

From: Marsh, Michael
To: [Christopher Morris](#)
Subject: FW: Comments on revised Blasting Specifications - New Bedford Marine Commerce Terminal
Date: Monday, September 30, 2013 6:33:00 PM

Chris – Sorry, I'd intended to cc you on this email , but accidentally omitted your email address...

Mike

From: Marsh, Michael
Sent: Monday, September 30, 2013 6:11 PM
To: Chet Myers; Jay Borkland
Cc: 'JMcAllister@apexcos.com'; Carl Dierker; Cynthia Catri; Ann Williams; Elainet Stanley; Kimberly Tisa; Jackie Leclair; Lombardo, Ginny; Phil Colarusso
Subject: Comments on revised Blasting Specifications - New Bedford Marine Commerce Terminal

Chet and Jay - EPA has reviewed the draft Blasting Specifications that we received from you on Wednesday September 25, 2103, and has the following comments:

1. In discussing potential impacts to the Hurricane Barrier in Section 3.11, the Specifications describe a two part test for determining the allowable charge weight per delay. The blasting contractor is to use the lower charge weight as determined by: (1) the Owner's site specific field test results of scaled distance versus peak particle velocity; or, (2) the value determined from the table presented in Section 3.11. While the Specifications note that if the Owner's blasting criteria is lower than the table value, it must be used, the Specifications establish no upper limit on the Owner's blasting criteria. Furthermore, over half of the charge weight values presented in the table exceed the 150 pound limit established to protect aquatic resources, as demonstrated by the revised JASCO acoustical modeling study.

To be consistent with the Second Modification of the Final Determination requirements established to protect against environmental impacts (outlined at Specification Section 3.9.2), Section 3.11 of the blasting Specifications, which describes the methodology for determining the charge weight, should include the additional requirement that AT NO TIME SHALL THE CHARGE WEIGHT PER DELAY EXCEED 150 POUNDS - regardless of the results of the Owner's site specific seismic testing or the values presented in the Table in Section 3.11. The current language of this section of the Specifications could be misinterpreted to allow charge weights per delay as high as 200 pounds.

2. It is our understanding that a minimum of 2.0 feet of stemming length is to be used when blasting. This requirement does not appear to be reflected in the Specifications [see Section 3.9.2.1.5]. Please clarify the Specifications to include 2.0 foot minimum stemming length.

3. The Specifications should require that bubble curtains must be activated (i.e., not merely “properly functioning”) during all blasting events, including blasting occurring after November 15. Bubble curtains are required not only to deter fish, but are an important mitigative measure to reduce the pressure effects of blasting in the water column. The Specifications should reflect the requirements of the Second Modification of the Final Determination (Section VII.B.1, Blasting Condition 5; also, see Specifications Sections 3.9.2.1.10; 3.9.2.1.11; and 3.9.4.25).
4. Specifications regarding the fish startle system seem repetitive [see Specifications Sections 3.9.2.1.15 and 3.9.2.1.18]
5. Vague “excessive mortalities (hundreds of fish/event)” language is included in the Specifications [see Specifications Section 3.9.2.1.16]. EPA will provide appropriate language for inclusion in the Final Blasting Plan and Specifications in our comments on the revised draft Blasting Plan and Specifications to be submitted by CEC in the near future (see below).
6. Section 3.10.15 of the Specifications, regarding drill logs, mentions providing information on maximum weight of explosives detonated within any 8 millisecond period. The Blasting Specifications should consistently reflect the requirement of a minimum 25 millisecond delay for all blasting.
7. The revised Blasting Plan and Specifications must reflect the requirements and conditions of the Second Modification of the Final Determination, in addition to the requirements specified in the six EPA letters referenced in Specifications Section 3.9.2.1.19.

EPA expects to issue the Second Modification of the Final Determination later today. The Commonwealth must provide to EPA a revised draft Blasting Plan, including revised Specifications, reflecting the terms and conditions of the Second Modification of the Final Determination, and addressing the comments contained in this email and in the email from Carl Dierker to Bill White, dated September 6, 2013 (5:37 PM). EPA will review and provide comments on the revised draft Blasting Plan and Specifications, as soon as possible after it is submitted.

Please note that EPA’s review and comment on the revised draft Blasting Plan and Specifications may be delayed in the event of a federal government shutdown.

If you have questions or need further information, please contact me by email or at

617.918.1556, or Cindy Catri by email or at 617.918.1888. Again, please note that, in the event of a federal government shutdown, EPA employees will not be checking emails, answering phone calls, checking messages or doing any official EPA business until the shutdown has ended and EPA resumes normal operations.

Mike

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