



Consulting
Engineers
and Scientists

June 20, 2013

Project 111.01095.008

Mr. Chris Moretti
G.B. New England 2, LLC
14 Breakneck Hill Road, Suite 101
Lincoln, Rhode Island 02865

RE: Summary of Massachusetts Contingency Plan (MCP)-Required Response Actions
Proposed CVS Pharmacy/Store No. 10129
Washington and Swanton Streets
Winchester, Massachusetts

Dear Mr. Moretti:

Ransom Consulting, Inc. (Ransom) has prepared this letter presenting a summary of the response actions necessary to facilitate the redevelopment of the above-referenced property (the Site) as specified in the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000). The intent of this letter is to address several comments raised by the Winchester Town Engineer and the Zoning Board of Appeals (ZBA).

BACKGROUND

Release Discovery

In May 1999, a release of gasoline was observed following the removal of underground storage tanks (USTs) from the 10–12 Swanton Street portion of the Site (i.e., the “Bossi’s Automotive”) property; six USTs (a 4,000-gallon gasoline UST, a 3,000-gallon gasoline UST, a 2,000-gallon gasoline UST, a 3,000-gallon diesel fuel UST, a 500-gallon waste-oil UST, and a 500-gallon fuel-oil UST) were removed from this portion of the Site. As a result of the gasoline release, the Massachusetts Department of Environmental Protection (MA DEP) was notified and assigned Release Tracking Number (RTN) 3-18598 to this release. During subsequent response actions completed at this portion of the Site, petroleum-impacted soil and groundwater were identified.

Current Regulatory Status

Based on the results of field investigations, Remediation & Environmental Management Services, Inc. (RemServ) concluded that a Condition of Substantial Hazard did not exist at the Site and the requirements of a Temporary Solution had been met. Therefore, in August 2007, Mr. Thomas Simmons, a Licensed Site Professional (LSP) at RemServe, filed a Class C-2 Response Action Outcome (RAO) Statement with the MA DEP. The Class C-2 RAO Statement indicates that a Condition of Substantial Hazard does not exist at the Site, meaning that conditions at the Site do not pose a risk to human health. The Class A-2 RAO Statement also indicates that response actions to achieve a Permanent Solution are feasible and are to be conducted. For this release, RemServe ultimately implemented Monitored Natural Attenuation

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(MNA) as the Remedial Response Action (RAA) to be employed. MNA relies on the environment's ability to degrade contaminants without assistance; periodic groundwater monitoring is performed to evaluate the changes in contaminants in groundwater. The most recent round of groundwater sampling, completed in March 2012, indicated that contaminant concentrations were generally below their corresponding GW-3 standards (applicable to all groundwaters of the Commonwealth) but above their corresponding GW-2 standards (applicable to sites at which groundwater is present at depths of less than 15 feet and where occupied buildings are located). Therefore, MNA is ongoing.

Based on our review of the response actions completed by RemServe, the Site appears to have been managed to this point in accordance with the requirements of the MCP.

PUBLIC INVOLVEMENT

Petition for Public Involvement Plan Site Designation

A petition requesting the Bossi's Automotive portion of the Site be designated a Public Involvement Plan (PIP) Site was issued to Mr. Simmons on May 3, 2013; a copy of this petition was also submitted to Ms. Karen Stromberg of the MA DEP. As provided by 310 CMR 40.1404(6), upon receipt of a petition for PIP Site designation, the Bossi's Automotive portion of the Site will be designated a PIP Site.

Implications of PIP Site Designation

As provided by 310 CMR 40.1405(5), upon PIP Site designation the following actions are required:

1. Within 80 days of receiving a PIP petition, a draft site-specific PIP Plan must be prepared and a public meeting must be held to present the draft PIP to the public, solicit public comment on the draft PIP, and provide information about environmental conditions at the Site. The public meeting must be held at a time and location convenient to the public. Winchester residents must be informed of the public meeting by the following activities:
 - a. A public notice pursuant to 310 CMR 40.1403(2)(b) must be published at least 14 days prior to the meeting; and
 - b. A copy of the public notice announcing the public meeting must be mailed to each petitioner and to the Winchester Board of Health and Town Manager.
2. The draft PIP Plan must be made available for public review on the date of the public meeting to present it and a public comment period that runs for a minimum of 20 days from the date of the public meeting must be provided.
3. The PIP Plan must be finalized within 30 days of the close of the public comment period on the draft PIP Plan.
4. A summary of comments received on the draft PIP Plan must be developed that contains the comments received, identifies comments that have been incorporated, and provides an explanation for comments that were not incorporated into the final PIP Plan. The copy of

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the response to comments and the final PIP Plan must be made available in the information repository established in the PIP Plan.

5. Copies of all the documents related to the public involvement process must be submitted to the MA DEP upon their availability.
6. The PIP Plan shall be implemented throughout the response action process.

PIP Plan

As provided by 310 CMR 40.1405(6), the PIP Plan must:

1. Identify local concerns and sources of information regarding environmental conditions at the Site (as required by the MCP) through interviews and other appropriate measures and ensure that the implementation of the PIP Plan reflects such concerns and information and the nature and level of relevant public interest;
2. Inform the public about the response action(s) and public involvement processes by methods including, but not limited to, providing notification of the public of a public meeting a minimum of 14 days in advance of the meeting;
3. Provide the name, address and phone number of a contact person for the person(s) conducting the response actions;
4. Provide disposal-site background information, including, but not limited to, a site description and history, material environmental assessment history, and relevant public involvement history;
5. Provide opportunities to comment on response actions by holding a minimum 20-day comment period on all submittals for response actions occurring following PIP Site designation;
6. Incorporate relevant and material public comments into the planning and implementation of response actions;
7. Provide a summary of all public comments received during any comment period within 60 days of the close of the comment period that contains the comments received, identifies comments that have been incorporated, and provides an explanation for comments that were not incorporated into the applicable plan;
8. Ensure that Public Involvement activities are undertaken throughout the response action process and that a schedule is developed for conducting these activities;
9. Establish a public information repository with a location and hours that are convenient to the public; and

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10. Maintain a mailing list that includes at a minimum:
 - a. All individuals who ask to receive information about the site;
 - b. The Town Manager;
 - c. The Board of Health; and
 - d. The MA DEP.

ANTICIPATED MCP ACTIVITIES

As provided by 310 CMR 40.1067(6)(b) and described further in MA DEP policy *Construction of Buildings in Contaminated Areas* dated January 2000, site development activities which disturb, displace, or otherwise may result in exposure to contaminated soil and/or groundwater must be performed as part of a Release Abatement Measure (RAM).

Accordingly, Ransom will prepare a RAM Plan. The RAM Plan will include a site-specific health and safety plan and a soil management plan to be utilized by contractors during earth-work activities at the Site. RAM activities will be overseen by an LSP. At present, Ransom expects the proposed RAM will include the following elements (which have been proven reliable and effective in many similar sites across the Commonwealth and the country) intended to expedite the remediation of petroleum-impacted soil and groundwater at the Site:

1. Excavation and off-site transport of petroleum-impacted soils necessary to facilitate foundation construction and installation of underground utilities;
2. Bioremediation of petroleum-impacted groundwater at the Bossi's Automotive portion of the Site; and
3. Integration of a vapor barrier into the foundation of the proposed CVS Pharmacy/Store building to mitigate potential vapor intrusion.

The RAM Plan will be subject to the public comment requirements of the PIP Plan described above.

Mr. Chris Moretti
G.B. New England 2, LLC

Should you have any questions regarding this letter, please do not hesitate to contact either of the undersigned at (978) 465-1822

Sincerely,

RANSOM CONSULING, INC.



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