

ADS ENVIRONMENTAL ENGINEERING, LLC

June 7, 2010
File No. 0128

Kevin S. Eriksen, Esq.
Deschenes & Farrell, P.C.
One Billerica Road
Chelmsford, MA 01824
Phone: (978) 250-8877
Fax: (978) 250-0057

Attention: Mr. Kevin Eriksen, Esq.

RE: Environmental Consulting Services
SBA Tower Siting
Lawsbrook Road/WR Grace Site
Acton, MA

Dear Mr. Eriksen:

ADS Environmental Engineering, LLC (ADS) has prepared this summary letter to present concerns and important considerations regarding developing structures on the W.R. Grace Superfund site in Acton, Massachusetts. We understand that the area south of Fort Pond Brook is being considered for the siting of a new cell tower compound.

ADS has conducted a cursory review of current conditions at the site where 1,1-dichloroethene (1,1-DCE) is reportedly the primary and most widespread contaminant of concern. Other contaminants and hazardous degradation by-products of 1,1-DCE also exist in the subsurface. 1,1-DCE is found at concentrations of up to 550 ug/L (ppb) in the vicinity of the proposed new cell tower location. The EPA considers 7 ppb to be the level that can be considered "safe". The Massachusetts Department of Environmental Protection (DEP) has promulgated Method 1 Risk Based Standards for this compound at 7 ppb for water within a productive or potentially productive aquifer, and at 80 ppb for concentrations in groundwater near occupied structures. A primary concern with chlorinated solvents including 1,1-DCE is that they will volatilize from the groundwater and into the air space in the soils above, and can migrate into indoor spaces, causing an inhalation exposure. The concentrations at the site are well above levels that are considered safe for indoor air exposures.

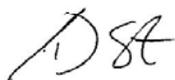
Additional concerns regarding developing this site include: exposure of site workers, trespassers and abutters during construction/excavation; management of hazardous soil and groundwater during construction; the need for properly trained personnel to conduct the site work; proper disposal of excess soils that are generated that are hazardous waste and require transportation paperwork signed by the owners or operators of the site; approvals for the tower installation by EPA; and, possible loss of services due to future cleanup operations that may need to occur at the site. These concerns and some others are discussed below.

1. Cell tower installations often include enclosed structures or “shelters” where equipment is stored and employees visit to work on the equipment, sometimes for an extended period of time. Volatile contaminants, like 1,1-DCE, can accumulate within these structures, and result in exposure to these hazardous chemicals. Communication company employees are not trained to manage such environmental exposures, and therefore should not be subject to contaminated air conditions. There are liability issues associated with working on hazardous waste sites.
2. During construction, if excavation occurs within contaminated areas, affected soil and groundwater may need to be properly managed to avoid unintentional spreading of contamination, unauthorized off site transport of the contaminated media, and exposures to site workers and trespassers. Contractors that specialize in the installation of cell tower structures, including installation of underground foundations, piping, and other underground appurtenances are most often not trained to manage contaminated soil and groundwater.
3. Groundwater contaminant plumes are dynamic, and concentrations of contaminants and locations of affected groundwater can change based on seasonal and climatic changes. Actively pumping wells (Chistofferson, Scribner, Lawsbrook, e.g.), whether for environmental cleanup or for municipal water supply, can also affect groundwater flow directions, drawing contamination to where it didn't previously exist.
4. Contaminated media (soil and groundwater) would need to be stored and disposed of at a premium, since it is classified as hazardous.
5. Often, on hazardous waste sites, excavation in new areas can reveal additional contamination (from historic dumping, e.g.) that was not previously identified and would then need to be addressed. This would cause delays in construction, and possibly make this site infeasible after significant expenditures to permit the location, find a tenant, etc.
6. Any future excavation for repair/replacement of equipment, will require evaluation and planning to mitigate exposure to workers, and may require the filing of reports with the EPA and maybe DEP. This results in significant delays in restoring service, and added costs in work plans, and environmental professionals to plan and oversee the work.
7. Permits and approvals for the siting of the cell tower on a Superfund site would be required by EPA, who is overseeing the cleanup activities at the site. Obtaining these approvals can be difficult.
8. In the future, if environmental cleanup plans need to be modified or changed at the W. R. Grace site, the location of the cell tower and appurtenant structures could obstruct future cleanup actions. Conversely, cleanup activities at the Superfund site may, in the future, disrupt the use or functioning of the cell tower. Cell tower installations are very costly; any risk of interruption will not be tolerated by the tenants, and may not be acceptable to many companies.
9. Finally, there is a stigma to operating on a hazardous waste Superfund site. Future tenants may not want to enter into a lease for a tower at that location, or they may be leery of sending their employees to work at such release sites, particularly those as visible as the W. R. Grace site. Again, there could be concerns about liability, and the marketability of the location may be affected.

Please feel free to contact me to discuss these issues further.

Sincerely,

ADS ENVIRONMENTAL ENGINEERING, LLC

A handwritten signature in black ink, appearing to read 'DSt'.

Andrea D. Stiller, LSP
Principal