



**DRAFT**

# Public Involvement Plan

**Former Buckley & Mann Site  
17 Lawrence Street  
Norfolk, Massachusetts  
Release Tracking Number 2-3000173**

**Mabbett Project No. R2018016.002  
August 7, 2018**

Prepared for:  
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## ACRONYMS

AUL	Activity and Use Limitation
CDM	Camp, Dresser, and McKee
LSP	Licensed Site Professional
MassDEP	Massachusetts Department of Environmental Protection
MCP	Massachusetts Contingency Plan
NOAF	Notice of Audit Findings
NON	Notice of Noncompliance
OHM	Oil and Hazardous Materials
PAHs	Polycyclic Aromatic Hydrocarbons
PIP	Public Involvement Plan
RAM	Release Abatement Measure
RAO	Response Action Outcome
RCS	Reportable Concentration for Soil
RTN	Release Tracking Number
UST	Underground Storage Tank

## **1.0 INTRODUCTION**

On May 23, 2018, Buckley & Mann, as owner of the Former Buckley & Mann disposal site (the Site) located at 17 Lawrence Street in Norfolk, Massachusetts, received a petition from residents of the Town of Norfolk requesting that the Site be designated as a Public Involvement Plan (PIP) site in accordance with Section 310 CMR 40.1404 of the Massachusetts Contingency Plan (MCP). This regulation requires that, upon receiving such a petition, a plan for involving the public in decisions regarding environmental response actions must be prepared and a public meeting held to present the proposed plan.

The Site was designated as a PIP site on June 12, 2018. Since the Site has been classified as a Tier II site under the applicable provisions of the MCP, the Licensed Site Professional (LSP) for the Site is responsible for overseeing response actions under the MCP, including the public involvement provisions of the regulations. The LSP for this Site is Stephen Vetere (vetere@mabbett.com). Response actions conducted under the MCP may include assessing the nature and extent of contamination; evaluating risks related to Site conditions; assessing whether cleanup actions are necessary; and, if necessary, selecting and implementing the most appropriate actions. As a PIP site, the MCP provides opportunities for public involvement throughout the process.

Public involvement during the environmental response action process is undertaken to ensure that the public is both informed of, and involved in, planning for remedial response actions. Public involvement activities at a PIP site include preparation of this plan, which identifies specific activities that will be undertaken to address public concerns to the extent possible. The remaining sections of this plan include the following:

- Section 2.0 of this plan contains background information on the Site, including the history of industrial operations, the previous environmental assessment and remediation work completed, and public involvement history.
- Section 3.0 of this plan explains how public involvement activities will be conducted during environmental response actions at the Site to address community concerns which have been raised during development of the Plan.
- Section 4.0 explains the proposed public involvement activities.
- Section 5.0 provides a schedule for public involvement activities.
- Section 6.0 outlines the roles and responsibilities of those involved in implementing the PIP. It also explains the procedures the Massachusetts Department of Environmental Protection (MassDEP) will use to address situations if the agency receives complaints about the manner in which the Plan is being implemented.
- Section 7.0 describes how the Plan may be revised during the environmental response action process.

This Draft Public Involvement Plan will be presented by Mabbett, on behalf of Buckley & Mann, at a public meeting to be held on August 7, 2018 at 7:00 PM in the community room at the Norfolk Public Library in Norfolk, Massachusetts. The Draft PIP will be placed into document repositories in the Norfolk and Franklin public libraries and there will be a 20-day public comment period during which Mabbett will accept comments on the Draft PIP. Comments may be submitted at the public meeting or in writing to:

Stephen Vetere, PE, LSP  
Mabbett & Associates  
5 Alfred Circle  
Bedford, MA 01730  
vetere@mabbett.com

Comments should be submitted before the close of business on August 27, 2018. More details relative to the schedule are provided in Section 5.0 of this report.

## 2.0 SITE BACKGROUND

The following sections provide a description of the Site conditions and the Site's regulatory history.

### 2.1 Site Description and History

The former Buckley & Mann Property consists of three parcels of land totaling approximately 140 acres in size that are presently vacant and unoccupied (the Property). The vast majority of the Property (+/- 120 acres) consists of undeveloped, wooded land, however an approximately 20-acre portion of the property (the Site) is the location of a former textile manufacturing facility that is a regulated "disposal site" under the MCP due to a historical release of polycyclic aromatic hydrocarbons (PAHs) and heavy metals.

The Site is bordered by residential properties to the south and east along Lawrence and Park Streets, by the Mill River and undeveloped land to the north, and by undeveloped land and a former gravel pit to the west. The northern portion of the Site is occupied by wetlands associated with Bush Pond, the Mill River, and three former man-made wastewater lagoons. From these low areas of the Site, the topography climbs steeply to the northeast and southwest, with approximately 80 feet of relief in either direction. The Site lies in a topographical valley between these two embankments.

The Site has been vacant and unoccupied since Buckley & Mann ceased operations in 1994, and by 2011 all of the buildings that comprised the industrial complex had been demolished. Currently, the remnants of the concrete slabs of several buildings remain at the Site, and surface features used during industrial operations remain including three wastewater lagoons, a wastewater trench, and a tailrace that was part of a hydroelectric generation system that operated on the Site.

The depth to groundwater across the Site ranges from approximately 3 to 8 feet below ground surface. Groundwater is interpreted to flow in a generally northward direction, ultimately discharging to the Mill River, which flows from east to west through the northern portion of the Site, and ultimately discharges to City Mills Pond approximately 0.8 miles to the north of the former mill complex.

Buckley & Mann operated a textile manufacturing facility at the Site for approximately 90 years, finally ceasing operations at this location in 1994. Over the course of its history at the Norfolk facility, Buckley & Mann operated a "carbonizer" process and a dyehouse, utilized trenches and lagoons for the management and treatment of wastewater, and utilized underground storage tanks (USTs) for the storage of oil. Based on the review of Site history and industrial operations, the following features were identified as potential sources of contamination to the environment:

- Carbonizer Trench and Carbonizer Lagoon, which received wastewater from the carbonizer operation and served to facilitate settling and facultative biological treatment of wastewater.
- Lagoon #1 and Lagoon #2, which received wastewater from the dyehouse and served to facilitate settling and facultative biological treatment of wastewater.
- Area #10, which was a debris disposal area utilized during operation of the facility.

### 2.2 MCP Comprehensive Response Action History

Environmental assessment activities at the Site commenced in 1986 by Buckley & Mann's environmental consultant, Camp Dresser and McKee (CDM). Between 1986 and 1996, CDM characterized the Site and developed a cleanup plan. The remedial strategy included the consolidation of soils with low levels of contamination into a portion of Area #10, with off-Site disposal of only the most highly contaminated soils. A vegetated soil cover would be placed over the consolidated material to provide a barrier to prevent direct contact with contaminated soils. This remedial strategy would be dependent upon implementation of an Activity and Use Limitation (AUL) to prevent excavation of soils greater than 3 feet below ground surface and any activity which may cause physical, chemical, or structural damage to the protective barrier. Site remediation was completed in 1998 and 1999, and



the Site was closed out in 2001 through submittal of a Class A-3 Response Action Outcome (RAO) Statement. A Notice of AUL was recorded for the Site at the Norfolk Registry District of the Land Court on August 20, 2001.

### **2.3 Post-RAO Environmental Sampling Efforts**

The following additional sampling activities have occurred at the Site since the 2001 RAO to support potential redevelopment of the property:

- In 2011, the on-Site buildings were demolished. In September 2013, thirty-eight test pits were excavated through the concrete pads of the former Site buildings in an effort to characterize the soils beneath the pads prior to redevelopment.
- In June 2014, groundwater samples were collected from six on-Site monitoring wells.
- In August 2014, twenty-three additional test pits were excavated on the Site to further characterize the soil in the vicinity of the remaining building slabs.
- In October 2014, surface water samples were collected from Bush Pond and City Mills Pond to evaluate surface water conditions at two locations that receive stormwater drainage from the Site.
- In November 2014, a second set of surface water samples was collected from upstream and downstream locations to evaluate the extent to which surface water contamination could be attributed to runoff from the former Buckley & Mann Site.
- In April 2015, an additional round of groundwater samples was collected from six on-Site monitoring wells.
- In June 2015, groundwater samples were collected from three additional wells located beyond the limits of historical industrial activity to evaluate the extent to which contamination had migrated to potential off-Site receptors.
- In September 2015, additional groundwater samples were collected from five monitoring wells.

Environmental sampling data collected during these assessment activities was consistent with the data collected during response actions and has not revealed any new or additional reporting conditions.

### **2.4 2017 MassDEP Audit**

In September 2017, MassDEP conducted an audit of the Class A-3 RAO (now referred to as a Permanent Solution with Conditions). Audits of this type are common under the MCP, as the MCP is a privatized cleanup program that relies upon the opinions of LSPs to determine the adequacy of environmental remediation measures, and MassDEP is mandated by statute to audit a portion of these opinions. MassDEP may initiate, at any time, an audit of any site subject to an AUL.

MassDEP issued a Notice of Audit Findings/Notice of Noncompliance (NOAF/NON) to Buckley & Mann on November 17, 2017 describing the deficiencies identified during the audit. The letter can be reviewed on the MassDEP on-line file viewer at the following link:

<http://eeaonline.eea.state.ma.us/EEA/fileviewer/Default.aspx?formdataid=0&documentid=423796>

The following is a summary of violations described in the NOAF/NON letter:

- Violation #1: MassDEP identified three deficiencies related to the Notice of AUL.
  - Richard Mann signed the AUL as President and Treasurer of Buckley & Mann, however the AUL did not contain documentation verifying the signatory authority as required by the MCP.
  - The Permanent Solution was predicated on restricting residential use, however the AUL did not contain an explicit prohibition of residential use.

- Prior to recording the AUL, current holders of any record interests in the AUL area must be notified by certified mail of the existence of the AUL. Documentation was not provided to MassDEP to verify that this notification was made to record interest holders.
- Violation #2: MassDEP acknowledged that a Method 1 human health risk assessment was performed for the Site, but that a Stage 1 Environmental Screening should have been performed as part of the risk assessment.

MassDEP provided Buckley & Mann with 180 days to take action by either a) correcting these deficiencies and resubmitting a Permanent Solution Statement with AUL or b) terminating the AUL, retracting the Permanent Solution, and establishing a schedule for correcting the violations.

In order to complete the Stage 1 Environmental Screening, additional site assessment activities were completed in the Carbonator Trench, Carbonator Lagoon, and Tail Race. In March 2018, additional soil samples were collected from each of these areas to characterize the nature and extent of contamination. In April 2018, additional soil sampling was performed within the Carbonizer Lagoon in an effort to delineate the horizontal and vertical extent of contamination in areas where metals and PAHs were detected above reportable concentrations during the March 2018 sampling effort.

On July 20, 2018, Buckley & Mann submitted a revised release notification for RTN 2-3000173 to formally document the detection of antimony, cadmium, and 2-methylnaphthalene in soil above RCS-1 during the March 2018 sampling effort. These detections do not represent a new release condition since RTN 2-3000173 already addresses a release of metals and PAHs to soil, but this revised notification was submitted in the interest of completeness and transparency.

On May 14, 2018, Buckley & Mann terminated the AUL, retracted the Permanent Solution, and filed a Tier Classification Extension. Once Buckley & Mann addresses the two violations noted above by correcting the identified deficiencies, a Permanent Solution With Conditions Statement (including an AUL) will be resubmitted for the Site.

## **2.5 Public Involvement History**

On May 23, 2018, Buckley & Mann received a petition from residents of the City of Norfolk requested that the Site be designated a PIP site in accordance with 310 CMR 40.1404. On June 12, 2018, Buckley & Mann formally responded to the petition, designating the Site as a PIP site, and began to develop a Draft PIP and conduct public involvement activities. In developing this PIP, Mabbett solicited input from all 42 petitioners and officials from the Town of Norfolk on their concerns relative to environmental issues at the Site. Feedback received from community members and Town officials is presented in Exhibit I.

### **3.0 ADDRESSING PUBLIC CONCERNS**

The process for assessing and cleaning up disposal sites, as set forth in the MCP (310 CMR 40.0000), is designed to address the effects of a site on health, safety, public welfare, and the environment. Once a release of oil or hazardous materials (OHM) has been confirmed at a disposal site, it is reported by an LSP to MassDEP (Phase I of the response action process), who assigns a Release Tracking Number (RTN). Once assigned an RTN, the environmental response action process generally proceeds to:

- Comprehensive field investigation to determine the nature and extent of the contamination, and an evaluation of any risks posed to the public and the environment from the Site (Phase II).
- Identification and evaluation of remedial response action alternatives and selection of feasible measures that will achieve a permanent cleanup at the Site (Phase III); and
- Implementation of the selected remedial response actions (Phase IV).

At any point in this process, if the criteria for achieving a “Permanent Solution” is achieved, then a Permanent Solution Statement may be filed providing the evidence required to demonstrate that a condition of No Significant Risk exists with respect to environmental contamination.

Typically, at each step of the remedial response action process, plans for work are developed, the work is conducted, and reports describing results and recommendations for the next step are prepared. The documents which describe each of these steps are the cornerstone of the remedial response action planning process, since they provide the information necessary to make decisions about how a release should be addressed so that potential risks to human health or the environment are mitigated.

As noted in Exhibit I, the public has raised a number of concerns about the Site. The environmental response action planning process is designed to address the concerns about the nature and extent of contamination; risks posed by the Site to health, safety, public welfare, and the environment; and the adequacy of proposed risk mitigation measures. These concerns are primarily addressed in Phase II of this process. For example, the assessment of potential human health and environmental risks posed by site contamination is considered in Phase II of the MCP process.



## 4.0 PUBLIC INVOLVEMENT ACTIVITIES

In accordance with the MCP, activities undertaken to involve the public in response actions serve two purposes:

- To inform the public about the risks posed by the Site, the status of remedial response actions, and the opportunities for public involvement.
- To solicit the concerns of the public about the Site and remedial response actions so that, to the extent possible, these concerns can be addressed and incorporated in planning remedial response actions.

To meet each of these objectives, Buckley & Mann proposes to undertake specific activities during the remedial response process at the Site. These activities are described below.

### 4.1 Informing the Public

Buckley & Mann will provide Site-specific information to the public by establishing information repositories; developing and maintaining a Site mailing list to distribute information about the Site; and providing advance notification to local officials and residents about Site assessment and cleanup activities.

#### 4.1.1 Information Repositories

Publicly Available Site Files: A file on the Site is maintained at the MassDEP Central Regional Office. The file contains all MCP documentation pertaining to the Site with the exception of any enforcement-sensitive material. Appointments to view the Site files can be made by contacting the Central Regional Office File Review office at (508) 767-2884. Appointments are available on Tuesdays and Thursdays from 9:00 AM to 12:00 PM. The Central Regional Office is located at 8 New Bond Street in Worcester.

Alternatively, files can be viewed on the internet using MassDEP's on-line Waste Site/Reportable Release File Viewer: <http://eeaonline.eea.state.ma.us/EEA/fileviewer/Rtn.aspx?rtn=2-3000173>.

Local Information Repositories: Buckley & Mann will maintain two local information repositories to provide residents with easy access to information about the Site assessment process and the results of Site investigations. The Site information repositories will contain complete copies of the files submitted to MassDEP since PIP designation, and will include information such as:

- *Public Involvement Plan Interim Guidance for Waiver Sites* (MassDEP's guidance for preparation of Public Involvement Plans developed in 1991, as well as additional guidance provided by MassDEP in 2017)
- This Public Involvement Plan
- Technical reports and documents summarizing results and recommendations
- Relevant correspondence
- Public meeting summaries
- Summaries of responses to comments received
- Copies of public notices about the Site

Information will be sent to the repository by Buckley & Mann as it is developed. The information repositories for the Site are located at:

Norfolk Public Library  
139 Main Street  
Norfolk, MA 02056  
(508) 528-3380  
[norfolkpl@sailsinc.org](mailto:norfolkpl@sailsinc.org)  
Monday-Thursday 10:00 AM to 7:30 PM  
Friday 10:00 AM to 4:00 PM, Saturday 10:00 AM to 2:00 PM

Franklin Public Library  
118 Main Street  
Franklin, MA 02038  
(508) 520-4941  
Monday-Thursday 9:00 AM to 8:00 PM  
Friday-Saturday 9:00 AM to 5:00 PM  
Sunday (September to May only) 1:30 PM to 5:00 PM

#### **4.1.2 Site Mailing List**

A mailing list has been established for the Site. The Site mailing list initially includes all of the petitioners who signed the May 23, 2018 petition to establish a PIP, and will include all individuals who ask to receive information about the Site. The mailing list also includes MassDEP, the Chairperson of the Norfolk Board of Selectmen, the Chairperson of the Norfolk Board of Health, the Town Administrator, and Chairperson of the Zoning Board of Appeals. The mailing list will be used to announce upcoming public meetings, provide notice of public comment periods and the availability of documents in the information repositories, and any other relevant information about the Site. Buckley & Mann will maintain the mailing list and update it as necessary.

Anyone wishing to be added to the mailing list can write to Stephen Vetere at Mabbett & Associates, 5 Alfred Circle, Bedford, Massachusetts 01730, or by email at [vetere@mabbett.com](mailto:vetere@mabbett.com). Please specify whether you would like to receive notices by email, USPS, or both, and provide the appropriate contact information. The current mailing list is provided in Exhibit II.

#### **4.1.3 Notification to Local Officials and Residents of Major Milestones and Events**

The MCP requires community notification of major planning and implementation milestones at disposal sites. Major milestones include:

- Start of field work involving:
  - Implementation of any Immediate Response Action for an Imminent Hazard
  - Implementation of any Release Abatement Measure
  - Use of a respirator or Level A, B, or C protective clothing
  - Residential sampling
  - Phase IV Remedial Activities
- Completion of each phase:
  - Phase Reports
  - Immediate Response Action Completion Statements
  - Permanent or Temporary Solution Statements
  - Activity and Use Limitations (deed restriction)
  - Downgradient Property Status Opinions

Notification of field work will include information on the type of work and its approximate duration. Notification will be made by Buckley & Mann to the people on the Notification List by email or telephone the day before

activity is scheduled to begin. Notification at the end of a remedial phase will include a summary of the phase report and information on where the report can be reviewed. Those to be notified include:

**TABLE 1**  
**NOTIFICATION LIST**

<b>Name</b>	<b>Affiliation</b>	<b>Address, Phone, and email</b>
Sandra Myatt	Lead Petitioner	8 Eric Road Norfolk, MA 02056 friendsoflawrencecest@gmail.com
Jack Hathaway	Town Administrator	Town Hall One Liberty Lane, 2nd Floor, Rm 205 Norfolk, MA 02056 jhathaway@norfolk.ma.us
Jim Lehan	Board of Selectmen	Town Hall One Liberty Lane, 2nd Floor Norfolk, MA 02056 jlehan@norfolk.ma.us
Thomas Gilbert	Board of Health	Town Hall One Liberty Lane, Room 105C Norfolk, MA 02056 t.gilbert@neu.edu
Richard McCarthy	Town Planner	Town Hall One Liberty Lane Norfolk, MA 02056 rmccarthy@norfolk.ma.us
Christopher Wider	Zoning Board of Appeals	Town Hall Room 105C One Liberty Lane Norfolk, MA 02056 chris@aquabarriers.net
Representative Shawn Dooley	State Representative	State House 24 Beacon Street, Room 167 Boston, MA 02133 Shawn.Dooley@mahouse.gov
Senator Richard Ross	State Senator	State House 24 Beacon Street, Room 419 Boston, MA 02133 Richard.Ross@masenate.gov

In addition, the Norfolk Fire and Police Departments will be notified in situations where public safety is a concern.

#### **4.2 Soliciting Public Input**

Buckley & Mann will provide opportunities for public input regarding Site environmental response actions by holding public comment periods to provide additional opportunities for oral and written input regarding Site decisions, and preparing summaries of all comments received during the public comment period, with responses to comments.

#### **4.2.1 Public Comment Periods**

Buckley & Mann will provide specific opportunities for the public to submit comments about documents concerning the Site. When key documents are available in draft form, they will be provided to the information repositories, and a notice of their availability will be sent to the Site mailing list. The notice will include the title of the document, where it is available for review, information about how to submit comments to Buckley & Mann, and the length of the public comment period. The duration of each comment period will be 20 calendar days. Time-critical elements of an Immediate Response Action Plan may be conducted prior to the close of the public comment period if delaying the remedial actions would exacerbate a release or Site conditions, or would endanger health. Buckley & Mann will be responsible for providing document copies to the information repositories and to the MassDEP site file, as well as sending out notices of availability of any documents it prepares on behalf of Buckley & Mann.

The anticipated documents that will be available for public comment may include the following:

- PIP Plan
- RAM Plans and Completion Statements
- Permanent Solution Statement and supporting documentation, including an AUL

#### **4.2.2 Response to Comments**

Buckley & Mann will prepare a summary of all comments received on each document available for public comment, and provide responses to these comments. A copy of this response summary will be sent to all those who submitted comments, and copies will also be placed in the information repositories and the MassDEP site file. Buckley & Mann will also send a notice of availability of the response summary to the mailing list. The summary will be made available prior to Buckley & Mann moving to the next MCP phase.

#### **4.2.3 Public Meetings**

Buckley & Mann will brief the public about the status of response actions at the Buckley & Mann Site at the following milestones:

- Submittal of Draft RAM Plans and Completion Statements
- Submittal of Draft Phase II, III, and IV reports
- Submittal of Draft Permanent Solution Statements and supporting documentation, such as an AUL.

Meetings will serve two purposes: 1) to provide community officials and the general public with a progress report regarding environmental response actions at the Site, and 2) to provide an opportunity for the public to question and comment on response action plans for the Site.

Buckley & Mann will publish a public notice in the Attleboro *Sun-Chronicle* at least 14 days in advance of a public meeting and send notices announcing public meetings to individuals on the Site mailing list. Buckley & Mann will prepare meeting summaries, submit the summaries to MassDEP, and place a copy of the summaries in the local information repository.

## **5.0 SCHEDULE FOR PUBLIC INVOLVEMENT ACTIVITIES**

Exhibit III provides a schedule of the public involvement activities listed in Section 4.0. The schedule specifies the milestones during the response actions when public involvement activities will be conducted.

## 6.0 RESPONSIBILITY FOR IMPLEMENTING THE PUBLIC INVOLVEMENT PLAN

Buckley & Mann has developed this PIP and is responsible for carrying out the activities listed in this PIP during environmental response actions at the Site. To ensure that Public Involvement Plans are implemented properly, MassDEP has established the appeal process described in the Interim Guidance for handling disputes about public involvement activities. The appeal process is initiated when ten or more residents of the community in which the Site is located or of a community potentially affected by the Site submit a signed petition to Buckley & Mann and to MassDEP stating that Buckley & Mann is not implementing activities agreed upon in the Final PIP. The petition must provide specific information documenting Buckley & Mann's failure to implement specific sections of the PIP.

Upon receipt of the appeal petition, Buckley & Mann must provide written confirmation of receipt to the petitioners and provide a copy of the petition to MassDEP. Buckley & Mann then has 20 calendar days to work with the petitioners to address their concerns. Within this 20-day period, Buckley & Mann must respond to the petition in writing, describing how each issue identified by the petition will be addressed. Any resulting changes in public involvement activities must be incorporated into the PIP. A 20-day public comment period must then be held on the revised PIP, in accordance with Section 7.0 of this PIP. Any revisions to the PIP or specific responses to the appeal petition must be provided to MassDEP.

If Buckley & Mann and the petitioners cannot resolve the petitioners' concerns within 20 calendar days, the petitioners must each submit written information to MassDEP documenting their concerns, actions taken to date to resolve the issues, and their inability to resolve the issues independently of MassDEP. When MassDEP receives this information, it will take the following actions:

1. Review the information packages to assess specific petitioner complaints, identify other community concerns, and determine what public involvement activities, as specified in the PIP, have and have not been conducted. MassDEP may inspect local information repositories, review notification letters, and contact members of the Notification List.
2. Determine whether Buckley & Mann has made any efforts to address community issues. This may include a review of meeting summaries, correspondence or other formal attempts to resolve community concerns about insufficiencies in public involvement activities. If, based upon review of the appeal petition, MassDEP determines that the PIP is not being implemented, MassDEP may take one or more of the following actions:
  - a. Require Buckley & Mann to hire a public involvement consultant specifically to perform activities contained in the final PIP.
  - b. Conduct an audit of the Site to determine whether Buckley & Mann is conducting the response action in compliance with the MCP and/or the final PIP.



## **7.0 REVISIONS TO THIS PLAN**

This PIP may be revised as necessary during the course of the environmental response action process. If revisions are proposed, Buckley & Mann will place copies of any proposed changes in the local information repositories, and will send a notice of the availability of recommended changes to the mailing list. Buckley & Mann will hold a 20-day public comment period (see Section 4.2.1 above) on the proposed revised PIP. Buckley & Mann will review any comments received and revise the PIP as appropriate. The final revised PIP will be placed in the information repositories.

## **EXHIBIT I**

### **Community Concerns About the Buckley & Mann Disposal Site**

## EXHIBIT I

### SUMMARY OF COMMUNITY CONCERNS ABOUT THE FORMER BUCKLEY & MANN DISPOSAL SITE

Eight emails were received in response to the July 3, 2018 survey letter soliciting community concerns about the Buckley & Mann Site. One of these emails was a duplicate message delivered to correct the date on an attached memorandum, therefore seven unique responses were received. The following is a summary of the community concerns expressed in these seven responses:

#### **A. Concerns about the nature and extent of contamination:**

Petitioners are well informed of the historical use of the site and the historical waste disposal practices. Several petitioners are concerned that the nature and extent of contamination has not been adequately delineated, specifically the vertical extent of contamination in the Area #10 consolidation area and beneath the lagoons. Several petitioners expressed a concern that the potential impacts to groundwater and surface waters adjacent to the site (Mill River and Bush Pond) have not been adequately delineated. One petitioner expressed concern that groundwater contamination has migrated into bedrock, potentially impacting private and public water supply wells in the area.

#### **B. Concerns about routes of exposure and neighborhood health issues:**

Most petitioners expressed concern regarding the potential migration of site-related contamination into groundwater, and the potential impacts this might have on drinking water wells. Three petitioners expressed concern that contamination from the site could be the source of health problems in the adjacent neighborhoods, and requested information on the health risks associated with exposure to the type of contaminants present. One petitioner suggested the establishment of a buffer zone between the site and adjacent properties to provide additional protection against the exposure to contaminants by neighborhood residents.

#### **C. Concerns about the site remediation process**

One petitioner provided extensive comments regarding the adequacy of previous site investigation and remediation activities. Some of the specific concerns expressed in this memo included:

- Delineation of the vertical extent of contamination in Area #10
- Discussion of the depth to groundwater in Area #10
- Lack of a vertical barrier beneath consolidated waste in Area #10 to limit contaminant migration
- Insufficient sampling of environmental media for the presence of polychlorinated biphenyls (PCBs)
- Lack of soil samples to demonstrate the removal of contaminants during excavation activities
- Insufficient groundwater characterization
- Lack of surface water and sediment sampling from the Tail Race or Mill River
- Adequacy of the Release Abatement Measure
- Inadequate characterization of human health and environmental risks
- Inappropriate use of an Activity and Use Limitation (AUL)

Several petitioners expressed concern that the previous environmental response actions at the site were not adequately protective of human health and the environment, and requested more aggressive cleanup measures.

#### **D. Concerns about opportunities for public involvement during the remedial response action process**

One petitioner requested that an on-line repository for information be created in addition to the repositories to be established at the Norfolk and Franklin Public Libraries. Two petitioners made mention of the concerns expressed during a previous PIP that was established in the early 2000s, and requested that the concerns from that PIP be addressed.

**E. Other Concerns**

Several petitioners expressed a concern about truck traffic in the neighborhood during construction of the proposed residential development. One petitioner expressed a concern over the impact of site contamination on property values in the neighborhood. One petitioner expressed concern that proper insurance coverage has not been obtained to undertake the proposed redevelopment project.

## **EXHIBIT II**

### **Public Involvement Plan Mailing List**

**EXHIBIT II**  
**PUBLIC INVOLVEMENT PLAN MAILING LIST**

<b>Last</b>	<b>First</b>	<b>Street Address</b>	<b>City</b>	<b>State</b>	<b>ZIP</b>	<b>Petitioner</b>
Bedard	Margaret	28 Lawrence Street	Norfolk	MA	02056	X
Charell	Amy	18 Bretts Farm Road	Norfolk	MA	02056	X
Citarell	Paul	18 Bretts Farm Road	Norfolk	MA	02056	X
Collins	Dorothea	51 Lawrence Street	Norfolk	MA	02056	X
Diamond	Eric	340 Main Street	Norfolk	MA	02056	X
Diamond	Rachel	340 Main Street	Norfolk	MA	02056	X
Dimond	David	3 Bretts Farm Road	Norfolk	MA	02056	X
Dimond	Lynne	3 Bretts Farm Road	Norfolk	MA	02056	X
DiPlacido, Jr	Tom	200 Stonewall Blvd, Suite 4	Wrentham	MA	02093	
Dunne	Andrew	9 Bretts Farm Road	Norfolk	MA	02056	X
Engeman	Patrick	51 Lawrence Street	Norfolk	MA	02056	X
Gilbert	Tom	Town Hall, Room 105C One Liberty Lane	Norfolk	MA	02056	
Gillis	Keri	7 Eagle Drive	Norfolk	MA	02056	X
Greenland	Dawson	7 Bretts Farm Road	Norfolk	MA	02056	X
Gross	William	21 Essex Street	Norfolk	MA	02056	X
Gulla	Kelly	5 Bretts Farm Road	Norfolk	MA	02056	X
Gulla	Peter	5 Bretts Farm Road	Norfolk	MA	02056	X
Hathaway	Jack	Town Hall, Room 205 One Liberty Lane	Norfolk	MA	02056	
Holmes	David	106 Mill Street	Norfolk	MA	02056	X
Holmes	Debra	106 Mill Street	Franklin	MA	02038	X
Kahaly	Brian	11 Cranberry Meadow Road	Norfolk	MA	02056	X
Kahaly	Margaret	11 Cranberry Meadow Road	Norfolk	MA	02056	X
Laughton	Joe	MassDEP Central Region 8 New Bond Street	Worcester		01606	
Lehan	Jim	Town Hall, Second Floor One Liberty Lane	Norfolk	MA	02056	
Mann	Lois	205 Linden Ponds Way	Hingham	MA	02043	
Markham	Stephanie	22 Lawrence Street	Norfolk	MA	02056	X



<b>Last</b>	<b>First</b>	<b>Street Address</b>	<b>City</b>	<b>State</b>	<b>ZIP</b>	<b>Petitioner</b>
Mastro	David	26 Lawrence Street	Norfolk	MA	02056	X
McCabe	Karen	26 Lawrence Street	Norfolk	MA	02056	X
McQuillan	Rosey	11 Bush Pond Road	Norfolk	MA	02056	X
Middleton	Antonia	6 Bretts Farm Road	Norfolk	MA	02056	X
Middleton	Cam	6 Bretts Farm Road	Norfolk	MA	02056	X
Middleton	Gary	6 Bretts Farm Road	Norfolk	MA	02056	X
Middleton	Mark	6 Bretts Farm Road	Norfolk	MA	02056	X
Myatt	Angeli	8 Eric Road	Norfolk	MA	02056	X
Myatt	Leonard	8 Eric Road	Norfolk	MA	02056	X
Myatt	Sandra	8 Eric Road	Norfolk	MA	02056	X
Rayner	Susan	9 Bush Pond Road	Norfolk	MA	02056	X
Ricci	Amy	17 Bretts Farm Road	Norfolk	MA	02056	X
Ricci	Kevin	17 Bretts Farm Road	Norfolk	MA	02056	X
Ricciardi	Frank	Weston & Sampson 5 Centennial Drive	Peabody	MA	01960	
Shapiro	Nancy	20 Bretts Farm Road	Norfolk	MA	02056	X
Tierney	Fred	11 Camden Way	Norfolk	MA	02056	X
Vaughan	Leslie	120 Mill Street	Franklin	MA	02038	X
Vaughan	Meredith	120 Mill Street	Norfolk	MA	02056	X
Wagner	Arthur	67 Park Street	Norfolk	MA	02056	X
Wagner	Christopher	88 Mill Street	Hopedale	MA	01747	X
Wagner	Nicole	21 Essex Street	Norfolk	MA	02056	X
Wakely	Elizabeth	22 Bretts Farm Road	Norfolk	MA	02056	X
Wakely	Jeff	22 Bretts Farm Road	Norfolk	MA	02056	X
Wider	Christopher	Town Hall, Room 105C One Liberty Lane	Norfolk	MA	02056	

## **EXHIBIT III**

### **Schedule of Public Involvement Activities**

**EXHIBIT III**  
**SCHEDULE FOR PUBLIC INVOLVEMENT ACTIVITIES**

<b>Milestone</b>	<b>Schedule</b>
Draft Public Involvement Plan (PIP)	August 7, 2018
Public Comment Period for Draft PIP	August 7, 2018 to August 27, 2018
Final PIP	September 26, 2018
Subsequent MCP Submittals (Draft)	
Public Notice	14 days before public meeting
Public Meeting	same day as submittal of draft report
Public Comment Period	20 days after public meeting/draft report
Response to Comments	Within 60 days after close of public comment period
Final Submittal	Within 30 days after submitting response to comments