

NMI Status / Communications Dec 9, 2022 to Jan 6, 2023

## Summary

Dec 20, 2022 NMI held a conference call with Hopedale Town Admin (Jeff Nutting, who invited Water Department Tim Watson and David Butler). Meeting recap is provided in a separate document.

Dec 22, 2022 NMI forwarded the Spill Report, which initiated subsequent questions, emails.

## Recap:

- USEcology authored the NMI Superfund Site Transportation and Disposal Plan.
- USEcology authored the "AFTER ACTION SPILL REPORT", and is the responsible party for the clean-up.
- USEcology has directed all questions to Bruce Thompson of de maximis, inc, NMI's project coordinator and general contractor.
- USEI is performing as required by their agreement with de maximis, and de maximis understanding with EPA and MassDEP regarding this project.

## EPA project manager –

- During our call with Jeff Nutting, Tim Watson, and David Bulter last week we answered all the questions they had regarding soil transport, containment (lined and sealed rail cars), ground barriers (currently poly sheeting, and a possible concrete pad installation in the spring), and oversight (USEI is on-site for every transport).
- As for an update on the soil bags, the last two weeks (12/19/22 – 12/30/22) USEI transferred 54 bags of soil (1,122 tons total), had tears in 10 bags (19%) during the truck to rail transfer, but no spills of soil outside of the gondola. Overall the bag tear rate and spill rate have both decreased since the start of off-site soil transport. USEI and de maximis are working with the bag manufacturers to further improve the bag design.

## Emails:

**Ed Burt** <[eburt.hd@gmail.com](mailto:eburt.hd@gmail.com)>

Dec 9, 2022,  
11:28 AM

to Kara, Bruce, garry, [twatson@hopedale-ma.gov](mailto:twatson@hopedale-ma.gov), Sarah, Zanetta, BOH, Hopedale, Glenda

Hi Kara,

A 40% bag split rate has certainly heightened the concerns. We encourage you to seek alternate transportation, keeping this material out of Hopedale's Zone II until every bag, every transport can be assured to be safe within a water protected area.

To clarify the regulation question. It is our understanding that GURR does not have a Multi-sector General Permit, does not have exposure certifications for the Hopedale railyard and does not have a local Special Permit for this material within Hopedale's Zone II. The permitting/authority question is specific to this material at GURR's Hopedale railyard. Please provide the information that supports this material within the Zone II located railyard.

Also, please provide the contact information for US Ecology, so we may contact them directly.

Thank you

Ed

**Nierenberg, Kara**

Thu, Dec 22,  
2022, 3:02 PM

to jnutting@hopedale-ma.gov, Matthew, me, Bruce, garry, twatson@hopedale-ma.gov, Sarah, Zanetta, BOH, Hopedale, G

Hi Ed,

As promised, I've attached the Spill Report regarding the release of NMI soils during transload from truck to rail on November 17, 2022. The US Ecology emergency response crew responded to the spills on 11/17/22 and 11/18/22. GURR responded to the spills on 11/21/22 and on 11/22/22 plastic sheeting was placed on the back side of the gondola railcars to catch any unintended spillage during transload activities.

Happy Holidays,

**Kara Kelly Nierenberg, PE**

Massachusetts Superfund

617-918-1435

Email to Joe Weismann, USEcology

**Town of Hopedale - NMI project**

Inbox



**Ed Burt** <[eburt.hd@gmail.com](mailto:eburt.hd@gmail.com)>

Thu, Dec 29, 2022,  
1:24 PM (8 days ago)

to Joe.Weismann

Hi Joe,

I'm one of Hopedale's Water & Sewer Commissioners. I called your office earlier today - they told me you were out, will be back next week.

When you do return, please give me a call, or let me know what a good time would be for us to connect. I'd like to discuss the Nuclear Metals soils, specifically while at Grafton Upton's Hopedale railyard.

The W&S Commission, and the community, have some questions/concerns regarding permits (or lack of them actually), the transportation plan and spill report. Especially in relation to the railyards Zone II water protected district location.

Thank you and Happy New Year,  
Ed Burt

Hopedale Water & Sewer Commission  
508 259 1181 (c)

**Joe Weismann**

Jan 3, 2023, 10:09  
AM (3 days ago)

to Bruce, me

Hello Mr. Burt. All inquiries regarding the Nuclear Metals project, including activities at the Grafton & Upton Railyard, should be directed to Mr. Bruce Thompson of de maximis, Inc. I believe you already have Mr. Thompson's contact information.

Best regards,

**Joe Weismann, CHP**

**Director, Radiological Programs**

101 S. Capitol Blvd., Suite 1000

Boise, ID 83702

e [Joe.Weismann@usecology.com](mailto:Joe.Weismann@usecology.com)

o 208.319.1634

c 845.551.7602

Emergency Response: 800.839.3975

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

Tue, Jan 3, 12:56  
PM (3 days ago)

to Joe, Bruce

Hi Joe,

Thank you for the quick response. Yes, I do have Bruce's contact info and will follow-up with him and Kara Nierenberg.

As I relay this to the other Commissioners and Hopedale officials, if I have missed or misstated anything with the quick recap below, please let me know.

Feel free to contact me directly at any time should anything change.

Thanks,

Ed

Email exchange recap with USEcology's Joseph Weismann:

- USEcology authored the NMI Superfund Site Transportation and Disposal Plan.
- USEcology authored the "AFTER ACTION SPILL REPORT", and is the responsible party for the clean-up.
- USEcology has directed all questions to Bruce Thompson of de maximis, inc, NMI's project coordinator and general contractor.

**Bruce Thompson**

Tue, Jan 3, 2:27  
PM (3 days ago)

to Kara, Garry, me, Joe

- Ed – you can add that USEI is performing as required by their agreement with de maximis, and our understanding with EPA and MassDEP regarding this project.

Bruce Thompson  
*de maximis, inc.*

200 Day Hill Road, Suite 200  
Windsor, CT 06095

860 298 0541 main  
860 662 0526 cell  
[brucet@demaximis.com](mailto:brucet@demaximis.com)

**Ed Burt** <[eburt.hd@gmail.com](mailto:eburt.hd@gmail.com)>

Tue, Jan 3, 5:06  
PM (3 days ago)

to Bruce, Joe, Kara, Garry

Hi Bruce,

Ok - I never meant to imply otherwise.

However, the T&D plan still has errors, a number of questions remain unanswered and the responses we have received over the past 2 months have generated other concerns/questions.

As put by a resident just today - This Superfund cleanup must be a multi-million-dollar effort, why skimp and possibly create a second contaminated site (Hopedale)? No enclosures, no ground barriers, no oversight. Why is Hopedale bearing all the risk, especially when that risk is to the public water supply?

We'll regroup at our next meeting, which is Thursday evening the 12th. If you have any further information that I can relay at that meeting, please let me know.

Thanks,

Ed

**Nierenberg, Kara**

Wed, Jan 4, 7:35  
AM (2 days ago)

to Bruce, Joe, garry, Zanetta, me

Hi Ed,

During our call with Jeff Nutting, Tim Watson, and David Bulter last week we answered all the questions they had regarding soil transport, containment (lined and sealed rail cars), ground barriers (currently poly sheeting, and a possible concrete pad installation in the spring), and oversight (USEI is on-site for every transport).

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Happy New Year,

**Kara Kelly Nierenberg, PE**

Massachusetts Superfund

617-918-1435

**Ed Burt** <[eburt.hd@gmail.com](mailto:eburt.hd@gmail.com)>

Jan 4, 2023, 8:46  
AM (2 days ago)

to Kara, Bruce, Joe, garry, Zanetta

Thanks Kara,

We did receive an update from that meeting, but there are still many outstanding questions, concerns.

For example, just using your note -- "a possible concrete pad" continues to raise the red flag related to this open/out door process and the lack of ground protection. In the past, and with no guarantee of ground barriers for the future.

And the USEI oversight is for transport, but who is providing the oversight while the material sits, and accumulates, within the Zonell area, waiting for the railcars to leave the railyard?

I'll include the information from your note for next week's meeting.

The decrease in bag splits and lack of spills is good news.

If anything else comes up, or should be included for our meeting, just pass it along, or give me a call.

Thanks,

Ed