

Final Immediate Response Action Plan, Building 3 Area Asbestos

Version: Final

Former Varian Facility Site, 150 Sohier Road, Beverly, Massachusetts 01915
MassDEP RTN: 3-38666

June 20, 2024

Jacobs Solutions Inc.

120 St. James Avenue
5th Floor
Boston, MA 02116
United States

T +1.617.242.9222
F +1.617.242.9824
www.jacobs.com

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Acronyms and abbreviations

ACWM	asbestos-containing waste material
IRA	Immediate Response Action
BAW	Bureau of Air and Waste
BWSC	Bureau of Waste Site Cleanup
CPI	Communications & Power Industries, Inc.
EPA	U.S. Environmental Protection Agency
f/cc	fibers per cubic centimeter
IRIS	Integrated Risk Information System
ISTR	in situ thermal remediation
MassDEP	Massachusetts Department of Environmental Protection
MCP	Massachusetts Contingency Plan
NTWP	non-traditional work plan
OHM	oil and/or hazardous material
PIP	Public Involvement Plan
RA	remedial alternative
RTN	Tracking Number
TRV	toxicity reference values
Varian	Varian Medical Systems, Inc.

1. Introduction

This Final Immediate Response Action (IRA) Plan was prepared by Jacobs Solutions Inc. (Jacobs) on behalf of Varian Medical Systems, Inc. (Varian) in accordance with the Massachusetts Contingency Plan (MCP) (Section 310 Code of Massachusetts Regulations [CMR] 40,0000) for the Former Varian Facility Site located at 150 Sohier Road, Beverly, Massachusetts. This report documents the IRA for asbestos-containing waste material (ACWM) (pieces of board containing asbestos) discovered during construction work for the Building 3 Source Area remedial alternative (RA). Within this report, the term "Site" is used in accordance with the MCP, being any place or area where ACWM is located at the former Varian facility. The "facility" refers to Varian's former facility property. The Site location is shown on Figure 1-1. This asbestos release has been assigned Release Tracking Number (RTN) 3-38666 by Massachusetts Department of Environmental Protection (MassDEP). This RTN applies to the limited area adjacent to Building 3 as described below.

MassDEP was orally notified on March 6, 2024, of the presence of ACWM in buried debris discovered while hand clearing for well installation that was being conducted as part of the RA (in situ thermal remediation [ISTR]) activities. Installation of the ISTR is part of the remediation of volatile organic compounds under a separate RTN (RTN 3-0485). The discovery of ACWM material buried in soil constitutes a release which requires notification to MassDEP within two hours and, as such, an IRA must be prepared. An IRA Plan was prepared and submitted in accordance with Section 310 CMR 40.0424 of the MCP on May 6, 2024. This Final IRA Plan includes the final non-traditional work plan (NTWP) approved by MassDEP. Appendix A of this plan includes a copy of the MassDEP Bureau of Waste Site Cleanup (BWSC) transmittal form for this Final IRA plan (BWSC-105).

RTN 3-0485 is an active Public Involvement Plan (PIP) site under the MCP. Therefore, a copy of this report will be sent to the information repository established for the Former Varian Facility Site and notice of availability will be issued to the PIP mailing list. In addition, the May 6, 2024, IRA Plan underwent a 20-day public comment period, which started on May 13, 2024. During this period, no public comments were received. The IRA Plan was previously presented at a public meeting on April 3, 2024.

1.1 Statement of Purpose and Report Organization

In accordance with 310 CMR 40.0411, an IRA shall assess a release, threat of release and/or site conditions and, where appropriate, contain, isolate, remove or secure a release or threat of release of oil and/or hazardous material (OHM) in order to:

- Abate, prevent, or eliminate an Imminent Hazard to health, safety, public welfare, or the environment; and/or
- Respond to other time-critical releases, threats of release and/or site conditions.

The asbestos IRA plan has been developed in accordance with Section 310 CMR 40.0424 of the MCP. The report organization is shown in Table 1-1.

Table 1-1. Report Organization

310 CMR	Description of Section	Report Section
40.0424(1)(b)	Description of the release, site conditions, and surrounding receptors	2
40.0424(1)(d)	Reason why an IRA is required	2
40.0424(1)(a)	Person assuming responsibility for the IRA	3
40.0424(1)(c)	IRAs undertaken to date at the site	4
40.0414(1)(a)	Degree of hazard posed by release	5
40.0424(1)(e)	Objective, plans, and proposed schedule for the IRA	6
40.0424(1)(f)	Statement as to whether Remediation Waste will be excavated, collected, stored, treated, or re-used at the site	6, Appendix C
40.0424(1)(g)	If appropriate, proposed monitoring plan for implementation during and/or after the IRA	6, Appendix C
40.0424(1)(h)	List of federal, state, or local permits needed to conduct IRA	6.1
40.0424(1)(i)	Signature of a Licensed Site Professional (LSP)	7
40.0424(1)(j)	Other information as MassDEP may deem appropriate and necessary	Not applicable

2. Description of Release, Site Conditions, and Surrounding Receptors (310 CMR 40.0424(1)(b))

This section describes the Site conditions and surrounding receptors and general history pertaining to the release of ACWM.

2.1 Site Conditions and Surrounding Receptors

The former Varian facility (150 Sohier Road) is currently owned and operated by Communications & Power Industries, Inc. (CPI). The facility comprises approximately 24 acres of land and contains two large complexes of buildings. Sohier Road and undeveloped land abut the facility to the northeast. Across Sohier Road to the southeast is an apartment complex (Northridge Homes; 70 Northridge Rd), and south of the facility is Life Storage (130 Sohier Rd). West of the facility is the Hopeful Journeys Education Center (28 Tozer Rd), a medical office building (30 Tozer Rd), and a commercial property (32 Tozer Rd). Tozer Road, additional commercial properties, and railroad tracks are located further to the west, with a residential area located across the railroad tracks. The northern portion of the facility abuts Route 128. Northwest of the facility. Across Route 128 is a United States Postal Service facility (16 Tozer Rd). North of the postal facility, also across Route 128, is the residential area associated with Mark Road. The southern portion of the facility contains a field and paved parking area. The central portion of the facility includes the Building 5 complex (Buildings 5, 5A, and 8). North of this building network is a flat, paved parking area, and to the northwest is the Building 3 complex (Buildings 1, 2, 3, 4, and 6). Northeast of the Building 3 complex is a wastewater treatment plant. West of the Building 3 complex is the former Building 7, now operated as Kelly Classics and Restoration. Bomac Road (formerly Salem Water Works Road) traverses the facility from the southeast to the northwest between Building 7 and the main building complexes. Figure 2-1 depicts the 150 Sohier Rd facility and surrounding areas.

At the northeast corner of the facility property, stormwater from the abutting roads, areas to the north, and from an area across Sohier Road to the east drains into a stream known as the Unnamed Stream (Figure 2-1). The Unnamed Stream, which is partially culverted, flows west from the facility and then turns in a southerly direction between buildings located on 28 and 30 Tozer Road. From this point, it flows along Tozer Road in a channel with overgrown vegetation along its banks. The stream passes through a culvert below Tozer Road and past a small wetland area. At this point, it joins with another stream (Stream A) flowing in from the northwest.

2.2 Description of Release

As part of remedial activities under RTN 3-0485, ISTR has been chosen as the remedial action alternative for the Building 3 Source Area. ISTR involves installing heating elements into the ground and heating groundwater to its boiling point. ISTR installation activities are currently ongoing in the Building 3 Source Area and involve the installation of soil borings and thermal treatment wells adjacent to and under Building 3.

While hand clearing for the thermal treatment well installation adjacent to Building 3, the field crew encountered buried debris in a limited area that was suspected to be ACWM (pieces of cement board containing asbestos) at approximately three feet below grade immediately adjacent to the building (see Figure 2-2). The field team backed away from the area, covered the material with 6- mil polyethylene sheeting, and arranged for sampling. At the time this material was encountered, it was raining, so the suspected ACWM was wet, and there was no visible dust generated during the hand-clearing activity. The extent of the material appears to be limited to approximately four cubic yards located within three feet of

the building foundation. Photographs of the ACWM are provided in Figure 2-3. The ACWM was likely part of the fill material placed at this location during building construction in approximately 1953.

Samples of the suspected ACWM were collected and submitted for analysis. Sample results were received on March 5, 2024, and indicated a composition of 18% chrysotile (asbestos) and 82% non-fibrous material (non asbestos) (Appendix B). MassDEP was orally notified of the confirmed presence of ACWM on March 6, 2024. The presence of ACWM constituted a release which requires notification to MassDEP within two hours. MassDEP approved the preparation and submittal of a NTWP to properly remove the ACWM.

The NTWP was submitted to MassDEP Bureau of Air and Waste (BAW) on April 16, 2024. MassDEP BAW issued comments on the NTWP on May 20, 2024, and a revised NTWP was submitted on May 30, 2024. Additional comments were issued by MassDEP BAW on June 3, 2024, and a second revision of the NTWP was submitted on June 6, 2024, which was approved by MassDEP BAW on June 17, 2024. A copy of the final NTWP and MassDEP BAW's approval of the plan are provided in Appendix C.

As outlined in the Notification Of Responsibility received from MassDEP on March 22, 2024, an IRA is necessary to respond to the ACWM released at the Varian site (MassDEP 2024).

3. Person Assuming Responsibility for the IRA (310 CMR 40.0424(1)(a))

Varian is the responsible party undertaking the asbestos IRA.

The contact person for Varian is:

Matthew Gillis
Environmental Affairs Program Manager
Varian Medical Systems, Inc.
801 Pennsylvania Avenue NW
Washington, DC 20004
Phone: 410-459-1710

The LSP for this IRA is:

Matthew E. Hackman
LSP Number 9456
97 Asylum Road
Warwick, Rhode Island 02886-8001
Office Phone: 401-737-9211
Cell: (401) 556-2264
Email: matthewehackman@verizon.net

4. IRA Activities Conducted to Date (310 CMR 40.0424(1)(c))

As noted in Section 2, the ACWM has been submitted for testing (Appendix B) and the excavation in which the ACWM was discovered has been covered with two layers of 6-mil polyethylene sheeting. The ACWM area has remained isolated and secure. In addition, a licensed Massachusetts Asbestos Project Designer (Axiom Partners, Inc., [AXIOM]) was contracted to generate a NTWP for removal of the ACWM (Appendix C) and a licensed asbestos abatement contractor has been selected to conduct the ACWM removal.

5. Degree of Hazard Associated with Release (310 CMR 40.0414(1)(a))

As part of the IRA plan, the degree of hazard posed by the presence of ACWM at the Site must be assessed. In addition, assessment actions shall be sufficient for determining: the degree of hazard posed by the release; whether remedial actions are required prior to the completion of a Phase IV Remedy Implementation Plan; and where appropriate, the nature, extent, and timing of any required removal or containment actions (310 CMR 40.0414(1)).

When evaluating whether a hazard to human health is possible, three factors must be present for an adverse health effect to occur:

- The chemical must be present at concentrations sufficient to cause a possible adverse effect;
- A receptor must be present; and
- There must be a complete exposure pathway by which the receptor can make contact with the chemical.

The following subsections describe these three factors and their significance with respect to the ACWM in buried soil at the Site.

5.1 Hazard Identification

As noted in Section 2.2, ACWM was encountered at approximately three feet below ground surface (bgs). The extent of the material appears to be limited to approximately four cubic yards located within three feet of the building foundation. Sample results indicate the ACWM is 18% chrysotile (asbestos) and 82% non-fibrous (non-asbestos) material.

5.2 Dose Response Evaluation

Asbestos is a known carcinogen (lung cancer and mesothelioma) via the inhalation route of exposure. Non-cancer health effects (respiratory and cardiovascular) are also possible via inhalation (EPA 2020). Toxicity reference values (TRVs) are readily available from the Environmental Protection Agency (EPA) Integrated Risk Information System (IRIS) (EPA 1998, 2014) to assess cancer risks from general asbestos (including chrysotile), but non-cancer values are only available for a specific sub-type of asbestos (that was not found to be present at the Site). The TRVs are based on data from human occupational exposures.

5.3 Exposure Assessment

This section describes in the current and foreseeable future use of the property and receptor identification and pathways of exposure. The ACWM is not expected to pose a hazard to groundwater or the environment. Human health exposure via inhalation is typically the dominant pathway of concern for exposed asbestos, and the ACWM has been buried at approximately three feet bgs. It was immediately covered and will only be exposed during the asbestos removal activities described in the Non-Traditional Work Plan (NTWP, Appendix C), which will be performed by licensed asbestos workers under the supervision of a licensed Asbestos Project Monitor.

5.3.1 Current and Foreseeable Future Use of the Property

The current property use is described in Section 2.1. There are currently no anticipated changes to property use.

5.3.2 Receptor Identification and Pathways of Exposure

The ACWM is currently covered with up to three feet of soil or two layers of 6-mil polyethylene sheeting. The current potential receptors are Site workers and construction workers in the vicinity of Building 3. ACWM awareness and maintaining the poly sheeting cover are topics covered in the crew's regular safety briefings. There are residential properties within 500 feet of the ACWM release. These are located to the north, past the facility fence and across Route 128. Access to the work area where the ACWM is located is currently restricted to construction personnel and, therefore, residential direct contact exposure is considered unlikely. Furthermore, the ACWM removal under this IRA/NTWP includes provisions to prevent creation of airborne asbestos particles that could travel to residential receptors. As the excavated area with ACWM has remained covered, there has been no ongoing exposure to the ACWM and the exposure pathway is considered incomplete.

5.3.3 Exposure Point Locations, Concentrations, and Estimates

Exposure point means a location of potential contact between a human or environmental receptor and a release of OHM. An Exposure Point may describe an area or zone of potential exposure, as well as a single discrete point. For this ACWM release, the exposure point location is the excavation area adjacent to Building 3 which contains ACWM.

Exposure Point Concentration means the concentration of OHM in a specific medium which a human or environmental receptor may contact at an Exposure Point. For this ACWM release, the ACWM is 18% chrysotile. Exposure to ACWM is typically expressed in terms of the concentration of asbestos in air; for example, fibers per cubic centimeter (f/cc). Air monitoring at the release Site has not been completed (nor considered warranted under the conditions). Given that it was raining during the initial discovery of the ACWM and that prompt identification and action was taken to minimize further disturbance of the ACWM (i.e., work was immediately ceased and the material was covered with 6-mil polyethylene sheeting), exposure to airborne asbestos fibers at the time of discovery was likely to be negligible. The ACWM remains covered; therefore, the exposure pathway will remain "blocked" (i.e., no exposure) until the ACWM can be appropriately removed by a licensed asbestos removal contractor (Prism Response, LLC; [PRISM]) under a MassDEP BAW-approved NTWP.

5.3.4 Risk Characterization

Risk characterization integrates the toxicity (dose-response) and exposure information to determine the potential for adverse health effects. Under the current conditions, the exposure pathway to the ACWM is being blocked. In the absence of a complete exposure pathway, there cannot be a risk (i.e., an adverse health effect), even if both the ACWM and receptors remain present at the Site. Although the ACWM does not pose an Imminent Hazard under the current conditions, the ACWM will be removed as described in Section 6.

6. Objective, plans, and proposed schedule for the IRA (310 CMR 40.0424(1)(e))

The objectives of this IRA plan are:

- Determine the degree of hazard posed by the asbestos release; and
- Conduct mitigation measures to ensure there is no Imminent Hazard health, safety, public welfare or the environment.

To achieve these objectives, the following activities are planned:

- Maintain cover of the excavation area where ACWM was encountered so there is no exposure to current Site workers to the ACWM.
- Restrict access to the area where subsurface ACWM was identified to prevent exposure to Site workers, including CPI employees as well as Jacobs' or their subcontractors employees.
- Contract a licensed Massachusetts Asbestos Project Designer (AXIOM) to prepare an NTWP (Appendix C) to remove the ACWM.
- Contract a licensed asbestos removal contractor (PRISM) to conduct the ACWM removal:
 - Per 310 CMR 40.0424(1)(f) a statement as to whether Remediation Waste will be excavated, collected, stored, treated, or re-used at the site shall be included in the IRA Plan. Remediation Waste (ACWM) will be excavated, as detailed in the NTWP (Appendix C).
 - Per 310 CMR 40.0424(1)(g), if appropriate, the proposed monitoring plan for implementation during and/or after the IRA shall be included in the IRA Plan. Proposed monitoring during IRA activities include air monitoring, as detailed in Section F of the NTWP (Appendix C). Air monitoring results will be compared to the Massachusetts Department of Labor Standard post-abatement release criteria of 0.01 f/cc and will be emailed to MassDEP daily.
- Confirm the extent of ACWM has been identified and removed. As detailed in Section F of the NTWP (Appendix C): "The APM will perform a final visual inspection after the completion of work operations in the regulated area. A visual inspection shall be conducted to ensure all materials have been removed and no visible ACWM debris remains. Soil removal (and disposal as ACWM) shall continue in increments of at least 1" until the onsite project monitor makes a "no visible debris" determination."

If IRA activities have not been completed by July 4, 2024 (120 days from the release notification on March 6, 2024), an IRA Status Report will be submitted and IRA activities will continue. When IRA activities are complete, an IRA Completion Report will be prepared and the RTN associated with the asbestos release (3-38666) will be linked to the 150 Sohier Road "parent" RTN (3-0485).

6.1 Permits (310 CMR 40.0424(1)(h))

As noted in Section 1.1, RTN 3-0485 is an active PIP site under the MCP. Therefore, the May 6, 2024, IRA Plan underwent a 20-day public comment period, which started on May 13, 2024. No public comments were received.

MassDEP BAW approved the NTWP on June 17, 2024. The final NTWP and approval are included as Appendix C. Since written approval of the NTWP has been received, we understand that MassDEP BWSC will review and issue approval of the Final IRA Plan.

6.2 Schedule of Proposed IRA Activities

Once approval of the Final IRA Plan is received from MassDEP BWSC, the ACWM removal will be scheduled. As required by MassDEP BAW, a pre-abatement inspection will be conducted once all requirements of the NTWP are onsite, setup, and in place. Following this inspection, removal activities are anticipated to take approximately one week.

7. Licensed Site Professional Statement and Opinion (310 CMR 40.0424(1)(i))

The LSP Opinion is in Section E of the attached transmittal form (BWSC-105).

8. References

Massachusetts Department of Environmental Protection (MassDEP). 2024. Notice of Responsibility; MGL c. 21E & 310 CMR 40.0000. Letter from Kyle MacAfee (MassDEP) to Mathew Gillis (Varian). March 22.


U.S. Environmental Protection Agency (EPA). 1998. Integrated Risk Information System (IRIS), Chemical Assessment Summary, Asbestos; CARSN 1332-21-4. Accessed April 2024: https://iris.epa.gov/static/pdfs/0371_summary.pdf

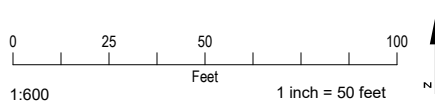
U.S. Environmental Protection Agency (EPA). 2014. Integrated Risk Information System (IRIS), Chemical Assessment Summary, Libby Amphibole asbestos; CARSN Not Available. Accessed April 2024: https://iris.epa.gov/static/pdfs/1026_summary.pdf

U.S. Environmental Protection Agency (EPA). 2020. Risk Evaluation for Asbestos, Part 1: Chrysotile Asbestos. Accessed April 2024: https://www.epa.gov/sites/default/files/2020-12/documents/1_risk_evaluation_for_asbestos_part_1_chrysotile_asbestos.pdf



LEGEND

 Asbestos Area



Service Layer Credits: World Street Map: Esri, HERE, Garmin, NGA, USGS, NPS
World Transportation: Esri, HERE, Garmin, (c) OpenStreetMap contributors
Bing Maps Aerial: © 2024 Microsoft Corporation © 2024 Maxar © CNES (2024) Distribution Airbus DS

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VICINITY MAP

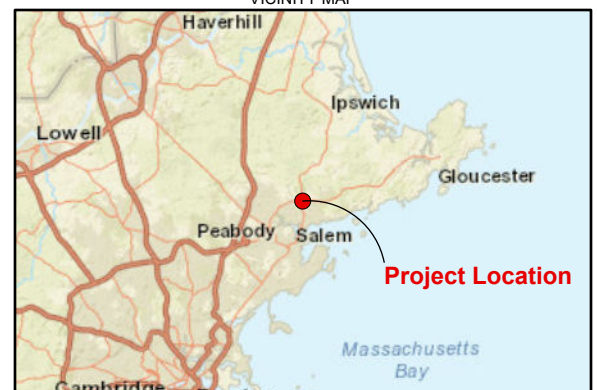


FIGURE 2-2
Location of Asbestos Containing Material
Asbestos Immediate Response Action Plan
Beverly, Massachusetts



Asbestos containing material (ACM) encountered at approximately 3 feet deep.



Side wall of excavation showing ACM imbedded in soil.



Close up of ACM.



Close up of ACM.



ACM area covered by tarp.

FIGURE 2-3
Photographs of Asbestos Containing Material
Discovered During Well Installation
 Asbestos Immediate Response Action Plan
 Beverly, Massachusetts

Appendix A. BWSC Form Immediate Response Actions (BWSC-105)



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 105

Immediate Response Action (IRA) Transmittal Form

Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 38666

A. SITE LOCATION:

1. Release Name/Location Aid: NORTHEAST CORNER OF SITE
2. Street Address: 150 SOHIER ROAD
3. City/Town: BEVERLY 4. Zip Code: 019150000
- ☐ 5. Check here if this location is Adequately Regulated, pursuant to 310 CMR 40.0110-0114.
- ☐ a. CERCLA ☐ b. HSWA Corrective Action ☐ c. Solid Waste Management
- ☐ d. RCRA State Program (21C Facilities)

B. THIS FORM IS BEING USED TO: (check all that apply)

1. List Submittal Date of Initial IRA Written Plan (if previously submitted): 5/6/2024
- ☐ 2. Submit an **Initial IRA Plan**.
- ☒ 3. Submit a **Revised IRA Plan** of a previously submitted written IRA Plan.
- ☐ 4. Submit an **Imminent Hazard Evaluation**. (check one)
- ☐ a. An Imminent Hazard exists in connection with this Release or Threat of Release.
- ☐ b. An Imminent Hazard does exist in connection with this Release or Threat of Release.
- ☐ c. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release, and further assessment activities will be undertaken.
- ☐ d. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release. However, response actions will address those conditions that could pose an Imminent Hazard.
- ☐ 5. Submit a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard**.
- ☐ 6. Submit an **IRA Status Report**
- ☐ 7. Submit a **Remedial Monitoring Report**. (This report can only be submitted through eDEP.)
- a. Type of Report: (check one) ☐ i. Initial Report ☐ ii. Interim Report ☐ iii. Final Report
- b. Frequency of Submittal: (check all that apply)
- ☐ i. A Remedial Monitoring Report(s) submitted monthly to address an Imminent Hazard.
- ☐ ii. A Remedial Monitoring Report(s) submitted monthly to address a Condition of Substantial Release Migration.
- ☐ iii. A Remedial Monitoring Report(s) submitted every six months, concurrent with an IRA Status Report.
- ☐ iv. A Remedial Monitoring Report(s) submitted annually, concurrent with an IRA Status Report.
- c. Number of Remedial Systems, Active Exposure Pathway Mitigation Measures and/or Monitoring Programs: _____
- A separate BWSC105A, IRA Remedial Monitoring Report, must be filled out for each Remedial System and/or Monitoring Program addressed by this transmittal form.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 105

Immediate Response Action (IRA) Transmittal Form

Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 38666

☐ 8. Submit an **IRA Completion Statement**.

☐ a. Check here if future response actions addressing this Release or Threat of Release notification condition will be conducted as part of the Response Actions planned or ongoing at a Site that has already been Tier Classified under a different Release Tracking Number (RTN)

b. Provide Release Tracking Number of Tier Classified Site (Primary RTN): _____

These additional response actions must occur according to the deadlines applicable to the Primary RTN. Use the Primary RTN when making all future submittals for the site unless specifically relating to this Immediate Response Action.

☐ 9. Submit a **Revised IRA Completion Statement**.

☐ 10. Submit a **Plan for the Application of Remedial Additives** near a sensitive receptor, pursuant to 310 CMR 40.0046(3).

(All sections of this transmittal form must be filled out unless otherwise noted above)

C. RELEASE OR THREAT OF RELEASE (TOR) CONDITIONS THAT WARRANT IRA:

1. Media Impacted and Receptors Affected: (check all that apply)

- | | | |
|---|---|---|
| <input type="checkbox"/> a. Paved Surface | <input type="checkbox"/> b. Basement | <input type="checkbox"/> c. School |
| <input type="checkbox"/> d. Public Water Supply | <input type="checkbox"/> e. Surface Water | <input type="checkbox"/> f. Zone 2 |
| <input type="checkbox"/> g. Private Well | <input type="checkbox"/> h. Residence | <input checked="" type="checkbox"/> i. Soil |
| <input type="checkbox"/> j. Groundwater | <input type="checkbox"/> k. Sediments | <input type="checkbox"/> l. Wetland |
| <input type="checkbox"/> m. Storm Drain | <input type="checkbox"/> n. Indoor Air | <input type="checkbox"/> o. Air |
| <input type="checkbox"/> p. Soil Gas | <input type="checkbox"/> q. Sub-Slab Soil Gas | <input type="checkbox"/> r. Critical Exposure Pathway |
| <input type="checkbox"/> s. NAPL | <input type="checkbox"/> t. Unknown | |
| <input type="checkbox"/> r. Others | Specify: _____ | |

2. Sources of the Release or TOR: (check all that apply)

- | | | |
|--|---|-----------------------------------|
| <input type="checkbox"/> a. Transformer | <input type="checkbox"/> b. Fuel Tank | <input type="checkbox"/> c. Pipe |
| <input type="checkbox"/> d. OHM Delivery | <input type="checkbox"/> e. AST | <input type="checkbox"/> f. Drums |
| <input type="checkbox"/> g. Tanker Truck | <input type="checkbox"/> h. Hose | <input type="checkbox"/> i. Line |
| <input type="checkbox"/> j. UST | Describe: _____ | |
| <input type="checkbox"/> k. Vehicle | <input type="checkbox"/> l. Boat/Vessel | |
| <input type="checkbox"/> m. Unknown | <input checked="" type="checkbox"/> n. Other: CONSTRUCTION DEBRIS | |

3. Type of Release or TOR: (check all that apply)

- | | | | |
|--|--|---|--------------------------------------|
| <input type="checkbox"/> a. Dumping | <input type="checkbox"/> b. Fire | <input type="checkbox"/> c. AST Removal | <input type="checkbox"/> d. Overfill |
| <input type="checkbox"/> e. Rupture | <input type="checkbox"/> f. Vehicle Accident | <input type="checkbox"/> g. Leak | <input type="checkbox"/> h. Spill |
| <input type="checkbox"/> i. Test failure | <input type="checkbox"/> j. TOR Only | | |
| <input type="checkbox"/> k. UST Removal | Describe: _____ | | |
| <input checked="" type="checkbox"/> l. Unknown | <input type="checkbox"/> m. Other: _____ | | |

4. Identify Oils and Hazardous Materials Released: (check all that apply)

- | | |
|--|--|
| <input type="checkbox"/> a. Oils | <input type="checkbox"/> b. Chlorinated Solvents |
| <input type="checkbox"/> c. Heavy Metals | <input checked="" type="checkbox"/> d. Others |
| Specify: ASBESTOS CONTAINING MATERIAL | |

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply, for volumes list cumulative amounts)

- | | |
|---|---|
| <input type="checkbox"/> 1. Assessment and/or Monitoring Only | <input checked="" type="checkbox"/> 2. Temporary Covers or Caps |
| <input type="checkbox"/> 3. Deployment of Absorbent or Containment Materials | <input type="checkbox"/> 4. Temporary Water Supplies |
| <input type="checkbox"/> 5. Structure Venting System/HVAC Modification System | <input type="checkbox"/> 6. Temporary Evacuation or Relocation of Residents |
| <input type="checkbox"/> 7. Product or NAPL Recovery | <input type="checkbox"/> 8. Fencing and Sign Posting |
| <input type="checkbox"/> 9. Groundwater Treatment Systems | <input type="checkbox"/> 10. Soil Vapor Extraction |
| <input type="checkbox"/> 11. Remedial Additives | <input type="checkbox"/> 12. Air Sparging |
| <input type="checkbox"/> 13. Active Exposure Pathway Mitigation System | <input type="checkbox"/> 14. Passive Exposure Pathway Mitigation System |



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 105

Immediate Response Action (IRA) Transmittal Form
Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 38666

D. DESCRIPTION OF RESPONSE ACTIONS: (cont.)

☒ 15. Excavation of Contaminated Soils.

☐ a. Re-use, Recycling or Treatment ☐ i. On Site Estimated volume in cubic yards _____

☐ ii. Off Site Estimated volume in cubic yards _____

iiia. Receiving Facility: _____ Town: _____ State: _____

iiib. Receiving Facility: _____ Town: _____ State: _____

iiic. Describe: _____

☐ b. Store ☐ i. On Site Estimated volume in cubic yards _____

☐ ii. Off Site Estimated volume in cubic yards _____

iiia. Receiving Facility: _____ Town: _____ State: _____

iiib. Receiving Facility: _____ Town: _____ State: _____

☒ c. Landfill ☐ i. Cover Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

☒ ii. Disposal Estimated volume in cubic yards 15

Receiving Facility: MINERVA ENTERPRISES Town: WAYNESBURG State: OH

☐ 16. Removal of Dams, Tanks, or Containers:

a. Describe Quantity and Amount: _____

b. Receiving Facility: _____ Town: _____ State: _____

c. Receiving Facility: _____ Town: _____ State: _____

☐ 17. Removal of Other Contaminated Media:

a. Specify Type and Volume: _____

☐ 18. Other Response Actions:

Describe: _____

☐ 19. Use of Innovative Technologies:

Describe: _____



Massachusetts Department of Environmental Protection
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Immediate Response Action (IRA) Transmittal Form

Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 38666

E. LSP SIGNATURE AND STAMP:

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 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B of this form indicates that an **Immediate Response Action Plan** is being submitted, the response action(s) 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 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;

> if Section B of this form indicates that an **Imminent Hazard Evaluation** is being submitted, this Imminent Hazard Evaluation was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and the assessment activity(ies) undertaken to support this Imminent Hazard Evaluation comply(ies) with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that an **Immediate Response Action Status Report** and/or a **Remedial Monitoring Report** 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 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) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Immediate Response Action Completion Statement** or a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard** 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) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I 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 false, inaccurate, or materially incomplete.

1. LSP #: 9456

2. First Name: MATTHEWE

3. Last Name: HACKMAN

4. Telephone: 401-737-9211

5. Ext:

6. Email: matthewehackman@verizon.net

7. Signature:

8. Date: (mm/dd/yyyy)

9. ST Stamp:



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 105

Immediate Response Action (IRA) Transmittal Form
Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 38666

F. PERSON UNDERTAKING IRA:

1. Check all that apply: ☐ a. change in contact name ☐ b. change of address ☐ c. change in the person undertaking response actions
2. Name of Organization: VARIAN MEDICAL SYSTEMS INC
3. Contact First Name: MATTHEW 4. Last Name: GILLIS
5. Street: 801 PENNSYLVANIA AVE NW STE 73 6. Title: _____
7. City/Town: WASHINGTON 8. State: DC 9. Zip Code: 200040000
10. Telephone: _____ 11. Ext: _____ 12. Email: MATTHEW.GILLIS@VARIANT.COM

G. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON UNDERTAKING IRA:

- ☐ Check here to change relationship
- ☒ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter
☒ e. Other RP or PRP Specify Relationship: NON-SPECIFIED PRP
- ☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ 4. Any Other Person Undertaking Response Actions: _____ Specify Relationship: _____

H. REQUIRED ATTACHMENT AND SUBMITTALS:

- ☐ 1. Check here if any Remediation Waste, generated as a result of this IRA, will be stored, treated, managed, recycled or reused at the site following submission of the IRA Completion Statement. If this box is checked, you must submit one of the following plans, along with the appropriate transmittal form:
☐ a. A Release Abatement Measure (RAM) Plan (BWSC106) ☐ b. Phase IV Remedy Implementation Plan (BWSC108)
- ☒ 2. 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 MassDEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
- ☐ 3. Check here to certify that the Chief Municipal Officer and the Local Board of Health were notified of the implementation of an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 4. Check here to certify that the Chief Municipal Officer and the Local Board of Health were notified of the submittal of a Completion Statement for an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 5. Check here if any non-updatable information provided on this form is incorrect, e.g. Release Address/Location Aid. Send corrections to BWSC.eDEP@Mass.Gov.
- ☒ 6. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



Immediate Response Action (IRA) Transmittal Form
Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

I. CERTIFICATION OF PERSON UNDERTAKING IRA:

1. I, _____, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form; (ii) that, based on my inquiry of the/those individual(s) immediately responsible for obtaining the information, the material information contained herein is, to the best of my knowledge, information and belief, true, accurate and complete; (iii) that, to the best of my knowledge, information and belief, I/the person(s) or entity(ies) on whose behalf this submittal is made satisfy(ies) the criteria in 310 CMR 40.0183(2); (iv) that I/the person(s) or entity(ies) on whose behalf this submittal is made have provided notice in accordance with 310 CMR 40.0183(5); and (v) that I am fully authorized to make this attestation on behalf of the person(s) or entity(ies) legally responsible for this submittal. I/the person(s) or entity(ies) on whose behalf this submittal is made is/are aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By: _____ 3. Title: _____
4. For: VARIAN MEDICAL SYSTEMS INC 5. Date: _____ (mm/dd/yyyy)

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section F.

7. Street: _____
8. City/Town: _____ 9. State: _____ 10. Zip Code: _____
11. Telephone: _____ 12. Ext: _____ 13. Email: _____

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY 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.

Date Stamp (DEPARTMENT OF ENVIRONMENTAL PROTECTION)

DRAFT COPY

Appendix B. Laboratory Report



EMSL Analytical, Inc.

5 Constitution Way, Unit A Woburn, MA 01801

Tel/Fax: (781) 933-8411 / (781) 933-8412

<http://www.EMSL.com / bostonlab@emsl.com>

EMSL Order: 132401227

Customer ID: AXIO80

Customer PO:

Project ID:

Attention: Geoff Gerace

Axiom Partners, Inc.

50B Salem Street, Suite 103

Lynnfield, MA 01940

Phone: (781) 213-9198

Fax: (781) 213-6992

Received Date: 03/04/2024 8:30 AM

Analysis Date: 03/04/2024

Collected Date: 03/03/2024

Project: 01373.006 - 150 Sohier Road; Beverly, MA

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
030324-57-01A <small>132401227-0001</small>	CPI Building East Side - Cement Board	Gray Non-Fibrous Homogeneous		82% Non-fibrous (Other)	18% Chrysotile
030324-57-01B <small>132401227-0002</small>	CPI Building East Side - Cement Board				Positive Stop (Not Analyzed)

Analyst(s)

John McCarthy (1)

Steve Grise, Laboratory Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method") but augmented with procedures outlined in the 1993 ("final") version of the method. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Woburn, MA NVLAP Lab Code 101147-0, CT PH-0315, MA AA000188, RI AAL-139, VT AL998919, ME LB-0039

Initial report from: 03/04/2024 13:34:17

132401227

Page 1 Of 1

Appendix C. Non-Traditional Work Plan

**NON-TRADITIONAL ASBESTOS ABATEMENT WORK PLAN
SOIL & CEMENT BOARD CLEANUP
150 SOHIER ROAD
BEVERLY, MASSACHUSETTS**

Prepared for:

Jacobs
6312 South Fiddlers Green Circle, Suite 300N
Greenwood Village, Colorado 80111

Prepared by:



Christopher LaPorte
MA Asbestos Designer
License # AD031735
Axiom Partners, Inc.
50 Salem Street, Suite 103B
Lynnfield, Massachusetts 01940

Submitted April 29, 2024
Revised June 5, 2024

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APPENDICES

Appendix A Diagrams

Appendix B Massachusetts Department of Environmental Protection Agency, BWP-AQ36, Application for Non-Traditional Asbestos Abatement Work Practice Approval

A. INTRODUCTION/BACKGROUND

The asbestos site is comprised of exterior mechanical area behind the building located at 150 Sohier Road in Beverly, Massachusetts (Site). The 150 Sohier Road facility is currently owned and operated by Communications & Power Industries (CPI). Asbestos-containing cement board was identified in a 1.5' x 3.5' x 3' deep test pit excavated during drilling operations. Test pit H-13 is located near the foundation on the east side of CPI Building 3.

AXIOM performed an assessment of the Site on March 4, 2024, and collected two samples of suspect debris. Asbestos-containing cement board debris was identified. The cement debris and soil from affected area shall be abated and disposed of as asbestos-containing waste material (ACWM).

Since the asbestos removal will involve cleanup and bulk loading of ACWM, a "non-traditional" asbestos abatement work plan is required. Based on this determination, the following requirements in 310 CMR 7.00 cannot be complied with:

- 310 CMR 7.15 (7)(c), Specific Abatement Work Practice Standards
- 310 CMR 7.15 (7)(e), Work Area Ventilation Requirements
- 310 CMR 7.15 (7)(f)3 and 7.15 (15)(b), Containerization of Asbestos Waste
- 310 CMR 7.15 (7)(f)3 and 7.15 (16)(b), Transportation of Asbestos Waste

As requested by the Massachusetts Department of Environmental Protection (MADEP), this Work Plan has been prepared to address the removal and disposal of the specified ACM/ACWM. Removal and disposal will be performed by PRISM Response LLC dba Alloy Group (License #AC000763) as described herein, upon receipt of MADEP approval and submittal of required regulatory notifications.

The purpose of this Work Plan is to establish procedures to be employed to ensure that the work is performed in a safe manner using appropriate protocols in compliance with state and federal regulations and as specified by the MADEP for this project. In the event that a conflict arises between any of these documents, the most stringent provisions that comply with state and federal regulations shall apply.

B. PROJECT CONTACTS

1. **Owner:** Communications & Power Industries, 150 Sohier Road, Beverly, Massachusetts 01915, Bob Davenport, bob.davenportjr@cpii.com, 978-279-0688.
2. **Abatement Contractor:** PRISM Response LLC (Alloy), 50 Concord Street, North Reading, Massachusetts 01864, Bruce Sullivan, Senior Sales Estimator, bsullivan@alloygroup.com, 978-470-2860.
3. **Asbestos Consultant:** Axiom Partners, Inc., 50 Salem Street, Suite 103B, Lynnfield, MA 01940 (781) 213-9198, Geoff Gerace, Project Manager, Axiom Partners, Inc., AXIOM has been contracted by Jacobs to provide air monitoring and project oversight services for the duration of the abatement. Asbestos Project Monitor assigned to the project is to be determined.

4. Asbestos Transportation and Waste Disposal:

Transporter: IAT Logistics, 48 Waterfall Drive, Unit H, Canton, Massachusetts, 02021, 781-571-8056.

Primary Disposal Facility: Minerva Landfill, 9000 Minerva Way, Waynesburg, OH, 330-866-3435

Additional or substitute waste haulers or landfills will only be used with MADEP approval.

C. SITE SPECIFIC ABATEMENT WORK PLAN

The following ACWM has been identified at the site:

Material	Location(s)	Estimated Quantity ¹
Soil with Cement Board Debris	Rear OF CPI Building at HC-13	15 yd ³

If additional asbestos-containing materials are encountered during the project, the MADEP will be contacted for direction on how to proceed.

The following site-specific work practices and engineering controls will be employed for this project, which is expected to be completed in approximately **two days**. The Site Plans indicating regulated work area limits, demarcation, worker decontamination unit location and approximate ambient air sampling locations are provided in Appendix A of this Work Plan.

Section 1, Preparation

1. A regulated area will be established around the work area using asbestos barrier tape and asbestos warning signs.
2. The air intake vent above the work area will be sealed with two layers of polyethylene sheeting or covered with a HEPA filter and redirected with polyethene sheeting if the air intake vent cannot be closed off.
3. A decontamination unit will be erected contiguous to the regulated work area. The decontamination unit will consist of three separate, adjacent rooms with a shower separated by curtained entrances, constructed in accordance with applicable regulations. The shower will have hot and cold water. A 5-micron filtration system shall be attached to the decontamination unit to filter the wash water. Asbestos warning signs shall be posted on the door to the decontamination unit in accordance with 454 Code of Massachusetts Regulations (CMR) 28.10(4)(b).
4. A **container/equipment** wash shall be established at the perimeter of the regulated work area, where washing of the equipment in contact with the ACWM will occur. Wash water will be collected in basin constructed using 30 mil rubber and a berm of 8" straw wattle. The seams of the rubber shall overlap by 12" and will be sealed by use of spray glue and duct tape. Wash water will be

¹ LF = Linear Feet

filtered through a 5-micron filter and reused to wet packaged ACWM. The wash area shall be located contiguous to the work zone and the location will be shown on the Site Plan.

5. The equipment route from the excavation area to the container/equipment wash will be covered with 10 mil rubber of sufficient width to prevent ACWM from contacting the ground. The equipment/container wash cannot be placed any closer to the excavation area due to building equipment obstructing the access route.
6. At least one garden hose with a minimum diameter of 1.5" supplied by an onsite water spigot adjacent to the work area shall be used to continuously wet the ACWM and control dust during all handling, packaging and loading operations in each work area. Hose nozzle will be adjusted to produce a mist of water. A separate hose shall be staged at the container/equipment wash.
7. All contractor electrical equipment shall be protected by a Ground Fault Circuit Interrupt (GFCI) system. Temporary power supplied by generators will be used to run the equipment as needed.
8. All abatement workers within a regulated work area will be required to wear personal protective equipment (PPE) during all abatement preparation activities as per Section D of this Work Plan. Required PPE for this project will include disposable suits, HEPA-filtered, negative pressure respirators, hard hats, safety glasses, high visibility vests, and steel-toe boots.
9. All heavy equipment will be provided and operated by the asbestos abatement contractor (Alloy).
10. Perimeter air monitoring will be performed around each work area during all non-traditional abatement work. Sampling will be performed in accordance with Section F of this Work Plan. The Asbestos Project Monitor (APM) will set up, collect, and analyze these samples daily. The samples will be analyzed onsite by APM.
11. The abatement contractor will provide a 30-yd roll off container for ACWM disposal that will be lined at the site with two (2) ten-mil (0.010-inch-thick) pre-formed poly liners designed to fit the container with sufficient overhang on all four sides to allow for loading and proper sealing of the waste container.
12. The MADEP will be notified at least 24 hours in advance for scheduling their pre-inspection of the regulated work area. Abatement work shall not start until MADEP has had the opportunity to conduct a pre-inspection.

Section 2, General

1. Adequate water shall be used to ensure no visible dust emissions occur during this work.
2. All workers shall enter and exit each regulated work area through the decontamination unit.
3. All abatement contractor workers involved in this effort will be Massachusetts Department of Labor Standards (DLS) licensed Asbestos Workers or Supervisors with proper and current medical clearances and respirator fit test documentation. All documentation including asbestos training certifications, medical clearance records, respiratory fit-tests, and current Massachusetts asbestos licenses shall be onsite during all phases of work. All work associated with this NTWP will be performed by properly trained and licensed personnel.

4. A sufficient number of HEPA vacuums will be onsite for cleanup of incidental debris and for decontamination of project personnel, equipment and containers.
5. An APM will be on site full time to support the project as described in Section F.
6. All abatement work shall cease in the regulated work area if any of the following occur:
 - a. Project monitor is not on-site.
 - b. In-process air samples are not being collected and/or have not been submitted to MADEP daily.
 - c. Loss of water and/or electrical sources.
 - d. Wind speeds of 15mph or greater or wind gusts exceeding 20mph.
 - e. Breach in regulated work area.

Section 3, Abatement Means and Methods

1. After the regulated work area set-up has been completed and approved by the APM and the MADEP, the heavy equipment (mini-excavator equipped with a bucket/grapple) will bulk load soil with cement board debris into awaiting skid steer. Two feet of soil will be removed from each of the four sidewalls and one foot from the bottom of the trench.
2. The skid steer will transport the soil/debris from the work area to a 30 yard lined roll off located in the container/equipment wash area. The APM will inspect the area for visible debris. Soil removal (and disposal as ACWM) shall continue in increments of at least 1" until the onsite project monitor makes a "no visible debris" determination.
3. All items in Section C (1) and (2) shall apply during the completion of abatement work in this section.
4. The loaded 30-yd roll off container and heavy equipment will exit the site by passing through the wash area. Containers, equipment and truck tires (and any other areas that may have contacted ACM) will be thoroughly hosed off, and the water from this operation will be collected, filtered, and collected for reuse to wet packaged ACWM. The wash area and the rubber on the heavy equipment route shall be cleaned at the end of each work shift.
5. At the end of each shift, any remaining ACWM or incomplete excavation shall be properly wetted, covered with two layers of 6 mil polyethylene sheeting, affixed with asbestos signage and warning tape, and weighted or sealed so that it won't move out of position due to weather. The APM will review all coverings to ensure the piles are completely covered. The polyethylene coverings will be disposed of daily as ACWM at the end of daily live loading. No soil will be stockpiled onsite.
6. The waste container will be covered with an impermeable tarp to prevent water intrusion and affixed with asbestos placards on all four sides
7. Water will be applied continuously but efficiently during work activities to keep materials sufficiently wetted, prevent visible dust/emissions and prevent runoff of water to other areas of the site.
8. The ACWM shall be kept wet during all demolition and asbestos waste packaging operations. Once filled, the roll off will be washed in the wash area prior to leaving the regulated area and immediately

transported off site to the designated asbestos landfill. The APM will conduct a visual inspection of each container/truck that leaves the regulated work area via the wash area for visible debris prior to exiting the regulated work area.

9. Equipment used during the removal shall be decontaminated using wet methods in the decontamination unit. The APM will conduct a visual inspection of washed equipment prior to removal from any regulated work area.
10. All heavy equipment used during the removal shall be decontaminated at the container/equipment wash at the end of each workday. Drip pans will be placed under equipment stored in the regulated work area overnight. The APM will conduct a visual inspection of any washed equipment prior to removal from any regulated work area.
11. All components of the container/equipment wash and the rubber on the heavy equipment route shall be disposed of as ACWM in the roll-off upon completion of work.
12. The APM shall perform a post abatement visual inspection of each work area as per Section F.
13. The MADEP will be notified at least 24 hours in advance for scheduling their post-abatement inspection of the regulated work area.

D. PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. Respirators will be worn during all asbestos related activities. The abatement contractor shall provide respirators to their respective employees, select the appropriate type from among those approved by the National Institute of Occupational Safety and Health (NIOSH) Administration. The abatement contractor shall provide, at a minimum, half-mask air purifying respirators equipped with high-efficiency particulate air (HEPA) filters (minimum rating P100) for this project.
2. Abatement contractor workers will wear protective clothing consisting of, at minimum, disposable full-body suits. As appropriate this will include head/foot coverings and gloves. Protective clothing will be required for all abatement tasks, including preparation work, abatement operation, clean-up and dismantling of work area. The abatement contractor shall package contaminated clothing in sealed, impermeable bags or other approved containers bearing appropriate asbestos hazard and generator labels. This waste shall be transported to the abatement contractor's office at the end of each work shift as per Section E.

The Asbestos Abatement Supervisor will periodically examine employee protective clothing to ensure compliance with this Work Plan. Rips or tears found while the employee is working must be mended or replaced immediately.

E. WASTE PACKAGING AND DISPOSAL

1. The abatement contractor will provide a 30-yd roll off container that will be lined at the site with two (2) ten-mil (0.010-inch-thick) pre-formed poly liners designed to fit the individual container with sufficient overhang on all four sides to allow for loading and proper sealing of the waste container. Each liner is to be individually sealed using spray glue and duct tape along the entire length of the liner with no holes or gaps. The liners shall not be cut or altered in any way and the outer liner shall display at least 3 asbestos hazard and generator labels. Once properly sealed, the packages will

be transported directly to the landfill for disposal. The abatement contractor will also provide sufficient asbestos bags to package ACWM PPE waste. Once properly sealed, the waste bags will be removed from the regulated work area daily and transported under an AWSR to the abatement contractor's office at 50 Concord Street, North Reading, Massachusetts. The container at the abatement contractor's office shall be a six-sided, lockable container used only for temporary storage of ACM/ACWM waste prior to being transported to the landfill for disposal.

2. All waste will be transported in vehicles that meet the requirements of 310 CMR 7.15(16). Transportation of asbestos waste shall be conducted by the waste transporter in conformance with the US Department of Transportation Regulations 49 CFR Parts 172 and 173. The waste container will be labeled with asbestos hazard and generator labels in accordance with all governing regulations and be placarded on all four sides with U.S. Department of Transportation (DOT) Placard for asbestos Class 9/2212 and additional appropriate asbestos warning labels.
3. Disposal shall be in conformance with USEPA NESHAPS Regulations 40 CFR Part 61 and Massachusetts Department of Environmental Protection (DEP) Regulations 310 CMR 7.00, 18.00, and 19.00.
4. A copy of asbestos waste shipment records must be submitted to MADEP the day the ACWM leaves the site. Asbestos waste shall not be stored at the site for more than 24 hours.

F. PROJECT MONITORING

1. AXIOM will have a Massachusetts-licensed Asbestos Project Monitor (APM) on site full time during abatement work to monitor compliance with this Work Plan, to document the work and to perform ambient air monitoring as specified herein.
2. Ambient Air Monitoring: The APM will perform air monitoring outside each regulated work area during asbestos removal operations. Air monitoring stations will be established around the perimeter of each work area and one station downwind of the site. Air samples will be collected and analyzed immediately by Phase Contrast Microscopy (PCM) in accordance with the NIOSH 7400 Method. Sampling will be performed using high volume pumps at flow rates between 8-12 liters per minute to achieve air sample volumes required for reporting limits. A minimum of two sets of four in-process air monitoring stations will be set up per work area and collected daily (am and pm). Air samples will be analyzed onsite promptly after collection.

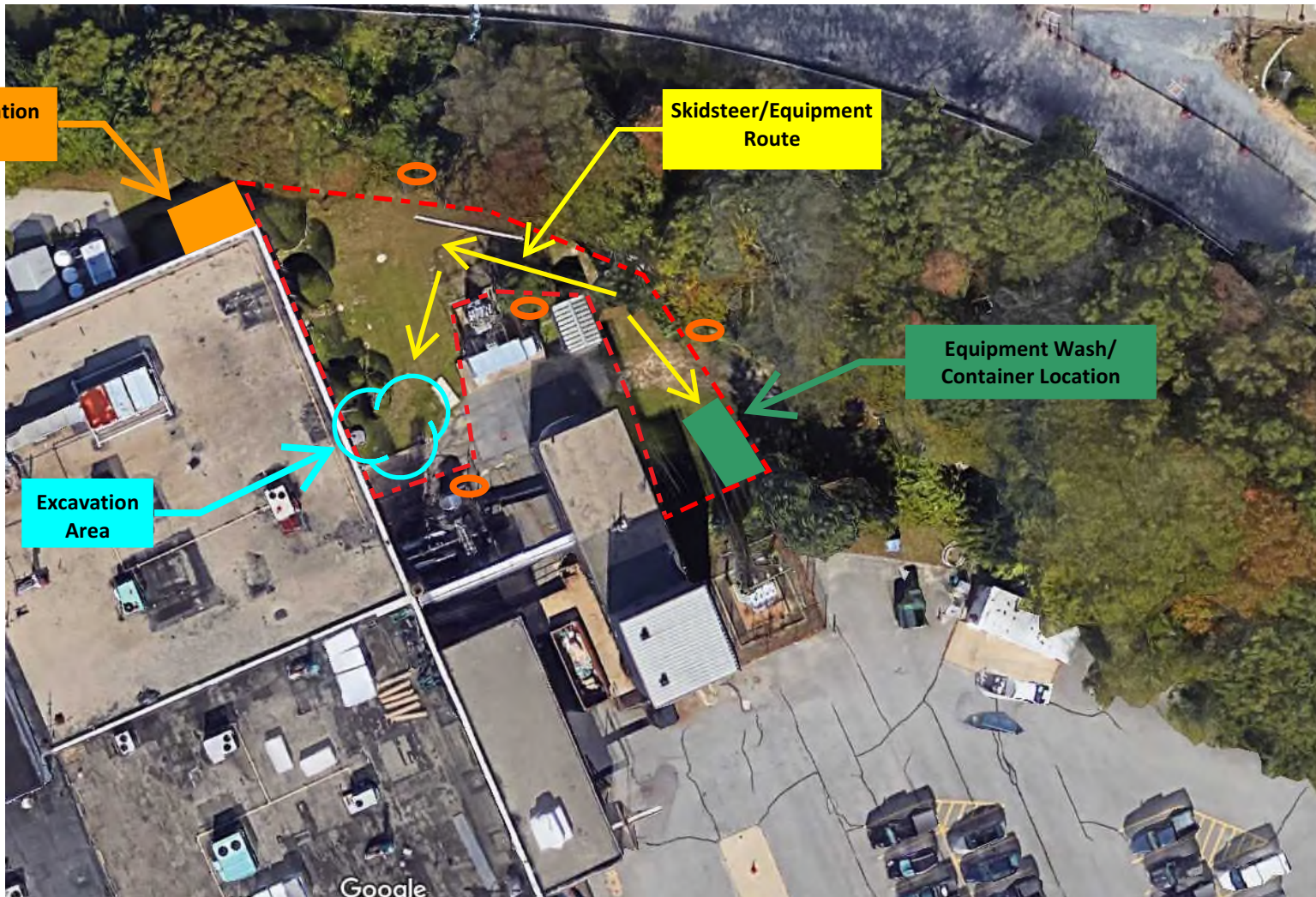
Air sample results will be compared to the DLS post-abatement release criteria of 0.010 f/cc. The following procedures shall be performed in the event that visible emissions are observed or excessive/elevated airborne fiber levels that reach or exceed 0.010 f/cc are measured outside the regulated work area.

- a. Stop all work immediately, restrict access and notify the MADEP within one hour of exceedance. Work shall not resume until authorization has been provided by MADEP.
- b. Perform additional wetting and air misting procedures to reduce airborne fiber levels.
- c. Conduct additional air monitoring until airborne asbestos fiber levels are within acceptable levels.
- d. Assess work practices and engineering controls and modify as necessary to reduce levels.
- e. Perform asbestos abatement as required and upon approval of the MADEP.

3. Air monitoring results will be emailed to MADEP on the day they are collected. Failure to submit perimeter air monitoring daily or asbestos waste shipment records each day may result in MADEP a mandated work stoppage.
4. The APM will perform a final visual inspection after the completion of work operations in the regulated area. A visual inspection shall be conducted to ensure all materials have been removed and no visible ACWM debris remains. Soil removal (and disposal as ACWM) shall continue in increments of at least 1" until the onsite project monitor makes a "no visible debris" determination.
5. The MADEP will be notified at least 24 hours in advance for scheduling their post-abatement inspection of the regulated work area. Abatement work shall not be complete until MADEP has had the opportunity to conduct a final visual inspection.
6. All abatement work shall cease in the regulated work area if any of the following occur:
 - a. Project monitor is not on-site.
 - b. In-process air samples are not being collected and/or have not been submitted to MassDEP daily.
 - c. Loss of water and/or electrical sources.
 - d. Wind speeds of 15 mph or greater or wind gusts exceeding 20mph.
 - e. Breach in regulated work area.

APPENDIX A

Diagrams



NOTES

1. Drawing is NOT-TO-SCALE
2. All Locations are Approximate

REVISIONS	DATE



LEGEND

- Regulated Work Area Limits
- Air Sample Location

AXIOM PARTNERS, INC.
50 Salem Street, Suite 103B
Lynnfield, MA 01940
(781) 213-9198
www.axiomenv.com

DRAWING TITLE
SITE PLAN

APPROVED: _____
APPROVED: _____

PROJECT TITLE
150 Sophier Road
Beverly, MA

BUILDING NUMBER _____ CHECKED _____ DRAWN _____
LOCATION _____ CML

DATE
06/05/2024
PROJECT NO.
01238.007

DRAWING NO.
ASB - 1
DWG. 1 of 1



APPENDIX B

MADEP BWP–AQ36 Application Form for Non-Traditional Asbestos Abatement Work



Massachusetts Department of Environmental Protection

Bureau of Air & Waste

AQ 36 Application for Non-Traditional Asbestos Abatement Work Practice Approval

A. Work Site Information

Important:
When completing forms on a computer, use only the tab key to move your cursor - do not use the return key.



Facility

Communications & Power Industries

Facility Name or Site Description

150 Sohier Road

Facility Address

Beverly

City/Town

MA

State

01915

ZIP Code

Owner

Communications & Power Industries (

Owner Name

150 Sohier Road

Owner Address

Bevelry

City/Town

MA

State

01915

ZIP Code

978-279-0688

Telephone Number

bob.davenportjr@cpil.com

Email Address

Applicant - ☐ Check here if same as Owner and skip to next section. Otherwise, complete fields below.

Axiom Partners, Inc

Applicant Name

50 Salem Street, Suite 103B

Applicant Address

Lynnfield

City/Town

MA

State

01940

ZIP Code

781-213-9198

Telephone Number

claporte@axiomenv.com

Email Address

B. Project Information

Asbestos Project Designer & Consulting Service Provider

Christopher LaPorte

Asbestos Project Designer Name

AD031735

DLS Project Designer License Number

09/27/2024

Expiration Date (MM/DD/YYYY)

Axiom Partners, Inc.

Consulting Service Provider Name

AF38

DLS Consulting Service Certification Number

07/14/2024

Expiration Date (MM/DD/YYYY)

50 Salem Street, Suite 103B

Address

Lynnfield

City/Town

MA

State

01940

ZIP Code

781-213-9198

Telephone Number

claporte@axiomenv.com

Email Address

Continue to the Next Page →



Massachusetts Department of Environmental Protection

Bureau of Air & Waste

AQ 36 Application for Non-Traditional Asbestos Abatement Work Practice Approval

B. Project Information (continued)

Asbestos Project Monitor & Consulting Service Provider

Reggie Germain

Asbestos Project Monitor Name

AM900631

DLS Asbestos Project Monitor Certification Number

Axiom Partners, Inc.

Consulting Service Provider Name

AF38

DLS Consulting Service Certification Number

50 Salem Street, Suite 103B

Address

Lynnfield

City/Town

781-213-9198

Telephone Number

10/29/2024

Expiration Date (MM/DD/YYYY)

07/14/2024

Expiration Date (MM/DD/YYYY)

MA

State

01940

ZIP Code

claporte@axiomenv.com

Email Address

Asbestos Abatement Contractor

Prism Response, LLC

Contractor Name

AC000763

DLS Contractor Certification Number

4000 Triangle Lane Suite 160

Address

Export

City/Town

978-470-2860

Telephone Number

01/17/2025

Expiration Date (MM/DD/YYYY)

PA

State

15632

ZIP Code

bsullivan@alloygroup.com

Email Address

Demolition Contractor (If Applicable)

Contractor Name

Address

City/Town

State

ZIP Code

Telephone Number

Email Address

Circumstances – Explain why a Non-Traditional Asbestos Abatement Work Practice Approval is needed.

- ☐ Facility is being demolished under a state or local government order because it is structurally unsound and in danger of imminent collapse. (Please attach a copy of the order to your work plan proposal.)
- ☐ Asbestos Containing Material (ACM) or Asbestos Containing Waste Material (ACWM) was not accessible for testing, thus not discovered until after demolition began and, as a result, cannot be safely removed.
- ☐ Abatement activity is being conducted as part of an emergency renovation operation.
- ☐ Asbestos abatement activity is being conducted to clean up and decontaminate all or part of a facility where:
 - ☐ Previous asbestos abatement activities were not conducted in compliance with 310 CMR 7.15, or
 - ☐ ACM deterioration, if not immediately attended to, would present a safety or public health hazard.
- ☐ Wetting during a facility renovation would unavoidably damage equipment or present a safety hazard.
- ☒ The project requires bulk loading of ACM and/or ACWM.

Note:
Check all
applicable
boxes.



Massachusetts Department of Environmental Protection

Bureau of Air & Waste

AQ 36 Application for Non-Traditional Asbestos Abatement Work Practice Approval

B. Project Information (continued)

List the requirements of 310 CMR 7.15 that you are unable to comply with and explain why:

Unable to comply with 310 CMR 7.15 Work Practice Standards and Ventilation Requirements,
Containerization and Transportation of Asbestos Waste

Other Project Details

Project Start Date: 06/04/2024
MM/DD/YYYY

Project End Date: 06/05/2024
MM/DD/YYYY

Types & Amounts of ACM and/or ACWM Requiring Non-Traditional Asbestos Abatement Work Practice(s):

☐ Friable N/A
Quantity in Cubic Meters (Cubic Yards)

☒ Non-Friable 15
Quantity in Cubic Meters (Cubic Yards)

Location(s) of ACM in the Facility:

Cement board debris in test pit HC-13 at rear of CPI Building

C. Certification

"I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment. I am aware that this permit application or notification shall not be deemed valid unless payment of the applicable fee is made."

Signature

Christopher LaPorte

Printed Name

Project Manager

Title

05/30/2024

Date (MM/DD/YYYY)

Continue to the Next Page →



Massachusetts Department of Environmental Protection

Bureau of Air & Waste

AQ 36 Application for Non-Traditional Asbestos Abatement Work Practice Approval

D. Submission of Application

Note:

MassDEP review will begin only after your submissions have been received at both locations.

STEP 1: Submit Application

Send the following materials to the appropriate MassDEP Regional Office*, Attention: Asbestos Section:

- ☒ This original completed and signed form.
- ☒ A copy of the check or money order from Step 1.
- ☒ Your proposed work plan, describing work practices, duration and schedule. The proposal must:
 - Include signature of the Asbestos Project Designer who prepared it.
 - Demonstrate that the deviations from 310 CMR 7.15 and alternatives proposed will not cause any visible emissions to the outside air or pose significant risk to public health, safety or the environment.

☐ All supporting documentation.

*Find the MassDEP Regional Office for the community where this work will be done:
<https://www.mass.gov/service-details/massdep-regional-offices-by-community>

STEP 2: Submit Fee Payment

Send the materials below to this address:

MassDEP
 P.O. Box 4062
 Boston, MA 02211

- ☒ A copy of this completed and signed form.
- ☒ Fee payment of \$600* (check or money order payable to "Commonwealth of Massachusetts").

*The following entities are exempt from this fee:

- Cities, towns, counties or districts of the Commonwealth
- Federally recognized Indian tribe housing authorities
- Municipal housing authorities
- The Massachusetts Bay Transportation Authority (MBTA)

Is this a fee-exempt project? ☐ Yes ☒ No

NOTE: Entities that are exempt from the fee must still submit a copy of this completed and signed form, without payment, to the P.O. box above.

From: [Davenport Jr, Bob](#)
To: [Cadorette, Raymond](#)
Cc: [Hamilton, Alycia](#)
Subject: [EXTERNAL] FW: [EXT]: FW: NT Plan Approval 150 Sohier Road Beverly
Date: Monday, June 17, 2024 10:25:48 AM

Hi Raymond,
Not sure who you need to distribute to.
Thanks,
Bob

From: Seward, Peter (DEP) <peter.seward@mass.gov>
Sent: Monday, June 17, 2024 8:40 AM
To: Davenport Jr, Bob <bob.davenportjr@cpii.com>
Subject: [EXT]: FW: NT Plan Approval 150 Sohier Road Beverly

You don't often get email from peter.seward@mass.gov. [Learn why this is important](#)

CAUTION: This email originated from outside of Communications & Power Industries. Do not click links or open attachments unless you recognize the sender and know the content is safe. [HSH928]

From: Seward, Peter (DEP)
Sent: Monday, June 17, 2024 8:16 AM
To: Chris LaPorte <claporte@axiomenv.com>
Cc: bob.davenportjr@cpio.com; Bruce Sullivan <bsullivan@alloygroup.com>; Duhl, Tiffany (DEP) <Tiffany.Duhl@mass.gov>; Dante, Grady (DEP) <grady.dante@mass.gov>; Macauley, John (DEP) <john.macauley@mass.gov>
Subject: NT Plan Approval 150 Sohier Road Beverly

MassDEP Bureau of Air and Waste has completed the review of the Non-Traditional Work Plan (NTWP) submitted to address the cleanup of impacted transite board and continued excavation at 150 Sohier Road in Beverly, Massachusetts. MassDEP hereby approves the NTWP with the following conditions:

1. Prism Response, LLC shall file an **ANF001** utilizing approval number NNT24093 and waiver number NAW2406070.
2. MassDEP **requires** pre-abatement and post-abatement inspections. **Work shall not start until the MassDEP pre-inspection has been conducted.** Provide advance notice to schedule the required inspections. Scheduling of such inspections will be determined by MassDEP availability.
3. **All** requirements of the NTWP must be onsite, set-up, and in place at the time of the MassDEP pre-inspection.
4. *MassDEP* shall be notified immediately if the perimeter air monitoring results reach or

exceed 0.010 f/cc. **All air monitoring results shall be emailed on a daily basis to: NERO.Asbestos@mass.gov**

5. If visible emissions are observed work must cease and MassDEP shall be notified immediately.
6. All response actions comply with 310 CMR 40.0000 of the Massachusetts Contingency Plan
7. A garden hose **shall not be used** for dust suppression and wetting acwm. A fire hose or hose with a minimum diameter of 1.5 inches shall be used for these tasks.
8. Any changes **shall be submitted via an addendum** to this NTWP for prior review and approval by MassDEP.
9. The primary hauler of ACWM shall be IAT Logistics of Canton, MA. The primary disposal facility for all ACWM shall be Minerva Enterprises of Waynesburg, OH.
10. Copies of Asbestos Waste Shipment Records shall be provided to MassDEP on the day the ACWM leaves the site of origin for disposal.
11. The final visual clearance and final air clearance documentation shall be provided to MassDEP.

By performing work pursuant to this Approval, the owner/operator and their contractors, subcontractors and consultants acknowledge and agree that failure to strictly comply with the work plan and conditions contained in this Approval may result in immediate revocation of this Approval and that all parties may be subject to enforcement action by MassDEP. The applicant shall ensure that each party involved in this project receives a copy of the work plan and this Approval. A copy of the application, work plan and Approval shall be kept at the facility for the duration of the project.

Should unforeseen facility conditions require changes to any of the procedures in the work plan or this Approval, the applicant may request an amendment or addendum to the Approval. Any request for changes shall be made to MassDEP in writing. None of the added or amended conditions shall be utilized at the facility until the request has been reviewed and approved by MassDEP in writing. Should you have any questions please contact me or Grady Dante.

Peter C. Seward
Environmental Analyst, Asbestos Inspector
Massachusetts Department of Environmental Protection
Bureau of Air and Waste
150 Presidential Way, Suite 300
Woburn, MA 01801-1150
Phone: (978) 815-3754
peter.seward@mass.gov

Visit our web site: mass.gov/dep

From: [Chris LaPorte](#)
To: [Seward, Peter \(DEP\)](#)
Cc: [Cadorette, Raymond](#)
Subject: [EXTERNAL] RE: NT Plan Comments - 150 Sohier Road Beverly
Date: Thursday, June 6, 2024 12:13:29 PM
Attachments: [image001.png](#)
[150 Sohier Road - NTWP rev2 060524.pdf](#)
[150 Sohier Rd - AQ36 Application 053024 rev1.pdf](#)
[150 Sohier Road - Site Plan 060524.pdf](#)

Good afternoon Peter,

Please find the attached revised work plan as per below with changes in the plan under blue highlights.

Please let me know if you have any questions or need anything else.

Thanks!

C

Christopher LaPorte
Principal



Axiom Partners, Inc.
50 Salem Street, Suite 103B
Lynnfield, MA 01940
(781) 254-5482 (cell)
(781) 213-9198 (office)
claporte@axiomenv.com

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. This message contains confidential information and is intended only for the individual or individuals named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: Seward, Peter (DEP) <peter.seward@mass.gov>
Sent: Monday, June 3, 2024 4:13 PM
To: Chris LaPorte <claporte@axiomenv.com>
Cc: Cadorette, Raymond <Raymond.Cadorette@jacobs.com>
Subject: RE: NT Plan Comments - 150 Sohier Road Beverly

MassDEP has completed its review of the NT Plan submitted to address the abatement of asbestos-containing cement board uncovered during excavations at 150 Sohier Road in Beverly. MassDEP has the following questions/comments:

- Section 2 Bullet 3 – *...All heavy machinery operators will have a minimum of 16-hour asbestos awareness training.* Please indicate who will be responsible for operating heavy machinery. Please provide confirmation from DLS indicating that 16-hour awareness training is sufficient for this task. **This sentence was deleted. The abatement contractor will have a MA licensed asbestos worker operating the heavy equipment. Please update the NT Plan to indicate that Alloy Group will provide asbestos trained workers to operate the heavy equipment.**
Added to Section C1, #9
- Section D Bullet 2 – Please be specific when describing what happens to non-bulk loading acwm at the end of each work shift (e.g., temp storage onsite in a totally enclosed lockable container, transported to the asbestos contractor's place of business for temporary storage in a totally enclosed lockable container, transported to a permitted transfer station for temp storage, or transported directly to the landfill). **Non-bulk waste bags will be added to the 30-yd rolloff container. Added to Section D #2. Non-bulk loading acwm (asbestos suits, rags, Tyvek, filters, etc) shall not be included in the bulk loading container. This material must be properly stored/transported at the end of each work shift. You have the option of temporarily storing this properly packaged material onsite in a suitable enclosed 6-sided locking container (please provide a detailed description of the container) or you may have the asbestos contractor transport this material to their place of business for temporary storage in a suitable container until it is picked up for final transport to the asbestos landfill. If you choose to have the asbestos contractor transport this material, you must clearly state this and provide the address of the temporary storage location and clearly state that this material shall be transported daily at the end of each work shift PPE waste to be transported to abatement contractor's office. Edited Section D#2 and added to Section E #1**
- Section D Bullet 3 – *The heavy equipment operator will be in an enclosed cabin; PPE is optional.* Please provide confirmation for MassDLS indicating that PPE is optional for this task. **Removed from plan, The operators will be in an enclosed cabin, but they will also don the appropriate PPE should they need to exit the cabin within the work area. Please clearly state the name of the company that will provide the heavy equipment and provide the personnel to operate the heavy equipment. Added to Section C1, #9**
- Section 1 Bullet 5 - *The equipment route from the excavation area to the container/equipment wash will be covered with 10 mil rubber of sufficient width to prevent ACWM from contacting the ground.* At the end of abatement activities, please provide your proposal for handling the 10 ml rubber leading from the excavation area to the asbestos waste container. **Added to Section C3, #4 and #11**
- Section 1 Bullet 6 - *At least one fire hose or hose with a minimum diameter of 1.5" supplied by onsite sources.* **Please list your water source. Edited Section C1 #6**
- Section E Bullet 4 - Asbestos waste shall not be stored at the site **for longer than 30 days.** Please clearly define which waste stream you are referring to. Non bulk loading waste that is temporarily stored at an appropriate location in 6 sided totally enclosed lockable containers may be stored onsite for up to 30 days. **Non bulk waste will be transported to abatement contractor's office.** You state elsewhere in the plan that bulk loading waste will be transported offsite immediately after the dumpster is filled, sealed, and cleaned. **Bulk load waste will be onsite for 24 hours. Added to Section E #4.** If you are proposing to temporarily

store open top dumpsters at the Site you must indicate where will they be stored **Added to Section C3, #2**, how will they be secured overnight (preferably behind locked fencing), and what will be done to prevent water intrusion while awaiting transport, **Added to Section C3, #2**, how and add this area to your Site figure **edited**. We should discuss the proposed temporary onsite storage for 30 days as the integrity of the bladder seals may be compromised during such a lengthy storage. **Changed to 24 hours onsite.**

Thanks,

Peter C. Seward
Environmental Analyst, Asbestos Inspector
Massachusetts Department of Environmental Protection
Bureau of Air and Waste
150 Presidential Way, Suite 300
Woburn, MA 01801-1150
Phone: (978) 815-3754
peter.seward@mass.gov
Visit our web site: mass.gov/dep

From: Chris LaPorte <claporte@axiomenv.com>
Sent: Thursday, May 30, 2024 8:26 AM
To: Seward, Peter (DEP) <peter.seward@mass.gov>
Cc: Cadorette, Raymond <Raymond.Cadorette@jacobs.com>
Subject: RE: NT Plan Comments - 150 Sohier Road Beverly

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning Peter,

Please find the attached revised NTWP for 150 Sohier Road. My comments are noted below in red.

Thanks!

C

Christopher LaPorte
Axiom Partners, Inc.
(781) 254-5482 (cell)

From: Seward, Peter (DEP) <peter.seward@mass.gov>

Sent: Monday, May 20, 2024 5:00 PM

To: Chris LaPorte <claporte@axiomenv.com>

Cc: Cadorette, Raymond <Raymond.Cadorette@jacobs.com>

Subject: NT Plan Comments - 150 Sohier Road Beverly

MassDEP has completed its review of the NT Plan submitted to address the abatement of asbestos-containing cement board uncovered during excavations at 150 Sohier Road in Beverly. MassDEP has the following questions/comments:

- The AQ36 indicates the property owner is Varian Medical Systems but Section A of the NT Plan indicates the owner is CPI Industries. Please update the NT Plan/AQ36 to ensure they are consistent. **EDITED to CPI**
- Section C – Please delete the ~~striketrough~~ text - *...If additional asbestos-containing material other than those explicitly identified herein are encountered during the project, the MADEP will be contacted for direction on how to proceed.* **EDITED**
- Section 1 Bullet 4 – Please update the text as indicated – At least one ~~water hose~~ **fire hose or hose with a minimum diameter of 1.5"** supplied by...**EDITED, now bullet 5**
- Section 1 Bullet 8 (**now bullet 10**) & Section 3 Bullet 3 – Please be specific when discussing the containers that will be used to package acwm (type, size, etc) and update the text throughout. **Added a 30-yd roll off container (just one roll off container needed)**
- Section 2 Bullet 3 – *...All heavy machinery operators will have a minimum of 16-hour asbestos awareness training.* Please indicate who will be responsible for operating heavy machinery. Please provide confirmation from DLS indicating that 16-hour awareness training is sufficient for this task. **This sentence was deleted. The abatement contractor will have a MA licensed asbestos worker operating the heavy equipment.**

Section 3 Bullet 1 – Please provide your reasoning for using a skid steer to transport acwm from the excavation area rather than bulk loading directly from the excavator into the container. If this is your proposal, the path taken by the acwm-loaded skid steer must be addressed (e.g., covering, cleaning, etc). If possible, consider moving the truck wash/loading pad next to the excavation area.

The container and wash area cannot be placed adjacent to the excavation area due to building equipment obstructing access. The travel lane will be covered using 10-mil rubber and cleaned daily and upon completion (See Section 1 #5)

- Section 3 Bullet 1 - *...Soil will be removed up to a depth of 5' in the asbestos work area.* Please explain this statement. Please provide the dimensions of the test pit where the transite board was found. **Initial dimensions of trench added to introduction.** Please add the minimum amount of soil that will be excavated during your first pass (1 ft, 2 ft, 5 ft, etc.) and discuss if you plan to remove any soil from sidewalls. **2' of soil to be removed from each of the four sidewalls and one foot from the bottom of the trench. Additional removal of soil if visible debris found. Added to Section 3 #1**

Section 3 Bullet 4 – If you are proposing to stockpile soil, please indicate the maximum amount of soil that will be stockpiled on soil at any one time. Also add that stockpiled waste shall be packaged during the next work shift. **No soils will be stockpiled, Added a note to Section 3 #5**

- Section D Bullet 2 – Please be specific when describing what happens to non-bulk loading acwm at the end of each work shift (e.g., temp storage onsite in a totally enclosed lockable

container, transported to the asbestos contractor's place of business for temporary storage in a totally enclosed lockable container, transported to a permitted transfer station for temporary storage, or transported directly to the landfill). **Non-bulk waste bags will be added to the 30-yd rolloff container. Added to Section D #2**

Section D Bullet 3 – *The heavy equipment operator will be in an enclosed cabin; **PPE is optional.***

Please provide confirmation for MassDLS indicating that PPE is optional for this task. **Removed from plan, The operators will be in an enclosed cabin, but they will also don the appropriate PPE should they need to exit the cabin within the work area.**

- Section E Bullet 2 – Please add that DOT asbestos placards shall be applied to all 4 sides of the waste container. **EDITED**
- Please add the following text: **All components of the truck wash shall be disposed of as acwm in the last live load. EDITED to add truck wash in roll off container at the completion of work. Added to Section 3 #10**
- Site Figure – If possible, please move the truck wash closer to the excavation area. Please add the truck route. **EDITED The container and wash area cannot be placed adjacent to the excavation area due to building equipment obstructing access. Skid steer route to include rubber lining the route. Roll off container to remain in truck wash area.**

I also added a new preparation item in Section1 Preparation #2 for an intake vent right above the work area. If we are able to seal it off, we will do so otherwise we will add a HEPA filter to the intake and add a poly shield to help redirect where the intake air will come from. The facilities director is working on a solution to allow us to seal the intake.

Regards,

Peter C. Seward
Environmental Analyst, Asbestos Inspector
Massachusetts Department of Environmental Protection
Bureau of Air and Waste
150 Presidential Way, Suite 300
Woburn, MA 01801-1150
Phone: (978) 815-3754
peter.seward@mass.gov
Visit our web site: mass.gov/dep