

Attachment to BWSC-104 Section B

Buckley and Mann Site

Norfolk, Massachusetts

MassDEP RTN: 2-3000173

SECTION B, QUESTION 8 – EXPLANATION OF RETRACTION: The Permanent Solution for the former Buckley & Mann Site was initially submitted as a Class A-3 Response Action Outcome (RAO) by Camp Dresser & McKee (CDM), on behalf of Buckley & Mann, on August 1, 2001. A Notice of Activity and Use Limitation (AUL) was recorded for the site at the Norfolk Registry District of the Land Court on August 20, 2001.

In September 2017, MassDEP conducted an audit of the Class A-3 RAO (now referred to as a Permanent Solution with Conditions). On November 17, 2017, MassDEP issued a Notice of Audit Findings (NOAF) and Notice of Noncompliance (NON) to Buckley & Mann identifying two violations requiring corrective action in order to maintain compliance with the MCP. The first violation identified administrative deficiencies with the AUL that occurred at the time it was originally recorded in 2001. The second violation identified a deficiency in the risk assessment that was conducted to support CDM's finding of No Significant Risk, specifically that "an evaluation of potential risks to environmental receptors was not presented with any detail".

This Permanent Solution is being retracted so that additional environmental response actions can be completed to verify that the site poses No Significant Risk to human health and the environment. A termination of the Notice of AUL is being submitted concurrent with this retraction of the Permanent Solution. A Stage 1 Environmental Risk Screening is being performed to evaluate potential risks to environmental receptors in both terrestrial and wetland habitats. Buckley & Mann intends to complete this analysis and resubmit a Permanent Solution with Conditions Statement within one year of this retraction.