



MEMORANDUM

TO: Select Board, Park & Recreation Commission, Board of Health, School Committee, Finance Committee, and Community Preservation Committee

FROM: Katie King, Assistant Town Manager/Director of Operations; Carys Lustig, Director of Public Works; Timothy McDonald, Director of Health and Human Services; Stacey Mulroy, Director of Park & Recreation

CC: Kate Fitzpatrick, Town Manager; David Davison, Assistant Town Manager/Director of Finance; Dan Gutekanst, Superintendent of Schools; Christopher Heep, Town Counsel

RE: Claxton Field Update

DATE: February 8, 2023

Board and Committee Members:

The Town is hosting a meeting on Wednesday, February 15 at 5:30 pm in Town Hall (Powers Hall) and via Zoom to update you and members of the public about upcoming soil testing at Claxton Field. This memo is aimed to provide foundational information in advance of that meeting.

Background

Claxton Field at 1380 Central Avenue includes two softball fields with an overlapping multi-purpose field, trail access, picnic tables, restrooms, and a parking lot. It had a playground area, which was recently removed. This site served as a burn dump prior to the development of the Recycling and Transfer Station in the 1950s/1960s. Claxton was redeveloped as a recreational facility approximately 60 years ago, when additional soil fill was brought to the site and leveled to create the existing fields.

For many years, the Park & Recreation Department and Department of Public Works (DPW) have identified Claxton Field as a priority for renovation within the Town's annual capital budget process, to upgrade the fields and amenities for Needham residents. There has been strong support from user groups, particularly from the softball community who have limited other field options in town. In 2019, the Park & Recreation Commission submitted a request for design funds to the Community Preservation Committee, which were approved at the October 2020 Town Meeting.

The Town engaged Weston & Sampson (W&S) to provide design, engineering, and environmental services for the renovation project. In December 2021, W&S conducted initial soil borings at Claxton for visual inspection to inform the design. This excerpt summarizes the boring results, which are consistent with the historical use of the site and its conversion to a field:

“The geotechnical engineer observed the subsurface materials to be fairly consistent across all locations. The top six (6) to twelve (12) inches below the grass surface appeared to be comprised of typical topsoil. Below the topsoil, ash, and various solid waste materials (glass, metal fragments, ceramic, wood) were observed intermixed with granular fill. The percentage of these components significantly increased at four feet below grade, at which point distinct layers of ash

were observed in select boring locations, at depths of up to approximately fourteen (14) feet below grade.”¹

From those initial borings, W&S recommended that the Town (1) sample additional shallow test pits to better define the thickness of topsoil materials throughout the site, including the playground area; (2) modify the renovation design to limit excavation of the deeper soil and incorporate proven mitigation strategies including capping the field with a geotextile barrier and bringing in additional fill to build up above that barrier; and (3) consider adding the playground area to the scope of the project. The Town agreed with the first two recommendations and directed W&S to move forward with the additional soil borings and a redesign of the project.

The modified design meant that elements of the renovation that required disturbing soil below the top 6-12 inches would no longer be possible including reorienting the Junior Varsity and Varsity fields to maximize site utilization and installing new field lights. The modified design maintains the current field orientation, modernizes the lights while keeping the existing stanchions, and ensures that amenities such as dugouts and spectator seating are anchored to concrete pads, rather than deep posts.

Modifying the design also meant that the Town could not meet the initial project timeline of completing construction for a Spring 2023 opening. Park & Recreation met with user groups and advanced an updated project schedule to: (1) keep softball at Claxton for 2023, while a conversion of McLeod Field at DeFazio from baseball to softball is constructed in the summer/fall 2023 to open in spring 2024 and (2) move softball to McLeod in 2024 while Claxton is renovated for a Fall 2024 opening. This updated schedule is subject to Town Meeting approval of requested FY24 capital funds for construction (\$1.3M for McLeod and \$1.78M for Claxton, \$1M of which also requires approval of the Community Preservation Committee).

In Spring 2022, W&S provided the Town with results from the second round of soil borings.² These samples showed that debris, including glass and plastic shards, was observed 4 to 7 inches below the playground surface. Out of an abundance of caution, the Town immediately removed the playground structures, placed additional soil on top, reseeded with grass and installed a temporary fence around the area. The borings also confirmed the presence of 10 to 12 inches of topsoil free of debris across the field areas, so the fields remained open and available for continued use.

Town staff and W&S discussed whether additional, voluntary testing to determine the chemical make-up of the soil was warranted. Staff recommended to the Park & Recreation Commission that no further testing be done based on these considerations:

- The borings found 12 inches of topsoil, free of debris, across the playing fields.
- Considering the historic use of the site and types of materials that may be present, W&S does not anticipate the generation of landfill gas or upward migration of the waste materials.
- The Town had already decided to modify the design, treating the subsurface materials as if contaminants are present and proactively adding in relevant mitigation strategies. These modifications include capping the fields with a geotextile barrier and building up on the site,

¹ See Addendum A – 1/27/2022 W&S memorandum

² See Addendum B – 09/22/2022 W&S memorandum

without creating surplus soil that would need to be removed offsite. The design will prevent digging beneath the 12 inches of clean fill into the known debris.

The initial soil borings showing topsoil followed by ash material was consistent with the site's history. Fundamentally, the borings did not provide any unexpected data, nor any new information that would prompt a higher-level of concern about the soil make-up compared to what we knew before the borings. The likelihood of contact with materials below the topsoil by children or other park users was considered unlikely. The change in the renovation design to include the geotextile membrane would further mitigate any risk.

In Summer 2022, a DPW contractor working on a nearby watermain project for the Town was given permission to use a portion of Claxton Field as laydown space. While preparing their laydown space, the contractor excavated some soil and piled it on-site with no advanced notice and without the Town's permission. This prompted outreach from a concerned resident to the Board of Health. DPW and the Public Health Department worked with W&S to identify appropriate mitigation strategies for the contractor to take to safeguard the site. All immediate strategies have been implemented with further work to be done by the contractor as the project is closed out.³

In December 2022, the Director of Health and Human Services was contacted by the MA Department of Environmental Protection (DEP). The agency had received a resident complaint through their enforcement portal. In subsequent meetings, DEP has requested that the Town perform further testing on the chemical make-up of the soil. While Claxton Field is not currently regulated under the Massachusetts Contingency Plan, which sets state reporting and mitigation requirements of landowners, DEP's position is that the Town has an obligation to test based solely on the site's historical use as a burn dump.

Upcoming Soil Testing

The Town has re-engaged W&S to undertake this additional soil testing. W&S has created a soil sampling plan, which has been sent to DEP for their review and approval. Once the plan is approved W&S will work to coordinate the timing of soil sampling and analysis. The intention is to complete the work as quickly as possible with the hope of having preliminary results by mid-March. Those preliminary results will help the Town to identify any changes in operation that may result or any follow-up testing needs.

It is the Town's understanding from speaking with DEP and W&S that there are four levels of possible outcomes from the testing. The first and fourth items are the least likely scenarios.

1. The testing finds that the Claxton site has no reportable contamination. This would allow the Town to consider renovation options to the field that would go beyond the topical approach of our current plan.
2. The testing finds some contamination⁴ at Claxton in the subsurface material, but no contamination in the surface material, allowing the surface to continue to be used. The Town will need to work with DEP and file information with them accordingly. The Town would work with W&S and DEP to ensure that appropriate safeguards are in place during the renovation project. Materials would be kept on site and appropriately capped.

³ See Addendum C – 10/12/2022 W&S memorandum

⁴ I.E. concentrations that require reporting to MassDEP

3. The testing finds some contamination at Claxton in the subsurface and surface material. The type of contamination may trigger the immediate closure of the fields. The Town will need to work with DEP and file information with them accordingly. The Town would work with W&S and DEP to ensure that appropriate safeguards are in place during the renovation project. Materials would be kept on site and appropriately capped.
4. The testing finds contamination at Claxton that would require the Town to close the facility and find a way to remove the contamination from the site. This scenario is unlikely as most mitigation processes prefer that materials not be relocated and would only do so in the most extreme circumstances.

Testing of the pile at the disturbed area will also be conducted and recommendations will be provided on how to manage the pile and appropriately cap the site.

The Town had been pursuing the renovation project assuming that the outcomes in scenario 2 were likely and included this mitigation in the original project.

W&S and their Licensed Site Professional will provide Needham guidance through this entire process in managing the site as it currently stands and any future construction project on the site.

Relocation Plan for Activities

Since we will not know the outcome of the soil testing until close to when NHS Softball begins its season, we have proactively made plans to relocate NHS Varsity Softball to the fields at Broadmeadow School and JV Softball to Avery Field. This will provide predictability for the teams' games and practices. The fields will be updated, groomed, and prepared for the high school teams by DPW's Parks and Forestry division prior to the beginning of the season.

Car washes will be moved to Needham High School.

The Park & Recreation Department will work with all other user groups to identify alternative locations for activities that are normally scheduled at Claxton Field. If testing results conclude that the field can remain open, Park & Recreation will be in touch with each group to coordinate a return to Claxton Field versus remaining at an alternative location.

Questions about Health

Needham's public health staff and elected officials worked with contracted experts to research other communities where similar site mitigation efforts have occurred to better understand possible exposures and any known health impacts. Acknowledging that it is impossible to perform a detailed risk calculation for Claxton Field use until test results are known, there are some commonalities and best practices identified by MA DEP and other communities that will serve to guide our initial work.

For instance, it intuitively makes sense that children and adults who are playing on the Claxton Fields are most likely to be exposed to surface soil and not soil that is at depth. Therefore, since a layer of approximately 12 inches of likely clean topsoil overlays the ball fields, it is likely that exposures to potential contaminants in the ash and solid waste materials in deeper soil has been minimal.

Needham's contractor, Weston & Sampson, will collect samples from both the surface and subsurface soils to determine the contaminants that may be present in soil at the property and their

concentrations. Potential contaminants that are typically present at former burn dumps include polycyclic aromatic hydrocarbons and metals. The Town will be able to provide more information on the potential health risks and toxicity once we have data indicating the substances that are present and the concentrations of those substances.

The exact combination of mitigation measures that will be put into place to ensure the health and safety of the community will be developed by the Town of Needham and its contracted vendor, Weston & Sampson, in consultation with MA DEP. Initial plans (developed pre-testing) included laying down a large geotextile membrane on the site and then importing additional clean fill on top of the membrane; this is a proven strategy to mitigate risks from solid waste materials and it has been implemented in a number of parks and fields throughout the Commonwealth.

Next Steps

Late-February W&S will be on-site to take additional soil samples. Specific date to be determined based on DEP approval of the sampling plan and testing equipment availability.

Mid-March Preliminary results

The Town will schedule a second Joint Board/Committee meeting to update members and the public on the results of the soil testing. The results will also inform next steps on the pending FY24 capital budget request for Claxton construction funds prior to May Town Meeting.

Addendums

- A. 1/27/2022 W&S memo
- B. 9/22/2022 W&S memo
- C. 10/12/2022 W&S memo