

Attachment to BWSC-121

Buckley & Mann Site

Norfolk, Massachusetts

MassDEP RTN: 2-3000173

STATEMENT OF REASON FOR DELAY: The Buckley and Mann Site was impacted by a release from the historical use of on-site wastewater lagoons to treat process water effluent from a former textile manufacturing facility. A Class A-3 Response Action Outcome (RAO) was achieved in 2001 and a Notice of Activity and Use Limitation (AUL) was recorded on August 20, 2001. In September 2017, MassDEP performed an audit of the Class A-3 RAO. The audit identified two violations warranting corrective actions by Buckley & Mann. Buckley & Mann is currently in the process of correcting administrative deficiencies with the Notice of AUL and performing a Stage 1 Environmental Risk Screening to evaluate potential environmental risks.

Since receipt of the NOAF/NON letter, additional sampling has been performed in key areas of the site to facilitate the evaluation of environmental risk. Buckley & Mann intends to use this data to verify the conclusions of the 2001 Class A-3 RAO and maintain the current remedy, including an AUL with revised language to address the deficiencies identified during the MassDEP audit. MassDEP provided a 180-day deadline to address the NOAF. Since there is not adequate time to complete these corrective actions without temporarily taking the site out of compliance with the MCP, Buckley & Mann is retracting the RAO, terminating the AUL, and making a request for tier classification extension while these corrective actions are being implemented.