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25 April 2011
File No. 10063-066

Massachusetts Department of Environmental Protection
205B Lowell Street
Wilmington, Massachusetts 01887

Attention: Jack Miano

Subject: W.R. Grace & Co.-Conn.
62 Whittemore Avenue, One Alewife Center, and
134 Alewife Brook Parkway
Cambridge, Massachusetts
RTNs 3-0277 and 3-3411

Dear Mr. Miano:

On behalf of W.R. Grace & Co.-Conn., we are providing this letter to document our understanding on the applicability of and expectations for an Asbestos Notification Form (ANF-001) for soil excavation activities at the subject property.

The City of Cambridge recently completed soil excavation work associated with a separation of combined sewer overflow project on the 62 Whittemore Avenue property under a Release Abatement Measure (RAM) Plan which was submitted to the Massachusetts Department of Environmental Protection (MassDEP) on 14 March 2011 by the City's LSP Richard Quatemen. The City of Cambridge decided to submit an Asbestos Notification Form ANF-001 form for this work.

We understand that the ANF-001 is regulated under 310 CMR 7.00 which applies to the removal of "asbestos containing material" defined to be "friable asbestos and any material containing 1% or more asbestos by area". Extensive sampling and analysis for asbestos in soil has been completed at the W.R. Grace & Co.-Conn. Site as summarized in the Class A-3 Response Action Outcome (RAO) Statement, dated 13 March 2006. A total of 906 soil and split soil samples were collected at the Site since May 1998. Of the 906 samples analyzed, 857 were analyzed by Polarized Light Microscopy (PLM) and 49 were analyzed by Transmission Electron Microscopy (TEM). Results of the PLM analysis indicated that 82% of the samples contained no visible asbestos, 9% contained "trace" levels of asbestos (less than 1%), and 9% contained asbestos at a concentration of 1% or more. Results of the TEM analysis indicated that 63% of the samples contained no asbestos material, 25% contained "trace" levels of asbestos, and 12% contained asbestos at a concentration of 1% or more.

Since submittal of the Class C RAO in March 2006, soil excavations completed for emergency utility repairs, have been conducted under four separate URAMs which were orally approved by MassDEP. ANF-001 forms were not required for soil excavation activities associated with these URAMs. Asbestos containing materials were not encountered during these excavation activities and perimeter air sampling and analysis did not result in the detection of asbestos fibers in air.

Based on the information provided above, it is our opinion that the ANF-001 is not applicable to soil excavation activities associated with utility repairs at the Site and we do not anticipate filing them in the future for similar activities conducted under URAMs. If conditions change and/or asbestos containing material is encountered at the Site, an ANF-001 would be filed in accordance with applicable regulations.

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Please contact the undersigned if you have any questions.

Sincerely yours,
HALEY & ALDRICH, INC.

A handwritten signature in black ink, appearing to read 'John R. Kastrinos', is centered on a light gray rectangular background.

John R. Kastrinos, P.G., LSP
Vice President

c: W.R. Grace & Co.-Conn

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