

From: [Bill White](#)
To: [Dierker, Carl](#); [Lederer, Dave](#); [Catri, Cindy](#); [Williams, Ann](#); [Colarusso, Phil](#)
Cc: [Alicia Barton](#); [Jay Borkland \(jborkland@apexcos.com\)](#); [Chet Myers \(cm Myers@apexcos.com\)](#); [Christopher Morris](#); [Christen Anton](#); [Eric Hines \(ehines@lemessurier.com\)](#); [Davis, Gary \(DCR\) \(gary.davis@state.ma.us\)](#)
Subject: Revised Request for Addition of Blasting to Final Determination
Date: Monday, May 20, 2013 3:51:17 PM
Attachments: [image004.jpg](#)
[Request for Addition of Blasting to Final Determination Final .pdf](#)

Carl, Dave, Cindy, Ann, & Phil,

We have updated our May 1, 2013 draft blasting letter with an eye to your suggested clarifications that you forwarded to our attention on May 8, 2013. For clarity, we have addressed your questions/concerns in the following manner:

1. Clarify that the state will employ bubble curtains as well as silt curtains.

Response: MassCEC has included the use of silt curtains and bubble curtains within its specifications. The revised letter has been updated to restate this on page 14.

2. Clarify the timing options for pre-blasting. Blasting in the November 15-January 15 timeframe is preferable from a fisheries standpoint. The draft letter states that "The project cannot afford to have the Contractor wait until November to commence pre-blasting, as this delay in the sequencing would have the effect of delaying the start of the installation of the sheet pile wall by several months." On the other hand, the draft letter also states that "...blasting prior to the removal of overburden, or "pre-blasting", would likely occur in the late fall, *within an approximately one month window beginning no sooner than September 15th and ending no later than January 15th.*" (emphasis added). It would appear that pre-blasting may well occur after November 15. In addition, under the post-dredge "last resort" blasting scenario, non-blasting rock removal would not occur until January and any necessary blasting would not occur until spring, yet the draft letter does not indicate that this would present a timing problem for placement of the sheet pile wall.

Response: EPA's clarification is noted, and MassCEC has revised its letter to indicate that the proposed blasting will fall within an approximately one month window beginning no sooner than September 15 on page 8. Additional information is also provided on page 8 regarding the potential impacts associated with sheet pile wall installation as a consequence of the blasting schedule.

3. Identify the three locations where blasting is now anticipated.

Response: The plan drawing on page 4 has been updated to show the anticipated locations in red.

4. Identify state ARARs that are triggered by blasting (and additional dredging) or clarify which prior ARARs analysis provided by the Commonwealth included an analysis of how blasting

(and additional dredging) meets the substantive requirements of all applicable or relevant and appropriate state requirements.

Response: MassCEC's review of the June 18, 2012 ARARs letter from the Commonwealth (included within Appendix D of the Final Determination) indicates that the Commonwealth considered blasting impacts when preparing its ARARs letter. The revised letter has been updated to restate this on page 14.

The revised letter is attached and the attachments are on Apex's Document Management System. To access the Document Management System, please insert the following login address into your browser, and then use the login and (very special) password outlined below.



Our hope is to finalize a path forward by June 1, 2013 so that the contractor can plan accordingly. Please let us know if these changes address your concerns/questions.

Many thanks for your continued partnership.

Bill

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