



April 15, 2011

Secretary Richard K. Sullivan, Jr.  
Executive Office of Energy and Environmental Affairs (EEA)  
Attn: MEPA Office  
Bill Gage, EEA No. 14722  
100 Cambridge Street, Suite 900  
Boston MA 02114

Re: Rock Chapel Marine, EEA 14722

Dear Secretary Sullivan,

The Mystic River Watershed Association (MyRWA) is a grassroots organization dedicated to the protection and restoration of the Mystic River, its tributaries, and related natural resources throughout the watershed's 22 communities. MyRWA is submitting this comment letter on behalf of a diverse constituency of residents who live in the area of Chelsea Creek in Chelsea, East Boston and Revere. MyRWA is concerned about the adverse impact of the proposed project on the water quality of Chelsea Creek and the impact on local living conditions. This comment letter will provide detail on why the submitted ENF is deficient in descriptions of the potential impacts of the project and mitigation strategies. We respectfully request that the Executive Office of Energy and Environmental Affairs require that an Environmental Impact Report (EIR) be submitted by Rock Chapel Marine/Eastern Minerals to provide greater information on the potential impacts of demolition, construction and ongoing operations at the facility.

The proponents of the project have submitted an ENF that does not adequately address potential impacts of the project on the local environment. This comment letter will specifically mention the "short ENF" that was published in the Environmental Monitor and the "full ENF" that was provided by the proponent but not mentioned in the Environmental Monitor.

The proponent describes the expansion of operations from 33 Marginal St. to 99 Marginal St. that would allow greater storage, activity and distribution of road salt but also allow receipt of other types of cargo including cobblestones and shipping material. The completion of this project as described will entail the destruction of existing oil tanks on site, construction of garage buildings, an increase in the amount of salt stored on site, additional truck activity, additional boat-based delivery and potentially new types of materials stored at the site.

Air Quality: The short ENF does not mention any impact on air quality beyond the reduction of queuing times of trucks. The short ENF fails to mention the impact of demolition, construction, and operations on overall air quality. The inclusion of this material is a minimum requirement of the ENF form when the instructions explicitly state: *"The project should summarize both the project's direct and indirect impacts (including construction period impacts) in terms of their magnitude, geographic extent, duration and frequency, and reversibility, as applicable."*

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It is clear that the short ENF does not mention key information on “construction period impacts” and we have been told by other sources that the larger ENF package does not describe how particulate matter created during demolition and construction phases will be mitigated. Demolition of materials and construction is also likely to liberate materials from the soil in the area of the tanks. Past release of petroleum products at this site require an evaluation of the level of contamination and how they will be controlled during demolition, construction and operations. Finally, is the proponent saying in the ENF that they will store more material but not have additional distribution of materials through additional truck trips? What is the impact on air quality of additional truck trips and barge delivery of materials? In summary:

- 1) Does the full ENF adequately describe the impact of debris created during demolition?
- 2) Has the proponent informed the MEPA analyst of the level of soil contamination at site and how efforts will be made to control materials during all phases of project?
- 3) Will the proponent have additional truck traffic associated with the additional materials stored on site?
- 4) What are the levels of emissions expected from a large ship that docks at the site with diesel engine running during extended period of unloading.

Water quality: The proponent is storing additional material along the edge of a water body, albeit a Designated Port Area that is clearly impaired by bacteria and contaminants. The existing impairment of Chelsea Creek does not lower the threshold for efforts to protect water quality. Additional documentation is required to describe the potential for materials stored at the site to enter the creek from the site. During a rain event, does runoff from the site increase salinity in the area of the facility? What potential impacts do the anti-caking agents contained within the salt material have for the environment (water column and sediments)? The proponent is seeking permission to receive, store and distribute additional materials at the site. How will the storage and stormwater system be designed to handle additional materials without providing delimiting language on what materials will be received, stored and distributed from site. Will any of the future materials contain metals, particulate fine material that could be released into the water?

Finally, the ENF published in the Environmental Monitor failed to provide notice that separate ENF documents were available to the public with additional information. The four-page ENF did not mention any potential direct or indirect impacts of the project on the environment that would make the public aware that they had an interest in the case. The short ENF submitted needs to alert people that the demolition, construction and operations could potentially impact the environment they live in. The full ENF needs to document in detail the answer to basic questions about levels of soil contamination, air and water quality and mitigation strategies. We do not believe that the submitted ENF, both the short ENF and full ENF provide sufficient detail to address key questions on potential impacts to the environment, public health and mitigation efforts.

EkOngKar Singh Khalsa,  
Executive Director

