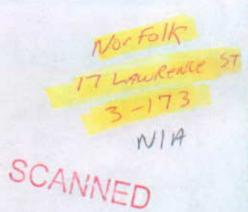
Buckley & Mann, Inc. 14 Bush Pond Road Norfolk, MA 02056

September 18, 2000



Department of Environmental Protection Northeast Regional Office 205A Lowell Street Wilmington, MA 01887

Steple F. L.

Enclosed please find a semi-annual Status Report for the Release Abatement Measure at the Buckley & Mann property at 17 Lawrence Street, Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173.

If you have any questions, please contact me at (781) 828-0029 X3427, or (508) 528-4296.

Sincerely,

Stephen L. Mann

Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

LM

Release Tracking Number

3 173

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

A. SITE LOCATION:	
Site Name: Buckley and Mann, Inc. (optional)	-
Street 17 Lawrence Street	Location Aid: Bush Pond
City/Town: Norfolk	ZIP 02056-0000
Check here if a Tier Classification Submittal has been provided to DEP for Number.	Code: this Release Tracking
Related Release Tracking Numbers That This RAM or URAM Addresses:	
B. THIS FORM IS BEING USED TO: (check all that apply)	
Submit a RAM Plan (complete Sections A, B, C, D, E, F, J, K, L and M).	
Check here if this RAM Plan is an update or modification of a previous Plan.	sly approved written RAM Date Submitted:
Submit a RAM Status Report (complete Sections A, B, C, E, J, K, L and N	1).
Submit a RAM Completion Statement (complete Sections A, B, C, D, E, C	G, J, K, L and M).
Confirm or Provide URAM Notification (complete Sections A, B, H, K, L at	nd M).
Submit a URAM Status Report (complete Sections A, B, C, E, J, K, L and	M).
Submit a URAM Completion Statement (complete Sections A, B, C, D, E	, I, J, K, L and M).
You must attach all supporting documentation required for any Legal Notices and Notices to Public Office	
C. SITE CONDITIONS:	
Check here if the source of the Release or Threat of Release is known.	
If yes, check all sources that apply: UST Pipe/Hose/Line	AST Drums Transformer Boat
Tanker Truck Vehicle Other Specify: Bldg deb	ris, coal ash, and textile plant waste
Identify Media and Receptors Affected: (check all that Air Gro	oundwater Surface Water Sediments V Soi
apply) Wetlands Storm Drain Paved Private	
Schoo Unknown Other Specify:	
Identify Release and/or Threat of Release Conditions at Site: (check all that	apply)
2 and 72 Hour Reporting Condition(s) 120 Day Reporting	a Condition(s) Other Condition(s)
Describe Metals, PAH, and TPH from building deb	
	TO BE SEED OF THE
RAMs may be conducted concurrently with an IR	A only with written DE approval
URAMs may not be conducted if any 2 or 72 H	our conditions existing the site.
Identify Oils and Hazardous Materials Released: (check all that apply)	Oils Children and Solve has Solve ha
Others Specify: PAH and TPH	
D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)	Deptember of Abserbant of Configuration
Assessment and/or Monitoring Only	Materials Appearbant or Contaminent
Excavation of Contaminated Soils	☐ TelDETBY Covers of Cape
Re-use, Recycling or Treatment	Bioremed MOBURN, MASS.
On Site Off Site Est. Vol.:cubic	yards Soil Vapor MASS.
Describe:	Structure Venting System
Store On Site Off Site Est. Vol.: cubic	yards Product or NAPL Recovery
SECTION D IS CONTINUED O	and the same of th

D E, P

Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

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RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking Number

3

D. DESCRIPTION OF RESPONSE ACTIONS (continued):	
✓ Landfill O. Cover O Disposal Est. Vol.: 3.15 cubic yard	Groundwater Treatment Systems
Removal of Drums, Tanks or Containers	Air Sparging
Describe	Temporary Water Supplies
Removal of Other Contaminated Media	Temporary Evacuation or Relocation of Residents
Specify Type and Volume:	Fencing and Sign Posting
Other Response Actions Describe On-site consolidation an	d covering of 4,550 cy soil
See 310 CMR 40.0442 for limitations on the See 310 CMR 40.0464 for performance	scope and type of RAMs. standards for URAMs.
Check here if this RAM or URAM involves the use of Innovative Technologies. creating an Innovative Technologies Clearinghouse.	DEP is interested in using this information to aid in
Describe Technologies:	
E. TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste has b questions)	een sent to an off-site facility, answer the following
Name of Chemical Waste Management - Turnkey Faci Facility:	lity
Town and Rochester, NH	
State: Quantity of Remediation Waste Transported to 315 Tons (no change	from previous semi-annual Status Rpt)
Date: F. RAM PLAN:	
Check here if this RAM Plan received previous oral approval from DEP as a control of this RAM Plan received previous oral approval from DEP as a control of the control of	ontinuation of a Limited Removal Action (LRA).
Date of Oral	
Approval: If a RAM Compliance Fee is required, check here to certify that the fee has be	en submitted. You MUST attach a photocopy of the
payment. See 310 CMR 40.0444(2) to learn when a fee is not required.	
Check here if the RAM Plan is proposed for a Transition Site. If this is the cas prior to undertaking the RAM, if not previously provided. See 310 CMR 40.06	se, you may need to attach an LSP Evaluation Opinion 00 for further information about Transition Sites.
G. RAM COMPLETION STATEMENT:	
If a RAM Compliance Fee is required in connection with submission of the RA been submitted. You MUST attach a photocopy of the payment. You owe this received oral approval of a RAM that continued an LRA, and have NOT previous	fee when submitting a RAM Completion Statement if you
If any Remediation Waste will be stored, treated, managed, recycled or reus Statement, you must submit a Phase IV Remedy Implementation Plan, along v RAM Completion State	with the appropriate transmittal form, as an attachment to the
H. URAM NOTIFICATION:	
Identify Location Type: (check all that Public Right of Way	Utility Easement Private Property
apply) Identify Utility Type: (check all that apply) Sanitary/Combined Sewerage	Water Drainag Natural Gas
	ctric Other Specify
	ate of Oral
Check here if the property owner was NOT contacted prior to initiation of the why the owner was not contacted, including the date and time when contact ut Check here if this URAM will occur in connection with the construction of new and extent of encountered contamination, the scope and expense of necessar alternatives.	Itimately occurred. public utilities. If this is the case, document the nature
With the exception stated below, the person undertaking the URAM must provide t in connection with the URAM:	he name and license number of an LSP engaged or employed
LSP Name:	LSP License Number:
LSP information is not required if the URAM is limited to the excavation and/o	r handling of not more than 100 cubic yards of soil



Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Rele Num	ase ber	Tracking
3	-[173

LIDAM COMDI ETION STATEMENT.	
. URAM COMPLETION STATEMENT: Check here if this URAM was limited to the excavation and/or handling of no	ot more than 100 cubic yards of soil contaminated by Oil or not
more than 20 cubic yards of soil contaminated by either a Hazardous Materi	al or a mixture of a Hazardous Material and Oil.
If any Remediation Waste will be stored, treated, managed, recycled or reu Statement, you must submit either a Release Abatement Measure (RAM) P appropriate transmittal form, as an attachment to	lan or a Phase IV Remedy Implementation Plan, along with the
J. LSP OPINION:	
I attest under the pains and penalties of perjury that I have personally examined documents accompanying this submittal. In my professional opinion and judgme CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the knowledge, information and belief,	nt based upon application of (i) the standard of care in 309
if Section B of this form indicates that a Release Abatement Measure Plan is this submittal (i) has (have) been developed in accordance with the applicable pr appropriate and reasonable to accomplish the purposes of such response action CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, pen	ovisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) (s) as set forth in the applicable provisions of M.G.L. c. 21E and 310
if Section B of this form indicates that a Release Abatement Measure Status being submitted, the response action(s) that is (are) the subject of this submittal provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and re set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and and approvals identified in this submittal;	(i) is (are) being implemented in accordance with the applicable easonable to accomplish the purposes of such response action(s) as
> if Section B of this form indicates that a Release Abatement Measure Completion Statement is being submitted, the response action(s) that is (are) the implemented in accordance with the applicable provisions of M.G.L. c. 21E and accomplish the purposes of such response action(s) as set forth in the applicable complies(y) with the identified provisions of all orders, permits, and approvals identified provisions of all orders.	ne subject of this submittal (i) has (have) been developed and B10 CMR 40.0000, (ii) is (are) appropriate and reasonable to be provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii)
I am aware that significant penalties may result, including, but not limited to, pos to be false, inaccurate or materially incomplete.	sible fines and imprisonment, if I submit information which I know
Check here if the Response Action(s) on which this opinion is based, if any issued by DEP or EPA. If the box is checked, you MUST attach a statement	nt identifying the applicable provisions thereof.
LSP <u>William R. Swanson</u> LSP#: 6406 Name:	Stamp: WILLIAM R. SWANSON
Telephone 617-452-6274 Ext.: 8458	WILLIAM TENTE
FAX: 617-452-8274	B R. R. NORNAWA
(optional)	No. 6406 2
Signature:	No. 6406 A STEPROFESTOR
Date: 9/14/07	SITE PROVIDE
An LSP Opinion is not required for a Utility-Rela	The second secon
An LSP Opinion is not required for a URAM Completion Statement if the UR 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic a mixture of Hazardous N	vards of soil contaminated either by Hazardous Material or
K. PERSON UNDERTAKING RAM OR URAM:	
Name of Buckley and Mann Inc.	
Organization: Name of Richard Mann/ Stephen Mann Contact:	Title: Owners
Street: 15 Bush Pond Lane	-
City/Town: Norfolk	State MA ZIP Code: 02056-0000
Telephone: 781-828-0029 Ext.: 3442	FAX: (optional)
Check here if there has been a change in person undertaking the RAM or	
	28

D E. P

Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 173

RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or	r URAM: (check one)
RP or PRP Specify • Owner O Operator O Generator O	Transporter Other RP or PRP:
Fiduciary, Secured Lender or Municipality with Exempt Status (as define	ed by M.G.L. c. 21E, s. 2)
Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E,	s. 5(j))
Any Other Person Undertaking RAM or URAM Specify Relationship:	A CANADA
I. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM	
attest under the am familiar with the information contained in this submittal, including any and my inquiry of those individuals immediately responsible for obtaining the information for my knowledge and belief, true, accurate and complete, and (iii) that I segally responsible for this submittal. If the person or entity on whose behalf the including, but not limited to, possible fines and imprisonment, for willfully submitted.	am fully authorized to make this attestation on behalf of the entity this submittal is made am/is aware that there are significant penalties.
Stro D	The total and
(signature)	little:
(signature) For Buckley and Mann Inc.	
(print name of person or entity recorded in Section K)	, ,
Enter address of person providing certification, if different from address recor K:	rded in Section
Street: N/A	_
City/Town:	State ZIP Code:
Telephone: Ext	FAX: (optional)

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC. CAMBRIDGE, MASSACHUSETTS

September 2000

Robert A. Dangel Licensed Site Professional # 7798 William R. Swanson Licensed Site Professional # 6406

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

1. Previous filing

The original RAM Plan was filed on May 28, 1996, and the revised RAM plan was filed in December 1997. The previous RAM Status report was filed in March 2000.

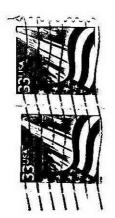
2. Work since the last report

None. Sampling and analysis work at the former dyehouse wastewater treatment impoundments must wait until the groundwater table drops, in late summer 2000. (See below.)

3. Work planned

The following tasks remain to complete the work in 2000:

- Obtain a Certificate of Compliance from the Norfolk Conservation Commission for work subject to the Order of Conditions for the consolidation area cover. Per the Conservation Commission's request, the Activity and Use under the MCP will be completed before the Commission will issue a Certificate.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.
- Sample soils from the bottom of former dyehouse wastewater treatment impoundments for PAH compounds, and determine the closure requirements (if any) for the impoundments.
 - The ground water has dropped low enough in late summer to allow sampling, which should be completed by the end of September 2000.





Department of Environmental Protection Northeast Regional Office 205A Lowell Street Wilmington, MA 01887

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Buckley & Mann, Inc. 14 Bush Pond Road Norfolk, MA 02056

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Buckley & Mann, Inc. 14 Bush Pond Road Norfolk, MA 02056 December 8, 1999 NORFOLK
17 LAWRENCE ST
SCANNED-0173

Department of Environmental Protection Northeast Regional Office 205 Lowell Street Wilmington, MA 01887

Enclosed please find a Tier II Extension request for the Buckley & Mann property in Norfolk, Massachusetts. The site is Bureau of Waste Cleanup #3-0173.

If you have any questions, please contact Richard Mann at (781) 828-0029 X3442, or Stephen Mann at (781) 828-0029 X3427.

Stephen L. Mann, Treasurer

Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

BWSC-107A

			1/I
Rele	ease T	racking Num	ber
3] - [173	

A. DISPOSAL SITE LOCATION:					
Disposal Site Name: Buckley & Mann, Inc					
Street: 17 Lawrence Street	Street: 17 Lawrence Street Location Aid: Bush Pond				
City/Town: Norfalk, MA	ZIP Code: <u>02056-0000</u>				
Related Release Tracking Numbers That This Submittal Will Addres	3:				
B. THIS FORM IS BEING USED TO: (check all that apply)					
Submit a new or revised Tier Classification Submittal for a T (complete Sections A, B, C, I, J, K and L).					
Submit a new or revised Tier Classification Submittal for a T (complete Sections A, B, C, F, G, I, J, K and L).	ier II Site, including a Numerical Ranking Scoresheet				
Submit a Notice that an additional Release Tracking Number required at this time (complete Sections A, B, J, K and L). If this Transmittal Form (BWSC-109).	er(s) is (are) being linked to this Tier Classified Site and rescoring is not submittal is for a Tier I Site, you must also submit a Minor Permit Modification				
List Additional Release Tracking Number(s):	y y				
Submit a Phase I Completion Statement supporting a Tier	Classification Submittal (complete Sections A.B. (Jane)				
Submit a Tier II Extension Submittal for Response Actions at	a Tier II Site (complete Sections A, B, D, F, G), Kand D				
Submit a Tier II Extension Submittal for Response Actions (complete Sections A, B, D, F, J, K and L, and also complete S	taken after expiration of a Walver, pursuan to \$10 CMP 40.0630(4) ections G and I or Section H).*				
Submit a Tier II Transfer Submittal for a change in person(s) (complete Sections A, B, E, F, G, I, J, K, L, M, N and O).	undertaking Response Actions at a Tier II Site DEP/NORTHEAST REGION WOBURN, MASS.				
Submit a Tier II Transfer Submittal for a change in person(310 CMR 40.0630(6) (complete Sections A, B, E, F, J, K, L, M,	s) undertaking Response Actions at a Waiver Site, pursuant to				
You must attach all supporting doc	umentation required for each use of form indicated, d Notices to Public Officials required by 310 CMR 40.1400.				
*NOTE: The Walver expires on the effective date of this	submittal and all further Response Actions must be taken as a Tier II Site.				
C. TIER CLASSIFICATION SUBMITTAL:					
Numerical Ranking Score for Disposal Site: (from Numerical Rankin	g Scoresheet)				
Proposed Tier Classification of Disposal Site: (check one)	Tier IA Tier IB Tier IC Tier II				
Check which, if any, of the Tier I inclusionary criteria are met by the	Disposal Site, pursuant to 310 CMR 40.0520:				
	tion Area or a Zone II, and there is evidence of groundwater contamination by an at concentrations equal to or exceeding the applicable RCGW-1 Reportable				
An Imminent Hazard is present at the time of Tier Classif	cation.				
Check here if this Tier Classification revises a previous submit with this submittal. If a Tier I Permit has been issued, you may	tal for this Disposal Site. You must include a revised Numerical Ranking Scoresheet also need to submit a Major Permit Modification Application (BWSC 10).				
If Incorporating additional Release(s) into the Disposal Site, list	Release Tracking Number(s):				
D. TIER II EXTENSION SUBMITTAL REQUIREMENTS:					
State the expiration date of the Tier II Classification or Waiver for the	Disposal Site, whichever is applicable: 02/22/00				
Attach a statement summarizing why a Permanent or Temporary Solution has not been achieved at the Disposal Site. A Tier II Extension is effective for a period of one year beyond the current expiration date of the Tier II Classification or Walver.					
E. TIER II TRANSFER SUBMITTAL REQUIREMENTS:					
State the proposed effective date of the change in person(s) undertail	king Response Actions at the Disposal Site:				
All Response Actions must be completed by the deadline app	ne proposed change in person(s) undertaking the Response Actions. plicable to the person who first filed either a Tier Classification Submittal for the received a Waiver of Approvals.				



Massachusetts Department of Environmental Protection

BWSC-107A

Bureau of Waste Site Cleanup

TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

3	-	173
OC-C/A		

	The state of the s	CONTROL OF THE STATE OF THE STA
3	DISPOSAL SITE COM	MPLIANCE HISTORY SUMMARY:

- If providing either a Tier Classification Submittal for a Tier II Site or a Tier II Extension Submittal for a Walver Site, the person named in Section J must provide a Compliance History.
- > If providing a Tier II Extension Submittal for a Tier II Site, the person named in Section J must update their Compliance History since the

ompliance History for (provide only one nan	ne per history). Buckley & r	dam, inc.	S 1-2000
Check here if there has been no change	e to the Compliance History of the p	erson named above (Extension Submitta	I for a Tier II Site ONLY
st all permits or licenses that have been iss	ued by the Department that are rele	evant to this Disposal Site:	
PROGRAM:	PERMIT NUMBER:	PERMIT CATEGORY:	FACILITY ID:
ir Quality	0	-	
azardous Waste (M.G.L. c. 21C)	0	-	
olid Waste	0		
dustrial Wastewater Management	0		
ater Supply	0		
ater Pollution Control/Surface Water	.0		
ater Pollution Control/Groundwater	0		
ater Pollution Control/Sewer Connection	0	Andrew .	
etland & Waterways	0		***
ist all other Federal, state or local permits,	licenses, certifications, registrations	, variances, or approvals that are relevan	t to this Disposal Site:
ISSUING AUTHORITY OR PROGRAM,	OR DOCUMENTATION TYPE:	IDENTIFICATION NUMBER:	DATE ISSUED:
Inactive site		Administration (I)	
	, 200, 200, 1		

the compliance history of the person named above with the following:

- (1) DEP regulations; and
- (2) other laws for the protection of health, safety, public welfare and the environment administered or enforced by any other government agency.

Such a statement should identify information such as:

- (1) actions relevant to the Disposal Site taken by the Department to enforce its requirements including, but not limited to, a Notice of Noncompliance (NON), Notice of Intent to Assess Civil Administrative Penalty (PAN), Notice of Intent to Take Response Action (NORA), and an administrative enforcement order;
- (2) administrative consent orders;
- (3) judicial consent judgements;
- (4) similar administrative actions taken by other Federal, state or local agencies;
- (5) civil or criminal actions relevant to the Disposal Site brought on behalf of the DEP or other Federal, state, or local agencies; and
- (6) any additional relevant information.

For each action identified, provide the following information:

- (1) name of the issuing authority, type of action, identification number and date issued;
- (2) description of noncompliance cited;
- (3) current status of the matter; and
- (4) final disposition, if any.



Massachusetts Department of Environmental Protection

BWSC-107A

Bureau of Waste Site Cleanup

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TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

		137500130
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G. CERTIFICATION OF ABILITY AND WILLINGNESS:

- > If providing either a Tier II Classification Submittal or a Tier II Extension Submittal, the person who signs this certification MUST be the person named in Section J, or that person's agent.
- > If providing a Tier II Transfer Submittal, the person who signs this certification MUST be the person named in Section M, or that person's agent.

I attest under the pains and penalties of perjury that (i) I/the person(s) or entity(ies) on whose behalf this submittal is made has/have personally examined and am/is familiar with the requirements of M.G.L. c. 21E and 310 CMB 40,0000; (ii) based upon my inquiry of the/those Licensed Site Professional(s) employed or engaged to render Professional Services for the disposal site which is the subject of this Transmittal Form and of the person(s) or entity(ies) on whose behalf this submittal is made, and my/that person's(s') or entity's(les') understanding as to the estimated costs of necessary response actions, that/those person(s) or entity(ies) has/have the technical, financial and legal ability to proceed with response actions for such site in accordance with M.G.L. c. 21E, 310 CMR 40.0000 and other applicable requirements; and (iii) that I am fully authorized to make this attestation on behalf of the person(s) or entity(les) legally responsible for this submittal. I/the person(s) or entity(les) on whose behalf this submittal is made is aware of the requirements in 310 CMR 40.0172 for notifying the Department in the event that I/the person(s) or entity(ies) on whose behalf this submittal is made learn(s) that it/they is/are unable to proceed with the necessary response actions.

Bv:	/(mm), 9/1	Title: President	
The second second	ignature)	and the second s	
	uckley & Mann, Inc.	Date:	
(p	print name of person or entity recorded in Section J or M, as appropriate or person or entity recorded in Section J or M, as appropriate or person or entity recorded in Section J or M, as appropriate or person or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as appropriate or entity recorded in Section J or M, as a section of the section of	opriate)	
	you may choose to sign the alternative At	al for a Waiver Site or a Tier II Transfer Submittal for a Waiver Site, bility and Willingness Certification found in Section H n in Section G and the LSP Opinion in Section I.	and the second
H. AL	TERNATIVE CERTIFICATION OF ABILITY AND WILL	INGNESS:	
that	person's agent	erson who signs this certification MUST be the person named in Section	
	oviding a Tier II Transfer Submittal for a Walver Site, the persperson's agent.	son who signs this certification MUST be the person named in Section N	A, or
examin the disp person technic applica submitt Departi	ned and am/is familiar with the requirements of M.G.L. c. 21E and posal site which is the subject of this Transmittal Form and of the s(s(s') or entity's(ies') understanding as to the estimated costs of real, financial and legal ability to proceed with response actions for the requirements; and (iii) that I am fully authorized to make this stal. I/the person(s) or entity(ies) on whose behalf this submittal is	r entity(ies) on whose behalf this submittal is made has/have personally d 310 CMR 40.0000; (ii) based upon my inquiry of the Consultant-of-Rece person(s) or entity(ies) on whose behalf this submittal is made, and my necessary response actions, that/those person(s) or entity(ies) has/have r such site in accordance with M.G.L. c. 21E, 310 CMR 40.0000 and oth attestation on behalf of the person(s) or entity(ies) legally responsible for s made is aware of the requirements in 310 CMR 40.0172 for notifying the laft this submittal is made learn(s) that it/they is/are unable to proceed with	/that the er this ne
By:	ignature)	Title:	
For:		Date:	
(p	rint name of person or entity recorded in Section J or M, as appro		7270TR 10

I. LSP OPINION:

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 (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

- > if Section B of this form indicates that a Tier I or Tier II Classification Submittal which relies upon a previously submitted Phase I Completion Statement is being submitted, this Tier Classification Submittal has been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;
- > if Section B of this form indicates that a Phase I Completion Statement or a Tier I or Tier II Classification Submittal which does not rely upon a previously submitted Phase I Completion Statement is being submitted, the response action(s) that is (are) the subject of this submitted (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) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

SECTION I IS CONTINUED ON THE NEXT PAGE



(continued)

I. LSP OPINION:

Massachusetts Department of Environmental Protection

BWSC-107A

Bureau of Waste Site Cleanup

TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

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is (are) the subject of this submittal (i) is (are) being implemented in accordance with (ii) is (are) appropriate and reasonable to accomplish the purposes of such response and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders	the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, action(s) as set forth in the applicable provisions of M.G.L. c. 21E
I am aware that significant penalties may result, including, but not limited to, possible be false, inaccurate or materially incomplete.	fines and imprisonment, if I submit information which I know to
Check here if the Response Action(s) on which this opinion is based, if any, are issued by DEP or EPA. If the box is checked, you MUST attach a statement id	entifying the applicable provisions thereof.
LSP Name: William R. Swanson LSP #: 6406	Stamp: Stamp: MASSE
Telephone: 617-252-8000 Ext.: 8458	Stamp: WILLIAM R. SWANSON
FAX: (optional) 617-621-2565	(S (swanson) 3
Signature: With & Moure	on currently undertaking response actions, not transferee)
Date: 12/6/99	SITE PROFE
J. PERSON MAKING SUBMITTAL: (For Transfer Submittals describe pers	on currently undertaking response actions, not transferee)
Name of Organization: Buckley & Mann, Inc.	The state of the s
Name of Contact: Richard Mann/ Stephen Mann	Title: Owners
Street: 14 Bush Pond Lane	
City/Town: Norfolk	State: MA ZIP Code: 02056-0000
Telephone: 781-821-0029 Ext.: 3442	FAX: (optional)
K. RELATIONSHIP TO DISPOSAL SITE OF PERSON MAKING SUBMI	TTAL: (check one)
RP or PRP Specify: • Owner O Operator O Generator Tr	ansporter Other RP or PRP:
Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M	.G.L. c. 21E, s. 2)
Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
Any Other Person Making Submittal Specify Relationship:	7. 7. 7. 7. 7. 7. 7. 7. 7. 7. 7. 7. 7. 7
L. CERTIFICATION OF PERSON MAKING SUBMITTAL:	
familiar with the information contained in this submittal, including any and all docume of those individuals immediately responsible for obtaining the information, the materic knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized this submittal. I/the person or entity on whose behalf this submittal is made am/is averaged possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete. By:	al information contained in this submittal is, to the best of my to make this attestation on behalf of the entity legally responsible for vare that there are significant penalties, including, but not limited to, ete information.
(signature)	Title: President Date: 12/8/99
For: Buckley & Mann, Inc. (print name of person or entity recorded in Section J)	Date.
Enter address of the person providing certification(s), including Ability and Willingne recorded in Section J:	ess Certification where applicable, if different from address
Straet:	
City/Town:	State: ZIP Code:
Telephone: Ext.:	FAX: (optional)
YOU MUST 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, AND YOU MAY INCUR ADDITIONAL COMPLIANCE FEES.

MCP TIER II EXTENSION REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC. CAMBRIDGE, MASSACHUSETTS

December 6, 1999

Robert A. Dangel Licensed Site Professional # 7798 William R. Swanson Licensed Site Professional # 6406

MCP TIER II EXTENSION REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS

BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

The second year of the Tier II extension for this site expires on February 22, 2000.

This report describes the progress made over the last 12 months and plans to complete remediation at the site.

The following work was completed during the 1999 Tier II extension period:

- Preparation of final drawings and specifications to complete the cover over Area 10
- Solicitation of bids and award of a contract for the cover work
- Completion of the Area 10 work.

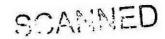
The Area 10 work included:

- Relocation of approximately 50 cubic yards contaminated soil from Area 5 to the Area 10 consolidation area. This material was overlooked in the May and June 1998 remediation work.
- Addition of approximately 2,000 cubic yards additional sand to complete the three foot thick cover over the geotextile, which marks the top of the contaminated soil layer.
- Application of compost, fertilizer, lime and hydroseed to complete the cover.

The following tasks remain to complete the work in 1999:

- Obtain a Certificate of Compliance from the Norfolk Conservation Commission.
- Sample and analyze soil and groundwater from the two former dyehouse wastewater treatment lagoons for PAH compounds. Based on the analytical results, determine what actions, if any, would be needed to reach a Response Action Outcome for the lagoons. This work was not done in 1999 because high groundwater (and consequently high water level in the lagoons) restricted access.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.

Buckley & Mann, Inc. 14 Bush Pond Road Norfolk, MA 02056



September 23, 1999

Department of Environmental Protection Northeast Regional Office 205 Lowell Street Wilmington, MA 01887

Sta a

Enclosed please find a semi-annual Status Report for the Release Abatement Measure at the Buckley & Mann property at 17 Lawrence Street, Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173.

If you have any questions, please contact me at (781) 828-0029 X3427.

Sincerely,

Stephen L. Mann

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC. CAMBRIDGE, MASSACHUSETTS

September 1999

Robert A. Dangel Licensed Site Professional # 7798 William R. Swanson Licensed Site Professional # 6406

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

1. Previous filing

The original RAM Plan was filed on May 28, 1996, and the revised RAM plan was filed in December 1997. The previous RAM Status report was filed in March 1999.

2. Work since the last report

The following tasks were completed over the last six months:

- Specifications and a drawing were prepared for completion of the consolidation area (Area 10) cover. Bids were solicited and a contractor was selected.
- In September 1999, the contractor:
 - removed approximately 50 cubic yards of contaminated soil from Area 5 and placed the material under the consolidation area cover. This material had been overlooked in the May and June 1998 remediation work.
 - added approximately 2,000 cubic yards additional sand and a loam layer to complete the three foot thick cover over the consolidation area, followed by hydroseeding.

3. Work planned

The following tasks remain to complete the work in 1999/2000:

- Obtain a Certificate of Compliance from the Norfolk Conservation Commission for work subject to the Order of Conditions for the consolidation area cover.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.
- Sample soils from the bottom of former dyehouse wastewater treatment impoundments for PAH compounds, and determine the closure requirements (if any) for the impoundments.



Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

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r disdail to 310 Civil 40.0444 - 0440 and 310 Civil	40.0462 - 0465 (Subpart D)
A. SITE LOCATION:	3.00
Site Name: (optional) Buckley and Mann, Inc.	
Street: 17 Lawrence Street	Location Aid: Bush Pond
City/Town: Norfolk, MA	ZIP Code: <u>02056-0000</u>
Check here if a Tier Classification Submittal has been provided to DEP for this R	lelease Tracking Number.
Related Release Tracking Numbers That This RAM or URAM Addresses:	
B. THIS FORM IS BEING USED TO: (check all that apply)	
Submit a RAM Plan (complete Sections A, B, C, D, E, F, J, K, L and M).	
Check here if this RAM Plan is an update or modification of a previously ap	proved written RAM Plan. Date Submitted:
Submit a RAM Status Report (complete Sections A, B, C, E, J, K, L and M).	
Submit a RAM Completion Statement (complete Sections A, B, C, D, E, G, J,	K, L and M).
Confirm or Provide URAM Notification (complete Sections A, B, H, K, L and M)	
Submit a URAM Status Report (complete Sections A, B, C, E, J, K, L and M).	
Submit a URAM Completion Statement (complete Sections A, B, C, D, E, I, J,	
You must attach all supporting documentation required for e any Legal Notices and Notices to Public Officia	ach use of form indicated, including copies of is required by 310 CMR 40.1400.
C. SITE CONDITIONS:	
Check here if the source of the Release or Threat of Release is known.	
If yes, check all sources that apply: UST Pipe/Hose/Line	AST Drums Transformer Boat
Tanker Truck Vehicle Volter Specify: Bldg debri	s, coal ash, and textile plant waste
Identify Media and Receptors Affected: (check all that apply) Air Grour	ndwater Surface Water Sediments V Soil
Wetlands Storm Drain Paved Surface Private We	
School Unknown Other Specify:	
Identify Release and/or Threat of Release Conditions at Site: (check all that apply)	
2 and 72 Hour Reporting Condition(s) 120 Day Reporting C	ondition(s) Other Condition(s)
Describe: Metals, PAH, and TPH from building debr	is, coal ash and textile plant
RAMs may be conducted concurrently with an IRA of URAMs may not be conducted if any 2 or 72 Hour	only with written DEP approval
Identify Oils and Hazardous Materials Released: (check all that apply)	e constitution de la constitutio
Others Specify: PAH and TPH	
D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)	
Assessment and/or Monitoring Only	Deployment of Absorbant or Containment Materials
Excavation of Contaminated Soils	Temporary Covers or Caps
Re-use, Recycling or Treatment	Bioremediation
On Site Off Site Est. Vol.:cubic ya	rds Soil Vapor Extraction
Describe:	Structure Venting System
Store On Site Off Site Est. Vol.: cubic ye	rds Product or NAPL Recovery
SECTION D IS CONTINUED ON	THE NEXT PAGE.



Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

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D. DESCRIPTION OF RESPONSE ACTIONS (continued):	300000000000000000000000000000000000000
✓ Landfill ,	Groundwater Treatment Systems
Removal of Drums, Tanks or Containers	Air Sparging
Describe:	Temporary Water Supplies
Removal of Other Contaminated Media	Temporary Evacuation or Relocation of Residents
Specify Type and Volume:	Fencing and Sign Posting
Other Response Actions Describe: On-site consolidation and c	overing of 4,550 cy soil
See 310 CMR 40.0442 for limitations on the scop See 310 CMR 40.0464 for performance stand	
Check here if this RAM or URAM involves the use of Innovative Technologies. DEP is i Innovative Technologies Clearinghouse.	interested in using this information to aid in creating an
Describe Technologies:	
E. TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste has been se	ent to an off-site facility, answer the following questions)
Name of Facility: Chemical Waste Management - Turnkey Facilit	у
Town and State: Rochester, NH	
Quantity of Remediation Waste Transported to Date: 315 Tons (no change from	om previous semi-annual Status Rpt)
F. RAM PLAN:	
Check here if this RAM Plan received previous oral approval from DEP as a continuation	on of a Limited Removal Action (LRA).
Date of Oral Approval:	
If a RAM Compliance Fee is required, check here to certify that the fee has been submit See 310 CMR 40.0444(2) to learn when a fee is not required.	itted. You MUST attach a photocopy of the payment.
Check here if the RAM Plan is proposed for a Transition Site. If this is the case, you mundertaking the RAM, if not previously provided. See 310 CMR 40.0600 for further info	nay need to attach an LSP Evaluation Opinion prior to promation about Transition Sites.
G. RAM COMPLETION STATEMENT:	
If a RAM Compliance Fee is required in connection with submission of the RAM Compliance Submitted. You MUST attach a photocopy of the payment. You owe this fee when submapproval of a RAM that continued an LRA, and have NOT previously submitted a RAM	mitting a RAM Completion Statement if you received oral
If any Remediation Waste will be stored, treated, managed, recycled or reused at Statement, you must submit a Phase IV Remedy Implementation Plan, along with the RAM Completion Statement.	ne appropriate transmittal form, as an attachment to the
H. URAM NOTIFICATION:	
Identify Location Type: (check all that apply) Public Right of Way	Utility Easement Private Property
Identity Utility Type: (check all that apply) Sanitary/Combined Sewerage	Water Drainage Natural Gas
Telephone Steam Lines Telecommunications Electric	Other Specify:
Check here if you provided DEP with previous oral notification of this URAM. Date of 0	Oral Notice:
Check here if the property owner was NOT contacted prior to initiation of the URAM. In the owner was not contacted, including the date and time when contact ultimately occur	
Check here if this URAM will occur in connection with the construction of new public ut extent of encountered contamination, the scope and expense of necessary mitigation as	
With the exception stated below, the person undertaking the URAM must provide the name a connection with the URAM:	and license number of an LSP engaged or employed in
LSP Name: LSP	License Number:
LSP information is not required if the URAM is limited to the excavation and/or handling Oil, or not more than 20 cubic yards of soil contaminated either by a Hazardous Materia	



Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking Number

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URAM COMPLETION STATEMENT: Check here if this URAM was finited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of seil contaminated by Oil, or not more than 20 cubic yards of seil contaminated by Oil, or not more than 20 cubic yards of seil contaminated by Oil, or not more than 20 cubic yards of seil contaminated by Oil, or not more than 20 cubic yards of seil contaminated by Oil, or not more than 20 cubic yards of seil contaminated by Oil, or not more than 100 cubic yards of seil contaminated by Oil, or not more than 100 cubic yards of seil contaminated by Oil, or not more than 100 cubic yards of seil contaminated by Oil, or not more than 100 cubic yards of seil contaminated by Oil, or not more than 100 cubic yards of seil contaminated by Oil, or not more than 100 cubic yards of seil contaminated by Oil, or not more than 100 cubic yards of seil contaminated by Oil, or not more than 100 cubic yards of seil contaminated by Oil, or not more than 100 cubic yards of seil contaminated by Oil, or not more than 100 cubic yards of seil yards of yar	1 disdant to 310 Civit 40.0444 - 0440 and 310 Civi	1h 40.0462 - 0465 (Subpart D)
than 20 cubic yards of soil contaminated by either a Hazardous Material or a mixture of a Hazardous Material and Oil. If any Remediation Waste will be stored, treated, managed, recycled or reused at the six following guadination of the URAM Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmitted form, as an artachment to the URAM Completion Statement. LSP OPINION: attest under the pains and penalties of periory that I have personally examined and am familiar with this transmitted form, including any and all documents accompanying this submitted. In my professional opinion and judgment based upon application of 19 the standard of circ in 309 CMR 1.02(1), 61 the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my formwide, microarchine and belief. If Section 8 of this form indicates that a Releases Abatement Measure Plan is being submitted, the response action(s) that is (are) the subject of this unlambed (i) has the investment of a contraction of the submitted (ii) and the investment of the contraction	URAM COMPLETION STATEMENT:	
Statement, you must submit either a Release Absternant Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the URAM Completion Statement. **LSP OPINION:** attest under the pairs and penalties of perjury that I have personally examined and an 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 1.02(1) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge. Information and belief. **If Section B of this form indicates that a Release Absternent Measure Plan is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (fiver) been developed in accordance with the applicable provisions of all officers, permits, and approvais Identified in this submittal. **If Section B of this form indicates that a Release Absternent Measure Status Report or a Utility-Related Absternent Measure Status Report is released by the interest of the subject of this submittal (i) is a response action(s) that is (are) the subject of this submittal (i) is (are) 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 4.0.0000 and (ii) completely) with the identified provisions of all orders, permits, and approvals Identified in the subject of this submittal (i) is a response action(a) as set forth in the in the submittal (i) is a response action and in the submittal (ii) is a response action and a Release Absternent Measure Compellor Statement is a submittal (ii) is a response action of the submittal orders in the submi	Check here if this URAM was limited to the excavation and/or handling of not than 20 cubic yards of soil contaminated by either a Hazardous Material or a	more than 100 cubic yards of soil contaminated by Oil, or not more mixture of a Hazardous Material and Oil.
attost under the pains and penatities of perjury that I have personally examined and am familiar with this transmittal form, including any and all bocuments accompanying this submittal. In my professional opinion and judgment based upon application of () the standard of care in 309 CMR 40,001, (i) of the applicable provisions of 509 CMR 40,02) and (3), and (ii) mp provisions of 309 CMR 40,22), and (3) and (iii) mp provisions of 309 CMR 40,22), and (3) and (iii) mp provisions of 309 CMR 40,22), to the best of my knowledge. Information and belief, If Section 8 of his form indicates that a Release Abstement Measure Plan is being submitted, the response action(a) 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 casconable to accomplish the purposes of such response action(a) as as of form in the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 and (ii) and in the submittal (ii) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 and (ii) cere) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 and (ii) cere) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 and (ii) cere) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 and (ii) cere) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 and (ii) the submittal (ii) has (have) proses of such response action(s) as a set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 and (ii) has subject of this submittal (ii) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 and (iii) completes with a submittal (iii) and applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 and (iii) com	Statement, you must submit either a Release Abatement Measure (RAM)	Plan or a Phase IV Remedy Implementation Plan, along with the
An LSP Opinion is not required from the submittal. It may professional opinion and judgment based upon application of (i) the standard of ear in 309 CMR 1,00(1), (ii) the applicable provisions of 309 CMR 1,00(2) and (iii), here with the proprietable provisions of 309 CMR 1,00(2) and (iii), and (iii) the provisions of MR 1,00(5), to the best of my knowledge, in accordance with the applicable provisions of MR 1,00(2) and (ii) the standard of CMR 40,0000, (iii) is (ara) appropriate and eastonable to accomplish the purposes of such response action(iii) as all forth in the applicable provisions of MR 1,00(2), and (iii) complisity) with the identified provisions of all orders, permits, and approvals identified in this submittal (ii) and septicable provisions of MR 1,00(2), and (iii) complisity) with the identified provisions of all orders, permits, and approvals identified in this submittal (ii) is a facility the response action(iii) and is (are) the submittal (ii) is submittal (ii) is a facility her personse action(iii) as set forth in the applicable provisions of MR 1,00(2), (iii) is (are) appropriate and reasonable to accomplish the purposes of such response action(iii) as set forth in the applicable provisions of MR 1,00(2), (iii) is (are) appropriate and reasonable to accomplish the purposes of such response action(iii) as set forth in the applicable provisions of MR 1,00(2), (iii) is (are) appropriate and reasonable to accomplish the purposes of such response action(iii) as set forth in the applicable provisions of MR 1,00(2), (iii) is (are) appropriate and accordance with the applicable provisions of MR 1,00(2), (iii) is (are) appropriate and a reasonable to accomplish the purpose of such in the applicable provisions of MR 1,00(2), (iii) is (are) appropriate and are assonable to accomplish the purpose of such response action(iii) as a facility in the applicable provisions of MR 1,00(2), (iii) is (are) appropriate and reasonable to accomplish the purpose of such response action(iii) and the applicable provision	. LSP OPINION:	
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 easonable 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 (ii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal; or a set of 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) complies(y) with the identified provisions of all orders, permits, and approvals identified in the submittal (ii) is (are) being submitted. The response action(s) as a few that is a Release Abatement Measure Completion Statement is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordant the splicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 (iii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) that is applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 (iii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as a forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 (iii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as a forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 (iii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as a forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 (iii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) that the applicable provisions of M.G.L. c. 21E and 310 CMR 40,0000 (iii) i	documents accompanying this submittal. In my professional opinion and judgmen 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the prov	nt based upon application of (i) the standard of care in 309 CMR
An LSP Opinion is not required for a Unilly Related Abatement Messure Notification. 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 approvals (substantian). 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 if being is the first part of required for a Unilly Related Abatement Messure Completion Statement or a Utility-Related Abatement Measure Completion Statement is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordar 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) compliesty) with the identified in this submitted; and approvals identified in this submittal; and approvals identified in this submittal provisions of all orders, permitty of the purposes of authority of such approvals identified in this submittal orders, permitty of the purpose of such response action and approval in the purpose of such response action and approval in the purpose of such response action and approval in a purpose of such approvals identified in this submittal information which I know to be also, in account or materially incomplete. An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yard	submittal (i) has (have) been developed in accordance with the applicable provision easonable to accomplish the purposes of such response action(s) as set forth in t	ns of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii)
Statement is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordant the thing submitted of the submittal (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) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal; 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 also, inaccurate or materially incomplete. 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. SP Name: William R. Swanson LSP #: 64.06 Stamp: Telephone: 617-252-80.00 Ext.: R458 WILLIAM An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by 01, or not more than 20 cubic yards of soil contaminated either by Hazardous Material or anixture of Hazardous Material and 01. K. PERSON UNDERTAKING RAM OR URAM: Name of Contact: Richard Mann / Stephen Mann Tic. Name of Contact: Richard Mann / Stephen Mann Title: Owners Street: 14 Bush Pond Lane City/Town: Norfolk State: MA ZIP Code: 02056-0000	being submitted, the response action(s) that is (are) the subject of this submittal (i) M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to ac applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y)	 i) is (are) being implemented in accordance with the applicable provisions of ccomplish the purposes of such response action(s) as set forth in the
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Telephone: 791-828-0029 Ext.: 3442 FAX: (optional)	Dity/Town: Norfolk	State: MA ZIP Code: 02056-0000
Check here if there has been a change in person undertaking the RAM or I IDAM	Telephone: 781-828-0029 Ext.: 3427	FAX: (optional)
The state of the s	Check here if there has been a change in person undertaking the RAM or UF	RAM.

D E P

Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 173

L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or	UDAN. (1.)			
RP or PRP Specify: Owner Operator Officer Other RP or PRP:				
Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)				
Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))				
Any Other Person Undertaking RAM or URAM Specify Relationship:				
M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM	l:			
I,	ized to make this attestation on behalf of the entity legally responsible for is aware that there are significant penalties, including, but not limited to.			
By: Styphent-time	Title: TREASINER			
(signature) For: Buckley and Mann Inc.				
(print name of person or entity recorded in Section K)				
Enter address of person providing certification, if different from address recorde	d in Section K:			
Street: N/A				
City/Town:	State: ZIP Code:			
Telephone: Ext.:	FAX: (optional)			
YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THE INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FARE A REQUIRED	FORM, YOU MAY BE PENALIZED FOR MISSING			
1				

Buckley & Mann, Inc. 14 Bush Pond Road Norfolk, MA 02056

SCANNED

March 20, 2000

Department of Environmental Protection Northeast Regional Office 205 Lowell Street Wilmington, MA 01887

Enclosed please find a semi-annual Status Report for the Release Abatement Measure at the Buckley & Mann property at 17 Lawrence Street, Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173.

If you have any questions, please contact me at (781) 828-0029 X3427.

Sincerely,

Ŧ

Stephen L. Mann



Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

173

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking Number

3 -

A C	CITE I OCATION.	- Committee of the Company of
	SITE LOCATION:	
(optio	e Name: ' <u>Buckley and Mann, Inc.</u> otional)	
Stree:	reet 17 Lawrence Street	Location Aid: Bush Pond
City/	ty/Town: Norfolk	ZIP 02056-0000 Code:
V		
	elated Release Tracking Numbers That This RAM or URAM	***
B. T	THIS FORM IS BEING USED TO: (check all that apply)	
	Submit a RAM Plan (complete Sections A, B, C, D, E, F, J, K, L and M	NO BANK
	Check here if this RAM Plan is an update or modification of a pre Plan.	eviously approved written RAM Date Submitted:
V	Submit a RAM Status Report (complete Sections A, B, C, E, J, K, L a	and M).
	Submit a RAM Completion Statement (complete Sections A, B, C, D	
Ш	Confirm or Provide URAM Notification (complete Sections A, B, H, K	IIII MAD 2 2 2000 IIII
	Submit a URAM Status Report (complete Sections A, B, C, E, J, K, L	Land M).
	Submit a URAM Completion Statement (complete Sections A, B, C, You must attach all supporting documentation require any Legal Notices and Notices to Public	ed for each use of form indicated, including copies of I TASS.
C. 8	SITE CONDITIONS:	
V	Check here if the source of the Release or Threat of Release is known	n.
ראבו	If yes, check all sources that apply: UST Pipe/Hose/Li	
ldon	entify Media and December Affected: /eheal; all that	debris, coal ash, and textile plant waste
appl		Groundwater Surface Water Sediments
	Surace	ivate Well Public Water Supply Zone 2 Residence
	Schoo Unknown Other Specify:	
Iden	entify Release and/or Threat of Release Conditions at Site: (check all	that apply)
	2 and 72 Hour Reporting Condition(s) 120 Day Rep	porting Condition(s) Other Condition(s)
	Describe Metals, PAH, and TPH from building	debris, coal ash and textile plant
		E and any comment
	RAMs may be conducted concurrently with a URAMs may not be conducted if any 2 or	an IRA only with written DEP approval 72 Hour conditions exist at the site.
Iden	entify Oils and Hazardous Materials Released: (check all that	Oils Chlorinated Heavy Metals
appl	oply) Others Specify: PAH and TPH	Solvents V Heavy Wetals
D. I	DESCRIPTION OF RESPONSE ACTIONS: (check all that	
	apply) Assessment and/or Monitoring Only	Deployment of Absorbant or Containment Materials
V	Excavation of Contaminated Soils	Temporary Covers or Caps
	Re-use, Recycling or Treatment	Bioremediation
	On Site Off Site Est. Vol.;	cubic yards Soil Vapor Extraction
	Describe:	Structure Venting System
	Store On Site Off Site Est. Vol.:	□ Recovery
	SECTION D IS CONTINU	JED ON THE NEXT PAGE.

D. E. P

Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 173

DESCRIPTION OF RESPONSE ACTIONS (continued): Landfill Ocover Disposal Est. Vol.: 315 cubic yards	Groundwater Treatment
	☐ Systems ☐ Air Sparging
Removal of Drums, Tanks or Containers Describe	
	Temporary Water Supplies Temporary Evacuation or Relocation of
Removal of Other Contaminated Media	Residents
Specify Type andVolume:	Fencing and Sign Posting
Other Response Actions Describe On-site consolidation and o	covering of 4,550 cy soil
See 310 CMR 40.0442 for limitations on the sco See 310 CMR 40.0464 for performance star	ope and type of RAMs. ndards for URAMs.
Check here if this RAM or URAM involves the use of Innovative Technologies. DE creating an Innovative Technologies Clearinghouse.	P is interested in using this information to aid in
Describe	
TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste has been questions)	sent to an off-site facility, answer the following
ame of <u>Chemical Waste Management- Turnkey Facilit</u> acility:	<u>-</u>
own and Rochester, NH	
	com previous semi-annual Status Rpt)
ate: RAM PLAN:	
Check here if this RAM Plan received previous oral approval from DEP as a contin	usation of a Limited Removal Action (LRA)
Date of Oral	addition of a climited from the first strength (21 or y.
Approval:	
If a RAM Compliance Fee is required, check here to certify that the fee has been s payment. See 310 CMR 40.0444(2) to learn when a fee is not required.	submitted. You MUST attach a photocopy of the
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Check here if the RAM Plan is proposed for a Transition Site. If this is the case, y prior to undertaking the RAM, if not previously provided. See 310 CMR 40.0600 for RAM COMPLETION STATEMENT: If a RAM Compliance Fee is required in connection with submission of the RAM C been submitted. You MUST attach a photocopy of the payment. You owe this fee received oral approval of a RAM that continued an LRA, and have NOT previously if any Remediation Waste will be stored, treated, managed, recycled or reused a tatement, you must submit a Phase IV Remedy Implementation Plan, along with RAM Completion Statemer I. URAM NOTIFICATION: Identify Location Type: (check all that Public Right of Way Imply) In the property owner was not contacted prior to initiation of the URAM. Check here if the property owner was NOT contacted prior to initiation of the URAM with the owner was not contacted, including the date and time when contact ultimated the construction of new public and extent of encountered contamination, the scope and expense of necessary management of the case, yet prior to initiation of the public Right of the construction of new public Right of the construction of the URAM with the owner was not contacted, including the date and time when contact ultimated the public Right of the construction of new public Right of the case, yet prior to initiation of the URAM with occur in connection with the construction of new public Right of the case, yet prior to initiation of the URAM with occur in connection with the construction of new public Right of the case, yet prior to initiation of the URAM with the construction of new public Right of the case and the prior to initiation of the unit received the prior to initiation of the unit received the prior to initiation of the unit received the prior to initiation of the unit rece	ou may need to attach an LSP Evaluation Opinion or further information about Transition Sites. ompletion Statement, check here to certify that the fee has when submitting a RAM Completion Statement if you submitted a RAM Plan and accompanying fee. In the site following submission of the RAM Completion the appropriate transmittal form, as an attachment to the theorem. Utility Easement Private Property Drainag Natural Gas Other Specify f Oral AM. If this is the case, you must attach an explanation of ately occurred. Slic utilities. If this is the case, document the nature intigation and the benefits amd limitations of project
Check here if the RAM Plan is proposed for a Transition Site. If this is the case, y prior to undertaking the RAM, if not previously provided. See 310 CMR 40.0600 for RAM COMPLETION STATEMENT: If a RAM Compliance Fee is required in connection with submission of the RAM C been submitted. You MUST attach a photocopy of the payment. You owe this fee received oral approval of a RAM that continued an LRA, and have NOT previously If any Remediation Waste will be stored, treated, managed, recycled or reused attatement, you must submit a Phase IV Remedy Implementation Plan, along with RAM Completion Statemer I. URAM NOTIFICATION: dentify Location Type: (check all that Public Right of Way Imply) dentify Utility Type: (check all that Sanitary/Combined Sewerage Telephone Steam Lines Telecommunications Electric Check here if the property owner was NOT contacted prior to initiation of the URAM. Check here if the property owner was NOT contacted prior to initiation of the URAM. Check here if this URAM will occur in connection with the construction of new pub and extent of encountered contamination, the scope and expense of necessary malternatives. With the exception stated below, the person undertaking the URAM must provide the not connection with the URAM: LSP Name:	ou may need to attach an LSP Evaluation Opinion or further information about Transition Sites. ompletion Statement, check here to certify that the fee has when submitting a RAM Completion Statement if you submitted a RAM Plan and accompanying fee. In the site following submission of the RAM Completion the appropriate transmittal form, as an attachment to the site following submission of the RAM Completion the appropriate transmittal form, as an attachment to the site following submission of the RAM Completion the appropriate transmittal form, as an attachment to the site of



Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number		
3	-	173

DEP	and the second s		2 - 172
	Pursuant to 310 CMR 40.0444 - 0446 and 310 CM	R 40.0462 - 0465 (Subpart D)	3 - 173
I. URAM COMPLE	ETION STATEMENT:		
	this URAM was limited to the excavation and/or handling of cubic yards of soil contaminated by either a Hazardous Mate		
	on Waste will be stored, treated, managed, recycled or re nust submit either a Release Abatement Measure (RAM) appropriate transmittal form, as an attachment	Plan or a Phase IV Remedy Implemer	ntation Plan, along with the
J. LSP OPINION	:		
documents accomp	ains and penalties of perjury that I have personally examine banying this submittal. In my professional opinion and judgme applicable provisions of 309 CMR 4.02(2) and (3), and (iii) ation and belief,	ent based upon application of (i) the sta	andard of care in 309
this submittal (i) has appropriate and rea	is form indicates that a Release Abatement Measure Plans (have) been developed in accordance with the applicable pasonable to accomplish the purposes of such response action (iii) complies(y) with the identified provisions of all orders, pe	provisions of M.G.L. c. 21E and 310 CM n(s) as set forth in the applicable provis	R 40.0000, (ii) is (are) ions of M.G.L. c. 21E and 310
being submitted, the provisions of M.G.L set forth in the apple	is form indicates that a Release Abatement Measure Statuse response action(s) that is (are) the subject of this submittation c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and licable provisions of M.G.L. c. 21E and 310 CMR 40.0000 autified in this submittal;	I (i) is (are) being implemented in accor reasonable to accomplish the purposes	dance with the applicable of such response action(s) as
implemented in accomplish the pur	his form indicates that a Release Abatement Measure Comment is being submitted, the response action(s) that is (are) cordance with the applicable provisions of M.G.L. c. 21E and poses of such response action(s) as set forth in the applicate identified provisions of all orders, permits, and approvals in	the subject of this submittal (i) has (hay I 310 CMR 40.0000, (ii) is (are) appropriole provisions of M.G.L. c. 21E and 310	re) been developed and ate and reasonable to
to be false, inaccur	prificant penalties may result, including, but not limited to, porate or materially incomplete.		
issued by DEI	the Response Action(s) on which this opinion is based, if an P or EPA. If the box is checked, you MUST attach a statem	ant identifying the applicable provincens	thereof.
LSP <u>Will</u> Name:	liam R. Swanson LSP#: 6406	Stamp: WILLIAM R. SWANSON	
Telephone 617-	-452-6274 Ext.: 8458		
FAX: _6.1	17-452-8274	- SE WILLIAM PRI	
(optional)	Jet HAD	SWANSON SWANSON	
Signature:	1 the 11 John	3 2 100.0000	<u> </u>
Date:	3/15/00	- SITE PROFILE	
	An LSP Opinion is not required for a Utility-Re	000000000000	n
An I SP Opinion is	s not required for a URAM Completion Statement if the U		
100 cubic ya	rds of soil contaminated by Oil, or not more than 20 cub a mixture of Hazardous	ic yards of soil contaminated either I Material and Oil.	y Hazardous Material or
K. PERSON UN	IDERTAKING RAM OR URAM:		
Name of Organization:	Buckley and Mann Inc.		6 3 3 30 5
Name of Contact:	Richard Mann/ Stephen Mann	Title: Owners	
102000000000000000000000000000000000000	h Pond Lane		
City/Town: Nor:	folk	State _MA ZIP Code: _0	2056-0000
Telephone: 781	-828-0029 Ext.: 3442	: FAX:	
Chack hare	f there has been a change in person undertaking the RAM o	(optional)	
L Check hele h	. Lioro has been a shange in person undertaking the total o		

D E P

Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Number 3 - 173

RELATIONSHIP TO SITE OF PERSON UNDE	RTAKING RAM or	r URAM: (check one)
RP or PRP Specify ① Owner Operato	Generator 🔘	Transporter Other RP or PRP:
Fiduciary, Secured Lender or Municipality with Exe	empt Status (as define	
Agency or Public Utility on a Right of Way (as defin	ned by M.G.L. c. 21E,	, s. 5(j))
Any Other Person Undertaking RAM or URAM S Relationship:	specify	
M. CERTIFICATION OF PERSON UNDERTAKEN		
I,	, attest under the ttal, including any and for obtaining the informplete, and (iii) that I stity on whose behalf timent, for willfully sub-	pains and penalties of perjury (i) that I have personally examined and all documents accompanying this transmittal form, (ii) that, based on rmation, the material information contained in this submittal is, to the am fully authorized to make this attestation on behalf of the entity this submittal is made am/is aware that there are significant penalties, mitting false, inaccurate, or incomplete information.
By Steple Cham		Title: TROASURER
(signature) For Buckley and Mann Inc.		Title: \[\sqrt{eensurer} \] Date: \[3 \sqrt{20 \left(oc \)} \]
: (print name of person or entity recorded in Section	K)	. ,
Enter address of person providing certification, if differe K: Street: N/A		
City/Town:		State ZIP Code:
Telephone:	Ext	FAX:
INCOMPLETE. IF YOU SUBMIT A	AN INCOMPLETE F A REQUIRED	HIS FORM OR DEP MAY RETURN THE DOCUMENT AS FORM, YOU MAY BE PENALIZED FOR MISSING DEADLINE.

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

1. Previous filing

The original RAM Plan was filed on May 28, 1996, and the revised RAM plan was filed in December 1997. The previous RAM Status report was filed in September 1999.

2. Work since the last report

None. Sampling and analysis work at the former dyehouse wastewater treatment impoundments must wait until the groundwater table drops, in late summer 2000.

3. Work planned

The following tasks remain to complete the work in 2000:

- Obtain a Certificate of Compliance from the Norfolk Conservation Commission for work subject to the Order of Conditions for the consolidation area cover.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.
- Sample soils from the bottom of former dyehouse wastewater treatment impoundments for PAH compounds, and determine the closure requirements (if any) for the impoundments.

23.00 PM

Department of Environmental Protection Northeast Regional Office 205 Lowell Street Wilmington, MA 01887

Buckley & N.fann, Inc. 14 Bush Ponal Road: Norfolk, MA 02:056 AL

3-0173

Messrs. Richard & Stephen Mann Buckley & Mann, Inc. 14 Bush Pond Road Norfolk, MA 02056

June 2, 1988 CANNED

Department of Environmental Protection Northeast Regional Office 205 Lowell Street Wilmington, MA 01887

Enclosed please find a semi-annual Status Report for the Release Abatement Measure at the Buckley & Mann property at 17 Lawrence Street, Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173. We apologize for the lateness of this report, but we were busy preparing to execute a contract for remediation work.

If you have any questions, please contact us at (781) 828-0029 X3442 or X3427.

Stephen Tham, TREASURER.

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC. CAMBRIDGE, MASSACHUSETTS

May 1998

Robert A. Dangel Licensed Site Professional # 7798

William R. Swanson Licensed Site Professional # 6406

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

1. Previous filing

. 4

The RAM Plan was filed on May 28, 1996.
The previous RAM Status report was filed in September 1997.

2. Work since the last report

A revised RAM plan was filed with the DEP, reflecting a new approach of consolidating the contaminated soil on-site under an engineered cap and adopting an Activity and Use Limitation to restrict future use of the area.

Final drawings and specifications for the revised plan were prepared, bid and a contract for the work was executed. Construction began on May 4, 1998.

Work planned

Construction of the engineered cap should be completed by mid-June 1998. Subsequently, B&M will prepare an AUL and file a RAM completion report.



Massachus Department of Environmental Extection Bureau of Waste Site Cleanup

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

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Release Tracking Number

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rsuant to 310 CMR 40.0444 - 0446 ar	ind 310 CMR 40.0462 - 0465 (Subpart D)	

A. SITE LOCATION:	
Site Name: (optional) Buckley and Mann, Inc.	
Street: 17 Lawrence Street	Location Aid: Bush Pond
City/Town: Norfolk, Massachusetts	ZIP Code: <u>02056-0000</u>
Check here if a Tier Classification Submittal has been provided to DEP for this F	Release Tracking Number.
Related Release Tracking Numbers That This RAM or URAM Addresses:	# × 30
B. THIS FORM IS BEING USED TO: (check all that apply)	
Submit a RAM Plan (complete Sections A, B, C, D, E, F, J, K, L and M).	
Check here if this RAM Plan is an update or modification of a previously ap	proved written RAM Plan. Date Submitted:
Submit a RAM Status Report (complete Sections A, B, C, E, J, K, L and M).	
Submit a RAM Completion Statement (complete Sections A, B, C, D, E, G, J,	
Confirm or Provide URAM Notification (complete Sections A, B, H, K, L and M)	D. JUN 8 1998
Submit a URAM Status Report (complete Sections A, B, C, E, J, K, L and M).	D. NORTHEAST REGION
Submit a URAM Completion Statement (complete Sections A, B, C, D, E, I, J,	The track of the contract of t
You must attach all supporting documentation required for e any Legal Notices and Notices to Public Officia	
C. SITE CONDITIONS:	
Check here if the source of the Release or Threat of Release is known.	i
If yes, check all sources that apply: UST Pipe/Hose/Line	AST Drums Transformer Boat
	s, coal ash and textile plant wastes
	ndwater Surface Water Sediments Soil
Wetlands Storm Drain Paved Surface Private We	
School Unknown Other Specify:	Table Viale Supply 2016 2 Residence
Identify Release and/or Threat of Release Conditions at Site: (check all that apply)	
2 and 72 Hour Reporting Condition(s) 120 Day Reporting C	
Describe: Metals, PAH and TPH from building debri	
Seasible. Metata, Fan and Fri Itom Bulliding debil	s, coar asu and textile prant wastes
RAMs may be conducted concurrently with an IRA	only with written DEP approval
URAMs may not be conducted if any 2 or 72 Hou	
Identify Oils and Hazardous Materials Released: (check all that apply)	Sils Chlorinated Solvents
✓ Others Specify: <u>PAH</u> , <u>TPH</u>	
D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)	_
Assessment and/or Monitoring Only	Deployment of Absorbant or Containment Materials
Excavation of Contaminated Soils	Temporary Covers or Caps
Re-use, Recycling or Treatment	Bioremediation
On Site Off Site Est. Vol.: cubic ya	rds Soil Vapor Extraction
Describe:	Structure Venting System
Store On Site Off Site Est. Vol.:cubic ya	rds Product or NAPL Recovery
SECTION D IS CONTINUED ON	THE NEXT PAGE.



Massachuse Department of Environmental Feetion Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM
Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release	Tracking	Number
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D. DESCRIPTION OF RESPO	NSE ACTIONS (continued):		To (easpears)
Landfill Cover	O Disposal Est. Vol.: cubic ya	ards	Groundwater Treatment Systems
Removal of Drums, Tanks or (containers		Air Sparging
Describe:			Temporary Water Supplies
Removal of Other Contaminate	d Media	$\overline{\Box}$	Temporary Evacuation or Relocation of Residents
Specify Type and Volume:		<u> </u>	Fencing and Sign Posting
Other Response Actions De	escribe:		
	See 310 CMR 40.0442 for limitations on t See 310 CMR 40.0464 for performance	he scope and	type of RAMs.
Check here if this RAM or URA Innovative Technologies Clearing	M involves the use of Innovative Technologies.		
Describe Technologies:			
E. TRANSPORT OF REMEDIA	TION WASTE: (if Remediation Waste has	been sent to ar	n off-site facility, answer the following questions)
Name of Facility:			
Town and State:			- 1
Quantity of Remediation Waste Trans	nsported to Date:		
F. RAM PLAN:			
Check here if this RAM Plan re	ceived previous oral approval from DEP as a con	ntinuation of a L	Imited Removal Action (LRA).
			•
If a RAM Compliance Fee is re See 310 CMR 40.0444(2) to le	quired, check here to certify that the fee has beer arn when a fee is not required.	n submitted. Y	ou MUST attach a photocopy of the payment.
Check here if the RAM Plan is	proposed for a Transition Site. If this is the case eviously provided. See 310 CMR 40.0600 for furt	, you may need ther information	t to attach an LSP Evaluation Opinion prior to about Transition Sites.
G. RAM COMPLETION STATE		**	
submitted. You MUST attach a	quired in connection with submission of the RAM photocopy of the payment. You owe this fee who ed an LRA, and have NOT previously submitted a	en submitting a	ratement, check here to certify that the fee has been RAM Completion Statement if you received oral d accompanying fee.
If any Remediation Waste will Statement, you must submit a P	be stored, treated, managed, recycled or reu: hase IV Remedy Implementation Plan, along RAM Completion Stat	with the appro	following submission of the RAM Completion opriate transmittal form, as an attachment to the
H. URAM NOTIFICATION:		- 42	
Identify Location Type: (check all the	at apply) Public Right of Way	Utility Ea	sement Private Property
Identify Utility Type: (check all that a	pply) Sanitary/Combined Sewerage	☐ Wa	ter Drainage Natural Gas
Telephone Steam	Lines Telecommunications Ele	ectric	Other Specify:
Check here if you provided DEF	with previous oral notification of this URAM. D	ate of Oral Not	ice:
Check here if the property owner the owner was not contacted, in	er was NOT contacted prior to initiation of the UR cluding the date and time when contact ultimateh	RAM. If this is to occurred.	the case, you must attach an explanation of why
Check here if this URAM will on	cur in connection with the construction of new pu ation, the scope and expense of necessary mitiga	ublic utilities If	this is the case, document the nature and enefits amd limitations of project alternatives.
	person undertaking the URAM must provide the		
LSP Name:	44.	LSP License	Number:
LSP information is not required	if the URAM is limited to the excavation and/or ha	andling of not m	nore than 100 cubic yards of soil contaminated by

Massachuse Department of Environmental Perception Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT

Release Tracking Number

DEP	Pursuant to 310 CMR 40.0444 - 0446 and 310 CM		3 - 173
I. URAM COMPLE	TION STATEMENT:		
	is URAM was limited to the excavation and/or handling of no ards of soil contaminated by either a Hazardous Material or a		ted by Oil, or not more
	on Waste will be stored, treated, managed, recycled or nust submit either a Release Abatement Measure (RAM appropriate transmittal form, as an attachme) Plan or a Phase IV Remedy Implementati	
J. LSP OPINION:			2
documents accompan	ns and penalties of perjury that I have personally examined a nying this submittal. In my professional opinion and judgme able provisions of 309 CMR 4.02(2) and (3), and (iii) the prof,	nt based upon application of (i) the standard o	f care in 309 CMR
submittal (i) has (have reasonable to accomp	form indicates that a Release Abatement Measure Plan is e) been developed in accordance with the applicable provision plish the purposes of such response action(s) as set forth in dentified provisions of all orders, permits, and approvals iden	ons of M.G.L. c. 21E and 310 CMR 40.0000, (the applicable provisions of M.G.L. c. 21E an	(ii) is (are) appropriate and
being submitted, the of M.G.L. c. 21E and 31	form indicates that a Release Abatement Measure Status response action(s) that is (are) the subject of this submittal (10 CMR 40.0000, (ii) is (are) appropriate and reasonable to a of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y	 is (are) being implemented in accordance was accomplish the purposes of such response ac 	ith the applicable provisions of tion(s) as set forth in the
Statement is being s with the applicable pr action(s) as set forth	form indicates that a Release Abatement Measure Comp submitted, the response action(s) that is (are) the subject of tovisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are in the applicable provisions of M.G.L. c. 21E and 310 CMR is identified in this submittal;	this submittal (i) has (have) been developed ar) appropriate and reasonable to accomplish th	nd implemented in accordance e purposes of such response
I am aware that signif false, inaccurate or m	ficant penalties may result, including, but not limited to, poss naterially incomplete.	ible fines and imprisonment, if I submit inform	ation which I know to be
	ne Response Action(s) on which this opinion is based, if any, if the box is checked, you MUST attach a statement identifyin	or the applicable provisions thereof.	and/or approval(s) issued by
LSP Name: Will:	iam R. Swanson LSP#: 6406	Stamp: WILLIAM R. SWANSON	
Telephone: 617-2	252-8000 Ext.: 8458	WILLIAM R. SWANSON	
FAX: (optional) 61'	7-621-2565	WILLIAM EN SWANSON	
7/17	the 1 do	SWANSON OF ROLL OF STATE OF ST	
Signature:	Leclar	No. 6406	
Date:	26/98	SITE PROFES	
	An LSP Opinion is not required for a Utility-R	elated Abatement Measure Notification.	
	not required for a URAM Completion Statement if the l ds of soil contaminated by Oil, or not more than 20 cub a mixture of Hazardous	oic yards of soil contaminated either by Ha	
K. PERSON UND	PERTAKING RAM OR URAM:		
Name of Organization	n: Buckley and Mann, Inc.		
Name of Contact: _R	ichard Mann/Stephen Mann	Title: <u>Owners</u>	
Street: 15 Bush	Road Land	_	
City/Town: Norfo	olk	State: MA ZIP Code: 020	56-0000
Telephone: _617-8	828-0029 Ext.: 3442	FAX: (optional)	

Check here if there has been a change in person undertaking the RAM or URAM.



Massachuse Department of Environmental Pection Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM Pursuant to 310 CMR 40 0444 - 0446 and 310 CMR 40 0462 - 0465 (Subpart D)

Release Tracking Number

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ruisua	int to 3 to Civin 40.0444 - 0440 and 3 to	J CMR 40.0462 - 0463 (Subpart D)	
L. RELATIONSHIP TO SIT	E OF PERSON UNDERTAKING RAM	or URAM: (check one)	
RP or PRP Specify:	D Owner O Operator O Generator (Transporter Other RP or PRP:	
Fiduciary, Secured Lender	or Municipality with Exempt Status (as defined	ed by M.G.L. c. 21E, s. 2)	ni
Agency or Public Utility on	a Right of Way (as defined by M.G.L. c. 21E,	:, s. 5(j))	
Any Other Person Underta	iking RAM or URAM Specify Relationship:		<u> </u>
I, Richard familiar with the information cont of those individuals immediately knowledge and belief, true, accu this submittal. I/the person or er possible fines and imprisonment By: (signature) For: Buckley and Mann (print name of person or en	tained in this submittal, including any and all decresponsible for obtaining the information, the unate and complete, and (iii) that I am fully authority on whose behalf this submittal is made and, for willfully submitting false, inaccurate, or in	pains and penalties of perjury (i) that I have personally examined a documents accompanying this transmittal form, (ii) that, based on a material information contained in this submittal is, to the best of methorized to make this attestation on behalf of the entity legally responsive aware that there are significant penalties, including, but not like incomplete information. Title: TREASURER Date: 6/2/58	my inquiry ny onsible for
*	ng cerunication, ir different from address record		
		State: ZIP Code:	
Telephone:	Ext.:	FAX: (optional)	
	TE. IF YOU SUBMIT AN INCOMPLETE	THIS FORM OR DEP MAY RETURN THE DOCUMENT E FORM, YOU MAY BE PENALIZED FOR MISSING ED DEADLINE.	
		×	

Messrs. Richard and Stephen Mann CANNED
Buckley & Mann Inc.
14 Bush Pond Road
Norfolk, MA 02056

December 17, 1997

Department of Environmental Protection Northeast Regional Office 10 Commerce Way Woburn, MA 01801

Subject: Buckley & Mann Inc., Bureau of Waste Site Cleanup #3-0173

Attention: Bureau of Waste Site Cleanup

Enclosed are copies of:

A cover letter to the Norfolk Conservation Commission, summarizing the proposed change to the April 1996 Release Abatement Measure (RAM) Plan, A revised RAM Plan with BWSC Transmittal Form 106,

a Phase III Evaluation of Remedial Alternatives Report with BWSC Transmittal Form 108, Specifications and Drawings for the proposed work, and

A Tier II Extension Report with Transmittal Form 107A.

for the Buckley & Mann Inc. site in Norfolk, Massachusetts. As explained in these reports, B&M proposes to consolidate and cover most of the wastes on-site in Area#10, with off-site disposal of a relatively small quantity of unsuitable material.

Copies of this cover letter and the cover letter to the Conservation Commission have also been sent to the Norfolk Board of Selectmen and Board of Health. A complete package has been sent to the Norfolk Conservation Commission, requesting an opinion as to whether B&M would need to file a revised Notice of Intent under the Wetland regulations.

If you have any questions, please contact us at (781) 828-0029 X3442 or X3427

Strate France

/s/

oc: See the distribution list with this letter

DISTRIBUTION LIST, BUCKLEY & MANN REVISED RELEASE ABATEMENT MEASURE PLAN, NOVEMBER 1997

Recipient	Mail method				Number of copies	copies			
North Transfer of the Control of the		Cover Letters *General *Conservation Commission	BWSC 106 Transmittal for RAM Plan	Revised RAM Plan	BWSC 108 Transmittal for Phase III	Phase III Report	Drawings and Specifications	BWSC 107A Transmittal for Tier Ext.	Tier II Extension Report
Buckley & Mann	N/A	-	-	-	1	-		-	-
Department of Environmental Protection Northeast Regional Office 10 Commerce Way Woburn, MA 01801	Certified, Retum Receipt	-	1 (Original. See note.)	1	1 (Original. See note.)	-	-	-	-
Town of Norfolk Board of Selectmen Town Hall 100 Main Street	Regular	-	0	0	0	0	0	0	0
Town of Norfolk Board of Health Town Hall 100 Main Street Norfolk MA 02056	Regular	H .	0	0	0	0	0	0	0
Town of Norfolk Conservation Commission Town Hall 100 Main Street Norfolk, MA 02056	Regular		_	-	-	1	1	0	0
Total photo copies (excluding original)		5 (draft enclosed)	2 (see note)	æ	2 (see note)	3	8	2	2
Note: Originals with CDM LSP signature are enclosed. Sign each and make copies for distribution, including 1 copy each for CDM.	re are enclosed. S	ign each and make	copies for distrib	ution, including 1	copy each for CDM.				



Camp Dresser & McKee Inc.

consulting engineering construction operations Ten Cambridge Center Cambridge, Massachusetts 02142 Tel: 617 252-8000 Fax: 617 621-2565

December 5, 1997

Town of Norfolk Conservation Commission Town Hall 100 Main Street Norfolk, MA 02056

Subject:

Buckley & Mann property, Norfolk, MA

Cons. Comm. File # 240-191, MCP Site # 3-0173

Dear Conservation Commission:

Camp Dresser & McKee Inc. is pleased to present the enclosed documents on behalf of Buckley & Mann, Inc. (B&M), Norfolk, Massachusetts.

B&M obtained an Order of Conditions from the Commission in August 1995 for work related to assessment and remediation of contaminated soils at its Lawrence Street property. In April 1996, B&M submitted a Massachusetts Contingency Plan (MCP) Release Abatement Measure (RAM) Plan related to excavation and disposal of contaminated soils from certain portions of the site. The Department of Environmental Protection (DEP) did not comment on the Plan, which thereby received presumptive approval. A construction bid package for the proposed work was prepared in October 1996 but not issued, pending resolution of matters internal to B&M.

The enclosed MCP Phase III Evaluation of Remedial Alternatives and amended RAM Plan describe a modest change in the proposed approach to complete a "Permanent Solution" under the MCP. The primary change from the April 1996 Plan is to reduce the volume of material to be shipped off-site. Under the revised approach, material with relatively low contaminant concentrations which was to be shipped to a landfill for reuse as daily cover would instead be retained at B&M. The material would be consolidated in the area where the bulk of the coal ash and Carbonizer Spoils have rested for the last 40 to 100 years. The consolidation area would be covered with a geotextile and a two foot thick cover of clean sand from an on-site source, followed by loaming and seeding. This approach is consistent with the current trend in site remediation toward solutions which incorporate on-site measures rather than off-site disposal of contaminated where:

- the contaminated soils can be consolidated and covered,
- the contaminants are not likely to migrate, and
- future exposure pathways to the contaminated soil can be controlled by adoption of an Activity and Use Limitation (AUL).

The revised approach is suited to B&M because the material to remain on-site:

has contaminant concentrations only slightly above the applicable MCP Method 1 Risk limits and far below Upper Concentration Limits (a Permanent Solution is often not possible if concentrations exceed the Upper Concentration Limits), and





Norfolk Conservation Commission December 5, 1997 Page 2

 does not pose a significant risk of leaching contaminants into groundwater, based on past monitoring results (a confirmatory groundwater sampling and analysis round is planned).

The revised approach also addresses B&M's concern over the ultimate volume and associated cost for off-site reuse/disposal of the debris, coal ash and Carbonizer spoils. While the horizontal extent of these materials is reasonably well known, depth data are incomplete because some of the test pits excavated in late 1995 did not reach the bottom of fill material. Excavation was stopped either because the fill material appeared uniform with depth or because the excavation reached the groundwater table. Hence, the April 1996 RAM Plan estimate of the volume of material to be removed may have been low. If the volume significantly exceeded estimates, or if the material was not accessible due to high groundwater, a cover similar to the one proposed in the revised RAM Plan might be needed in lieu of full excavation and removal. The revised RAM Plan avoids this problem assuming that contaminated soils will remain onsite, and prepares for that condition with a cover design.

The revised approach retains the original intent to monitor the course of excavation and separate materials unsuitable for retention on site. Such materials, judged to be dissimilar to the "urban fill" appearance of the material found in most of the test pits and suspected of having high concentrations of contaminants, would be shipped to a suitable disposal facility after the appropriate characterization.

The lateral extent of the work area for the revised approach is essentially the same as in the April 1996 RAM Plan. The work would be in the buffer zone near the Tail Race. The changes in the new Plan would result in:

- clearing a slightly larger area and
- establishing a higher finished grade in the former Carbonizer Spoils area, as shown on the enclosed drawing.

These changes would not have an adverse impact on the Tail Race or the wetland to the north of the work area.

Currently, dense vegetation limits access to parts of the proposed work area. Consequently, trees and brush would have to be cleared before installation of the hay bale siltation barrier on the northern perimeter of the work area. The siltation barrier would be installed before excavation begins.

Pursuant to Section 10 of the Special Conditions in the Order of Conditions, this letter and the enclosed reports document proposed changes to the RAM Plan. B&M hereby requests an opinion from the Conservation Commission as to whether the changes require filing of a new

CDM Camp Dresser & McKee Inc.

Norfolk Conservation Commission December 5, 1997 Page 3

Notice of Intent. Please respond to:

Stephen Mann, Buckley & Mann Inc., 14 Bush Pond Lane, Norfolk, MA 02056 and

Robert Dangel, Camp Dresser & McKee Inc., 10 Cambridge Center, Cambridge, MA 02142

If you have any questions, please contact Stephen Mann (508) 528-4296 or Robert Dangel at (617) 252-8831.

Very truly yours,

CAMP DRESSER & McKEE INC.

1.16

Approved:

Robert A. Dangel, LSP Principal Scientist William R. Swanson, PE, LSP

Vice President



William F. Weld Governor Daniel S. Greenbaum Commissioner

BUREAU OF WASTE SITE CLEANUP SITE MANAGEMENT BRANCH

TELEPHONE CONVERSATION NOTES

SITE NAME: Buckley + mann, Inc.
SITE NUMBER: 3-0173
SITE LOCATION: 17 Sawrence St.
DATE: 6/23/98 TIME:
FROM: Jounne Fagen REPRESENTING: DEP
TO: William Swanson, LSP REPRESENTING: CDM 617-252-8458
DISCUSSION: The writer called Try-Swanson to comment on
The RAM Status Report dated Jame 2, 98:
1) The report refers to the proposed cap as an "engineered cap".
a pointed out that an "engineered barrier", as befored in the mcp
must meet RCRA capping requirements at a minimum
Mr. Swanson replied that his proposal was not meant as an
"lagneered barrier".
2) If the fiture use of the site is residential or recreational,
the cap must have a geomembrane covered with 3 ft. of
aca minumien, not a ft- of soil. Mr. Awanson replied
that he had recently discussed this issue with his chart
they now appled to add another foat of soil to meet this reasons
THUE cannot be submitted, be in the part of
" completion someway,
O Commerce Way ● Woburn, Massachusetts 01801 ● FAX (617) 935-6393 ● Telephone (617) 935-2160



SCANNED Pracking

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BWSC-10

TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

A. DISPOSAL SITE LOCATION:	
Disposal Site Buckley & Mann, Inc.	
Street: 17 Lawrence Street	Location Aid: Bush Pond
City/Town: Norfolk, MA 2	ZIP _02056-0000
Related Release Tracking Numbers That This Submittal Will	
B. THIS FORM IS BEING USED TO: (check all that apply)	
Submit a new or revised Tier Classification Submittal for a Tier I Site, includi (complete Sections A, B, C, I, J, K and L).	ing a Numerical Ranking Scoresheet
Submit a new or revised Tier Classification Submittal for a Tier II Site, include (complete Sections A, B, C, F, G, I, J, K and L).	ding a Numerical Ranking Scoresheet
Submit a Notice that an additional Release Tracking Number(s) is (are) being required at this time (complete Sections A, B, J, K and L). If this submittal is for Modification Transmittal Form (BWSC-109).	ng linked to this Tier Classified Site and rescoring is not r a Tier I Site, you must also submit a Minor Permit
List Additional Release Tracking	1 10000000
Submit a Phase I Completion Statement supporting a Tier Classification Se	ubmittal (complete Sections A, B, I, J, K and L).
Submit a Tier II Extension Submittal for Response Actions at a Tier II Site (co	emplete Sections A, B, D, F, G, I, J, K and L).
Submit a Tier II Extension Submittal for Response Actions taken after explications (complete Sections A, B, D, F, J, K and L, and also complete Sections G and I	iration of a Waiver, pursuant to 310 CMR 40.0630(4) or Section H).*
Submit a Tier II Transfer Submittal for a change in person(s) undertaking Res (complete Sections A, B, E, F, G, I, J, K, L, M, N and O).	sponse Actions at a Tier II Site
Submit a Tier II Transfer Submittal for a change in person(s) undertaking F 310 CMR 40.0630(6) (complete Sections A, B, E, F, J, K, L, M, N and O, and a	
You must attach all supporting documentation requincluding copies of any Legal Notices and Notices to Pub *NOTE: The Walver expires on the effective date of this submittal and all	lic Officials required by 310 CMR 40.1400.
C. TIER CLASSIFICATION SUBMITTAL:	
Numerical Ranking Score for Disposal Site: (from Numerical Ranking	
Proposed Tier Classification of Disposal Site: (check one)	Tier IB Tier IC Tier II
Groundwater is located within an Interim Wellhead Protection Area or a Z	one II, and there is evidence of groundwater contamination by
an Oil or Hazardous Material at the time of Tier Classification at concentration set forth in 310 CMR 40.0360.	ations equal to or exceeding the applicable RCGW-1
An Imminent Hazard is present at the time of Her Classification	1.07 5 100 1
Check here if this Tier Classification revises a previous submittal for this Dispo Scoresheet with this submittal. If a Tier I Permit has been issued, you may also 10).	sal Site. You must include a revised Numerical Ranking oneed to submit a Major Permit Modification Application (BWSC
If incorporating additional Release(s) into the Disposal Site, list Release Track	100000000
D. TIER II EXTENSION SUBMITTAL	The state of the s
State the expiration date of the Tier II Classification or Walver for the Disposal Site,	whichever is 02/22/99
Attach a statement summarizing why a Permanent or Temporary S A Tier II Extension is effective for a period of one year beyond the curre	
E. TIER II TRANSFER SUBMITTAL REQUIREMENTS:	
State the proposed effective date of the change in person(s) undertaking Response	Actions at the Disposal
Attach a statement summarizing the reasons for the proposed chain All Response Actions must be completed by the deadline applicable to the period Disposal Site or received a Wah	rson who first filed either a Tier Classification Submittal for the



BWSC-107A

TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

DISPOSAL SITE COMPLIANCE HISTORY SUMMARY.

Release Tracking

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> If pr	ling either a Tier Classification Submittal for a Tier II Site or a Tier II Extension Submittal for a Waiver Site, th	na nareon namad

Section J must provide a Compliance History. > If providing a Tier II Extension Submittal for a Tier II Site, the person named in Section J must update their Compilance History since the effective date of the Tier II Classification. > If providing a Tier II Transfer Submittal for a Tier II or Walver Site, the person named in Section M must provide a Compliance History. Compliance History for (provide only one name per Buckley & Mann, Inc. Check here if there has been no change to the Compliance History of the person named above (Extension Submittal for a Tier II Site ONLY). List all permits or licenses that have been issued by the Department that are relevant to this Disposal Site: PROGRAM: PERMIT NUMBER: PERMIT CATEGORY: FACILITY ID: Air Quality 0 Hazardous Waste (M.G.L. c. 21C) Solid Waste Industrial Wastewater Management Water Supply Water Pollution Control/Surface Water Water Pollution Control/Groundwater Water Pollution Control/Sewer Connection Wetland & Waterways List all other Federal, state or local permits, licenses, certifications, registrations, variances, or approvals that are relevant to this Disposal Site: ISSUING AUTHORITY OR PROGRAM, OR DOCUMENTATION TYPE: DATE ISSUED: **IDENTIFICATION NUMBER:** Inactive site If needed, attach to this Transmittal Form a statement further describing the Compliance History of this Disposal Site. This statement must describe the compliance history of the person named above with the following: (1) DEP regulations; and (2) other laws for the protection of health, safety, public welfare and the environment administered or enforced by any other government Such a statement should identify information such as: (1) actions relevant to the Disposal Site taken by the Department to enforce its requirements including, but not limited to, a Notice of Noncompliance (NON), Notice of Intent to Assess Civil Administrative Penalty (PAN), Notice of Intent to Take Response Action (NORA), and an administrative enforcement order; (2) administrative consent orders; (3) judicial consent judgements: (4) similar administrative actions taken by other Federal, state or local agencies; (5) civil or criminal actions relevant to the Disposal Site brought on behalf of the DEP or other Federal, state, or local agencies; and (6) any additional relevant information. (1) name of the Issuing authority, type of action, identification number and date issued: (2) description of noncompliance cited; (3) current status of the matter; and

(4) final disposition, if any.



BWSC-107A

TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking

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G. CERTIFICATION OF ABILITY AND WILLINGNES	SS.
person	Fier II Extension Submittal, the person who signs this certification MUST be the
named in Section J, or that person's agent.	
examined and am/is familiar with the requirements of M.G.L. Professional(s) employed or engaged to render Professional person(s) or entity(ies) on whose behalf this submittal is mad necessary response actions, that/those person(s) or entity(le for such site in accordance with M.G.L. c. 21E, 310 CMR 40. this attestation on behalf of the person(s) or entity(ies) legally	person(s) or entity(ies) on whose behalf this submittal is made has/have personally c. c. 21E and 310 CMR 40.0000; (ii) based upon my inquiry of the/those Licensed Site I Services for the disposal site which is the subject of this Transmittal Form and of the de, and my/that person's(s') or entity's(ies') understanding as to the estimated costs of as) has/have the technical, financial and legal ability to proceed with response actions .0000 and other applicable requirements; and (iii) that I am fully authorized to make y responsible for this submittal. I/the person(s) or entity(ies) on whose behalf this 40.0172 for notifying the Department in the event that I/the person(s) or entity(ies) on a unable to proceed with the necessary response actions.
n -17x11	0 - 1 -
By: (signature)	Title: President
	11/-100
For: Buckley & Mann, Inc. (print name of person or entity recorded in Section J or	Date:
you may choose to sign the alteri in place of providing the ce	Submittal for a Walver Site or a Tier II Transfer Submittal for a Walver Site, native Ability and Willingness Certification found in Section Hertification in Section I.
you may choose to sign the altern in place of providing the ce H. ALTERNATIVE CERTIFICATION OF ABILITY At	native Ability and Willingness Certification found in Section H ortification in Section G and the LSP Opinion in Section I. ND WILLINGNESS:
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you may choose to sign the altern in place of providing the ce H. ALTERNATIVE CERTIFICATION OF ABILITY At If providing a Tier II Extension Submittal for a Walver Si or that person's agent If providing a Tier II Transfer Submittal for a Walver Site in the person's agent I attest under the pains and penalties of perjury that (i) I/the pexamined and am/is familiar with the requirements of M.G.L. Consultant-of-Record for the disposal site which is the subject submittal is made, and my/that person's(s') or entity's(les') ur person(s) or entity(les) has/have the technical, financial and c. 21E, 310 CMR 40.0000 and other applicable requirements or entity(les) legally responsible for this submittal. I/the person entity(les) legally responsible for this submittal. I/the person requirements in 310 CMR 40.0172 for notifying the Department and learn(s) that it/they is/are unable to proceed with the new contraction.	native Ability and Willingness Certification found in Section Hertification in Section G and the LSP Opinion in Section I. ND WILLINGNESS: ite, the person who signs this certification MUST be the person named in Section J, e, the person who signs this certification MUST be the person named in Section M, or person(s) or entity(ies) on whose behalf this submittal is made has/have personally c. 21E and 310 CMR 40.0000; (ii) based upon my inquiry of the ict of this Transmittal Form and of the person(s) or entity(ies) on whose behalf this inderstanding as to the estimated costs of necessary response actions, that/those legal ability to proceed with response actions for such site in accordance with M.G.L. s; and (iii) that I am fully authorized to make this attestation on behalf of the person(s) ion(s) or entity(ies) on whose behalf this submittal is made is aware of the ent in the event that I/the person(s) or entity(ies) on whose behalf this submittal is recessary response actions.
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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 (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information

- > if Section B of this form indicates that a Tier I or Tier II Classification Submittal which relies upon a previously submitted Phase I Completion Statement is being submitted, this Tier Classification Submittal has been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;
- > if Section B of this form indicates that a Phase I Completion Statement or a Tier I or Tier II Classification Submittal which does not rely upon a previously submitted Phase I Completion Statement 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) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

SECTION I IS CONTINUED ON THE NEXT PAGE



BWSC-107A

TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking

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. LSP OPINION: (continued)	
if Section B of this form indicates that a Tier II Extension Submittal or a Tier that is (are) the subject of this submittal (i) is (are) being implemented in accorda 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of M.G.L., c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified pro	ance with the applicable provisions of M.G.L. c. 21E and 310 CMR such response action(s) as set forth in the applicable provisions of
I am aware that significant penalties may result, including, but not limited to, pos to be false, inaccurate or materially incomplete.	
Check here if the Response Action(s) on which this opinion is based, if any issued by DEP or EPA. If the box is checked, you MUST attach a statement	r, are (were) subject to any order(s), permit(s) and/or approval(s) nt identifying the applicable provisions thereof.
LSP Name: William R. Swanson LSP #: 6406	Stamp:
Telephone: 617-252-8000 Ext.: 8458	Stamp: WILLIAM
FAX: 617-621-2565	_ 1181 K. 1318
Signature: William R. Moranson	AL SWANSON LIB
Date:11/2/98	SITE PROTESTA
J. PERSON MAKING SUBMITTAL: (For Transfer Submittals describe p	person currently undertaking response actions, not transferee)
Name of Buckley & Mann, Inc.	
Name of Richard Mann/Stephen Mann	Title: Owners
Street: 14 Bush Pond Lane	_
City/Town: Norfolk	State: MA ZiP Code: 02056-0000
Telephone: 781-828-0029 Ext.: 3442	FAX:
K. RELATIONSHIP TO DISPOSAL SITE OF PERSON MAKING SUB	MITTAL: (check one)
RP or PRP Specify • Owner Operator Generator	Transporter Other RP or PRP:
Fiduciary, Secured Lender or Municipality with Exempt Status (as defined to	oy M.G.L. c. 21E, s. 2)
Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s.	5(j))
Any Other Person Making Submittal Specify	
L. CERTIFICATION OF PERSON MAKING SUBMITTAL:	
I, Richard Mann, , attest under the paint familiar with the information contained in this submittal, including any and all dot inquiry of those individuals immediately responsible for obtaining the information my knowledge and belief, true, accurate and complete, and (iii) that I am fully au responsible for this submittal. I/the person or entity on whose behalf this submit including, but not limited to, possible fines and imprisonment, for willfully submit By:	n, the material information contained in this submittal is, to the best of ithorized to make this attestation on behalf of the entity legally tal is made am/is aware that there are significant penalties, ting false, inaccurate, or incomplete information. Title: Projumphore
For Buckley & Mann, Inc.	Date:
(print name of person or entity recorded in Section J)	ALL SIME AS S. NO. NO. AND PART OF S.
Enter address of the person providing certification(s), including Ability and Willin recorded in Section J:	ngness Certification where applicable, if different from address
Street:	
City/Town:	State: ZIP Code:
Telephone: Ext.:	FAX:
YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THE	S FORM OR DEP MAY RETURN THE DOCUMENT AS

YOU MUST 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, AND YOU MAY INCUR ADDITIONAL COMPLIANCE FEES.

MCP TIER II EXTENSION REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC. CAMBRIDGE, MASSACHUSETTS

November 2, 1998

Robert A. Dangel Licensed Site Professional # 7798 William R. Swanson Licensed Site Professional # 6406

MCP TIER II EXTENSION REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS

BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

The first year of the Tier II extension for this site expires on February 22, 1999.

This report describes the progress made over the last 12 months and plans to complete remediation at the site.

The following work was completed during the 1988 Tier II extension period:

- Groundwater sampling and analyses
- Preparation of final drawings and specifications for the remediation work
- Solicitation of bids and award of a contract for the remediation work
- Substantial completion of the remediation work, in accordance with the Release Abatement Measures Plan

Appendix A to this Tier II Extension report contains a detailed description of the work completed.

The following tasks remain to complete the work in 1999:

- Remove approximately 50 cubic yards contaminated soil from Area 5 and place the material under the cover in the Area 10 consolidation area. This material was overlooked in the May and June remediation work.
- Add approximately 2,000 cubic yards additional sand and a loam layer to complete the three foot consolidation area cover, followed by hydroseeding.
- Obtain a Certificate of Compliance from the Norfolk Conservation Commission.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.



RELEASE ABATEMENT MEASURE NOVEMBER 1998 STATUS REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC. CAMBRIDGE, MASSACHUSETTS

November 2, 1998

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RELEASE ABATEMENT MEASURE NOVEMBER 1998 STATUS REPORT BUCKLEY & MANN INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEANUP SITE NUMBER 3-0173

1.0 INTRODUCTION

This status report documents the progress toward completion of the Release Abatement Measure (RAM) at the Buckley & Mann Inc. (B&M) site in Norfolk, Massachusetts. The Revised RAM Plan for B&M was submitted to Department of Environmental Protection (DEP) in November 1997.

2.0 PREVIOUS REPORTS

The RAM Plan addressed the two acres (referred to as Area 10) on which the Carbonizer spoils, coal ash and building demolition debris were disposed, three small areas (Areas 3, 5 and 6) of contaminated soil associated with the former dyehouse wastewater treatment Lagoons 1 and 2, and 11 drums of sand scraped from Lagoon 1 (Area 4) and from a small pit with dye past (Area 7).

A complete description of the manufacturing operations, characterization data, site conditions, and surrounding receptors is included in the Site Assessment and Remediation Status Report and Release Abatement Measures Plan Support Document, submitted to DEP in April 1996. Site assessment data showed that soil contaminant concentrations are only slightly above the applicable MCP S-2 No Significant Risk Criteria. The contaminants of concern are chromium, lead, and polyaromatic hydrocarbons (PAHs).

3.0 DESCRIPTION OF RELEASE ABATEMENT MEASURE

3.1 Summary

The RAM for this site consisted of the following major components:

- groundwater monitoring
- site clearing;
- excavation and onsite consolidation (in Area 10) of contaminated soils, Carbonizer spoils, coal ash, building demolition debris, and wastewater lagoon residues;
- off-site disposal of unsuitable material; and
- installation of a cover system.

The work followed the RAM Plan, except that the design thickness for the clean sand cover was increased to three feet, as suggested by the DEP, instead of the two feet originally planned. Also,

a small volume of material tentatively selected for off-site disposal, rather than on-site consolidation, was retained on-site, as described in Section 3.7 of this report.

B&M contracted with Fleet Environmental Services, Inc. to perform the work. Fleet subcontracted the excavating, hauling, and grading operations to G. Lopes Construction Inc. Camp Dresser & McKee Inc. (CDM) provided resident engineering. The site work began May 11, 1998 and was substantially complete on June 24, 1998.

An Activity and Use Limitation (AUL) will be established to restrict future use of the consolidation area. This approach to site closure was determined to reach a condition of No Significant Risk, as described in the *Evaluation of Remedial Action Alternatives (Phase III)*, which was submitted to DEP in November 1997.

3.2 Groundwater Sampling and Analyses

CDM sampled monitoring wells 1, 2, 3, 3A, 4, 5, 6 and EW-2 in May 1998. Well EW-1 was filled with silt and could not be sampled.

Table 1 summarizes the groundwater analytical data. The data were originally reported on May 26, 1998, but at CDM's request, the laboratory later issued a revised report with lower "non-detect" concentrations for Polyaromatic Hydrocarbons (PAH). The lower non-detect concentrations were obtained on further review of the original electronic data files from the analytical instruments. The lower non-detect limits are in the range of the MCP standards for the most restricted PAHs. Copies of the complete laboratory reports will be included as an Appendix to the RAM completion statement.

Table 1 shows that the PAH and metals concentrations were all below the applicable MCP GW-1 and GW-3 standards.

Wells 3, 4 and 6 had Chemical Oxygen Demand (COD) concentrations of 190, 190, and 340 mg/L. These samples were subsequently tested for Total Organic Carbon (TOC), to determine whether the COD was attributable to iron or organic compounds. The TOC concentrations, at 14, 17 and 24 mg/L, showed that approximately 20 percent of the COD was attributable to organic compounds, with the remainder likely attributable to iron. Considering that the areas around these shallow wells are wetlands, the organic component is likely decayed plant material.

Groundwater elevation measurements confirmed that the static head in bedrock well 3A was higher than the adjacent shallow well in the unconsolidated soil. This shows that groundwater from the surrounding hills discharges to the Mill River and the Tail Race, and that the area around the lagoons is not a recharge zone. The field data also showed high iron concentrations (based on rust discoloration in many samples) and high turbidity from silt.

Monitoring wells 1 and 4, located within the consolidation area, were destroyed during

TABLE 1
BUCKLEY MANN INC.
GROUNDWATER ANALYSES
Samples collected on 7 May 1998

CDM Lab # pH ms/cm mg/L NTU ug/L				Conductivity	00	Turbidity	PAH	Chr	hromium	Lead	Ę	Zinc	TOC	COD	_	Groundwater
98-040XX (See note) (See note) 56 6.4 0.113 8.4 496 < 0.7 < 0.85 < 1.4 57 6.0 0.085 1.7 520 1.4 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 < 0.85 <t< th=""><th>Well#</th><th>CDM Lab#</th><th>Hd</th><th>ms/cm</th><th>mg/L</th><th>UIN</th><th>ug/L</th><th>3</th><th>g/L</th><th><i>g</i>n</th><th>لم لم</th><th>ng/L</th><th>mg/L</th><th>mg/L</th><th></th><th>elev., Ft</th></t<>	Well#	CDM Lab#	Hd	ms/cm	mg/L	UIN	ug/L	3	g/L	<i>g</i> n	لم لم	ng/L	mg/L	mg/L		elev., Ft
56 6.4 0.113 8.4 496 < 0.7 < 0.85 < 0.85 57 6.0 0.085 1.7 520 1.4 < 0.85 62 6.3 0.086 9.1 999 < 0.85 < 0.85 55 6.2 0.113 6.7 999 < 0.7 < 0.85 < 0.85 59 6.4 0.039 8.4 570 < 0.85 < 0.85 < 0.85 60 6.6 0.220 7.7 999 < 0.85 < 0.85 < 0.85 61 6.5 0.223 1.5 999 < 0.85 < 0.85 < 0.85		98-040XX					(See note)				0					
56 6.4 0.113 8.4 496 < 0.7			1													
57 6.0 0.085 1.7 520 1.4 58 6.3 0.086 9.1 999 < 0.85	EW-2	99	6.4	0.113	4.8	496	< 0.7	٧	0.85	٧	89.0	30		V	5 162	.23
58 6.3 0.086 9.1 999 < 0.85 62 0.113 6.7 999 < 0.7	-	57	0.9	0.085	1.7	520			1.4	V	89.0	49	9.7			.27
62 2.2 55 6.2 0.113 6.7 999 < 0.7	2 (Upgradient)	58	6.3	0.086	9.1	666		٧	0.85	٧	89.0	< 12			15 164	164.90
55 6.2 0.113 6.7 999 < 0.7 32 < 54 6.5 0.133 7.4 386 < 0.7	2 (Duplicate)	62					<u>ac 3</u>		2.2		1.4	< 12		****		
54 6.5 0.133 7.4 386 < 0.7	3	55	6.2	0.113	6.7	666	< 0.7	-	32	٧	0.68	220	14	-		31
6.4 0.039 8.4 570 2.4 6.6 0.220 7.7 999 < 0.85	3A (Bed Rock)	. 54	6.5	0.133	7.4	386	< 0.7	٧	0.85	٧	89.0	< 12		٧		91
6.6 0.220 7.7 999 < 0.85 < 0.223 1.5 999 5.3	4	59	6.4	0.039	8.4	570			2.4	٧	99.0	< 12	17		190 162	03
0.223 1.5 999 5.3	8	09	9.9	0.220	7.7	666		٧	0.85	٧	99.0	< 12		٧	5 160.87	.87
	9	61	6.5	0.223	1.5	666			5.3		3.7	13	24		340 163	68

MCP GW-1	See	e note	100	15	2,000
MCP GW-3	See	e note	2,000	30	006

Notes:

The reporting limits for PAH compounds in CDM's May 26, 1998 laboratory report were too high to allow direct comparison to MCP Method 1 standards. In preparing this report, the laboratory reexamined the original GC/MS data set and set new reporting limits. These new limits are contained in the October 1, 1998 version of the report, for both PAH compounds and metals.

The reporting limits for PAH compounds in groundwater samples ranged from 0.3 to 0.69 ug/L.

The MCP limits for PAH compounds in GW-1 groundwater range from 0.2 ug/L to 3,000 ug/L. GW-3 limits are typically 1 to 3 orders of magnitude higher. The GW-1 limit for naphthalene and 2-methyl naphthalene, the PAH compounds found in B&M Lagoon #1 soils, are 20 and 10 ug/L, respectively.

The field record and consequently, the laboratory reports, inadvertently switched the identification of wells 3 and 3A. This summary table corrects the error.

excavation and moving operations.

3.3 Site Clearing

Existing vegetation was cleared from within the approximate limits of Areas 3, 5, 6, 10, and the sand borrow area. Tree trunks, limbs, and brush less than approximately 8 inches in diameter were chipped on site, and stored in a pile outside of the work area. Trunks greater than 8 inches in diameter were shipped off site for commercial sale by Dan Reed Logging Co. All tree stumps were removed from the work areas and were shipped off site for chipping/recycling by New England Recycling, a subsidiary of G. Lopes Construction.

As described in the RAM Plan, the perimeter could not be accessed through the thick vegetation prior to clearing. The siltation barrier was installed around the southern, western, and northern limits of Area 10 (consolidation area) immediately after clearing.

3.4 Material Consolidation

The material encountered in Area 10 during remediation was the same as anticipated based on the 1995 test pit excavation and characterization program. The material consisted of soil, building demolition debris (brick, concrete, wood, piping, asphalt shingles, etc.), coal ash, textile debris, and abandoned equipment. The material was judged, based on visual inspection, suitable to remain on site within the consolidation area, except as discussed in Section 3.5.

The majority of material had been placed in piles on the north side of a former cart road that ran the length of Area 10, and extended to an area northeast of the elevated concrete pad, as shown on Drawing C-3. Debris was also scattered to the south of the cart road in Area 10. Material deposited in Areas 3, 5, and 6 consisted of soil excavated from Lagoon 1 and from the former dyehouse trench to Lagoon 1.

The material in Area 10 was moved with a tracked excavator, front end loader, and a bulldozer in a manner that allowed visual inspection of the debris and separation of material that was deemed unsuitable for onsite consolidation. The work was sequenced so that all material piled above the base grades of Area 10 was moved and inspected at least once. Where unsuitable material, such as timbers and equipment, extended below the base grade, the excavation was continued to remove that material from Area 10. After each section of Area 10 was excavated to the base grade, CDM surveyed surface elevations to estimate the volume of material moved.

The process of moving, visually inspecting and regrading was completed for all of Area 10 in sections. Once the subgrade of a section had been surveyed and inspected, material judged to be suitable to remain on site was pushed back and graded within the limits of the final consolidation area. Material north and east of the concrete pad located in Area 10, but outside the consolidation area, was pushed, inspected, and graded within the limits of the consolidation area. All the material excavated from Areas 3, 5, and 6 (predominantly soil mixed with textile fiber)

was judged suitable to remain on site, and was also placed in the consolidation area in Area 10. The consolidated material was then graded to a thickness of approximately three feet. CDM surveyed surface elevations and calculated that approximately 4,550 cubic yards of material was placed within the limits of the consolidation area.

All textile processing equipment debris, large timbers, and concrete blocks were segregated and stockpiled out of the work area. This material will be disposed of coincident with demolition of the buildings, at a later date.

3.5 Off-site Disposal

3.5.1 Test Pit 10 Material

Material in the vicinity of Test Pit 10 (1995 site investigation numbering) in Area 10 was designated for off-site disposal because the material contained chromium and lead at 1,900 mg/kg and 5,000 mg/kg, respectively. This material was visually distinct from surrounding material due to its reddish color. The soil had been stained red from oxidized metal shavings. On June 12, 1998, this material was excavated, stockpiled on a polyethylene liner outside the work area, and covered with polyethylene. On June 23, 1998, this material was transported to the Waste Management Turnkey Facility, Rochester, New Hampshire, for disposal. Nine trailers, with a total of 314.75 tons of material, were shipped under an MCP Bill of Lading (BOL). The original copy of the BOL was submitted to DEP on July 24, 1998.

3.5.2 Drums

Two drums, each partially filled with granular solid material, were uncovered and removed from Area 10 during the May and June 1998 remediation work.

B&M tentatively identified the white granular material from one drum as either sodium carbonate or sodium borate. CDM analyzed the material for boron by the Inductively Coupled Argon Plasma method, and found none. A dilute solution of the material was pH 9.3. Acidification to pH 5 initiated gas evolution, with strong gas evolution at pH 2. The pH and gas evolution suggest that the granular material is sodium bicarbonate, with a small portion of sodium carbonate.

B&M tentatively identified the glassy-flake material from the other drum as a polymeric adhesive, formerly applied to the back side of fabric products, or a solid plasticizer designed to be mixed with the adhesive. The material is not readily water soluble.

The contents of these drums will be disposed of by B&M.

3.5.3 Transite

On May 12, 1998, after a portion of the site was cleared, a small pile of corrugated transite panel scraps was discovered within the western end of Area 10. These 12 to 18 inch long pieces were likely trimmings from transite siding installed on B&M manufacturing buildings. The panels were suspected to contain asbestos. CDM made verbal notification to DEP on May 13, 1998. Additional transite panels were discovered on the concrete pad at the east end of Area 10 on May 15, 1998. Fleet filed an asbestos removal notification form with DEP on May 15, 1998.

Fleet removed the transite panels on June 2, 1998, after the 10 day waiting period (to allow the DEP opportunity to review the case) had passed. A total of 4 cubic yards of transite was transported to Elizabeth, PA for disposal at the Kelly Run Landfill, operated by United Waste Systems.

3.6 Cover Installation

After the consolidated material in Area 10 was graded, a geotextile fabric was placed over the material to separate it from the clean sand cover. Approximately 8,000 square yards of 70-mil #4551 non-woven geotextile fabric, manufactured by Amoco Fabrics and Fibers Co. and supplied by A.H. Harris & Sons, Inc., were installed.

The RAM Plan and construction specifications required a two foot, clean sand cover over the geotextile fabric. After the work was bid, CDM was advised by the DEP to provide three feet of clean fill over contaminated soils. This approach was consistent with DEP advice on similar sites. Consequently, a field change was made to increase the thickness of the clean sand layer to three feet. CDM estimates that approximately 6,000 cubic yards of clean sand from the on-site source was placed over the consolidated material in Area 10. The sand was graded to shed stormwater, with a crown running east-west. The 6,000 cubic yards includes the sand placed in a one foot layer over the area northeast of the concrete pad (outside the limits of the consolidation area), after debris from that area was moved to the consolidation area.

CDM surveyed the base, fill surface and cover surface elevations in Area 10 during remediation, and then calculated soil volumes with computer software. The computer analysis suggested that portions of the cover did not meet the three foot thickness requirement, despite placement of 6,000 cubic yards of sand. In September 1998, CDM excavated 22 test holes and confirmed that the cover was thin in some areas, as shown on Drawing C-3. Approximately 2,000 cubic yard of sand is needed to complete the three foot cover, prior to application of topsoil and seed. Completion of the cover is scheduled for early Spring 1999.

3.7 Soil Sampling and Analyses

CDM collected soil samples from the undisturbed subgrades in areas from which the contaminated material was removed. One sample was collected from each of Areas 3, 5, and 6, and two samples were collected from the area north and east of the concrete pad in Area 10. These areas are outside the limits of the consolidation area. The five samples were analyzed for

BUCKLEY MANN INC ANALYSIS OF SOIL SAMPLES FROM AREA REMEDIATED IN JUNE 1998 Samples from Areas 3, 5, 6 and 10 (outside of the 3-foot cover) TABLE 2

	MCP Metho	d I Standards	MCP Method I Standards MCP Method I Standards	1 Standards	Area 3 A3-01	Area 5 A5-01	Area 6 A6-01	Area 10 A 10-01	Area 10 A10-02	Area 10 Average
	S-1/GW-1	S-1/GW-3	S-2/GW-1	S-2/GW-3	11-Sep-98	11-Sep-98	11-Sep-98	11-Sep-98	11-Sep-98	11-Sep-98
	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	тg/kg	mg/kg	mg/kg	mg/kg
PAH Compounds					ND=<0.02	ND = < 0.19	ND = < 0.19	ND = < 0.22	ND = < 0.19	
Acenaphthene	20	1.000	20	2,500	QZ	Ð	0.53	2	QN.	QN
Acenaphthylene	100	100	100	1,000	QN	CN	QN	ND	R	S
Anthracene	1,000	1,000	2,500	2,500	QN	Q.	Q	0.26	0.33	0.30
Benzo(a)anthracene	0.7	0.7		_	QZ	QX	Q.	0.47	92.0	0.62
Benzo(b)fluoranthene	0.7	0.7	-	-	R	R	8	0.25	0.42	0.34
Benzo(k)fluoranthene	7	7	10	10	QN	R	QN	0.41	0.54	0.48
Benzo(g.h.i)perylene	1,000	1,000	2,500	2,500	見	8	Q	0.22	0.26	0.24
Benzo(a)pyrene	0.7	0.7	0.7	0.7	2	2	ND	0.44	0.65	0.55
Chrysene	7	7	10	10	QX	S	Q	0.50	0.73	0.62
Dibenzo(a,h)anthracene	0.7	0.7	0.7	0.7	£	QN	QN.	R	2	Q.
Fluoranthene	1,000	1,000	2,000	1,000	R	£	0.23	1.0	1.4	1.2
Fluorene	400	1,000	400	2,000	R	R	ND	QN.	2	£
Indeno(1,2,3-cd)pyrene	0.7	0.7	=	-	R	N ON	Ð	ND	0.26	S
2-Methylnaphthalene	4	200	4	1,000	QN	QX	R	Q	Q	QN
Naphthalene	4	100	4	1,000	R	9	Q	Q	R	R
Phenanthrene	700	100	700	100	Q.	2	Q	0.78	98.0	0.82
Pyrene	700	700	1,000	2,000	£	QN	0.20	0.84	1.0	6.0
Metals										
Chromium	1,000	1,000	2,500	2,500	260	650	460	29	350	190
Lead	300	300	009	009	6.6	24	19	150	32	91
Zinc	2,500	2,500	2,500	2,500	25	120	57	180	83	132

Samples were collected from the underlying soil after removal of contaminated soil.
With the exception of benzo (a) anthracene in a single sample from Area 10, all parameters for all samples were below the MCP S-1 standards. The benzo (a) anthracene in the Area 10 sample was only sighly above the standard, and the average of the two samples was below the standard.

lead, chromium, zinc, and PAHs. The results, summarized in Table 2, show that concentrations were all less than the MCP S-1 standards.

3.8 Variances from the RAM Plan

The RAM Plan included a provision for off-site disposal of material contained in 14 55-gallon drums filled with soils from Areas 4 and 7. The soils were thought to contain some dye paste and the RAM Plan called for disposal of the soil as non-hazardous waste and any dye paste as hazardous waste.

The drums were individually emptied onto a plastic sheet for inspection. The material in the drums consisted of soil and decomposed leaves, similar to the material from Area 5, with no dye paste. Consequently, the 2 to 3 cubic yards of material from the drums was placed in the consolidation area under the fabric and sand cover, rather than disposed of off-site.

5.0 WORK REMAINING TO COMPLETE THE RELEASE ABATEMENT MEASURE

The following tasks remain to complete the work in Area 10:

- Remove approximately 50 cubic yards of contaminated soil from Area 5 and place the material under the cover in the Area 10 consolidation area. This material was overlooked in the May and June remediation work.
- Complete the three foot consolidation area cover, by adding approximately 2,000 cubic yards additional sand cover, a loam layer and hydroseeding.
- Obtain a Certificate of Compliance from the Norfolk Conservation Commission.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.

SECTION VII

ACCESS AGREEMENT

Norfolk,	(STREET) MA	02056
(CITY/TOWN)	(STATE)	(ZIP CODE
Telephone Number: 508-528-0695	 	
Location of Property: 17 Lawrence	Street	
Norfolk,	(STREET) MA	02056
(CITY/TOWN)	(STATE)	(ZIP CODE)
Site ID Number: 3-0/73		
Site ID Number: 3-0/73 CCESS AGREEMENT: I agree to allow access to the prope	erty located at 17 Lawre	nce Street
CCESS AGREEMENT: I agree to allow access to the prope	,	STREET)
CCESS AGREEMENT: I agree to allow access to the prope	MA	STREET) 02056
CCESS AGREEMENT: I agree to allow access to the prope	MA (STATE)	STREET)

INTERIM SITE CLASSIFICATION FORM

CITY/TOWN Norfolk STATE MA	_ ZIP CODE 02056	State: MA	Zip Code: UZI4Z
LASSIFICATION SUM	<u>!</u>	FOR D	FOR DEQE USE
03	classification below:	DEQE Concurrence	ce Comment
Criterion No.	Insufficient	. Ys] ~
		。 -] [J L
2			<u></u>
3)	J
] [
5 X			
		1 1.] [
7			J L
8		1 -	<u> </u>
9		Department's Determination	S [
Recommended Site Classification:			
Priority Non-Priority Insuff		Priority Non-	Insufficient Information to Classify
Signature: Russel OML	- Date: 4/28/92	Approved by: So xin	of the town

INTERIM SITE CLASSIFICATION

Note: Check appropriate box for each criterion indicating whether a criterion is met or

cannot be classified as a non-priority disposal site if information is inadequate not met or if information is inadequate to determine whether a criterion is met. for any criterion. Only one of these three boxes should be checked for each criterion. A disposal site

Not Met × Criterion 1 is met if conditions at the disposal site provide the opportunity for direct contact with oil or hazardous materials via open lagoons, drum storage areas and sludges, or

Met

environmental receptors surface contamination at concentrations that could adversely affect human or surface oil or hazardous materials and there is evidence of, or data that indicate, If conditions at the disposal site provide the opportunity for direct contact with

Supporting Information and Source: Field visits in 1990 and 1991 showed that v

which would adversely affect human or environmental receptors. in 1990 and 1991 showed that wastewater sludges in Lagoons #1 and #2 had Soils still contain trace of dye carriers and metals, but not concentrations

Additional information is required to determine if Criterion 1 is met.

Describe

Me t	_ S
Not Met	Not Met

N Criterion 2 is met if there is evidence of or data that indicate the presence of phase in groundwater or surface water. uncontained migrating oil or hazardous materials which exist as a separate

Supporting Information and Source:

Reference: Report on an Environmental Site Assessment at Buckley and Mann, Inc., Norfolk, Separate phase contaminants were not observed in groundwater or surface water MA, dated July 1986.

Describe: Additional information is required to determine if Criterion 2 is met.

ယ Criterion 3 is met if there are data that indicate groundwater contamination with oil or hazardous materials at levels exceeding state or federal drinking water standards/guidelines (or detectable levels of contaminants for which there are not state/federal standards or guidelines) and

the data is based on samples taken from a location that:

- is within 2640 feet of a municipal water supply well(s), or
- is within a mapped cone of influence of a municipal water supply well(s), or
- supply well, is a private water supply well(s) or potentially affects a private water

unless there are data which indicate:

- that a hydrogeologic connection does not exist between the groundwater containing oil or hazardous materials and the municipal water supply
- that the identified concentrations of oil or hazardous materials, for which there are no drinking water standards or guidelines, are not and are not likely to be harmful to those drinking the water, or
- that the oil or hazardous materials have not migrated to and are not likely to migrate to public or private water supply well(s).

and Well #5 are over a mile away, the site is not within the cone of influence; 3) on-site did not exceed reportable concentrations for metals; 2) municipal water wells Franklin Well #4 Supporting Information and private wells are upgradient and are not impacted by site contamination. Report on an Environmental Site Assessment at Buckley and Mann Inc., Norfolk, Source: 1) Groundwater quality around wastewater lagoons

Describe Additional information is required to determine if Criterion 3 is met.

MA, dated July 1986.

	Met
П	Not
	Met

Criterion 4 is met if there is evidence of, or data that indicate that, a release of intake structure or of the recharge area of a municipal well(s), occurred and that the release is upstream of a potable surface water supply oil or hazardous materials at or from the disposal site into surface water has

unless there are data that indicate:

- that a hydrogeologic connection between the release of oil or hazardous materials into surface water and the recharge area does not exist, or
- =: State or Federal drinking water standard/guidelines, or supply intake or the municipal well have not and are not likely to exceed that concentrations of oil or hazardous materials at the surface water
- = to those drinking the water. supply intake or the municipal well(s), for which there are no drinking that concentrations of oil or hazardous materials at the surface water water standards or guidelines, are not and are not likely to be harmful

Supporting Information and Source:

Upstream and downstream sampling of surface water yielded similar, background metals concentrations and detected no volatile organic compounds.

Reference: Report on an Environmental Site Assessment at Buckley and Mann, Inc., July 1986.

Describe: Additional information is required to determine if Criterion 4 is met.

Not Met	Met Not Met
Criteria for the protection of aquatic life or human health. Supporting Information and Source: The Mill River passes through the site. The surface water quality measured downsteam of the site did not exceed Ambient Water Quality Criteria for the hazardous material constituents on the site. Reference: Report on an Environmental Site Assessment at Buckley and Mann, Inc., July, 1986. Additional information is required to determine if Criterion 5 is met. Describe: Supporting Information and Source: There is no free product at the site. TPH and Base Neutral Compounds in the soil do not pose a threat of fire or explosion. Report on an Environmental Site Assessment at Buckley and Mann, Inc., Report on an Environmental Site Assessment at Buckley and Mann, Inc., Report on an Environmental Site Assessment at Buckley and Mann, Inc., Report on an Environmental Site Assessment at Buckley and Mann, Inc., Report on an Environmental Site Assessment at Buckley and Mann, Inc., Report on an Environmental Site Assessment at Buckley and Mann, Inc., Report on an Environmental Site Assessment at Buckley and Mann, Inc., Report on an Environmental Site Assessment at Buckley and Mann, Inc., Status Report and Revised to determine if Criterion 6 is met	5. Criterion 5 is met if there is evidence of, or data that indicate that, a release of oil or hazardous materials at or from the disposal site to surface water has resulted or could result in a concentration which exceeds Ambient Water Quality

Describe:

		☐ Met				☐ st
		Not Met				Not Met
Additional information is required to determine if Criterion 8	Supporting Information and Source: Agricultural land and fish reserves are not impacted by the site.	 Criterion 8 is met if there is evidence of, or data that indicate oil or hazardous materials at or from the disposal site have at affect the human food chain. 	Additional information is required to determine if Criterion 7 is met. Describe:	There are no air emissions at the site.	Supporting Information and Source:	7. Criterion 7 is met if there is evidence, or data that indicate that there are or there could be air emissions at or from the disposal site which could adversely impact human or environmental receptors.
is met.		that indicate that, releases of site have affected or could	s met.			at there are or n could adversely

Describe:

	Mel
ធា	NOI
Ц	Me

9 previous eight criteria were met, and no additional information is required. state for several years. Note: This criterion is to be used only if none of the the disposal site may pose a significant or otherwise unacceptable risk of harm Criterion 9 is met if there are data or any other information that indicate that to health, safety, public welfare, or to the environment if left in its present

Supporting Information and Source:

its present state for several years. Much of the contaminated lagoon soil has been excavated and sampling of the stockpiled sludge in 1990 showed that natural degradation or unacceptable risk to health public welfare or the environment, if the site was left in of organic contaminants was in progress. It is unlikely that contaminants from the Buckley and Mann site would pose a significant

Reference: (1) Report on an Environmental Site Assessment at Buckley and Mann, Inc., Norfolk, MA. July 1986.

(2)Status Report and Revised Lagoon Closure Plan for Buckley and Mann, Inc., October 1990.



BWSC-106

SCANNED Release Tracking Number

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

3 - 0173

A. SITE LOCATION			
	: Buckley and Mann, Inc.	8 80 80	
Site Name: (optional)	17 Lawrence Street		Bush Pond
Street:		Location Aid:	02056
City/Town:	Norfolk, Massachusetts	ZIP Code:	02036
Check here if a Tie	r Classification Submittal has been provided to DEP for	or this Release Tracking	g Number.
Related Release Tracking	ng Numbers That This RAM or URAM Addresses:		
. THIS FORM IS B	EING USED TO: (check all that apply)	48.5 ************************************	
Submit a RAM Pla	n (complete Sections A, B, C, D, E, F, J, K, L and M).	•	
Check here if	this RAM Plan is an update or modification of a previous	ously approved written R	RAM Plan Date Subdition W/ 5
Submit a RAM Sta	itus Report (complete Sections A, B, C, E, J, K, L and	d M).	1000000
Submit a RAM Cor	mpletion Statement (complete Sections A, B, C, D, I	E, G, J, K, L and M).	
Confirm or Provide	URAM Notification (complete Sections A, B, H, K, L	and M).	MAY 28 1996 U
Submit a URAM S	tatus Report (complete Sections A, B, C, E, J, K, L a	ind M).	
	ompletion Statement (complete Sections A, B, C, D		DEP/NORTHEAST REGIO
. You	must attach all supporting documentation require	ed for each use of for	mindicated Mounting Bolles MASS.
. SITE CONDITION	any Legal Notices and Notices to Public	Officials required by	3 IU CMR 40.1400.
	source of the Release or Threat of Release is known.		×
If yes, check all so		na 🗆 ast 🗔	
			Drums Transformer Boat
			and and and there is a lamb was
Tanker Truck			
	eptors Affected: (check all that apply) Air	Groundwater	Surface Water Sediments X Soil
dentify Media and Rece	eptors Affected: (check all that apply) Air Storm Drain Paved Surface Pri	Groundwater	Surface Water Sediments X Soil
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BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

(6)	0170	
3	 01/3	

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D) D. DESCRIPTION OF RESPONSE ACTIONS (continued): Landfill © Cover Disposal Est. Vol.: cubic yards

100 to 300 for daily cover, 1000-2000 for disposa
Removal of Drums, Tanks or Containers **Groundwater Treatment Systems** Air Sparging Describe: 3 Drums with soil and dye paste **Temporary Water Supplies** Removal of Other Contaminated Media Temporary Evacuation or Relocation of Residents Specify Type and Volume: Fencing and Sign Posting Other Response Actions Describe: See 310 CMR 40.0442 for limitations on the scope and type of RAMs. See 310 CMR 40.0464 for performance standards for URAMs. Check here if this RAM or URAM involves the use of Innovative Technologies. DEP is interested in using this information to aid in creating an Innovative Technologies Clearinghouse. Describe Technologies: E. TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste has been sent to an off-site facility, answer the following questions) Name of Facility: Town and State: Quantity of Remediation Waste Transported to Date: Check here if this RAM Plan received previous oral approval from DEP as a continuation of a Limited Removal Action (LRA). Date of Oral Approval: If a RAM Compliance Fee is required, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. See 310 CMR 40.0444(2) to learn when a fee is not required. Check here if the RAM Plan is proposed for a Transition Site. If this is the case, you may need to attach an LSP Evaluation Opinion prior to undertaking the RAM, if not previously provided. See 310 CMR 40.0600 for further information about Transition Sites. Waiver G. RAM COMPLETION STATEMENT: If a RAM Compliance Fee is required in connection with submission of the RAM Completion Statement, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. You owe this fee when submitting a RAM Completion Statement if you received oral approval of a RAM that continued an LRA, and have NOT previously submitted a RAM Plan and accompanying fee. If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the RAM Completion Statement, you must submit a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the **RAM Completion Statement.** N/A H. URAM NOTIFICATION: Identify Location Type: (check all that apply) Public Right of Way **Utility Easement Private Property** Identify Utility Type: (check all that apply) Sanitary/Combined Sewerage Water Drainage Natural Gas Telephone Steam Lines Telecommunications Electric Specify: ___ Other Check here if you provided DEP with previous oral notification of this URAM. Date of Oral Notice: Check here if the property owner was NOT contacted prior to initiation of the URAM. If this is the case, you must attach an explanation of why the owner was not contacted, including the date and time when contact ultimately occurred. Check here if this URAM will occur in connection with the construction of new public utilities. If this is the case, document the nature and extent of encountered contamination, the scope and expense of necessary mitigation and the benefits amd limitations of project alternatives. With the exception stated below, the person undertaking the URAM must provide the name and license number of an LSP engaged or employed in connection with the URAM: LSP License Number: LSP information is not required if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by a Hazardous Material or a mixture of a Hazardous Material and Oil.



BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

-1	-		
3	-	0173	

Pursuant to 310 CMR 40.0	J444 - U440	and 310 CM	IK 40.046	2 - 0465	(Subpart D)	9 01/3
I. URAM COMPLETION STATEMENT: N/A	<u> </u>					-
Check here if this URAM was limited to the excave than 20 cubic yards of soil contaminated by either	ration and/or h r a Hazardous	andling of not i Material or a n	nore than a	100 cubic Hazardou	yards of soil contam is Material and Oil.	inated by Oil, or not more
If any Remediation Waste will be stored, treated Statement, you must submit either a Release A appropriate transmit	batement Me	asure (RAM)	Plan or a F	hase IV I	Remedy Implement	of the URAM Completion tation Plan, along with the
J. LSP OPINION:			***	** <u>**</u> *	7	
I attest under the pains and penalties of perjury that I it documents accompanying this submittal. In my profes 4.02(1), (ii) the applicable provisions of 309 CMR 4.02 information and belief,	sional opinion	and judgment	based upo	n applicat	ion of (i) the standar	d of care in 309 CMR
> if Section B of this form indicates that a Release At this submittal (i) has (have) been developed in accorda appropriate and reasonable to accomplish the purpose CMR 40.0000 and (iii) complies(y) with the identified p	ince with the a s of such resp	ipplicable provi conse action(s)	sions of M. as set fort	G.L. c. 21 h in the an	E and 310 CMR 40.	0000, (ii) is (are) of M.G.L. c. 21E and 310
> if Section B of this form indicates that a Release All is being submitted, the response action(s) that is (are) provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) set forth in the applicable provisions of M.G.L. c. 21E and approvals identified in this submittal;	the subject of) is (are) appro	this submittal opriate and reas	(i) is (are) to sonable to	eing implaccomplis	emented in accordar h the purposes of su	nce with the applicable
> if Section B of this form indicates that a Release At Completion Statement is being submitted, the responsing implemented in accordance with the applicable provision accomplish the purposes of such response action(s) a complies(y) with the identified provisions of all orders, it	nse action(s) t ons of M.G.L. is set forth in t	that is (are) the c. 21E and 310 the applicable p	subject of CMR 40.0 rovisions o	this subm 2000, (ii) is f M.G.L. c	ittal (i) has (have) be s (are) appropriate a c. 21E and 310 CMR	en developed and nd reasonable to
I am aware that significant penalties may result, including false, inaccurate or materially incomplete.						
Check here if the Response Action(s) on which the issued by DEP or EPA. If the box is checked, you	u MUST attac	based, if any, a th a statement i	re (were) s dentifying (he applica	able provisions there	of.
LSP Name: William R. Swanson	LSP#: _	6406	_ Stamp:	nie	TH OF MA	6 _
Telephone: 617-252-8000	Ext.:	8458	_	3/	WILLIAM R. SWANSON	A STATE OF THE STA
FAX: (optional) 617-621-2565				1	R.	SETTS
Signature: With Morn	R-		-	3		
Date: 5/9/96			_	3	No. 6406 POSTERED SITE PROFESSION	A CONTRACTOR OF THE PARTY OF TH
An LSP Opinion is no	at required fo	г a Utility-Rela	ated Abate	ment Me		
An LSP Opinion is not required for a URAM Com 100 cubic yards of soil contaminated by Oil	, or not more		yards of	soil cont		
K. PERSON UNDERTAKING RAM OR URA	M:		× **		*	<i>€</i>
Name of Organization: Buckley and Mann	Inc.	606 5456 W	, , ,			
Name of Contact: Richard Mann/Ste	phen Man	ın	_ Title: _	Own	iers	
Street: 14 Bush Pond Lan	е		⊆ 8			
City/Town: Norfolk			_ State: _	MA	ZIP Code:	02056
Telephone: 617-828-0029	Ext.:	X3427 SM X3442 RM	_ FAX: (o			
		AJYYA MI				

Check here if there has been a change in person undertaking the RAM or URAM.



BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking Number

0173

L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or	URAM: (c	check one)	_
X RP or PRP Specify: X Owner Operator Generator	Transporter (Other RP or PRP:	
Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by	M.G.L. c. 21E,	, s. 2)	
Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5	(I))	8	
Any Other Person Undertaking RAM or URAM Specify Relationship:			
M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM	:		
I, Richard Mann, attest under the pains familiar with the information contained in this submittal, including any and all docur of those individuals immediately responsible for obtaining the information, the mate knowledge and belief, true, accurate and complete, and (iii) that I am fully authorize this submittal. If the person or entity on whose behalf this submittal is made am/is a possible fines and imprisonment, for willfully submitting false, inaccurate, or income (signature) By: (signature) For: Buckley and Mann, Inc. (print name of person or entity recorded in Section K)	rial information ed to make this aware that there plete information	in your dissipation of the entity legally responsible for the station on behalf of the entity legally responsible for the	0
Enter address of person providing certification, if different from address recorded i	n Section K:		
Street: N/A			
City/Town:	State:	ZIP Code:	
Telephone: Ext.:			
YOU MUST COMPLETE ALL RELEVANT SECTIONS OF TH INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE F	IS FORM OF	R DEP MAY RETURN THE DOCUMENT AS	

A REQUIRED DEADLINE.

Revised 2/24/95

Messrs. Richard and Stephen Mann Buckley & Mann Incorporated 14 Bush Pond Road Norfolk, MA 02056

May 20 1996

Department of Environmental Protection Northeast Regional Office 10 Commerce Way Woburn, MA 01801

Subject: BWSC 3-0173

Buckley & Mann Inc certifies pursuant to 310 CMR 40.0442 (4) that it has sufficient financial resources to manage excavated materials, as part of a Release Abatement Measure, in the manner and time required by the Massachusetts Contingency Plan. For budgeting purposes, Buckley & Mann has made an allowance of \$100,000 for contaminated soil, as described in the attached Release Abatement Measure Plan and supporting report, the information and opinions in the Release Abatement Measure Plan were developed by William Swanson and Robert Dangel, Licensed Site Professionals with Camp Dresser & McKee Inc.

If you have questions, please contact us at 617 828 0029 extension 3442.

Buckley & Mann Inc.

President

Messrs. Richard and Stephen Mann Buckley & Mann Inc. 14 Bush Pond Rd. Norfolk, MA 02056

May 20, 1996

Department of Environmental Protection Northeast Regional Office 10 Commerce Way Woburn, MA 01801

Norfolk Conservation Commission Town Hall 100 Main St. Norfolk MA 02056

Town of Norfolk Board of Selectmen Town Hall 100 Main St. Norfolk, MA 02056

Town of Norfolk Zoning Board of Appeals town Hall 100 Main St. Norfolk, MA 02056

Attn: Gerald Hughs

Enclosed are documents related to a proposed Release Abatement Measure for the Buckley & Mann property in Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173.

If you have questions, please contact us at (617) 828 0029 X3442

Richard D. Mann

Buckley & Mann Incorporated

BUCKLEY & MANN, INC. 14 Bush Pond Road Norfolk, MA 02056 17 Lawrence St Norfolk SCANNET

March, 24, 1997

Department of Environmental Protection Northeast Regional Office 10 Commerce Way Woburn, MA 01801

Enclosed please find a 120 day Status Report for the Release Abatement Measure at the Buckley & Mann property in Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173.

If you have any questions, please contact either Stephen or Richard Mann at (617) 828-0029, X3427 or X3442.

Steple to ha



BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT

Release Tracking Number

DEP	Pursuant to 310 CMR 40	O. O T T T O 1 10			/ -	oupuit o ,	
. URAM COMPLE	TION STATEMENT:						
Check here if the	s URAM was limited to the exc rds of soil contaminated by eith	cavation and/or h her a Hazardous	nandling of not n Material or a m	nore than 100 ixture of a Ha	O cubic yar azardous N	ds of soil contam Naterial and Oil.	ninated by Oil, or not more
If any Remediation Statement, you n	on Waste will be stored, trea nust submit either a Release appropriate transn	Abatement Me	easure (RAM) F	Plan or a Pha	ase IV Rer	medy implemen	itation Plan, along with the
J. LSP OPINION:	10 10 10 10 10 10 10 10 10 10 10 10 10 1		- **				
documents accompa-	ns and penalties of perjury that nying this submittal. In my pro- able provisions of 309 CMR 4.	fessional opinior	n and judgment	based upon a	application	of (i) the standar	rd of care in 309 CMR
this submittal (i) has appropriate and reasi	form indicates that a Release (have) been developed in accordable to accomplish the purpo of complies(y) with the identified	rdance with the ses of such res	applicable provis	sions of M.G. as set forth i	L. c. 21E and the appli	and 310 CMR 40 cable provisions	0.0000, (ii) is (are) of M.G.L. c. 21E and 310
is being submitted, the	form indicates that a Release the response action(s) that is (at c. 21E and 310 CMR 40.0000, able provisions of M.G.L. c. 21 and in this submittal;	re) the subject o	f this submittal (ropriate and reas	(i) is (are) bei sonable to ac	ing implem complish t	ented in accorda the purposes of s	ince with the applicable such response action(s) as
Completion Statem	form indicates that a Release ent is being submitted, the res rdance with the applicable prov	ponse action(s)	that is (are) the	subject of th	is submitta 100. (ii) is (i	al (i) has (have) b are) appropriate :	een developed and and reasonable to
accomplish the purpo complies(y) with the	oses of such response action(s dentified provisions of all order	s) as set forth in rs, permits, and	the applicable papprovals identi	provisions of t fied in this su	M.G.L. c. 2 ubmittal;	21E and 310 CM	R 40.0000 and (iii)
accomplish the purpo complies(y) with the I am aware that signifalse, inaccurate or n	oses of such response action(s dentified provisions of all order ficant penalties may result, incl naterially incomplete.	s) as set forth in rs, permits, and luding, but not li th this opinion is	the applicable papprovals identi mited to, possib based, if any, a	provisions of the fied in this substitute fines and in the fines and in th	M.G.L. c. 2 ubmittal; mprisonme	21E and 310 CM ent, if I submit inf y order(s), permit	R 40.0000 and (iii) formation which I know to be (s) and/or approval(s)
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RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC. CAMBRIDGE, MASSACHUSETTS

March 1997

Robert A. Dangel Licensed Site Professional # 7798 William R. Swanson Licensed Site Professional # 6406

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT for BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

1. Previous filing

The RAM Plan was filed on May 28, 1996. The previous RAM Status report was filed in September 1996.

2. Work since the last report

Revised plans and specifications have been prepared for excavation and removal of contaminated soil from Areas 3, 4, 5, 6, 7, 10 and 12.

Preliminary cost estimates for the work have been solicited from vendors and a soil excavation, transport and disposal/reuse budget has been established.

3. Work planned

Buckley & Mann is resolving the funding mechanism for remediation.

