



March 6th, 2023

The Town Councilors of  
Braintree, Massachusetts

Dear Braintree Town Councilors:

We write in follow up to our previous letters calling for an immediate and comprehensive investigation of the public health and safety consequences of the February 16 explosion at the Clean Harbors facility in Braintree.

After attending the Braintree Town meeting/public hearing on February 28th, we have continued concerns and questions about the flawed emergency response to this explosion:

- **Failure to notify the community.** Why was the community not informed promptly and warned to take precautionary measures like closing windows and keeping children indoors pending findings about air quality risks?
- **Failure to disclose the nature of hazard.** The fire chief mentioned that the contents of the trailers is now known and that the hazardous waste originated in Arkansas, yet the public has still not been informed of the specific hazardous materials that were combusted during the chemical fire.
- **Failure to ensure safe storage of hazardous waste.** The chemicals packed together in the trailers required different forms of fire extinguishing materials; it was noted that one material required chemical foam to extinguish and that water would greatly magnify a fire caused by this chemical; safety protocols forbidding the packing of such materials in the same trailer should be strictly enforced.
- **Failure to stock fire fighting materials on-site.** There was no fire-fighting foam in the bays where the trailers caught on fire. This is not acceptable for a company that handles flammable hazardous waste. In addition, one of the nearby fire hydrants was not working.
- **Lack of training in hazmat response.** The fire department acknowledged that it lacked ANY formal hazmat training or training in permitting or inspections. These

trainings are freely available on the FEMA website and should be required for hazmat teams.

- **Lack of VOC air quality monitors** adjacent to the Clean Harbors site or anywhere in the Four Rivers basin. Given the nature of the industrial infrastructure throughout the area, this is unsafe for health.
- **Lack of public safety response and evacuation plan.** Quincy hospital, which is referenced as an evacuation point for patients, no longer exists. The Braintree contact for the fire chief references personnel who left the department many years ago. These plans should be reviewed annually at a minimum.
- **Lack of coordination with surrounding towns.** The town officials of the surrounding towns of Weymouth and Quincy noted that they received no official notification about the fire, even though it occurred in close proximity to very flammable infrastructure in those communities.
- **Lack of adequate safety features at the facility.** Documents from Clean Harbor state that the berms will catch 10% of the tank content. Adequate safety features should include ensuring that berms will catch 100% of tank content and fire fighting materials.

#### **We request that:**

- There will be **immediate and ongoing air quality, soil, and water testing**, and those results should be made publicly available
- Clean Harbors be fined and its license suspended until:
  - 1/ Fire fighting foam and hydrants are installed near the trailer staging area
  - 2/ An evacuation plan and incident command system (ICS) / incident action plan is in place\*
  - 3/ A public information officer (PIO) is appointed to serve under the incident commander for any given event. The PIO can alert the community, media, neighboring towns and liaison officers in the event of such a disaster.
  - 4/ Ensure that the Fire Chief has access to the emergency notification systems for the township so that information channels can be blanketed with warnings about such incidents in the future and preventive measures that must be taken;
  - 5/ Create a comprehensive [201 plan](#); when there is no plan, things are forgotten—like communication, coordination and identification of appropriate fire fighting materials—which was the case in this failed emergency response. The incident commander can institute an ordering procedure and logistics around, for instance, procuring fire fighting foam. It is the role of the incident commander to delegate these jobs, determine needs and activate other sections.

- The plan for testing and disposal of the 400,000 gallons of water used to control the fire and held in tanks on the site be made public
- A qualified, independent company not paid for by Clean Harbors perform the critical analysis of this explosion. According to the Department of Justice, [Tetrattech](#), the company tasked with this analysis, **has fabricated data and submitted more than 200 false reports in its past work.**
- A safety study of all of the interconnected hazards posed by industrial infrastructure in the Fore River Basin be carried out. Evacuation plans must be piloted and proven to be robust.
- That hazmat training is required of all emergency personnel responding to such an incident in Massachusetts.

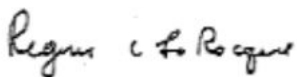
We again urge that the Massachusetts Department of Environmental Protection pursue a root-cause analysis of this explosion and push for tighter regulatory oversight of the Clean Harbors facility and monitoring of the health of those affected by this chemical explosion. The Clean Harbors facility fire demonstrates that the Fore River Basin must update its public safety response and evacuation plan to include the capacity to deal with a large explosion or chemical disaster in this densely populated residential area. Robust evacuation and emergency response plans for residents of the Fore River Basin must be developed and tested.

Suspending regular operations at Clean Harbor, as the Mayor of Braintree has urged in his letter to Clean Harbors, is prudent. As the Mayor states, priority must be placed on addressing these critical issues and developing new safety and evacuation plans.

Sincerely,



Philip J. Landrigan, MD, MSc  
Professor of Biology and Director, Program for Global Public Health & the Common Good  
Boston College



Regina LaRocque, MD, MPH  
Associate Professor of Medicine  
Harvard Medical School



Brita E. Lundberg, MD  
Chair of the Board  
Greater Boston Physicians for Social Responsibility

\*Incident Command System (ICS): A standardized on-scene emergency management construct specifically designed to provide an integrated organizational structure that reflects the complexity and demands of single or multiple incidents, without being hindered by jurisdictional boundaries

