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Innovative Environmental Solutions since 1899

N/A-L

SCANNED

**Boston Redevelopment Authority
Weston & Sampson Project No. 200317.A**

October 27, 2000

Bureau of Waste Site Cleanup
Department of Environmental Protection – Northeast Regional Office
205A Lowell Street
Wilmington, Massachusetts 01887

Re: **Phase II Comprehensive Site Assessment Scope of Work**
Boston Redevelopment Authority
Parcel P-3 *TREMONT/WHITTIER ST*
Roxbury, Massachusetts
Release Tracking Number (RTN) 3-15009

Dear Sir or Madam:

Weston & Sampson Engineers, Inc., on behalf of the Boston Redevelopment Authority (BRA), has prepared this Phase II – Comprehensive Site Assessment (CSA) Scope of Work (Phase II SOW). This Phase II SOW includes work required to fulfill the requirements of the Quality Assurance Project Plan (QAPP) to be submitted to the Environmental Protection Agency (EPA). The attached Phase II SOW has been prepared in accordance with the Massachusetts Contingency Plan (MCP), section 310 CMR 40.0834.

SITE LOCATION AND DESCRIPTION

Parcel P-3 is an approximately 9-acre parcel of land located on Tremont Street within the Campus High School Urban Renewal Area in Roxbury, Massachusetts (Figure 1 – Locus Map). Parcel P-3 has a history of mixed commercial and industrial use and formerly consisted of over 50 smaller lots. Only one building still remains: the Whittier Street Health Center (WSHC), located along the eastern portion of Parcel P-3 (Figure 2 – Site Plan). The Whittier Street Housing Development abuts Parcel P-3 to the east and Madison Park High School abuts Parcel P-3 to the south and west. The parking lot for the high school occupies the western and southwestern areas of Parcel P-3. Portions of Parcel P-3 are vacant lots, some of which are fenced and some of which have received illegal dumping of soil and solid waste.

Massachusetts (HQ)
Five Centennial Drive
Peabody, MA 01960-7985

Connecticut
2928 Main Street
Glastonbury, CT 06033-1093

Rhode Island
2348 Post Road, Suite 8
Warwick, RI 02886-2271

New Hampshire
195 Hanover Street
Portsmouth, NH 03801

Maine
PO Box 189
York, ME 03909

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REGULATORY STATUS

In early 1998, Weston & Sampson conducted a Phase I – Initial Site Investigation at Parcel P-3 that included a soil and groundwater sampling program. Results of the Phase I investigation identified total petroleum hydrocarbons (TPH), lead, and several polynuclear aromatic hydrocarbons (PAHs) exceeding MCP reportable concentrations (RCs). The Phase I report and Tier Classification submittal was issued to DEP on April 14, 1998. Parcel P-3 was classified as a Tier II site.

Following the initial Phase I investigation, 17 additional soil borings (B-101 to B-115) were advanced in areas at Parcel P-3 where RCs were exceeded. Fifteen of the 17 soil borings were advanced in the topographically elevated fill area behind the former Connolly's Tavern (Figure 2). TPH, several PAHs, and lead concentrations in soil from the top 9 feet in this area exceeded applicable Method 1 cleanup standards. In addition, PAH concentrations exceeded applicable Method 1 cleanup standards in all 15 soil borings in this area. Polychlorinated biphenyls (PCBs) were detected at in 2 of 6 samples at levels below the applicable RC.

Several PAHs also exceeded Method 1 cleanup standards in soil between 0 and 3 feet below pavement in the second area located behind the WSHC (B-116 and B-117). Select soil samples containing the highest lead concentrations were analyzed for the Toxicity Characteristic Leachate Procedure (TCLP) and resulting TCLP lead concentrations were below the hazardous waste threshold of 5.0 milligram per liter (mg/l). Concentrations of TPH, PAHs, and lead did not exceed Upper Concentration Limits (UCLs).

Based on the data collected to-date, contamination does not appear to have impacted the entire Parcel P-3, and the "disposal site" is delineated as two separate non-contiguous parcels. The disposal site occupies approximately 2.5 acres of the entire 9-acre Parcel P-3. The boundaries of the disposal site include an unpaved, approximately 1.5-acre area of topographically elevated fill area behind the former Connolly's Tavern and a paved, approximately 1-acre area behind the WSHC and bounded by the former Vernon and Hampshire Streets and Downing Street. However, there are data gaps in the 5.5-acre western portion of Parcel P-3 (currently used as parking for Madison Park High School). Additional data will be needed to eventually close out Parcel P-3 and to limit the disposal site to the areas described above.

Access to the 1.5-acre unpaved portion of the disposal site is restricted by the presence of a 6-foot high chain-link fence, installed by the BRA as a good faith attempt to restrict access to this portion of Parcel P-3. Exposure to contaminated soils in the 1-acre portion of the disposal site is eliminated due to paving. Currently there are no on-site workers at the disposal site. However, potential human receptors to the disposal site may include trespassers (both adult and child).

On April 13, 2000, Weston & Sampson submitted a Notification of Delay letter to DEP, notifying them of a delay in completion of the Phase II field investigation. The timing of the Phase II field investigation is discussed in the Schedule section of this letter.

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PHASE II SCOPE OF WORK

The overall objective of the Phase II CSA is to delineate the horizontal and vertical extent of contamination, and to evaluate whether a condition of "no significant risk" exists under current and future Site uses. A detailed Phase II SOW is as follows:

- 1.0 Drilling:** A subsurface field investigation will be performed to gather additional soil analytical data. Additional soil borings are needed to characterize the contaminated fill and native soil layers within three areas:

Disposal Site: Behind former Connolly's Tavern

In this area, up to one deep soil boring, designated B-201(D), will be drilled to assess the vertical extent of contamination. The deep boring will be drilled to approximately 25 feet below grade or approximately 5 feet into the lower native unit.

Disposal Site: Behind the WSHC

In this area, up to three shallow soil borings, designated B-202(S) through B-204(S), will be drilled. Soil borings will be drilled to approximately 10 feet below grade or until the contact between the fill and lower native layer (peat, silt, and/or clay) is encountered (estimated to be 8.5 feet below grade).

Outside Disposal Site: Western portion of Parcel P-3

In this area, up to three soil borings (B-205 through B-207) will be drilled to approximately 5 feet below grade.

All soil borings, except the deep borings, will be drilled using 4¼-inch inner diameter (ID) hollow-stem auger (HSA) drilling techniques. Deep soil boring B-201(D) will be drilled using drive and wash (DW) casing drilling techniques to prevent cross-contamination between the upper fill and lower native soil layer.

All borings will be backfilled with drill cuttings from the same hole and to the same depth from which they came. Any excess cuttings will be temporarily placed in a 55-gallon drum and labeled "non-hazardous waste" for later testing and disposal off-site.

During drilling, soil samples will be collected at five-foot intervals using a stainless-steel split-spoon sampler. All soils will be field screened for total volatile organic compounds (VOCs) using a photoionization detector (PID) in accordance with DEP's Jar Headspace Screening Method. All drilling activities will be supervised by a Weston & Sampson field geologist or engineer.

- 2.0 Surficial Soil and Stockpile Sampling and Analysis:** Weston & Sampson will collect up to 4 surficial (top 6 inches) soil samples (plus one duplicate for each parameter) from the 1.5-acre area of elevated fill behind the former Connolly's Tavern. In addition, we will collect approximately 3 samples from the soil/debris stockpiles located behind the WSHC and

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submit them for laboratory analysis of volatile petroleum hydrocarbons (VPH), EPH with target PAHs, and RCRA 8 metals.

To fulfill QAPP requirements, Weston & Sampson will collect one duplicate sample and one methanol trip blank sample will accompany all of the surface soil and stockpile samples.

1.5-Acre Unpaved Area (behind Former Connelly's Tavern)

Sample Numbers	Sample Unit	No. of Samples	Sampling Parameters
SS-1 to SS-4	Surficial Soil	4	EPH with PAHs, Lead

1.0-Acre Paved Area (behind WSHC)

Sample Numbers	Sample Unit	No. of Samples	Sampling Parameters
Soil Stockpiles	Fill	3	VPH, EPH with PAHs, PCBs, RCRA 8 Metals

- 3.0 Soil Boring Sampling and Analysis:** Weston & Sampson will collect a total of 8 soil boring samples (plus 1 duplicate for each parameter) for the analysis of extractable petroleum hydrocarbons (EPH), including target PAHs, and lead. Samples will be collected from the following geologic units and analyzed as follows:

1.5-Acre Unpaved Area (behind Former Connelly's Tavern)

Sample Numbers	Sample Unit	No. of Samples	Sampling Parameters
B-201D	Fill	1	EPH with PAHs, Lead
B-201D	Native Soil	1	EPH with PAHs, Lead

1.0-Acre Paved Area (behind WSHC)

Sample Numbers	Sample Unit	No. of Samples	Sampling Parameters
B-202 to B-204	Fill	3	EPH with PAHs, Lead

5.5-Acre Paved Area in Western Portion of Property

Boring/Sample Numbers	Sample Unit	No. of Samples	Sampling Parameters
B-205(S) @ WS-6	Fill	1	EPH with PAHs, Lead
B-206(S) @ WS-5	Fill	1	EPH with PAHs, Lead
B-207(S) @ WS-11	Fill	1	EPH with PAHs, Lead

To fulfill QAPP requirements, Weston & Sampson will collect one duplicate sample. Quality assurance/quality control samples may be adjusted based on EPA's approval of the QAPP.

The exact depth of fill and native soil samples collected will depend on the actual depth at which these units are encountered in the field during drilling. Based on data collected during the Phase I, the thickness of the fill in the 1.0-acre paved area behind WSHC is approximately 8.5 feet thick. The thickness of the fill in the 6.5-acre western paved portion of the property varies between approximately 8.5 to 17 feet and is absent in some locations (i.e., WS-7).

- 4.0 Surveying:** Following completion of the drilling program, Weston & Sampson will survey all soil borings and surficial sampling locations. In addition, the ground elevation at each boring will also be surveyed. The new soil boring and sampling locations will be plotted on the site plan.
- 5.0 Groundwater Sampling:** Based on accessibility and site coverage, Weston & Sampson will sample six of the twelve existing monitoring wells (WS-1 through WS-12). Groundwater will be analyzed for VPH, EPH with target PAHs, and dissolved lead. Samples will be collected using a peristaltic pump and low-flow sampling techniques. Weston & Sampson will also ensure that one water trip blank sample accompanies all the groundwater VPH samples.
- No field rinse blank sample is required as a quality check on groundwater sampling equipment because the equipment will be dedicated to each sampling location. At this time we are not recommending collection of a duplicate sample as previously no contaminants were detected in groundwater.
- 6.0 Risk Characterization:** A Method 3 risk characterization will be performed to evaluate whether a condition of "no significant risk" exists at the Site for current and future use conditions.
- 7.0 Phase II CSA Report:** A Phase II CSA report will be prepared to present the results of field investigation, QAPP findings, and risk characterization. The report will include recommendations for additional field work, if required, or other additional response actions needed to achieve Site closure under the MCP.

SCHEDULE

The subsurface investigation (Tasks 1.0 through 5.0) is scheduled to occur in November and December 2000. As this assessment is being funded through an EPA Brownfields Grant, the project's schedule is dependent on EPA's approval of the QAPP, which we assume will occur in mid-late November. At this time, Weston & Sampson anticipates completing the Method 3 Risk Characterization (Task 6.0) in January/February 2001. The results of the subsurface investigation and risk characterization will be used to prepare the Phase II CSA report (Task 7.0) by late February or early March 2001.

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If you have any questions concerning the Phase II SOW, please contact me at (978) 532-1900.

Very truly yours,

WESTON & SAMPSON ENGINEERS, INC.



Prasanta K. Bhunia, Ph.D., LSP
Vice President

cc: Noah Luskin, BRA
Richard Mertens, BRA
Thomas Ahern, BRA
File

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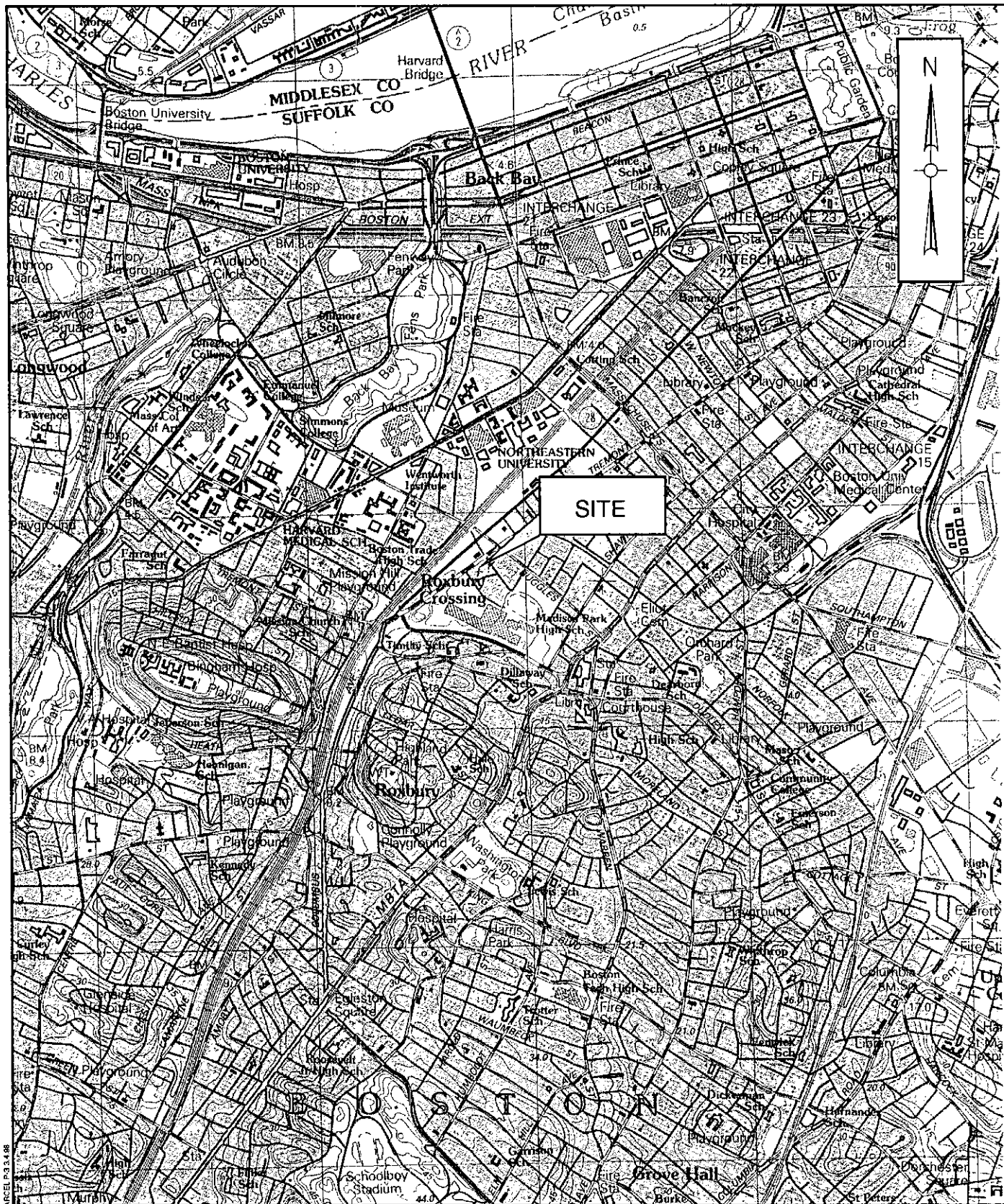
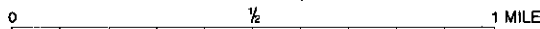


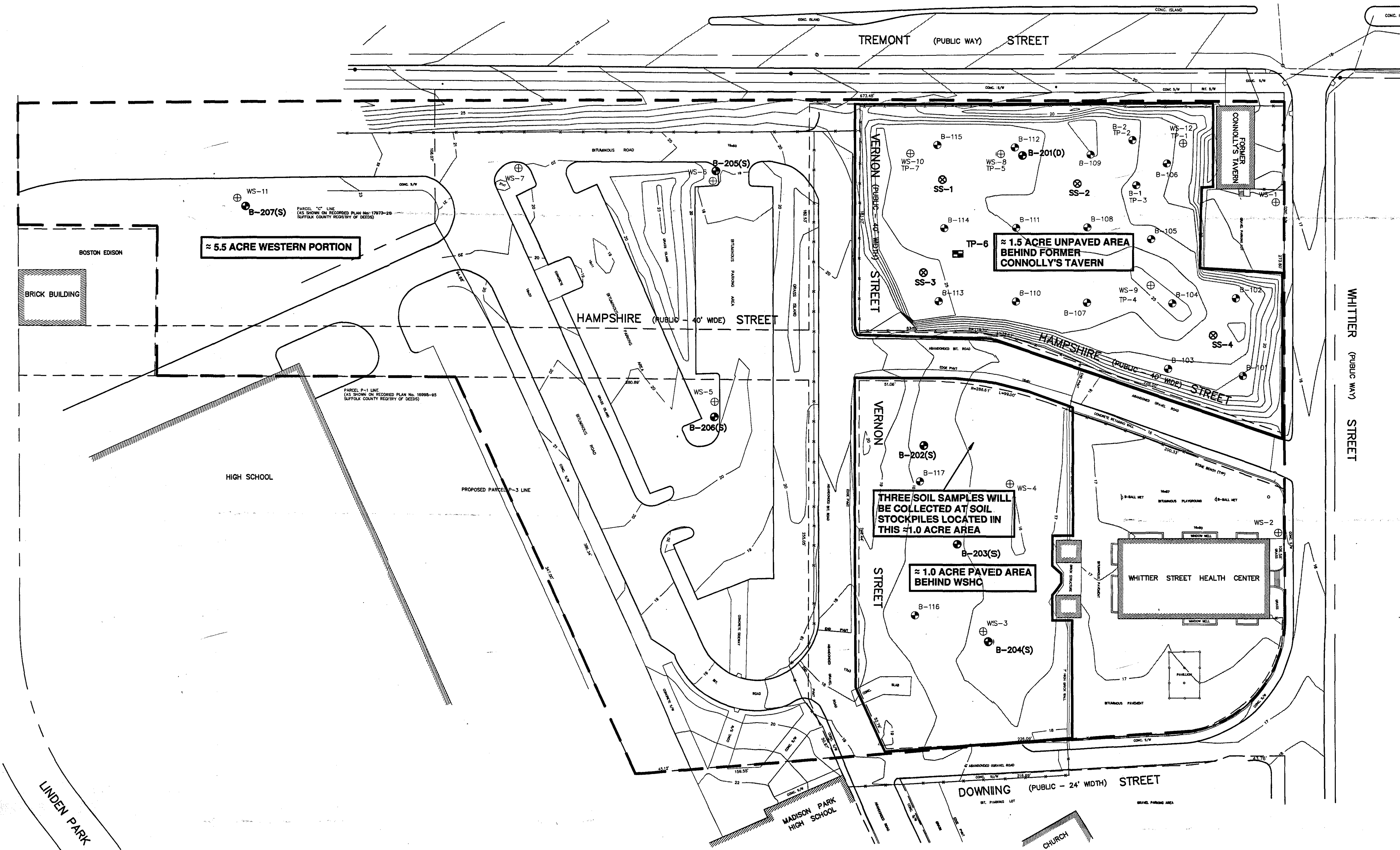
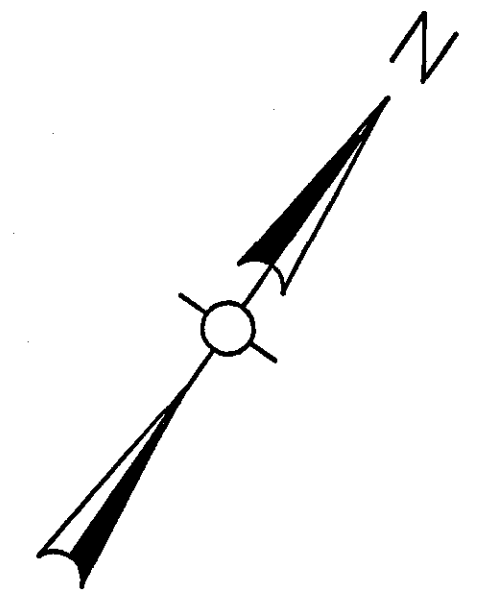
FIGURE 1
 BRA/EDIC -- PARCEL P-3; ROXBURY, MASSACHUSETTS
 LOCUS MAP

SOURCE: USGS 7.5 x 15 MINUTE SERIES BOSTON SOUTH, MASS. QUAD, 1987

SCALE: 1 : 25,000



MapWindow: \\MUNICIPAL\Local MapServer\EDIC PARCEL P-3 3.4.88



- LEGEND:**
- ⊕ B-1 SOIL BORING - PHASE I (WSE, 1998)
 - ⊕ WS-1 GROUNDWATER MONITORING WELL
 - ▣ TP-6 TEST PIT
 - - - P-3 PARCEL BOUNDARY
 - x - x - CHAIN LINK FENCE
 - - - DISPOSAL SITE BOUNDARY

- PROPOSED SOIL BORING AND SAMPLING LOCATIONS: (APPROXIMATE)**
- ⊗ SS-1 SURFICIAL SOIL SAMPLING LOCATION
 - ⊕ B-201(D) DEEP SOIL BORING
 - ⊕ B-203(S) SHALLOW SOIL BORING

THREE SOIL SAMPLES WILL BE COLLECTED AT SOIL STOCKPILES LOCATED IN THIS ~1.0 ACRE AREA

~ 1.0 ACRE PAVED AREA BEHIND WSHC

~ 5.5 ACRE WESTERN PORTION

~ 1.5 ACRE UNPAVED AREA BEHIND FORMER CONNOLLY'S TAVERN

FIG 2
 ROXBURY, MASSACHUSETTS
 BRA PARCEL P-3
 PROPOSED DRILLING AND SAMPLING LOCATIONS
 OCTOBER, 2000 SCALE: 1"=40'
 WESTON & SAMPSON ENGINEERS, INC.

SOURCES:
 1. PLAN OF LAND IN BOSTON PARCELS P-3X, P-3Y, P-3Z, NOV. 1996 GREEN INTERNATIONAL AFFILIATES, INC.
 2. BRA RUGGLES PLAZA PLAN

HY762001053\PARCEL-P-3



COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT

Release Tracking
Number

3 - 15009

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

A. SITE LOCATION:

Site Name: (optional) Parcel P-3

Street: TREMONT + WHITTIER STREETS

Location Aid: UTM's: 4688700mN, 327800mE

City/Town: ROXBURY

ZIP Code: 02120-0000

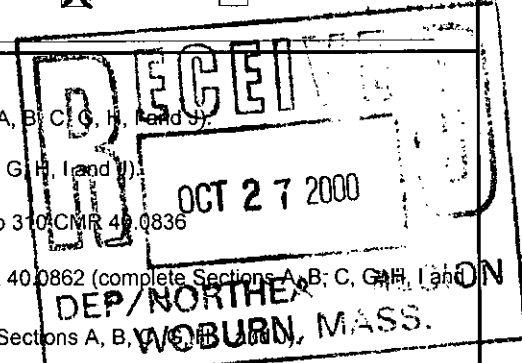
Related Release Tracking Numbers that this Form Addresses: NA

Tier Classification: (check one of the following) Tier IA Tier IB Tier IC Tier II Not Tier Classified

If a Tier I Permit has been issued, state the Permit Number: NA

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

- Submit a Phase I Completion Statement, pursuant to 310 CMR 40.0484 (complete Sections A, B, C, G, H, I and J).
- Submit a Phase II Scope of Work, pursuant to 310 CMR 40.0834 (complete Sections A, B, C, G, H, I and J).
- Submit a final Phase II Comprehensive Site Report and Completion Statement, pursuant to 310 CMR 40.0836 (complete Sections A, B, C, D, G, H, I and J).
- Submit a Phase III Remedial Action Plan and Completion Statement, pursuant to 310 CMR 40.0862 (complete Sections A, B, C, G, H, I and J).
- Submit a Phase IV Remedy Implementation Plan, pursuant to 310 CMR 40.0874 (complete Sections A, B, C, G, H, I and J).
- Submit an As-Built Construction Report, pursuant to 310 CMR 40.0875 (complete Sections A, B, C, G, H, I and J).
- Submit a Phase IV Final Inspection Report and Completion Statement, pursuant to 310 CMR 40.0878 and 40.0879 (complete Sections A, B, C, E, G, H, I and J).
- Submit a periodic Phase V Inspection & Monitoring Report, pursuant to 310 CMR 40.0892 (complete Sections A, B, C, G, H, I and J).
- Submit a final Phase V Inspection & Monitoring Report and Completion Statement, pursuant to 310 CMR 40.0893 (complete Sections A, B, C, F, G, H, I and J).



You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.

C. RESPONSE ACTIONS: NA

- Check here if any response action(s) that serves as the basis for the Phase submittal(s) involves the use of Innovative Technologies. (DEP is interested in using this information to create an Innovative Technologies Clearinghouse.)
- Describe Technologies: _____

D. PHASE II COMPLETION STATEMENT: NA

Specify the outcome of the Phase II Comprehensive Site Assessment:

- Additional Comprehensive Response Actions are necessary at this Site, based on the results of the Phase II Comprehensive Site Assessment.
- The requirements of a Class A Response Action Outcome have been met and a completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.
- The requirements of a Class B Response Action Outcome have been met and a completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.
- Rescoring of this Site using the Numerical Ranking System is necessary, based on the results of the final Phase II Report.

E. PHASE IV COMPLETION STATEMENT: NA

Specify the outcome of Phase IV activities:

- Phase V operation, maintenance or monitoring of the Comprehensive Response Action is necessary to achieve a Response Action Outcome. (This site will be subject to a Phase V Operation, Maintenance and Monitoring Annual Compliance Fee.)
- The requirements of a Class A Response Action Outcome have been met. No additional operation, maintenance or monitoring is necessary to ensure the integrity of the Response Action Outcome. A completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.
- The requirements of a Class C Response Action Outcome have been met. No additional operation, maintenance or monitoring is necessary to ensure the integrity of the Response Action Outcome. A completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

SECTION E IS CONTINUED ON THE NEXT PAGE



COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT

Release Tracking
Number

3 - 15009

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

E. PHASE IV COMPLETION STATEMENT: (continued) **NA**

The requirements of a Class C Response Action Outcome have been met. Further operation, maintenance or monitoring of the remedial action is necessary to ensure that conditions are maintained and that further progress is made toward a Permanent Solution. A completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

Indicate whether the operation and maintenance will be Active or Passive. (Active Operation and Maintenance is defined at 310 CMR 40.0006.):

Active Operation and Maintenance Passive Operation and Maintenance

(Active Operation and Maintenance makes the Site subject to a Post-RAO Class C Active Operation and Maintenance Annual Compliance Fee.)

F. PHASE V COMPLETION STATEMENT: **NA**

Specify the outcome of Phase V activities:

The requirements of a Class A Response Action Outcome have been met and a completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

The requirements of a Class C Response Action Outcome have been met. No additional operation, maintenance or monitoring is necessary to ensure the integrity of the Response Action Outcome. A completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

The requirements of a Class C Response Action Outcome have been met. Further operation, maintenance or monitoring of the remedial action is necessary to ensure that conditions are maintained and that further progress is made toward a Permanent Solution. A completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

Indicate whether the operation and maintenance will be Active or Passive. (Active Operation and Maintenance is defined at 310 CMR 40.0006.):

Active Operation and Maintenance Passive Operation and Maintenance

(Active Operation and Maintenance makes the Site subject to a Post-RAO Class C Active Operation and Maintenance Annual Compliance Fee.)

G. LSP OPINION:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with the information contained in this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

> If Section B indicates that a Phase I, Phase II, Phase III, Phase IV or Phase V Completion Statement is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> If Section B indicates that a Phase II Scope of Work or a Phase IV Remedy Implementation 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 indicates that an As-Built Construction Report or a Phase V Inspection and Monitoring Report is 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) complies(y) 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.

Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

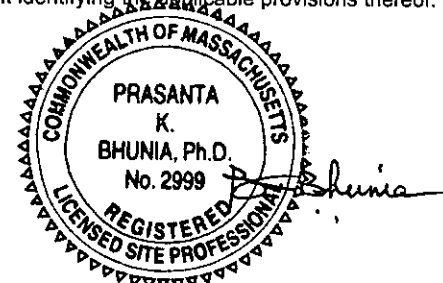
LSP Name: Prasanta Bhunia LSP #: 2999 Stamp:

Telephone: 978-532-1900 Ext.: 2287

FAX: 978-977-0100
(optional)

Signature: P. Bhunia

Date: 10/27/00





COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT

Release Tracking
Number

3 - 15009

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

H. PERSON UNDERTAKING RESPONSE ACTION(S):

Name of Organization: Boston Redevelopment Authority
Name of Contact: Mark Maloney Title: Director
Street: One City Hall Square
City/Town: Boston State: MA ZIP Code: 02201-1007
Telephone: 617 722-4300 Ext.: _____ FAX: _____
(optional)
 Check here if there has been a change in the person undertaking the Response Action.

I. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RESPONSE ACTION(S): (check one)

RP or PRP Specify Owner Operator Generator Transporter Other RP or PRP: _____
 Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
 Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
 Any Other Person Undertaking Response Action Specify Relationship: _____

J. CERTIFICATION OF PERSON UNDERTAKING RESPONSE ACTION(S):

I, Mark Maloney, 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 those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: [Signature] Title: Director
(Signature)
For Boston Redevelopment Authority Date: 10/27/00
(print name of person or entity recorded in Section H)

Enter address of the person providing certification, if different from address recorded in Section H:
Street: _____
City/Town: _____ State: _____ ZIP Code: _____
Telephone: _____ Ext. _____ FAX: (optional) _____

YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.