This memorandum responds to a request by staff of the Boston Conservation Commission (the "Commission") for additional information regarding the Notice of Intent for the 51 Melcher Street NOI (DEP File No. 006-1889 and BOS 2022-044), which was originally submitted on July 20, 2022. This memo includes an assessment of the use of a deployable flood barrier to protect the exterior transformer and the switchgear and an evaluation of the possible use of screening instead of bollards to protect the transformer. In addition, an Operations and Maintenance Plan including a Spill Prevention and Response Plan for the loading dock, as well as information pertaining to the diesel tank associated with the generator, is attached. Responses to the Commission’s information requests are described below.

1. **The Commission requested the inclusion of a deployable flood barrier to protect the transformer and the switchgear, or the use of a similarly protective measure. Chair Parker specifically asked about consideration of screening instead of bollards.**

   Bala Consulting Engineers, Inc. (Bala) corresponded with Eversource regarding the resiliency of their transformers to flooding on July 13, 2022. As indicated in this correspondence, Eversource did not recommend the use of flood shields due to the fact that their transformers are semi-submersible and can withstand submersion in flood waters without being damaged. Bala asked about the possibility of installing submersible switches and Eversource responded that they do not have submersible switches for the 13.8KV distribution system. Instead, Eversource’s practice is to replace damaged switches within one to two days following a large flooding event.

   Eversource was also asked for the maximum permissible elevation at which an equipment pad can be placed. Eversource responded transformers and switch pads may be placed at a maximum of 12 inches above the surrounding. As such, the proposed transformer and switch will be raised to this maximum height for increased flood resiliency. Bala also asked Eversource about the risk of impact from floating debris to the transformers and whether bollards would provide ample protection from such debris in a flood event. Eversource responded that the pad transformers are sturdy and are not anticipated to be adversely impacted by floating debris.

   Since the proposed transformer and switch are owned and operated by Eversource, the Proponent must abide by Eversource’s policies and requirements. The Proponent is working to maintain resilience to flooding while remaining in compliance with Eversource standards by raising the pad to the maximum height allowable.

2. **Commissioner Sullivan requested to see the spill prevention and response plan for the loading dock and was specifically concerned about potential spills from the diesel tank. He also asked how large the diesel tank is.**
Attached to this memo is an Operations and Maintenance Plan containing a Spill Prevention and Response Plan and the sub-tank cut sheet for the diesel generator.

The diesel generator has a dual tank mounted below the generator. The containment tank's double layer construction protects against fuel leaks and ruptures. The inner tank is sealed inside the outer tank. The outer tank contains the fuel in the event that the inner tank leaks or ruptures. This design is anticipated to protect resource areas from fuel leaks.
**C4.4 and C7.1 Sub-base Fuel Tanks**

Diesel Generator Set

80 – 200 kW 60 Hz

---

**Features**

- UL Listed for United States (UL 142) and Canada (CAN/ULC S601)
- Facilitate compliance with NFPA 30 code, NFPA 37 and 110 standards and CSA C282 code and B139-09 standard
- Welded, heavy steel gauge construction with a containment basin sized as a minimum 110% of the tank
- Gloss black polyester triglycidyl isocyanurate (TGIC) powder coating
- Dedicated external customer interface area with access to the 4” (101.6 mm) fuel fill, visual level gauge, normal and emergency vents
- Rear electrical stub-up area with removable access panel
- Removable engine supply and return dip tubes
- Two additional 1” (25.4 mm) ports for customer use
- Tanks are rated to safely support the weight of the generator
- 8 gal (30.3 L) drip pan for oil and coolant (for generator sets up to 60 ekW only)
- Standard NPT tank fittings
- UL listed emergency vents sized as per UL standards 3” (76.2 mm), 4” (101.6 mm), and 5” (127 mm) NPT
- Normal atmospheric vent 1-1/4” (31.75 mm)
- Top-mounted fuel level sensor with control panel alarms
- Top-mounted leak detection switch
- Lockable fuel fill cap, 4” (101.6 mm) NPT

---

**Description**

- Dual wall, secondary containment
- Pressure tested to UL requirements
- Fuel tank mounts directly below generator skid base
- Modular tank design is compatible with all factory units open and enclosed

**Options**

- Emergency vent and normal vent extension kits 12’ (3.66 m)
- 5 gal (18.9 L) spill containment
- Overfill prevention valve
- Tank riser to allow for visual secondary containment leak inspection
- Drop tube

---

*Image shown may not reflect actual configuration*
## C4.4, and C7.1 Sub-base Fuel Tank Dimensions and Capacities

<table>
<thead>
<tr>
<th></th>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>C4.4</td>
<td>FSBTC24</td>
<td>80</td>
<td>100</td>
<td>30</td>
<td>209</td>
<td>3</td>
<td>793</td>
<td>135.7</td>
<td>3447</td>
<td>485</td>
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<tr>
<td></td>
<td>FSBTD48</td>
<td>80</td>
<td>100</td>
<td>58</td>
<td>394</td>
<td>4</td>
<td>1492</td>
<td>1382</td>
<td>387</td>
<td>4835</td>
</tr>
<tr>
<td>C7.1</td>
<td>FSBTI24</td>
<td>125</td>
<td>150</td>
<td>40</td>
<td>402</td>
<td>4</td>
<td>1520</td>
<td>158.9</td>
<td>4035</td>
<td>647</td>
</tr>
<tr>
<td></td>
<td></td>
<td>175</td>
<td>200</td>
<td>35</td>
<td>395</td>
<td>4</td>
<td>1495</td>
<td>158.9</td>
<td>395</td>
<td>4835</td>
</tr>
<tr>
<td></td>
<td></td>
<td>68</td>
<td>57</td>
<td>29</td>
<td>2918</td>
<td>5</td>
<td>2940</td>
<td>198.2</td>
<td>771</td>
<td>5035</td>
</tr>
</tbody>
</table>

Tanks are UL Listed and constructed in accordance with UL Standard for Safety UL 142, Steel Aboveground Tanks for Flammable and Combustible Liquids and Canada CAN/ULC S601, Standard for Shop Fabricated Steel Aboveground Horizontal Tanks for Flammable and Combustible Liquids.

Fuel tanks facilitate compliance with the following United States NFPA Code and Standards:
- NFPA 30: Flammable and Combustible Liquids Code
- NFPA 37: Standard for the Installation and Use of Stationary Combustion Engines and Gas Turbines
- NFPA 110: Standard for Emergency and Standby Power Systems

Fuel tanks facilitate compliance with the following Canadian Standard and Code:
- CSA B139-09 – Installation Code for Oil-Burning Equipment

---

**Note:** For reference only – do not use for installation design. Please contact your local dealer for exact dimensions.
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Project Information

Site
51 Melcher Street
Boston, MA 02210

Developer
GI ETS Fort Point I LLC
c/o GI Partners
188 The Embarcadero, Suite 700
San Francisco, CA 94105

Site Supervisor
Wise Construction
21 East Street
Winchester, MA
781.721.1100

Site Contact
Name: TBD
Telephone: TBD
Cell phone: TBD
Email: TBD
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Section A: Source Control
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A Source Control

A comprehensive source control program will be implemented at 51 Melcher Street, which includes the following components:

› Regular pavement sweeping in the public way (standard asphalt section)
› Catch basin cleaning
› Clearing litter from the loading dock areas
› Enclosure and regular maintenance of all dumpsters
› Spill Prevention training
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Section B: Spill Prevention
B Spill Prevention

Spill prevention equipment and training will be provided by the property management company.

B.1 Initial Notification

In the event of a spill the facility and/or construction manager or supervisor will be notified immediately.

| Facility Manager (name):       | TBD |
| Facility Manager (phone):      | TBD |
| Construction Manager (name):   | TBD |
| Construction Manager (phone):  | TBD |

The supervisor will first contact the Fire Department and then notify the Police Department, the Public Health Commission and the Conservation Commission. The Fire Department is ultimately responsible for matters of public health and safety and should be notified immediately.

B.2 Further Notification

Based on the assessment from the Fire Chief, additional notification to a cleanup contractor may be made. The MA Department of Environmental Protection (DEP) and the EPA may be notified depending upon the nature and severity of the spill. The Fire Chief will be responsible for determining the level of cleanup and notification required. The attached list of emergency phone numbers shall be posted in the main construction/facility office and readily accessible to all employees. A hazardous waste spill report shall be completed as necessary using the attached form.
# Emergency Notification Phone Numbers

<table>
<thead>
<tr>
<th>1. FACILITY MANAGER</th>
<th>Name: TBD</th>
<th>Phone:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Beeper/Cell:</td>
<td>Home Phone:</td>
</tr>
<tr>
<td>Alternate Contact:</td>
<td>Phone:</td>
<td>Beeper/Cell:</td>
</tr>
</tbody>
</table>

| 2. FIRE & POLICE DEPARTMENT | Emergency: 911 |

| 3. CLEANUP CONTRACTOR | Address: TBD | Phone: |

| 4. MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION (DEP) | Emergency: (888) 304-1133 |

| 5. NATIONAL RESPONSE CENTER | Phone: (800) 424-8802 | Emergency: (800) 424-8802 |
| Alternate: U.S. Environmental Protection Agency | Business: |

| 6. BOSTON PUBLIC HEALTH COMMISSION | Phone: (617) 534-5393 | Phone: |
| Municipal Conservation Commission: | | |


Hazardous Waste & Oil Spill Report

Date: ___________________________ Time: ___________________________ AM / PM

Exact location
(Transformer #):

Type of equipment: ________________ Make: __________ Size: ______

S / N: ___________________________ Weather Conditions: ___________________________

On or near water?  □ Yes  □ No  If yes, name of body of water: ___________________________

Type of chemical / oil spilled: ___________________________

Amount of chemical / oil spilled: ___________________________

Cause of spill: ___________________________

Measures taken to contain or clean up spill: ___________________________

Amount of chemical / oil recovered: ___________________________ Method: ___________________________

Material collected as a result of cleanup:

_______ drums containing ___________________________

_______ drums containing ___________________________

_______ drums containing ___________________________

Location and method of debris disposal: ___________________________

Name and address of any person, firm, or corporation suffering charges:

Procedures, method, and precautions instituted to prevent a similar occurrence from recurring:

Spill reported by General Office by: ___________________________ Time: ___________________________ AM / PM

Spill reported to DEP / National Response Center by:

DEP Date: ________________ Time: __________ AM / PM  Inspector: __________

NRC Date: ________________ Time: __________ AM / PM  Inspector: __________

Additional comments: ___________________________
B.3 **Assessment – Initial Containment**

The supervisor or manager will assess the incident and initiate containment control measures with the appropriate spill containment equipment included in the spill kit kept on-site. A list of recommended spill equipment to be kept on site is included on the following page.

**Fire / Police Department:** 911

**Boston Public Health Commission**  (617) 534-5395

**Boston Conservation Commission:**  (617) 635-3850

### Emergency Response Equipment

The following equipment and materials shall be maintained at all times and stored in a secure area for long-term emergency response need.

<table>
<thead>
<tr>
<th>Supplies</th>
<th>Quantity</th>
<th>Recommended Suppliers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sorbent Pillows/&quot;Pigs&quot;</td>
<td>2</td>
<td><a href="http://www.newpig.com">http://www.newpig.com</a> Item # KIT276 — mobile container with two pigs</td>
</tr>
<tr>
<td>Sorbent Boom/Sock</td>
<td>25 feet</td>
<td><a href="http://www.forestry-suppliers.com">http://www.forestry-suppliers.com</a></td>
</tr>
<tr>
<td>Sorbent Pads</td>
<td>50</td>
<td></td>
</tr>
<tr>
<td>Lite-Dri® Absorbent</td>
<td>5 pounds</td>
<td></td>
</tr>
<tr>
<td>Shovel</td>
<td>1</td>
<td>Item # 33934 — Shovel (or equivalent)</td>
</tr>
<tr>
<td>Pry Bar</td>
<td>1</td>
<td>Item # 43210 — Manhole cover pick (or equivalent)</td>
</tr>
<tr>
<td>Goggles</td>
<td>1 pair</td>
<td>Item # 23334 — Goggles (or equivalent)</td>
</tr>
<tr>
<td>Gloves – Heavy</td>
<td>1 pair</td>
<td>Item # 90926 — Gloves (or equivalent)</td>
</tr>
</tbody>
</table>
Section C: Snow Management
C  Snow Management

› Snow storage areas will be managed to prevent blockage of storm drain catch basins and stormwater drainage swales. Snow combined with sand and debris may block a storm drainage system, diminishing the infiltration capacity of the system and causing localized flooding.

› Sand and debris deposited on vegetated or paved areas shall be cleared from the site and properly disposed of at the end of the snow season, no later than May 15.

› Snow shall not be dumped into any waterbody, pond, or wetland resource area.
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Section D: Maintenance of Stormwater Management Systems
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D  Maintenance of Stormwater Management Systems

D.1  Pavement Systems

D.1.1  Standard Asphalt Pavement

› Sweep or vacuum standard asphalt pavement areas at least four times per year with a rotary brush sweeper, vacuum or regenerative air sweeper and properly dispose of removed material.
› Recommended sweeping schedule:
  › Oct/Nov
  › Feb/Mar
  › Apr/May
  › Aug/Sep
› More frequent sweeping of paved surfaces will result in less accumulation in catch basins, less cleaning of subsurface structures, and less disposal costs.
› Check loading docks and dumpster areas frequently for spillage and/or pavement staining and clean as necessary.

D.2  Structural Stormwater Management Devices

D.2.1  Catch Basins

The proper removal of sediments and associated pollutants and trash occurs only when catch basin inlets and sumps are cleaned out regularly. The more frequent the cleaning, the less likely sediments will be re-suspended and subsequently discharged. In addition, frequent cleaning also results in more volume available for future deposition and enhances the overall performance. As noted in the pavement Operation and Maintenance (O&M) section, more frequent sweeping of paved surfaces will result in less accumulation in catch basins, less cleaning of subsurface structures, and less disposal costs.
There is one existing (1) catch basin at 51 Melcher. Disposal of all sediments must be in accordance with applicable local, state, and federal guidelines. A map of the catch basin locations is included in Section E.5 Maintenance Checklists and Device Location Maps.

**Inspections and Cleaning**

- All catch basins shall be inspected at least four times per year and cleaned a minimum of at least once per year.
- Sediment (if more than six inches deep) and/or floatable pollutants shall be pumped from the basin and disposed of at an approved offsite facility in accordance with all applicable regulations.
- Any structural damage or other indication of malfunction will be reported to the site manager and repaired as necessary.
- During colder periods, the catch basin grates must be kept free of snow and ice.
- During warmer periods, the catch basin grates must be kept free of leaves, litter, sand, and debris.

**D.2.2 Subsurface Infiltration Basins**

The subsurface infiltration/detention basins are used to detain and infiltrate rooftop runoff. There is one subsurface infiltration basin at 51 Melcher. A map of the infiltration basin locations is included in Section E.5 Maintenance Checklists and Device Location Maps.

**Inspections and Cleaning**

- The subsurface infiltration systems will be inspected at least once each year by removing the manhole/access port covers and determining the thickness of sediment that has accumulated in the sediment removal row.
- If sediment is more than six inches deep, it must be suspended via flushing with clean water and removed using a vactor truck.
- Manufacturer's specifications and instructions for cleaning the sediment removal row are provided as an attachment to this section.
- Emergency overflow pipes will be examined at least once each year and verified that no blockage has occurred.
- System will be observed after rainfalls to see if it is properly draining.

**D.2.3 Roof Drain Leader**

Roof runoff from building and canopy at 51 Melcher are directed to the subsurface infiltration unit.

- Perform routine roof inspections quarterly.
- Keep roofs clean and free of debris.
- Keep roof drainage systems clear.
› Keep roof access limited to authorized personnel.
› Clean inlets twice per year or as necessary.
Section E: Operations and Maintenance Plan
Summary
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E Operations and Maintenance Plan Summary

This Operation and Maintenance Plan has been prepared in accordance with the Stormwater Management Policy developed by the DEP, CZM and Boston DPW regulations as applicable. It specifies operational practices and drainage system maintenance requirements for the 51 Melcher Core Upgrade. Requirements should be adjusted by the site manager as necessary to ensure successful functioning of system components.

E.1 Routine Maintenance Checklists

Routine required maintenance is described in Sections A – D. The following checklists are to be used by the property manager to implement and document the required maintenance and inspection tasks.

E.2 Reporting and Documentation

The site supervisor shall be responsible for ensuring that the scheduled tasks as described in this plan are appropriately completed and recorded in the Maintenance Log. Accurate records of all inspections, routine maintenance and repairs shall be documented and these records shall be available for inspection by members of the Boston Conservation Commission or other designated body, or their designated agent, upon request.

The Maintenance Log shall:

› Document the completion of required maintenance tasks.
› Identify the person responsible for the completion of tasks.
› Identify any outstanding problems, malfunctions or inconsistencies identified during the course of routine maintenance.
› Document specific repairs or replacements.
## E.3 Construction Practices Maintenance/ Evaluation Checklist

### 51 Melcher – Boston, MA

<table>
<thead>
<tr>
<th>Best Management Practice</th>
<th>Inspection Frequency</th>
<th>Date Inspected</th>
<th>Inspector Initials</th>
<th>Minimum Maintenance and Key Items to Check</th>
<th>Cleaning or Repair Needed (Yes/No)</th>
<th>Date of Cleaning or Repair</th>
<th>Performed by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hay Bales/ Silt Fencing</td>
<td>Weekly and after any rainfall</td>
<td></td>
<td></td>
<td>Sediment build up, broken bales or stakes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Catch Basin Protection</td>
<td>Weekly and after any rainfall</td>
<td></td>
<td></td>
<td>Clogged or sediment build-up at surface or in basin</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Stormwater Control Manager: __________________________
### E.4 Long-term Maintenance/Evaluation Checklist

**51 Melcher – Boston, MA**

<table>
<thead>
<tr>
<th>Best Management Practice</th>
<th>Minimum Maintenance and Key Items to Check</th>
<th>Inspection Frequency</th>
<th>Date Inspected</th>
<th>Inspector Initials</th>
<th>Cleaning Frequency</th>
<th>Cleaning or Repair Needed</th>
<th>Date of Cleaning or Repair</th>
<th>Performed by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street Sweeping</td>
<td>Vacuum sweeper</td>
<td>4X per year</td>
<td></td>
<td></td>
<td>4X per year*</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deep Sump and Hooded</td>
<td>Remove sediment 1X per year or if &gt;6</td>
<td>1X per year</td>
<td></td>
<td></td>
<td>1X per year or</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Catch basins</td>
<td>inches</td>
<td></td>
<td></td>
<td></td>
<td>as necessary</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Subsurface Infiltration</td>
<td>Remove sediment 1X per year or if &gt;6</td>
<td>1X per year</td>
<td></td>
<td></td>
<td>1X per year</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Basins</td>
<td>inches</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roof Drains</td>
<td>Remove debris, clean inlets draining</td>
<td>4x per year</td>
<td></td>
<td></td>
<td>2x per year</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>to subsurface bed</td>
<td>roof inspection</td>
<td></td>
<td></td>
<td>inlet cleaning,</td>
<td></td>
<td></td>
<td></td>
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<td>roof debris as</td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td>necessary</td>
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<td></td>
</tr>
</tbody>
</table>

* Recommend sweeping Oct/Nov, Feb/Mar, Apr/May Jul/Aug with late winter most important

Stormwater Control Manager: ________________________________
E.5 Maintenance Checklists and Device Location Maps

These checklists are provided for the maintenance crew to photocopy and use when conducting inspections and cleaning activities to the stormwater management systems.
Maintenance Checklists
### Catchbasins – Inspect 4 times per year, clean when sediment depth > 6 inches or at least once per year.

<table>
<thead>
<tr>
<th>Catch Basin</th>
<th>Inspected (Y/N)</th>
<th>Sediment Depth (inches)</th>
<th>Cleaning needed (Y/N)</th>
<th>Date Cleaned</th>
<th>Comments (Trash, Oil, Pet waste, Lawn Debris, Damage)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CB 1</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td></td>
</tr>
</tbody>
</table>

### Infiltration/Detention Basins – Inspect once per year, remove sediment if more than 6 inches has accumulated in sediment forebay or sediment collection row.

<table>
<thead>
<tr>
<th>Basin</th>
<th>Inspected (Y/N)</th>
<th>Sediment Depth (inches)</th>
<th>Cleaning needed (Y/N)</th>
<th>Date Cleaned</th>
<th>Comments (Trash, Oil, Pet waste, Lawn Debris, Damage)</th>
</tr>
</thead>
<tbody>
<tr>
<td>IB 1</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td></td>
</tr>
</tbody>
</table>

### Roof Runoff Downspouts – Inspect roof drains monthly, clean inlets draining to the subsurface bed twice per year.

<table>
<thead>
<tr>
<th>Bldg #</th>
<th>Inspected (Y/N)</th>
<th>Sediment Depth (inches)</th>
<th>Cleaning needed (Y/N)</th>
<th>Date Cleaned</th>
<th>Comments (Trash, Oil, Pet waste, Lawn Debris, Damage)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bldg 1</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td></td>
</tr>
<tr>
<td>Canopy 1</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td></td>
</tr>
</tbody>
</table>
Device Location Maps
This page intentionally left blank.
Melcher Street (Public - 60' Wide)

Necco Court (Private - 25' Wide)

51 MELCHER STREET
EXISTING BUILDING TO REMAIN

51 MELCHER STREET
EXISTING BUILDING TO REMAIN

AREA = 13,927 SQ. FT.

BMP Location Exhibit
51 Melcher Street
Boston Massachusetts

Legend

<table>
<thead>
<tr>
<th>BMP TYPE</th>
<th>BMP ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Catch Basin</td>
<td>CB 1</td>
</tr>
<tr>
<td>Subsurface Infiltration</td>
<td>SIB 1</td>
</tr>
<tr>
<td>Roof Drain</td>
<td>RD 1</td>
</tr>
</tbody>
</table>

Figure 1
BMP Location Exhibit
51 Melcher Street
Boston Massachusetts
August 2022