

## NMI - Aug / Sept meeting notes and emails

EMAIL Recap of the Aug 22<sup>nd</sup> Meeting

**Ed Burt <eburt.hd@gmail.com>**

Aug 23, 2022,  
8:07 PM

to Christopher, Bruce, garry, Diana, twatson@hopedale-ma.gov, Hopedale, Kara

Hi Chris,

Below are notes from yesterday's conversation. Please edit, correct, add to, .. if anything is misstated or missed. And a few questions, comments regarding the Transportation plan.

Thank you all for your time and attention. We very much appreciate your understanding and help in addressing our questions/concerns.

Thanks again,

Ed

Transportation Plan comments/questions:

Please add Hopedale to the Community Disturbance and Spill Contingency sections, and highlight that GURR's Hopedale Railyard is within a Zone II Water Protected area.

As such, for the Hopedale Contingency area, can the emergency notification be an hour (instead of 24 hours) to ensure that the water supply aspects are addressed as quickly as possible?

(Or have the actual trucking route go north/west, excluding Hopedale altogether. If the train route is from Hopedale back north through Grafton and then along the CSX lines, why not truck the material directly to one of those railyards rather than to Hopedale? That would seem to be a far more direct trucking route from Concord. Sorry – had to ask..)

Regarding section 3.4.1 –

### **3.4.1 Grafton and Upton Railroad (G&U RR)**

The Grafton and Upton Railroad will be providing the first leg of rail transportation from the G&U RR in Hopedale, MA to North Grafton, MA where the G&U will interchange with the CSX Railroad (CSXT) for further transport.

The primary contact for operations at the G&U Distribution Center located in Hopedale, MA, will be Jean Michael Mongui. Mr. Mongui's primary office number is 508-473-9600.

His backup number (mobile) is 617-741-7774, with an email address of [jmongui@graftonuptonrr.com](mailto:jmongui@graftonuptonrr.com).

Two notes/questions –

The ‘interchange’ with CSX Railroad does not involve reloading the material, that’s just the train cars switching to another line for transport, right?

The G&U contact, Jean Michael is one of the principles for 2MResources, a recycling company that leases the warehouse at the Hopedale railyard from GURR. At least he was, didn’t realize he is a GURR employee or that the recycling operation maybe involved. Not sure that has any relevance, but thought I’d mention it.

8/22/2022

Meeting Notes:

Attendees: See email list

Timeframe: Although GURR has never mentioned this to the Town, this transport has been planned out for years. Not expecting to start any of the Hopedale transport until next summer. (Which is good because the rt 16 area of the Hopedale railyard is currently under construction.)

Expect six 20-Ton Trucks to cycle between Concord and Hopedale for a total of 12 to 18 routes per day, over a 4 year period. Increase in street trucking should be negligible. Increase to the railyard trucking is unknown.

Materials: 87,000 cubic yards of contaminated soils; not to the level to be classified as ‘hazardous materials’, sealed in bags, placed in the trucks; Rail car holds 9 bags; Is headed to a landfill in Michigan.

Transport contract is thru US Ecology. GURR is a subcontractor.

Transportation bid did not include any site specific conditions.

Hopedale concerns/comments:

GURR has not communicated any of this to the Town. Currently the Town has no insight to the railyards operations, site conditions, storm water management, etc. Especially concerning is the FlyAsh transloading services that operates with no oversight or emergency procedures and how this transport service may increase the risk to the fly-ash silos.

Per GURR’s past practice, we can expect that they will not allow any oversight, or establish systematic emergency procedures unless directed to by a federal level agency.

GURR’s Hopedale railyard is within a Zone II Water Restricted area, with the Mill River running along the side of the railyard.

Most of the concerns related to this transport focus on the “what if’s, the accidents” and the associated contingencies. Again, any systematic preventive measures will have to be requested/required by the EPA.

Post meeting note – there is an existing sewer line easement between the elderly housing and rail tracks in the railyard. Need to ensure that any site work does not impact that easement.

**Sept 8 th Follow-up:**

**Smith, Christopher <Smith.Christopher@epa.gov>**

Sep 8, 2022,  
9:10 AM

to Bruce, Kara, garry, me, Diana, twatson@hopedale-ma.gov

Hi Ed,

Sorry, I have been out of the office the last couple of weeks. See responses in red below.

Also, a separate note that Bruce and his team visited the Site this past week. They are confident that the setup they have will allow for safe transloading of the bagged waste from trucks to train. The train cars are not anticipated to stay on the site for an extended period of time, they should be moving relatively quickly. Bruce, feel free to add any details.

Thanks

Chris

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**From:** Ed Burt <[eburt.hd@gmail.com](mailto:eburt.hd@gmail.com)>  
**Sent:** Wednesday, September 7, 2022 10:41 PM  
**To:** Smith, Christopher <[Smith.Christopher@epa.gov](mailto:Smith.Christopher@epa.gov)>; Diana Schindler <[DSchindler@hopedale-ma.gov](mailto:DSchindler@hopedale-ma.gov)>; [twatson@hopedale-ma.gov](mailto:twatson@hopedale-ma.gov)  
**Subject:** Re: Discuss NMI Waste Shipment Through G&U Railroad

Hi Chris,

Any updates, info, ..confirmation that the notes are OK, Transportation plan will be updated, anything to report from the site visit, .. ?

We have a Water & Sewer Commission meeting tomorrow night and are due to report back.

thanks,

Ed

On Tue, Aug 23, 2022 at 8:07 PM Ed Burt <[eburt.hd@gmail.com](mailto:eburt.hd@gmail.com)> wrote:

Hi Chris,

Below are notes from yesterday's conversation. Please edit, correct, add to, .. if anything is misstated or missed. And a few questions, comments regarding the Transportation plan.

Thank you all for your time and attention. We very much appreciate your understanding and help in addressing our questions/concerns.

Thanks again,

Ed

Transportation Plan comments/questions:

Please add Hopedale to the Community Disturbance and Spill Contingency sections, and highlight that GURR's Hopedale Railyard is within a Zone II Water Protected area.

We can do this.

As such, for the Hopedale Contingency area, can the emergency notification be an hour (instead of 24 hours) to ensure that the water supply aspects are addressed as quickly as possible?

At the very least we can change language to "ideally within an hour, no later than 24 hours" I'll talk to Bruce

(Or have the actual trucking route go north/west, excluding Hopedale altogether. If the train route is from Hopedale back north through Grafton and then along the CSX lines, why not truck the material directly to one of those railyards rather than to Hopedale? That would seem to be a far more direct trucking route from Concord. Sorry – had to ask..)

I don't think any of this will change. But as discussed the additional truck traffic should not really be noticeable with amount of traffic already going through the area.

Regarding section 3.4.1 –

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Two notes/questions –

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Yes

The G&U contact, Jean Michael is one of the principles for 2MResources, a recycling company that leases the warehouse at the Hopedale railyard from GURR. At least he was, didn't realize he is a GURR employee or that the recycling operation maybe involved. Not sure that has any relevance, but thought I'd mention it.

We'll make sure this is ok.

8/22/2022

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Transport contract is thru US Ecology. GURR is a subcontractor.

Transportation bid did not include any site specific conditions. –

- Not sure what this final line means, but otherwise the summary looks good.

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Ed

**Ed Burt** <eburt.hd@gmail.com>

Sep 8, 2022,  
10:53 AM

to Christopher, Diana, twatson@hopedale-ma.gov, Bruce, Kara, garry

Got it - Thank you Chris.

Couple quick follow-ups -

We understand the increase to street truck traffic should be negligible.

Our concern is the increase of truck traffic at the entrance and within the site railyard itself. We have no information on how that volume changes to understand an impact at the entrance and especially within the site if it may impact any risks associated with the fly-ash silos.

The Route 16 area near the railyard is currently under construction. There may be questions/issues related to the RR's plan, which Diana will follow-up on.

Here's the background/explanation regarding the "Transportation bid did not include any site specific conditions" statement --

As discussed, because the railyard is within a Zone II Water protect area, we are expecting that emergency procedures and overall site conditions properly reflect the water protection aspects. The RR contends that local jurisdiction doesn't apply (ie no permitting, approvals, oversight,..), which makes it very difficult to perform our water protection oversight responsibilities. The thought was that if any conditions were part of the bid requirements, then they should have been easy to enforce.

That's why we were curious if there were any conditions related to the bid process. The response in the meeting was that the Transportation bid did not include any specific conditions.

Thanks again,

Ed