

Auditor SubmittalType RTN AUL Review

Address Town

Date Rcvd Site Name Site Use

Date Screened LSP Name LSP Number

PRP Consultant

Notification OHM Typ Source

Risk Method Soil Class GW Class Media

Notes

On 3/31/23, LSP Ileen Gladstone submitted a Release Abatement Measure Plan for RTNs 3-15009 and 3-36365. The Site historically has been occupied by various industrial businesses since the 1880s, including machine shops and electrical cable companies. MassDEP originally assigned RTN 3-15009 to the Parcel P-3 site in 1997 for the identification of lead, TPH, and PAHs in soil above RCS-1 standards in the eastern portion of the Site. A lead hot spot was later identified in 2002 the southeast portion of the Site but was never excavated. The disposal site associated with RTN 3-15009 was designated as a Public Involvement Plan in 2005. The LSP states at least five USTs have previously serviced the site; it is unclear if they have been removed. The LSP also notes "many transformers" were located on the Site. A Temporary Solution Statement was filed in 2021 and proposed semi-annual site inspections, removal of a large soil mound on the northeast of the property under a RAM, and a decision about future redevelopment at the Site as potential next steps. The Temporary Solution states, based on a Method 1 Risk Characterization, a condition of No Significant Risk does not currently exist at the Site. The LSP states the RAM is being performed with a grant from the MassDevelopment Brownfields Redevelopment Fund.

An approximately 5-10 foot tall, 10,000 CY soil mound exists in the northeastern portion of the Site. The LSP states the mound contains metal, concrete, brick debris, tires and trash and is likely the result of unauthorized dumping on the property over 25 years ago. Soil samples taken from the mound in 2021 identified lead (461 mg/kg) and several PAHs above RCS-1 standards. TPH was detected but below reportable concentrations. Lead hot spot characterization in 2021 identified lead at 2020 mg/kg and a TCLP leachable lead concentration of 8.3 mg/L in the same area as the previous 13,000 mg/kg lead sample that was obtained in 2002. PCBs were not detected above laboratory reporting limits in 2021 sampling but were detected above the laboratory reporting limit in 2002 (0.068 mg/kg). Brick, concrete, pipes, and buried structures were identified during test pitting in 2017. No asbestos testing has occurred to date or is proposed.

MassDEP assigned RTN 3-36365 to Parcel P-3 in 2020 after receiving notification of TCE, cis-1,2-DCE, and vinyl chloride in groundwater above RCGW-2 thresholds in the western portion of the Site. Groundwater sampling performed in 2017 first identified TCE (96 ug/L), cis-1,2-DCE (64 ug/L), and vinyl chloride (6.3 ug/L) above RCGW-2 standards in the western portion of the Site. The reviewer notes this exceedance was reported to MassDEP in 2020,

and the PRP signed an ACO on 9/14/2020 associated with a NON for failure to notify MassDEP about the 120-day reportable condition. Groundwater has been measured at 8-13 feet bgs, and a groundwater elevation survey determined groundwater flow is south to north. The LSP attributes groundwater contamination to industrial site use and potential upgradient sources but has not identified any specific sources. GEI linked RTN 3-36365 to parent RTN 3-15009 when the Temporary Solution Statement was submitted in 2021.

In total, 450 CY of soil is proposed for off-site removal under the RAM. The LSP states that the volume of soil for off-site removal is limited by funding from the MassDevelopment grant. 200 CY of soil will be excavated and removed off-site from the mound. 250 CY of soil from the hotspot will be stabilized onsite using a “proprietary reagent” treatment in-situ, applied and mixed via bucket excavator with the target soil. The additive is a dry powder that must be mixed into soil and activated with water. The soil can be disposed offsite as non-hazardous waste following confirmatory sampling. The LSP states groundwater monitoring is not necessary during application of the remedial additive. All soils being sent off-Site will be live loaded onto trucks. The LSP states the mixing zone will be sprayed with water to suppress dust and to activate reagents. The hotspot excavation area will be backfilled with material from the mound that is considered suitable for reuse on Site. The LSP states further off-site disposal of soil from the mound may be required to reach Permanent Solution.

Excavated soil will be screened for VOCs using a PID. If material is inconsistent with pre-characterization, it will be stockpiled and characterized further. If stockpiling is necessary, materials will be segregated based on excavation location. Stockpiles will be placed on/covered with 6 mil polyethylene sheeting. Perimeter dust monitoring will occur with a dust action level of 150 ug/m³. Mechanical screening of soils will occur if necessary to reduce disposal volumes. Materials that do not exhibit signs of contamination will be disposed of as solid waste. Dewatering is not anticipated, but the LSP states that if necessary, dewatering effluent will be recharged on Site in accordance with MCP 40.0045(4). If evidence of a UST is detected, work will stop for screening and inspection by the LSP. The UST would then be excavated and disposed of properly. If a RC is found, the LSP states MassDEP will be notified.

The specifics of the “proprietary reagent” are unclear, but the application must comply with MCP 40.0046. Given that excavation/treatment may be conducted to 10 feet bgs, groundwater monitoring for the proprietary reagent may be necessary depending on the nature of the reagent. Specific dewatering plans may be necessary given the depth of excavation in the hotspot area. No groundwater remediation is proposed in the RAM. It is unclear if/when further remediation will occur to reach a Permanent Solution and a Condition of No Significant Risk.