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M E M O R A N D U M

TO:	Users of the Sudbury-Hudson Transmission Project Soil and Groundwater Management Plan (SGMP)
FROM:	Paul McKinlay, PG, LSP
DATE:	May 4, 2022
SUBJECT:	Incorporation of Supplemental Soil & Groundwater Sampling Analysis and Results Sudbury to Hudson Electrical Transmission Project

Since the preparation of the January 2022 Soil & Groundwater Management Plan (SGMP) to support the Sudbury to Hudson Electrical Transmission Project (the Project), additional soil and groundwater data were obtained which identified oil and/or hazardous material (OHM) primarily within the railroad right-of-way (ROW) portion of the Project located in Sudbury, MA. The additional sampling identified arsenic in surficial soil indicative of historical use of the ROW as an active rail corridor. The presence of arsenic is deemed exempt from reporting pursuant to the Massachusetts Contingency Plan (MCP) 310 CMR 40.0317. Contractors working along this ROW should review these data to determine contractor health and safety. The supplemental data was documented in a letter report to the Town of Sudbury Earth Removal Board (ERB) dated March 14, 2022 (The ERB Report) which is attached to this memorandum and will be added to the SGMP document. As requested by the ERB on April 26, 2022, this memorandum directs the user to relevant sections of the January 2022 SGMP that addresses the management of OHM documented in The ERB Report.

Referenced below are relevant sections of the January 2022 SGMP which may be affected by recent data documented in The ERB Report with a brief discussion of any additional considerations:

Section 2.3.2 Soil Sampling & Analysis

Section 2.3.2.3 Sudbury MBTA ROW Results

The supplemental sampling documented in the ERB Report targeted known or suspected areas where OHM may be present. The supplemental sampling also included surficial arsenic soil sampling on the MBTA ROW in Sudbury, MA. This section of the SGMP discusses potential impacts in the Sudbury MBTA ROW portion of the Project which was further evaluated by the ERB sampling which identified elevated arsenic concentrations.

Section 2.3.3 Groundwater Sampling & Analysis
Section 2.3.3.2 Sudbury ROW
As part of the ERB sampling, four (4) additional monitoring wells were installed and sampled which did not identify OHM above applicable regulatory standards.

Section 3.0 Soil Management
Section 3.1 On-Site Soil Reuse
As listed in Section 3.1 on pages 3-1 and 3-2 of the SGMP, the soil management approach is derived from the Project design and the relevant guidance titled: Massachusetts Department of Environmental Protection (MassDEP) *Best Management Practices for Controlling Exposure to Soil During the Development of Rail Trails*. The best management procedures from MassDEP's guidance which are included in the SGMP are still valid, however, the arsenic results documented in The ERB Report should be utilized by the contractor when developing a site-specific health and safety plan referenced in this section of the SGMP.

The analytical results documented in The ERB Report do not alter the proposed soil management and re-use approach included in the SGMP. It should also be noted that the data does not affect the final Project design which will be completed as a rail trail which incorporates capping elements that will limit exposure to residual OHM present in the ROW portion of the Project.

Section 3.0 Soil Management
Section 3.2 Off-Site Soil Management
The data included in the ERB Report must be considered when identifying the appropriate off-Site facility to receive excess soils from the Project. For example, soil containing arsenic concentrations greater than 40 mg/kg would be classified as a "Type D" soil and may require an out-of-state facility.

Section 3.0 Soil Management
Section 3.3.4 Transportation and Disposal
The ERB Report identified Type D Soil which will require a Bill of Lading (BOL).

Section 4.0 Groundwater Management
The analytical data included in The ERB Report did not identify elevated concentrations of OHM at the four additional locations targeted for groundwater sampling; as such, procedures for managing groundwater included in the SGMP are not affected by the additional ERB data.

Figure 2 - Depicts Soil Types which will be modified to reflect Type D soils as a result of The ERB Report.

No additional sections of the SGMP are affected by the OHM identified in The ERB Report.