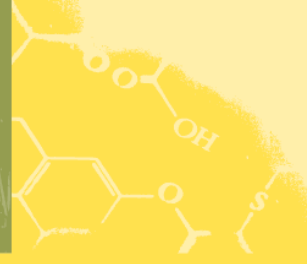




WHERE BUSINESS AND THE ENVIRONMENT CONVERGE



588 Silver Street, Agawam, MA 01001 tel 413.789.3530 fax 413.789.2776 www.ecsconsult.com

Massachusetts Department
of Environmental Protection
Western Regional Office
436 Dwight Street
Springfield, MA 01103

October 14, 2011
Project No. 01-214474
Document No. 40614

RE: Release Abatement Measure Plan
88-90 South Maple Street
Westfield, Massachusetts
Release Tracking Numbers (RTNs) 1-15718 & 1-16079

Dear Sir/Madam:

Environmental Compliance Services, Inc. (ECS) has prepared the flowing Release Abatement Measure (RAM) Plan in accordance with 310 CMR 40.0444 of the Massachusetts Contingency Plan (MCP) for soil and groundwater management activities to be conducted at the above referenced property located in Westfield, Massachusetts (herein referred to as the "Site"). The Responsible Party and Licensed Site Professional (LSP) of record for the Disposal Site are Sunoco, Inc. and Neal Carey, LSP #5521 of GZA GeoEnvironmental, Inc. (GZA) respectively. A Site Location Map is provided as Figure 1.

F.L. Roberts & Company purchased the property and has proposed the construction of a Jiffy Lube on a portion of the property which is located within the boundaries of the Disposal Site. This construction activity may result in the generation of soils and groundwater that have been impacted by the releases associated with RTNs 1-15718 and 1-16079. The objective of the RAM is to manage potentially impacted soils and groundwater encountered during construction of the Jiffy Lube. The Proposed Site Layout Plan is provided as Attachment I. The construction of this building will not prevent or impede the implementation of likely response actions in the future.

Contact information for the party conducting the RAM and the LSP for the proposed RAM activities are provided below:

Party Conducting the RAM

Frank Roberts
F.L Roberts & Company, Inc.
P.O. Box 1964
Springfield, MA 01102-1964
Telephone: (413) 781-7444

Licensed Site Professional

Alexandra N. Riddle, LSP #9857
Environmental Compliance Services, Inc.
588 Silver Street
Agawam, MA 01001
(413) 789-3530

1.0 DESCRIPTION OF RELEASE, SITE CONDITIONS AND SURROUNDING RECEPTORS

1.1 Description of Release

The following is a brief summary of release response actions performed at the property:

- On June 13, 1988, three 10,000-gallon gasoline underground storage tanks (USTs) were removed from the Site. During UST removal activities, total ionizable compounds (TICs) were detected at concentrations exceeding 100 parts per million (ppm), triggering a reportable condition with the Massachusetts Department of Environmental Protection (MassDEP). The MassDEP issued RTN 1-0489 for the release. On August 25, 1995, a Phase I Completion Report and Response Action Outcome (RAO) Statement were submitted to the MassDEP, for RTN 1-0489, indicating that a condition of No Significant Risk existed at the Site.
- On April 12, 2005, a tank tightness test failed on the regular unleaded dispenser line associated with the UST system. The MassDEP was notified of the threat of release condition, and RTN 1-15718 was issued. Corporate Environmental Advisors, Inc. (CEA) oversaw the excavation of approximately 10 cubic yards of impacted soil.
- In November 2005, additional soil excavation was conducted at the Site. A composite soil stockpile sample contained polychlorinated biphenyls (PCBs) at a concentration above the applicable Reportable Concentration (RC). The MassDEP was notified and RTN 1-16079 was assigned.
- On April 24, 2006, a Phase I Initial Site Investigation and Tier Classification were submitted for RTN 1-15718. The report concluded that Volatile Petroleum Hydrocarbons (VPH) were present in soil and groundwater at concentrations above the applicable Method 1 S-1/GW-2 and/or GW-3 Standards and that comprehensive response actions were required. The Site was classified as a Tier II Disposal Site. On February 8, 2007, RTN 1-16079 was linked to RTN 1-15718.
- On March 28, 2007, additional soil borings were advanced at the site. One soil sample from each boring was collected and analyzed for VPH and PCBs. No concentrations of VPH or PCBs were detected above applicable Method 1 standards, with the exception of VPH C₉-C₁₀ aliphatic hydrocarbons, which were detected in the sample from soil boring SB-103 (at a depth of 15 feet below grade [fbg]).
- Groundwater sampling events were conducted on May 8, 2007, July 12, 2007 and October 10, 2007. VPH was not detected in groundwater samples at concentrations above the applicable Method 1 standards for any of the events.
- CEA performed a Method 3 Risk Characterization for the site and concluded that, with the implementation of an Activity and Use Limitation (AUL), a condition of No Significant Risk existed for the site. The Class A-3 RAO was submitted to the MassDEP on March 28, 2008.

- The MassDEP performed an Audit of the RAO and responded with a Notice of Audit Findings/Notice of Noncompliance in May 2009.
- An Imminent Hazard Evaluation (IHE) was performed for PCBs at the Site. On May 27, 2009, fifteen soil borings (SB-301 through SB-315) were advanced to assess the vertical and lateral distribution of PCBs. PCBs were detected in unpaved surficial soils at concentrations exceeding 10 milligrams per kilogram (mg/Kg). Two soil samples SB-313 and SB-315 contained concentrations of PCBs exceeding the MCP Upper Concentration Limit (UCL) of 100 mg/Kg. The MassDEP was notified of the condition of a possible Imminent Hazard on June 15, 2009. A subsequent IHE was performed, which demonstrated that no Imminent Hazard existed. The IHE was submitted to the MassDEP on June 25, 2009.
- CEA submitted an RAO Retraction and Post-Audit Completion Statement to the MassDEP on August 7, 2009. The letter report concluded that, based on the PCB dated obtained from the June 2009 assessment activities, that the Method 3 Risk Characterization was no longer applicable to the site. The AUL, which was recorded at the Hampden County Registry of Deeds on March 6, 2008, was terminated on August 5, 2009.
- Apex Companies, LLC. (Apex) submitted a Self-Implementing Cleanup and Disposal Plan (SIP) to the United States Environmental Protection Agency (EPA) in May 2011, to address notification, cleanup and disposal of Toxic Substance Control Act (TSCA) bulk PCB remediation waste. At this time, the SIP is under review by the EPA.

Residual gasoline-impacted soils are present at the Site. During excavation activities performed by CEA in April and November 2005, approximately 10 cubic yards on gasoline-impacted soils were removed from the Site from the area of the Gasoline USTs and the three dispenser islands (two islands located to the east of the Site building and one island located to the west of the Site building). The area of the 2005 excavation is shown on the *Apex Site Plan and Proposed Excavation Areas*, included as Attachment II. Subsequent to excavation, the area of remaining gasoline-impact was soils beneath and to the north of the western dispenser island on the eastern side of the Site building.

PCBs are present in soils across the Site. Apex concluded that the presence of PCBs in soil at the Site is due to historical flooding of the Little River, which deposited sediments/soils that had been impacted with PCBs from upstream manufacturing operations, onto the Site property. Between 2005 and 2011 approximately 133 soil samples from across the Site were collected by CEA and Apex and submitted for laboratory analysis of PCBs. An area of the western, unpaved portion of the Site has two locations where PCBs are present at concentrations exceeding the UCL of 100 mg/Kg. This area is more than 200 feet from the proposed RAM Plan area.

1.2 Site Conditions and Surrounding Receptors

The property consists of four separate parcels, totaling 3.16 acres. The parcels are identified by the City of Westfield Assessor's Office as follow: Parcel 39-1, 0.28 acres; Parcel 39-2, 0.47 acres;

Parcel 39-3, 1.30 acres and Parcel 39-29, 1.11 acres. The property is operated as a Sunoco gasoline station and Golden Nozzle Car Wash. The parcel supports a convenience store and a one-story metal building utilized as the car wash. Municipal water, sanitary sewer, storm water sewer, gas, telephone and electrical services are provided to the site. The gasoline UST system is located in the center of the property. The store is located north of the USTs and the pump islands are located on the eastern and western sides of the store. The car wash is located on the eastern boundary of the site. Three vacuum islands are present to the west of the car wash. A Site Plan is included as Figure 2.

There is no surface water on the site. The Little River is located approximately 200 feet south/southeast of the site, beyond an area of wooded land. Residential properties abut the site to the east and across South Maple Street to the north/northeast. Commercial properties are present along South Maple Street, to the west of the site.

An area designated as Habitats of Species of Rare Wetlands Wildlife, associated with the Little River, is located adjacent to the south of the site. No Potentially Productive Aquifers, Sole Source Aquifers or Non-Potential Drinking Water Source Areas are present within 500 feet of the site. No municipal drinking water supplies or known private groundwater production wells are located within 500 feet of the site. No Zone II Areas, Interim Wellhead Protection Areas or Zone A areas are located within 500 feet of the Site.

2.0 RAM PLAN OBJECTIVES

The objective of the RAM is to properly manage impacted soil and groundwater encountered during the proposed construction of a Jiffy Lube.

Soil and groundwater containing concentrations of oil and/or hazardous materials equal to or greater than applicable Reportable Concentrations are classified by the MCP as *Remediation Waste* and will be managed in accordance with applicable regulations. Soils containing concentrations of contaminants less than applicable Reportable Concentrations and that are not otherwise a hazardous waste may be transported from a disposal site without MassDEP approval provided that such soils:

- (a) are not disposed or reused at locations where the concentrations of oil or hazardous materials in the soil would be in excess of a release notification threshold applicable at the receiving site, as delineated in 310 CMR 40.0300 and 40.1600; and
- (b) are not disposed or reused at locations where existing concentrations of oil and/or hazardous material at the receiving site are significantly lower than the levels of those oil and/or hazardous materials present in the soil being disposed or reused.

ECS collected a groundwater sample from monitoring well MW-102, located adjacent to the western side of the proposed construction area. The groundwater sample was submitted for laboratory analysis of semivolatile organic compounds (SVOCs) by Environmental Protection Agency (EPA) Method 625, volatile organic compounds (VOCs) by EPA Method 8260C, PCBs by EPA Method 608, total petroleum hydrocarbons (TPH) by EPA Method 1664, ethylene dibromide (EDB) by EPA Method 504.1, total

metals (silver, arsenic, cadmium, chromium, copper, iron, nickel, lead, antimony, selenium, and zinc) by EPA Method 200.7, mercury by EPA Method 245.1/7470A, cyanide by EPA Method 9012A, total residual chlorine by Hach 8167, chloride by EPA Method 300, and total suspended solids by Method SM2540D. The results of laboratory analysis were reported to the City of Westfield Water Resources Department in a Sanitary Sewer Discharge Permit request. The Permit request is currently under review by the City of Westfield Water Resources Department.

ECS performed a subsurface investigation in the area of the proposed construction. Soil samples were collected in a 15 to 20 foot grid pattern, across an area of approximately 100 feet by 100 feet in order to pre-characterize the soils that will be encountered during construction activities. The construction area comprises approximately 10,000 square feet of the northeastern corner of the Site property. It is expected that excavation activities will reach up to 9.5 fbg within the footprint of the proposed building; soils up to 4 feet deep will also be disturbed in the areas where new utility connections will be located. The remainder of this area of the Site is expected to be disturbed to depths of approximately 18 inches for the purposes of grading and paving.

On September 26, 2011, ECS was on-Site to advance twelve hand soil borings (PB-1 through PB-12) within the area of the proposed Site work. Soil boring locations are depicted on Figure 2- Site Plan. These borings were advanced to a depth of three fbg, using a hand auger. Soil samples were collected from the 0-1, 1-2 and 2-3 foot intervals and submitted for laboratory analysis of PCBs via EPA Method 8082. In soil samples where PCBs were detected above the laboratory reportable detection limit (RDL), concentrations ranged from 0.025 mg/Kg of PCB Arochlor 1260 in sample PB-8 (1-2 foot interval) to 3.55 mg/Kg of PCB Arochlor 1248 in sample PB-11 (1-2 foot interval). Sample PB-11 (1-2 foot interval) was the only sample with a concentration detected above the applicable Method 1 standard of 2 mg/Kg. The PCB results for the samples from PB-12 showed an increasing trend with depth, however all concentrations detected were below the Method 1 standard.

During excavation activities, the approximately 5 cubic yards of soils represented by PB-11 (an approximately 8-foot square area to a depth of 2 fbg) will be stockpiled and characterized for disposal at an approved facility or transported off-Site for use as landfill cover.

ECS returned to the Site on October 3, 2011, to advance five of the soil borings (PB- 4A, PB-5, PB-7A, PB-8 and PB-12) to a depth of 10 fbg (with the exception of PB-12 which was advanced to a depth of 6 fbg)¹. Borings PB- 4A, PB-5, PB-7A and PB-8 are located within the footprint of the proposed building; boring PB-12 was investigated to depth to confirm that PCB concentrations were not increasing to concentrations above the Method 1 standard, with depth. Additional soil samples were collected for landfill disposal characterization. No concentrations of PCBs were detected above the laboratory RDLs in the samples collected from the 4-10 foot intervals of borings PB- 4A, PB-5, PB-7A or PB-8. No concentrations of PCBs were detected above the Method 1 standard in the 4-5 or the 5-6 foot intervals samples from boring PB-12 and PCB concentrations showed a decrease with depth.

¹It should be noted that soil borings PB-4 and PB-7 were initially slightly outside the proposed building footprint, therefore they were moved approximately one foot over to be located within the proposed footprint; these second locations are identified as PB- 4A and PB-7A.

Six soil samples were composited as follows:

- PB-5 & PB-8 (within the building footprint), 4 to 10 foot intervals
- PB-4A and PB-7A (within the building footprint), 4 to 10 foot intervals
- PB-1, PB-4, PB-7 & PB-10 (in the area of trenching and grading), 0 to 3 foot intervals
- PB-2, PB-5, PB-8 & PB-12 (in the area of trenching and grading), 0 to 3 foot intervals
- PB-3, PB-6 & PB-9 (in the area of trenching and grading), 0 to 3 foot intervals
- PB-11 (where PCBs were detected at greater than 2 mg/Kg) 0 to 3 foot interval composite.

These six composited soil samples were submitted for laboratory analysis of the landfill disposal characterization: VOCs via EPA Method 8260C, SVOCs via EPA Method 8270C, PCBs via EPA Method 8082, TPH via EPA Method 8100, total metals: arsenic, barium, cadmium, chromium, lead, mercury, selenium and zinc via EPA Method 6010/200.7, conductivity, reactivity, corrosivity and ignitability. The results of the laboratory analysis indicate that the soils will be acceptable for use as landfill cover or for re-use at the Site.

Based on the results of the laboratory analytical results obtained to date, it is not expected that the construction activities will prevent or impede any future remedial actions that may be conducted by the PRP for the Site.

3.0 REMEDIATION WASTE

None of the composite soil samples that were submitted for disposal characterizations qualify as remediation waste. The segregated and stockpiled soils from the vicinity of PB-11 will be characterized for disposal and will be transported to a licensed disposal facility, under a Bill of Lading (BOL), if required. It is anticipated that no more than 5 cubic yards of remediation waste will be generated; however, should site conditions not be as expected, a contingency for up to 50 cubic yards is requested. Soils that are not impacted will be reused on-Site if possible; however, it is expected that approximately 800 to 900 cubic yards of soil, generated during the proposed construction activities, will be transported off-Site for re-use as landfill cover. These soils will be transported under a Material Shipping and Record Log (MSRL) to the Connecticut Valley Sanitary Landfill, in Chicopee, Massachusetts.

Should groundwater be encountered during excavation activities, it will be recovered from the excavation. Submersible, pneumatic pumps will collect groundwater from the excavation areas and pump it to a settling/fractionation tank, through liquid phase granular activated charcoal (LGAC), then discharged to the City of Westfield sewer line located along South Maple Street under a valid discharge permit.

4.0 PERMITS

The discharge of groundwater to the Westfield sewer system will be conducted under a City of Westfield Water Resources Department Temporary Permit.

Project No. 01-214474/Document No. 40614
MassDEP
Springfield, Massachusetts
October 14, 2011

Page 7

5.0 SCHEDULE

Groundwater sampling and analysis was performed on September 15, 2011, for the purpose of preparing the permit application for the City of Westfield Water Resources Department Temporary Permit, for the discharge of any groundwater that may be encountered during the performance of the RAM. Soil borings were advanced by hand and with a geoprobe direct-push drill rig on September 26, 2011 and October 3, 2011, respectively. Soil samples were collected and analyzed for the purpose of characterizing soils for future off-Site re-use or disposal.

Excavation activities are expected to commence mid-late October 2011, and may take 45 to 60 days to complete.

Should you have any questions regarding this information, please do not hesitate to contact the undersigned.

Sincerely,
ENVIRONMENTAL COMPLIANCE SERVICES, INC.

A handwritten signature in cursive script that reads "Alexandra N. Riddle".

Alexandra N. Riddle, LSP
Senior Project Manager

ANR/kab
Attachments

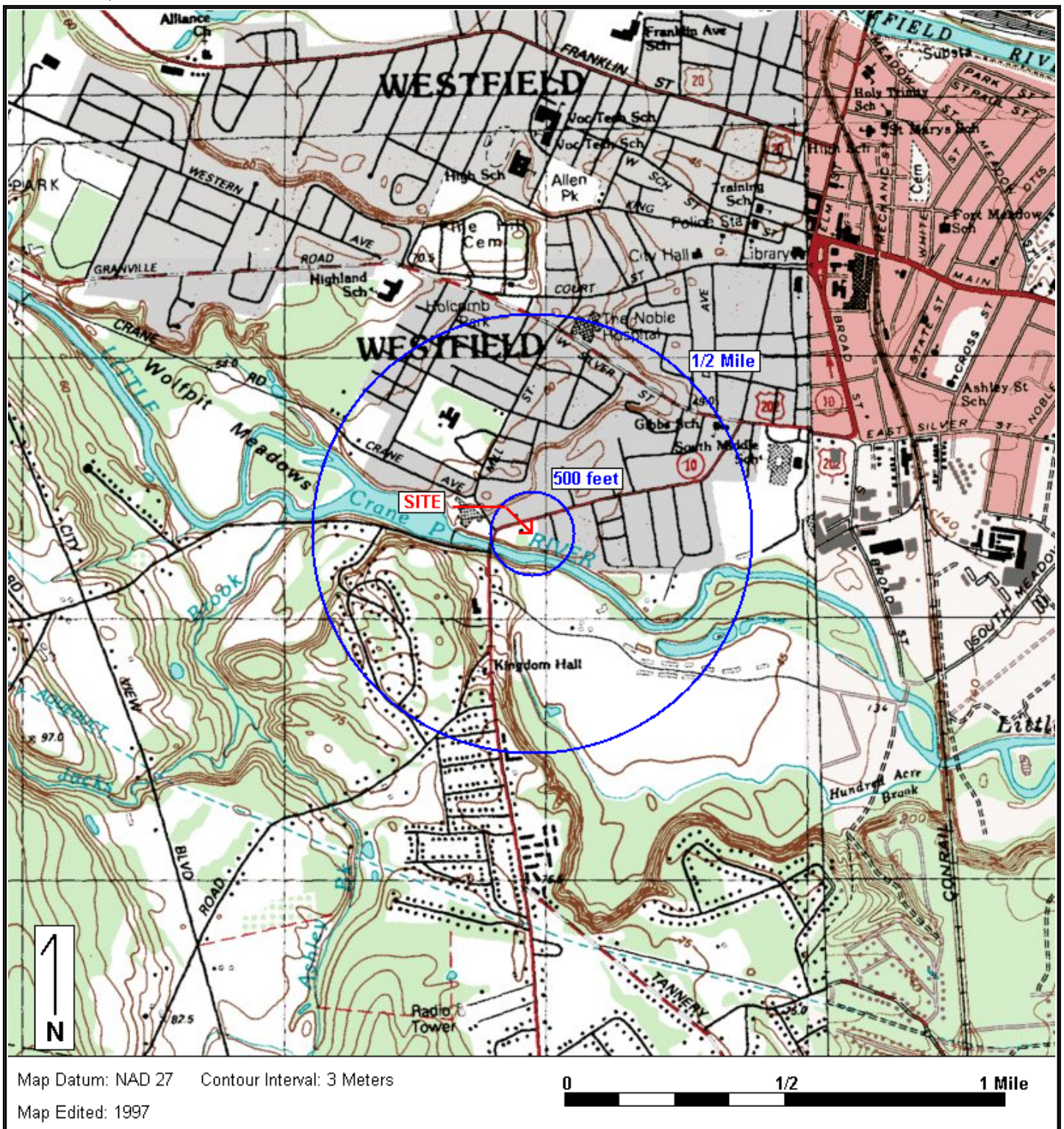
FIGURES



Environmental Compliance Services, Inc.
588 Silver Street
Agawam, MA 01001
Phone 413.789.3530 Fax 413.789.2776
www.ecsconsult.com

88 South Maple Street
88 South Maple Street
Westfield, MA 01085

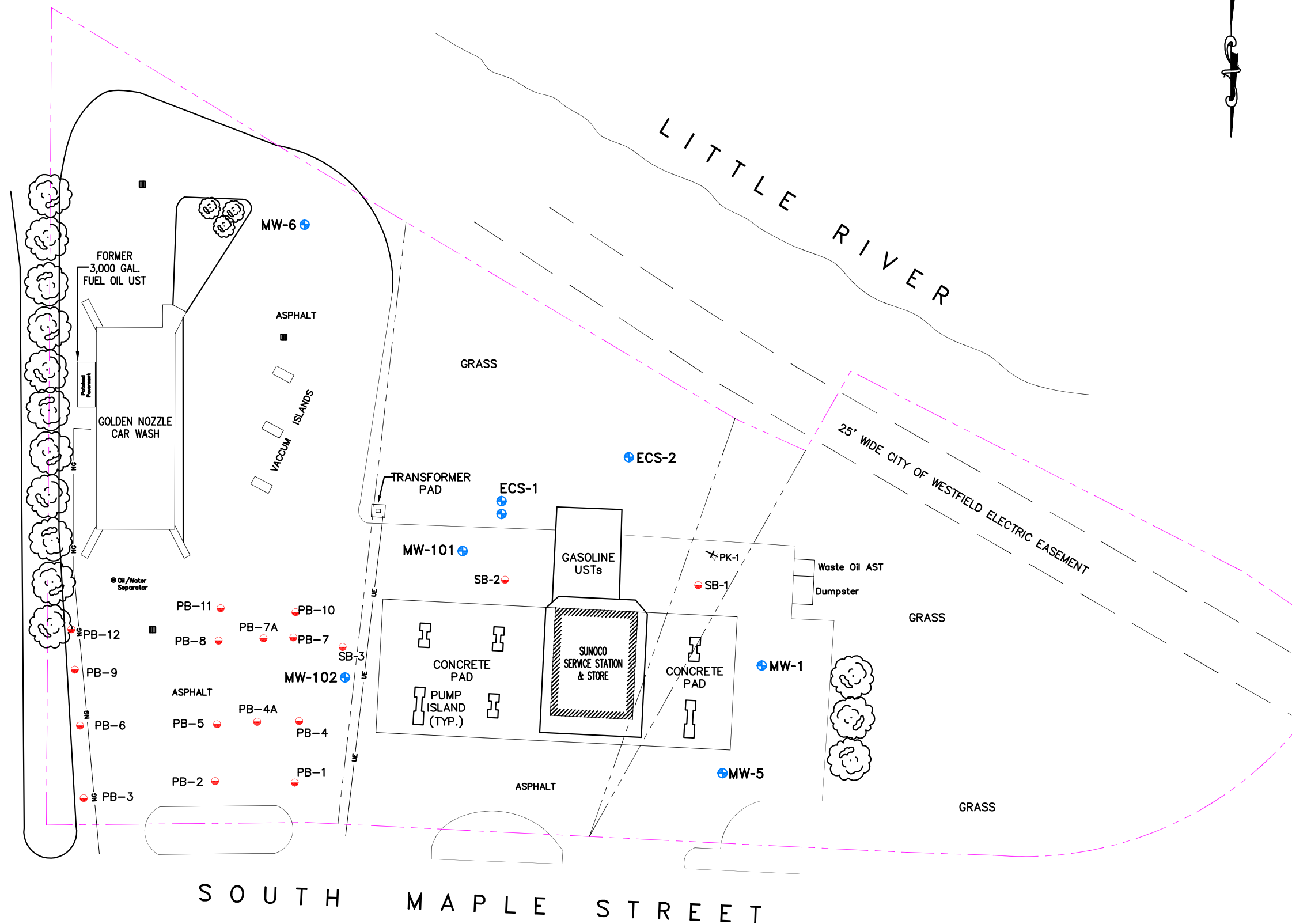
Figure 1: SITE LOCUS



Base Map: U.S. Geological Survey; Quadrangle Location: Southwick, MA

Lat/Lon: 42° 6' 40" NORTH, 72° 45' 45" WEST - UTM Coordinates: 18 684977 EAST / 4664545 NORTH

Generated By: Rich Walas



Legend

- Approximate Property Line
- ▢ Catchbasin
- Soil Boring
- ⊕ Monitoring Well
- ECS-1 Well I.D.

General Notes:

All locations, dimensions, and property lines depicted on this plan are approximate. This plan should not be used for construction or land conveyance purposes.

Base plan is based on information provided by a plan prepared by Sun Company, Inc. (R&M) of Philadelphia, PA, entitled "Plot Plan Proposed Improvements", Project Number 53037, and dated May 5, 1993.

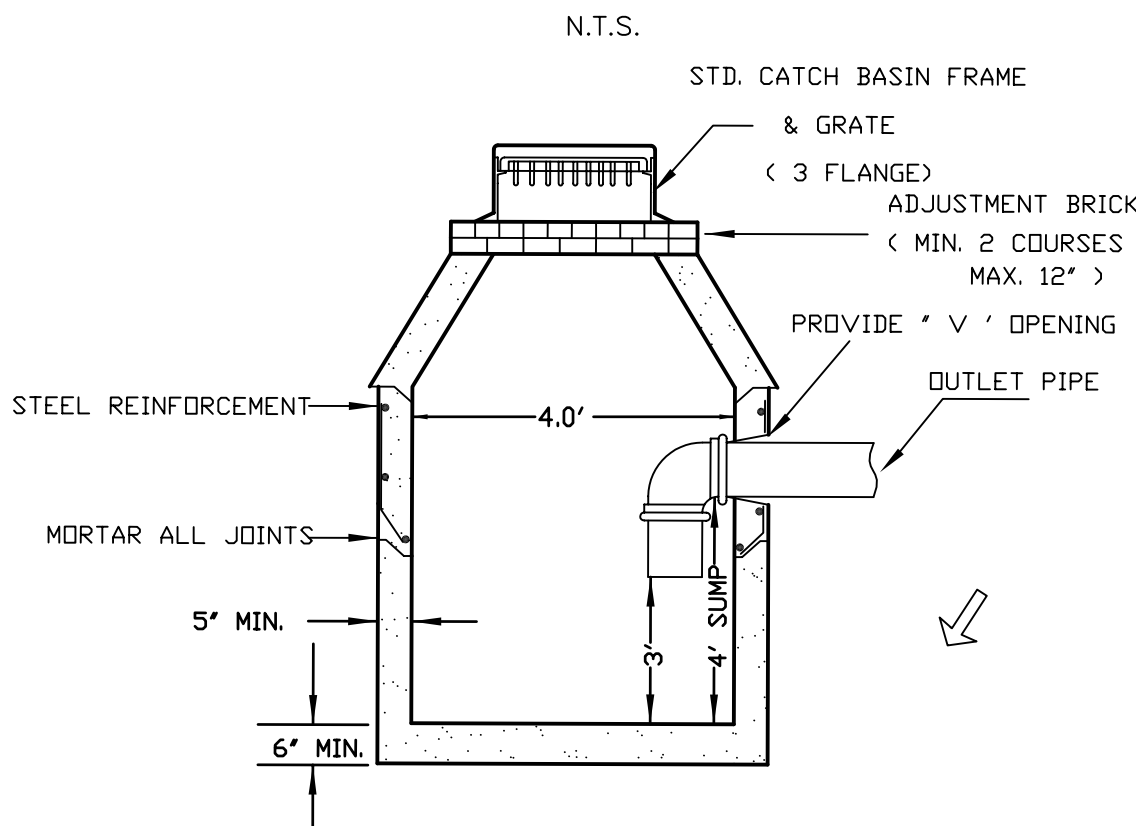


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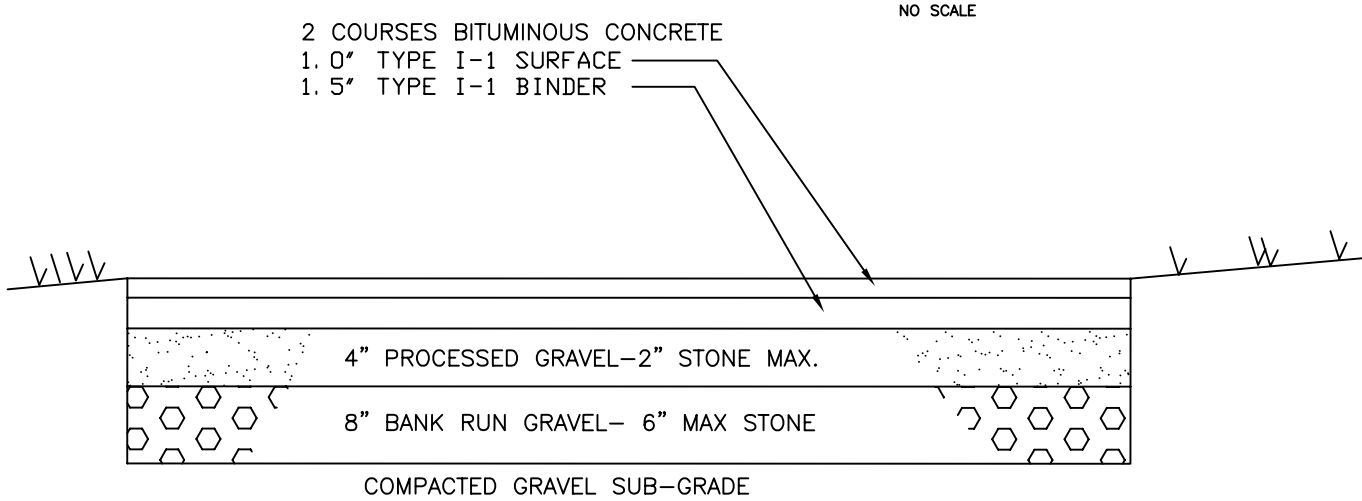
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TITLE: Site Plan			
CLIENT: TD Bank			
GRAPHIC SCALE: 0 25 50			
CAD FILE: K:\CAD\Agawam - 01\214474\214474.dwg			
SAVED BY: KPHULE			
DRAWN BY:	DESIGNED BY:	CHECKED BY:	APPROVED BY:
KDP	RSW	AA	AA
SCALE:	DATE:	JOB NO.:	FIGURE NO.:
1"=50'	OCT 2011	214474	2

ATTACHMENT I
CONSTRUCTION PLAN

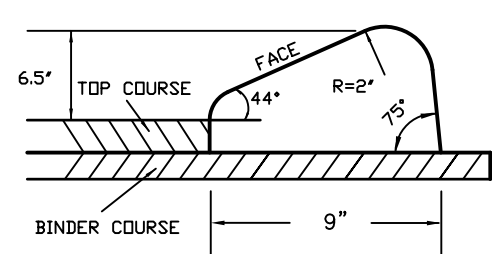
STANDARD PRECAST CONCRETE
CATCH BASIN
WITH OIL SEPARATOR



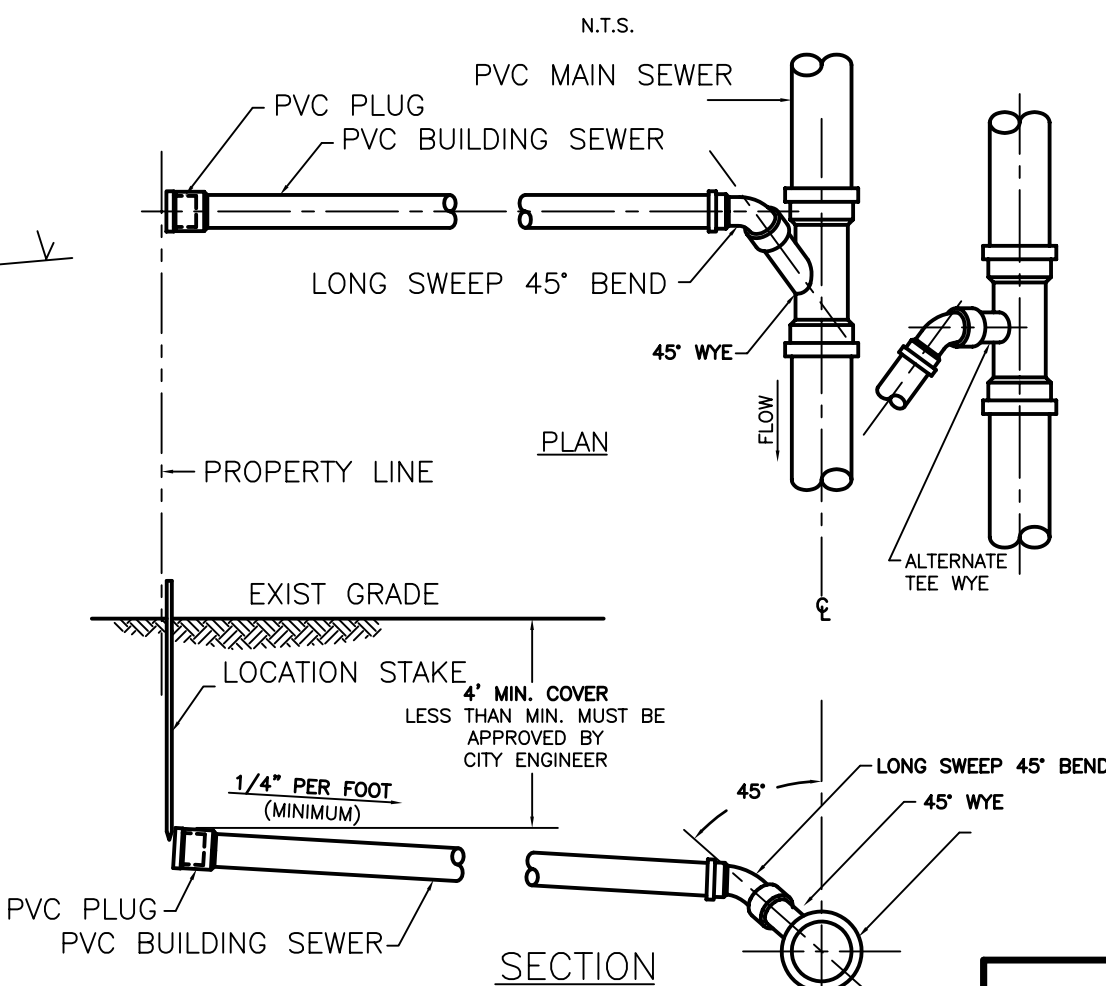
TYPICAL PARKING AND
DRIVEWAY PAVEMENT STRUCTURE



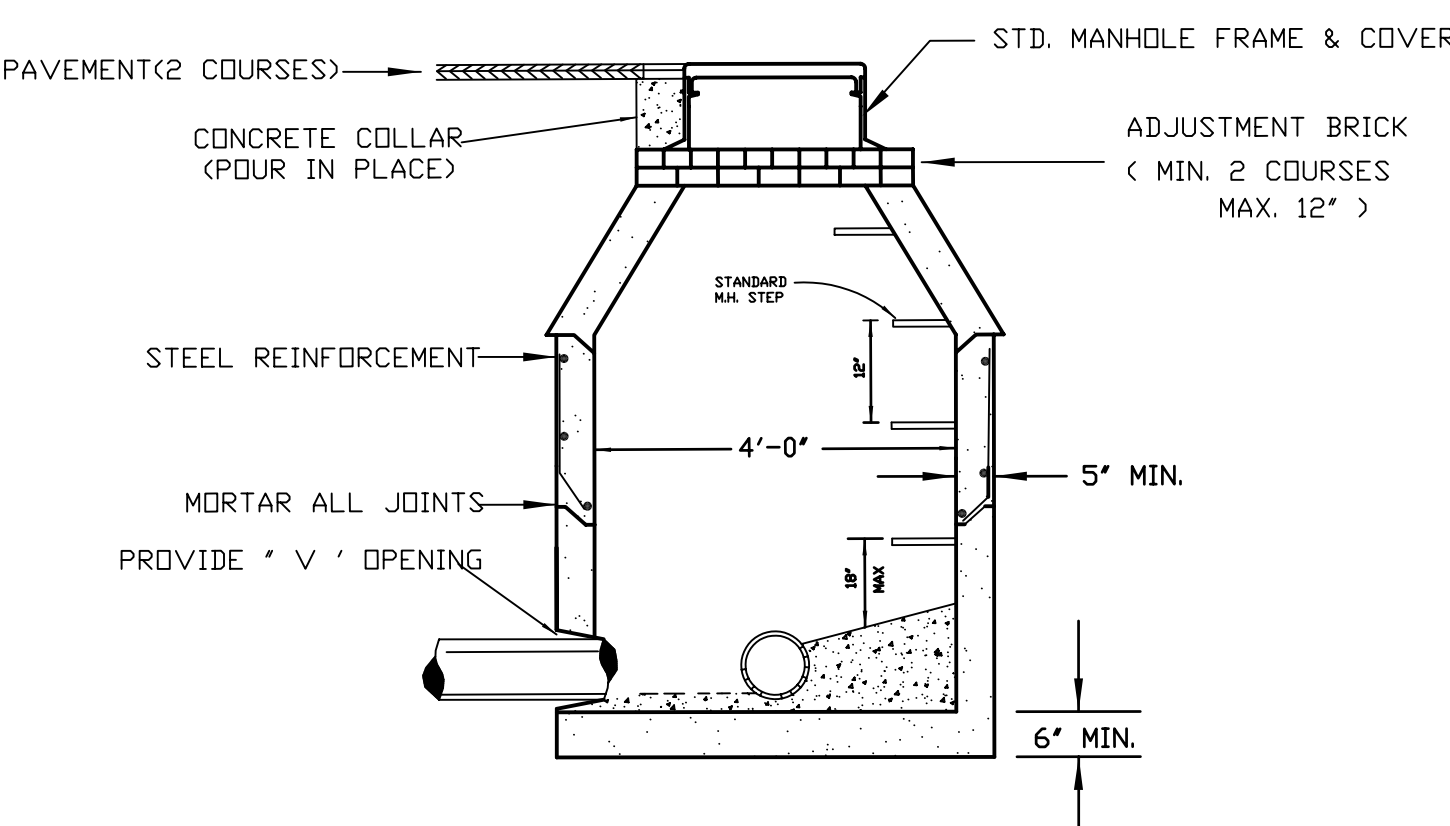
BITUMINOUS CONCRETE
CURB TYPE-2



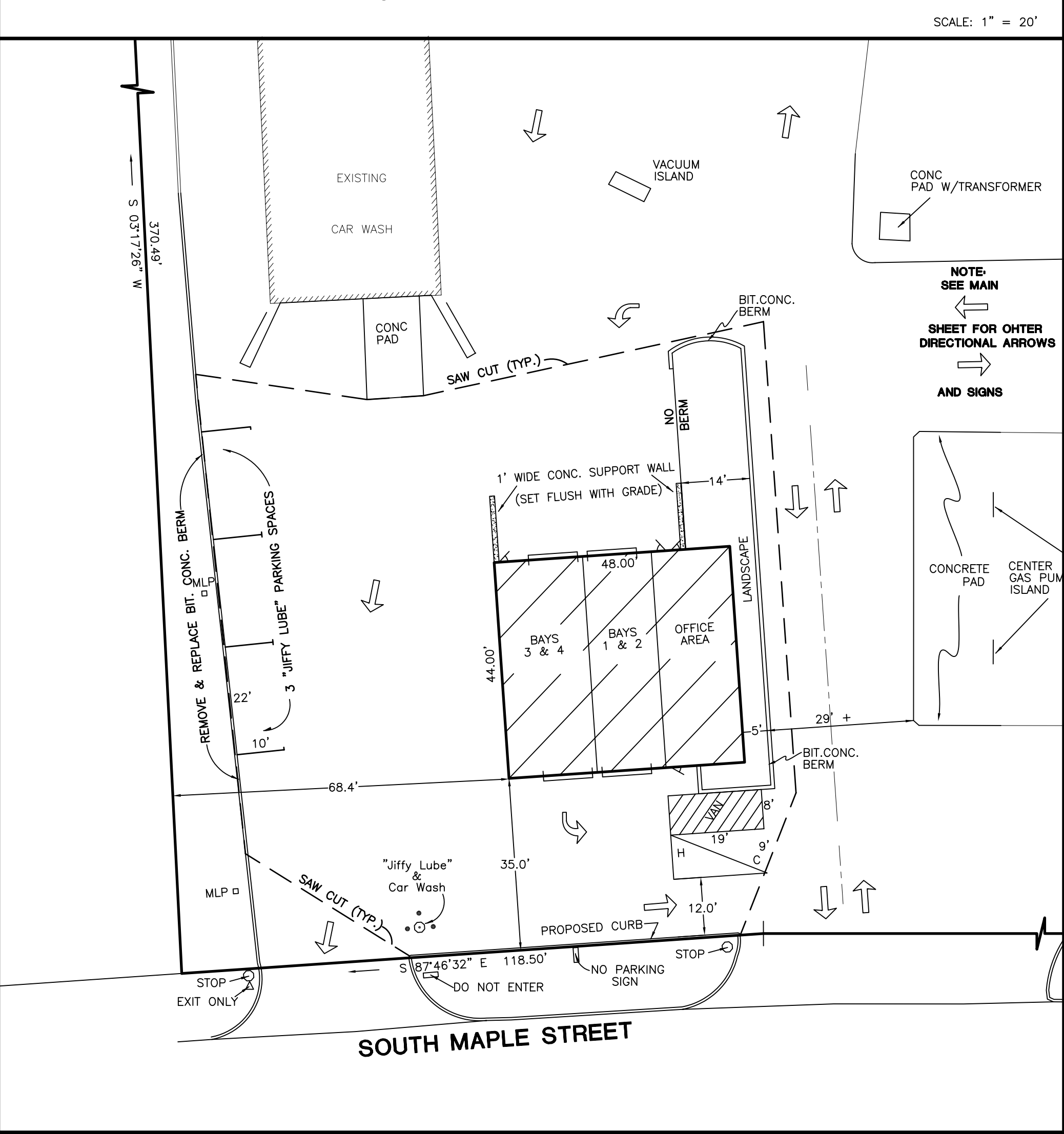
BUILDING SEWER CONNECTION



STANDARD SANITARY
SEWER MANHOLE



SITE LAYOUT PLAN - JIFFY LUBE



LEGEND

- C.B. CATCH BASIN
- GG GAS GATE
- WG WATER GATE
- U.POLE UTILITY POLE WITH NUMBER
- MLP METAL LIGHT POLE
- M.WELL MONITOR WELL
- 158--- EXISTING CONTOUR
- UGE UNDER GROUND ELECTRIC
- W WATER LINE
- G GAS LINE
- 157--- PROPOSED CONTOUR
- ← DIRECTIONAL ARROW
- STOP ○ PROPOSED "STOP"
- EXIT ONLY △ PROPOSED "EXIT ONLY"
- DO NOT ENTER
- PROPOSED BOLLARDS

PARKING REQUIREMENTS

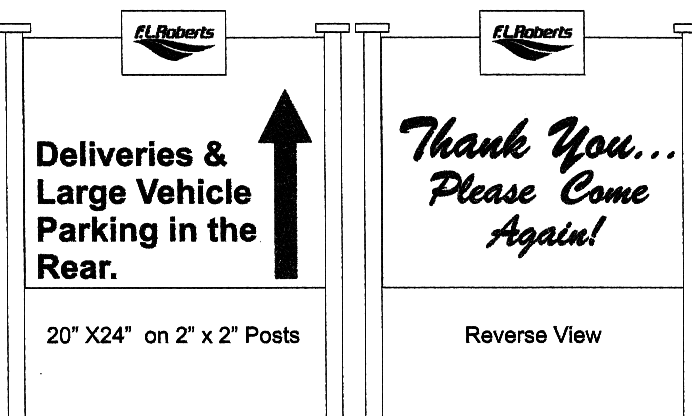
Existing Car Wash (per bay)	= 5
Existing Convenience Store (per 300 S.F.)	= 6
Proposed Service Bldg. (per 300 S.F.)	= 7
Total Required	= 18

EXISTING & PROPOSED PARKING

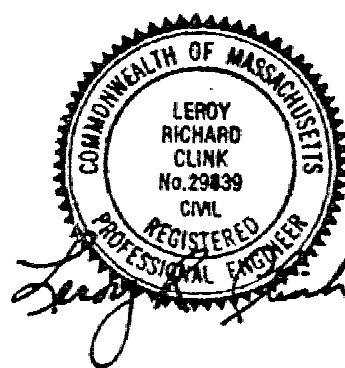
Existing Car Wash (Employee & Vacuum)	= 10+
Existing Convenience Store (w/1 van)	= 14
Gas Pump Islands parking	= 12
Proposed "Jiffy Lube" (w/1 van)	= 13
Total Shown	= 49

ZONING

	Required	Exist./Prop.
FRONTAGE AREA	100'	627'
FRONT YARD	17,500 S.F.	2.97 acres
SIDE YARD	30'	53'/35'
REAR YARD	15'	25'/68'
BLDG. COVERAGE	25%	80'+
BLDG. HEIGHT	2 1/2 Sty.	5.5% 1 Sty.



NOTE: UNDERGROUND UTILITIES ARE SHOWN FROM AVAILABLE UTILITY INFORMATION ONLY AND WILL REQUIRE ACTUAL FIELD VERIFICATION. MORE UNDERGROUND UTILITIES EXIST THAN ARE SHOWN, DIG SAFE AS WELL AS EACH UTILITY COMPANY SHALL BE NOTIFIED TO MARK THEIR UNDERGROUND LINES AT LEAST 72 HOURS PRIOR TO ANY EXCAVATION. DIG SAFE TEL. 1-888-344-7233



UPDATED: 6-08-2011 ADDED ADDITIONAL SIGNS

PROPOSED SITE PLAN
WESTFIELD, MASSACHUSETTS

FOR:
F.L. ROBERTS & COMPANY INC.
88-90 SOUTH MAPLE STREET
WESTFIELD, MA.

DATE: 4-15-2011
REV: 5-17-2011

SCALE: 1" = 20'
CHECKED: D.L.B.
C.A.D. T.J.A.
SHEET NO. 2 OF 2

D.L.B. BEAN, INC.
40 SCHOOL STREET
WESTFIELD, MASSACHUSETTS

SURVEYORS & ENGINEERS

ATTACHMENT II
APEX PCB SITE PLAN



184 HIGH STREET
SUITE 502
BOSTON MA 02110
(617) 728-0070

THIS DRAWING PREPARED BY APEX FOR THIS PROJECT IS AN INSTRUMENT OF APEX'S SERVICE, FOR USE SOLELY WITH RESPECT TO THIS PROJECT, AND APEX SHALL BE DEEMED THE AUTHOR OF THE DRAWING AND SHALL RETAIN ALL COMMON LAW, STATUTORY AND OTHER RESERVED RIGHTS WITH RESPECT THERETO, INCLUDING COPYRIGHT. THE DOCUMENTS SHALL NOT BE USED ON OTHER PROJECTS, FOR ADDITIONS TO THIS PROJECT OR FOR COMPLETION OF THIS PROJECT BY OTHERS, EXCEPT BY AGREEMENT IN WRITING AND WITH APPROPRIATE COMPENSATION TO APEX.

PREPARED FOR:
SUNOCO INC.

SITE LOCATION:
88-90 SOUTH MAPLE
STREET, WESTFIELD, MA

DRAWING TITLE:
SITE PLAN AND PROPOSED
SOIL REMOVAL AREAS

Note: Information adapted
from CEA 4/7/10 drawing
"FIGURE 3: PCB SOIL
BORING ASSESSMENT PLAN"

Scale: 1 INCH = 100 FEET

