

**REVISED SCOPE OF WORK
SUPPLEMENTAL PHASE II COMPREHENSIVE
SITE ASSESSMENT
350 IRVING STREET
FRAMINGHAM, MASSACHUSETTS
RTN 3-0589**

PREPARED FOR:
NSTAR Gas Company d/b/a/Eversource Energy
Westwood, Massachusetts

PREPARED BY:
GZA GeoEnvironmental, Inc.
Norwood, Massachusetts

July 2015
Revised August 2015
File No. 01.0018640.65

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August 17, 2015
File No. 01.0018640.65

Mr. Stephen Johnson
Deputy Regional Director
Massachusetts Department of Environmental Protection
205B Lowell Street
Wilmington, Massachusetts 01887

Re: Revised Scope of Work (SOW)
Supplementary Phase II Comprehensive Site Assessment (CSA)
Former ComGas Manufactured Gas Plant
350 Irving Street
Framingham, Massachusetts
RTN 3-0000589
NON-NE-15-3R025-A

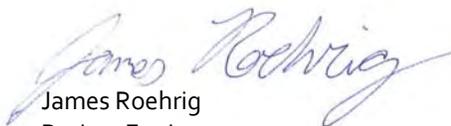
Dear Mr. Johnson:

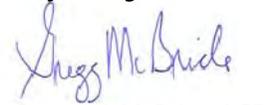
In accordance with the above-referenced Revised Notice of Audit Findings/Amended Notice of Noncompliance (NOAF/NON) and on behalf of NSTAR Gas d/b/a Eversource Energy (Eversource), GZA GeoEnvironmental, Inc. (GZA) has prepared the attached Revised Scope of Work (SOW) to perform a Supplementary Phase II Comprehensive Site Assessment (CSA) of the former ComGas Manufactured Gas Plant on Irving Street in Framingham, Massachusetts. This Phase II SOW outlines tasks to continue the evaluation of the Site conditions documented in earlier reports, and addresses the specific requirements described on Page 14 in Section *DESCRIPTION OF THE ACTIONS TO BE TAKEN AND THE DEADLINES FOR TAKING SUCH ACTIONS* of the NOAF/NON. This SOW was prepared in accordance with the requirements of Section 40.0834 of the Massachusetts Contingency Plan (MCP) (310 CMR 40.0000).

A Comprehensive Response Action Transmittal Form (BWSC108) accompanies this document and a copy of the form is included as Appendix A to the SOW. We look forward to discussing this SOW with you during our upcoming meeting on July 31, 2015 in your office. In the meantime, if you have any questions or require additional information, please do not hesitate to contact the undersigned at 781-278-3700.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.


James Roehrig
Project Engineer


Gregg W. McBride, LSP
Principal


Guy P. Dalton, LSP
Senior Project Manager

Enclosure: Phase II Scope of Work

cc: Jonathan Reich, Eversource



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1.00 INTRODUCTION

GZA GeoEnvironmental, Inc. (GZA) has prepared this revised Scope of Work¹ (SOW) on behalf of NSTAR Gas Company d/b/a Eversource Energy (Eversource) for a Supplemental Phase II – Comprehensive Site Assessment (CSA) of the former Commonwealth Gas Company (ComGas) property, located at 350 Irving Street, in Framingham, Massachusetts (the “Site”). The Site has been assigned Release Tracking Number (RTN) 3-0589 by the Massachusetts Department of Environmental Protection (MassDEP). A Site Locus Map showing the location of the Site with respect to topographic and cultural features in the town of Framingham is attached as Figure 1.

The Site consists of 22 acres of land bounded to the south by Irving Street, to the west by commercial property, to the north by wetlands and Beaver Dam Brook, and to the east by wetlands and an unnamed tributary that discharges to Beaver Dam Brook. The Sudbury Aqueduct, an inactive water supply tunnel owned by the Massachusetts Water Resources Authority (MWRA), bisects the Site from roughly west to east, and divides the property into north and south parcels. The property was used from the late 1880s until 1967 for the operation of a manufactured gas plant (MGP) and tar processing. A Site Plan showing the physical layout of the property, including the historical configuration of the MGP infrastructure², the locations of existing monitoring wells and sampling points, and the locations of proposed Phase II explorations, is attached as Figure 2 and 3. A Site Plan that identifies the owners of each parcel, the individual tenants that lease or sub-lease property, and the potential receptors, is attached as Figure 4.

This SOW outlines the tasks necessary to conduct the Phase II – CSA in conformance with Section 40.0834 of the Massachusetts Contingency Plan (MCP – 310 CMR 40.0000), and supports the Comprehensive Response Action Transmittal Form (BWSC108) contained in Appendix A. This document is subject to the Limitations contained in Appendix B. The Phase II – CSA will be overseen by Mr. Gregg McBride of GZA GeoEnvironmental, Inc., LSP #6048.

2.00 BACKGROUND

GZA has been conducting MCP response actions at the Site since June 2005. The Site was formerly used to operate a MGP from the late 1880s until approximately 1967. Tar processing was also conducted on portions of the property from before 1946 until the early 1960s. Use of the property for these operations has resulted in releases of Oil and/or Hazardous Materials (OHM); including coal tar constituents, cyanide compounds, volatile and extractable petroleum hydrocarbons, and metals possibly related to the use of coal to soil, groundwater and wetland sediment and surface water.

Assessment at the Site has been conducted as early as 1973, including work done on behalf of the New England Gas and Electric Association by the Stone Company (Wayland, MA), the United

¹ The SOW was revised to incorporate comments from MassDEP during the July 31, 2015 meeting.

² The plan was compiled from various historical plans representing different years. It is unlikely that all the historic features existed at the same time.



States Environmental Protection Agency, the 350 Irving Street Trust, and John Mullin of Landscape Depot, Inc. This work includes multiple pre-MCP environmental site assessments, Immediate Response Action (IRA) plans and status reports, a 1998 Phase II/Phase III report, and a 2004 soil berm and groundwater due diligence study.

GZA conducted multiple risk characterizations for the Site including:

- A 2008 Method 3 Risk Characterization,
- A 2009 risk characterization, which evaluated risks associated with exposures to Beaver Dam Brook,
- A 2011 Substantial Hazard Evaluation (SHE), and
- A 2014 Focused Human Health Risk Assessment.

The risk characterizations referenced above were performed based on the soil, groundwater, surface water, wetland soil, and sediment data summarized in the following reports:

- October 2008 Phase II – Comprehensive Site Assessment (CSA);
- January 2009 Phase III – Remedial Action Plan (RAP);
- June 2009 Addendum to the Phase II – CSA
- June 2010 Phase IV – Remedy Implementation Plan (RIP); and

The SHE included in the Class C RAO submitted in 2011 focused on possible exposures to human and environmental receptors considering existing environmental conditions and current uses of the Site. As reported in the June 2011 Temporary Solution document, the calculated Cumulative Receptor Cancer Risk and Non-Cancer Risk were within risk limits established in the MCP. Therefore, it was concluded that a Substantial Hazard to human health does not exist at the Site under current conditions and uses.

Prior to completing the SHE, steps were taken under the 2010 Phase IV to mitigate three identified conditions of Substantial Hazard to the environment at the Site:

- The presence of coal tar in the unnamed stream channel located to the north of the Sudbury Aqueduct;
- Concentrations of cyanide (CN) in surface water located north of the aqueduct; and,
- Concentrations of CN in upland soil located in an area near the southeast boundary of the Site (designated in the Phase II Report as AOC-6).

The excavation and removal of a significant quantity of coal tar from the unnamed stream and the associated man-made channel west of the stream was conducted to mitigate the condition of Readily Apparent Harm (RAH) in the wetlands, and this objective was achieved. Excavation was continued until the extent of visible tar was removed. Approximately 2,400 tons of sediment and soil saturated with coal tar were removed from the two channels at excavated depths ranging from 3 to 14 feet.

Physiologically Available Cyanide (PAC) in surface soil located in AOC-6 was mitigated by excavating and removing one limited area of PAC that exceeded MCP Method 1 Standards during the 2010 Phase IV implementation. A second limited area of PAC in soil had been



covered by a large soil pile imported onto the Site by a former tenant. In July 2011 (following the submission of the RAO), NSTAR conducted a Release Abatement Measure (RAM) in this area that included excavating this limited area of CN-containing soil, regrading the area with imported fill material, relocating a soil berm that surrounded the area and seeding the berm, and collection and analyses for total CN and PAC of samples of surface soil from AOC-6. Concentrations of CN and PAC in the surface soil samples analyzed did not exceed MCP Method 1 Standards for the S-1 soil classification. The RAM Completion Report was submitted to MassDEP in October 2011. All totaled, approximately 201 yd³ of impacted soil were excavated to a depth of 3 feet below ground surface from these two areas.

Since the submittal of the Class C RAO (now referred to as a Temporary Solution under the 2014 MCP), Post-RAO monitoring consisted of periodic sampling in select monitoring wells and piezometers, and at established surface water monitoring stations, and NAPL recovery. GZA has submitted seven post-Temporary Solution status reports which describe the results of the monitoring program which included quarterly NAPL recovery, annual groundwater sampling events for Free Cyanide, and surface water sampling events for Free Cyanide.

3.00 MASSDEP NOTICE OF AUDIT FINDINGS/NOTICE OF NONCOMPLIANCE

On June 12, 2015, MassDEP issued a Notice of Audit Findings/Notice of Noncompliance (NOAF/NON) to Eversource.³ The NOAF/NON identified several compliance issues regarding: (1) the definition of the nature/extent of contamination, (2) the characterization of oil and/or hazardous material, (3) assessment of migration pathways, (4) identification of human receptors, (5) conservative estimation of soil exposure point concentrations, (6) assessment of exposure pathways, (7) demonstration of a condition of No Substantial Harm to the Environment, and (8) contaminant source control or elimination. As part of the NOAF/NON, MassDEP requires submittal of the following:

1. A Scope of Work and Tier Classification Extension by July 15, 2015;
2. A Revised Phase II CSA by September 1, 2016;
3. A Phase III RAP and Phase IV RIP by December 1, 2016; and
4. A Permanent/Temporary Solution or a Remedy Operation Status Submittal by July 3, 2017.

4.00 OBJECTIVES OF THE SUPPLEMENTAL PHASE II – CSA

As defined in Section 40.0833 of the MCP, the purpose of a Phase II – CSA is to collect, develop, and evaluate sufficient information to support opinions and conclusions regarding:

1. the source, nature, extent, and potential impacts of releases of oil and/or hazardous materials (OHM);

³ This NOAF/NON was revised by MassDEP from its initial June 3, 2015, MassDEP NOAF/NON.



2. the risk of harm contaminants at a Site might pose to health, safety, public welfare, and the environment; and
3. the need for and scope of remedial actions to address and mitigate OHM.

Based on the results of assessment activities conducted during Response Actions, the use of the Site for MGP and tar processing operations has resulted in the release of residual by-products derived from the gas manufacturing process. Sources of OHM at the Site that will continue to be assessed during the Supplemental Phase II may include production waste generated during the active life of the plant; wastes originating from leaks, spills, and normal handling of raw materials, process residuals, and waste; residuals present in aboveground or underground process equipment, pipes, tanks, and tar or liquor wells; waste materials from purifier boxes, or contained in former settling lagoons or impoundments; and waste that may have been spread or relocated on-Site during demolition of the plant.

The MGP-related contaminants that will be characterized during the Phase II are Non-Aqueous Phase Liquids (NAPL); light oils, tar-water emulsions, and coal tar, poly-nuclear aromatic hydrocarbons (PAHs), volatile aromatic hydrocarbons (benzene, toluene, ethylbenzene, naphthalene and xylenes), asbestos, and inorganic compounds (cyanide and sulfide). MassDEP has also requested that polychlorinated biphenyls (PCBs) be investigated based on previous sampling results.

5.00 SCOPE OF WORK FOR THE SUPPLEMENTAL PHASE II – CSA

The Scope of Work outlined herein is intended to accomplish the Phase II objectives. The proposed Phase II exploration locations and sampling points are identified on Figures 2 and 3. The sampling locations and sample analyses may be modified during the course of Phase II fieldwork, as field and laboratory results dictate. A proposed sample location plan is included as Figure 2.

Intrusive field activities such as test pit excavation and drilling will be conducted in accordance with the provisions of a Site-Specific Health and Safety Plan (HASp). The HASp will detail the procedures and protocol to be followed in the field during the progression of the field work to address the health and safety of Site personnel. The HASp will contain an inventory of the contaminants that will most likely be encountered during fieldwork, air monitoring requirements, the levels of personal protective equipment (PPE) to be used, and the appropriate PPE upgrade depending on the concentrations of contaminants encountered.

The Phase II – SOW consists of the nine tasks detailed below.

5.10 TASK 1: SUBSURFACE INFRASTRUCTURE INVESTIGATION PLAN

On Page 3 of the NOAF/NON, MassDEP raised concerns regarding the potential for former infrastructure to be acting as a preferential pathway or continuing source of OHM at the Site. GZA proposes the excavation of two trenches at the downgradient edge of the former MGP facilities to investigate the potential presence of preferential pathways for migration of OHM sources (e.g., abandoned pipes) leading to the surrounding Resource Areas. The northern



wetland trench will begin on the upland side of the northern wetland berm near former monitoring well GZ-10 and will extend along the base of the berm to an area adjacent to monitoring well couplet GZ-305. The southern wetland trench will begin on the upland portion of the southern wetland berm beginning near SS-111 and extending along the upland/wetland boundary to an area adjacent to GP-128. For both trenches, the width of the trench will be one excavator bucket width (approximately 3 feet). See Figure 2 for the proposed locations of the trenches.

Each trench will be excavated to the groundwater surface, until a pipe or obstruction is encountered, or until refusal, whichever is encountered first. If pipes are broken during excavation, the interiors will be observed for the presence of MGP residuals. Soil samples will be collected from up to 7 locations along each of the two trenches. One to two samples will be collected from each sample location. A shallow sample (composited from 0 to 3 feet) will be collected from each location and a deeper sample (composited from 3 feet to the water table) will be collected from a subset of these locations. Samples will subsequently be analyzed for Method 8260 volatile organic compounds (VOCs), Method 8270 semi-VOCs (SVOCs), Volatile Petroleum Hydrocarbon (VPH) carbon ranges, Extractable Petroleum Hydrocarbon (EPH) carbon ranges, Total Cyanide (CN), and Physiologically Available Cyanide (PAC). This analytical suite will hence be referred to as the "Site Soil Contaminants of Concern (COCs)." Select sample locations will also be analyzed for PCBs by method 8082. Each trench will be excavated in sections and backfilled upon completion of each section. If fill or other materials are encountered that are unsuitable for reuse, they will be stockpiled and covered with 6 mil polyethylene sheeting for subsequent characterization and off-Site disposal. The length of the trenches may be extended if conditions within the trenches indicate the potential for subsurface pipes may exist.

Metallic pipes, whether located during this trenching work or during other test pitting activities, will be "tagged" with metallic direct burial cable and the remainder of the pipe will subsequently be traced using ground penetrating radar (GPR), magnetometry or another appropriate subsurface utility locating method. Any piping or other potential preferential migration pathways will be georeferenced using a Trimble GeoExplorer 6000 handheld unit.

5.20 TASK 2: SUBSURFACE INFRASTRUCTURE INVESTIGATION PLAN — SOUTH SIDE GAS HOLDERS ASSESSMENT

On Page 4 of the NOAF/NON, MassDEP indicates the need for additional assessment near the former relief gas holder, the former 1,000,000 ft³ gas holder, and the former 3,000,000 ft³ gas holder. Up to eighteen test pits will be completed adjacent to these former gas holder structures. One to two analytical samples will be collected from each test pit for Site Soil COCs. A shallow sample (composited from 0 to 3 feet) will be collected from each location and a deeper sample (composited from 3 feet to the water table) will be collected from a subset of these locations. If the test pit program indicates the presence of saturated coal tar in soil, up to five shallow groundwater monitoring wells will be installed adjacent to the holders to supplement the on-going NAPL recovery program. At a minimum, one shallow monitoring well will be installed to replace former well GZ-204, which was destroyed.

During the July 30, 2015 site visit, MassDEP personnel noted the presence of a crack within the 3,000,000 ft³ gas holder bottom slab. At the request of MassDEP, GZA will collect a sub-slab soil



sample to evaluate soil conditions beneath the gas holder. GZA will collect a composite soil sample to a depth of three feet below grade from beneath the crack.

This Task is intended to determine if there is source area contamination in or around the former gas holders and soil data from this assessment will be used to develop a conservative estimate of the soil exposure point concentration (EPC) for the southern portion of the property.

5.30 TASK 3: SOIL SAMPLING PROGRAM

On Pages 5 and 6 of the NOAF/NON, MassDEP indicates that it believes that there has not been adequate soil analytical data reported to properly characterize the nature and extent of soil impacts. For convenience, the soil sampling programs have been further organized by the areas of concern (AOCs) noted in the Phase II CSA submitted to MassDEP on October 20, 2008. These AOCs are not necessarily all source areas but a convenient way of organizing the investigation and collection of data. This Task is intended to identify possible sources of contamination, delineate the disposal site boundary, identify preferential migration pathways, and to develop conservative soil EPCs.

5.30.1 Task 3.1: AOC-1 (Northern Area of Concern)

Monitoring well GZ-306 was installed in 2008 as part of GZA's initial Phase II CSA. Coal tar impacts were observed in the boring log at depths ranging from 12 to 22 feet below ground surface. Additionally, measurable coal tar was observed in GZ-306 shortly after its installation. However, GZ-306 could not be relocated following its installation and is presumed destroyed. GZA plans to advance three soil borings with two borings completed as groundwater monitoring wells using hollow stem auger (HSA) techniques in the vicinity of the former location of GZ-306 to further delineate the extent of NAPL impacts in that area. Two samples per monitoring well location (a composite from 0 to 3 feet and a composite from 3 feet to the water table) and one sample per boring (a composite from 0-3 feet) will be submitted for analysis for the Site COCs. Samples from select monitoring well locations will also be analyzed for PCBs.

5.30.2 Task 3.2: AOC-2 (Former Old Colony Tar Processing Area - North Side)

Previous explorations along the northwestern and western site boundaries indicated the presence of residual MGP materials. In order to further define the Site boundaries, test pits and/or direct push drilling methods will be utilized to further delineate shallow soil impacts on the western side of the property and within the northern and western portions of the upland. Additionally, MassDEP has raised concerns regarding the lack of analytical data in the area denoted as "Pipes to Independent Coal Tar Company." GZA notes that no underground piping was observed during the original test pit program performed in June 2007 and described in the Phase II CSA test pit logs, and it is possible that the pipes referenced in historical maps were above ground. A total of nine test pits/soil borings are proposed to be installed in AOC-2; five locations will be used to delineate the northwestern boundary of the Site and four will be used to collect soil data adjacent to the presumed location of the aforementioned pipes. One to two samples will be collected from each location for Site COCs. A shallow sample (composited from 0 to 3 feet) will be collected from each location and a deeper sample (composited from 3 feet to the water table) will be collected from a subset of these locations. Additionally, samples in this AOC will be analyzed for PCBs to delineate PCB impacts detected in TP-11.



5.30.3 Task 3.3: AOC-3 (Former Open Tar Well)

MassDEP noted that only one analytical sample was collected from the former open tar well area and that no samples were collected from the coke storage, machine shop, or store house areas. Seven explorations will be advanced to provide additional characterization of the aforementioned areas, the southwestern boundary of the Site, and the areas adjacent to the former open tar well. One to two samples per location will be submitted for analysis for the Site Soil COCs. A shallow sample (composited from 0 to 3 feet) will be collected from each location and a deeper sample (composited from 3 feet to the water table) will be collected from a subset of these locations. Additionally, all samples will be analyzed for PCBs to delineate PCB impacts detected in TP-23. Also, we anticipate excavating and removing remaining wastes from the former open tar well structure later this year into early 2016.

5.30.4 Task 3.4: AOC-4 (Former MGP Area)

Additional soil analytical data will be generated in the vicinity of several MGP structures, including the former transformer pad, boiler house, two oil USTs, and multiple other MGP structures. A total of ten explorations will be conducted in this area. One to two samples per location will be submitted for analysis for the Site Soil COCs. A shallow sample (composited from 0 to 3 feet) will be collected from each location and a deeper sample (composited from 3 feet to the water table) will be collected from a subset of these locations. Additionally, asbestos samples will be collected if visual evidence indicates the potential for asbestos containing material (ACM) and PCB samples will be collected from the exploration adjacent to the former transformer pad and other select areas.

5.30.5 Task 3.5: AOC-5 (Old Colony Tar Company- South Side)

Additional soil samples will be collected for analysis in the vicinity of several former test pit locations and former MGP structures. A total of twenty explorations will be conducted in this area. Additionally, three additional monitoring wells will be used to further delineate the extent of NAPL impacts observed in GZ-7S. One to two samples per exploration or well will be submitted for analysis for the Site Soil COCs. A shallow sample (composited from 0 to 3 feet) will be collected from each location and a deeper sample (composited from 3 feet to the water table) will be collected from a subset of these locations. Select samples will also be analyzed for PCBs. As shown in Table 1, GZ-7S is the only well containing NAPL whose product thickness hasn't been significantly reduced by the quarterly NAPL recovery program which began in June 2012. These monitoring well installations may also assist with the recovery of DNAPL in this area.

5.30.6 Task 3.6: AOC-6 (Spent Oxide Area)

Previous investigation identified this area as consisting of fill with cyanide compounds and other MGP-related constituents. Additional exploration will be completed to collect soil samples and document the depth of fill to augment the existing shallow soil data from this area. A total of seven explorations will be conducted: one to two samples per location will be submitted for analysis for the Site Soil COCs. A shallow sample (composited from 0 to 3 feet) will be collected from each location and a deeper sample (composited from 3 feet to the water



table) will be collected from a subset of these locations. Select samples will also be analyzed for PCBs.

5.30.7 Task 3.7: AOC-7 (Former Coke and Coal Gas Production Area)

Four explorations will be conducted in this area adjacent to a former tar tank, a former gas producer, and two larger unnamed structures near the Coal Bins and Battery area. One to two samples per location will be submitted for analysis for the Site Soil COCs. A shallow sample (composited from 0 to 3 feet) will be collected from each location and a deeper sample (composited from 3 feet to the water table) will be collected from a subset of these locations. Select samples will also be analyzed for PCBs.

5.30.8 Task 3.8: Filled Area of 120 Leland Street Property

Six explorations will be conducted on the 120 Leland Street property to further delineate soil impacts in GZ-307 observed between 5 and 12 feet below ground surface. Two samples per location (a composite from 0 to 3 feet and a composite from 3 feet to the water table) will be submitted for analysis for the Site Soil COCs. Select samples will also be analyzed for PCBs.

5.40 TASK 4: NAPL GAUGING, RECOVERY, AND DATA SUMMARY TABLE

A NAPL summary table is attached as Table 1. This table depicts the gauging data, NAPL thicknesses, a qualitative description of the NAPL, and describes the replacement of oil sorbent socks or the recovery of DNAPL with a peristaltic pump. The wells shown were observed to have measurable thicknesses of NAPL during the April 2011 comprehensive gauging round. During previous investigations, measurable product thicknesses were observed in wells denoted in the table in addition to MW-6, GZ-13D, GZ-16, GZ-204, and GZ-212. Wells GZ-13D, GZ-16, and GZ-212 were gauged during the May 2015 gauging round and no measurable product was detected. Wells MW-6 and GZ-204 have not been located since 2007. GZA anticipates replacing well MW-6 (from the CEA investigation) and GZ-204 during the South Side gas holder assessment described previously in Section 5.20. GZA will continue gauging and recovering product from wells containing NAPL on a quarterly basis. This work will be memorialized in Release Abatement Measure Status Reports. This work is intended to monitor NAPL thicknesses within source areas and to determine if periodic recovery of the NAPL is effective in maintaining source control.

5.50 TASK 5: SURFACE WATER AND GROUNDWATER MONITORING PROGRAM

Eversource will increase the frequency of its groundwater and surface water monitoring program to a quarterly schedule. Samples will be collected from twelve surface water stations: two in the unnamed tributary south of the Sudbury Aqueduct, five in the unnamed tributary north of the Sudbury Aqueduct, and five in Beaver Dam Brook. GZA will submit the surface water samples for analyses for VOCs and SVOCs, and for Total and Free CN via SM-4500CN-C,E and USEPA Method 9016, respectively (“Site Surface Water COCs”).

Additionally, fifteen additional groundwater monitoring wells will be installed near or beyond the northern Site boundary. These wells will include: a medium and deep well adjacent to



GZ-210, a deep well adjacent to GZ-211, a new well cluster approximately 100 feet northeast of former well GZ-306, a new well cluster approximately 100 feet north of GZ-210, a well cluster approximately 100 feet north of GZ-211, and a well cluster off-Site near the intersection of Beaver Street and the Beaver Dam Brook. These wells, in addition to GZ-215, GZ-213S, GZ-213M, GZ-305S, and GZ-305M, will be sampled on a quarterly basis. GZA will submit the groundwater samples for analyses for VOCs, SVOCs, VPH, EPH, and PAC via the MassDEP PAC method (“Site Groundwater COCs”). Additionally, a groundwater elevation gauging round will be conducted for the wells adjacent to the unnamed tributary prior to each quarterly sampling event to further evaluate groundwater flow directions during each sampling event.

On an annual basis, the following existing wells located north of the Sudbury Aqueduct will be sampled: GZ-6S, GZ-6M1, GZ-6M2, GZ-6D, GZ-9S, GZ-9M, GZ-9D, GZ-15D, GZ-201 S, GZ-201M, GZ-216S, and GZ-216M. Due to the larger number of wells on the South Side of the property, GZA will utilize an alternating sampling schedule for these wells. During even years, the following wells will be sampled: GZ-2S, GZ-302S, GZ-302M, GZ-302D, GZ-304S, GZ-304M, GZ-304D, GZ-207, GZ-202, well #4, GZ-16, GZ-212, GZ-213S, and GZ-213M. During odd years, the following wells will be sampled: GZ-1S, GZ-1D, GZ-301S, GZ-301M, GZ-301D, GZ-303S, GZ-303D, GZ-3S, GZ-3M, MW-16, GZ-8M, GZ-8D, GZ-13D, MW-15, GZ-206, GZ-7M, and GZ-7D. All groundwater samples will be analyzed for Site Groundwater COCs.

Prior to the issuance of the NOAF/NON, GZA completed one round of surface water sample and one limited round of groundwater sampling (samples were collected from GZ-210, GZ-211S, and GZ-211M.) The groundwater data were below applicable GW-1 standards with the exception of cyanide in GZ-210 (800 ug/L) and GZ-211S (500 ug/L). These results are similar to previous groundwater sampling rounds and indicate relatively static conditions in this area of the Site.

Surface water analytical results indicated the presence of at least one VOC or SVOC reported above the applicable National Ambient Water Quality Criteria (NAWQC) standard in the seven samples collected from the unnamed tributary. Two samples from Beaver Dam Brook (NS-STA-9 and NS-STA-10) each had detections of 0.05 ug/L for benzo(b)fluoranthene which exceeds the NAWQC standard of 0.00038 ug/L. The remaining samples in Beaver Dam Brook did not indicate the presence of VOCs, SVOCs, or cyanide above applicable laboratory reporting limits. A summary of the groundwater and surface water data is included as Tables 2 and 3.

This work is intended to evaluate the levels of groundwater contamination which may be discharging to surface water during various hydrologic conditions, to further delineate the disposal site boundary, and to develop groundwater EPCs.

5.60 TASK 6: SEDIMENT AND WETLAND SOIL SAMPLING PLAN

Additional wetland soil and sediment sampling will be conducted to evaluate the extent of MGP-related constituents on the rear portions of the 68 and 76/78 Leland Street residential properties, confirm the site boundaries with analytical data in the southern and northern wetlands, and to collect upstream, Site, and downstream sediment samples from Beaver Dam Brook to assess potential non-Site impacts and to delineate impacts near the Site and downstream of the Site. Proposed sample locations are shown on Figure 3. This work is intended to assess the extent of RAH at the Site, the extent of potential sediment impacts in



Beaver Dam Brook, delineate disposal site boundaries, and to develop sediment, wetland soil, and surface water EPCs.

5.60.1 Task 6.1: Residential Property Assessment

Eversource will seek to obtain agreements to access the rear portion of the residential properties at 68 and 76/78 Leland Street. Up to ten shallow samples will be collected from the sediment, wetland soil, and upland soils of the 68 and 76/78 Leland Street properties. Composite samples will be collected using a hand auger from zero to three feet below ground surface. Samples will be analyzed for VOCs, SVOCs (by SIM analysis), VPH and EPH carbon ranges, Total CN, PAC and PCBs (“Site Sediment COCs”).

5.60.2 Task 6.2: Southern Wetland Assessment

Seven shallow samples will be collected along the depicted RAH boundary to assess the non-visible concentrations of OHM which may be present in the wetland. Composite samples will be collected using a hand auger from zero to three feet below ground surface. Samples will be analyzed for Site Sediment COCs.

5.60.3 Task 6.3: Northern Wetland Assessment

Six shallow samples will be collected along the depicted RAH boundary to assess the non-visible concentration of OHM which may be present in the wetland on both the 350 Irving Street property and four shallow samples will be collected from the 125 Beaver Street property located directly to the north of the active railroad line and to the east of the Beaver Dam Brook. Composite samples will be collected using a hand auger from zero to three feet below ground surface. Samples will be analyzed for Site Sediment COCs.

5.60.4 Task 6.4: Beaver Dam Brook Assessment

A total of twelve locations will be sampled: two locations upstream of the Site extending to the northern Adesa property (former General Motors) boundary, seven locations near previous sampling locations SED-401/402, SED-403, SED-404, SED-405, and SED-406, and three locations downstream of SED-406 to a location in the brook near Pumpkin Pine Road. A shallow (0 to 1.5 feet) and a deep (1.5 to 3.0 feet) sample will be collected from each location and analyzed for Site Sediment COCs. Based on the results of the sediment sample analyses, additional downgradient sediment samples will be collected, if warranted, to further define the limits of Site impacts within Beaver Dam Brook.

5.70 TASK 7: SOIL BERM SAMPLING PLAN

A previous assessment conducted by CEA indicated the presence of asbestos in two locations within the North Side berm. The condition of the berm was not characterized in reports and no additional sampling was conducted. GZA proposes to conduct ten shallow test pits within the northern berm and six shallow test pits within the southern berm. Test pit logs will document the condition of the berms and will note any potential visible asbestos impacts. A composite sample from each location will be collected and submitted for Site Soil COCs, PCBs, and asbestos. If asbestos is detected, the samples will be re-run by using EPA Method 600/R-93/116



to quantify the asbestos detected in the sample. If potential asbestos containing material (ACM) is observed, it will be removed from the berm, stockpiled, and covered with polyethylene sheeting until proper disposal can be arranged.

5.80 TASK 8: MULCH STORAGE YARD CHARACTERIZATION

GZA proposes to conduct additional assessment in the mulch storage yard to assess whether OHM in soil or fill are in contact with landscape materials being stored at North Side of the Site. GZA will excavate six test pits in those areas where mulch is not stored on bituminous asphalt pavement to observe the thickness of the recycled soil (Amrec material) and to further assess the extent, if any, of potential MGP impacts in this area. The results of the test pit observations will be incorporated into the Site Conceptual Site Model (CSM) and utilized to prepare cross-sections of the Mulch Storage Yard. Two soil/solids samples will be collected from each test pit: a composite sample from 0 to 0.5 feet and a composite sample from 0.5 feet to the termination depth of the test pit. Additionally, three six-point composite samples will be taken from the base of the mulch piles at the Site. Additionally, GZA will collect a sample from the upper portion of each mulch pile to serve as background mulch samples. Each sample will be analyzed for Site Soil COCs and PCBs.

5.90 TASK 9: REVISED METHOD 3 RISK ASSESSMENT

GZA will revise the Method 3 risk assessment. This will include the following tasks:

5.90.1 Exposure Assessment

GZA will incorporate pre-2008 data collected by CEA/CDM and post-2011 RAO data to supplement the 2008 data tables included in the 2008 Method 3 Risk Characterization. Other pre-2008 data were either already included in the 2008 data tables or were not considered reliable. GZA will also incorporate post-2008 data collected from the Site to supplement the 2008 data tables. Additionally, GZA will review the remediation activities conducted after 2008 and identify samples that are associated with soil/sediment that has since been excavated and disposed off-Site. The identified sample data would be considered no longer representative of the current Site conditions and therefore will not be used to derive EPCs.

GZA will group data into subgroups for the risk characterization. A preliminary list of subgroups is shown below.

Medium	Subgroups	
Soil	1	Northern Paved
	2	Northern Unpaved
	3	Southern Paved
	4	Southern Unpaved
	5	Northern Soil Berm
	6	Southern Soil Berm
Wetland Soil	1	Northern Wetland
	2	Southern Wetland
	3	Residence
Sediment	1	Beaver Dam Brook – Upstream
	2	Beaver Dam Brook



Groundwater	1	Northern Groundwater
	2	Southern Groundwater
	4	Adjacent to Northern Wetland (to evaluate ecological risk)
	5	Adjacent to Southern Wetland (to evaluate ecological risk)
Medium	Subgroups	
Surface Water	1	Northern Surface Water
	2	Southern Surface Water
	3	Beaver Dam Brook – Upgradient
	4	Beaver Dam Brook

Notes:

- i. The South Side is expected to be impacted by NAPL. Therefore, risks via exposure to NAPL-impacted soil should be covered by the evaluation of risks associated with the South Side soil exposure.
- ii. GZA will compile well screen depth and water elevation for each well. Only shallow (screened within 15 feet bgs) groundwater data will be used to develop EPCs for direct contact exposure while all groundwater data could be used to evaluate potential risks to the environment.
- iii. Risks will be evaluated based on the Site only being used for commercial/industrial uses in the future and restricted as such by an AUL. The only residential uses in the vicinity of the Site are on the abutting residential properties (68 and 76/78 Leland Street).

For each grouping of data, GZA will identify samples representative of the current Site conditions. For soil/wetland soil/sediment, the data will further be separated into 0 to 3 feet, 0 to 6 feet and 0 to 15 feet categories to evaluate conditions for different exposure scenarios. For groundwater and surface water, temporal averages will be calculated and used to represent conditions for each monitoring well based on multiple rounds of results. GZA will then identify exposure points for the risk characterization based on the above evaluation. GZA may combine certain subgroups to construct one set of EPCs to simplify the risk characterization.

For each identified exposure point, GZA will evaluate whether or not a hot spot exists. EPCs will be derived for each exposure point (and hot spot, if any). For soil, EPCs in general will be the arithmetic mean concentration of 0 to 3 feet, 0 to 6 feet, or 0 to 15 feet soil, whichever is higher. The EPCs determined this way will be applied to all potential receptors as a screening method to simplify the risk characterization.

The preliminary exposure assessment which will be used as the basis for the risk characterization is shown on Table 4. The potential receptors include emergency/utility workers (exposed to soil and groundwater within the gas utility line area), trespassers (exposed to soil, wetland soil, sediment, and surface water at the Site), adjacent residents (exposed to wetland soil and sediment), and current Site workers working in the northern and southern area, exposed to northern/southern soil, wetland soil, and the soil berm. Future risks for unrestricted use of the property will also be evaluated; however, a condition of No Significant Risk is unlikely to exist at this Site under this scenario even following remediation. Potential human receptors identified for the future use scenario include all the receptors identified for the current Site use scenario and construction workers, exposed to Site soil and groundwater. Additionally, an ecological risk assessment will be conducted for the downstream Beaver Dam Brook portion of the disposal Site. A representativeness evaluation and data usability assessment will also be conducted for additional pre-2008 and post-2008 data.



Proactive by Design

6.00 SCHEDULE FOR SUPPLEMENTAL PHASE II – CSA

According to the timelines specified in the NOAF/NON, the Phase II CSA for the 350 Irving Street Site is due for completion by September 1, 2016. Once the Phase II Scope of Work has been approved by MassDEP, Eversource will begin field work as soon as practicable. Eversource plans to begin by assessing potential exposures in the wetland to the residential receptors located at 68 and 76/78 Leland Street (Task 6.1) and in the mulch yard characterization (Task 8). The remaining scope of work will begin in Fall 2015 and may continue into 2016.

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TABLES

TABLE 1
 MONITORING WELL GAUGING DATA
 350 Irving Street
 Framingham, Massachusetts

Well Location	Date	Depth to LNAPL ² (feet)	Depth to Water ¹ (feet)	Depth to DNAPL ² (feet)	Well Bottom Depth (feet)	DNAPL Thickness (feet)	Product Type	Comments
GZ-1M	27-Apr-11	ND	3.32	31.12	31.3	0.18	Creosote Oil-like	
	06-Jun-12	ND	4.68	31.09	31.3	0.21	Creosote Oil-like	Deployed absorbent sock
	01-Sep-12	ND	3.71	31.24	31.3	0.06	Creosote Oil-like	Replaced absorbent sock
	01-Dec-12	ND	5.17	ND	31.2	ND	Creosote Oil-like	Replaced absorbent sock; product on tip of probe
	20-Mar-13	ND	1.89	31.18	31.3	0.12	Creosote Oil-like	Replaced absorbent sock
	02-Jul-13	ND	1.24	31.24	31.3	0.06	Creosote Oil-like	Replaced absorbent sock
	13-Sep-13	ND	3.14	31.14	31.3	0.16	Creosote Oil-like	Replaced absorbent sock
	26-Nov-13	ND	4.47	ND	31.35	ND	Creosote Oil-like	Replaced absorbent sock; product on tip of probe
	28-Feb-14	ND	3.74	31.17	31.29	0.12	Creosote Oil-like	Replaced absorbent sock
	27-May-14	ND	1.94	ND	31.34	ND	Creosote Oil-like	Replaced absorbent sock
	06-Aug-14	ND	2.47	ND	31.21	ND	Creosote Oil-like	Replaced absorbent sock
	14-Nov-14	ND	3.64	ND	31.25	ND	Creosote Oil-like	Replaced absorbent sock
	05-Mar-15	ND	4.94	ND	31.26	ND	Creosote Oil-like	Replaced absorbent sock
	27-May-15	ND	5.96	ND	31.24	ND	Creosote Oil-like	
	GZ-2M	27-Apr-11	ND	5.79	26.88	27.90	1.02	Creosote Oil-like
06-Jun-12		ND	7.26	ND	26.8	ND	Creosote Oil-like	Deployed oil absorbent sock; Product on tip of probe
01-Sep-12		ND	4.43	ND	26.7	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
01-Dec-12		ND	7.94	ND	26.8	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
20-Mar-13		ND	1.41	ND	26.6	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
02-Jul-13		ND	1.31	ND	26.7	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
13-Sep-13		ND	7.08	ND	26.6	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
26-Nov-13		ND	7.31	ND	26.4	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
28-Feb-14		ND	5.96	ND	26.59	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
27-May-14		ND	1.64	ND	26.54	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
06-Aug-14		ND	2.07	ND	26.31	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
14-Nov-14		ND	6.17	ND	26.23	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
05-Mar-15		ND	7.13	ND	26.42	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
27-May-15		ND	5.49	ND	25.93	ND	Creosote Oil-like	Replaced oil absorbent sock; Product on tip of probe
GZ-2D		27-Apr-11	ND	6.92	65.30	70.0	4.70	Creosote Oil-like
	06-Jun-12	ND	5.97	60.06	70.0	9.94	Creosote Oil-like	Recovered 5 gallons of coal tar
	01-Sep-12	ND	3.67	61.66	68.8	7.14	Creosote Oil-like	Recovered 5 gallons of coal tar
	01-Dec-12	ND	7.71	62.34	70.1	7.76	Creosote Oil-like	Recovered 4.5 gallons of coal tar
	20-Mar-13	ND	1.75	61.43	69.7	8.27	Creosote Oil-like	Recovered 3.5 gallons of coal tar
	02-Jul-13	ND	1.55	62.74	69.5	6.76	Creosote Oil-like	Recovered 5 gallons of coal tar
	13-Sep-13	ND	4.47	61.72	70.0	8.28	Creosote Oil-like	Recovered 4 gallons of coal tar
	26-Nov-13	ND	4.34	63.56	70.2	6.64	Creosote Oil-like	Recovered 2 gallons of coal tar
	28-Feb-14	ND	0.94	67.32	70.0	2.68	Creosote Oil-like	Recovered 3.5 gallons of coal tar
	27-May-14	ND	2.94	65.17	70.0	4.83	Creosote Oil-like	Recovered 2.5 gallons of coal tar
	06-Aug-14	ND	3.64	66.14	69.8	3.66	Creosote Oil-like	Recovered 2.5 gallons of coal tar
	14-Nov-14	ND	7.14	68.93	69.8	0.87	Creosote Oil-like	Recovered 2.5 gallons of coal tar
	05-Mar-15	ND	4.12	ND	69.3	ND	Creosote Oil-like	Product on tip of probe
	27-May-15	ND	0.68	ND	70.0	ND	Creosote Oil-like	Product on tip of probe
	GZ-6D	27-Apr-11	ND	5.78	ND	75.0	ND	Creosote Oil-like
06-Jun-12		ND	7.12	ND	75.5	ND	Creosote Oil-like	Deployed absorbent sock; Product on tip of probe
01-Sep-12		ND	4.67	ND	75.0	ND	Creosote Oil-like	Replaced absorbent sock; Product on tip of probe
01-Dec-12		ND	5.94	ND	75.0	ND	Creosote Oil-like	Replaced absorbent sock; Product on tip of probe
20-Mar-13		ND	5.86	ND	75.0	ND	Creosote Oil-like	Replaced absorbent sock; Product on tip of probe
02-Jul-13		ND	5.70	ND	75.0	ND	Creosote Oil-like	Replaced absorbent sock; Product on tip of probe
13-Sep-13		ND	5.69	ND	75.1	ND	Creosote Oil-like	Replaced absorbent sock; Product on tip of probe
26-Nov-13		ND	6.85	ND	75.0	ND	Creosote Oil-like	Replaced absorbent sock; Product on tip of probe
28-Feb-14		ND	6.58	ND	75.0	ND	Creosote Oil-like	Replaced absorbent sock; Product on tip of probe
27-May-14		ND	3.18	ND	72.3	ND	Creosote Oil-like	Replaced absorbent sock; Product on tip of probe
06-Aug-14		ND	5.18	ND	75.0	ND	Creosote Oil-like	Replaced absorbent sock; Product on tip of probe
14-Nov-14		ND	5.88	ND	75.1	ND	Creosote Oil-like	Replaced absorbent sock; Product on tip of probe
05-Mar-15		ND	9.38	ND	75.2	ND	N/A	
27-May-15		ND	6.36	ND	74.9	ND	N/A	
GZ-7S		27-Apr-11	ND	4.88	26.53	34.0	7.47	Creosote Oil-like
	06-Jun-12	ND	5.99	21.16	32.9	11.74	Creosote Oil-like	
	01-Sep-12	ND	6.12	19.64	32.5	12.86	Creosote Oil-like	Recover 4 gallons of coal tar
	01-Dec-12	ND	6.53	21.43	32.7	11.27	Creosote Oil-like	Recovered 4.5 gallons of coal tar
	20-Mar-13	ND	5.21	20.9	32.9	12.00	Creosote Oil-like	Recovered 5 gallons of coal tar
	02-Jul-13	ND	5.11	22.41	33.1	10.69	Creosote Oil-like	Recovered 3 gallons of coal tar
	13-Sep-13	ND	5.97	23.63	32.8	9.17	Creosote Oil-like	Recovered 5 gallons of coal tar
	26-Nov-13	NM	NM	NM	NM	NM	N/A	Well inaccessible due to snow/ice
	28-Feb-14	ND	6.64	21.32	32.3	11.02	Creosote Oil-like	Recovered 5 gallons of coal tar
	27-May-14	ND	4.53	22.41	32.7	10.28	Creosote Oil-like	Recovered 5 gallons of coal tar
	06-Aug-14	ND	5.94	23.62	32.5	8.89	Creosote Oil-like	Recovered 4.5 gallons of coal tar
	14-Nov-14	ND	4.99	23.94	33.1	9.20	Creosote Oil-like	Recovered 4.5 gallons of coal tar
	05-Mar-15	NM	NM	NM	NM	NM	N/A	Inaccessible due to snow/ice
	27-May-15	ND	6.87	28.17	32.9	4.77	Creosote Oil-like	Recovered 2 gallons of coal tar
	GZ-13S	27-Apr-11	ND	6.25	See Comment	14.1	See Comment	Taffy-like
06-Jun-12		ND	6.61	See Comment	13.9	See Comment	Taffy-like	Could not gauge product thickness due to NAPL viscosity
01-Sep-12		ND	7.49	11.41	13.7	2.29	Taffy-like	Replaced Absorbent Sock
01-Dec-12		ND	8.94	12.77	13.5	0.73	Taffy-like	Replaced Absorbent Sock
20-Mar-13		ND	9.54	12.91	13.4	0.49	Taffy-like	Replaced Absorbent Sock
02-Jul-13		ND	9.45	13.32	13.5	0.18	Taffy-like	Replaced Absorbent Sock
13-Sep-13		ND	6.69	11.5	13.5	2.00	Taffy-like	Replaced Absorbent Sock
26-Nov-13		NM	NM	NM	NM	NM	N/A	Well inaccessible due to snow/ice
28-Feb-14		ND	7.14	11.94	13.4	1.46	Taffy-like	Replaced Absorbent Sock
27-May-14		ND	5.63	12.46	13.5	1.04	Taffy-like	Replaced Absorbent Sock
06-Aug-14		ND	6.69	12.64	13.5	0.86	Taffy-like	Replaced Absorbent Sock
14-Nov-14		ND	7.41	11.99	13.5	1.51	Taffy-like	Replaced Absorbent Sock
05-Mar-15		NM	NM	NM	NM	NM	N/A	Well inaccessible due to snow/ice
27-May-15		ND	8.98	12.43	13.5	1.07	Taffy-like	Replaced Absorbent Sock

Notes:

1. Depth to liquid measurements are obtained using a water level indicator and/or an oil-water interface probe.
2. DNAPL = Dense Non-Aqueous Phase Liquids. LNAPL = Light Non-Aqueous Phase Liquids.
3. ND=Not detected.
4. NM = Not measured

TABLE 2
GROUNDWATER ANALYTICAL RESULTS
350 Irving Street
Framingham, MA

Client Sample Sample Date	Units	GZ-210 05/28/2015	GZ-211S 05/28/2015	GZ-211M 05/28/2015	MA MCP GW-3 Standards
8260B Volatile Organic Compounds					
1,2,4-Trimethylbenzene	ug/L	37.4	2.9	<1	50000
1,3,5-Trimethylbenzene	ug/L	9.2	<1	<1	50000
Acetone	ug/L	32.4	<10	<10	50000
Benzene	ug/L	225	18	<1	10000
Carbon Disulfide	ug/L	7.2	<1	<1	NA
Ethylbenzene	ug/L	111	8.5	<1	5000
Isopropylbenzene	ug/L	5.1	1.4	<1	50000
Naphthalene	ug/L	371	9.5	<1	20000
n-Propylbenzene	ug/L	3.8	1.1	<1	50000
Styrene	ug/L	7.8	<1	<1	6000
Toluene	ug/L	130	<1	<1	40000
Xylene O	ug/L	181	1.7	<1	5000
Xylene P,M	ug/L	193	<2	<2	5000
Xylenes (Total)	ug/L	374	<2	<2	5000
8270D Semi-Volatile Organic Compounds					
2-Methylnaphthalene	ug/L	48.1	<10	<9.3	20000
3+4-Methylphenol	ug/L	65.9	<20	<18.7	NA
Acenaphthene	ug/L	19.7	<10	<9.3	10000
Acetophenone	ug/L	23.2	<10	<9.3	NA
Fluorene	ug/L	18.8	<10	<9.3	40
Naphthalene	ug/L	248	<10	<9.3	20000
Phenanthrene	ug/L	22.8	<10	<9.3	10000
Phenol	ug/L	52.5	<10	<9.3	2000
Classical Chemistry					
Cyanide (PAC)	ug/L	800	500	<5	30
MADEP-EPH Extractable Petroleum Hydrocarbons					
2-Methylnaphthalene	ug/L	35	17.1	<4.7	20000
Acenaphthene	ug/L	12	6.9	<4.7	10000
C11-C22 Aromatics1,2	ug/L	162	<93.5	<93.5	5000
C11-C22 Unadjusted Aromatics1	ug/L	467	115	<93.5	5000
Fluorene	ug/L	11	<4.7	<4.7	40
Naphthalene	ug/L	235	<9.3	<9.3	20000
Phenanthrene	ug/L	12.1	6.4	<4.7	10000
MADEP-VPH Volatile Petroleum Hydrocarbon					
Benzene	ug/L	254	19.4	<1.5	10000
C5-C8 Aliphatics1,2	ug/L	701	<150	<150	50000
C9-C10 Aromatics	ug/L	440	<100	<100	50000
Ethylbenzene	ug/L	164	10.5	<5	5000
Methyl tert-Butyl Ether	ug/L	1.6	<1.5	<1.5	50000
Naphthalene	ug/L	492	11.8	<5	20000
Toluene	ug/L	187	<5	<5	40000
Xylene O	ug/L	254	<5	<5	5000
Xylene P,M	ug/L	193	<10	<10	5000

Notes

1. Bold indicates an exceedance of the applicable GW-3 standard.

TABLE 3
SURFACE WATER ANALYTICAL RESULTS
350 Irving Street
Framingham, MA

Client Sample			SS-STA-1	SS-STA-3	NS-STA-3	NS-STA-5	NS-STA-6	NS-STA-7	NS-STA-8	NS-STA-9	NS-STA-10	NS-STA-11	NS-STA-12	NS-STA-13
Sample Date	AWQC	Units	05/27/2015	05/27/2015	05/27/2015	05/27/2015	05/27/2015	05/27/2015	05/27/2015	05/27/2015	05/27/2015	05/27/2015	05/27/2015	05/27/2015
8260B Volatile Organic Compounds														
1,2,4-Trimethylbenzene	35	ug/L	32	2.8	104	168	86.9	92.5	34.2	<1	<1	<1	<1	<1
1,3,5-Trimethylbenzene	NS	ug/L	9.6	<1	28.2	42.1	16.7	20.5	7.2	<1	<1	<1	<1	<1
4-Isopropyltoluene	NS	ug/L	<1	<1	2.5	2.4	1.1	<1	<1	<1	<1	<1	<1	<1
Acetone	NS	ug/L	<10	<10	<10	<10	14.9	<10	15.8	<10	<10	<10	<10	<10
Benzene	2.2	ug/L	160	17.7	216	264	158	150	88.5	1.0	<1	<1	1.3	<1
Ethylbenzene	530	ug/L	119	12	480	1450	594	570	198	<1	<1	<1	<1	<1
Isopropylbenzene	NS	ug/L	6.7	<1	23.1	31.2	12	12.6	4.4	<1	<1	<1	<1	<1
Naphthalene	NS	ug/L	325	54.7	849	1050	310	389	135	<1	<1	<1	<1	<1
n-Butylbenzene	NS	ug/L	1.2	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1
n-Propylbenzene	NS	ug/L	2.5	<1	5.9	10.1	3.1	3.2	<1	<1	<1	<1	<1	<1
Styrene	NS	ug/L	<1	<1	<1	50.2	7.9	<10.4	1.4	<1	<1	<1	<1	<1
Toluene	1300	ug/L	25	5.7	29.5	666	258	298	94.5	<1	<1	<1	<1	<1
Xylene O	NS	ug/L	89.8	11	264	795	356	364	160	<1	<1	<1	<1	<1
Xylene P,M	NS	ug/L	86.9	10.7	249	1440	512	558	194	<2	<2	<2	<2	<2
Xylenes (Total)	NS	ug/L	177	21.8	512	2240	868	923	353	<2	<2	<2	<2	<2
8270C Semi-Volatile Organic Compounds														
3+4-Methylphenol	NS	ug/L	<18.7	<18.7	<18.7	55.4	<40	42.7	<40	<19	<18.7	<19.8	<19.8	<18.7
bis(2-Ethylhexyl)phthalate	1.2	ug/L	<5.6	<5.6	6.3	<5.6	835	<12	<12	<5.7	<5.6	<5.9	<5.9	<5.6
2-Methylnaphthalene	NS	ug/L	25.9	3.98	59.1	69.1	11	20.1	6.91	<0.19	<0.19	<0.19	<0.19	<0.19
Acenaphthene	20	ug/L	9.6	1.39	34.4	31.9	<10	13.2	6.31	<0.19	<0.19	<0.19	0.19	0.25
Acenaphthylene	NS	ug/L	3.06	0.29	<4.67	<23.4	<10	<10	<2	<0.19	<0.19	<0.19	<0.19	<0.19
Anthracene	8300	ug/L	2.9	0.3	<4.67	<23.4	<10	<10	<2	<0.19	<0.19	<0.19	<0.19	<0.19
Benzo(a)anthracene	0.0038	ug/L	2.25	0.35	<1.17	<5.84	<2.5	<2.5	<0.5	<0.05	<0.05	<0.05	<0.05	<0.05
Benzo(a)pyrene	0.0038	ug/L	1.95	0.33	<1.17	<5.84	<2.5	<2.5	<0.5	<0.05	<0.05	<0.05	<0.05	<0.05
Benzo(b)fluoranthene	0.0038	ug/L	1.76	0.29	<1.17	<5.84	<2.5	<2.5	<0.5	0.05	0.05	<0.05	<0.05	<0.05
Benzo(g,h,i)perylene	NS	ug/L	0.99	0.2	<4.67	<23.4	<10	<10	<2	<0.19	<0.19	<0.19	<0.19	<0.19
Benzo(k)fluoranthene	0.0038	ug/L	0.43	0.08	<1.17	<5.84	<2.5	<2.5	<0.5	<0.05	<0.05	<0.05	<0.05	<0.05
Chrysene	0.0038	ug/L	2.63	0.42	<1.17	<5.84	<2.5	<2.5	<0.5	<0.05	<0.05	<0.05	<0.05	<0.05
Dibenzo(a,h)Anthracene	0.0038	ug/L	0.32	0.06	<1.17	<5.84	<2.5	<2.5	<0.5	<0.05	<0.05	<0.05	<0.05	<0.05
Fluoranthene	130	ug/L	3.82	0.47	<4.67	<23.4	<10	<10	<2	<0.19	<0.19	<0.19	<0.19	<0.19
Fluorene	1100	ug/L	1.18	0.73	8.67	<23.4	<10	<10	<2	<0.19	<0.19	<0.19	<0.19	<0.19
Hexachlorobenzene	0.00028	ug/L	<0.93	<0.19	<4.67	<23.4	<10	<10	<2	<0.19	<0.19	<0.19	<0.19	<0.19
Indeno(1,2,3-cd)Pyrene	0.0038	ug/L	0.95	0.18	<1.17	<5.84	<2.5	<2.5	<0.5	<0.05	<0.05	<0.05	<0.05	<0.05
Naphthalene	NS	ug/L	264	27.8	277	837	195	275	85.1	0.23	<0.19	<0.96	0.8	<0.19
Pentachlorophenol	1.4	ug/L	<4.21	<0.84	<21	<105	<45	<45	<9	<0.84	<0.84	<0.84	<0.84	<0.84
Phenanthrene	NS	ug/L	10.6	0.92	9.48	<23.4	<10	<10	<2	<0.19	<0.19	<0.19	<0.19	<0.19
Pyrene	830	ug/L	5.52	0.66	<4.67	<23.4	<10	<10	<2	<0.19	<0.19	<0.19	<0.19	<0.19
Classical Chemistry														
Cyanide (PAC)	NS	ug/L	100	<5	20	40	100	100	200	<5	<5	<5	<5	<5
Total Cyanide (LL)	NS	ug/L	200	<5	100	200	600	200	400	<5	<5	<5	<5	<5
Free Cyanide	5.2	ug/L	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5

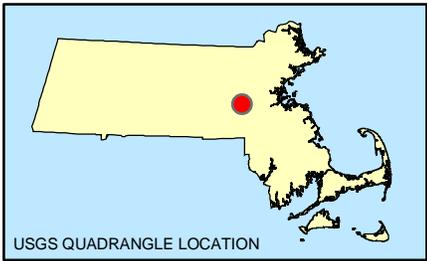
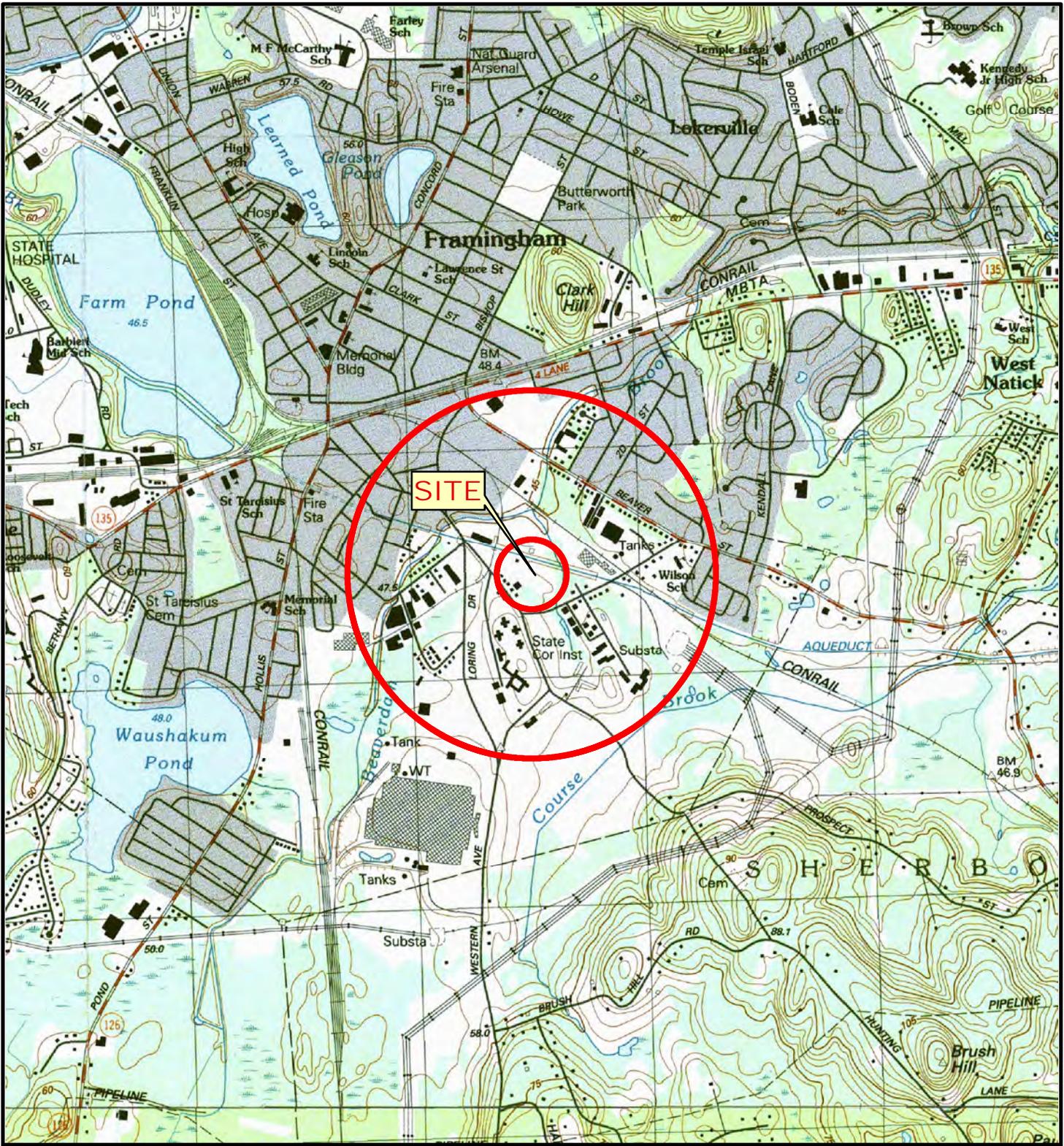
Notes

1. Bold indicates an exceedance of the applicable AWQC standard.

TABLE 4
EXPOSURE ASSESSMENT TABLE
350 Irving Street
Framingham, Massachusetts

Receptor	Exposure Point	Activity	Time	Medium	Exposure Route	Selected for Quantitative Evaluation?	Comments
Facility Workers	Site	Working Outdoors	Current and Future	Surface and Subsurface Soil	Dermal Contact/ Incidental Ingestion	Yes	Workers may contact constituents in surface soil while working outdoors or engaged in other activities outdoors.
				Fugitive Dust	Inhalation	Yes	Dust may be generated while working outdoors in unpaved soil areas.
		Working Indoors	Current	Indoor Air	Inhalation	No	Currently there are limited occupied buildings at the Site; and there are no occupied buildings within 30 feet of groundwater with GW-2 exceedances. The vapor intrusion pathway is not a complete pathway under the current use condition.
Construction Workers	Site	Subsurface Excavation and other Construction	Future	Surficial and Subsurface Soil	Dermal Contact/ Incidental Ingestion	Yes	Construction workers may contact soils during subsurface excavations on the Site. This scenario also includes landscapers and other workers digging into the soil on Site for a short period of time.
				Fugitive Dust	Inhalation	Yes	Soil-derived dust is likely to be generated during subsurface excavation work.
				Groundwater	Dermal Contact	Yes	Depth to groundwater at the Site is approximately 8 feet below ground surface, with occasional perched groundwater observed at depths of 2 feet. Depending on the nature of redevelopment activities or other excavations at the Site, workers may contact groundwater while setting up/dismantling dewatering pumps.
				Ambient Air in a Trench	Inhalation	Yes	Volatile constituents in groundwater represent a potential source of vapors to the ambient air of a trench.
Utility Workers	Existing Subsurface Utility Corridors	Emergency Utility Repair	Current and Future	Surficial and Subsurface Soil	Dermal Contact/ Incidental Ingestion	Yes	Gas Utility workers may contact soils in the vicinity of the subsurface gas lines during repairs.
				Fugitive Dust	Inhalation	Yes	Soil-derived dust is likely to be generated during subsurface excavation work.
				Groundwater	Dermal Contact	No	Depth to groundwater in the utility line area is approximately 8 feet below ground surface, below the utility lines. It is unlikely for utility workers to contact groundwater during the emergency repair work.
				Ambient Air in a Trench	Inhalation	No	Depth to groundwater in the utility line area is approximately 8 feet below ground surface, below the utility lines. It is unlikely for ambient air in the utility trench (normally within 6 feet below ground surface) to be impacted by groundwater.
Trespassers	Site	Walking through the Site	Current and Future	Surficial and Subsurface Soil	Dermal Contact/ Incidental Ingestion	Yes	Residences about the Site to the east. Local residential children (trespassers) may contact constituents in soil within unpaved areas while traversing/playing on the southeast portion of the Site.
				Fugitive Dust	Inhalation	Yes	Soil-derived dust is likely to be generated while traveling/playing on the Site.
				Sediment	Dermal Contact/ Incidental Ingestion	Yes	Trespassers may contact constituents in sediment within the Beaver Dam Brook while playing in the brook.
				Wetland Soil	Dermal Contact/ Incidental Ingestion	Yes	Trespassers may contact constituents in wetland soil while traversing/ playing at the Site.
				Surface Water	Dermal Contact	Yes	Site-related constituents have been detected in surface water samples collected from wetland and Beaver Dam Brook. Trespassers may contact surface water while walking/playing at the wetland and brook.
Residents at 68 and 76/78 Leland Street	Site (68 and 76/78 Leland Street properties)	Walking through the properties	Current and Future	Wetland Soil/Sediment	Dermal Contact/ Incidental Ingestion	Yes	Residents may contact constituents in wetland soil while playing on the property.
				Surface Water	Dermal Contact	Yes	Residents may contact surface water while walking/playing at the property.
Residents at Site (Excluding 68 and 76/78 Leland Street Properties)	Site Outside 68 Leland Street and 76/78 Leland Street Property	Residing at the Site	Current and Future	Soil	Dermal Contact/ Incidental Ingestion	No	The Site is currently a commercial property. In addition, an Activity and Use Limitation (AUL) will be placed on the Site (excluding the 68 and 76/78 Leland Street Properties) that will prohibit residential use in the future.

FIGURES



SOURCE : SCANNED USGS TOPOGRAPHIC QUADRANGLES
 SCANNED BY THE MASSACHUSETTS EXECUTIVE OFFICE OF
 ENVIRONMENTAL AFFAIRS, MASSGIS. DISTRIBUTED JUNE, 2001.



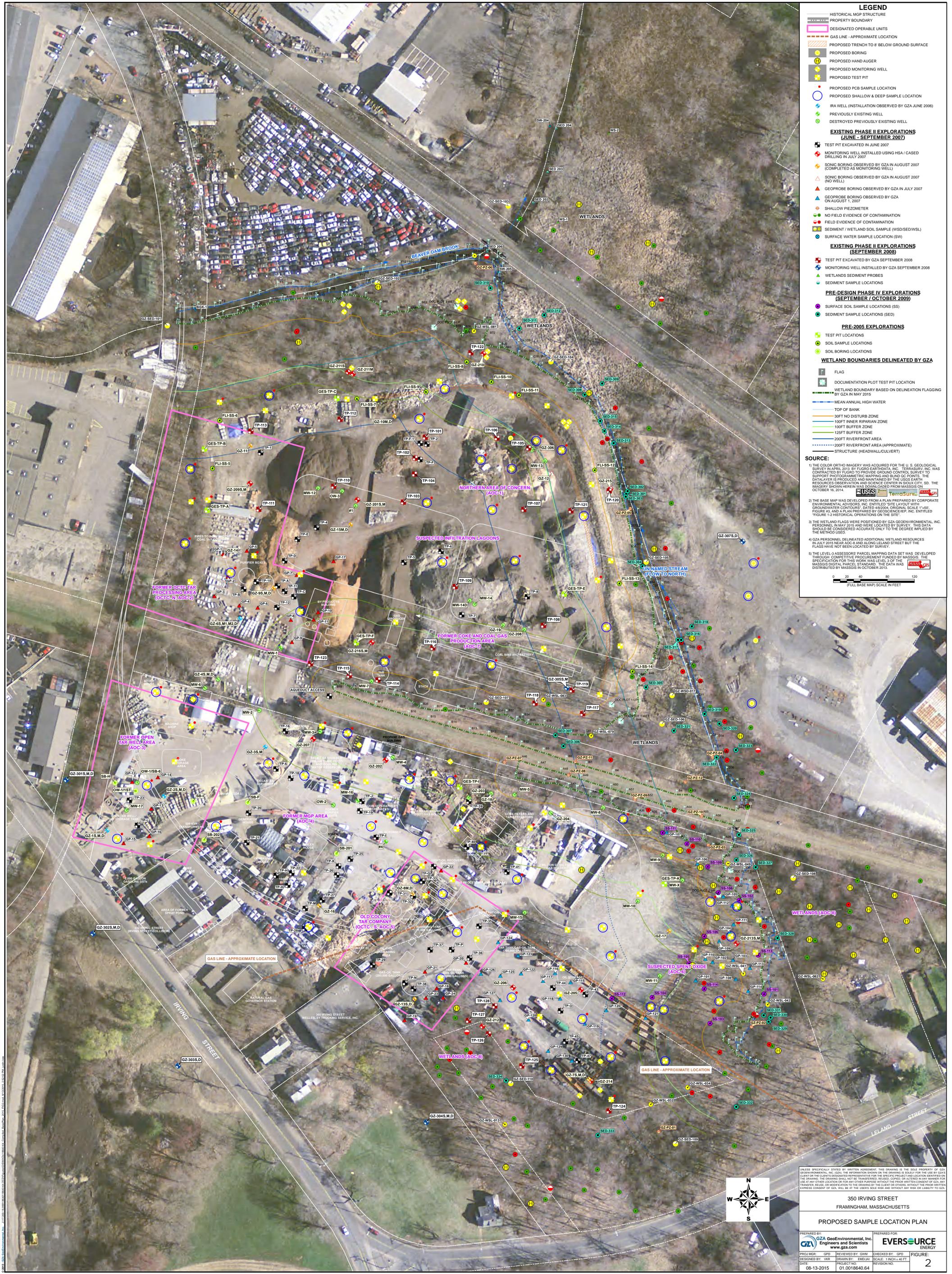
PROJ. MGR.: GPD
 DESIGNED BY: GPD
 REVIEWED BY: GWM
 OPERATOR: EMD
 DATE: 07-10-2015

LOCUS PLAN
 SHOWING 500 FOOT & 1/2 MILE RADII

350 IRVING STREET
 FRAMINGHAM, MASSACHUSETTS

JOB NO.
 01.0018640.65

FIGURE NO.
 1



LEGEND

- HISTORICAL MGP STRUCTURE
- PROPERTY BOUNDARY
- DESIGNATED OPERABLE UNITS
- GAS LINE - APPROXIMATE LOCATION
- PROPOSED TRENCH TO 8' BELOW GROUND SURFACE
- PROPOSED BORING
- PROPOSED HAND AUGER
- PROPOSED MONITORING WELL
- PROPOSED TEST PIT
- PROPOSED PCB SAMPLE LOCATION
- PROPOSED SHALLOW & DEEP SAMPLE LOCATION
- IRA WELL INSTALLATION OBSERVED BY GZA JUNE 2006
- PREVIOUSLY EXISTING WELL
- DESTROYED PREVIOUSLY EXISTING WELL

EXISTING PHASE II EXPLORATIONS (JUNE - SEPTEMBER 2007)

- TEST PIT EXCAVATED IN JUNE 2007
- MONITORING WELL INSTALLED USING HSA / CASED DRILLING IN JULY 2007
- SONIC BORING OBSERVED BY GZA IN AUGUST 2007 (NO WELL)
- SONIC BORING OBSERVED BY GZA IN AUGUST 2007 (NO WELL)
- GEOPROBE BORING OBSERVED BY GZA IN JULY 2007
- GEOPROBE BORING OBSERVED BY GZA ON AUGUST 1, 2007
- SHALLOW PIEZOMETER
- NO FIELD EVIDENCE OF CONTAMINATION
- FIELD EVIDENCE OF CONTAMINATION
- SEDIMENT / WETLAND SOIL SAMPLE (WSD/SED/WSL)
- SURFACE WATER SAMPLE LOCATION (SW)

EXISTING PHASE II EXPLORATIONS (SEPTEMBER 2008)

- TEST PIT EXCAVATED BY GZA SEPTEMBER 2008
- MONITORING WELL INSTALLED BY GZA SEPTEMBER 2008
- WETLANDS SEDIMENT PROBES
- SEDIMENT SAMPLE LOCATIONS

PRE-DESIGN PHASE IV EXPLORATIONS (SEPTEMBER/OCTOBER 2009)

- SURFACE SOIL SAMPLE LOCATIONS (SS)
- SEDIMENT SAMPLE LOCATIONS (SED)

PRE-2005 EXPLORATIONS

- TEST PIT LOCATIONS
- SOIL SAMPLE LOCATIONS
- SOIL BORING LOCATIONS

WETLAND BOUNDARIES DELINEATED BY GZA

- FLAG
- DOCUMENTATION PLOT TEST PIT LOCATION
- WETLAND BOUNDARY BASED ON DELINEATION FLAGGING BY GZA IN MAY 2015
- MEAN ANNUAL HIGH WATER
- TOP OF BANK
- 300 FT NO DISTURB ZONE
- 100 FT INNER RIPARIAN ZONE
- 100 FT BUFFER ZONE
- 125 FT BUFFER ZONE
- 200 FT RIVERFRONT AREA
- 200 FT RIVERFRONT AREA (APPROXIMATE)
- STRUCTURE (HEADWALL/CULVERT)

SOURCE:

- THE COLOR ORTHO IMAGERY WAS ACQUIRED FOR THE U.S. GEOLOGICAL SURVEY IN APRIL 2013 BY FLUOR EARTH DATA, INC. TERRASOFT, INC. WAS CONTRACTED BY FLUOR TO PROVIDE GROUND CONTROL SURVEY TO SUPPORT PHOTOGRAMMETRIC MAPPING AND BUILD GCP POINTS. THE DATA LAYERS IS PRODUCED AND MAINTAINED BY THE USGS EARTH RESOURCES OBSERVATION AND SCIENCE CENTER IN SIOUX CITY, SD. THE MAPS SHOWN HEREIN WERE DERIVED FROM MASSGIS DATA.
- THE BASE MAP WAS DEVELOPED FROM A PLAN PREPARED BY CORPORATE ENVIRONMENTAL ADVISORS, INC. ENTITLED "SITE LAYOUT WITH GROUNDWATER CONTOURS, DATED 4/2004, ORIGINAL SCALE 1"=500' FIGURE #1 AND A PLAN PREPARED BY GEOSCIENCE, INC. ENTITLED "FIGURE 1-3 HISTORICAL OPERATIONS ON THE SITE".
- THE WETLAND FLAGS WERE POSITIONED BY GZA GEORENVIROMENTAL, INC. PERSONNEL IN MAY 2015 AND WERE LOCATED BY SURVEY. THIS DATA SHOULD BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD USED.
- GZA PERSONNEL DELINEATED ADDITIONAL WETLAND RESOURCES IN JULY 2015 NEAR AOC-6 AND ALONG ELAND STREET BUT THE FLAGS HAVE NOT BEEN LOCATED BY SURVEY.
- THE LEVEL 3 ASSESSORS' PARCEL MAPPING DATA SET WAS DEVELOPED THROUGH COMPETITIVE PROCEEDURE FUNDED BY MASSGIS. THE SPECIFICATION FOR THIS WORK WAS LEVEL 3 OF THE MASSGIS DIGITAL PARCEL STANDARD. THE DATA WAS DISTRIBUTED BY MASSGIS IN OCTOBER 2013.

0 20 40 60 80 100 120
FULL BASE MAP SCALE IN FEET

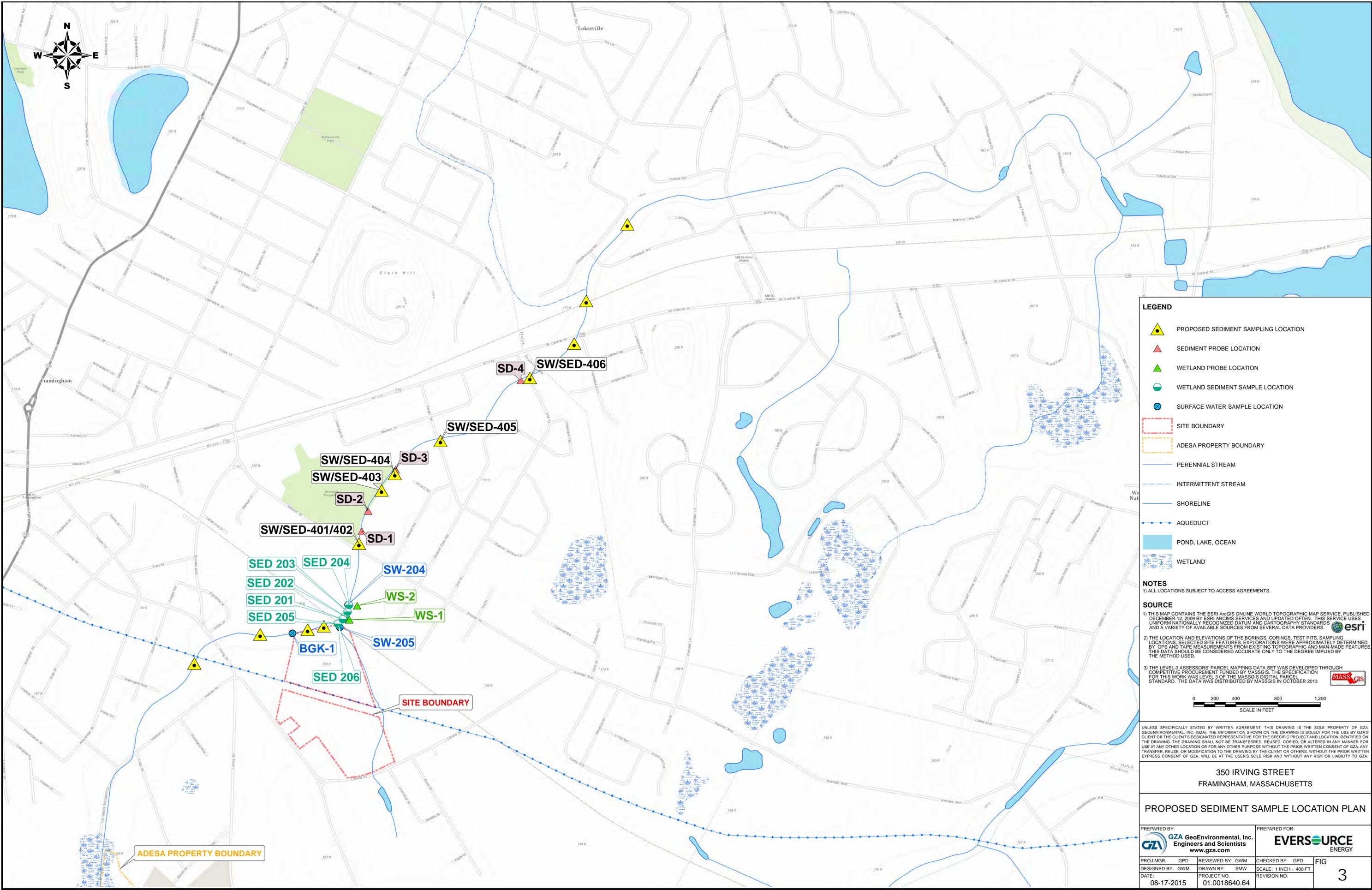
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350 IRVING STREET
FRAMINGHAM, MASSACHUSETTS

PROPOSED SAMPLE LOCATION PLAN

PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com	PREPARED FOR: EVERSOURCE ENERGY
PROJ MGR: GPD	CHECKED BY: GPD
DESIGNED BY: YAK	SCALE: 1"=40' FT
DATE: 08-13-2015	FIGURE: 2

© 2015 - GZA GeoEnvironmental, Inc. - J:\17-000-10-9901\8640-64\DCD\Figures\SIX\SIX018640-64_Sediment Sampling Plan_Expanded_FIG3.mxd, 9/17/2015, 8:52:24 AM, juse@fiv.com



LEGEND

- PROPOSED SEDIMENT SAMPLING LOCATION
- SEDIMENT PROBE LOCATION
- WETLAND PROBE LOCATION
- WETLAND SEDIMENT SAMPLE LOCATION
- SURFACE WATER SAMPLE LOCATION
- SITE BOUNDARY
- ADESA PROPERTY BOUNDARY
- PERENNIAL STREAM
- INTERMITTENT STREAM
- SHORELINE
- AQUEDUCT
- POND, LAKE, OCEAN
- WETLAND

NOTES

- 1) ALL LOCATIONS SUBJECT TO ACCESS AGREEMENTS.

SOURCE

- 1) THIS MAP CONTAINS THE ESRI ArcGIS ONLINE WORLD TOPOGRAPHIC MAP SERVICE, PUBLISHED DECEMBER 12, 2009 BY ESRI ARCS SERVICES AND UPDATED OFTEN. THIS SERVICE USES UNIFORM NATIONALLY RECOGNIZED DATUM AND CARTOGRAPHY STANDARDS AND A VARIETY OF AVAILABLE SOURCES FROM SEVERAL DATA PROVIDERS.
- 2) THE LOCATION AND ELEVATIONS OF THE BORINGS, CORINGS, TEST PITS, SAMPLING LOCATIONS, SELECTED SITE FEATURES, EXPLORATIONS WERE APPROXIMATELY DETERMINED BY GPS AND TAPE MEASUREMENTS FROM EXISTING TOPOGRAPHIC AND MAN-MADE FEATURES. THIS DATA SHOULD BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD USED.
- 3) THE LEVEL 3 ASSESSORS' PARCEL MAPPING DATA SET WAS DEVELOPED THROUGH COMPETITIVE PROCUREMENT FUNDED BY MASSGIS. THE SPECIFICATION FOR THIS WORK WAS LEVEL 3 OF THE MASSGIS DIGITAL PARCEL STANDARD. THE DATA WAS DISTRIBUTED BY MASSGIS IN OCTOBER 2013.

0 200 400 800 1,200
SCALE IN FEET

UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR THE USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSMERGED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.

350 IRVING STREET
FRAMINGHAM, MASSACHUSETTS

PROPOSED SEDIMENT SAMPLE LOCATION PLAN

PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com	PREPARED FOR: EVERSOURCE ENERGY		
PROJ MGR: GPD	REVIEWED BY: GWM	CHECKED BY: GPD	FIG
DESIGNED BY: GWM	DRAWN BY: SMW	SCALE: 1 INCH = 400 FT	3
DATE: 08-17-2015	PROJECT NO. 01.0018640.64	REVISION NO.	

APPENDIX A

TRANSMITTAL FORM BWSC 108



**COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT**

Release Tracking Number

3 - 589

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

A. SITE LOCATION:

1. Site Name: COMMONWEALTH GAS CO
2. Street Address: 350 IRVING ST
3. City/Town: FRAMINGHAM 4. ZIP Code:
5. Check here if the disposal site that is the source of the release is Tier Classified. Check the current Tier Classification Category:
- a. Tier I b. Tier ID c. Tier II

B. THIS FORM IS BEING USED TO: (check all that apply)

1. Submit a **Phase I Completion Statement**, pursuant to 310 CMR 40.0484.
2. Submit a **Revised Phase I Completion Statement**, pursuant to 310 CMR 40.0484.
3. Submit a **Phase II Scope of Work**, pursuant to 310 CMR 40.0834.
4. Submit an **interim Phase II Report**. This report does not satisfy the response action deadline requirements in 310 CMR 40.0500.
5. Submit a **final Phase II Report and Completion Statement**, pursuant to 310 CMR 40.0836.
6. Submit a **Revised Phase II Report and Completion Statement**, pursuant to 310 CMR 40.0836.
7. Submit a **Phase III Remedial Action Plan and Completion Statement**, pursuant to 310 CMR 40.0862.
8. Submit a **Revised Phase III Remedial Action Plan and Completion Statement**, pursuant to 310 CMR 40.0862.
9. Submit a **Phase IV Remedy Implementation Plan**, pursuant to 310 CMR 40.0874.
10. Submit a **Modified Phase IV Remedy Implementation Plan**, pursuant to 310 CMR 40.0874.
11. Submit an **As-Built Construction Report**, pursuant to 310 CMR 40.0875.
12. Submit a **Phase IV Status Report**, pursuant to 310 CMR 40.0877.
13. Submit a **Phase IV Completion Statement**, pursuant to 310 CMR 40.0878 and 40.0879.

Specify the outcome of Phase IV activities: (check one)

- a. Phase V Operation, Maintenance or Monitoring of the Comprehensive Remedial Action is necessary to achieve a Permanent or Temporary Solution.
- b. The requirements of a Permanent Solution have been met. A completed Permanent Solution Statement and Report (BWSC104) will be submitted to DEP.
- c. The requirements of a Temporary Solution have been met. A completed Temporary Solution Statement and Report (BWSC104) will be submitted to DEP.



**COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT**

Release Tracking Number

3 - 589

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

B. THIS FORM IS BEING USED TO (cont.): (check all that apply)

- 14. Submit a **Revised Phase IV Completion Statement**, pursuant to 310 CMR 40.0878 and 40.0879.
- 15. Submit a **Phase V Status Report**, pursuant to 310 CMR 40.0892.
- 16. Submit a **Remedial Monitoring Report**. (This report can only be submitted through eDEP.)
 - a. Type of Report: (check one)
 - i. Initial Report
 - ii. Interim Report
 - iii. Final Report
 - b. Frequency of Submittal: (check all that apply)
 - i. A Remedial Monitoring Report(s) submitted monthly to address an Imminent Hazard.
 - ii. A Remedial Monitoring Report(s) submitted monthly to address a Condition of Substantial Release Migration.
 - iii. A Remedial Monitoring Report(s) submitted every six months, concurrent with a Status Report.
 - iv. A Remedial Monitoring Report(s) submitted annually, concurrent with a Status Report.
 - c. Status of Site: (check one)
 - i. Phase IV
 - ii. Phase V
 - iii. Remedy Operation Status
 - iv. Temporary Solution
 - d. Number of Remedial Systems and/or Monitoring Programs: _____

A separate BWSC108A, CRA Remedial Monitoring Report, must be filled out for each Remedial System and/or Monitoring Program addressed by this transmittal form.
- 17. Submit a **Remedy Operation Status**, pursuant to 310 CMR 40.0893.
- 18. Submit a **Status Report to maintain a Remedy Operation Status**, pursuant to 310 CMR 40.0893(2).
- 19. Submit a **Transfer and/or a Modification of Persons Maintaining a Remedy Operation Status (ROS)**, pursuant to 310 CMR 40.0893(5) (check one, or both, if applicable).
 - a. Submit a Transfer of Persons Maintaining an ROS (the transferee should be the person listed in Section D, "Person Undertaking Response Actions").
 - b. Submit a Modification of Persons Maintaining an ROS (the primary representative should be the person listed in Section D, "Person Undertaking Response Actions").
- c. Number of Persons Maintaining an ROS not including the primary representative: _____
- 20. Submit a **Termination of a Remedy Operation Status**, pursuant to 310 CMR 40.0893(6).(check one)
 - a. Submit a notice indicating ROS performance standards have not been met. A plan and timetable pursuant to 310 CMR 40.0893(6) (b) for resuming the ROS are attached.
 - b. Submit a notice of Termination of ROS.
- 21. Submit a **Phase V Completion Statement**, pursuant to 310 CMR 40.0894.

Specify the outcome of Phase V activities: (check one)

 - a. The requirements of a Permanent Solution have been met. A completed Permanent Solution Statement and Report (BWSC104) will be submitted to DEP.
 - b. The requirements for a Temporary Solution have been met. A completed Temporary Solution Statement and Report (BWSC104) will be submitted to DEP.
- 22. Submit a **Revised Phase V Completion Statement**, pursuant to 310 CMR 40.0894.
- 23. Submit a **Temporary Solution Status Report**, pursuant to 310 CMR 40.0898.
- 24. Submit a **Plan for the Application of Remedial Additives** near a sensitive receptor, pursuant to 310 CMR 40.0046(3).
 - a. Status of Site: (check one)
 - i. Phase IV
 - ii. Phase V
 - iii. Remedy Operation Status
 - iv. Temporary Solution



**COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT**

Release Tracking Number

3 - 589

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

C. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B indicates that a **Phase I, Phase II, Phase III, Phase IV or Phase V Completion Statement** and/or a **Termination of a Remedy Operation Status** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B indicates that a **Phase II Scope of Work** or a **Phase IV Remedy Implementation Plan** is being submitted, the response action (s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B indicates that an **As-Built Construction Report, a Remedy Operation Status, a Phase IV, Phase V or Temporary Solution Status Report, a Status Report to Maintain a Remedy Operation Status, a Transfer or Modification of Persons Maintaining a Remedy Operation Status** and/or a **Remedial Monitoring Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

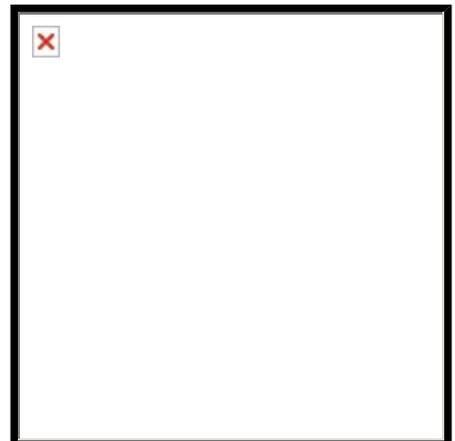
1. LSP#: 6048

2. First Name: GREGG W 3. Last Name: MCBRIDE

4. Telephone: 781-278-3700 5. Ext.: 6. Email:

7. Signature:

8. Date: (mm/dd/yyyy) 9. LSP Stamp:





**COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT**

Release Tracking Number
3 - 589

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

D. PERSON UNDERTAKING RESPONSE ACTIONS:

1. Check all that apply: a. change in contact name b. change of address c. change in the person undertaking response actions
2. Name of Organization: NSTAR GAS CO DBA EVERSOURCE ENERGY CO
3. Contact First Name: JONATHAN 4. Last Name: REICH
5. Street: 1 NSTAR WAY NE250 6. Title: _____
7. City/Town: WESTWOOD 8. State: MA 9. ZIP Code: 020900000
10. Telephone: 781-441-8000 11. Ext: _____ 12. Email: jonathan.reich@eversource.com

E. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RESPONSE ACTIONS: Check here to change relationship

1. RP or PRP a. Owner b. Operator c. Generator d. Transporter
- e. Other RP or PRP Specify: _____
2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
4. Any Other Person Undertaking Response Actions Specify Relationship: _____

F. REQUIRED ATTACHMENT AND SUBMITTALS:

1. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
2. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of any Phase Reports to DEP.
3. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the availability of a Phase III Remedial Action Plan.
4. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the availability of a Phase IV Remedy Implementation Plan.
5. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of any field work involving the implementation of a Phase IV Remedial Action.
6. If submitting a Transfer of a Remedy Operation Status (as per 310 CMR 40.0893(5)), check here to certify that a statement detailing the compliance history for the person making this submittal (transferee) is attached.
7. If submitting a Modification of a Remedy Operation Status (as per 310 CMR 40.0893(5)), check here to certify that a statement detailing the compliance history for each new person making this submittal is attached.
8. Check here if any non-updatable information provided on this form is incorrect, e.g. Release Address/Location Aid. Send corrections to: BWSC.eDEP@state.ma.us.
9. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



**COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT**

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

Release Tracking Number

3 - 589

G. CERTIFICATION OF PERSON UNDERTAKING RESPONSE ACTIONS:

1. I, _____, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

>if Section B indicates that this is a **Modification of a Remedy Operation Status (ROS)**, I attest under the pains and penalties of perjury that I am fully authorized to act on behalf of all persons performing response actions under the ROS as stated in 310 CMR 40.0893(5)(d) to receive oral and written correspondence from MassDEP with respect to performance of response actions under the ROS, and to receive a statement of fee amount as per 4.03(3).

I understand that any material received by the Primary Representative from MassDEP shall be deemed received by all the persons performing response actions under the ROS, and I am aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate or incomplete information.

2. By: _____ 3. Title: _____
Signature

4. For: NSTAR GAS CO DBA EVERSOURCE ENERGY CO 5. Date: _____
(Name of person or entity recorded in Section D) (mm/dd/yyyy)

6. Check here if the address of the person providing certification is different from address recorded in Section D.

7. Street: _____

8. City/Town: _____ 9. State: _____ 10. ZIP Code: _____

11. Telephone: _____ 12. Ext.: _____ 13. Email: _____

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

Date Stamp (DEP USE ONLY:)



APPENDIX B

LIMITATIONS



GEOHYDROLOGICAL LIMITATIONS

Use of Report

1. GZA GeoEnvironmental, Inc. (GZA) prepared this report on behalf of, and for the exclusive use of our Client for the stated purpose(s) and location(s) identified in the Proposal for Services and/or Report. Use of this report, in whole or in part, at other locations, or for other purposes, may lead to inappropriate conclusions; and we do not accept any responsibility for the consequences of such use(s). Further, reliance by any party not expressly identified in the agreement, for any use, without our prior written permission, shall be at that party's sole risk, and without any liability to GZA.

Standard of Care

2. GZA's findings and conclusions are based on the work conducted as part of the Scope of Services set forth in the Proposal for Services and/or Report and reflect our professional judgment. These findings and conclusions must be considered not as scientific or engineering certainties, but rather as our professional opinions concerning the limited data gathered during the course of our work. Conditions other than described in this report may be found at the subject location(s).
3. GZA's services were performed using the degree of skill and care ordinarily exercised by qualified professionals performing the same type of services, at the same time, under similar conditions, at the same or a similar property. No warranty, expressed or implied, is made. Specifically, GZA does not and cannot represent that the Site contains no hazardous material, oil, or other latent condition beyond that observed by GZA during its study. Additionally, GZA makes no warranty that any response action or recommended action will achieve all of its objectives or that the findings of this study will be upheld by a local, state or federal agency.
4. In conducting our work, GZA relied upon certain information made available by public agencies, Client and/or others. GZA did not attempt to independently verify the accuracy or completeness of that information. Inconsistencies in this information which we have noted, if any, are discussed in the Report.

Subsurface Conditions

5. The generalized soil profile(s) provided in our Report are based on widely-spaced subsurface explorations and are intended only to convey trends in subsurface conditions. The boundaries between strata are approximate and idealized, and were based on our assessment of subsurface conditions. The composition of strata, and the transitions between strata, may be more variable and more complex than indicated. For more specific information on soil conditions at a specific location refer to the exploration logs.

6. Water level readings have been made in test holes (as described in the Report) and monitoring wells at the specified times and under the stated conditions. These data have been reviewed and interpretations have been made in this report. Fluctuations in the level of the groundwater however occur due to temporal or spatial variations in areal recharge rates, soil heterogeneities, the presence of subsurface utilities, and/or natural or artificially induced perturbations. The observed water table may be other than indicated in the Report.

Compliance with Codes and Regulations

7. We used reasonable care in identifying and interpreting applicable codes and regulations necessary to execute our scope of work. These codes and regulations are subject to various, and possibly contradictory, interpretations. Interpretations and compliance with codes and regulations by other parties is beyond our control.

Screening and Analytical Testing

8. GZA collected environmental samples at the locations identified in the Report. These samples were analyzed for the specific parameters identified in the report. Additional constituents, for which analyses were not conducted, may be present in soil, groundwater, surface water, sediment and/or air. Future Site activities and uses may result in a requirement for additional testing.
9. Our interpretation of field screening and laboratory data is presented in the Report. Unless otherwise noted, we relied upon the laboratory's QA/QC program to validate these data.
10. Variations in the types and concentrations of contaminants observed at a given location or time may occur due to release mechanisms, disposal practices, changes in flow paths, and/or the influence of various physical, chemical, biological or radiological processes. Subsequently observed concentrations may be other than indicated in the Report.

Interpretation of Data

11. Our opinions are based on available information as described in the Report, and on our professional judgment. Additional observations made over time, and/or space, may not support the opinions provided in the Report.

Additional Information

12. In the event that the Client or others authorized to use this report obtain information on environmental or hazardous waste issues at the Site not contained in this report, such information shall be brought to GZA's attention forthwith. GZA will evaluate such information and, on the basis of this evaluation, may modify the conclusions stated in this report.

Additional Services

13. GZA recommends that we be retained to provide services during any future investigations, design, implementation activities, construction, and/or property development/ redevelopment at the Site. This will allow us the opportunity to: i) observe conditions and compliance with our design concepts and opinions; ii) allow for changes in the event that conditions are other than anticipated; iii) provide modifications to our design; and iv) assess the consequences of changes in technologies and/or regulations.