



TOWN OF FRAMINGHAM

Board of Health

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September 9, 2015

Mr. Steven Johnson, Deputy Director
Bureau of Waste Site Cleanup
Massachusetts Department of Environmental Protection
205B Lowell Street
Wilmington, MA 01887

RE: Board of Health Comments
Proposed MCP Supplementary Phase II Scope of Work
Eversource Site, 350 Irving Street, Framingham, MA
RTN 3-0589

Dear Steve:

The Town of Framingham has reviewed the above-referenced MCP filing by GZA GeoEnvironmental, Inc. (GZA) on behalf of NSTAR Gas d/b/a Eversource Energy (Eversource) for the former ComGas Manufactured Gas Plant at 350 Irving Street in Framingham, MA. The Supplementary Phase II Scope of Work was prepared in response to your office's Notice of Audit Findings (NOAF; NON-NE-15-3R025-A) dated June 12, 2015. We understand that your office has provided Eversource/GZA with comments on the initial proposed Phase II Scope and GZA has submitted a revised Phase II Scope of Work for your approval. We have reviewed both the original and the revised Phase II Scope of Work and still have some concerns regarding certain items we would like to see more fully investigated.

We respectfully request that you require Eversource to include the following items during the Phase II investigation:

- 1) **Utilities/infrastructure:** GZA's proposed scope did not fully incorporate MassDEP's request to address these as potential sources and migration pathways. Specifically, the following were not included in the Phase II Scope of Work:
 - a discussion of how the trench location was selected with respect to the previous test pit investigations.
 - an investigation of the steel plate encountered in TP-44, TP-45, and TP-47 that MassDEP refers to in the NOAF.
 - an investigation to locate several underground storage tanks (USTs) identified on historical Site plans as requested by MassDEP.
 - a discussion of the potential for the utility corridor or the concrete pipe to serve as contaminant migration pathways to the southeastern wetlands as requested by MassDEP.

- 2) **Non-aqueous Phase Liquid (NAPL):** The proposed scope should provide more in-depth analysis and evaluation so that the NAPL areas are defined and addressed. The Phase II Scope of Work does not include a discussion of isopleths or similar analysis to evaluate the vertical and spatial nature and extent of NAPL at the site. The Phase II Scope of Work did include documentation of the NAPL recovery efforts to date but did not include documentation requested by MassDEP regarding: (1) product distribution, (2) source identification, (3) migration pathways, or (4) the adequacy of the implemented NAPL source control measures to maintain the Temporary Solution. Additionally, the proposed scope does not address their requirement to characterize the coal tar as requested by MassDEP. It should be clear from the Scope that an evaluation of the NAPL source and migration needs to be completed as part of this work.
- 3) **Soil sampling:** The proposed soil sampling primarily consist of compositing the soil within the 0-3 feet (ft) below ground surface (bgs) interval and the 3 ft bgs to the water table interval. This composite sampling approach has the potential to bias sample results low due to dilution. For example, if higher contamination zones are observed, or field screening indicates higher contamination then those areas should be sampled as discrete samples from smaller zones (e.g., one-foot intervals) and not composited with cleaner zones.
- 4) **Test Pits/Mulch samples:** additional test pits should be conducted in the central portion of the northern portion of the site (north of the aqueduct, where the current Landscape Depot operations are conducted) in order to determine the depths and characteristics of the buried material in this area, as well as to demonstrate whether or not the asphalt pavement is sufficient to prevent the Landscape Depot operations from affecting the subsurface contamination. The goal of the test pit program is to provide a clear understanding of the integrity of the asphalt or other material that is being relied on to prevent direct contact and to demonstrate complete coverage of the contamination. Alternatively, Eversource/GZA could propose another way provide a more definitive map of the integrity and thickness of the asphalt and/or other material that is the basis for their understanding that the subsurface contamination does not pose a significant risk (or Substantial Hazard, as defined in the MCP regulations).

Regarding the mulch sampling, the Board of Health and other Town of Framingham departments and Boards have received numerous queries and concerns regarding the materials such as mulch, loam, and yard/wood waste used, stored, and generated by the operator of the site (Landscape Depot and its sublessees on the property) are at risk of being contaminated by the subsurface contamination. Having Eversource address this issue, which is related to potential exposures and migration pathways, will provide the data that the Town and Board of Health needs to clarify these concerns. We would like to request an expedited sampling of the mulch piles so that these questions and concerns can begin to be addressed.

- 5) **Groundwater sampling:** Additional comprehensive Site-wide groundwater sampling should be conducted to address MassDEP's request for seasonal data. The proposed quarterly sampling, including the 15 new wells to be installed and an additional 5 existing wells (total of 20, is a good start to determine seasonal fluctuations; however, there should be at least two comprehensive round of all wells or the majority of wells (existing and new) prior to setting a more definitive schedule for annual sampling and determining appropriate wells to sample.
- 6) **Risk assessment:** The proposed scope does not address some of the risk assessment-related concerns raised in MassDEP's audit. Specifically, the Phase II Scope of Work:
 - does not discuss using a 95 upper confidence limit (UCL) or maximum concentration for the Exposure Point Concentration (EPC) as recommended by MassDEP.
 - does not include the risk assessment exposure assumptions requested by MassDEP.

- does not address how the failure to demonstrate a Condition of No Substantial Hazard to the Environment exists will be addressed.

7) **Source control:** This is an important component of the Conceptual Site Model and part of the objective of the Phase II investigation. For example, there is no discussion of the USTs, as noted previously. The proposed work should be designed and implemented to demonstrate that all contaminant sources have been eliminated or controlled; how does Eversource/GZA plan to address the NAPL mobility (e.g., tests for viscosity, baildown tests, transmissivity determination, etc.).

We will relay this information to Eversource and their consultant, GZA, so that they are aware of our concerns and requests. If you have any questions, please call Carol Bois, LSP, at (508) 532-5470.

Sincerely,



Michael J. Hugo, Esq.
Chair, Board of Health

Cc: Jonathan Reich, Eversource
Gregg McBride, GZA
Framingham BOH
Mr. Robert J. Halpin, Town Manager