture resistance values);
 - f. Clarify how Olin intends to restrict vehicular traffic on the newly installed cap. Although puncture calculations may indicate that vehicle traffic is not likely to damage (puncture) the cap, vehicular traffic will stress (possibly stretching) portions of the cap supporting the load. EPA believes vehicles should not be driven on the cover unless absolutely mandatory and approved by a Professional Engineer.
 - g. Provide details for the installation and seaming methods of the geotextiles used as a cushion layer under the new roadway but above the newly installed cap.
16. Section 4.3 states that the geomembrane panels will be overlapped and welded in accordance with Specification 31 35 26.16. Section 4.3 does not indicate how the geotextile cushion layer will be installed below the cap. Olin shall revise Section 4.3 to include details on the installation of the geotextile panels below the geomembrane in accordance with Technical Specification 31 05 19.13.

Section 4.4.2, Installer Quality Control:

17. Olin shall revise the Design Plan to state that QC testing results will be provided to EPA for review and approval within seven (7) days of any field test and/or receipt of the analytical results from the laboratories (including the third-party laboratory).

Section 6.1, Cap Integrity Testing:

18. Section 6.1 states “In addition to the visual inspection, seam integrity testing will be conducted by Air Lance Testing via ASTM D4437 during the annual inspection at one location per 500 liner feet of seams (approximately 6 locations).” Air Lance Testing should be performed on all seams annually. Destructive Testing (peel and shear) should be performed at one location per 500 linear feet of seam. The total number of annual samples cannot be determined until a figure is provided indicating the length, width, and placement of each panel. Olin shall remove “(approximately 6 locations)” in the revised Design Plan and leave the sampling frequency of “one sample per 500 linear feet of seams”. Olin shall establish in the DCWP the number of seam samples that will be collected for cap integrity sampling after reviewing the installation plans and placement of the geomembrane panels. In cases where any air lance testing fails the testing requirements, Olin shall conduct more intrusive destructive testing (such as peel and shear testing) on the areas where the failed sample was collected. If multiple locations fail the air testing, Olin shall evaluate whether replacement and re-seaming of the cap is warranted. In addition, EPA believes that additional in-situ vacuum testing of non-seam locations should be conducted at locations where visual evidence suggests the liner is stressed, stretched, or otherwise compromised. Olin shall conduct the in-situ vacuum testing on stretched and stressed (compromised) areas annually. Areas that fail vacuum testing shall be repaired using a patch, extrusion welding, and vacuum testing in accordance with the specifications.

Figures:

19. Olin shall revise Figure 2 and applicable drawings to accurately depict the location of the West Ditch Stream culvert corridor that carries the West Ditch Stream along the eastern side of the Containment Area.

Appendix A, Design Drawings:

Drawing C-101:

20. Olin shall revise Drawing C-101 to include the approximate locations of the sand ballasts and relocate the filter socks to be upgradient and not in the wetland areas.
21. Olin shall update the Notes Section on Drawing C-101 to include note(s) on the Design Plan stating all work will be performed in accordance with the technical specifications of the materials.

Drawing C-301:

22. There appears to be a discrepancy between Drawing C-101 and Drawing C-301 relating to the distance the new cap will extend over the bentonite slurry wall towards the anchor trench. The Anchor Trench Detail on Drawing C-301 proposes a length of approximately 5 feet from the bottom of the geomembrane in the anchor trench to the center point of the bentonite slurry wall while Drawing C-101 illustrates the distance to be greater than 5-feet. Olin shall revise Drawings C-101 and C-301 to accurately depict the distance of the new cap will extend over the bentonite slurry wall towards the anchor trench. In addition, Olin shall clarify in the Design Plan on how they intend avoid disturbing the soft soil/bentonite mixture of the slurry wall structure during cap installation.
23. Olin shall revise the "Anchor Trench Detail" to specify the anchor trench's minimum allowable radius as determined by the manufacturer.
24. Olin shall revise Drawing C-301 to include a typical detail depicting seaming/overlapping of 16-ounce non-woven geotextile and an additional detail illustrating the seaming/welding of the 24-mil woven polyethylene geomembrane liner.

Appendix B, Manufacturers Specifications:

25. Olin shall add the manufacturer installation requirements/specifications and any material warranty information for the proposed 24-mil woven polyethylene geomembrane liner and 16-ounce non-woven geotextile cushion layer to Appendix B of the revised Design Plan. Olin shall clarify in Section 3.2 that the proposed uses of the geomembrane liner and geotextile cushion layer will not void the manufacturer warranty.

Appendix C, Geomembrane Liner Puncture Calculations:

26. Olin shall revise the Design Plan to define the acronym "GM" in Appendix C.
27. Olin shall revise the calculations in Appendix C to clearly identify the A_p/A_c value used in the calculations. Based on the math, these calculations appear to use the A_p/A_c value for Crushed Rock (0.40).
28. There appears to be a discrepancy with the title of Scenario No. 1 and the following notes. The title suggests that 12 inches of cover will be used. In the notes, however, Olin assumes 6 inches of protective cover above the geomembrane. Olin shall either correct the title or the notes of Scenario No. 1 to correct this discrepancy. Olin shall update any corresponding calculations accordingly.
29. Since upcoming environmental investigations will likely be conducted using a track mounted drill rig or equivalent, Olin shall add puncture calculations for the use of a track-mount drill rig to Appendix C.

Appendix D, Technical Specifications:

Section 31 05 19.13:

30. The information in the Design Plan should match the Technical Specifications including defining the proposed materials and the method of installation. Olin shall revise all Technical Specifications to ensure they reference the material specifications of the 24-mil woven polyethylene geomembrane liner and the 16-ounce non-woven cushion geotextile.

Section 31 35 26.16:

31. Olin shall revise Part 3.2.B to provide information to describe how the anchor trench will be adequately drained to prevent ponding of water and softening of adjacent soils. If this would be best illustrated with a drawing, Olin may develop a drawing to fulfill this comment's response. Note that the backfilling and compaction of the anchor trench shall be completed in accordance with Technical Specification Section 31 20 00 "Earth Moving". Prior to backfilling, the temporary sandbags or other suitable materials shall be removed from the anchor trench.
32. Olin shall revise the Design Plan (including applicable Drawings and Technical specifications) to provide the temperature range and temperature limitations to define when the geomembrane is in its most contracted (taut) state.