

MEMORANDUM

TO: Patrick Norton
Associate Director, Facilities & Engineering

FROM: Barry D Cohen
Sr Environmental, Health & Safety Manager

DATE: August 30, 2022

RE: Response - Chubb Global Risk Advisor's Report



The purpose of this memo is to summarize NEB's response to the Chubb Global Risk Advisor's report dated August 15, 2022.

Item 1: The chemicals mentioned in this item were a one-time use, based on a limited number of experiments conducted by a research lab. These chemicals are no longer used and that is why they are not on the current inventory provided. Ethidium bromide is purchased in liquid form only. And the liquid is then diluted down. Only the powder is a respiratory toxin and the powder form was prohibited from purchase a few years ago.

Item 2: Based on current operational activities, NEB believes the NEB Chemical Hygiene Plan is appropriate.

Item 3: NEB believes the attachment to the original application stated that no more than one third of the hazardous materials used in the research building will be used in the Garden Expansion Site. And that is a conservative estimate. Also, a detailed chemical inventory was provided, showing the approximate amounts and hazards posed by material that could potentially be used in the Garden Expansion Site.

Item 4: The amount of sulfuric acid used/stored by the pH neutralization system in the research building constantly goes a bit above or a bit below the threshold amount for submitting a Tier II report. Nevertheless, a Tier II report for reporting year 2021 has been submitted to the Ipswich Fire Department.

Item 5: All of the information stated in this item was sent via email on 6/17/22 to the IFD Fire Prevention Officer (LT Kendall Buhl).

Item 6: This item is related to the well and is not within the scope of the Special Permit.

Item 7: This is in process with NEB consults (Capaccio Environmental) and the third-party treatment plant operator (Weston & Sampson).

Item 8: See response to Item #6

Item 9: All information related to the storage, use and disposal of radioactive materials has been provided. NEB underwent an inspection on March 1-2, 2022 by the Massachusetts Department of Public Health, Radiation Control Program (MADPH-RCP). All aspects of the program (documentation, purchase, use, storage and disposal) were inspected and there were no observations of non-compliance.

Item 10: The comments in this item are regulated by the Massachusetts Department of Environmental Protection (MADEP). A third-party certified hazardous waste management company (Triumvirate Environmental) is onsite 3 days a week to ensure compliance. Tours are always provided to the IFD upon request.

Item 11: The Ipswich Board of Health (Colleen Fermon) received a copy of the NEB Groundwater Discharge Permit upon issue and receives an email copy of the monthly Daily Monitoring reports that are sent by Weston & Sampson to MADEP .

Item 12: As it relates to the use and storage of hazardous materials, NEB has sufficient plans in place to respond to an emergency. The IFD has open access to NEB facilities and the ability to discuss any concerns they may have.

Item 13: NEB participates in the Town of Ipswich Public Safety Oversight Committee.

If you have any questions regarding this memo, please contact me at cohenb@neb.com or (978) 766-4740.