Haley & Aldrich, Inc.
465 Medford St.
Suite 2200
Boston, MA 02129-1400

Tel: 617.886.7400
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Haley-Aldrich.com

HALEY& ALDRICH

31 January 2007
File No. 12671-400

Massachusetts Department of Environmental Protection (MassDEP)
Northeast Regional Office
205B Lowell Street
Wilmington, Massachusetts 01887

Attention: Ladies and Gentlemen

Subject: LSP of Record Resignation
Tombarello and Sons Inc.
207 Marston Street
Lawrence, Massachusetts
RTN 3-0018126

Ladies and Gentlemen: SL = Thompson

This letter is written pursuant to the Massachusetts Contingency Plan at 310 CMR 40.0169(2) (MCP) to notify MassDEP that the undersigned hereby resigns as LSP of Record for the above-referenced site as of the date of this letter. Haley & Aldrich, Inc. has not performed MCP response actions on behalf of American Recycling of Mass. Inc. d/b/a John C. Tombarello & Sons (American) in connection with RTN 3-0018126 and ACOP-NE-00-9013-123 since July 2001, when directed to stop work by ECS Claims Administrators representing Reliance Insurance Company (Reliance). However, our engagement with American was never formally terminated.

We understand James M. Grifoni and Rolling Meadow Farms Inc. of North Andover, Massachusetts (Grifoni) are potential successors in title to American for the subject property. Earlier this week we discovered that the MassDEP on-line Reportable Release Lookup database lists a new Reportable Release (RNF) under RTN 3-0018126, dated 4 October 2006. Haley & Aldrich, Inc. has not been retained by Grifoni or any other successor Potentially Responsible Party (PRP) to conduct MCP response actions at the subject site, and we have not been informed of the PRP/LSP associated with the recent RNF.

Sincerely yours,
HALEY & ALDRICH, INC.

Elliot I. Steinberg, P.E., LSP #9663
Vice President

G:\12671\400\LSP Resignation-f.doc

SCANNED

Zupkus, John (DEP)

From: Johnson, Stephen (DEP)
Sent: Tuesday, September 26, 2006 4:33 PM
To: Fagan, Joanne (DEP)
Cc: Ferson, Joseph (DEP); Coletta, Edmund (DEP); Thompson, Valerie (DEP); Zupkus, John (DEP)
Subject: RE: Fmr. Tombarello's site

Joanne, do you know to whom the letter was sent? If it was sent to the Commissioner's office in Boston, we should give Arleen/Ed a head's up and tell them we're all over this one. SJ

From: Fagan, Joanne (DEP)
Sent: Tuesday, September 26, 2006 12:57 PM
To: Johnson, Stephen (DEP); Thompson, Valerie (DEP); Zupkus, John (DEP)
Cc: Ferson, Joseph (DEP); Coletta, Edmund (DEP)
Subject: Fmr. Tombarello's site

The City of Lawrence just informed me that this story on the Tombarello site is on the front page of the Eagle Tribune.

Steve, I will be attending a meeting with the City and the mortgage holder - Jim Grifoni, tomorrow a.m. in Lawrence.

http://www.eagletribune.com/local/local_story_268150333/resources_printstory

Zupkus, John (DEP)

From: Fagan, Joanne (DEP)
Sent: Tuesday, September 26, 2006 12:57 PM
To: Johnson, Stephen (DEP); Thompson, Valerie (DEP); Zupkus, John (DEP)
Cc: Ferson, Joseph (DEP); Coletta, Edmund (DEP)
Subject: Fmr. Tombarello's site

The City of Lawrence just informed me that this story on the Tombarello site is on the front page of the Eagle Tribune.

Steve, I will be attending a meeting with the City and the mortgage holder - Jim Grifoni, tomorrow a.m. in Lawrence.

http://www.eagletribune.com/local/local_story_268150333/resources_printstory

The Eagle-Tribune online

City asks state to help close former Tombarello junkyard

By Mark E. Vogler
Eagle-Tribune

LAWRENCE - The city is trying to close a truck driving school at a former junkyard on Marston Street, claiming the activity poses health problems at the contaminated site.

City Council President Patrick Blanchette has asked the state Department of Environmental Protection for help after the North Andover developer who holds a mortgage note to the site defied an order to stop all activity at 207 Marston St. and lock the front gate so people don't wander onto the property.

"I call upon your agency to please use any and all means allowed under law to close this site down and remove any individuals from the location not legally allowed to be there," Blanchette wrote in letter to the DEP.

"On any given day trucks are entering the contaminated site and exiting onto a public roadway, which causes a great public alarm. The site as you know is directly across from an elementary school and I fear for the children's health and safety at this point in time," Blanchette said.

The former John C. Tombarello & Sons Salvage Co. site is across the street from the city's Parthum School. State and federal environmental officials have been monitoring the property for several years because some of the soil was contaminated by polychlorinated biphenyls, known as PCBs.

Used as lubricants in electrical transformers, PCBs are an oily mixture of chemicals that are believed to cause cancer.

James Grifoni, the North Andover developer named in the cease and desist order filed by the city's Inspectional Services Department, said he has refused to comply with the order because he's appealing it and believes it's flawed.

Grifoni said he plans to meet with city officials on Wednesday in an attempt to settle their dispute.

"The outcome of that meeting will determine whether the truck school just folds its tent and goes home," Grifoni said.

"If we can't come to a reasonable agreement at that meeting, the trucks will be pulled and the gate will be locked. I'm more than happy to do that," he said.

But Grifoni, a Lawrence businessman who owns the Big-N-Beefy restaurant on Broadway near the Methuen line, insists there is no public health threat.

"There's five or six locations where the contamination is, and it's in the ground. And it's all the way in the back corner of the property. There is no hazardous material leaving the site," he said in an interview Friday.

"The paved parking lot where the driving school operates is not contaminated, so it wouldn't expose people to any hazardous materials buried at the site," he said.

An official of the U.S. Environmental Protection Agency who has been working with the city on issues related to the Marston Street site said federal law prohibits use of contaminated property until the EPA approves a cleanup plan.

"Any portion of the property must be cleaned up to meet federal standards before it can be used," said Kimberly Tisa, the PCBs coordinator for the New England region.

"We have not approved a cleanup plan for the site," she said.

Officials at the EPA and the DEP are aware of the city's concerns and are reviewing the situation, Tisa said.

Representatives of both agencies told Grifoni he needed their written permission to use the site.

Grifoni said he's submitted a cleanup plan to the EPA and is awaiting its approval.

In addition to seeking help from those environmental agencies, Blanchette said he will ask the City Attorney to "aggressively go after" $200,000 in back taxes owed on the property.

"This property should be placed in land court in efforts to collect delinquent taxes," Blanchette said.

Grifoni said he shouldn't be held responsible because American Recycling of Mass. Inc., "abandoned the property and took off."

"I have no personal ownership of the property, and the taxes are being owed by American recycling," Grifoni said.

"When we get the proper approval, we'll probably foreclose on the property. American Recycling still owns the property. I own the mortgage," he said.

Earlier this year, Grifoni considered the Marston Street site as a potential truck stop, but dropped those plans because of neighborhood opposition.

Besides completing the environmental cleanup, Grifoni hopes to find a buyer for the property or a compatible user who will enter into a lease agreement.

"I'm just trying to do the right thing here. I don't want to do anyone any harm," he said.

Based on ongoing problems the city has had with Grifoni, Blanchette questions his intentions.

"Mr. Grifoni pays no taxes to the city, but yet endangers the citizenry of our city by his actions," said Blanchette, who represents the District A Prospect Hill Neighborhood, where the Marston Street property is located.

Zupkus, John (DEP)

From: Fagan, Joanne (DEP)
Sent: Monday, August 28, 2006 3:51 PM
To: Thompson, Valerie (DEP)
Cc: Zupkus, John (DEP)
Subject: FW: Meeting in Lawrence regarding Tombarello's

Val,

John & I will be going to this meeting with the City on Wed. at 10:30. Please feel free to join us. It will be at the Planning Dept., 147 Haverhill St., Lawrence.

From: Caroline Ganley [mailto:CGanley@CITYOFLAWRENCE.COM]
Sent: Monday, August 28, 2006 1:53 PM
To: Fagan, Joanne (DEP)
Subject: RE: Meeting in Lawrence regarding Tombarello's

Thanks Joanne – I have forwarded this on and will advocate for us to meet with you on Wednesday. Will get back to you.

From: Fagan, Joanne (DEP) [mailto:Joanne.Fagan@state.ma.us]
Sent: Thursday, August 24, 2006 10:52 AM
To: Caroline Ganley
Cc: tisa.kimberly@epa.gov; Zupkus, John (DEP); Thompson, Valerie (DEP)
Subject: Meeting in Lawrence regarding Tombarello's

Hi Caroline,

EPA and MassDEP are available to meet with the City in Lawrence next Wednesday the 30th at 10:30 am. If that doesn't work for you, we are also available on Monday the 28th at 2:00 pm. Please let us know if either of these times works for the City. Thanks

MassDEP - Northeast Regional Office
Bureau of Waste Site Cleanup
205B Lowell Street
Wilmington, MA 01887
Phone: 978-694-3390
FAX #: 978-694-3496

Zupkus, John (DEP)

From: Fagan, Joanne (DEP)
Sent: Thursday, August 24, 2006 11:52 AM
To: 'cganley@cityoflawrence.com'
Cc: Kimberly Tisa (tisa.kimberly@epa.gov); Zupkus, John (DEP); Thompson, Valerie (DEP)
Subject: Meeting in Lawrence regarding Tombarello's

Hi Caroline,

EPA and MassDEP are available to meet with the City in Lawrence next Wednesday the 30th at 10:30 am. If that doesn't work for you, we are also available on Monday the 28th at 2:00 pm. Please let us know if either of these times works for the City. Thanks

****

MassDEP - Northeast Regional Office
Bureau of Waste Site Cleanup
205B Lowell Street
Wilmington, MA 01887
phone: 978-694-3390
FAX #: 978-694-3496

Zupkus, John (DEP)

From: Fagan, Joanne (DEP)
Sent: Thursday, August 24, 2006 9:47 AM
To: Kimberly Tisa (tisa.kimberly@epa.gov); Zupkus, John (DEP)
Cc: Thompson, Valerie (DEP)
Subject: Tombarello's, Lawrence

I have been periodically communicating with Caroline Ganley, Director of Inspection Services in Lawrence, regarding the Tombarello's site. Recently, she had made a comment that she was unsure if the City would provide a permit to James Grifoni to operate the Tractor Trailer Training operations that he is proposing. Since we have received Mr. Grifoni's proposal to conduct sampling of the front site area, decon heavy equipment, etc., I placed a call to Caroline to inquire of the City's position. I don't want to be wasting our time on this proposal to lease the property if the City is not going to allow it either way.

Kim, John has inspected the site recently to check on the fence patching. One spot still needs to be repaired and Mr. Grifoni's consultant has been notified. John and the City have observed tractor trailers already being parked at the site, with the gate wide open and unattended. Caroline and I thought it would be helpful if MassDEP & EPA met with the City to share information about this site and coordinate efforts.

Please let me know if you are available to meet with Lawrence some time over the next two weeks. If so, let me know of possible dates & times and I'll set us up with the City.

Thanks - Joanne

****

MassDEP - Northeast Regional Office
Bureau of Waste Site Cleanup
205B Lowell Street
Wilmington, MA 01887
phone: 978-694-3390
FAX #: 978-694-3496

From: Hoskins, Pamela [Pam.Hoskins@westonsolutions.com]
Sent: Thursday, July 27, 2006 8:38 AM
To: Zupkus, John (DEP)
Cc: james.grifoni@comcast.net; Ricker, Jim
Subject: Tombarello Informations

John:

Hello. After our talk on Tuesday, I called Mr. Grifoni and found out the following just FYI.

1) The fence repairs as discussed between you and Mr. Grifoni will be done next week. He spoke to his contractor on Monday and it is all set.

2) I mentioned the concerns you had about the cylinders at the front of the site. Mr. Grifoni checked with his metal reclamation folks, and found out that these are oxygen cyclinders that they use in their metal cutting operations. The "release" you heard during your site visit was a standard safety measure wherein as soon as the internal pressure of the tanks builds to a certain psi, a pressure adjustment automaticlly occurs via a relief valve. Standard protocol and nothing toxic involved. The relief valve also mitigates the danger for a tank "shooting off" and posing a physical hazard. The tanks will leave the site with the metal reclaimers when they leave.

Hope this answers you questions.

Respectfully:

Pam

Pamela G. Hoskins, P.E., LSP
Technical Manager, Regulatory Specialist
Weston Solutions, Inc.
One Wall Street
Manchester, NH 03101-1501
603-425-1711, 603-437-9985 (fax)

John Ricker at Weston Solutions
(603) 656-5487

James Grifoni
First Lawrence Financial
(978) 682-0430

Pam

Pamela G. Hoskins, P.E., LSP
Technical Manager, Regulatory Specialist
Weston Solutions, Inc.
One Wall Street
Manchester, NH 03101-1501
603-425-1711, 603-437-9985 (fax)

Zupkus, John (DEP)

From: Fagan, Joanne (DEP)
Sent: Tuesday, August 01, 2006 9:10 AM
To: Zupkus, John (DEP); Thompson, Valerie (DEP)
Subject: RE: Tombarello Informations

ohn,

he plan for the heavy equipment decon and partial site use for the tractor trailer training has been delivered to you late last ee . Please review this plan and discuss with Val and Kim Tisa. The equipment decon is primarily governed by the TSCA regs., o although you should review the decon proposal, focus more of your attention to the site use portion.

Also, remind Jim Ricker that we still haven't received the Axiom asbestos survey report that they said they would forward to us.

From: Zupkus, John (DEP)
Sent: Thursday, July 27, 2006 10:45 AM
To: Fagan, Joanne (DEP); Thompson, Valerie (DEP)
Subject: FW: Tombarello Informations

I told Valerie but I forgot to tell you, Joanne, that Pam called on Tuesday and said we would receive a plan by the end of the week for removing the heavy equipment and preparing the paved area for the Andover tractor trailer training operation.

s you can see below, I used the conversation as an opportunity inquire about the schedule for repairing the various breaks in the eri eter fence and get some clarification about the compressed gas tanks.

---

rom: Hoskins, Pamela [mailto:Pam.Hoskins@westonsolutions.com]
ent: Thursday, July 27, 2006 8:38 AM
To: Zupkus, John (DEP)
Cc: james.grifoni@comcast.net; Ricker, Jim
Subject: Tombarello Informations

John:

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1) The fence repairs as discussed between you and Mr. Grifoni will be done next week. He spoke to his contractor on Monday nd it is all set.

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hope this answers you questions.

Respectfully:

To Ida on 9/28/06

From: Fagan, Joanne (DEP)
Sent: Wednesday, June 14, 2006 3:43 PM
To: Zupkus, John (DEP)

James Grifoni
First Lawrence Financial
733 Turnpike St., Suite 171
No. Andover, MA 01845

(978) 682-0430

Zupkus, John (DEP)

From: Macauley, John (DEP)
Sent: Friday, May 26, 2006 2:58 PM
To: Zupkus, John (DEP)
Subject: RE: Lawrence - 207 Marston St., Former Tombarellos, RTN 3-18126

John, sounds to me like they need at least a demolition renovation notification. I did not see one for the address on the system.

From: Zupkus, John (DEP)
Sent: Friday, May 26, 2006 1:41 PM
To: Macauley, John (DEP)
Subject: Lawrence - 207 Marston St., Former Tombarellos, RTN 3-18126

According to Jim Ricker of Weston Solutions, who works for First Lawrence Financial, LLC that holds the mortgage for the property, contractors working for the fiduciary have been working with solid waste on the property. They checked in with Kim Tisa to see if they could remove material that did not test positive for PCBs and she said yes. BWSC has a problem with this activity because no LSP supervision is taking place during this activity and soil contaminants could become airborne.

The thing I would like you to check is whether they are in compliance with your program. Mr. Ricker said that an asbestos survey was conducted by Axiom Partners(?) on February 2/3, 2006. Do they have the necessary approvals from your program to be removing portions of buildings and various piles of solid waste?

Donahue, Patricia (DEP)

From: Fagan, Joanne (DEP)
Sent: Monday, December 06, 2004 9:55 AM
To: Donahue, Patricia (DEP)
Subject: FW: FYI

fyi

From: Naparstek, Jay (DEP)
Sent: Monday, December 06, 2004 9:31 AM
To: Fagan, Joanne (DEP); Finneran, Catherine (DEP)
Subject: FYI

The Eagle Tribune

City seeks loan for former Tombarello site

By Ethan Forman, Staff Writer
December 2, 2004

LAWRENCE - The city has applied for a $1 million loan from the U.S. Environmental Protection Agency, with the aim that a portion of it might entice the owner of the former John C. Tombarello & Sons Salvage Co. site to clean up the property.

The nearly 15-acre, fenced-off former metal recycling facility at 207 Marston St. sits across the street from the city's Parthum School. It contains "hot spots" of polychlorinated biphenyls contamination, known as PCBs, according to the city's loan fund application to the EPA.

"We are just sort of looking around and saying, is there anything we can do to move this site along?" said Sharon DuBois, project manager for the Lawrence Office of Planning and Development.

The city should learn whether its application is successful by the spring. Dubois said it will be up to developers to come up with a plan to redevelop the site along Interstate 495.

The city has applied for a $1 million loan from the Brownfields Cleanup Revolving Loan Fund, a pool of money designed to assist in environmental cleanups of contaminated sites that have the potential for reuse.

DuBois said EPA rules allow for up to $200,000 be set aside for any one site.

The owner of the property is listed as American Recycling of Massachusetts, said Fred Carberry, the Office of Planning and Development's acting director, as did records with the Essex County Registry of Deeds Northern District.

American Recycling purchased the property in 1998. James Grifoni of Andover now holds the mortgage on the property, Carberry and DuBois said. Grifoni did not return two messages.

"The folks who own the Tombarello site have indicated they are interested in checking it out," DuBois said about the loan.

She said the city sent in the application in hopes Grifoni will take interest in redeveloping the Tombarello property, one of the last large tracts of land near the highway in the city.

Dubois said the city, with the loan, would be in a position to offer a low-interest or no-interest loan.
The site is opposite the Parthum School in the northeast part of the city, along a street that contains several businesses including a towing company and a metal recycling company. The site is just down the road from

Commonwealth Motors' dealerships and the reconstruction of the Marston Street interchange off I-495.

The 14.8-acre property is made up of two tracts of land, DuBois said. The northern half was used as a metal recycling plant dating back to the 1940s. John Tombarello, who operated the facility until 1998, died in February 2001 at the age of 81. Activities carried on there until 2001.

From the street at the front gate, it appears the site contains several buildings, including a one-story, red-brick building and a white shed next to it. A larger industrial building is visible in the distance.
The property is surrounded by a chain-link fence. Residents of a house located inside the front gate must use the property for access to Marston Street, DuBois said.

According to a 1998 mortgage on that property on file with the registry, Anthony Novello of 207 Marston St. has been granted for life a 20-foot easement allowing him and his invited guests to come and go as they please.

Just inside the gate stood a pile of white metal recyclable goods, including a refrigerator and washing machine. A sign on the red brick building warned against unauthorized dumping.

The southern half of the property was operated as a city landfill and was bought from Lawrence in 1967. It is considered by the state Department of Environmental Protection as a Tier 1C contaminated site.

Starting in 1998, samples of soil below the surface turned up elevated concentrations of PCBs, the city said in its application.

PCBs, used as lubricants in electrical transformers, are an oily mixture of hundreds of chemicals.
Those exposed to large doses of the chemicals can develop skin rashes and acne. Studies show PCBs can cause liver cancer in rats and are probably human carcinogens, according to the Agency for Toxic Substances and Disease Registry.

PCBs were probably released when transformers were received and taken apart at the site by the Tombarellos, DuBois said. About 400 soil samples have been collected at the site and most have concentrations less than 50 parts per million.

Dubois said there are some "hot spots" where concentrations run as high as 2,700 parts per million. "These areas will require the excavation and removal of contaminated soil prior to redevelopment of the site," DuBois wrote. More work will be needed to fulfill state and federal laws that govern cleanups.

The city has already tapped this EPA revolving loan fund for $1 million on two projects.

It has supplied $40,000 toward the redevelopment of the former St. Laurence O'Toole School as Lawrence CommunityWorks renovates the building at Newbury and East Haverhill into the Our House for Design and Technology training center.

The other $960,000 was earmarked for the quasi-public development finance agency MassDevelopment for its cleanup at the former Oxford Paper Co. site on Marston and Canal streets as part of the Lawrence Gateway project.

I have scheduled this meeting on behalf of First Lawrence Financial LLC, which holds the bank (and other) notes and mortgages for 207 Marston Street (the "Site"). At all relevant times, First Lawrence is acting and has acted exclusively as a 'secured lender' for the Site, and not as an 'owner or operator,' as those terms are defined and used under federal and state law. See, e.g., 42 U.S.C. sec. 9601(2)(A), (E) and Mass. Gen. L. c. 21E sec. 2(c)." - Regards, Edward W. Huminick , Representative, First Lawrence Financial.

MEETING DETAILS	
DATE:	**November 16, 2006**
TIME:	**9:30 AM**
PLACE:	**City Hall Lawrence, MA**
PROJECT:	**207 Marston Street**

ATTENDEES
E.W. Huminick - Representative, First Lawrence Financial
Jim Ricker - Weston Solutions
Kimberly Tisa - US EPA
Valerie Thompson - MADEP
Michael Sweeney - City of Lawrence
Caroline Ganley - City of Lawrence

AGENDA ITEMS	
Introduction of attendees	
Overview of current project status	
Comments and Concerns by City of Lawrence	
Comments and Concerns by US EPA	
Comments and Concerns by MA DEP	

FOLLOW UP		
ITEM	**RESPONSIBLE PARTY**	**DUE DATE**

MEETING NOTES

MEETING NOTES

SL Hampton

SCANNED

Massachusetts Department of Environmental Protection **BWSC-102B**
Bureau of Waste Site Cleanup

RELEASE LOG FORM ATTACHMENT

Release Tracking Number [redacted]

E. LOG/RELEASE LOCATION INFORMATION: (complete if using BWSC-102B only)

City/Town: [redacted] Date: 10/4/06 Time: ____ ☐ AM ☐ PM

Release Address: [redacted]reet

Use of Attachment (check one): ☐ Amendment to Release Log Form ☑ Attachment Page(s): 1 of: 1

F. INSPECTIONS OR SITE VISITS (also Follow-up Office Response): (check one)

☐ Initial Compliance Field Response - Announced ☐ Initial Compliance Field Response - Unannounced
☐ Compliance Field Response - Announced ☑ Compliance Field Response - Unannounced ☐ Field Audit Inspection
☐ Field Response - Direct Oversight ☐ Follow-up or Other Field Response ☐ Follow-up Office Response

G. ADDITIONAL DESCRIPTION: I performed an unannounced compliance inspection of the subject site. The front gate to the property was securely chained and locked. There was no activity occurring on the site. I observed one dump truck parked beside one of the vacant buildings. In addition a large excavator was parked in the central portion of the property. Both vehicles were idle, and there were no personnel on site. I checked to verify that the fence had been repaired adjacent to the billboard sign located in the southeastern rear of the property. The fence had been repaired with a 30' section of 4' high barbed wire fence.

I confirmed with Ms. Caroline Conley of Lawrence Inspectional Services Department that the tractor trailer training operations had stopped operating at this site as of Sept. 30, 2006.

H. DEP ASSIGNMENT: (complete if using BWSC-102A and 102B or BWSC-102B only)

Preparer of RLFA (please print): Valerie Thompson

Staff Lead Assigned (if different from preparer): ____

☐ Check here if the Release or Threat of Release is unassigned.

☑ Check here if this RLFA records a change in staff lead.

Subj: **Decon Pad Specification**
Date: 11/10/2006 9:42:20 AM Eastern Standard Time
From: jatwood@hazmatt.com
To: EdHuminick@aol.com

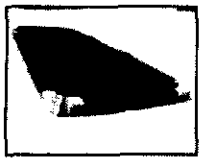
Ed,
Attached are the specifications and a image of the truck wash down pad discussed for the Lawrence project. We own a 14' x 54' x 1' Drive on Decon Berm with rubber tracks for drive on protection. We would also utilize wooden dunnage when deconing track mounted equipment. You may use this document as a submittal to the EPA for approval as an equal to Weston Solutions proposed decon pad; should they prefer the proposed setup I will provide a quotation as such. The rest of the decon specification will be met as proposed. Let me know if you need any additional information.

Regards,

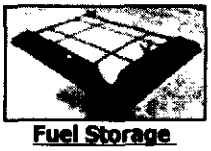
Jason Atwood
Project Manager
TMC Services, Inc.
Direct: (508) 966-6007
Main: (508) 966-3737
Nextel: (508) 680-2169
Fax: (508) 966-6207
mailto:jatwood@hazmatt.com

IPI
Interstate Products, Inc
"Quality Environmental Solutions"
1-800-474-7294

Related pages:



Other Products:



Fuel Storage Bladders

Click here to view XR-5® Chemical/Environmental Resistance Chart

XR 5

HIGH PERFORMANCE XR-5® 8130 REINFORCED GEOMEMBRANE

CHEMICAL / ENVIRONMENTAL RESISTANCE CHART

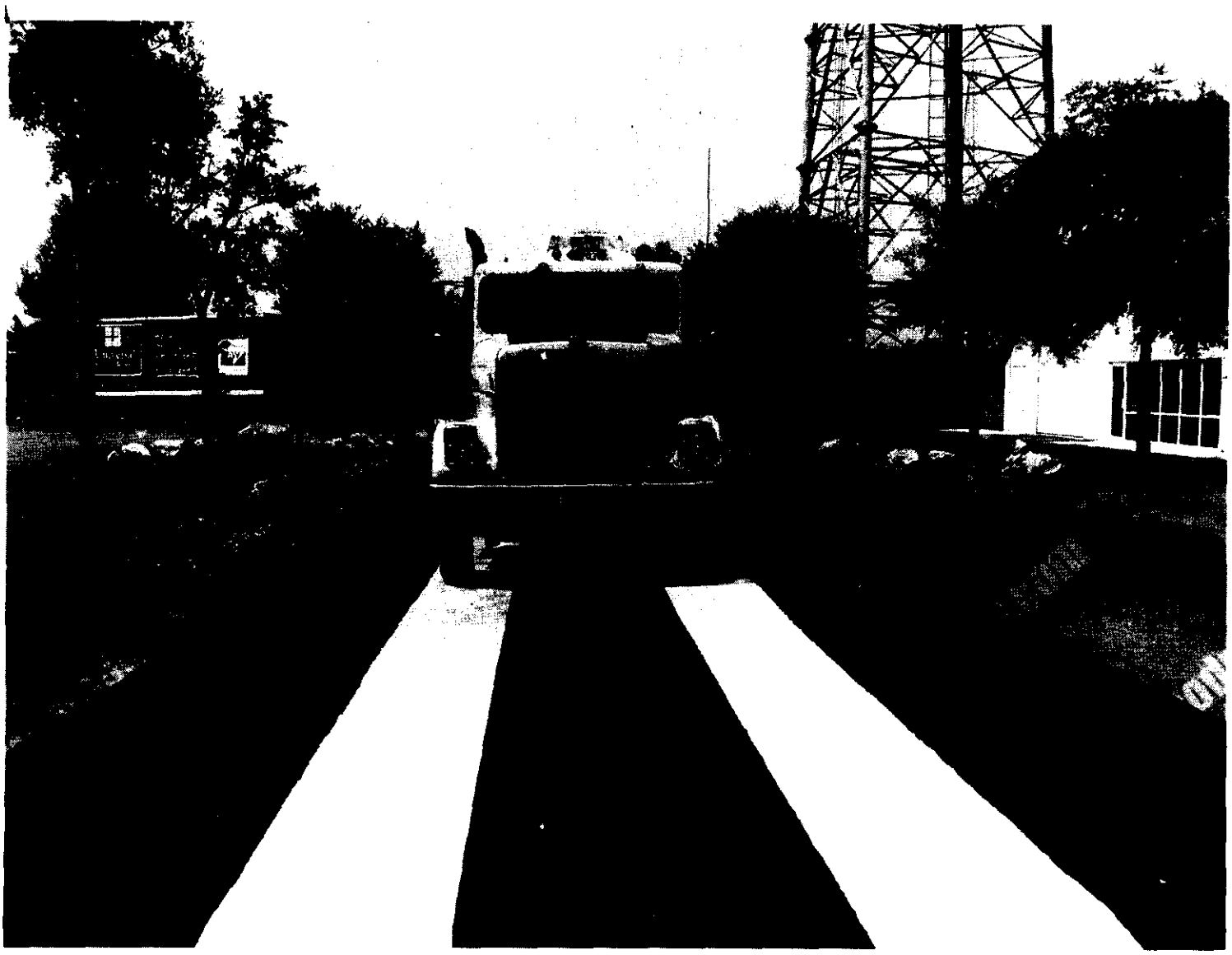
XR-5® 8130 Reinforced	Standard	Metric
Base Fabric Type ASTM D3776	Polyester	
Base Fabric Weight (nominal) ASTM D3776	6.5 oz/yd^2	220 g/m^2
Thickness ASTM D751	30.0 mils min.	0.76 mm min.
Weight ASTM D751	30.0 ± 2 oz/yd^2	1017 ± 70 g/m^2
Tear Strength ASTM D4533, Trapezoid Tear	35/35 lb$_f$ min.	155/155 N min.
Breaking Yield Strength ASTM D751, Grab Tensile	550/550 lb$_f$ min.	2447/2447 N min.
Low Temperature ASTM D2136, 4 hr - 1/8" mandrel	Pass @ -30 ° F	Pass @ -35 ° C
Dimensional Stability ASTM D1204, 212° F - 1 hr	1.5% max. each direction	
Adhesion - Heat Sealed Seam ASTM D751, Dielectric Weld	35 lb$_f$/2 in min.	15 daN/5 cm min.
Dead Load - Seam Shear Strength ASTM D751	2 in seam, 4 hr, 1 in strip 210 lb$_f$ @ 70° F 105 lb$_f$ @ 160° F	5 cm seam, 4 hr, 2.5 cm strip 934 N @ 21° C 467 N @ 70° C
Bursting Strength ASTM D751 Ball Tip	650 lb$_f$ min. 800 lb$_f$ typical	2892 N min. 3560 N typical
Hydrostatic Resistance ASTM D751, Method A	800 psi min.	5.51 MPa min.
Blocking Resistance ASTM D751 (180° F/82° C)	# 2 Rating max.	
Adhesion - Ply ASTM D413	15 lb$_f$/in min. or Film Tearing Bond	13 daN/5 cm min. or Film Tearing Bond
Bonded Seam Strength ASTM D751 as modified by NSF 54	550 lb$_f$ min.	2447 N min.
Abrasion Resistance ASTM D3389 (H-18 Wheel, 1000 g load)	2000 cycles (min.) before fabric exposure 50 mg/100 cycles max weight loss	
Weathering Resistance ASTM G23 (Carbon-Arc)	8,000 hrs (min.) - No appreciable changes or stiffening or cracking of coating	
Water Absorption ASTM D471, Section 12, 7 days	0.025 kg/m^2 max. @ 70° F/21° C 0.14 kg/m^2 max. @ 212° F/100° C	

Wicking Shelter-Rite® Procedure	1/8 in max.	0.3 cm max.
Puncture Resistance ASTM D4833	250 lb_f min.	1112 N min.
Coefficient of Thermal Expansion/ Contraction ASTM D696	8 x 10^{-6} in/in/°F max.	1.4 x 10^{-5} cm/cm/°C max.

We believe this information is the best currently available on the subject. We offer it as a suggestion in any appropriate experimentation you may care to undertake. It is subject to revision as additional knowledge and experience are gained. We make no guarantee of results and assume no obligation or liability whatsoever in connection with this information. In case of conflict between standard and metric specifications, standard shall apply.

XR 5

Spill Pallets **Spill Berm** Pillow Tanks **Drum Storage** Water Tanks Spill Containment



DEPARTMENT OF ENVIRONMENTAL PROTECTION
METROPOLITAN BOSTON-NORTHEAST REGIONAL OFFICE
205B LOWELL STREET, WILMINGTON, MA 01887

ATTENDANCE SHEET

MEETING PURPOSE: Tombarello's Junk Yard
DATE: 10/31/06 **CONFERENCE ROOM:** _____ **POINT OF CONTACT:** Valerie Thompson / Roxanne Fraser

	NAME	ORGANIZATION	ADDRESS	TELEPHONE NO.
1.	Valerie Thompson	MassDEP	205B Lowell St. Wilmington	978-694-3348
2.	Caroline Cawley	City of Lawrence	200 Common St. Rm 209 01840.	978-794-5950.
3.				
4.	Michael A. Sweeney	Planning Department	147 Haverhill St, Lawrence, MA 01840	978-794-5891 x16
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				

City Council
City of Lawrence

Councilors At Large

Nilka I. Alvarez-Rodriguez

Nunzio DiMarca

Joseph W. Parolisi

Patrick J. Blanchette - *District A*
Council President

Grisel Silva - *District B*

Jorge A. Gonzalez - *District C*

Nicholas J. Kolofoles - *District D*

Gilbert K. Frechette - *District E*
Vice President

Marie G. Gosselin - *District F*

SL: Thompson

October 18, 2006

Ms. Valerie Thompson
Executive Office of Environmental Affairs
Department of Environmental Protection
Northeast Regional Office
205B Lowell Street
Wilmington, MA 01887
RTN#3-18126

Dear Ms. Thompson:

I want to thank you for your most recent letter regarding 207 Marston Street in the City of Lawrence. Your office has been great to our City of Lawrence and your follow-up and leadership has been truly appreciated.

As you know I'm very interested in making sure that the proper procedures are followed on that site. As the City Councilor who represents that area of the city, I have great concern for the health and safety of the area in question. Your letter to Mr. Grifoni dated September 28, 2006 requested a "written plan within 15 days of receipt" outlining the actions he proposes to secure the site and eliminate future problems. At this time I'm requesting that you provide me with such plan that MR. Grifoni was required to submit. If he has not submitted such plan, then once again I would ask for your follow-up to ensure compliance with your order.

I thank you very much for your efforts and your attention to this matter.

Best Regards,

Patrick J. Blanchette
City Council President

RECEIVED
OCT 19 2006
DEP
NORTHEAST REGIONAL OFFICE

Cc: Mayor Michael J. Sullivan, Caroline Ganley, Kimberly Tisa, Joanne Fagan

200 Common Street • Tel: 978-794-5810 • Fax: 978-557-0285 • Lawrence, Massachusetts 01840

DAVIS MALM & D'AGOSTINE P.C.
ATTORNEYS AT LAW

Howard P. Speicher

October 5, 2006

SL=Wyman

CERTIFIED MAIL and First Class Mail
Joanne Fagan, Section Chief
Valerie A. Thompson, Environmental Analyst
Department of Environmental Protection
Northeast Regional Office
205B Lowell Street
Wilmington, MA 01887

Re: Former Tombarello & Sons property, **207 Marston Street, Lawrence,** Massachusetts; RTN **3-18126**

Dear Ms. Fagan and Ms. Thompson:

This office represents First Lawrence Financial LLC, ("First Lawrence") the holder of a mortgage on the above-referenced property. (the "Property") First Lawrence has asked us to respond to your letter dated September 28, 2006. First Lawrence is not a mortgagee-in-possession of the Property, but has taken certain steps to ensure that the owner of the Property complies with the requirements of the EPA and the Massachusetts DEP.

Accordingly, please be advised that as of no later than September 30, 2006, the tractor-trailer training facility that had been operating at the Property had ceased operations and is no longer present at the Property. There are no other occupants of the Property. Also as of no later than September 30, 2006, the fence and the gate at the Property had been repaired to eliminate any openings, and the gate had been padlocked, and remains padlocked.

As you know, working with Weston Solutions, First Lawrence is working to seek approval for a remediation plan for the Property. First Lawrence will not proceed with any such plan until it is properly authorized by the appropriate authorities.

direct 617-589-3829 *direct fax* 617-305-3129
email hspeicher@davismalm.com

ONE BOSTON PLACE • BOSTON • MA • 02108
617·367·2500 • *fax* 617·523·6215
www.davismalm.com

DAVIS MALM & D'AGOSTINE P.C.

We believe this should address the concerns raised in your letter of September 28th. If you have any continuing concerns or issues that need to be addressed, please contact me at your earliest convenience.

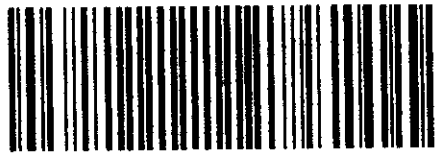
Very truly yours,

Howard P. Speicher

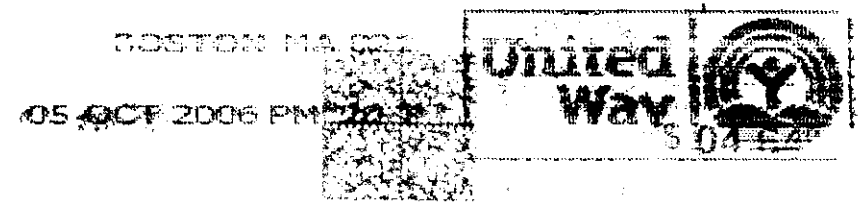
cc: James M. Grifoni
James Riker, P. G.

HPS/swb

419935v.1



7006 0100 0001 3011 6918



DAVIS MALM &
D'AGOSTINE P.C.
ATTORNEYS AT LAW

Joanne Fagan, Section Chief
Valerie A Thompson, Environmental Analyst
Department of Environmental Protection
Northeast Regional Office
205B Lowell Street
Wilmington MA 01887

File SB

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NORTHEAST REGIONAL OFFICE
205B Lowell Street, Wilmington, MA 01887 • (978) 694-3200

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

ROBERT W. GOLLEDGE, Jr.
Secretary

ARLEEN O'DONNELL
Commissioner

CERTIFIED MAIL
7003311000161077906

September 28, 2006

James Grifoni, President
First Lawrence Financial
733 Turnpike Street – Suite 171
North Andover, MA 01845

RE: Former Tombarello and Sons Property
207 Marston Street
RTN: 3-18126
Liability Exemption Status
M.G.L. c. 21E, 310 CMR 40.0000

Dear Mr. Grifoni:

On June 21, 2006, Massachusetts Department of Environmental Protection (MassDEP) personnel met with you and your consultant, Weston Solutions, on the subject site. At that time, you were instructed to cease all activities at the site that could create fugitive dust and potentially impact abutting residential properties and a nearby elementary school. In addition, you were instructed to repair all breaks in the existing perimeter fencing at the site and to keep the gate to the site closed at all times.

On July 5, 2006, MassDEP and the United States Environmental Protection Agency (EPA) met your consultant on the site. At that time, your consultant was again instructed that no activities were to be conducted at that site that could create fugitive dust. In addition, your consultant was told that no reclamation debris should leave the property without first being tested for PCB contamination and no reclamation related equipment/vehicles were to leave the property without being properly decontaminated.

On August 7, 2006, MassDEP received a letter report from Weston Solutions, on behalf of First Lawrence Financial, which proposed a plan for heavy equipment decontamination and a plan for sampling paved surface areas located in the front portion of the property. First Lawrence Financial is leasing out the front portion of the property for operational instruction of tractor-trailer trucks. During a July 11, 2006 conference call to you and your consultant, MassDEP and EPA required PCB sampling of the pavement in the front portion of the property prior to startup of the tractor-trailer operations to assess the extent of contamination in this area. As of September 22, 2006, the pavement in the front of the site had not been characterized for PCB contamination and tractor-trailers were observed operating in this area of the property. MassDEP has been notified by the City of Lawrence that you have been ordered by their Inspectional Services Department to cease and desist tractor-trailer operations at the site, however, you are reportedly appealing this order and are allowing the operations to continue.

As you are aware, the assessment and cleanup of this disposal site is governed by the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, M.G.L. c. 21E, which is implemented through regulations promulgated by MassDEP. These regulations are referred to as the Massachusetts Contingency Plan, (the MCP), 310 CMR 40.0000. The purpose of this letter is to ensure that you are aware of your responsibilities under M.G.L. c. 21E. MassDEP also wants to ensure that the assessment and cleanup of the site is conducted in accordance with the MCP.

According to information available to MassDEP, First Lawrence Financial holds the bank notes to the 207 Marston Street property and as such, is considered a secured lender under M.G.L. c. 21E. Section 2 of M.G.L. c. 21E states that a secured lender shall not be deemed an owner or operator of a site provided certain requirements are met, including no act of the secured lender, or of the secured lender's employees or agents, cause or contribute to a release or threat of release of oil or hazardous materials or cause the release or threat of release to become worse than it otherwise would have been. In order to maintain your liability exemption as a secured lender and **not** be deemed an "owner" or "operator" of the property and **not** be considered a Potentially Responsible Party (PRP) with liability for response action costs and damages under M.G.L. c. 21E, you must comply with all of the exemption requirements applicable to you as a secured lender and as outlined in the definition of "Owner" or "Operator" in M.G.L. c. 21E §2. By allowing unrestricted access to the site via an open, unlocked, and unsecured gate, by allowing the excavation and screening of contaminated soils resulting in the generation of fugitive dust, and by allowing debris and vehicles to exit the site without proper decontamination, you have acted in a manner that may have caused and may continue to cause the release of contamination at this site to become worse than it otherwise would have been. Be aware, continuation of these actions will cause you to lose your liability exemption.

MassDEP is requesting that you provide us with a written plan within 15 days of receipt of this letter outlining the actions you propose to take to secure the site and eliminate activities that have the potential to exacerbate site conditions and impact site occupants and off-site receptors.

If you have any questions relative to this letter, you should contact Valerie Thompson at the letterhead address or (978) 694-3348. All future communications regarding this release must reference the Release Tracking Number (RTN # 3-18126) contained in the subject block of this letter.

Very truly yours,

Valerie A. Thompson
Environmental Analyst

Joanne Fagan
Section Chief
Brownfields/Permits

E-cc: City of Lawrence, Mayor Michael J. Sullivan, msullivan@cityoflawrence.com
City of Lawrence , Patrick J. Blanchette, City Council President,
pblanchette@cityoflawrence.com
City of Lawrence, Caroline Ganley, Inspectional Services Department,
cganley@cityoflawrence.com
US EPA, Kimberly Tisa, tisa.kimberly@epa.gov
US EPA, Marianne Milette, milette.marianne@epa.gov
Weston Solutions, James Ricker, James.Ricker@westonsolutions.com

From: Fagan, Joanne (DEP)
Sent: Wednesday, June 14, 2006 3:43 PM
To: Zupkus, John (DEP)

James Grifoni
First Lawrence Financial
733 Turnpike St., Suite 171
No. Andover, MA 01845

(978) 682-0430

City Council
City of Lawrence

Councilors At Large
Nilka I. Alvarez-Rodriguez
Nunzio DiMarca
Joseph W. Parisi

Patrick J. Blanchette
Grisel Silva
Jorge A. Gonzalez
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Marie G. Gosselin

MassDEP Northeast Region
205B Lowell Street
Wilmington, MA 01887
Attention: Ms. Joanne Fagan

RECEIVED

2006

September 20, 2006

RE: 207 Marston Street/city of Lawrence

Dear Ms. Fagan,

I write this letter seeking assistance with a severe health problem facing the city of Lawrence. The property at 207 Marston Street, as you are aware, is extremely hazardous to the residents of my city. I call upon your agency to please use any and all means allowed under law to close this site down and remove any individuals from the location not legally allowed to be there. Due to the presence of "PCB's" both the DEP and EPA have joint regulatory authority over this site.

In June and July 2006, your agency verbally informed Mr. Grifoni, owner of the "note" for said property that he needed to halt all activities until he received written permission to conduct such activities. As of this date, I don't believe such permission has been granted. However, I do know that Mr. Grifoni continues to conduct business on this property in direct violation to the city, and state code. I hope that your agency will not allow such disregard of the law to continue.

Mr. Grifoni pays no taxes (which are in excess of $200,000) to the city, but yet endangers the citizenry of our city by his actions. Mr. Grifoni has and continues to remove all kinds of contaminated debris from the property and I question it's final destination.

As of this date our Inspectional Services Department has ordered a cease and desist on the property, but once again, Mr. Grifoni does not comply with such order. Currently the site is being used as a training ground for a Tractor Trailer School. On any given day trucks are entering the contaminated site and exiting on to a public roadway, which causes a great public alarm. The site as you know is directly across from an elementary school and I fear for the children's health and safety at this point in time.

As the District City Councilor, I have been dealing with this site for quite some time and I really need your immediate attention to this property. I believe the city has exhausted its resources, and it's now time for the state to put a clamp on this hazard. I hope that your office will look into this matter and take the necessary enforcement steps to stop Mr. Grifoni's bold and tenacious actions. I believe Mr. Grifoni should be named as a responsible party and be forced to clean up "his mess" and be fined accordingly.

I thank you for your time and attention to this important matter. Should you have any questions for me please don't hesitate to call upon me via cell phone @ (978) 265-9001.

Sincerely,

Patrick J Blanchette
City Council President

CC: Mayor Michael J Sullivan, Caroline Ganley, Luis Waldron, Kimberly Tisa, Ezra Glenn, Michael Sweeney, Gregory Arvanitis

Lawrence
Marston ST
3-10206

N/A-C

City of Lawrence
Inspectional Services Department

Caroline M. Ganley
Commissioner

Board of Health
Building
Code Enforcement
Public Health
Plumbing and Gas
Weights and Measures

200 Common St.
Lawrence, MA 01840
Tel: 978-794-5950
Fax: 978-794-1251

RECEIVED
AUG 31 2006
DEP
NORTHEAST REGIONAL OFFICE

To: Greg Arvanitis, Building Inspector
Joanne Fagan, Brownfields Section Chief Mass DEP
Ezra Glenn, Community Development Director
Kimberly Tisa, PCB Coordinator, US EPA Boston
Tom Schiavonne, Economic Development Director
Mike Sweeney, Planning Director
Luis Waldron, Building Commissioner

Fr: Caroline Ganley, ISD Commissioner

Date: August 30, 2006

Re: Tombarello's Site – Marston Street

Today, a meeting was held between the City, Mass DEP and US EPA to discuss the above site.

Problems:

1. Public Health and Environmental Concerns raised by site activity .
2. Mr. Graffoni (note holder) has asked DEP for permission to operate a truck driver training operation. The trucks have been on site for several weeks now (in spite of having obtained no permits) and neighbors are complaining.

Discussion:

1. **Site was abandoned** by previous owner (Peter Prinz of American Recycling). Mortgage foreclosed. Mr. Jim Graffoni holds the note.
2. **Mass Development gave Graffoni a grant** to pay for site testing and a site assessment to see what needs to be cleaned up and how much it will cost. Graffoni has told EPA and DEP that he will not be cleaning the site until he has a buyer.
3. **Site assessment is in draft form and has not been accepted by either DEP or EPA.** EPA is involved due to the presence of PCBs. Therefore, DEP and EPA have joint regulatory authority.
4. **City has been responding to citizen complaints on this site for several years.** Recently, the complaints included dusty conditions and the city called DEP. DEP and EPA responded by conducting several site visits which included meeting with Mr. Graffoni on site. In June and July 2006 Graffoni was verbally told by DEP and EPA to halt all activities and that he needed written permission by DEP/EPA to conduct any activities.

5. **Due to extent and type of contamination, EPA cannot allow the capping of soil (ie asphalt) just for a temprorary use.** The site must be assessed and clean-up must take place before use.

6. **City Permits.** The site is industrial, so the proposed use would be allowed. However, a business cert cannot be issued unless the business has a building with a bathroom: therefore construction would be required and the BOH cannot sign off until there is an approval from DEP and EPA. Furthermore, no monies can be owed (ie taxes, water, etc.) and research shows there are outstanding taxes on this site of approx $200,000.00

Next Steps:

ISD to issue violation letter ordering removal of trucks, halting all activities on site unless owner obtains written permission from DEP and EPA, and the securing of the fence to prevent any access to the site.

Where is the Owner? Mass DEP and the EPA will be asking their attorney's how to pursue the owner (American Recycling) who is reported to be living in Kentucky. It was also mentioned that American Recycling may still own the property leased by Waste Management next door.

The City (Ezra and Mike) will consider whether it makes sense to seek ownership of the property.

The City (Ezra) will look into the new Brownfields Grant. DEP says it is due soon

Cc: Mayor Michael J. Sullivan, Chief of Staff Myles Burke, Lawrence BOH.

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

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Lieutenant Governor

STEPHEN R. PRITCHARD
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

MEMORANDUM

To: File
Through: Joanne Fagan, Section Chief-CAP/BWSC/NERO
From: John Zupkus, Environmental Analyst/BWSC/NERO
Subject: Former Tombarellos, 207 Marston St., Lawrence, RTN 3-18126
Summary of four site visits from June through August, 2006

Date: August 15, 2006

SITE VISIT ON JUNE 2, 2006

A site visit was conducted on 6/2/06 to determine if activities are taking place that should be regulated by MassDEP and whether adequate site fencing is abating a potential Imminent Hazard. When I arrived, the main gate was open and unattended. I could see a few trucks on the property and hear heavy machinery in the distance. The Parthum School at 255 East Haverhill Street is across the street from the site to the west. About twelve houses on Hoffman Street directly abut the site to the north. A stockade fence separates most of these houses from the site. Children's play sets, above-ground pools, and at least one vegetable garden could observed in the back yards of these homes. The stockade fence was smashed by tree branches at one location, permitting access to the site. While taking photographs, a Hoffman Street resident and former Tombarellos worker introduced himself. He has been upset with the activities of American Recycling and with the current mortgage holder, Mr. Grifoni of First Lawrence Financial, LLC, and was willing to provide me with information. The man is Al Beaulieu at 51 Hoffman Street. He stated that Mr. Tombarello put up the stockade fence in the mid-1960s. However, surveyors just drove stakes and they were about ten feet north of the fence. Therefore, the back ten feet of these residential properties was once part of the Tombarellos salvage yard.

Mr. Beaulieu was also concerned that buildings were demolished six to eight months ago without a permit and they are using a gravel screener on a contaminated site without permission. He believes they are excavating berm material, screening it and/or spreading it out and passing a boomed magnet over the soil to harvest ferrous metal for salvage. After the metal is removed, the soil is transported to another portion of the site. People were previously cutting up large steel pieces but there is no large steel left. Mr. Beaulieu believes the Tombarellos site was a

Lawrence Municipal dump before salvage operation began in the 1940s. He also stated that Mr. Grifoni has been telling people that he owns the property.

I looked at the baseball field and the Sons of Italy property to the south. Mr. Beaulieu said that Mr. Tombarello previously owned both parcels and donated the land. Except for a small section at the front of the Sons of Italy property there is an approximately 20 foot high berm separating Waste Management and Tombarellos from the adjoining parcels to the south. There is a small barbwire or small metal fence at the top of the berm except where a large billboard is mounted in the berm near I-495. About 100 yards behind the baseball field is a wetland about 15 feet below the surrounding fill.

There is a similar berm adjacent to I-495. The small fence on top of the berm appears discontinuous.

From surface topography, it appears that regional groundwater would flow south or southeast. However, there is a low spot in the middle of Hoffman Street and the site could locally be affecting these homes.

SITE VISIT ON JUNE 21, 2006

A site visit was conducted on 6/21/06 as a follow-up to the perimeter walk performed on 6/2/06. During the perimeter walk to investigate the source of noise and possible unauthorized activities, BWSC determined that the site may present an Imminent Hazard to residents, a school and recreation field adjacent to the site due to PCBs and Cadmium in surface soils and inadequate site security.

Attendees at the current site visit were Valerie Thompson and myself from BWSC/NERO, James Grifoni of First Lawrence Financial, LLC and James Ricker and Pamela Hoskins of Weston Solutions, Inc (Weston). During the current site visit, BWSC explained the need to secure the site from possible trespassers and that soil disturbance activities appeared to be exacerbating on-site conditions, and potentially increasing potential dust exposure to nearby receptors. Mr. Grifoni was instructed to cease these activities until further notice. BWSC indicated that it would determine if enforcement for these activities is warranted and what Mr. Grifoni would need to do to continue salvage operations in accordance with the Massachusetts Contingency Plan. MassDEP stated that Kim Tisa at EPA's TSCA program would be informed of these activities.

SITE VISIT ON JULY 5, 2006

EPA conducted a joint site inspection with BWSC to coordinate our responses to past activities and provide an outline for various proposals for additional metal reclamation or temporary use of the front portion of the property.

Former Tombarellos RTN 3-18126 Memo to file
Subject: Summary of June and July 2006 site visits

Attendees at the current site visit were Kim Tisa from EPA's TCSA program, Joanne Fagan and myself from BWSC/NERO, and James Ricker of Weston. James Grifoni, the secured lender for the site, could not attend.

During this inspection, unsecured and pressurized oxygen tanks, a pile of tires, and drums and containers were observed throughout the property. The furnace building, metal shop/garage, office, and home are the significant aboveground structures remaining on the site. Two shear buildings and a bailer/press building had been present toward the center of the site. It is unknown whether the appropriate permits were obtained prior to demolition.

Most of the soil disturbance seems to have taken place at the rear of the property (eastern end). Piles of soil embedded with metallic and non-metallic debris were located in this area. Another pile of soil was present at the foot of the eastern berm a short distance away that had the appearance of screened loam. MassDEP had been previously been told by Mr. Grifoni in June that the soil debris piles look like loam after the metal scavengers have processed them. A gravel grader and crane with a magnet were located in this area. The bulldozer and payloader that had been observed in this area on previous site visits were not in this back portion of the property. The payloader was observed near the front of the site. The metal reclaimers were passing soil through the grader and spreading it on the ground to reclaim the metal. Ms. Tisa expressed concern that reclaimed metal from this operation had come in contact with PCB contaminated soil and may be leaving the property with contamination on it. She also remembered saying that large pieces of metal that had been tested and found to have minimal or no PCBs could be removed because they were not subject to TSCA regulations. No one indicated to Ms. Tisa that contaminated soil would be disturbed. Ms. Fagan expressed concern about increased exposure to abutting school children, residents, or people using the athletic field from increased site dust created by the movement of soil. It was observed that the working part of the site was very close to the stockade fence of the residences.

On the way back to the front of the property a storm drain grate was observed. Mr. Ricker indicated that this eventually discharges to Merrimack River. MassDEP requested that hay bails or something equivalent be placed around the grate to prevent additional site soil from being discharged to the Merrimack River.

At the end of the site visit, EPA and MassDEP stated that continuation of metal reclamation from soil piles could no longer take place without a plan for testing and/or decontamination that was approved by both agencies. We asked Mr. Ricker how Mr. Grifoni wanted to proceed. Mr. Ricker stated that Mr. Grifoni had received a new proposal to use the front of the parcel for truck driver training but had also expressed an interest in finishing the reclamation activity. Mr. Ricker stated that he would discuss the issues raised and submit a plan in the near future.

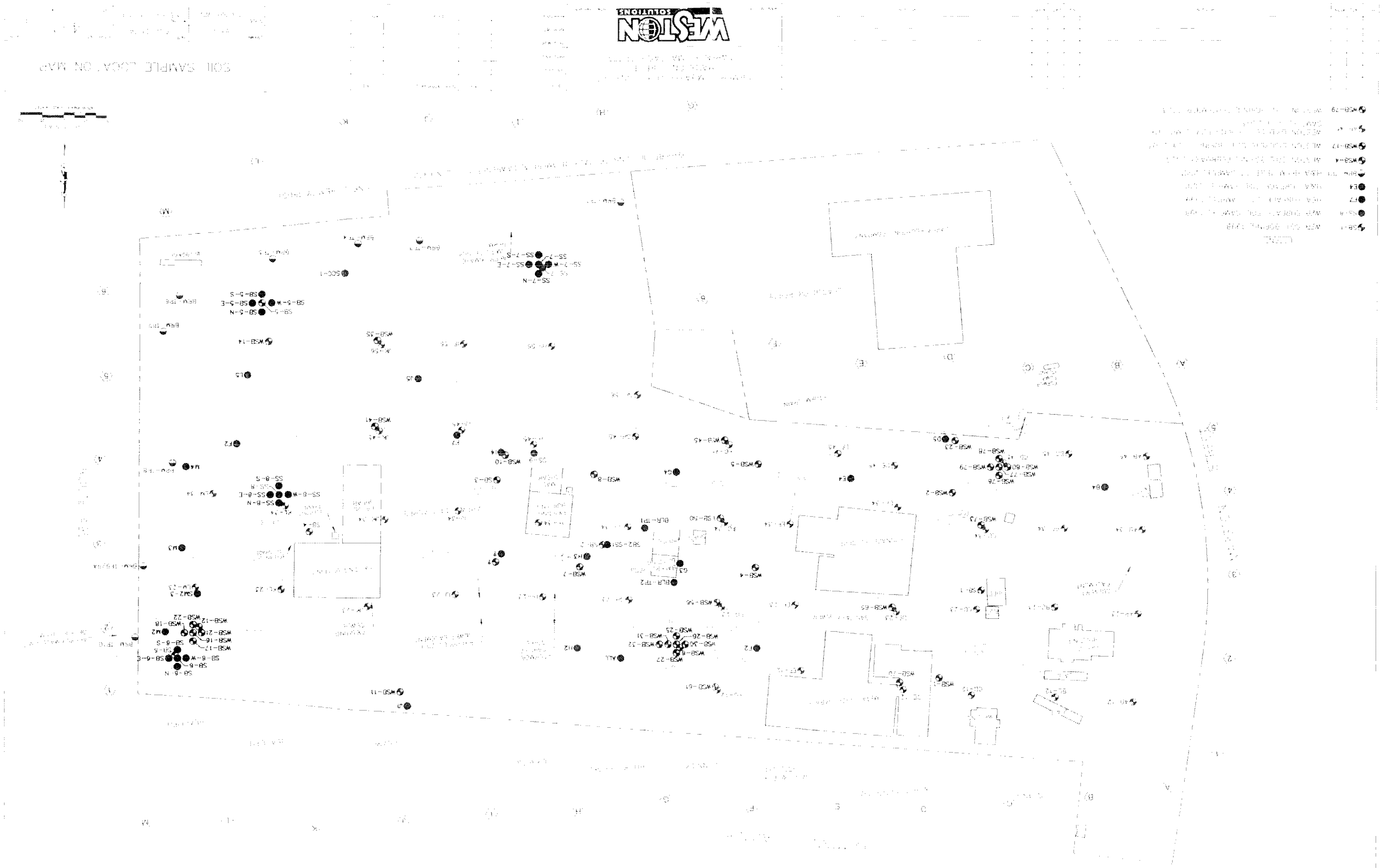
A site visit was conducted on 7/5/06 as a follow-up to the site visit performed on 6/21/06. Following the previous site visit with James Grifoni and representatives of Weston Solutions, Inc (Weston), Kim Tisa was informed of site conditions and the activities that had taken place. She requested that MassDEP, Mr. Grifoni, and representatives of Weston meet her at the site so she could determine EPA's course of action.

Attendees at the current site visit were Joanne Fagan and myself from BWSC/NERO, and James Ricker of Weston.

BWSC Brownfields staff conducted a joint site inspection with Kim Tisa of EPA's TSCA program on July 5th. In May and June, the mortgage holder – Mr. James Grifoni of First Lawrence Financial, hired contractors to scavenge scrap metal from soil piles located throughout the property. BWSC ordered these activities to cease during an inspection on June 21st, as they likely generated PCB and lead contaminated dust without dust suppression and decontamination measures in place. Receptors abutting the property include residences, a K-8 school, and a recreation ball field. During this inspection, unsecured and pressurized oxygen tanks, large tire piles, and drums and containers were observed throughout the property.

On July 11th, a conference call was arranged among the participants of the July 5th site visit and Mr. Grifoni as well as an LSP and PCB expert from his consulting group. Mr. Grifoni discussed his desire to remove various items to make the property more attractive to various buyers or tenants. The agency representatives outlined the requirements for restarting the activity that was stopped as well as for a limited use of the front portion of the property.

Mr. Grifoni stated that he would repair all breaks in site fencing to abate the potential Imminent Hazard. BWSC will conduct a follow-up inspection to confirm that the breaks have been repaired.


SOIL SAMPLE LOCATION MAP
WESTON SOLUTIONS

INTERSTATE 495
INTERSTATE 495
STEINER STREET
HOFMANN AVENUE
LAWRENCE
NORRIS STREET
MARSTON STREET
JOSEPHINE AVENUE
HENRY AVENUE
CASTRAVERHILL STREET
0
80
160
320
480
640
Feet

SCANNED

Zupkus, John (DEP)

From: Ricker, Jim [James.Ricker@WestonSolutions.com]
Sent: Tuesday, August 29, 2006 10:26 AM
To: Zupkus, John (DEP)
Subject: Asbestos Survey Report, Tombarello

Attachments: Scan001.PDF

Scan001.PDF (2 MB)

As we discussed, the asbestos report is attached.

Jim

PARTNERS
axiom
environmental engineers

MAIN OFFICE:

979 Main Street
Wakefield, Massachusetts 01880
(781) 213-9198
(781) 213-6992 Fax

BRANCH OFFICES:

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Plymouth, Massachusetts 02360
(508) 746-5218
(508) 732-0281 Fax

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Derry, New Hampshire 03038
(603) 434-5245
(603) 434-5172 Fax

www.axiomenv.com

March 27, 2006

Weston Solutions
One Wall Street
Manchester, NH 03101

Attn: Jim Ricker

Dear Mr. Ricker,

Jim Grifoni asked me to send you a copy of this report. If you have any question please do not hesitate to call me at 781.213.9198 or e-mail me at shurley@axiomenv.com.

Sincerely,

Sean P. Hurley
Axiom Partners, Inc.

enclosure

MAIN OFFICE:

979 Main Street
Wakefield, Massachusetts 01880
(781) 213-9198
(781) 213-6992 Fax

BRANCH OFFICES:

4 Pequot Terrace
Plymouth, Massachusetts 02360
(508) 746-5218
(508) 732-0281 Fax

10 Diamond Drive
Derry, New Hampshire 03038
(603) 434-5245
(603) 434-5172 Fax

www.axiomenv.com

February 7, 2006

Mr. James Grifoni
Rolling Meadows Farms, Inc
First Lawrence Trust Fund
733 Turnpike Street Suite 171
North Andover, MA, 01845

Project #1131.378

RE: Asbestos Survey for 207 Marston Street, Lawrence, MA

Dear Mr. Grifoni:

At your request, Axiom Partners, Inc. (AXIOM) performed limited testing of certain building materials for asbestos at the above-referenced location. The sampling was performed on January 26, 2006 by Massachusetts-licensed Asbestos Inspectors, Sean Hurley, Matthew Buccella and Trevor Herron in preparation for demolition activities at the property.

The bulk sampling was performed following AHERA[1] protocols. Bulk samples were delivered to AmeriSci, located in Weymouth, Massachusetts for analysis. AmeriSci is fully accredited for asbestos bulk sample analysis under the National Voluntary Laboratory Accreditation Program (NVLAP) administered by the National Institute of Standards and Technology (NIST). AmeriSci is also licensed by the Commonwealth of Massachusetts. Bulk samples were analyzed for asbestos content using EPA Method 600/M4-82-920. Chain-of-custody forms were used to ensure sample integrity. The following materials were found to contain >1% asbestos content, and therefore must be handled as asbestos containing material (ACM):

Material	Location	Estimated Quantity
Green/Brown Sheet Flooring	Building 1; Hallway, Conference Room, and Office Adjacent Conference Room	500 sq. ft.
Sheet Flooring	Building 1; Office Adjacent Conference Room (under carpet and green/brown sheet flooring)	150 sq. ft.
Window Caulk	Building 1; Exterior of Windows	10 Windows
Black Flashing Sealant	Building 1; Roof	250 Linear Feet
Black Flashing Sealant	Buildings 7 and 8; Roof	350 Linear Feet
Built Up Roof	Buildings 7 and 8; Roof	10,000 sq. ft.

(1) Asbestos Hazard Emergency Response Act (EPA, 1986)

Material	Location	Estimated Quantity
Gray Window Glazing	Building 8; Interior of Windows	9 Windows
Black Flashing Sealant	Building 4; Roof	200 Linear Feet
White Expansion Joint	Between Buildings 7 and 8	40 Linear Feet
Gray Window Glazing	Building 3	6 Windows
Gray Window Glazing	Building 6	13 Windows
Gray 12" X 12" Floor Tile	Building 5; Elevated Floor	400 sq. ft.
Paper Backing/Mastic	Building 5; Elevated Floor; Under Gray 12" X 12" Floor Tile	400 sq. ft.
Tan Window Glazing	Building 5	4 Windows
Brown Glue	Shed; Under Wood Panels on Interior Walls	Throughout
Brown Sheet Flooring	Building 2; First Floor Kitchen	400 sq. ft.
Off White Sheet Flooring	Building 2; First Floor Kitchen; Under Brown Sheet Flooring	400 sq. ft.
Tan Sheet Flooring	Building 2; First Floor Bedroom Off Kitchen	130 sq. ft.

ACMs that will be impacted by demolition activities must be removed by a Massachusetts-licensed Asbestos Contractor. Removal must be performed in compliance with governing regulations.

Please call us if your have any questions or require additional assistance.

Sincerely,

Trevor Herron
Assistant Asbestos Inspector

Sean P. Hurley
Project Manager/Principal

Attachment: AmeriSci Asbestos Bulk Sample Analysis Report

axiom PARTNERS

AMERI SCI

AmeriSci Boston
8 SCHOOL STREET
WEYMOUTH, MA 02189
TEL: (781) 337-9334 • FAX: (781) 337-7642

February 6, 2006

Axiom Partners, Inc.
Attn: Sean Hurley
979 Main Street
Wakefield, MA 01880

RE: Axiom Partners, Inc.
Job Number 506021003
P.O. # 1131.378
1131.378; 207 Marston St.; Lawrence, MA

Dear Sean Hurley:

Enclosed are the results for PLM asbestos analysis of the following Axiom Partners, Inc. samples received at AmeriSci on Wednesday, February 01, 2006, for a 5 day turnaround:

Sample ID 012606-06-01A through 012606-04-18B

The 101 samples contained in plastic sample bags were shipped to AmeriSci via Federal Express. These samples were prepared and analyzed according to the EPA Interim Method (EPA 600/M4-82-020 per 40 CFR 763, subpt F, App. A). The required analytical information, analysis results, analyst signature and laboratory identification is contained in the Analyst's Report.

This report relates ONLY to the sample analysis expressed as percent asbestos. AmeriSci assumes no responsibility for customer supplied data such as "sample type", "location", or "area sampled". This report must not be used to claim product endorsement by AmeriSci, NVLAP or any agency of the U. S. Government. The National Institute of Standards and Technology Accreditation requirements, mandates that this report must not be reproduced, except in full without the written approval of the laboratory. This report may contain specific data not covered by NVLAP or ELAP accreditations respectively, if so identified in relevant footnotes.

AmeriSci appreciates this opportunity to serve your organization. Please contact us for any further assistance or with any questions.

Sincerely,

Bryan H. Clark
Asbestos Lab Director

AMERISCI

AmeriSci Boston
8 SCHOOL STREET
WEYMOUTH, MA 02189
TEL: (781) 337-9334 • FAX: (781) 337-7642

PLM Bulk Asbestos Report

Axiom Partners, Inc.
Attn: Sean Hurley
979 Main Street
Wakefield, MA 01880

Date Received 02/01/06 **AmeriSci Job No.**506021003
Date Examined 02/06/06 **P.O. #** 1131.378
Page 1 **of** 22
RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-01A	506021003-01	*No*	NAD
1	**Location:** Building 1, Behind Wood Panels In Perimeter Of Building		
	Description: Brown/Black, Homogeneous, Fibrous, Insulation		
	Asbestos Types:		
	Other Material: Cellulose 85. %, Non-fibrous 15. %		
012606-06-01B	506021003-02	*No*	NAD
1	**Location:** Building 1, Behind Wood Panels In Perimeter Of Building		
	Description: Black, Homogeneous, Fibrous, Insulation		
	Asbestos Types:		
	Other Material: Cellulose 85. %, Non-fibrous 15. %		
012606-06-02A	506021003-03	*No*	NAD
2	**Location:** Building 1, Throughout		
	Description: Tan, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Cellulose 20. %, Fibrous glass 5. %, Synthetic fibers 5. %, Non-fibrous 70. %		
012606-06-02B	506021003-04	*No*	NAD
2	**Location:** Building 1, Throughout		
	Description: Tan, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Cellulose 20. %, Fibrous glass 5. %, Synthetic fibers 5. %, Non-fibrous 70. %		
012606-06-03A	506021003-05	*Yes*	20 %
3	**Location:** Building 1, Hallway, Conference Room, And Office		
	Description: Brown, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types: Chrysotile 20. %		
	Other Material: Cellulose 10. %, Non-fibrous 70. %		

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Date Received 02/01/06 AmeriSci Job No.506021003
Date Examined 02/06/06 **P.O. #** 1131.378

RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-03B	506021003-06		NA/PS
3	**Location:** Building 1, Hallway, Conference Room, And Office		
	Description: Sheet Flooring		
	Asbestos Types:		
	Other Material:		
012606-06-04A	506021003-07	*Yes*	20 %
4	**Location:** Building 1, Under Carpet In The Office Adjacent Conference Room		
	Description: Brown, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types: Chrysotile 20. %		
	Other Material: Cellulose 10. %, Non-fibrous 70. %		
012606-06-04B	506021003-08		NA/PS
4	**Location:** Building 1, Under Carpet In The Office Adjacent Conference Room		
	Description: Sheet Flooring		
	Asbestos Types:		
	Other Material:		
012606-06-05A	506021003-09	*No*	NAD
5	**Location:** Building 1, Central Portion		
	Description: Brown/Off-White, Homogeneous, Fibrous, 1'x1' Ceiling Tile		
	Asbestos Types:		
	Other Material: Cellulose 90. %, Non-fibrous 10. %		
012606-06-05B	506021003-10	*No*	NAD
5	**Location:** Building 1, Central Portion		
	Description: Brown/Off-White, Homogeneous, Fibrous, 1'x1' Ceiling Tile		
	Asbestos Types:		
	Other Material: Cellulose 90. %, Non-fibrous 10. %		

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Date Examined 02/06/06

AmeriSci Job No.506021003
P.O. # 1131.378

RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-06A	506021003-11	*No*	NAD
6	**Location:** Building 1, Throughout		
	Description: Black, Homogeneous, Non-Fibrous, Covebase		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-06B	506021003-12	*No*	NAD
6	**Location:** Building 1, Throughout		
	Description: Black, Homogeneous, Non-Fibrous, Covebase		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-07A	506021003-13	*No*	NAD
7	**Location:** Building 1, Throughout		
	Description: Brown, Homogeneous, Non-Fibrous, Covebase Mastic		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-07B	506021003-14	*No*	NAD
7	**Location:** Building 1, Throughout		
	Description: Brown, Homogeneous, Non-Fibrous, Covebase Mastic		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-08A	506021003-15	*No*	NAD
8	**Location:** Building 1, Conference Room		
	Description: Brown/Off-White, Homogeneous, Fibrous, 2'x4' Ceiling Tile		
	Asbestos Types:		
	Other Material: Cellulose 45. %, Fibrous glass 35. %, Non-fibrous 20. %		

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Date Received 02/01/06 AmeriSci Job No.506021003
Date Examined 02/06/06 **P.O. #** 1131.378

RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-08B	506021003-16	*No*	NAD
8	**Location:** Building 1, Conference Room		
	Description: Brown/Off-White, Homogeneous, Fibrous, 2'x4' Ceiling Tile		
	Asbestos Types:		
	Other Material: Cellulose 35. %, Fibrous glass 35. %, Non-fibrous 30. %		
012606-06-09A	506021003-17	*No*	NAD
9	**Location:** Building 1, Offices		
	Description: Brown/Off-White, Homogeneous, Fibrous, 2'x2' Ceiling Tile		
	Asbestos Types:		
	Other Material: Cellulose 35. %, Fibrous glass 35. %, Non-fibrous 30. %		
012606-06-09B	506021003-18	*No*	NAD
9	**Location:** Building 1, Offices		
	Description: Brown/Off-White, Homogeneous, Fibrous, 2'x2' Ceiling Tile		
	Asbestos Types:		
	Other Material: Cellulose 35. %, Fibrous glass 35. %, Non-fibrous 30. %		
012606-06-10A	506021003-19	*No*	NAD
10	**Location:** Building 1, Above Ceiling Throughout		
	Description: Brown, Homogeneous, Fibrous, Insulation Paper		
	Asbestos Types:		
	Other Material: Cellulose 70. %, Fibrous glass 10. %, Non-fibrous 20. %		
012606-06-10B	506021003-20	*No*	NAD
10	**Location:** Building 1, Above Ceiling Throughout		
	Description: Brown, Homogeneous, Fibrous, Insulation Paper		
	Asbestos Types:		
	Other Material: Cellulose 70. %, Fibrous glass 10. %, Non-fibrous 20. %		

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Date Received 02/01/06
Date Examined 02/06/06

AmeriSci Job No.506021003
P.O. # 1131.378

RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-11A	506021003-21	*No*	NAD
11	**Location:** Building 1, South Stairs		
	Description: Off-White, Homogeneous, Non-Fibrous, 12"x12" Tile		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-11B	506021003-22	*No*	NAD
11	**Location:** Building 1, South Stairs		
	Description: Off-White, Homogeneous, Non-Fibrous, 12"x12" Tile		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-12A	506021003-23	*Yes*	2 %
12	**Location:** Building 1, Throughout		
	Description: Grey, Homogeneous, Fibrous, Window Caulk		
	Asbestos Types: Chrysotile 2. %		
	Other Material: Non-fibrous 98. %		
012606-06-12B	506021003-24		NA/PS
12	**Location:** Building 1, Throughout		
	Description: Window Caulk		
	Asbestos Types:		
	Other Material:		
012606-06-13A	506021003-25	*No*	NAD
13	**Location:** Building 1, Roof		
	Description: Black, Heterogeneous, Fibrous, Roof		
	Asbestos Types:		
	Other Material: Cellulose 45. %, Synthetic fibers 5. %, Non-fibrous 50. %		

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Date Examined 02/06/06 **P.O. #** 1131.378
Page 6 **of** 22
RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-13B	506021003-26	*No*	NAD
13	**Location:** Building 1, Roof		
	Description: Black, Heterogeneous, Fibrous, Roof		
	Asbestos Types:		
	Other Material: Cellulose 45. %, Synthetic fibers 5. %, Non-fibrous 50. %		
012606-06-14A	506021003-27	*No*	NAD
14	**Location:** Building 1, Roof		
	Description: Grey, Homogeneous, Non-Fibrous, HVAC Sealant		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-14B	506021003-28	*No*	NAD
14	**Location:** Building 1, Roof		
	Description: Grey, Homogeneous, Non-Fibrous, HVAC Sealant		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-15A	506021003-29	*No*	NAD
15	**Location:** Building 1, Roof		
	Description: Black, Homogeneous, Non-Fibrous, Sealant		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-15B	506021003-30	*Yes*	15 %
15	**Location:** Building 1, Roof		
	Description: Black, Homogeneous, Non-Fibrous, Sealant		
	Asbestos Types: Chrysotile 15. %		
	Other Material: Non-fibrous 85. %		

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RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-16A	506021003-31	*No*	NAD
16	**Location:** Building 7, Roof		
	Description: Black, Homogeneous, Non-Fibrous, Sealant		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-16B	506021003-32	*Yes*	5 %
16	**Location:** Building 8, Roof		
	Description: Black, Homogeneous, Non-Fibrous, Sealant		
	Asbestos Types: Chrysotile 5. %		
	Other Material: Cellulose 25. %, Non-fibrous 70. %		
012606-06-17A	506021003-33	*Yes*	5 %
17	**Location:** Building 7, Roof		
	Description: Black, Heterogeneous, Fibrous, Built Up Roof		
	Asbestos Types: Chrysotile 5. %		
	Other Material: Cellulose 50. %, Fibrous glass 5. %, Synthetic fibers 5. %, Non-fibrous 35. %		
012606-06-17B	506021003-34		NA/PS
17	**Location:** Building 8, Roof		
	Description: Built Up Roof		
	Asbestos Types:		
	Other Material:		
012606-06-18A	506021003-35	*Yes*	2 %
18	**Location:** Building 8, Interior		
	Description: Grey, Homogeneous, Non-Fibrous, Window Glazing		
	Asbestos Types: Chrysotile 2. %		
	Other Material: Non-fibrous 98. %		

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Axiom Partners, Inc.
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Date Received 02/01/06 AmeriSci Job No.506021003
Date Examined 02/06/06 **P.O. #** 1131.378

RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-18B	506021003-36		NA/PS
18	**Location:** Building 8, Interior		
	Description: Window Glazing		
	Asbestos Types:		
	Other Material:		
012606-06-19A	506021003-37	***Yes***	15 %
19	**Location:** Building 4, Roof		
	Description: Black, Homogeneous, Fibrous, Sealant		
	Asbestos Types: Chrysotile 15. %		
	Other Material: Non-fibrous 85. %		
012606-06-19B	506021003-38		NA/PS
19	**Location:** Building 6, Roof		
	Description: Sealant		
	Asbestos Types:		
	Other Material:		
012606-06-20A	506021003-39	***No***	NAD
20	**Location:** Building 4, Roof		
	Description: Black, Heterogeneous, Fibrous, Built Up Roof		
	Asbestos Types:		
	Other Material: Cellulose 45. %, Synthetic fibers 5. %, Non-fibrous 50. %		
012606-06-20B	506021003-40	***No***	NAD
20	**Location:** Building 6, Roof		
	Description: Black, Heterogeneous, Fibrous, Built Up Roof		
	Asbestos Types:		
	Other Material: Cellulose 45. %, Synthetic fibers 5. %, Non-fibrous 50. %		

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RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-21A	506021003-41	*Yes*	4 %
21	**Location:** Between Buildings 7/8		
	Description: Off-White, Homogeneous, Non-Fibrous, Expansion Joint		
	Asbestos Types: Chrysotile 4. %		
	Other Material: Non-fibrous 96. %		
012606-06-21B	506021003-42		NA/PS
21	**Location:** Between Buildings 7/8		
	Description: Expansion Joint		
	Asbestos Types:		
	Other Material:		
012606-06-22A	506021003-43	*No*	NAD
22	**Location:** Building 3, Under Corrugated Metal		
	Description: Black, Heterogeneous, Fibrous, Asphalt Shingle Siding		
	Asbestos Types:		
	Other Material: Cellulose 30. %, Non-fibrous 70. %		
012606-06-22B	506021003-44	*No*	NAD
22	**Location:** Building 3, Under Corrugated Metal		
	Description: Black, Heterogeneous, Fibrous, Asphalt Shingle Siding		
	Asbestos Types:		
	Other Material: Cellulose 30. %, Non-fibrous 70. %		
012606-06-23A	506021003-45	*Yes*	2 %
23	**Location:** Building 3		
	Description: Grey, Homogeneous, Non-Fibrous, Window Glazing		
	Asbestos Types: Chrysotile 2. %		
	Other Material: Non-fibrous 98. %		

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P.O. # 1131.378

RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-23B	506021003-46		NA/PS
23	**Location:** Building 3		
	Description: Window Glazing		
	Asbestos Types:		
	Other Material:		
012606-06-24A	506021003-47	*Yes*	4 %
24	**Location:** Building 6		
	Description: Grey, Homogeneous, Non-Fibrous, Window Glazing		
	Asbestos Types: Chrysotile 4. %		
	Other Material: Non-fibrous 96. %		
012606-06-24B	506021003-48		NA/PS
24	**Location:** Building 6		
	Description: Window Glazing		
	Asbestos Types:		
	Other Material:		
012606-06-25A	506021003-49	*No*	NAD
25	**Location:** Building 4		
	Description: Brown, Homogeneous, Non-Fibrous, Window Glazing		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-06-25B	506021003-50	*No*	NAD
25	**Location:** Building 3		
	Description: Brown, Homogeneous, Non-Fibrous, Window Glazing		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		

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P.O. # 1131.378

RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-26A	506021003-51	*Yes*	8 %
26	**Location:** Building 5, Elevated Floor		
	Description: Grey, Homogeneous, Non-Fibrous, 12"x12" Tile		
	Asbestos Types: Chrysotile 8. %		
	Other Material: Non-fibrous 92. %		
012606-06-26B	506021003-52		NA/PS
26	**Location:** Building 5, Elevated Floor		
	Description: 12"x12" Tile		
	Asbestos Types:		
	Other Material:		
012606-06-27A	506021003-53.1	*No*	NAD
27	**Location:** Building 5, Elevated Floor		
	Description: Black, Homogeneous, Fibrous, Paper Backing		
	Asbestos Types:		
	Other Material: Cellulose 60. %, Non-fibrous 40. %		
012606-06-27A	506021003-53.2	*Yes*	10 %
27	**Location:** Building 5, Elevated Floor		
	Description: Black, Homogeneous, Non-Fibrous, Paper Backing		
	Asbestos Types: Chrysotile 10. %		
	Other Material: Non-fibrous 90. %		
	Comment: Black mastic on Paper and Tile		

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Wakefield, MA 01880

Date Received 02/01/06
Date Examined 02/06/06

AmeriSci Job No.506021003
P.O. # 1131.378

RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-27B	506021003-54.1	*No*	NAD
27	**Location:** Building 5, Elevated Floor		
	Description: Black, Homogeneous, Fibrous, Paper Backing		
	Asbestos Types:		
	Other Material: Cellulose 60. %, Non-fibrous 40. %		
012606-06-27B	506021003-54.2	*Yes*	10 %
27	**Location:** Building 5, Elevated Floor		
	Description: Black, Homogeneous, Non-Fibrous, Paper Backing		
	Asbestos Types: Chrysotile 10. %		
	Other Material: Non-fibrous 90. %		
	Comment: Black mastic on Paper and Tile		
012606-06-28A	506021003-55	*Yes*	3 %
28	**Location:** Building 5		
	Description: Tan, Homogeneous, Non-Fibrous, Window Glazing		
	Asbestos Types: Chrysotile 3. %		
	Other Material: Non-fibrous 97. %		
012606-06-28B	506021003-56		NA/PS
28	**Location:** Building 5		
	Description: Window Glazing		
	Asbestos Types:		
	Other Material:		

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PLM Bulk Asbestos Report

Axiom Partners, Inc.
Attn: Sean Hurley
979 Main Street
Wakefield, MA 01880

Date Received 02/01/06
Date Examined 02/06/06

AmeriSci Job No.506021003
P.O. # 1131.378

RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-29A	506021003-57	*No*	NAD
29	**Location:** Shed, Throughout		
	Description: Brown, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Synthetic fibers 10. %, Non-fibrous 90. %		
012606-06-29B	506021003-58	*No*	NAD
29	**Location:** Shed, Throughout		
	Description: Brown, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Synthetic fibers 10. %, Non-fibrous 90. %		
012606-06-30A	506021003-59	*No*	NAD
30	**Location:** Shed, Throughout		
	Description: Brown/Off-White, Homogeneous, Fibrous, Dry Wall		
	Asbestos Types:		
	Other Material: Cellulose 25. %, Non-fibrous 75. %		
012606-06-30B	506021003-60	*No*	NAD
30	**Location:** Shed, Throughout		
	Description: Brown/Off-White, Homogeneous, Fibrous, Dry Wall		
	Asbestos Types:		
	Other Material: Cellulose 15. %, Non-fibrous 85. %		
012606-06-31A	506021003-61	*Yes*	5 %
31	**Location:** Shed, Under Wood Paneling Throughout		
	Description: Brown, Homogeneous, Non-Fibrous, Glue		
	Asbestos Types: Chrysotile 5. %		
	Other Material: Non-fibrous 95. %		

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Date Examined 02/06/06

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P.O. # 1131.378

RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-06-31B	506021003-62		NA/PS
31	**Location:** Shed, Under Wood Paneling Throughout		
	Description: Glue		
	Asbestos Types:		
	Other Material:		
012606-06-32A	506021003-63	*No*	NAD
32	**Location:** Shed, Under Wood Paneling Throughout		
	Description: Black, Homogeneous, Non-Fibrous, Seam Paper		
	Asbestos Types:		
	Other Material: Cellulose 60. %, Non-fibrous 40. %		
012606-06-32B	506021003-64	*No*	NAD
32	**Location:** Shed, Under Wood Paneling Throughout		
	Description: Black, Homogeneous, Fibrous, Seam Paper		
	Asbestos Types:		
	Other Material: Cellulose 60. %, Non-fibrous 40. %		
012606-04-01A	506021003-65	*No*	NAD
1	**Location:** Building 2, Front Porch/Stairwell Entrance		
	Description: Grey, Homogeneous, Non-Fibrous, 12"x12" Tile		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-04-01B	506021003-66	*No*	NAD
1	**Location:** Building 2, Front Porch/Stairwell Entrance		
	Description: Grey, Homogeneous, Non-Fibrous, 12"x12" Tile		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		

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RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-04-02A	506021003-67	*No*	NAD
2	**Location:** Building 2, Front Porch/Stairwell Entrance		
	Description: Yellow, Homogeneous, Non-Fibrous, Assoc. Mastic		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-04-02B	506021003-68	*No*	NAD
2	**Location:** Building 2, Front Porch/Stairwell Entrance		
	Description: Yellow, Homogeneous, Non-Fibrous, Assoc. Mastic		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-04-03A	506021003-69	*No*	NAD
3	**Location:** Building 2, 2nd Floor Bathroom		
	Description: Grey, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Cellulose 20. %, Fibrous glass 5. %, Non-fibrous 75. %		
012606-04-03B	506021003-70	*No*	NAD
3	**Location:** Building 2, 2nd Floor Bathroom		
	Description: Grey, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Cellulose 20. %, Fibrous glass 5. %, Non-fibrous 75. %		
012606-04-04A	506021003-71	*No*	NAD
4	**Location:** Building 2, 2nd Floor Bathroom		
	Description: Brown, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Cellulose 25. %, Non-fibrous 75. %		

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Date Examined 02/06/06

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RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-04-04B	506021003-72	*No*	NAD
4	**Location:** Building 2, 2nd Floor Bathroom		
	Description: Brown, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Cellulose 25. %, Non-fibrous 75. %		
012606-04-05A	506021003-73	*No*	NAD
5	**Location:** Building 2, 2nd Floor		
	Description: Off-White, Homogeneous, Fibrous, Insulation		
	Asbestos Types:		
	Other Material: Cellulose 15. %, Non-fibrous 85. %		
012606-04-05B	506021003-74		NA
	Location: Building 2, 2nd Floor		
	Description: Sample Not Submitted		
	Asbestos Types:		
	Other Material:		
012606-04-06A	506021003-75	*No*	NAD
6	**Location:** Building 2, Roof		
	Description: Black, Homogeneous, Fibrous, Shingle		
	Asbestos Types:		
	Other Material: Cellulose 60. %, Non-fibrous 40. %		
012606-04-06B	506021003-76	*No*	NAD
6	**Location:** Building 2, Roof		
	Description: Black, Homogeneous, Fibrous, Shingle		
	Asbestos Types:		
	Other Material: Cellulose 60. %, Non-fibrous 40. %		

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RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-04-07A	506021003-77	*No*	NAD
7	**Location:** Building 2, Throughout (Kitchen)		
	Description: Brown/Off-White, Homogeneous, Non-Fibrous, Cementitious, Dry Wall		
	Asbestos Types:		
	Other Material: Cellulose 5. %, Non-fibrous 95. %		
012606-04-07B	506021003-78	*No*	NAD
7	**Location:** Building 2, Throughout (Kitchen)		
	Description: Brown/Off-White, Homogeneous, Non-Fibrous, Cementitious, Dry Wall		
	Asbestos Types:		
	Other Material: Cellulose 5. %, Non-fibrous 95. %		
012606-04-07C	506021003-79	*No*	NAD
7	**Location:** Building 2, Throughout (Living Room)		
	Description: Brown/Off-White, Homogeneous, Non-Fibrous, Cementitious, Dry Wall		
	Asbestos Types:		
	Other Material: Cellulose 5. %, Non-fibrous 95. %		
012606-04-08A	506021003-80	*No*	NAD
8	**Location:** Building 2		
	Description: Brown, Homogeneous, Fibrous, Insulation		
	Asbestos Types:		
	Other Material: Cellulose 50. %, Non-fibrous 50. %		
012606-04-08B	506021003-81	*No*	NAD
8	**Location:** Building 2		
	Description: Brown, Homogeneous, Fibrous, Insulation		
	Asbestos Types:		
	Other Material: Cellulose 50. %, Non-fibrous 50. %		

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RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-04-09A	506021003-82	*Yes*	20 %
9	**Location:** Building 2, First Floor Kitchen		
	Description: Brown, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types: Chrysotile 20. %		
	Other Material: Cellulose 10. %, Non-fibrous 70. %		
012606-04-09B	506021003-83		NA/PS
9	**Location:** Building 2, First Floor Kitchen		
	Description: Sheet Flooring		
	Asbestos Types:		
	Other Material:		
012606-04-10A	506021003-84	*Yes*	20 %
10	**Location:** Building 2, First Floor Kitchen		
	Description: Brown/Off-White, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types: Chrysotile 20. %		
	Other Material: Cellulose 10. %, Non-fibrous 70. %		
012606-04-10B	506021003-85		NA/PS
10	**Location:** Building 2, First Floor Kitchen		
	Description: Sheet Flooring		
	Asbestos Types:		
	Other Material:		
012606-04-11A	506021003-86	*No*	NAD
11	**Location:** Building 2, First Floor Kitchen		
	Description: Grey, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Cellulose 30. %, Synthetic fibers 5. %, Non-fibrous 65. %		

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RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-04-11B	506021003-87	*No*	NAD
11	**Location:** Building 2, First Floor Kitchen		
	Description: Grey, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Cellulose 30. %, Synthetic fibers 5. %, Non-fibrous 65. %		
012606-04-12A	506021003-88	*Yes*	20 %
12	**Location:** Building 2, First Floor Bedroom Off Kitchen		
	Description: Tan, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types: Chrysotile 20. %		
	Other Material: Cellulose 10. %, Non-fibrous 70. %		
012606-04-12B	506021003-89		NA/PS
12	**Location:** Building 2, First Floor Bedroom Off Kitchen		
	Description: Sheet Flooring		
	Asbestos Types:		
	Other Material:		
012606-04-13A	506021003-90	*No*	NAD
13	**Location:** Building 2, First Floor Kitchen		
	Description: Off-White, Homogeneous, Non-Fibrous, Mastic		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-04-13B	506021003-91	*No*	NAD
13	**Location:** Building 2, First Floor Kitchen		
	Description: Off-White, Homogeneous, Non-Fibrous, Mastic		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		

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RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-04-14A	506021003-92	*No*	NAD
14	**Location:** Building 2, Basement		
	Description: Grey, Homogeneous, Non-Fibrous, 12"x12" Tile		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-04-14B	506021003-93	*No*	NAD
14	**Location:** Building 2, Basement		
	Description: Grey, Homogeneous, Non-Fibrous, 12"x12" Tile		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-04-15A	506021003-94	*No*	NAD
15	**Location:** Building 2, Basement		
	Description: Yellow, Homogeneous, Non-Fibrous, Assoc. Mastic		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-04-15B	506021003-95	*No*	NAD
15	**Location:** Building 2, Basement		
	Description: Yellow, Homogeneous, Non-Fibrous, Assoc. Mastic		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-04-16A	506021003-96	*No*	NAD
16	**Location:** Building 2, Basement		
	Description: Grey, Homogeneous, Non-Fibrous, Cementitious, Chimney Patch		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		

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RE 1131.378; 207 Marston St.; Lawrence, MA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
012606-04-16B	506021003-97	*No*	NAD
16	**Location:** Building 2, Basement		
	Description: Grey, Homogeneous, Non-Fibrous, Cementitious, Chimney Patch		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
012606-04-17A	506021003-98	*No*	NAD
17	**Location:** Building 2, Basement		
	Description: Brown/Off-White, Homogeneous, Fibrous, 2'x2' Ceiling Tile		
	Asbestos Types:		
	Other Material: Cellulose 90. %, Non-fibrous 10. %		
012606-04-17B	506021003-99	*No*	NAD
17	**Location:** Building 2, Basement		
	Description: Brown/Off-White, Homogeneous, Fibrous, 2'x2' Ceiling Tile		
	Asbestos Types:		
	Other Material: Cellulose 90. %, Non-fibrous 10. %		
012606-04-18A	506021003-100	*No*	NAD
18	**Location:** Building 2, 1st Floor Dining Room		
	Description: Grey, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Cellulose 30. %, Synthetic fibers 5. %, Non-fibrous 65. %		
012606-04-18B	506021003-101	*No*	NAD
18	**Location:** Building 2, 1st Floor Dining Room		
	Description: Grey, Homogeneous, Fibrous, Sheet Flooring		
	Asbestos Types:		
	Other Material: Cellulose 30. %, Synthetic fibers 5. %, Non-fibrous 65. %		

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Date Examined 02/06/06 **P.O. #** 1131.378
Page 22 **of** 22

RE 1131.378; 207 Marston St.; Lawrence, MA

Reporting Notes:

Analyzed by: John A. Burns _____; Date Analyzed: 2/6/06

*NAD/NSD = no asbestos detected; NVA = no visible asbestos; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis by EPA 600/M4-82-020 per 40 CFR 763 (NVLAP Lab #102079-0); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested.

Reviewed By: _____

Relinquished By: Date/Time:

Received By: Date/Time:

Relinquished By: Date/Time:

Received By: Date/Time:

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BULK CHAIN OF CUSTODY FORM

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AMERISCI #: 506021013

Company Name: *AXIOM PARTNERS, INC.*

Project:

Street Address: *979 MAIN STREET*

Project Address: *207 Marston St. Lawrence, MA*

Project #: *1131.378*

City: *WAKEFIELD* State: *MA* Zip: *01880*

Project Manger: *Sean Hurley*

Phone: *(781) 213-9198* Fax: *(781) 213-6992*

Analysis: *X* PLM *X* Positive Stop __Qualitative __Point Count __NOB (Prep) TEM

Cell/Page #: Cell/Page #:

Turnaround Time: *5 Day* Fax Copy By: *2-7-6*

Results to: *TREVOR HERRON/ SEAN HURLEY*

Sampled By: *Matt Buccella* Date: *1-31-6*

Special Instructions or Comments: *PLEASE FAX A COPY OF RESULTS TO 781-337-0342*

Lab ID	Field ID	Location	Sample Description	Homogenous Area
	012606-06-01A	Building 1, Behind Wood Panels in Perimeter of Building	Foil Wrap Paper Insulation	Yes
	012606-06-01B	Building 1, Behind Wood Panels in Perimeter of Building	Foil Wrap Paper Insulation	Yes
	012606-06-02A	Building 1, Throughout	Sheet Flooring, Mottled	Yes
	012606-06-02B	Building 1, Throughout	Sheet Flooring, Mottled	Yes
	012606-06-03A	Building 1, Hallway, Conference Room, and Office	Sheet Flooring, Green	Yes
	012606-06-03B	Building 1, Hallway, Conference Room, and Office	Sheet Flooring, Green	Yes
	012606-06-04A	Building 1, Under Carpet in the Office Adjacent Conference Room	Sheet Flooring, Black Web-like Lines	Yes

012606-06-[illegible]	Building 1, Under Carpet in the Office Adjacent Conference Room	Sheet Flooring, Black Web-like Lines	Yes
012606-06-05A	Building 1, Central Portion	1' X 1' Ceiling Tile	Yes
012606-06-05B	Building 1, Central Portion	1' X 1' Ceiling Tile	Yes
012606-06-06A	Building 1, Throughout	Cove Base	Yes
012606-06-06B	Building 1, Throughout	Cove Base	Yes
012606-06-07A	Building 1, Throughout	Cove Base Mastic	Yes
012606-06-07B	Building 1, Throughout	Cove Base Mastic	Yes
012606-06-08A	Building 1, Conference Room	2' X 4' Ceiling Tile	Yes
012606-06-08B	Building 1, Conference Room	2' X 4' Ceiling Tile	Yes
012606-06-09A	Building 1, Offices	2' X 2' Ceiling Tile	Yes
012606-06-09B	Building 1, Offices	2' X 2' Ceiling Tile	Yes
012606-06-10A	Building 1, Above Ceiling Throughout	Fiberglass Insulation Paper	Yes
012606-06-10B	Building 1, Above Ceiling Throughout	Fiberglass Insulation Paper	Yes
012606-06-11A	Building 1, South Stairs	12" X 12" Tile	Yes
012606-06-11B	Building 1, South Stairs	12" X 12" Tile	Yes
012606-06-12A	Building 1, Throughout	Window Caulk	Yes
012606-06-12B	Building 1, Throughout	Window Caulk	Yes
012606-06-13A	Building 1, Roof	Tar and Gravel Roof	Yes
012606-06-13B	Building 1, Roof	Tar and Gravel Roof	Yes
		Gray HVAC Sealant	Yes

012606-06-14A	Building 1, Roof	Gray HVAC Sealant	Yes
012606-06-14B	Building 1, Roof	Black Flashing Sealant	Yes
012606-06-15A	Building 1, Roof	Black Flashing Sealant	Yes
012606-06-15B	Building 1, Roof	Black Flashing Sealant	Yes
012606-06-16A	Building 7, Roof	Black Flashing Sealant	Yes
012606-06-16B	Building 8, Roof	Built-Up Roof	Yes
012606-06-17A	Building 7, Roof	Built-Up Roof	Yes
012606-06-17B	Building 8, Roof	Window Glazing	Yes
012606-06-18A	Building 8, Interior	Window Glazing	Yes
012606-06-18B	Building 8, Interior	Black Flashing Sealant	Yes
012606-06-19A	Building 4, Roof	Black Flashing Sealant	Yes
012606-06-19B	Building 6, Roof	Built-Up Roof	Yes
012606-06-20A	Building 4, Roof	Built-Up Roof	Yes
012606-06-20B	Building 6, Roof	Expansion Joint	Yes
012606-06-21A	Between Buildings 7/8	Expansion Joint	Yes
012606-06-21B	Between Building 7/8	Asphalt Shingle Siding	Yes
012606-06-22A	Building 3, Under Corrugated Metal	Asphalt Shingle Siding	Yes
012606-06-22B	Building 3, Under Corrugated Metal	Window Glazing	Yes
012606-06-23A	Building 3	Window Glazing	Yes
012606-06-23B	Building 3		

012606-06-24A	Building 6	Window Glazing	Yes
012606-06-24B	Building 6	Window Glazing	Yes
012606-06-25A	Building 4	Window Glazing	Yes
012606-06-25B	Building 4	Window Glazing	Yes
012606-06-26A	Building 5, Elevated Floor	12" X 12" Tile	Yes
012606-06-26B	Building 5, Elevated Floor	12" X 12" Tile	Yes
012606-06-27A	Building 5, Elevated Floor	Paper Backing Under Tile (Associated with Sample # 012606-06-26A)	Yes
012606-06-27B	Building 5, Elevated Floor	Paper Backing Under Tile (Associated with Sample # 012606-06-26B)	Yes
012606-06-28A	Building 5	Window Glazing	Yes
012606-06-28B	Building 5	Window Glazing	Yes
012606-06-29A	Shed, Throughout	Sheet Flooring	Yes
012606-06-29B	Shed, Throughout	Sheet Flooring	Yes
012606-06-30A	Shed, Throughout	Drywall	Yes
012606-06-30B	Shed, Throughout	Drywall	Yes
012606-06-31A	Shed, Under Wood Paneling Throughout	Brown Glue	Yes
012606-06-31B	Shed, Under Wood Paneling Throughout	Brown Glue	Yes
012606-06-32A	Shed, Under Wood Paneling Throughout	Panel Seam Paper	Yes
012606-06-32B	Shed, Under Wood Paneling Throughout	Panel Seam Paper	Yes

50602 1003

012606-04-01A	Building 2, Front Porch/Stairwell Entrance	Light Blue 12" X 12" Tile	Yes
012606-04-01B	Building 2, Front Porch/Stairwell Entrance	Light Blue 12" X 12" Tile	Yes
012606-04-02A	Building 2, Front Porch/Stairwell Entrance	Mastic (Associated with Sample # 012606-04-01A)	Yes
012606-04-02B	Building 2, Front Porch/Stairwell Entrance	Mastic (Associated with Sample # 012606-04-01B)	Yes
012606-04-03A	Building 2, 2nd Floor Bathroom	Sheet Flooring, Top Layer Off-White	Yes
012606-04-03B	Building 2, 2nd Floor Bathroom	Sheet Flooring, Top Layer Off-White	Yes
012606-04-04A	Building 2, 2nd Floor Bathroom	Sheet Flooring, 2nd Layer Tan	Yes
012606-04-04B	Building 2, 2nd Floor Bathroom	Sheet Flooring, 2nd Layer Tan	Yes
012606-04-05A	Building 2, 2nd Floor	Sink Sound Proofing/Insulation	Yes
012606-04-05B	Building 2, 2nd Floor	Sink Sound Proofing/Insulation	
012606-04-06A	Building 2, Roof	Shingle	Yes
012606-04-06B	Building 2, Roof	Shingle	Yes
012606-04-07A	Building 2, Throughout (Kitchen)	Drywall with Skim Coat	Yes
012606-04-07B	Building 2, Throughout (Kitchen)	Drywall with Skim Coat	Yes
012606-04-07C	Building 2, Throughout (Living Room)	Drywall with Skim Coat	Yes
012606-04-08A	Building 2	Wire Insulation	Yes
012606-04-08B	Building 2	Wire Insulation	Yes
012606-04-09A	Building 2, First Floor Kitchen	Sheet Flooring, Top Layer, Brown	Yes
012606-04-09B	Building 2, First Floor Kitchen	Sheet Flooring, Top Layer, Brown	Yes

012606-04-10A	Building 2, First Floor Kitchen	Sheet Flooring, 2nd Layer	Yes
012606-04-10B	Building 2, First Floor Kitchen	Sheet Flooring, 2nd Layer	Yes
012606-04-11A	Building 2, First Floor Kitchen	Sheet Flooring, 3rd Layer	Yes
012606-04-11B	Building 2, First Floor Kitchen	Sheet Flooring, 3rd Layer	Yes
012606-04-12A	Building 2, First Floor Bedroom off Kitchen	Sheet Flooring, Tan	Yes
012606-04-12B	Building 2, First Floor Bedroom off Kitchen	Sheet Flooring, Tan	Yes
012606-04-13A	Building 2, First Floor Kitchen	Panel Mastic	Yes
012606-04-13B	Building 2, First Floor Kitchen	Panel Mastic	Yes
012606-04-14A	Building 2, Basement	12" X 12" Tile, Tan	Yes
012606-04-14B	Building 2, Basement	12" X 12" Tile, Tan	Yes
012606-04-15A	Building 2, Basement	Mastic Associated with Sample # 012606-04-14A	Yes
012606-04-15B	Building 2, Basement	Mastic Associated with Sample # 012606-04-14B	Yes
012606-04-16A	Building 2, Basement	Chimney Patch, White	Yes
012606-04-16B	Building 2, Basement	Chimney Patch, White	Yes
012606-04-17A	Building 2, Basement	2' X 2' Ceiling Tile	Yes
012606-04-17B	Building 2, Basement	2' X 2' Ceiling Tile	Yes
012606-04-18A	Building 2, 1st Floor Dining Room	Sheet Flooring, Tan	Yes
012606-04-18B	Building 2, 1st Floor Dining Room	Sheet Flooring, Tan	Yes

Relinquished By:		Date/Time:	
Received By:		Date/Time:	
Relinquished By:		Date/Time:	
Received By:		Date/Time:	

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AMERISCI #:

Company Name: *AXIOM PARTNERS, INC.*

Street Address: *979 MAIN STREET*

City: *WAKEFIELD* State: *MA* Zip: *01880*

Phone: *(781) 213-9198* Fax: *(781) 213-6992*

Cell/Page #: Cell/Page #:

Results to: *TREVOR HERRON/ SEAN HURLEY*

Special Instructions or Comments:

Project: *Town of Bedford High School*

Project Address: *207 Marston St. Lawrence, MA*

Project #: ~~1479.007~~ 1191.37

Project Manger: ~~Edward Kearney~~ Sean Hurley

Analysis: X PLM X Positive Stop __Qualitative __Point Count __NOB (Prep) TEM

Turnaround Time: *5 Day*

Mail Fax ~~Fax~~ Copy By: ~~12-21-5~~ 02-7-06

Sampled By: *Matt Buccella*

Date: *12-14-5*

Lab ID	Field ID	Location	Sample Description	Homogenous Area
	012606-06-01A	Building 1, Behind Wood Panels in Perimeter of Building	Foil Wrap Paper Insulation	Yes
	012606-06-01B	Building 1, Behind Wood Panels in Perimeter of Building	Foil Wrap Paper Insulation	Yes
	012606-06-02A	Building 1, Throughout	Sheet Flooring, Mottled	Yes
	012606-06-02B	Building 1, Throughout	Sheet Flooring, Mottled	Yes
	012606-06-03A	Building 1, Hallway, Conference Room, and Office	Sheet Flooring, Green	Yes
	012606-06-03B	Building 1, Hallway, Conference Room, and Office	Sheet Flooring, Green	Yes
	012606-06-04A	Building 1, Under Carpet in the Office Adjacent Conference Room	Sheet Flooring, Black Web-like Lines	Yes

RTN 3-18126

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of: American Recycling of Massachusetts, Inc. d/b/a Tombarello & Sons	ADMINISTRATIVE CONSENT ORDER AND NOTICE OF NONCOMPLIANCE File No. ACOP-NE-00-9013-123

I. THE PARTIES

A. The Department of Environmental Protection ("Department" or "DEP") is a duly constituted agency of the Commonwealth of Massachusetts ("Commonwealth"). Its principal office is located at One Winter Street, Boston, Massachusetts 02108, and it maintains a regional office at 205A Lowell Street, Wilmington, Massachusetts 01887.

B. American Recycling of Massachusetts, Inc. ("American" or "Respondent"), doing business as Tombarello & Sons, is a Massachusetts corporation with its principal place of business at 207 Marston Street, Lawrence, Massachusetts. American is a metal recycling business, which accepts various types of metals, which are separated, crushed and baled for shipment.

II. DEFINITIONS; STATEMENT OF LAW; STATEMENT OF FACTS; DETERMINATIONS

A. Definitions: Unless otherwise indicated, the terms used herein shall have the meaning given to them by the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, M.G.L. c. 21E ("M.G.L. c. 21E") and/or the Massachusetts Contingency Plan ("MCP") at 310 CMR 40.0000 et seq. In addition, the following term shall have the meaning defined herein:

1. Site shall mean the property located at 207 Marston Street, Lawrence, Massachusetts, and any other place or area where the release(s) of oil and/or hazardous material(s) at or from said property has come to be located.

B. Statement of Law:

1. The Department is charged with the implementation and enforcement of M.G.L. c. 21E and the regulations promulgated thereunder at 310 CMR 40.0000 et seq.

2. The Department is charged with the implementation and

enforcement of the Massachusetts Hazardous Waste Management Act, M.G.L. c. 21C and the regulations promulgated thereunder at 310 C.M.R. 30.000 et seq.

3. The Department is charged with the implementation of M.G.L. c. 21, §§ 26-53 and the regulations promulgated thereunder at 314 CMR 5.00 et seq. and 314 C.M.R. 12.00 et seq.

4. The Department is authorized to assess civil administrative penalties pursuant to M.G.L. c. 21A, § 16 and the regulations promulgated thereunder at 310 CMR 5.00 et seq.

5. Certain provisions of M.G.L. c. 21E and the MCP provide as follows:

Release Notification

a. 310 CMR 40.0333(1)(b) requires responsible parties or potentially responsible parties to notify the Department of a release or threat of release by submitting a completed Release Notification Form to the Department.

b. 310 CMR 40.0311(7) requires notification to the Department not more than two hours after obtaining knowledge of any release of any oil and/or hazardous material, in any quantity or concentration, that poses or could pose an Imminent Hazard.

c. 310 CMR 40.0321(2)(b) provides that a measurement of polychlorinated biphenyl ("PCBs") in surficial soil equal to or greater than 10 mg/kg and located within 500 feet of a residential property or playground, unless access by children is controlled or prevented could pose an Imminent Hazard to human health.

d. 310 CMR 40.1600 states that the Reportable Concentration, Soil Category 1 (RSC-1), for polychlorinated biphenyls ("PCB") is 2 mg/kg.

e. 310 CMR 40.0006 defines knowledge as: (a) actual knowledge; (b) knowledge a person acting in a reasonably prudent and intelligent

manner would have, but for that person's willful, knowing or negligent avoidance of learning about the fact or facts in question. In determining whether a person has acted in a reasonably prudent and intelligent manner, any specialized knowledge or training possessed by that person and the circumstances surrounding the facts in question shall be taken into account.

Interim Deadlines

f. 310 CMR 40.0167(1) provides that the Department may establish and enforce reasonable Interim Deadlines consistent with M.G.L. c. 21E and the MCP for the furnishing of information and provision of access to documents and other information to the Department, including deadlines for compliance with Requests for Information.

Immediate Response Actions

g. 310 CMR 40.0413(2)(a) provides that conditions of Substantial Release Migration include releases that have resulted in the discharge of separate phase-oil and/or hazardous material to surface waters, subsurface structures, underground utilities or conduits.

h. 310 CMR 40.0420(1) requires Immediate Response Actions shall be taken by RPs, and may be taken by PRPs or Other Persons, in response to all releases and threats of release described in 310 CMR 40.0412.

i. 310 CMR 40.0426 (1) requires that an Imminent Hazard Evaluation be performed as part of an Immediate Response Action where a release or threat of release could pose an Imminent Hazard.

j. 310 CMR 40.0420(2) requires that Immediate Response Actions be conducted in compliance with any response actions requirements specified by the Department in its approval of Immediate Response Action Plans.

k. 310 CMR 40.0425(2)requires additional Immediate Response Action status reports to be submitted to

the Department every 6 months after submission of the initial status report.

Response Action Outcome

1. 310 CMR 40.1004 requires that a Response Action Outcome be supported by assessments and evaluations conducted pursuant to 310 CMR 40.0000.

6. Certain provisions of M.G.L. c. 21C and 310 CMR 30.000 et seq., provide as follows:

   a. 310 CMR 30.253(1)(h) provides that generators of waste oil or used oil fuel may accumulate or store waste oil in an existing underground storage tank only if it is equipped with a continuous leak detection method as described in 30.253(1)(h) 4 a-c.

   b. 310 CMR 30.253(5)(b) provides that all small quantity generators of waste oil and/or used oil fuel shall comply with 310 CMR 30.351, and all other regulations referred to therein, except 310 CMR 30.691 through 30.696 and 30.698.

   c. 310 CMR 30.253(6)(b), which refers to 30.351(9)(c) 6., a. through d. requires that a generator must post an up-to date written list, a copy of which shall be prominently posted near the telephones at the site of accumulation, with the following information: the name(s) and telephone number (s) of the emergency coordinator(s); the location(s) of the fire extinguisher(s) and spill control materials; and, if present, the fire alarms, the telephone number of the fire department, or, if there is a direct alarm system, instructions on how to activate it, or both; and evacuation routes, where applicable.

   d. 310 CMR 30.302 provides that any person who generates a waste shall determine if that waste is a hazardous waste and if it is determined to be hazardous, determine whether the waste is subject to land disposal restrictions.

   e. 310 CMR 30.314(1)(a) provides that the generator shall ensure that all required information has

been provided in a complete and accurate manner.

f. 310 CMR 30.340(1)(b) requires that each container in which hazardous waste is being accumulated shall be clearly marked with the words, "Hazardous Waste," with the type of hazardous waste clearly identified, the type of hazards associated with the waste, and the date upon which the accumulation begins. The marks and labels must be clearly visible for inspection.

g. 310 CMR 30.340(1)(f) requires all containers and above-ground tanks for hazardous waste to have an underlying surface designed to be, and operated so that it is, free of cracks and gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation.

h. 310 CMR 30.351(8) provides that a very small quantity generator of hazardous waste shall comply with certain requirements governing accumulation found in 310 CMR 30.340(1)(a) and (b).

i. 310 CMR 30.353(5) requires very small quantity generators of hazardous waste to register with the Department by notifying the Department in writing of its activity involving hazardous waste or regulated recyclable material.

j. 310 CMR 30.685 requires that a container holding hazardous waste shall always be closed during storage, except when waste is being added or removed.

k. 310 CMR 30.686 requires an owner or operator to inspect areas where containers are stored, looking for leaks and deterioration of containers or container systems.

7. Certain provisions of M.G.L. c. 21, §§ 26-53, 314 CMR 5.00 et seq., and 314 CMR 12.00 et seq., provide as follows:

a. 310 CMR 5.03(1) provides no person shall discharge pollutants to groundwaters of the Commonwealth without a currently valid permit from the Director pursuant to M.G.L.c.21, s.43 and 314 CMR 5.00,

unless exempted in 314 CMR 5.05. No person shall construct, install, modify, operate or maintain an outlet for such a discharge or any treatment works required to treat such discharge without having first obtained a discharge permit in accordance with 314 CMR 5.03(1) this subsection and written approval from the Department for such activity.

b. 314 CMR 5.03(2) provides that activities which constitute discharges of pollutants requiring a permit under 314 CMR 5.03(1) include, but are not limited to: any facility which discharges a liquid effluent onto or below the land surface; any facility which discharges a liquid effluent to a percolation pit, pond, or lagoon; any facility which discharges a liquid effluent via subsurface leaching facilities including but not limited to: leaching pits, galleries, chambers, trenches, fields, and pipes; any facility which discharges a liquid effluent into a Class V injection well as defined in 310 CMR 27.00; or any facility with an associated unlined pit, pond, lagoon, or surface impoundment in which wastewaters or sludges are collected, stored, treated, or disposed and from which a liquid portion seeps into the ground.

c. 314 CMR 12.08(1) provides that no person shall discharge or cause to be discharged to a Publicly Owned Treatment Works ("POTW") any substance, material, or wastewaters than can harm the sewers, wastewater treatment process or equipment, have an adverse effect on the receiving waters or can otherwise endanger life, limb, public property, or constitute a nuisance.

d. 314 CMR 12.08(3) provides that any indirect discharger shall comply with the local sewer use rules and regulations.

e. Pertinent sections of the Greater Lawrence Sewer District ("GLSD") rules and regulations as they apply to this Consent Order are attached hereto as "Attachment A" and are incorporated herein by reference.

C. Statement of Facts: The Department makes the following factual allegations:

1. American is a Massachusetts corporation. Its principal place of business is located at 207 Marston Street, Lawrence, Massachusetts.

2. While assessing the Site for potential purchase from Tombarello Enterprises, Inc., American hired W.Z. Baumgartner & Sons, Inc. ("Baumgartner") to complete an environmental site assessment of the property, which included soil borings, surface soil samples, and four monitoring wells. Historic uses of the property included metal recycling.

3. During the environmental site assessment, levels exceeding the Reportable Concentration, Soil Category 1 ("RSC-1") of the following hazardous materials were detected: benzo(a)anthracene (58.6 mg/kg); benzo(a)pyrene (32.2 mg/kg); benzo(b)fluoranthene (39.5 mg/kg); benzo(k)fluoranthene (22.6 mg/kg); chrysene (60.4 mg/kg); Total Petroleum Hydrocarbons (2,740 mg/kg); and lead (3,470 mg/kg).

4. Baumgartner reported the foregoing reportable conditions to American in August 1998. Of particular significance, Baumgartner reported that there was 10.59 mg/kg of PCBs in the surface soil sample obtained at location SS-8 and 59 mg/kg PCBs in boring sample SB-3. Baumgartner also reported that residential properties and a ball field were located within 500 feet of soil sample locations SB-3 and SS-8.

5. On December 11, 1998, American took ownership of the Site, formerly owned by Tombarello Enterprises, Inc.

6. On January 22, 1999, the Department received a copy of Baumgartner's environmental site assessment report as a result of a Request for Information issued by the Department to Tombarello Enterprises, Inc.

7. On February 17, 1999, the Department performed a compliance inspection of the Site. During the compliance inspection, the Department advised American that it needed to comply with hazardous waste and waste oil storage and handling regulations. Additionally, the Department informed American that it needed to clean the oily sludge located on the floor of the baler/press room and assess the outfall location of a

floor drain in the press room.

8. On March 31, 1999, the Department issued a Notice of Responsibility ("NOR") to American for the release of the reportable conditions described in paragraphs 3 through 4 of Section II. C. of this Consent Order. Release Tracking Number ("RTN") 3-18126 was assigned to this release. The NOR advised American of its responsibility to conduct and Immediate Response Action Plan ("IRAP") to conduct an Imminent Hazard evaluation and to comply with the MCP.

9. On April 21, 1999, American submitted an IRAP to assess the Imminent Hazard Conditions at the site. The Department verbally approved the IRAP, but set out conditions as part of the approval. On June 1, 1999, American submitted a modified IRA Plan which indicated that an imminent hazard condition existed and that it would construct a perimeter fence to prevent access to the Site by June 16, 1999. The Department verbally approved the modified IRA Plan.

10. On June 21, 1999, the Department conducted a compliance inspection. The Department made the following observations at the Site:

    a. An incomplete fence that did not prevent access to the Site;

    b. No registration with the Department of American's hazardous waste and waste oil generation status;

    c. Waste oil accumulation areas that were not distinguishable from generation areas;

    d. No posted signs with emergency information in the hazardous waste accumulation areas;

    e. Numerous areas of waste spillage throughout the facility;

    f. Treatment tanks, tank hoods, wooden floor boards, and walls from a discontinued cyanide-based recycling process;

    g. A 500-gallon underground waste oil tank without leak detection devices and which was not double-

walled;

h. Two inches of oily sludge covering the floor in the baler/press room in which an open floor drain was located;

i. Twenty-two 55-gallon drums, at least 13 of which contained oily sludge and/or solids, and all of which were sitting on a non-impervious surface in the baler/press room and which were not properly labeled;

j. Three 55-gallon drums of unidentified waste on a non-impervious surface outside to the large shear building;

k. A 55-gallon container of unidentified waste inside of the large shear building; and

l. A 100-gallon waste oil tank that was unlabeled and open.

11. As a result of the June 21, 1999 inspection, the Department issued a Field NOR to American for the release/threat of release of the oily sludge in the baler/press room. The NOR required American to "[r]emove all drums, oil and sludge from the baler/press building. Assess releases to the environment including drain in floor and integrity of floor. Implement a plan to prevent ongoing releases." RTN 3-18431 was assigned to the release.

12. On June 23, 1999, the GLSD conducted an inspection of the Site and confirmed that the drain in the baler/press room was connected to the GLSD combined sewer/water system. The GLSD discharges directly without treatment into the Merrimack River during high flow events.

13. On July 22, 1999, the Department conducted another inspection of the baler/press room and noted that the sludge and drums were removed from the room. Additionally, the Department sampled the remedial wastes generated in the baler/press room. The results of the sampling revealed the following concentrations:

a. Ethylbenzene at 1.4 mg/kg;

b. MBTE at 0.38 mg/kg;
c. Toluene at 5.9 mg/kg;
d. Xylenes at 17/mg/kg;
e. Tetrachloroethene at 1 mg/kg;
f. Trichloroethene at 0.37 mg/kg;
g. Trichlorofluoromethane at 1.5 mg/kg;
h. Barium at 450 mg/kg;
i. Cadmium at 20 mg/kg;
j. Chromium at 160 mg/kg;
k. Lead at 780 mg/kg;
l. Mercury at 12.67 mg/kg;
m. Silver at 3.5 mg/kg;
n. PCB at 120 mg/kg;
o. TPH at 45,000 mg/kg; and
p. TCLP Lead at 0.7 mg/l.

14. On July 22, 1999, the Department also observed oily waste accumulating in the baler/press room, which was reportedly being pumped onto a metal pile located outside of the building.

15. On August 24, 1999, American submitted a Release Notification Form ("RNF") to the Department for RTN 3-18431 for the release of oil and hazardous material relating to the oily sludge on the floor of the baler/press room.

16. On August 24, 1999, American submitted a Response Action Outcome Opinion ("RAO") for RTN 3-18431 in which American's Licensed Site Professional concluded that "based upon the substantial thickness and condition of concrete poured foundation floor . . . and the former discharge point of the floor drain being to the Lawrence Sanitation District sewer system . . . a release to the environment was not observed or interpreted as probable."

17. After reviewing the above RAO, the Department determined that it did not meet the performance standards required under the MCP.

18. American classified RTN 3-18126 as a Tier 2 site on April 7, 2000.

D. Determinations: Based upon the Statement of Facts set forth above, the Department alleges:

Violations of M.G.L. c. 21E and 310 CMR 40.0000 et seq.

1. Conditions at the Site constitute releases and/or threats of release to the environment of oil and/or hazardous material pursuant to M.G.L. c. 21E and the MCP.

2. The Site is a disposal site as defined by M.G.L. c. 21E and the MCP.

3. American is the owner and operator of the Site from or at which there is or has been releases and/or threats of release of oil and/or hazardous material pursuant to M.G.L. c. 21E and the MCP.

4. American is in violation of the MCP as follows:

   a. By failing to notify the Department of a release (RTN 3-18126) that poses or could pose a condition of Imminent Hazard within two hours after obtaining knowledge of a release of PCBs located within 500 feet of residential properties and a ball field as required by 310 CMR 40.0311(7);

   b. By failing to submit a completed RNF regarding the above release of PCBs to the Department as required by 310 CMR 40.0333(1)(b);

   c. By failing to conduct an Immediate Response Action ("IRA") at a site where the above release poses or could pose an Imminent Hazard as required by 310 CMR 40.0420(1);

   d. By failing to conduct an Imminent Hazard Evaluation for the above release as required by 310 CMR 40.0426;

   e. By failing to conduct an IRA in accordance with Department approval for the above release by failing to complete the construction of a fence to the approved specifications in order to control or prevent access to the site as required by 310 CMR 40.0420(2);

   f. By failing to submit a subsequent IRA Status Report, for the above stated release, 6 months after the first status report as required by 310

CMR 40.0425(2);

g. By failing to conduct an IRA for an unpermitted discharge (oily sludge from the floor of the baler/press room to the GLSD via a floor drain) resulting in a condition of Substantial Release Migration (3-18431) as required by 310 CMR 40.0420(1); and

h. By failing to meet the Performance Standard in 310 CMR 40.1004 for the RAO (3-18431) submitted on August 24, 1999 regarding the baler/press room release.

Violations of M.G.L. c. 21C and 310 CMR 30.000 et seq.

5. American is a very small quantity generator of hazardous waste and a small quantity generator of waste oil.

6. American is in violation of the hazardous waste regulations as follows:

a. By failing to determine whether the wastes it generated inside and outside of the large shear room and in the maintenance building are hazardous wastes as required by 310 CMR 30.302;

b. By accumulating and storing waste oil in a 500-gallon underground storage tank that does not have any continuous leak detection devices and was not double-walled as required by 310 CMR 3.253(1)(h)4.a.- c.;

c. By failing to post a "WASTE OIL" sign in the waste oil accumulation areas as required by 310 CMR 30.253(5)(b);

d. By failing to properly label containers in which hazardous waste or waste oil is accumulated as containing hazardous waste or waste oil located inside and outside of the large shear room and in the maintenance building as required by 310 CMR 253(5)(b), 310 CMR 351(8)(a), and 310 CMR 30.340(1)(b);

e. By failing to keep containers, located in the

baler/press room, the room under the baler/press room, and in the maintenance building, holding hazardous waste or waste oil closed during storage as required by 310 CMR 30.253(5)(b); 310 CMR 30.340(1)(a)1.c.; and 310 CMR 30.685(1);

f. By storing containers of hazardous waste on non-impervious surfaces in baler/press room, in the room under the baler/press room, and outside of the large shear building as required by 310 CMR 30.253(5)(b) and 310 CMR 30.340(1)(f);

g. By failing to keep an up-to-date list of emergency information at the sites of generation as required by 310 CMR 30.253(6)(b) and 310 CMR 30.351(9)(c)6 a.- d.;

h. By failing to clearly mark all waste accumulation areas so that they are clearly distinguishable from the areas of generation as required by 310 CMR 253(5)(b), 310 CMR 30.351(8)(b), and 310 CMR 30.340(1)(k);

i. By failing to register with and notify the Department of its activity involving hazardous waste or regulated recyclable material as required by 310 CMR 30.353(5); and

j. By failing to inspect the baler/press room, the room below the baler/press room, the large shear building, outside of the large shear building, and around the 500-gallon waste oil tank for leaks in the containers stored therein as required by 310 CMR 30.253(5)(b), 310 CMR 351 (8)(a), 310 CMR 30.340(1)(a)1.d., and 310 CMR 30.686.

Violations of M.G.L. c. 21, §§ 26-53, 314 CMR 12.00 et seq. and 314 CMR 5.00 et seq.

7. The floor drain located in the baler/press room is connected to the GLSD's combined sewer/water system.

8. The GLSD operates a POTW and has adopted rules and regulations covering discharge of wastewater, drainage, substances or waste.

9. American is in violation of 314 CMR 12.08(1), 314 CMR

12.08(3), Section 2.1(a,b,d,f,g,k,m and n) of the GLSD rules and regulations, and 314 CMR 5.03 as follows:

a. By discharging or causing to be discharged PCBs from the floor of the baler/press room to the GLSD POTW, which could harm the sewers, wastewater treatment process or equipment, have an adverse effect on the receiving waters or can otherwise endanger life, limb, public property, or constitute a nuisance as prohibited by 314 CMR 12.08(1);

b. By failing to comply with the GLSD rules and regulations, as required by 314 CMR 12.08(3), in the following manner: by discharging wastewater containing PCBs in sufficient quantity, either singly or by interaction with any pollutants, to injure or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create a toxic effect in the receiving waters of the POTW, or to exceed the limitation set forth in a National Pretreatment Standard; and

c. By discharging wastewater from the baler/press room onto a metal pile located on the ground outside of the baler/press room building without a permit as prohibited by 314 CMR 5.03.

III. DISPOSITION AND ORDER

Based on the foregoing Statement of Facts and Determinations, as alleged by the Department, and pursuant to its authority under M.G.L. c. 21, §§26-53, M.G.L. c. 21E, § 9, M.G.L. c. 21C, § 5, M.G.L. c. 30A, § 10, and M.G.L. c. 21A, § 16, the Department issued this Consent Order. As a result of discussions which have taken place between the Department and American (collectively "the Parties") and without adjudication of any facts, law or determinations set forth above, the Parties have agreed to negotiate this Consent Order, rather than expend the time and resources necessary to adjudicate this matter. American agrees to the Department's authority and jurisdiction to issue and enforce this Consent Order, and further agrees to perform the actions and to pay the penalties, as set forth herein.

A. This Consent Order shall not constitute, be construed as, or operate as an admission by American that it violated any law or regulation and shall not constitute any evidence or implication

of any such violation. The decision of American to enter into this Consent Order shall not be construed as an admission by American that it agrees with any of the Department's allegations of facts and determinations or waiver of any defenses that American might raise in any proceeding to enforce this Consent Order. However, American agrees not to contest the enforceability of this Consent Order in any proceeding to enforce this Consent Order.

B. This Consent Order shall be binding upon American, its successors and assigns. American shall not violate this Consent Order, nor shall American allow or suffer its employees, agents, contractors, consultants or persons acting for or at its direction to violate this Consent Order. A violation of this Consent Order by American's employee, agent, contractor, consultant or person acting for or at its direction shall constitute a violation of this Consent Order by American.

C. This Consent Order also serves as a Notice of Noncompliance issued pursuant to M.G.L. c. 21A, §16 and 310 CMR 5.00 for American's noncompliance with M.G.L. c. 21, §§ 26-53, M.G.L. c. 21C and M.G.L. c. 21E and various sections of 310 CMR 40.0000 et seq., 310 CMR 30.000 et seq., 314 CMR 5.00 et seq., and 314 CMR 12.00 et seq., as specifically described in Section II. D., above.

D. For the violations alleged in Section II. D., above, American shall pay an administrative penalty in the total amount of up to Forty Thousand Dollars ($40,000) as follows:

1. Within thirty (30) days of the effective date of this Consent Order, Respondent shall pay Thirty Thousand Dollars ($30,000); and

2. In the event American violates any provisions of this Consent Order or further violates the regulations cited in Section II of this Consent Order from the effective date of this Consent Order to the date American submits a Response Action Outcome for RTN 3-18126, American shall pay Ten Thousand Dollars ($10,000) within thirty days of the Department's written notice thereof. American reserves any rights it may have to challenge, in any appropriate forum of competent jurisdiction, the factual or legal basis of the Department's claim for the suspended penalty.

Payment must be made by certified check, cashiers check or

money order made payable to the "Commonwealth of Massachusetts." The name "American Recycling of Massachusetts, Inc.," the file number ACOP NE-00-9013-123 and American's Federal Employer Identification Number, must be clearly written on the face of the check or money order. No other form of payment will be accepted. The payment must be directed to:

Commonwealth of Massachusetts
Master Lockbox
P.O. Box 3584
Boston, MA 02241-3584

In addition, a photocopy of the check or money order shall be sent to DEP at the Notice address herein, ATTN: Richard J. Chalpin.

E. In addition to payment of the administrative penalty American shall conduct the following activities by the deadlines established herein. The Department hereby determines and American hereby agrees that the deadlines set forth below constitute reasonable deadlines for performing the required activities:

M.G.L. c. 21C Corrective Action Letter Report

1. Within sixty (60) days of the effective date of this Consent Order, American shall submit a written plan ("Plan") to the Department for its review and comment setting forth how American will come into compliance with M.G.L. c. 21C and 310 CMR 30.000 et seq., and correct the violations summarized in Section II. D. 6 a.-j. of this Consent Order.

2. Within ninety (90) days of the effective date of this Consent Order, American shall correct the violations summarized in Section II. D. 6 a.-j. of this Consent Order and submit a letter report to the Department verifying that American has fully implemented its Plan and has corrected the violations summarized in Section II. D. 6 a.-j. of this Consent Order. The letter report shall include a description of the action American has taken to correct the violations, and the certification set forth in paragraph III. E. 15, below.

M.G.L. c. 21, §§ 26-53 Corrective Action Letter Report

3. Within thirty (30) days of the effective date of this Consent Order, American shall submit a written plan ("Plan") to the Department for its review and comment setting forth how American will comply with M.G.L. c. 21, §§ 26-53, how it decommissioned the floor drains, how it corrected the alleged violations summarized in Section II. D. 9 a.-b., and how it will correct the alleged violation summarized in Section II. D. 9 c. of this Consent Order. American's Plan shall provide for American's correction of said violations and shall include, without limitation, plans to:

   a. discontinue all the alleged unauthorized discharges from the baler/press room.

4. Within ninety (90) days of the effective date of this Consent Order, American shall correct the alleged violation summarized in Section II. D. 9 c. of this Consent Order and submit a letter to the Department verifying that it has corrected the alleged violation summarized in Section II. D. 9 c. of this Consent Order. The letter shall include a description of the action American has taken to correct the alleged violation and the certification set forth in paragraph III. E. 15, below.

Compliance with M.G.L. c. 21E

5. Within ninety (90) days of the effective date of this Consent Order, American shall submit an IRA Completion Report for RTN 3-18126.

6. Within ninety (90) days of the effective date of this Consent Order, American shall submit to the Department a written retraction of the RAO Opinion filed on August 24, 1999, for RTN 3-18431. Additionally, within ninety (90) days of the effective date of this Consent Order, American shall submit a revised Tier Classification Transmittal Form BWSC-107A to link both RTN 3-18126 and 3-18431. The revised Tier Classification must include the following:

   a. an evaluation of whether the combined Numerical Ranking System ("NRS") score for both releases would change the current Tier Classification, and

if so, American shall submit a revised NRS and Permit Application; and

b. as part of the NRS evaluation, it must be determined if the Natural Heritage and Endangered Species Program ("NHESP") Wetland Habitat boundaries are within 500 feet of the disposal site and if there are any wetlands within 100 feet of the disposal site, accounting for the fact that the extent of the disposal site goes beyond the current outlying sampling locations. This information shall be used when scoring Section V.A. Environmental Resource Areas of the NRS Scoresheet, and provided to the Department with the revised Tier Classification Form.

7. All MCP deadlines shall be based on the original Tier Classification date for RTN 3-18126 of April 7, 2000.

8. American shall submit a scope of work ("SOW") for a Phase II-Comprehensive Site Assessment for RTN 3-18126, in accordance with the MCP, on or before April 7, 2001. The Phase II Comprehensive Site Assessment SOW must also include, but not be limited to:

a. Assessment of the integrity and contents of the drainage pipe leading from the press room drain to the GLSD sewer line located in the central portion of the property;

b. Assessment of soil and groundwater along and immediately downgradient of the length of the above-referenced drainage pipe based upon the results of the assessment required in Section III. E. 8. a. of this Consent Order;

c. Assessment of the soils and ground water immediately adjacent to and downgradient of the press room floor;

d. Assessment of the surface soil located under the metal pile adjacent to the baler/press room upon which wastewater from the baler/press room was allegedly discharged. The soil shall be analyzed for chlorinated VOCs, PCBs, metals, VPH, and EPH;

and

e. Assessment of the source, extent, and migration pathways of contamination at the Site.

9. American shall submit a Phase II Report for RTN 3-18126 on or before April 7, 2002.

10. American shall submit, if applicable, a Phase III Remedial Action Plan for RTN 3-18126 on or before April 7, 2003. Additionally, American shall submit a Phase IV Remedy Implementation Plan for RTN 3-18126 on or before April 7, 2003.

11. American shall submit a Response Action Outcome Statement for RTN 3-18126 on or before April 7, 2005.

12. American shall continually assess release, threat of release and/or conditions at the Site in accordance with 310 CMR 40.0411 to determine whether an Immediate Response Action is required.

Independent Compliance Audit

13. Within thirty (30) days of the effective date of this Consent Order, American shall hire a qualified independent consulting agency to conduct an independent compliance audit ("Audit") of American's facility operations. The Audit shall provide for:

a. an objective evaluation of American's plans and procedures to ensure compliance with applicable federal, state and local environmental, health and safety laws and regulations;

b. recommendations for American's compliance with federal, state and local environmental, health and safety laws and regulations;

c. recommendations on ways for American to minimize waste production, storage, and disposal,

d. recommendations on ways for American to eliminate potential for releases of oil or hazardous material to the environment; and

e. recommendations for a contingency plan for addressing any future releases of oil and/or hazardous materials.

14. Within ninety (90) days of the effective date of this Consent Order, American shall submit the finalized audit report, prepared by a qualified independent consulting agency, to the Department. In addition, within 120 days of the effective date of the Consent Order, American shall submit a letter report verifying that it has implemented the recommendations made in the Audit. The letter report should include (i) a description of the actions American has taken to implement the recommendations; and (ii) the certification set forth in paragraph III. E. 15, below. If more than 120 days are needed to implement a particular recommendation made in the Audit, American shall notify the Department in writing before the 120 day period has passed, request an extension of time to implement the particular recommendation, and assume the burden of showing that additional time is reasonably necessary. Extensions to implement particular recommendations will be granted at the Department's discretion, if reasonably necessary. The extensions shall be made for a particular recommendation, and not for the entire letter report.

Certification

15. All certifications required by this Consent Order shall be as follows:

I, Peter F. Pons, President of American Recycling of Massachusetts, Inc. ("American") hereby attest under pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this letter report, (ii) that the information contained herein is, to the best of my knowledge and belief, true, accurate and complete and consistent with the Consent Order entered into by the Massachusetts Department of Environmental Protection and American on [insert effective date of consent order], and (iii) that I am fully authorized to make this certification on behalf of American. I am aware that there are significant penalties, including without limitation possible fines and imprisonment, for willfully submitting false, incomplete or inaccurate

information.

By: _____ Date: _____

IV. NOTICES AND SUBMITTALS

All notices, payments, certifications, submissions or other communications required or permitted to be made hereunder shall, unless otherwise indicated in this Consent Order, be made in writing and shall, unless otherwise indicated in this Consent Order, be sent by certified mail, return receipt requested, by hand delivery or by recognized overnight courier, as follows:

If to the Department, to:

Richard J. Chalpin, Regional Engineer
Department of Environmental Protection
205A Lowell Street
Wilmington, MA 01887

If to American, to:

Peter Prinz, President
American Recycling of Massachusetts, Inc.
207 Marston Street
Lawrence, MA 01841

Submittals will be considered delivered upon receipt by the Department.

V. WAIVER OF HEARING

American understands and hereby waives its right to an administrative hearing before the Department on, and judicial review by the courts of, the issuance or terms of this Consent Order. American also hereby waives notice of its right to an administrative hearing before the Department on, and judicial review by the courts of, the issuance or terms of this Consent Order. This waiver does not extend to any other order issued by the Department.

VI. RESERVATION OF RIGHTS

A. This Consent Order represents the full and final agreement between the Parties concerning the alleged violations in Section II.D. of this Consent Order. Notwithstanding the foregoing, the

Department expressly reserves, and this Consent Order is without prejudice to, the Commonwealth's and the Department's right and authority to issue any additional order and to bring any other claim, demand or other action which the Commonwealth or the Department may initiate, except for one to recover penalties for the alleged violations described in Section II. D. of this Consent Order. The Commonwealth's and Department's above-mentioned reservation of right and authority includes, but is not limited to the: (1) recovery of costs incurred by the Department in connection with response actions conducted at the subject Site or enforcement of this Consent Order; (2) recovery of damages to natural resources pursuant to M.G.L. c. 21E, § 5 or 42 U.S.C. 9601 et seq.; (3) recovery of damages to the Commonwealth's real or personal property pursuant to M.G.L. c. 21E, § 5; (4) enforcement of this Consent Order in any administrative or judicial proceeding;(5) enforcement of past or future noncompliance with any statute or regulation; and (6) prosecution of any civil and/or criminal action or proceeding in any state court.

B. Nothing in this Consent Order shall be construed or operate to bar, diminish, waive or in any way affect the Department's authority to perform response actions at the Site or to require Respondent to conduct response actions or take other actions beyond those required by this Consent Order in order to comply with all applicable laws and regulations including, without limitation, M.G.L. c. 21E and the MCP.

VII. CONSEQUENCES OF VIOLATION OF THE CONSENT ORDER

In addition to being a Consent Order, this is also a Notice of Noncompliance and an Assessment of Administrative Penalties issued to Respondent pursuant to M.G.L. c. 21A, § 16, and 310 CMR 5.00 for the violations referred to in Section II D. above. Future violations of those requirements or of this Consent Order may result, without limitation, in the assessment of additional civil administrative penalties for each day, or portion thereof, each such violation occurs or continues.

VIII. STIPULATED PENALTIES

A. If Respondent fails to comply with any of the terms or requirements of this Consent Order by failing to perform the activities within deadlines described in Section III of this Consent Order, Respondent agrees to pay to the Commonwealth a

stipulated penalty in the amount of $750.00 per violation for each day, or any portion thereof, each such violation continues.

B. All stipulated penalties accruing under this Consent Order shall be paid within thirty (30) calendar days of the date the Department sends a written claim therefor describing the violation. If a court judgment is necessary to execute a claim for stipulated penalties, Respondent agrees to assent to entry of such judgement; however, American reserves any rights it may have to challenge, in any appropriate forum of competent jurisdiction, the factual or legal basis of the Department's claim for stipulated penalties. Payment of such penalties shall be by certified check payable to the Commonwealth of Massachusetts. The name "American Recycling of Massachusetts, Inc.," the applicable Federal Employer Identification Number, and ACOP-NE-00-9013-123 shall be printed clearly on the face of the check. The check shall be mailed to: Commonwealth of Massachusetts, Department of Environmental Protection, P.O. Box 3584, Boston, Massachusetts, 02241-3584, with a copy to Richard J. Chalpin, Department of Environmental Protection, Northeast Regional Office, 205A Lowell Street, Wilmington, MA 01887. Payment of the penalty shall not alter any obligation to complete performance pursuant to this Consent Order. Payment of the penalty is necessary to return to compliance.

C. All stipulated penalties shall begin to accrue the day after any document or activity required by this Consent Order is due or the day a violation occurs and shall continue to accrue through the final day of the correction of the violation or completion of the activity. Separate penalties shall accrue for separate violations of this Consent Order.

D. The stipulated penalties set forth herein shall not preclude the Department from electing to pursue alternative remedies or alternative civil or criminal penalties which may be available by reason of Respondent's failure to comply with the requirements of this Consent Order. In the event the Department collects alternative civil administrative penalties, Respondent shall not be required to pay stipulated penalties pursuant to this Consent Order.

IX. MODIFICATION

This Consent Order may be modified only upon the written agreement of the Department and Respondent.

X. SEVERABILITY

If any term or provision of this Consent Order or the application thereof to any person or circumstance shall, to any extent, be invalid or unenforceable, the remainder of this Consent Order, or the application thereof, shall be valid and enforceable to the fullest extent permitted by law, provided, however, that in the event of such invalidity or unenforceability, the Department may in its sole discretion elect to void the entire Consent Order.

XI. EFFECTIVE DATE

This Consent Order shall become effective and shall be deemed to be consented to as of the date of the Department's signature set forth below. Each undersigned hereby certifies that he is fully authorized to enter into the terms and conditions of this Consent Order and to legally bind himself and/or the party on whose behalf such representative is signing.

American Recycling of Massachusetts, Inc. d/b/a Tombarello & Sons

By: _____
Peter Prinz, President
207 Marston Street
Lawrence, Massachusetts 01841
Telephone: 978-682-5226
Federal Employer Identification No.: 043444864

Date: 2/8/01

Department Of Environmental Protection

By: _____
William P. Gaughan, Regional Director
Metropolitan Boston/Northeast Regional Office
205A Lowell Street
Wilmington, Massachusetts 01887
Telephone (978) 661-7600

Date: 2/14/01

Attachment A

Pertinent sections of the Greater Lawrence Sewer District ("GLSD") rules and regulations as they apply to the Consent Order are as follows:

- Section 2.1(a) provides that no user shall discharge any liquid, solids or gases which by reason of their nature or quantity are, or may be, sufficient either alone or by interaction with other substances or cause fire explosion or be injurious in any other way to the POTW or to the operations of the POTW. At no time shall two successive readings on an explosion hazard meter at the point of the discharge into the system (or at any point in the system) be more than five percent (5%) nor any single reading over ten percent (10%) of the Lower Explosive Limit (LEL) of the meter. Prohibited materials include, but are not limited to, gasoline, kerosene, naphtha, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, and sulfides and any other substances which the District, the State or EPA has notified the User is a fire hazard to the system. In no case wastestreams with a closed cup flashpoint of less than one hundred and forty (140) degrees Fahrenheit (60 degrees C) using test methods specified in 40 CFR 261.21.

- Section 2.1 (b) provides that no user shall discharge solid or viscous substances which may cause obstruction to the flow in a sewer resulting in interference, such as, but not limited to: grease, garbage with particulates greater than on-half inch (1/2") in any dimension, animal guts or tissues, paunch manure, bones, hair, hides or fleshing, entrails, whole blood, feathers, ashes, cinders, sand, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags, spend grains, spent hops, wastepaper, wood, plastics, gas, tar, asp[halt residues, residues from refining or processing of fuel or fuel oil, mud, or glass grinding or polishing wastes.

- Section 2.1(d) provides that no user shall discharge any wastewater containing toxic pollutants in sufficient quantity, either singly or by interaction with any pollutants, to injure or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create a toxic effect in the receiving waters of

the POTW, or to exceed the limitation set forth in a National Pretreatment Standard.

- Section 2.1(f) provides that no user shall discharge any substance which may cause the POTW's effluent or any other product of the POTW such as residues, sludges, or scums, to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case, shall a substance discharged to the POTW cause the POTW to be in non-compliance with the sludge use or disposal criteria, guidelines or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Clean Air Act, or the State Criteria applicable to the sludge management method being used.

- Section 2.1(g) provides that no user shall discharge any substance, which will cause the POTW to violate its NPDES Permit or the receiving water quality standards.

- Section 2.1(m) provides that no user shall discharge any wastewater that causes a hazard to human life or creates a public nuisance.

- Section 2.1(n) provide that no user shall discharge any petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through or any substances which solidify or become viscous at temperatures between 32^0 F (0^0 C) and 140^0 F (60^0 C).

SCANNED

MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Waste Site Cleanup

NUMERICAL RANKING SYSTEM SCORESHEET

(310 CMR 40.1511)

CLASSIFICATION SUBMITTAL	
Initial Submittal	Re-Classification
☒	☐

DISPOSAL SITE SCORE					
II	III	IV	V	VI	TOTAL
185	107	20	20	0	332

Disposal Site Tier Classification	I			II
Permit Category (Tier I Only)	A	B	C	

****

I. DISPOSAL SITE INFORMATION

DEP Release Tracking Number(s)	3-18126
DEP Disposal Site Number(s)	

UTM Coordinates	N: 71° 08' 35"
	E: 42° 43' 09"

Disposal Site Name	J. Tombarello & Sons, Inc.
Disposal Site Address	207 Marston Street
	City: Lawrence Zip:01841

Is the Disposal Site classified Tier I because it is located within the boundaries of a Zone II or Interim Wellhead Protection Area and groundwater concentrations equal or exceed RCGW-1 at the time of Tier Classification pursuant to 310 CMR 40.0520(2)(a)1.?	Yes ☐	No ☒
Is the Disposal Site classified Tier I because an Imminent Hazard is present at the time of Tier Classification pursuant to 310 CMR 40.0520(2)(a)2.?	Yes ☐	No ☒

I attest under the pains and penalties of perjury that I have personally completed this Numerical Ranking System Scoresheet, and have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this submittal, and in my professional opinion and judgment based upon: (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, this Scoresheet was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000. 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.

Licensed Site Professional Signature	LSP Registration Number	Date
	9663	5 April 2000

LSP Name (Printed)	Company Name	Telephone Number
ELLIOT I. STEINBERG	Haley & Aldrich, Inc.	617-886-7454

American Recycling, Inc.

Responsible Party, Potentially Responsible Party, or Other Person who will provide certification in accordance with 310 CMR 40.0009.

COMMONWEALTH OF MASSACHUSETTS
ELLIOT
I.
STEINBERG
No. 9663
REGISTERED
LICENSED SITE PROFESSIONAL

II. EXPOSURE PATHWAYS

II.	EXPOSURE PATHWAYS			
Score according to 40.1512 - Exposure Pathway Designation Criteria				
MEDIA	*DESIGNATION*			
	NONE *or* NOT APPLICABLE	EVIDENCE OF CONTAMINATION	POTENTIAL EXPOSURE PATHWAY	LIKELY OR CONFIRMED EXPOSURE PATHWAY
A. SOIL (Includes Sediment)	0	15	(100)	150
B. GROUNDWATER	0	(20)	100	150
C. SURFACE WATER (Includes Wetlands)	(0)	20	100	150
D. AIR	0	(15)	100	200

Note: Score only the highest value for each media, i.e., score None or Not Applicable *or* Evidence of Contamination *or* Potential Exposure Pathway *or* Likely or Confirmed Exposure Pathway.

II. (A - D)	*Summary Rationale for Section II A - D Values and Phase I Report References*
A. OHM has been identified in soil at concentrations exceeding applicable RCs and staining is visible in certain locations on the soil's surface at the site. The property is surrounded by a fence, and infrared sensors are used to restrict access.	
B. OHM has been identified in groundwater at concentrations exceeding the applicable RCs; however, there are no exposure pathways.	
C. OHM has likely not attributed to contamination of any surface water since the closest body of water is approximately 2000 ft. away and the types and degree of contamination at the site are unlikely to migrate significantly.	
D. OHM has not been identified in air. It is not anticipated to be identified in air due to the low volatility of the compounds. However, the OHM is visible in certain locations on the soil's surface and there is a potential for the OHM to transfer into the air.	

II.E.	OHM SOURCES		
	1	2	≥ 3
Number of OHM Sources: Refuse metal recycling facility	0	25	(50)

SECTION II SCORE (A. + B. + C. + D. + E.)					
A.	B.	C.	D.	E.	TOTAL: (15 - 700)
100	20	0	15	50	185

Check here if Section VI has been used to amend the score for this Section of the NRS.	☐

III. DISPOSAL SITE CHARACTERISTICS

III.A.	OHM TOXICITY SCORE	
	Highest OHM Toxicity Score From Table III.A. or Worksheet III.A.1. on Following Pages.	
OHM Scored: Lead Concentration and Media: 4,170 µg/g in soil		Toxicity Score (1 - 80) 40

III.B.	MULTIPLE OHMs	
More Than One OHM With an OHM Toxicity Score of ≥ 30	No 0	Yes (30)

III.C.	OHM MOBILITY and PERSISTENCE	
	Score according to 40.1514 – OHM Mobility and Persistence	
OHM Scored: Lead: 4,170 µg/g in soil		Score (0 - 50) 25

III.D. DISPOSAL SITE HYDROGEOLOGY

Score according to 40.1515 - Soil Permeability

DEPTH TO GROUNDWATER (in feet)	SOIL PERMEABILITY		
	Low	Medium	High
> 25	2	4	8
10.1 - 25	4	8	12
5.1 - 10	8	(12)	16
0 - 5	12	16	20

SECTION III SCORE (A + B + C + D)

A.	B.	C.	D.	TOTAL: (3 - 180)
40	30	25	12	107

Check here if Section VI has been used to amend the score for this Section of the NRS. ☐

40.1511: continued

Table III.A.	OHM TOXICITY SCORE						
OHM	*CONCENTRATION* (soil/sediment: µg/g; surface/groundwater µg/l)						
	≤ 99	100 - 999	1,000 - 9,999	10,000 - 100,000	> 100,000 NAPL < 0.5"	NAPL 0.5" - 12"	NAPL > 12"
Aliphatics C5-C8	5	15	25	35	45	55	65
C9-C12	1	10	20	30	40	50	60
C9-C18	1	10	20	30	40	50	60
C19-C36	1	10	20	30	40	50	60
Arsenic	20	30	40	50	60		
Aromatics C9-C10	5	15	25	35	45	55	65
C11-C22	5	15	25	35	45	55	65
Benzene	15	25	35	45	55	65	75
Bis(2-ethylhexyl)phthalate	10	20	30	40	50	60	70
Cadmium	20	30	40	50	60		
Carbon Tetrachloride	20	30	40	50	60	70	80
Chlorobenzene	5	15	25	35	45	55	65
Chromium III	1	10	20	30	40		
Chromium VI	10	20	30	40	50		
Coal Tar	10	20	30	40	50	60	70
Cyanide	5	15	25	35	45		
1,1 Dichloroethane	10	20	30	40	50	60	70
1,2 Dichloroethane	10	20	30	40	50	60	70
Ethylbenzene	5	15	25	35	45	55	65
Ethylene Dibromide	20	30	40	50	60	70	80
#2 Fuel Oil (virgin product)	5	15	25	35	45	55	65
Gasoline (virgin product)	10	20	30	40	50	60	70
Lead	20	30	40	50	60		
Mercury	20	30	40	50	60	70	80
Methylene Chloride	10	20	30	40	50	60	70
Methyl Ethyl Ketone	1	10	20	30	40	50	60
Methyl *Tert* Butyl Ether	5	15	25	35	45	55	65
Nickel	5	15	25	35	45		

40.1511: continued

Table III.A. - continued	OHM TOXICITY SCORE						
OHM	*CONCENTRATION* (soil/sediment: µg/g, surface/groundwater µg/l)						
	≤ 99	100 - 999	1,000 - 9,999	10,000 - 100,000	> 100,000 NAPL < 0.5"	NAPL 0.5" - 12"	NAPL > 12"
Phenol	1	10	20	30	40	50	60
PAHs	10	20	30	40	50	60	70
PCBs	20	30	40	50	60	70	80
Tetrachloroethylene	10	20	30	40	50	60	70
Toluene	1	10	20	30	40	50	60
1,1,1 Trichloroethane	5	15	25	35	45	55	65
Trichloroethylene	15	25	35	45	55	65	75
Vinyl Chloride	15	25	35	45	55	65	75
Xylenes	1	10	20	30	40	50	60
Zinc	1	10	20	30	40		

Use Worksheet III.A.1. to determine the OHM Toxicity Score for OHM not listed in Table III.A.
See 40.1513 for Human Health-Based Toxicity Values for each OHM.

Worksheet III.A.1 **OHM TOXICITY SCORE**

HUMAN HEALTH-BASED TOXICITY VALUE	*CONCENTRATION* Use μg/g for Soil and μg/l for Surface Water and Groundwater						
	≤ 99	100 - 999	1,000 - 9,999	10,000 - 100,000	> 100,000 NAPL < 0.5"	NAPL 0.5" - 12"	NAPL > 12"
< 5	1	10	20	30	40	50	60
5 - 19	5	15	25	35	45	55	65
20 - 29	10	20	30	40	50	60	70
30 - 39	15	25	35	45	55	65	75
40 - 50	20	30	40	50	60	70	80

III.A.1. *OHM and Concentrations Used in Section III.A.1.*

OHM	Human Health-Based Toxicity Value	Concentration (Soil - μg/g)	Concentration (Water - μg/l)	**OHM Toxicity Score**
1,2,4-Trimethylbenzene (PAHs)		0.045		10
1,3,5-Trimethylbenzene (PAHs)		0.035		10
Acenaphthene	8	7.8		5
Anthracene	4	36		1
Barium	8	552		15
Benzo(a)pyrene	44	44		20
Benzo(b)fluoranthene	28	61		10
Benzo(g,h,i)perylene (PAHs)		69		10
Benzo(k)fluoranthene	28	53		10
Butlybenzylphthalate	20	0.372		10
Carbazole (PAHs)		16		10
Chrysene	28	84		10
Dibenzofuran	25	14		10
Fluoranthene	18	120		15
Fluorene	18	25.8		5
Indeno(1,2,3-cd)pyrene (PAHs)		52		10
Naphthalene	18	5.43		5
Phenanthrene	25	143		20

Pyrene	18	141		15
Selenium	25	0.32		10
Silver	25	20.8		10
Trichlorofluoromethane	4	2.7		1

III.C. *OHM and Concentrations Used in Section III.C.*

OHM	CONCENTRATION (Soil - μg/g)	OHM TOXICITY SCORE	**MOBILITY SCORE**
Arsenic	17.9	20	15
Benzo(a)pyrene	72	20	20
C9-C18 Aliphatics	2,400	20	20
C19-C36 Aromatics	23,800	30	20
Cadmium	8.21	20	15
Lead	4,170	40	25
Mercury	712	30	15
PCBs	92	20	20
Phenanthrene	143	20	15
TPH (#2 Fuel Oil)	9,090	25	10

40.1514(1) Users shall use the Mobility and Persistence Scores found in the following pages. If a OHM is not found in 310 CMR 40.1514(2) - Organic Compounds or 310 CMR 40.1514(3) - Metals, develop a Mobility and Persistence Score using 40.1514(4) - OHM Mobility and Persistence Factors.

40.1514(2) Mobility and Persistence Values and Scores: Organic OHMs

ORGANIC OHM	MOBILITY AND PERSISTENCE VALUES AND SCORES										TOTAL SCORE
	Solubility (mg/l)		Vapor Pressure (mm Hg)		K_{ow}		Degradation Potential [A]		Specific Gravity (at 20°) [B]		
	Value [ref.]	score	Value [ref.]	score	Value [ref.]	score	Value [ref.]	score	Value [ref.]	score	
Acenaphthene	3.4E+00 [2]	5	1.55E-03 [1(b)]	0	1.0E+04 [2]	5	N-P [8]	0	1.069 (95°/95°) [16]	10	20
Acetone	1.0E+06 [*]	10	2.70E+02 [1(f)]	10	5.8E-01 [1(f)]	10	N-P [15]	0	.791 [16]	0	30
Benzene	1.8E+03 [1(a)]	10	9.52E+01 [1(a)]	10	1.3E+02 [1(a)]	5	N-P [7]	0	.879 [16]	0	25
Benzo(a)pyrene	1.2E-03 [2]	0	5.60E-09 [1(a)]	0	1.2E+06 [2]	0	P [8,10]	10	1.35 (25°) [19]	10	20
Benzo(g,h,i)perylene	7.0E-04 [2]	0	1.03E-10 [1(a)]	0	3.2E+06 [2]	0	P [8,10]	10	NA	10	20
Benzoic Acid	2.7E+03 [2]	10	(0) [*]	0	7.4E+01 [2]	5	N-P [8]	0	1.316 (28°/4°) [16]	10	25
Bromodichloromethane	4.4E+03 [2]	10	1.5E+01	10	7.6E+01 [2]	5	P [7]	10	2.006 (15°/4°) [16]	10	45
Bromoform (Tribromomethane)	3.0E+03 [1(b)]	10	5.00E+00 [1(b)]	10	2.5E+02 [1(b)]	5	P [7]	10	2.903 (15°) [16]	10	45
Carbon Tetrachloride	7.6E+02 [1(a)]	5	9.00E+01 [1(a)]	10	4.4E+02 [1(a)]	5	P [7]	10	1.594 [16]	10	40
Chlorobenzene	4.7E+02 [1(a)]	5	1.17E+01 [1(a)]	10	6.9E+02 [1(a)]	5	N-P [7]	0	1.106 [16]	10	30
Chloroethane	5.7E+03 [2]	10	(34)	5	3.5E+01 [2]	5	N-P [12]	0	.903 [16]	0	20
Chloroform (Trichloromethane)	8.2E+03 [1(a)]	10	1.51E+02 [1(a)]	10	9.3E+01 [1(a)]	5	P [7]	10	1.49 (20°) [17]	10	45

ORGANIC OHM	MOBILITY AND PERSISTENCE VALUES AND SCORES										
	Solubility (mg/l)		Vapor Pressure (mm Hg)		K_{ow}		Degradation Potential [A]		Specific Gravity (at 20°) [B]		TOTAL SCORE
	Value [ref.]	score	Value [ref.]	score	Value [ref.]	score	Value [ref.]	score	Value [ref.]	score	
2-Chlorophenol	2.9E+04 [2]	10	(0.93)	0	1.5E+01 [2]	5	N-P [7]	0	1.241 (18.2°/15°) [16]	10	25
p-Dichlorobenzene(1,4)	7.9E+01 [2]	5	1.18E+00 [1(b)]	10	4.0E+03 [2]	5	P [7]	10	1.458 (21°) [16]	10	40
1,1-Dichloroethane	5.5E+03 [1(a)]	10	1.82E+02 [1(a)]	10	6.2E+01 [1(a)]	5	P [7]	10	1.176 [16]	10	45
1,2-Dichloroethane	8.5E+03 [1(a)]	10	6.40E+01 [1(a)]	10	3.0E+01 [1(a)]	5	P [7]	10	1.253 [16]	10	45
1,1-Dichloroethylene	2.3E+03 [1(a)]	10	6.00E+02 [1(a)]	10	6.9E+01 [1(a)]	5	P [7]	10	1.250 (15°) [16]	10	45
cis-1,2-Dichloroethylene	3.5E+03 [1(a)]	10	2.09E+02 [1(a)]	10	5.0E+00 [1(a)]	10	P [7]	10	1.27 (25°) [17]	10	50
trans-1,2-Dichloroethylene	6.3E+03 [1(a)]	10	3.24E+02 [1(a)]	10	3.0E+00 [1(a)]	10	P [7]	10	1.27 (25°) [17]	10	50
2,4-Dichlorophenoxyacetic Acid (2,4-D)	6.2E+02 [2]	5	4.00E-01 [1(c)]	5	6.5E+02 [2]	5	N-P [8]	0	1.255 [20]	10	25
Dimethyl Phthalate	4.3E+03 [2]	10	(0)	0	1.3E+02 [2]	5	N-P [11]	0	1.189 (25°/25°) [16]	10	25
2,6-Dinitrotoluene	1.3E+03 [2]	10	1.80E-02 [1(b)]	5	1.0E+02 [2]	5	P [8,11]	10	1.283 (111°) [16]	10	40
1,4-Dioxane	4.3E+05 [2]	10	3.99E+01 [1(d)]	10	1.0E+00 [2]	10	P [14]	10	1.034 [16]	10	50
Ethylbenzene	1.5E+02 [1(a)]	5	7.00E+00 [1(a)]	10	1.4E+03 [1(a)]	5	N-P [7]	0	.867 [16]	0	20
bis(2-Ethylhexyl)phthalate (DEHP)	2.9E-01 [2]	0	(0)	0	9.5E+03 [2]	5	P [8,11]	10	.9843 [16]	0	15
Fuel Oil (virgin product)											20

ORGANIC OHM	MOBILITY AND PERSISTENCE VALUES AND SCORES										
	Solubility (mg/l)		Vapor Pressure (mm Hg)		K_{ow}		Degradation Potential [A]		Specific Gravity (at 20°) [B]		TOTAL SCORE
	Value ref.	score	Value ref.	score	Value ref.	score	Value ref.	score	Value ref.	score	
Gasoline (virgin product)											25
Heptachlor	1.8E-01 [3]	0	3.00E-04 [1(b)]	0	2.5E+04 [2]	0	P [8]	10	1.57 [1(f)]	10	20
Hexachlorobenzene	6.0E-03 [1(a)]	0	1.09E-05 [1(a)]	0	1.7E+05 [1(a)]	0	P [7]	10	2.044 [16]	10	20
Hexachloroethane	5.0E+01 [2]	5	4.00E-01 [1(b)]	5	4.0E+04 [2]	0	N-P [8]	0	2.090 [20]	10	20
2-Hexanone	1.4E+04 [2]	10	(1.6)	0	2.5E+01 [3]	5	N-P [11]	0	.815 (18°/4°) [16]	0	15
Isophorone	1.2E+04 [2]	10	(0.3)	0	5.0E+01 [2]	5	N-P [11]	0	.921 (25°) [17]	0	15
Methylene Chloride	2.0E+04 [1(b)]	10	4.31E+03 [1(d)]	10	1.9E+01 [1(b)]	5	N-P [7]	0	1.366 [18]	10	35
Methyl Ethyl Ketone	2.7E+05 [1(a)]	10	7.75E+01 [1(b)]	10	1.8E+00 [1(a)]	10	N-P [15]	0	.805 [16]	0	30
Methyl Naphthalene	2.5E+01 [2]	5	(3.2)	0	1.3E+04 [2]	0	N-P [7]	0	1.025 (14°/4°) [16]	10	15
Methyl Tert-Butyl Ether	4.8E+00 [3]	5	(196)	10	NA	5	NA	0	.731 [16]	0	20
Naphthalene	3.2E+01 [2]	5	(20)	5	2.8E+03 [2]	5	N-P [7]	0	1.145 [16]	10	25
Nitrobenzene	1.9E+03 [2]	10	1.50E-01 [1(d)]	5	7.1E+01 [2]	5	N-P [8]	0	1.203 [16]	10	30
Pentachlorophenol	1.4E+01 [1(b)]	5	1.10E-04 [1(b)]	0	1.0E+05 [1(b)]	0	P [7]	10	1.978 (22°) [16]	10	25
Phenol	9.3E+04 [1(a)]	10	3.41E-01 [1(a)]	5	2.9E+01 [1(a)]	5	N-P [7]	0	1.071 (25°/4°) [16]	10	30
PCBs	1.2E-02 [2]	0	7.70E-05 [1(b)]	0	1.1E+06 [2]	0	P [8,9]	10	1.5 (25°) [18]	10	20
1,1,2,2-Tetrachloroethane	2.9E+03 [2]	10	5.00E+00 [1(a)]	10	2.5E+02 [2]	5	P [8,11]	10	1.600 [16]	10	45

ORGANIC OHM	MOBILITY AND PERSISTENCE VALUES AND SCORES										
	Solubility (mg/l)		Vapor Pressure (mm Hg)		K_{ow}		Degradation Potential [A]		Specific Gravity (at 20°) [B]		TOTAL SCORE
	Value	ref. / score	Value	ref. / score	Value	ref. / score	Value	ref. / score	Value	ref. / score	
Tetrachloroethylene	1.5E+02	1(a) / 5	1.8E+01	1(a) / 10	4.0E+02	1(a) / 5	P	7 / 10	1.631 (15°/4°)	16 / 10	40
Tetrahydrofuran	3.0E-01	4 / 0	(2)	/ 0	6.6E+00	6 / 10	N-P	13 / 0	.888 (21°/4°)	16 / 0	10
Toluene	5.3E+02	1(a) / 5	2.81E+01	1(a) / 10	5.4E+02	1(a) / 5	N-P	7 / 0	.866	16 / 0	20
1,2,4-Trichlorobenzene	3.0E+01	1(a) / 5	2.90E-01	1(b) / 5	2.0E+04	2 / 0	P	8 / 10	1.446 (26°)	16 / 10	30
1,1,1-Trichloroethane	1.5E+03	1(a) / 10	1.23E+02	1(a) / 10	3.2E+02	1(b) / 5	P	7 / 10	1.346 (15°/4°)	16 / 10	45
1,1,2-Trichloroethane	4.5E+03	1(a) / 10	3.00E+01	1(a) / 10	3.0E+02	1(a) / 5	P	7 / 10	1.441 (25.5°/4°)	16 / 10	45
Trichloroethylene (TCE)	1.1E+03	1(a) / 10	5.79E+01	1(a) / 10	2.4E+02	1(a) / 5	P	7 / 10	1.466 (20°/20°)	16 / 10	45
2,4,6-Trichlorophenol	8.0E+02	2 / 5	1.20E-02	1(a) / 5	7.4E+03	2 / 5	N-P	8 / 0	1.490 (75°/4°)	16 / 10	25
Vinyl Chloride	2.7E+0	1(a) / 5	2.66E+03	1(a) / 10	2.4E+01	1(a) / 5	P	7 / 10	.908 (25°/25°)	16 / 0	30
Xylenes	2.0E+02	1(a) / 5	1.00E+01	1(a) / 10	8.9E+02	1(a) / 5	N-P	7 / 0	.880	16 / 0	20

NOTES

[A] Degradation Potential: N-P = Non-Persistent; P = Persistent. Score for "N-P" = 0; "P" = 10.
[B] Specific gravity of compound at 20°C referred to water at 4°C (20°/4°) unless otherwise specified.
[C] Numbers in parentheses are Henry's Law Constant in atm m^3 water/m^3 air.

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* Solubility of 1,000,000 mg/l assigned because of reported "infinite solubility" in the literature.

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19 US Public Health Service, Agency for Toxic Substances and Disease Registry, "Draft Toxicological Profile for Benzo(a)pyrene," October 1987.
20 Merck Index, 9th edition, Merck and Co. Inc., New Jersey, 1976.

40.1514(3) Metals

METAL	Mobility	Score
Arsenic - H_2AsO_4	Slowly mobile	15
Asbestos - > 2μ	Immobile	5
Asbestos - < 2μ	Slowly mobile	15
Beryllium - Be^{++}	Moderately mobile	25
Cadmium - Cd^{++}	Slowly mobile	15
Chromium - Cr^{+++} or Cr^{+6}	Slowly mobile	15
Copper - Cu^{++}	Moderately mobile	25
Cyanide - CN^-	Relatively mobile	35
Lead - Pb^{++}	Moderately mobile	25
Mercury - Hg^{++}	Slowly mobile	15
Selenium - $HSeO_4^-$ & SeO_3^{--}	Relatively mobile	35
Zinc - Zn^{++}	Moderately mobile	25

[1] Fuller, "Movement of Selected Metals, Asbestos, and Cyanide in Soils: Application to Waste Disposal Problems," EPA-600/2-77-020, April 1977.

40.1514(4) OHM Mobility and Persistence Factors for Other Organic Compounds

OHM MOBILITY AND PERSISTENCE FACTORS Organic Compounds						
FACTOR	*RANGE and VALUE*					
	LOW	(Value)	MEDIUM	(Value)	HIGH	(Value)
Solubility (mg/L)	< 1	(0)	1 - 1,000	(5)	> 1,000	(10)
Vapor Pressure (mm Hg)	< 0.01	(0)	0.01 - 1	(5)	> 1	(10)
K_{oc}	> 10,000	(0)	10 - 10,000	(5)	< 10	(10)
Degradation Potential	Non-Persistent (NP)	(0)			Persistent (P)	(10)
Specific Gravity (20° C)	< 1	(0)			> 1	(10)
Radionuclides **Radionuclides present in quantities greater than their federal Reportable Quantity (40 CFR Part 302.4, Appendix B) where the quantity is known or in concentrations greater than background where the quantity is not known shall be assigned a *Mobility and Persistence Score* equal to 40.**						

40.1515 Soil Permeability Criteria

SOIL PERMEABILITY	
VALUES	*CRITERIA*
LOW	Permeability: < 10E-7 cm/s Soil or Bedrock Type: clay; shale; compact till; unfractured metamorphic and igneous rocks.
MEDIUM	Permeability: 10E-7 to < 10E-3 cm/s Soil or Bedrock Type: silt, fine sand and silty sand; loess; silty clays; clay loams, silty loams, sandy loams, and loamy sands; less to moderately permeable limestones, dolomites, and sandstone; moderately permeable to coarse till; moderately fractured igneous and metamorphic rocks. Fill is considered moderately permeable unless disposal site-specific condition indicate otherwise.
HIGH	Permeability: ≥ 10E-3 cm/s Soil or Bedrock Type: gravel, sand; highly fractured igneous and metamorphic rocks; permeable basalt and lavas; karst limestone and dolomite.

IV. HUMAN POPULATION AND LAND USES

IV.A.	HUMAN POPULATION			
Residential Population Within ½ Mile	None 0	1 - 99 5	100 – 999 10	≥ 1,000 (15)
Institutions Within 500 feet	None (0)		One or More 10	
On-Site Workers	None 0	1 - 99 (5)	100 – 999 10	≥ 1,000 15

IV.B.	AQUIFERS	
Sole Source Aquifer Name: _____	No (0)	Yes 25
Potentially Productive Aquifer	No (0)	Medium or High 15

IV.C.	WATER USE				
Proximity of Disposal Site to Public Drinking Water Supply Source	Not Applicable (NA) (0)			Zone A 20	Zone II, IWPA, or SW Intake ≤ 400' 50
Persons Served by Public Drinking Water Supply	NA (0)	25 - 999 5	1,000 - 4,999 10	5,000 - 49,999 20	≥ 50,000 25
Private Water Supplies Within 500 Feet	None (0)		Commercial Industrial 10	Agriculture Residential (Not Ingested) 15	Drinking Food Processing 25
Alternative Public Water Supply Available (Viable Public Water Supply in Disposal Site Community *and* Public Water Connection ≤ 500 Feet from Site)	Yes (0)		No 25		

SECTION IV SCORE (A + B + C)			
A. 20	B. 0	C. 0	TOTAL: (0 - 205) 20

Check here if Section VI has been used to amend the score for this Section of the NRS.	☐

40.1511 (Continued)

V. ECOLOGICAL POPULATION

V.A.	ENVIRONMENTAL RESOURCE AREAS		
RESOURCE	*LOCATION*		
Area of Critical Environmental Concern	> 500' from Site (0)	≤ 500' from Site 20	On-Site 30
Species of Special Concern, Threatened or Endangered Species Habitat	> 500' from Site (0)	On-Site or ≤ 500' from Habitat 30	
Wetlands, Certified Vernal Pool, or Outstanding Resource Water	> 100' from Site (0)	≤ 100' from Site 20	On-Site 30
Fish Habitat	> 500' from Site (0)	≤ 500' from Site 20	On-Site 30
Protected Open Space (Local/State/Federal/Trustee)	> 500' from Site 0	≤ 500' from Site (20)	On-Site 30

SCORE SECTION V.B. *ONLY* IF SECTION V.A. SCORE IS ≥ 30.

V.B.	ENVIRONMENTAL TOXICITY SCORE *Highest Environmental Toxicity Score From Table V.B. or Worksheet V.B.1. on Following Pages.*	
OHM Scored: _____ Concentration and Media: _____		Toxicity Score (1 – 35) 0

SECTION V. SCORE (A. + B.)		
A. 20	B. 0	TOTAL: (0 - 185) 20

Check here if Section VI has been used to amend the score for this Section of the NRS.	☐

40.1511 (Continued)

Table V.B.	ENVIRONMENTAL TOXICITY SCORE				
OHM	*CONCENTRATION* (soil/sediment: µg/g; surface/groundwater µg/l)				
	< 1	1 - 99	100 - 999	1,000 - 9,999	≥ 10,000
Arsenic	5	10	15	20	25
Benzene	0	1	5	10	15
Bis(2-ethylhexyl)phthalate *	5	10	15	20	25
Cadmium	10	15	20	25	30
Carbon Tetrachloride	0	1	5	10	15
Chlorobenzene *	5	10	15	20	25
Chromium III	1	5	10	15	20
Chromium VI	5	10	15	20	25
Coal Tar *	5	10	15	20	25
Cyanide	5	10	15	20	25
1,1 Dichloroethane *	5	10	15	20	25
1,2 Dichloroethane	0	1	5	10	15
Ethylbenzene	0	1	5	10	15
Ethylene Dibromide *	5	10	15	20	25
#2 Fuel Oil (virgin product) *	1	5	10	15	20
Gasoline (virgin product) *	5	10	15	20	25
Lead	5	10	15	20	25
Mercury	15	20	25	30	35
Methylene Chloride *	5	10	15	20	25
Methyl Ethyl Ketone *	5	10	15	20	25
Methyl Tert Butyl Ether *	1	5	10	15	20
Nickel	1	5	10	15	20
Phenol	0	1	5	10	15
PAHs *	5	10	15	20	25
PCBs	15	20	25	30	35
Tetrachloroethylene	0	1	5	10	15
Toluene	0	1	5	10	15
1,1,1 Trichloroethane	0	1	5	10	15
Trichloroethylene	0	1	5	10	15

Table V.B.	ENVIRONMENTAL TOXICITY SCORE				
OHM	*CONCENTRATION* (soil/sediment: μg/g; surface/groundwater μg/l)				
	< 1	1 - 99	100 - 999	1,000 - 9,999	≥ 10,000
Vinyl Chloride *	5	10	15	20	25
Xylenes *	5	10	15	20	25
Zinc	1	5	10	15	20

* Scores derived by default methods 40.1516(2).

40.1511 (Continued)

Use Worksheet V.B.1. to determine Environmental Toxicity Scores for OHM not listed in Table V.B.
See 40.1516 for Environmental Toxicity Values for each OHM.

Worksheet V.B.1	**ENVIRONMENTAL TOXICITY SCORE**				
ENVIRONMENTAL TOXICITY VALUE	*CONCENTRATION* Use μg/g for Soil and μg/l for Surface Water or Groundwater				
	< 1	1 - 99	100 - 999	1,000 - 9,900	≥ 10,000
10	0	1	5	10	15
20	1	5	10	15	20
30	5	10	15	20	25
40	10	15	20	25	30
50	15	20	25	30	35

V.B.1.	*OHM and Concentrations Used in Section V.B.1.*			
OHM	Environmental Toxicity Value	Concentration (Soil - μg/g)	Concentration (Water - μg/l)	**Environmental Toxicity Score**

VI. MITIGATING DISPOSAL SITE-SPECIFIC CONDITIONS

VI.	MITIGATING DISPOSAL SITE-SPECIFIC CONDITIONS
Disposal site-specific conditions that warrant amending the site score. Changes directly related to NRS Sections or Subsection scores may not reduce the score more than the relevant subsection value assigned for the disposal site in that subsection. Section VI must reference specific pages of the Phase I. Section VI may not exceed ± 50 Points and may be scored only in 5-point increments. Attach additional pages as necessary.	
Disposal Site Score Amendment (Not to Exceed ± 50 Points)	Score ______

Former Tombarello and Sons Property
207 Marston Street
Lawrence, MA
RTN: 3-18126

MassDEP Contact:

Ms. Valerie Thompson
Environmental Analyst
Bureau of Waste Site Cleanup
MassDEP Northeast Regional Office
205B Lowell Street
Wilmington, MA 01887
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US EPA Contact:

Mr. Michael Barry
Emergency Response Team Lead
On-Scene Coordinator
US EPA New England – Region 1
One Congress Street
Boston, MA 02114
Office: 617-918-1344
Cell: 617-257-2251

Dave McIntyre
617 918 1281

Tues-Fri - Annual leave

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FIGURE 1
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
HOFMANN AVE

1" 1/2" 0" 1"

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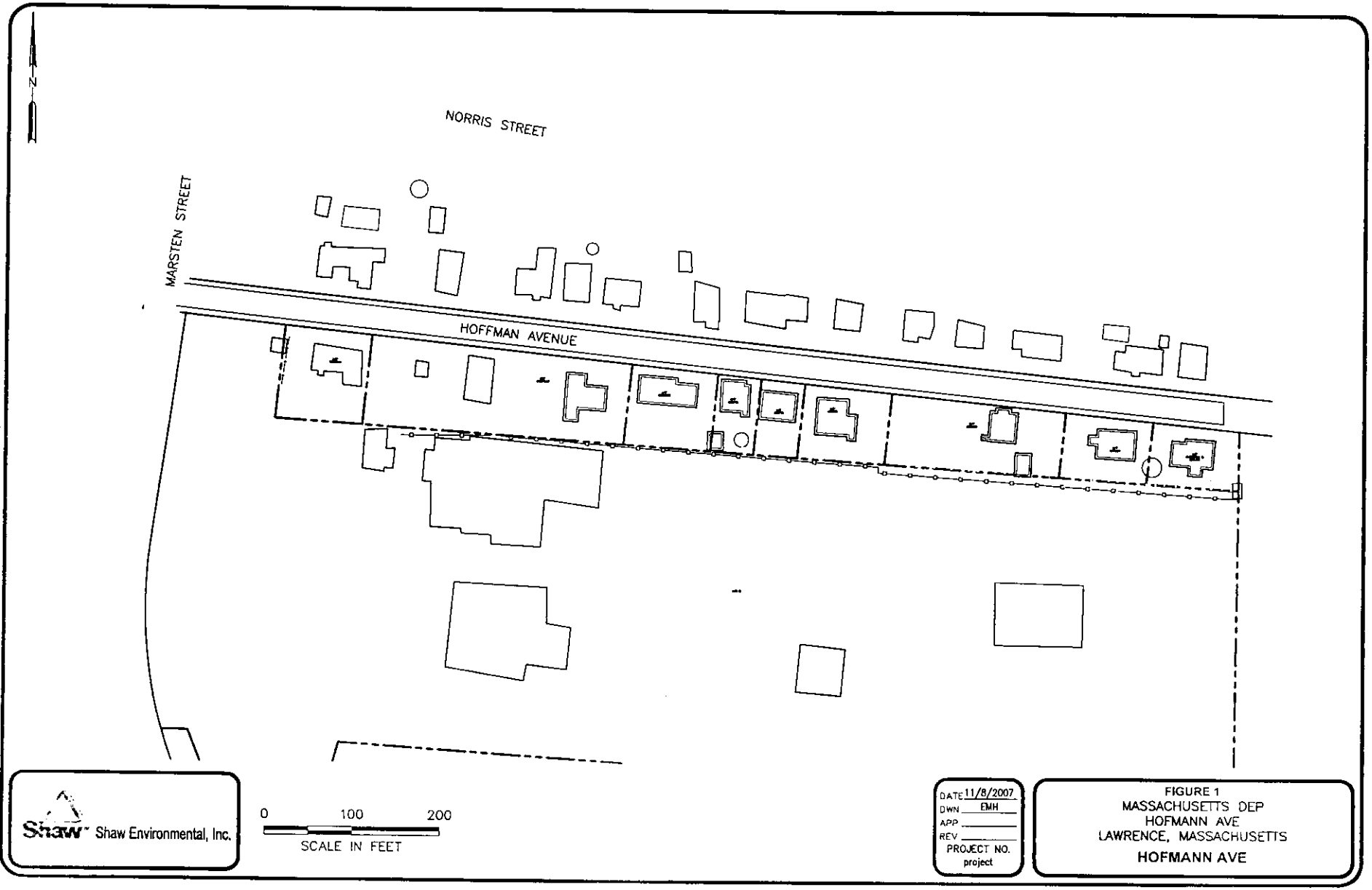
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NORRIS STREET
MARSTEN STREET
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SCALE IN FEET
Shaw Environmental, Inc.
DATE 11/8/2007
DWN EMH
APP
REV
PROJECT NO.
project
FIGURE 1
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
HOFMANN AVE
1" 1/2" 0" 1"
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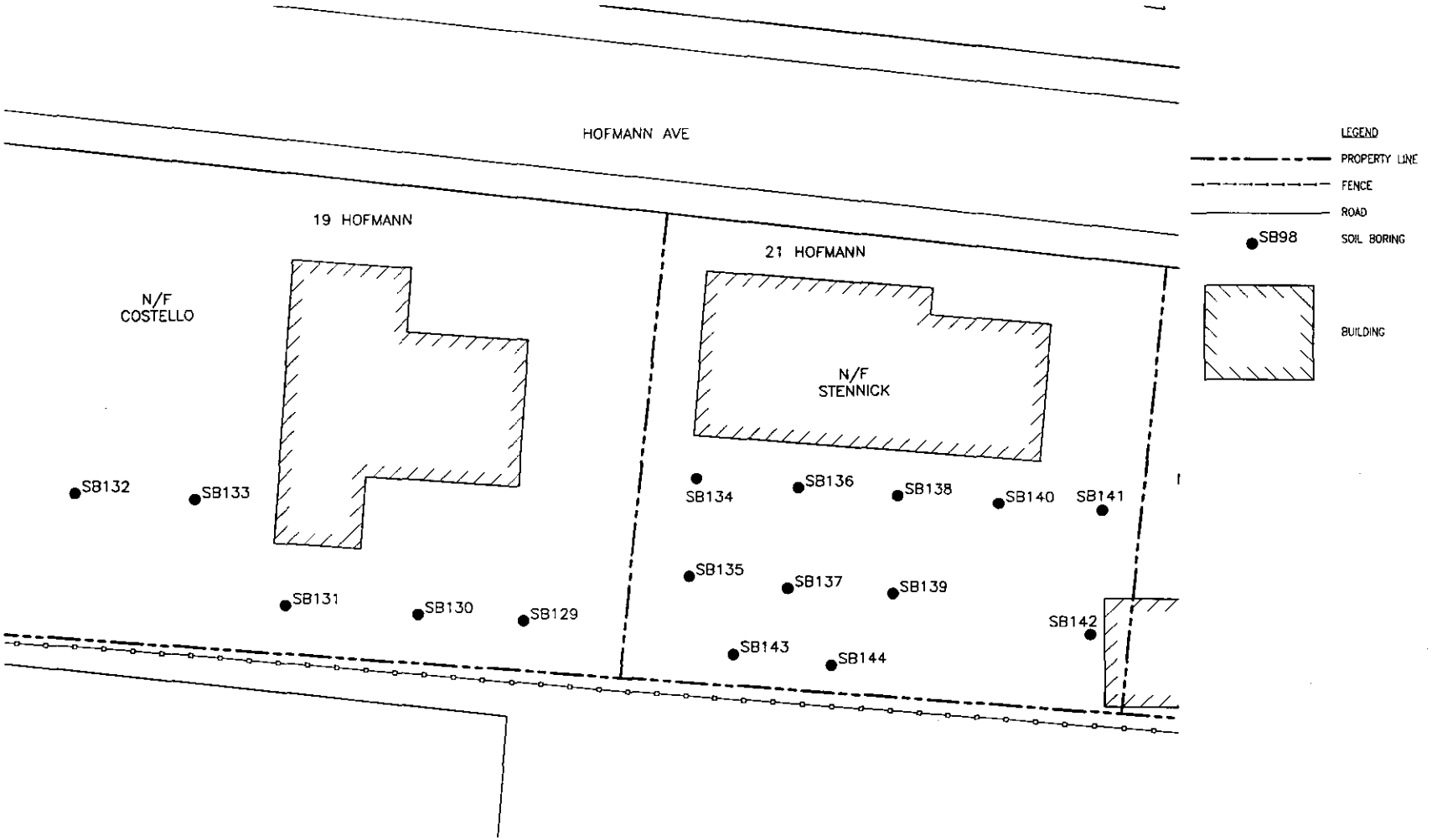

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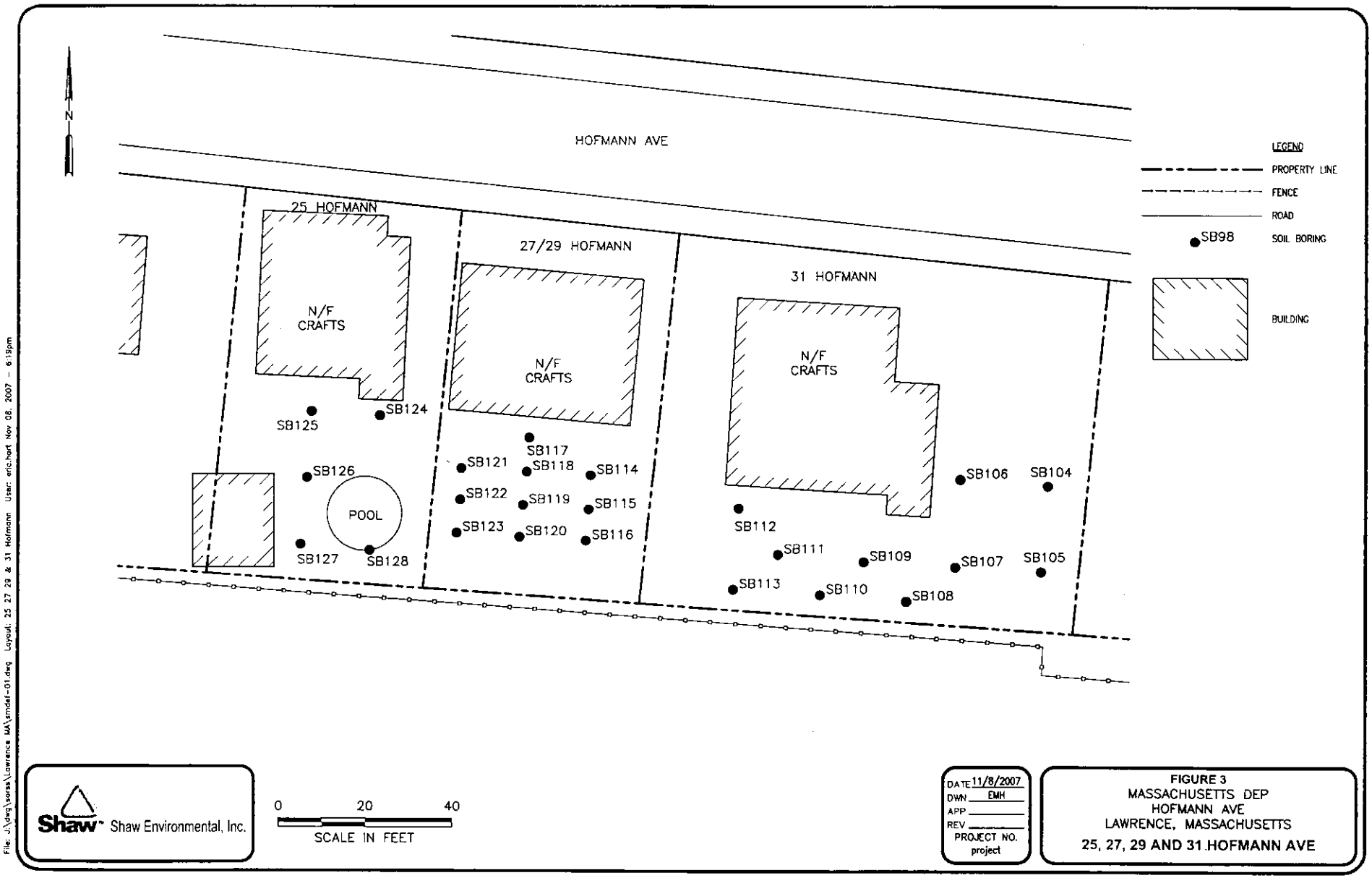
PROJECT NO.
project

FIGURE 2
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
19 AND 21 HOFMANN AVE

1" 1/2" 0" 1"

File: J:\dwg\sarss\Lawrence MA\smdef-01.dwg Layout: 19 & 21 Hofmann User: eric.hart Nov 08, 2007 - 6:18pm



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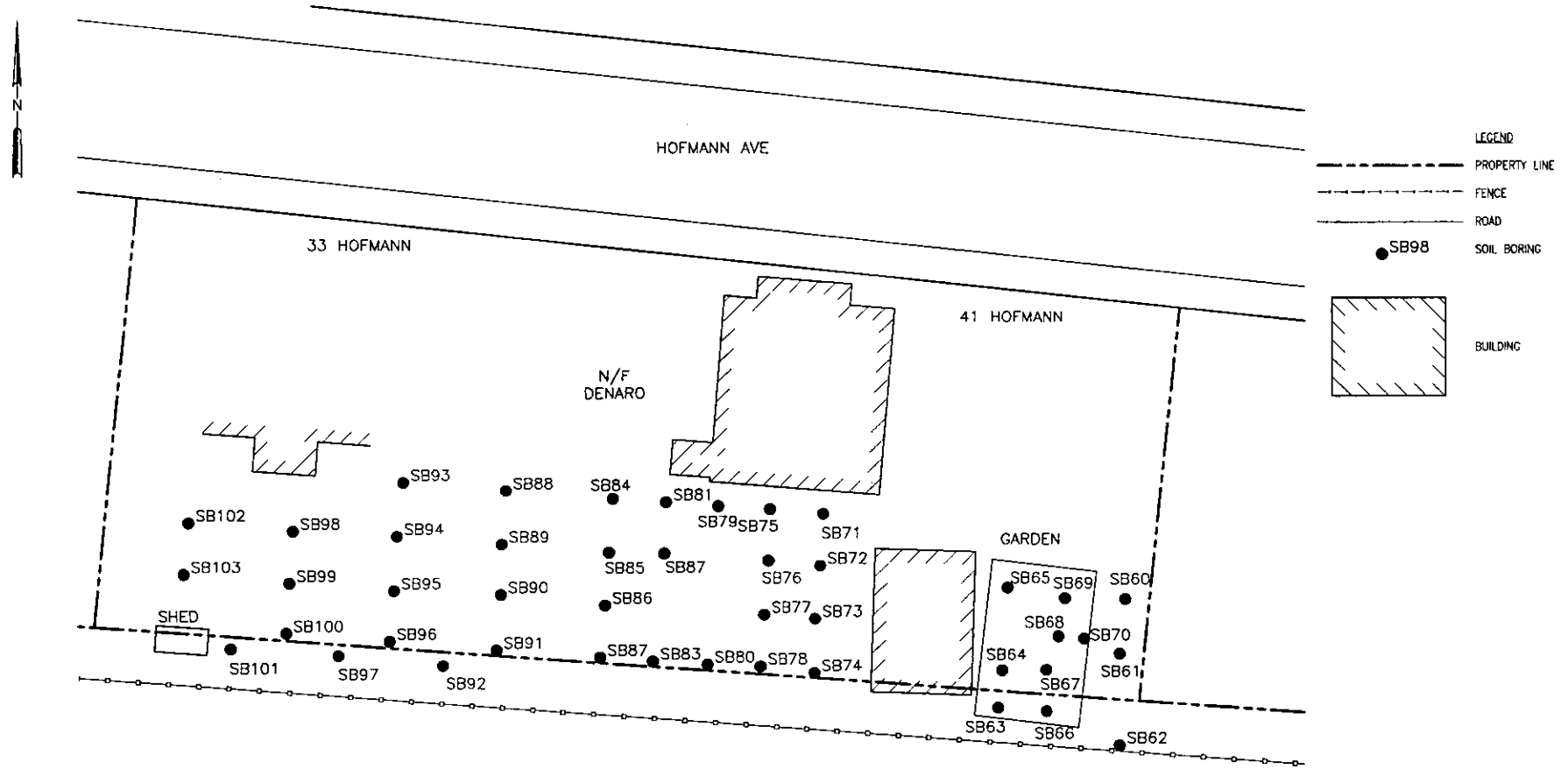
1" 1/2" 0" 1"



Shaw™ Shaw Environmental, Inc.

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DATE 11/12/07
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APP
REV
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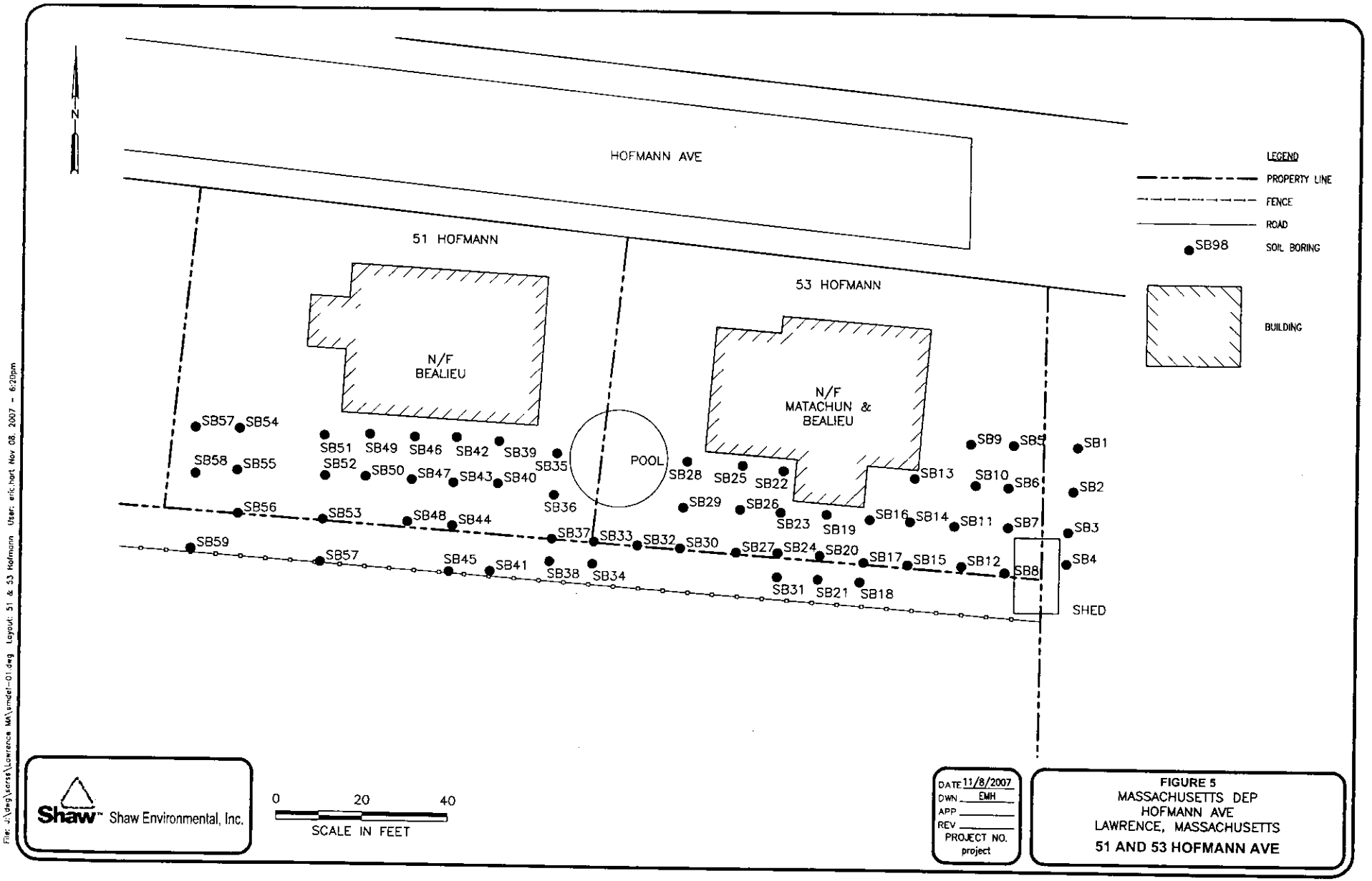
FIGURE 4
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
33 AND 41 HOFMANN AVE

1" 1/2" 0" 1"

File: J:\dwg\sorsa\Lawrence MA\smdef-01.dwg Layout: 33 & 41 Hofmann User: eric.hart Nov 12, 2007 - 2:03pm


N
HOFMANN AVE
51 HOFMANN
53 HOFMANN
N/F
BEALIEU
N/F
MATACHUN &
BEALIEU
POOL
SHED
LEGEND
PROPERTY LINE
FENCE
ROAD
SB98
SOIL BORING
BUILDING
SB57 SB54
SB58 SB55
SB56
SB59
SB51 SB49 SB46 SB42 SB39 SB35
SB52 SB50 SB47 SB43 SB40 SB36
SB53 SB48 SB44
SB57 SB45 SB41 SB38 SB34
SB37 SB33 SB32 SB30
SB28 SB25 SB22
SB29 SB26 SB23
SB27 SB24 SB20 SB19
SB31 SB21 SB18
SB13
SB9 SB5
SB10 SB6
SB16 SB14 SB11 SB7
SB17 SB15 SB12 SB8
SB1
SB2
SB3
SB4
Shaw Shaw Environmental, Inc.
0 20 40
SCALE IN FEET
DATE 11/8/2007
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PROJECT NO.
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FIGURE 5
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
51 AND 53 HOFMANN AVE
1" 1/2" 0" 1"
File: J:\dwg\sarse\Lawrence MA\smdel-01.dwg Layout: 51 & 53 Hofmann User: eric.hart Nov 08, 2007 - 6:20pm

#19 Hofmann Avenue Soil Sampling Data (mg/kg) 10/5/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-129	.80	31	140	1.7	**40**	.25	170	.70	.51
SB-130	.49	11	110	1.4	27	2.7	170	.70	.31
SB-131	.64	11	90	1.4	28	.30	210	.75	.36
SB-132	1.3	9.9	68	1.1	24	.30	220	.75	.33
SB-133	.19	11	37	1.1	**37**	.26	88	.70	.17
Total	3.42	73.9	445	6.7	156	3.81	858	3.6	1.68
EPC	.68	14.8	89	1.34	**31.2**	.76	171.6	.72	.34
S-1	2.0	20	1000	2.0	**30**	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#21 Hofmann Avenue Soil Sampling Data (mg/kg) 10/5/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-134	1.2	9.3	50	.85	21	.27	91	.75	.30
SB-135	1.5	12	77	1.3	27	1.8	230	.75	.37
SB-136	1.6	11	50	.95	21	.27	130	.70	.35
SB-137	1.9	12	62	1.0	23	.26	150	.70	.36
SB-138	.92	19	44	.98	22	.25	91	.70	.26
SB-139	.38	10	50	.96	25	.27	83	.70	.20
SB-140	.95	16	52	.88	**34**	.29	79	.75	.14
SB-141	1.4	12	50	.98	25	.29	100	.70	.24
SB-142	3.8	13	71	1.5	23	.27	**320**	.70	.90
SB-143	**2.4**	9.2	75	**2.3**	27	.27	180	.70	.44
SB-144	4.1	11	76	**2.2**	26	.27	220	.70	.43
Total	20.15	134.5	657	13.9	274	4.51	1524	7.85	3.99
EPC	1.83	12.2	59.7	1.26	24.91	.41	138.5	.71	.36
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#25 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-124	.97	12	56	.72	22	.25	120	.70	.22
SB-125	.92	12	120	1.8	30	.25	**380**	.60	.38
SB-126	1.5	14	240	**3.5**	24	.27	**600**	.70	.43
SB-127	.96	13	97	1.5	27	.29	160	.75	.46
SB-128	.71	12	100	1.6	27	.27	240	.70	.43
Total	5.06	63	613	9.12	130	1.33	1500	3.45	2.06
EPC	1.01	12.6	122.6	1.8	26	.27	300	.69	.41
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#27/29 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-114	.29	12	64	1.2	24	.25	130	.60	.22
SB-115	.25	10	44	.96	28	.25	71	.70	.21
SB-116	.71	20	79	1.1	24	.25	150	.70	.40
SB-117	.11	6.7	32	.58	19	.25	35	.70	.079
SB-118	.19	10	43	.70	23	.27	77	.70	.16
SB-119	.22	8.5	42	.61	20	.25	83	.70	.23
SB-120	.39	15	45	.65	20	.27	78	.70	.25
SB-121	.34	15	52	.80	29	.25	81	.70	.14
SB-122	.43	21	42	.93	**34**	.27	70	.70	.22
SB-123	.64	17	51	.78	24	.25	110	.70	.27
Total	3.57	125.2	494	8.31	245	2.56	885	6.9	2.18
EPC	.36	12.5	49.4	.83	24.5	.26	88.5	.69	.22
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#31 Hofmann Avenue Soil Sampling Data 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-104	.57	7.7	53	.77	26	.27	100	.70	.20
SB-105	1.7	15	81	1.5	28	.26	210	.70	.40
SB-106	.71	8.6	66	.98	24	.26	170	.70	.32
SB-107	2.0	12	79	1.4	31	.26	220	.70	.34
SB-108	.80	9.9	60	1.0	26	.25	180	.60	.32
SB-109	.37	9.7	82	.80	24	.27	170	.70	.18
SB-110	3.0	11	81	1.7	31	.25	220	.60	.40
SB-111	.19	8.0	49	.58	24	.25	73	.70	.10
SB-112	.27	7.6	43	.78	25	.27	72	.70	.15
SB-113	1.2	9.7	62	1.1	26	.26	170	.70	.54
Total	9.81	99.2	656	10.61	265	2.6	1755	6.8	2.95
EPC	.98	9.92	65.6	1.06	26.5	.26	175.5	.68	.30
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#33 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-84	.69	9.0	160	1.7	20	.26	290	.76	.33
SB-85	.57	11	95	0.93	24	.35	230	.75	.30
SB-86	.33	9.4	82	.82	23	.28	180	1.4	.19
SB-87	.60	9.9	91	.97	27	.28	260	.70	.25
SB-88	.54	10	120	1.1	28	.33	280	.53	.75
SB-89	.063	6.9	45	.31	32	.28	53	.72	.071
SB-90	.46	11	83	.85	23	.27	230	.72	.41
SB-91	.009	7.4	45	.29	26	.27	42	.72	.056
SB-92	1.0	9.5	83	.98	22	.27	230	.72	.27
SB-93	.025	7.1	43	.27	24	.24	35	.51	.049
SB-94	.009	6.9	45	.28	25	.26	50	.72	.075
SB-95	.16	10	64	.26	24	.24	100	.72	.11
SB-96	.77	9.9	100	1.1	23	.24	260	.75	.26
SB-97	.009	7.3	43	.26	27	.26	31	.70	.068
SB-98	.092	8.7	66	.72	23	.27	200	.72	.17
SB-99	.012	6.9	48	.34	26	.27	33	.70	.077
SB-100	.087	6.6	53	.37	20	.25	68	.70	.093
SB-101	.019	6.8	48	.40	25	.23	55	.60	.074
SB-102	.14	9.7	67	.65	30	.27	120	.70	.18
SB-103	.009	6.9	44	.31	27	.25	50	.70	.077
Total	5.6	161	1425	12.91	499	5.37	3329	14.54	3.86
EPC	.28	8.05	71.25	0.65	24.95	.27	166	.73	.19
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#41Hofmann Avenue Soil Sampling Data (mg/kg) 10/3/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-71	1.5	8.9	100	1.5	22	0.19	**470**	0.15	1.3
SB-72	**3.4**	14	120	1.8	26	0.16	**530**	1.8	0.63
SB-73	**4.4**	12	250	6.0	**31**	0.29	**510**	1.2	0.71
SB-74	1.5	**20**	**1400**	**30**	**71**	0.53	**1300**	0.7	1.0
SB-75	1.2	9.0	110	1.6	24	0.6	**510**	0.68	0.52
SB-76	**4.2**	**57**	200	3.4	27	0.36	**1000**	1.1	0.89
SB-77	**4.6**	12	140	2.5	**33**	0.26	**510**	0.68	0.58
SB-78	1.3	17	330	6.1	27	0.11	**300**	0.84	0.44
SB-79	.78	10	130	1.7	19	0.21	**1000**	0.48	0.46
SB-80	**2.6**	17	200	3.7	28	0.29	**560**	0.7	0.52
SB-81	.40	11	100	1.2	24	0.29	**400**	0.7	0.46
SB-82	.32	11	52	0.48	20	0.24	110	0.6	0.16
SB-83	.58	17	290	**2.5**	27	0.24	220	0.6	1.6
Total	26.8	216	3422	62.5	379	3.77	7420	10.23	9.27
EPC	**2.1**	16.6	263	**4.8**	29.2	0.3	**571**	0.79	0.7
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#51Hofmann Avenue Soil Sampling Data (mg/kg)10/2/07 (0-6")									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-32	**2.0**	14	68	1.6	21	0.15	140	0.40	0.35
SB-33	**3.4**	11	56	1.7	21	0.05	130	0.41	0.36
SB-34	1.2	11	270	**15**	28	0.31	**340**	1.6	0.52
SB-36	1.6	12	54	0.99	19	0.05	110	0.38	0.36
SB-38	1.9	17	280	**13**	27	0.14	290	1.1	0.72
SB-39	1.1	9.7	51	0.89	26	0.11	91	0.13	0.66
SB-40	1.6	10	49	0.92	17	0.05	92	0.34	0.26
SB-41	**22.0**	14	180	**3.6**	**47**	0.24	**300**	0.30	0.71
SB-41 (6-12")	**5.1**	8.6	65	1.3	18	.55	76	.44	.31
SB-42	1.0	9.5	57	0.95	23	0.21	100	0.7	0.05
SB-43	1.9	13	65	1.3	24	0.24	130	0.75	0.31
SB-44	3.3	14	77	1.6	26	0.26	170	0.7	0.33
SB-45	**10.0**	**23**	180	**3.4**	**42**	0.29	**370**	0.75	0.61
SB-45 (6-12")	**1.6**	13	58	.94	18	.06	83	.47	.22
SB-49	1.5	12	64	1.2	24	0.29	140	0.75	0.26
SB-50	**2.0**	11	65	1.5	24	0.26	140	0.7	0.32
SB-54	1.5	11	57	1.1	24	0.26	120	0.7	0.24
SB-55	**2.0**	14	65	1.3	23	0.27	160	0.7	0.33
SB-56	**2.0**	14	110	1.4	**32**	0.25	**330**	0.7	0.39
SB-57	1.2	14	56	1.1	22	0.27	180	0.7	0.33
SB-58	1.8	13	67	1.3	24	0.29	170	0.75	0.33
SB-59	**5.7**	15	160	**2.9**	25	0.26	**410**	0.7	0.53
Total	75.4	284	2154	46.0	555	4.9	4072	14.64	13.23
EPC	**3.3**	12.3	93.7	**2.00**	24.1	0.21	177	0.64	0.58
S-1	2.0	20	1000	2.0	30	100	300	400	20
GARDEN	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-63	0.87	11	130	1.3	29	0.29	**370**	0.75	0.61
SB-63 (6-12")	NA	9.4	89	0.78	20	0.11	220	0.40	0.77
SB-64	0.83	11	150	1.4	**30**	0.25	**370**	0.7	0.53
SB-64 (6-12")	NA	9.6	120	0.96	22	0.13	**300**	0.58	0.77
SB-65	0.75	13	190	**2.6**	**32**	0.26	**470**	0.7	0.78
SB-65 (6-12")	NA	11	180	**2.7**	23	0.32	**500**	0.84	0.68
SB-66	1.2	12	130	1.3	29	0.29	**340**	0.7	0.78
SB-66 (6-12")	NA	13	82	1.1	21	0.05	200	0.39	0.59
SB-67	0.79	13	170	1.6	**31**	0.29	**400**	0.75	0.84
SB-67	NA	12	140	1.3	22	0.19	**310**	0.43	0.83

(6-12")									
GARDEN	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-68	0.84	12	390	1.5	**35**	0.30	**410**	0.75	0.67
SB-68 (6-12")	NA	9.3	120	1.2	25	0.15	**350**	0.41	0.74
SB-69	1.4	10	140	**2.0**	26	0.22	**360**	0.57	0.87
SB-69 (6-12")	NA	11	280	**4.0**	26	0.37	**550**	0.61	0.56
SB-70	0.78	8.0	100	1.0	20	0.11	**610**	0.46	0.61
SB-70 (6-12")	NA	9.5	110	1.4	24	0.21	**350**	0.37	0.72
Total	7.46	164	2521	26.14	415	3.54	6110	9.41	11.35
EPC	0.9	10.3	157.6	1.63	25.94	0.22	**382**	0.59	0.71
S-1 Std.	2.0	20	1000	2.0	30	100	300	400	20
EPC Tot.	**2.15**	11.3	125.7	1.82	25.02	0.21	279.5	0.62	0.65
Bkgd.(Nat.)	**NA**	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	**NA**	20	50	3	40	5	600	1	1

NA = Not Analyzed

#53 Hofmann Avenue Soil Sampling Data (mg/kg) 10/2/07 (0-6")									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-05	1.3	7.9	43	0.93	16	0.05	89	0.13	0.21
SB-06	1.3	7.2	42	0.87	16	0.05	77	0.53	0.24
SB-07	0.5	8.3	49	0.73	15	0.05	74	0.12	0.22
SB-08	0.4	7.7	40	0.59	14	0.05	54	0.40	0.21
SB-13	0.4	8.7	47	0.70	16	0.05	69	0.29	0.23
SB-14	0.6	8.2	51	0.81	17	0.05	76	0.38	0.26
SB-15	1.2	7.1	76	1.7	19	0.05	120	0.26	0.25
SB-19	0.6	11	46	0.68	18	0.05	70	0.12	0.22
SB-20	1.6	8.2	58	1.2	19	0.05	120	0.13	0.26
SB-21	**3.1**	9.4	**2200**	**2.4**	**130**	2.0	**760**	0.41	0.34
SB-21 (6-12")		9.7	340	**2.3**	**100**	1.3	**250**	.52	.27
SB-25	0.3	8.0	37	0.58	28	0.14	52	0.32	0.22
SB-26	0.4	9.8	50	0.94	17	0.12	75	0.36	0.25
SB-27	1.7	7.7	50	1.0	17	0.05	110	0.13	0.27
SB-32	2.0	14	68	1.6	21	0.15	140	0.40	0.35
SB-33	**3.4**	11	56	1.7	21	0.05	130	0.41	0.36
SB-34	1.2	11	270	**15**	28	0.31	**340**	1.6	0.52
SB-36	1.6	12	54	0.99	19	0.05	110	0.38	0.36
SB-38	1.9	17	280	**13**	27	0.14	290	1.1	0.72
Total	23.5	174.2	3517	45.4	558	4.76	3006	7.99	5.76
EPC	1.3	9.7	203	**2.5**	29.4	0.19	158	0.42	0.30
S-1 Std.	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

Former Tombarello and Sons Property
207 Marston Street
Lawrence, MA
RTN: 3-18126

MassDEP Contact:

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Environmental Analyst
Bureau of Waste Site Cleanup
MassDEP Northeast Regional Office
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On-Scene Coordinator
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Office: 617-918-1344
Cell: 617-257-2251

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FIGURE 1
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS

HOFMANN AVE

1" 1/2" 0" 1"

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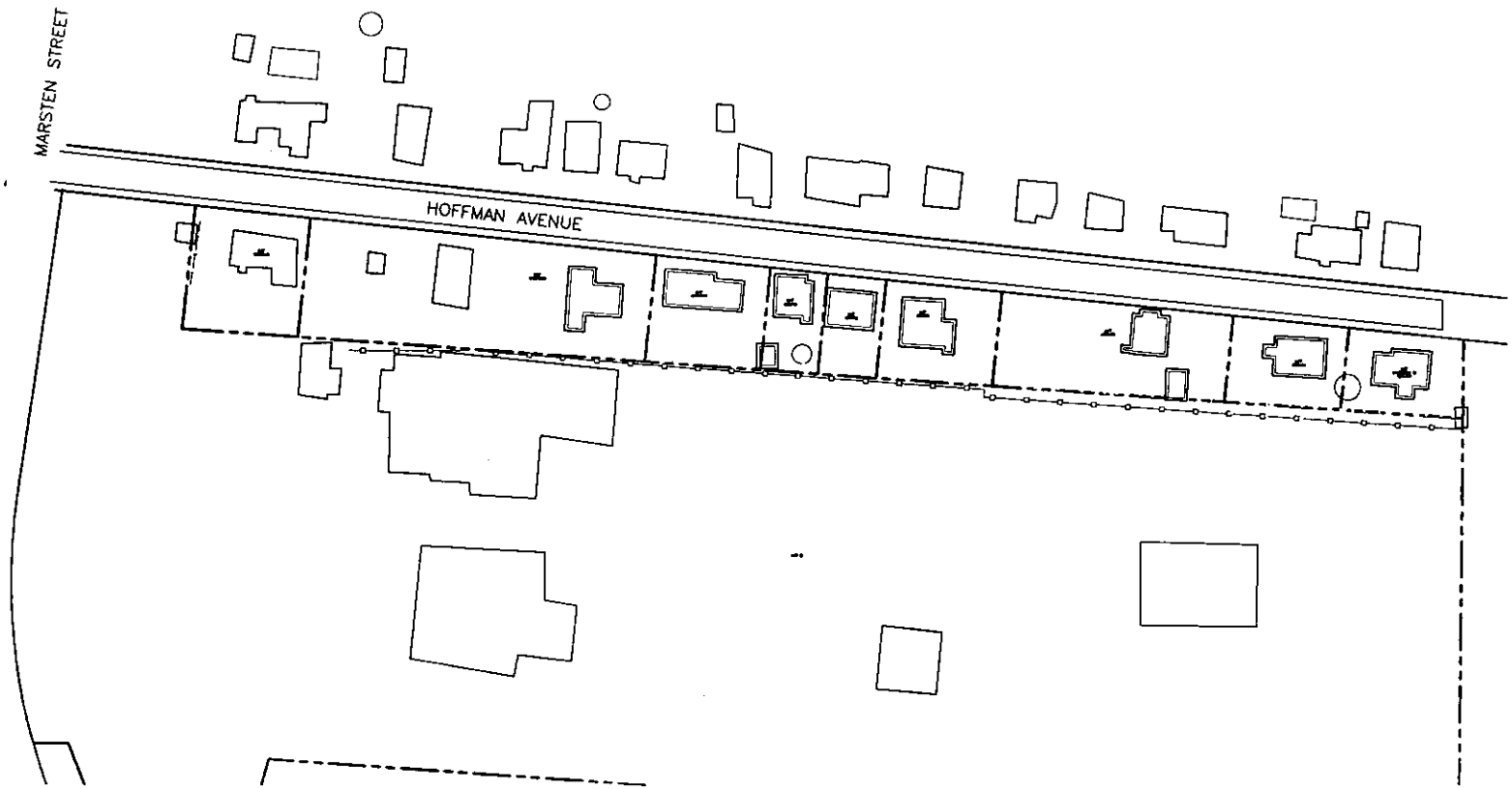

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FIGURE 1
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS

HOFMANN AVE

1" 1/2" 0" 1"

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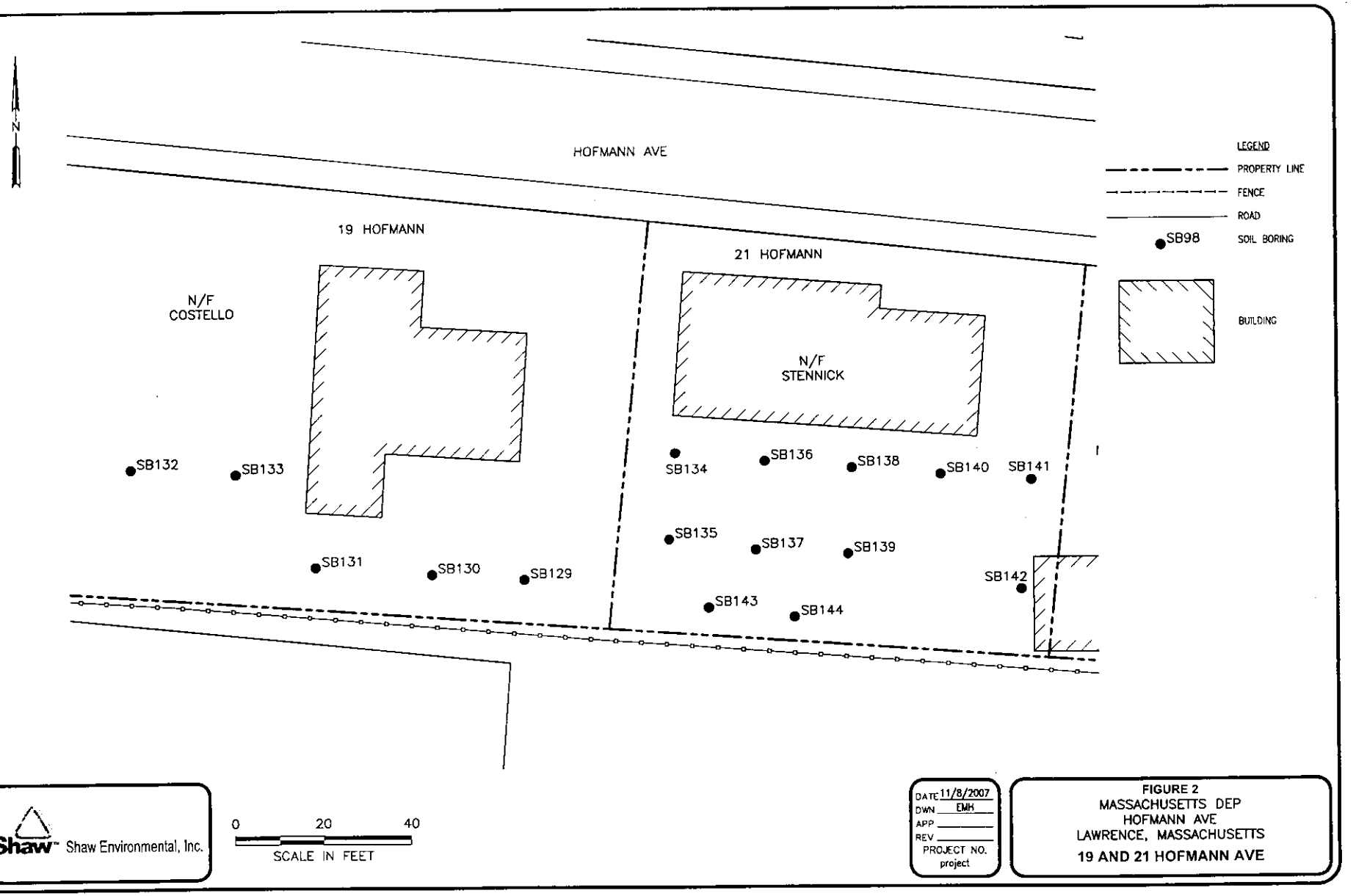

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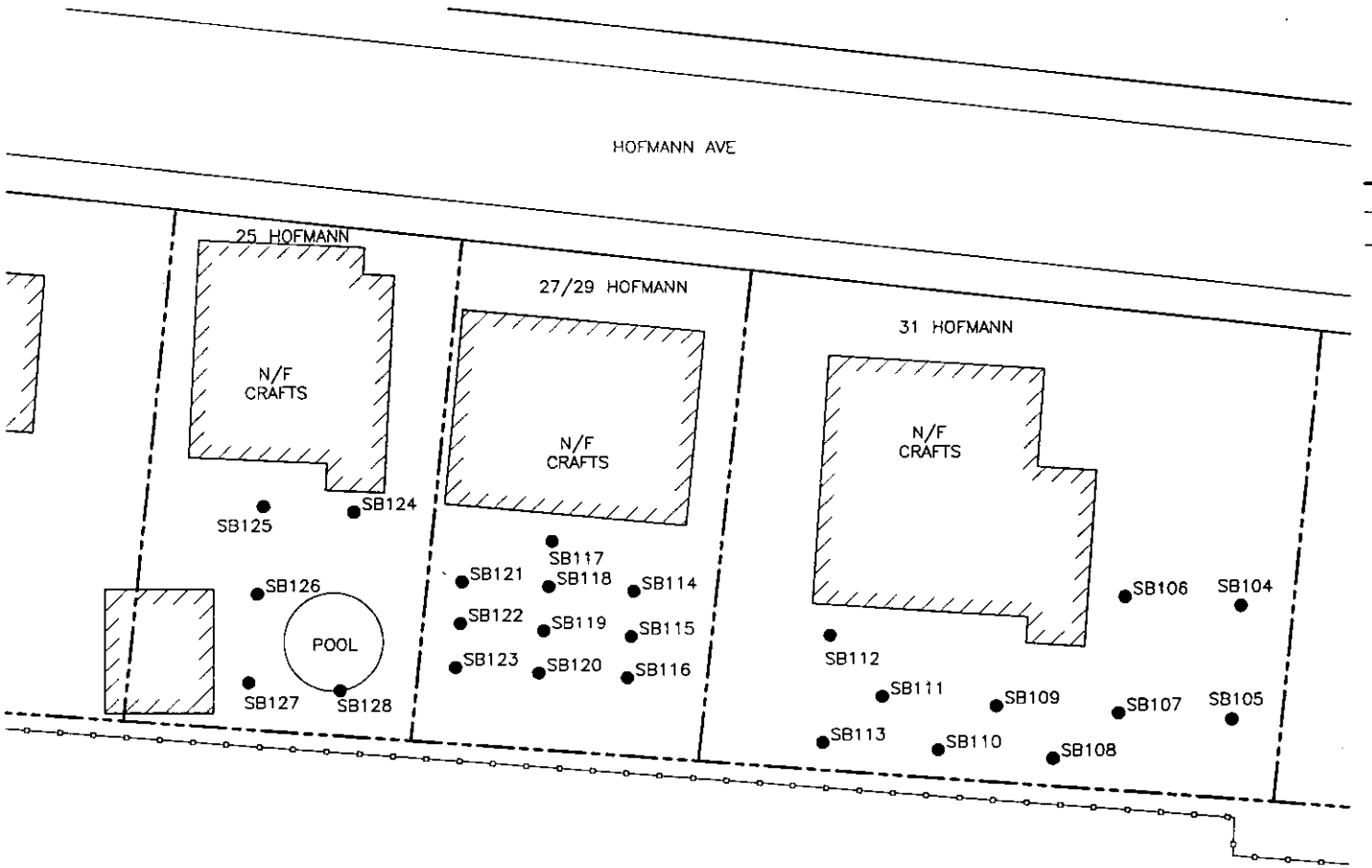

Shaw Shaw Environmental, Inc.

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DATE 11/8/2007
DWN EMH
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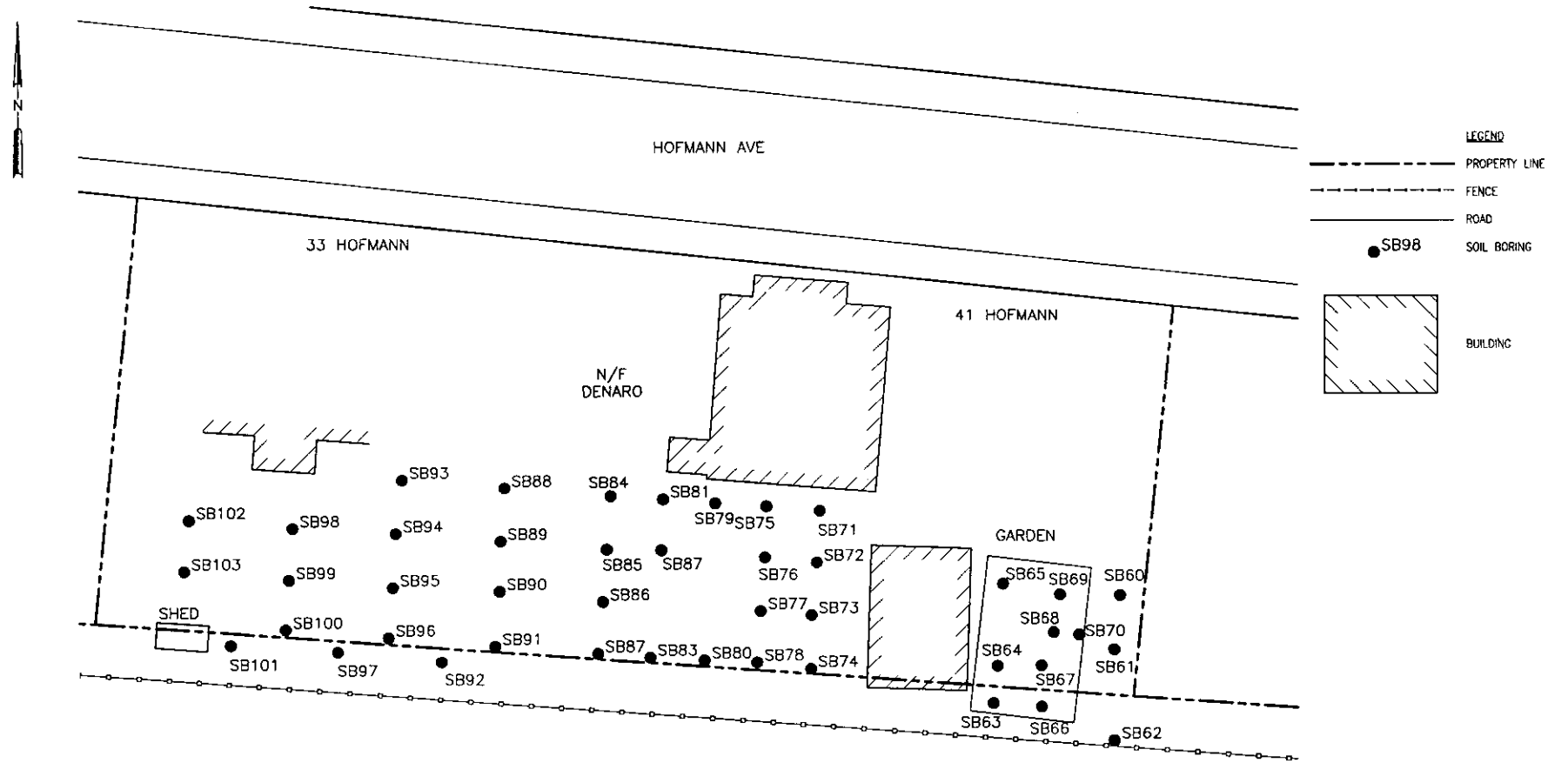
PROJECT NO. project

FIGURE 3
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
25, 27, 29 AND 31 HOFMANN AVE

File: J:\dwg\sorse\Lawrence MA\smdef-01.dwg Layout: 25 27 29 & 31 Hofmann User: eichart Nov 08, 2007 - 6:19pm

1" 1/2" 0" 1"


N
HOFMANN AVE
33 HOFMANN
41 HOFMANN
N/F
DENARO
GARDEN
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SB103
SB100
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LEGEND
PROPERTY LINE
FENCE
ROAD
SB98
SOIL BORING
BUILDING
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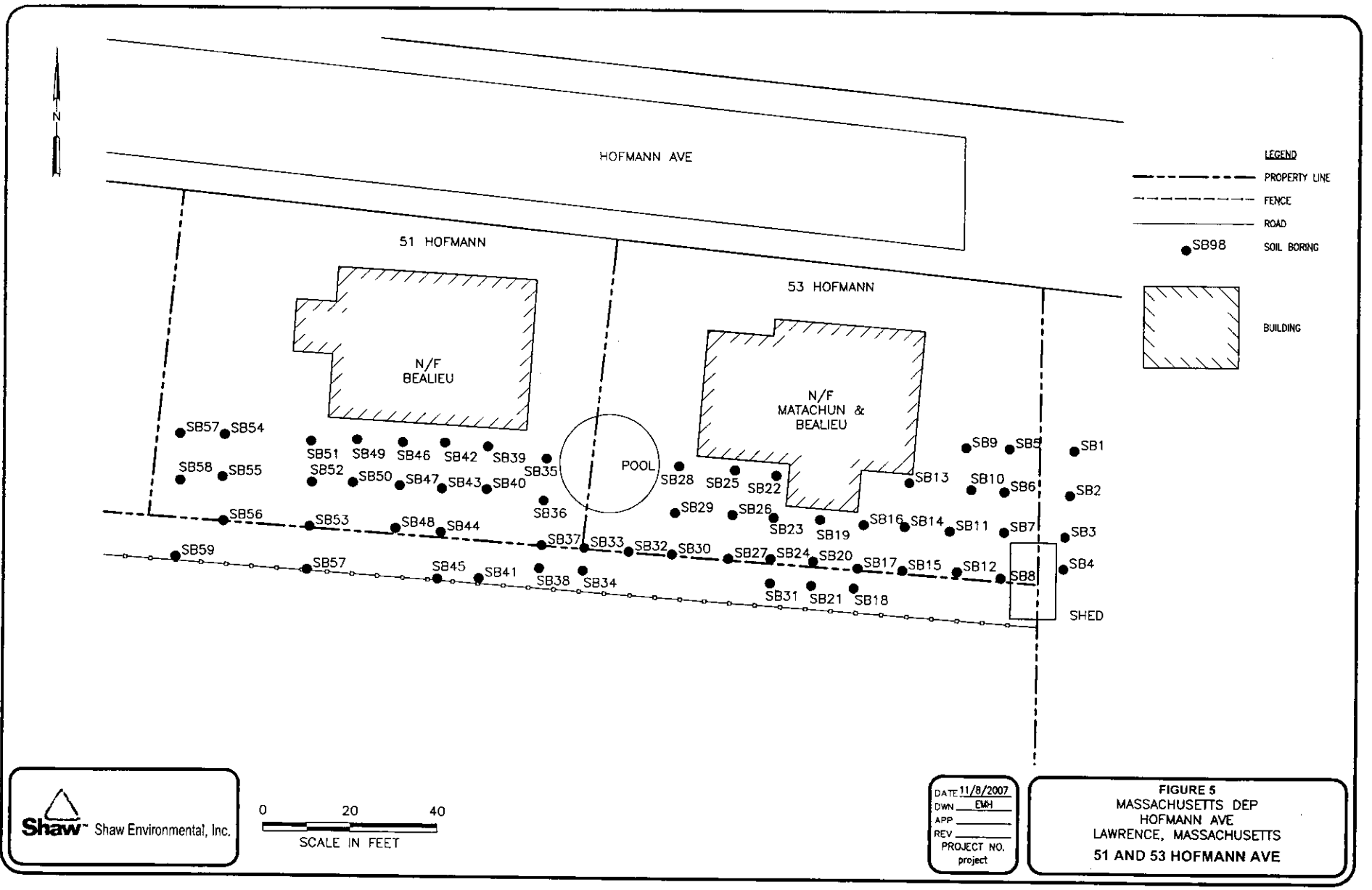
FIGURE 4
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
33 AND 41 HOFMANN AVE
File: J:\dwg\sans\Lawrence MA\smdef-01.dwg Layout: 33 & 41 Hofmann User: eric.hart Nov 12, 2007 - 2:03pm
1" 1/2" 0" 1"



Shaw™ Shaw Environmental, Inc.

DATE 11/8/2007
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FIGURE 5
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
51 AND 53 HOFMANN AVE

#19 Hofmann Avenue Soil Sampling Data (mg/kg) 10/5/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-129	.80	31	140	1.7	**40**	.25	170	.70	.51
SB-130	.49	11	110	1.4	27	2.7	170	.70	.31
SB-131	.64	11	90	1.4	28	.30	210	.75	.36
SB-132	1.3	9.9	68	1.1	24	.30	220	.75	.33
SB-133	.19	11	37	1.1	**37**	.26	88	.70	.17
Total	3.42	73.9	445	6.7	156	3.81	858	3.6	1.68
EPC	.68	14.8	89	1.34	**31.2**	.76	171.6	.72	.34
S-1	2.0	20	1000	2.0	**30**	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#21 Hofmann Avenue Soil Sampling Data (mg/kg) 10/5/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-134	1.2	9.3	50	.85	21	.27	91	.75	.30
SB-135	1.5	12	77	1.3	27	1.8	230	.75	.37
SB-136	1.6	11	50	.95	21	.27	130	.70	.35
SB-137	1.9	12	62	1.0	23	.26	150	.70	.36
SB-138	.92	19	44	.98	22	.25	91	.70	.26
SB-139	.38	10	50	.96	25	.27	83	.70	.20
SB-140	.95	16	52	.88	**34**	.29	79	.75	.14
SB-141	1.4	12	50	.98	25	.29	100	.70	.24
SB-142	3.8	13	71	1.5	23	.27	**320**	.70	.90
SB-143	**2.4**	9.2	75	**2.3**	27	.27	180	.70	.44
SB-144	4.1	11	76	**2.2**	26	.27	220	.70	.43
Total	20.15	134.5	657	13.9	274	4.51	1524	7.85	3.99
EPC	1.83	12.2	59.7	1.26	24.91	.41	138.5	.71	.36
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#25 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-124	.97	12	56	.72	22	.25	120	.70	.22
SB-125	.92	12	120	1.8	30	.25	**380**	.60	.38
SB-126	1.5	14	240	**3.5**	24	.27	**600**	.70	.43
SB-127	.96	13	97	1.5	27	.29	160	.75	.46
SB-128	.71	12	100	1.6	27	.27	240	.70	.43
Total	5.06	63	613	9.12	130	1.33	1500	3.45	2.06
EPC	1.01	12.6	122.6	1.8	26	.27	300	.69	.41
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#27/29 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-114	.29	12	64	1.2	24	.25	130	.60	.22
SB-115	.25	10	44	.96	28	.25	71	.70	.21
SB-116	.71	20	79	1.1	24	.25	150	.70	.40
SB-117	.11	6.7	32	.58	19	.25	35	.70	.079
SB-118	.19	10	43	.70	23	.27	77	.70	.16
SB-119	.22	8.5	42	.61	20	.25	83	.70	.23
SB-120	.39	15	45	.65	20	.27	78	.70	.25
SB-121	.34	15	52	.80	29	.25	81	.70	.14
SB-122	.43	21	42	.93	**34**	.27	70	.70	.22
SB-123	.64	17	51	.78	24	.25	110	.70	.27
Total	3.57	125.2	494	8.31	245	2.56	885	6.9	2.18
EPC	.36	12.5	49.4	.83	24.5	.26	88.5	.69	.22
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#31 Hofmann Avenue Soil Sampling Data 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-104	.57	7.7	53	.77	26	.27	100	.70	.20
SB-105	1.7	15	81	1.5	28	.26	210	.70	.40
SB-106	.71	8.6	66	.98	24	.26	170	.70	.32
SB-107	2.0	12	79	1.4	31	.26	220	.70	.34
SB-108	.80	9.9	60	1.0	26	.25	180	.60	.32
SB-109	.37	9.7	82	.80	24	.27	170	.70	.18
SB-110	3.0	11	81	1.7	31	.25	220	.60	.40
SB-111	.19	8.0	49	.58	24	.25	73	.70	.10
SB-112	.27	7.6	43	.78	25	.27	72	.70	.15
SB-113	1.2	9.7	62	1.1	26	.26	170	.70	.54
Total	9.81	99.2	656	10.61	265	2.6	1755	6.8	2.95
EPC	.98	9.92	65.6	1.06	26.5	.26	175.5	.68	.30
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#33 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-84	.69	9.0	160	1.7	20	.26	290	.76	.33
SB-85	.57	11	95	0.93	24	.35	230	.75	.30
SB-86	.33	9.4	82	.82	23	.28	180	1.4	.19
SB-87	.60	9.9	91	.97	27	.28	260	.70	.25
SB-88	.54	10	120	1.1	28	.33	280	.53	.75
SB-89	.063	6.9	45	.31	32	.28	53	.72	.071
SB-90	.46	11	83	.85	23	.27	230	.72	.41
SB-91	.009	7.4	45	.29	26	.27	42	.72	.056
SB-92	1.0	9.5	83	.98	22	.27	230	.72	.27
SB-93	.025	7.1	43	.27	24	.24	35	.51	.049
SB-94	.009	6.9	45	.28	25	.26	50	.72	.075
SB-95	.16	10	64	.26	24	.24	100	.72	.11
SB-96	.77	9.9	100	1.1	23	.24	260	.75	.26
SB-97	.009	7.3	43	.26	27	.26	31	.70	.068
SB-98	.092	8.7	66	.72	23	.27	200	.72	.17
SB-99	.012	6.9	48	.34	26	.27	33	.70	.077
SB-100	.087	6.6	53	.37	20	.25	68	.70	.093
SB-101	.019	6.8	48	.40	25	.23	55	.60	.074
SB-102	.14	9.7	67	.65	30	.27	120	.70	.18
SB-103	.009	6.9	44	.31	27	.25	50	.70	.077
Total	5.6	161	1425	12.91	499	5.37	3329	14.54	3.86
EPC	.28	8.05	71.25	0.65	24.95	.27	166	.73	.19
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#41Hofmann Avenue Soil Sampling Data (mg/kg) 10/3/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-71	1.5	8.9	100	1.5	22	0.19	**470**	0.15	1.3
SB-72	**3.4**	14	120	1.8	26	0.16	**530**	1.8	0.63
SB-73	**4.4**	12	250	6.0	**31**	0.29	**510**	1.2	0.71
SB-74	1.5	**20**	**1400**	**30**	**71**	0.53	**1300**	0.7	1.0
SB-75	1.2	9.0	110	1.6	24	0.6	**510**	0.68	0.52
SB-76	**4.2**	**57**	200	3.4	27	0.36	**1000**	1.1	0.89
SB-77	**4.6**	12	140	2.5	**33**	0.26	**510**	0.68	0.58
SB-78	1.3	17	330	6.1	27	0.11	**300**	0.84	0.44
SB-79	.78	10	130	1.7	19	0.21	**1000**	0.48	0.46
SB-80	**2.6**	17	200	3.7	28	0.29	**560**	0.7	0.52
SB-81	.40	11	100	1.2	24	0.29	**400**	0.7	0.46
SB-82	.32	11	52	0.48	20	0.24	110	0.6	0.16
SB-83	.58	17	290	**2.5**	27	0.24	220	0.6	1.6
Total	26.8	216	3422	62.5	379	3.77	7420	10.23	9.27
EPC	**2.1**	16.6	263	**4.8**	29.2	0.3	**571**	0.79	0.7
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#51Hofmann Avenue Soil Sampling Data (mg/kg)10/2/07 (0-6")									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-32	**2.0**	14	68	1.6	21	0.15	140	0.40	0.35
SB-33	**3.4**	11	56	1.7	21	0.05	130	0.41	0.36
SB-34	1.2	11	270	**15**	28	0.31	**340**	1.6	0.52
SB-36	1.6	12	54	0.99	19	0.05	110	0.38	0.36
SB-38	1.9	17	280	**13**	27	0.14	290	1.1	0.72
SB-39	1.1	9.7	51	0.89	26	0.11	91	0.13	0.66
SB-40	1.6	10	49	0.92	17	0.05	92	0.34	0.26
SB-41	**22.0**	14	180	**3.6**	**47**	0.24	**300**	0.30	0.71
SB-41 (6-12")	**5.1**	8.6	65	1.3	18	.55	76	.44	.31
SB-42	1.0	9.5	57	0.95	23	0.21	100	0.7	0.05
SB-43	1.9	13	65	1.3	24	0.24	130	0.75	0.31
SB-44	3.3	14	77	1.6	26	0.26	170	0.7	0.33
SB-45	**10.0**	**23**	180	**3.4**	**42**	0.29	**370**	0.75	0.61
SB-45 (6-12")	**1.6**	13	58	.94	18	.06	83	.47	.22
SB-49	1.5	12	64	1.2	24	0.29	140	0.75	0.26
SB-50	**2.0**	11	65	1.5	24	0.26	140	0.7	0.32
SB-54	1.5	11	57	1.1	24	0.26	120	0.7	0.24
SB-55	**2.0**	14	65	1.3	23	0.27	160	0.7	0.33
SB-56	**2.0**	14	110	1.4	**32**	0.25	**330**	0.7	0.39
SB-57	1.2	14	56	1.1	22	0.27	180	0.7	0.33
SB-58	1.8	13	67	1.3	24	0.29	170	0.75	0.33
SB-59	**5.7**	15	160	**2.9**	25	0.26	**410**	0.7	0.53
Total	75.4	284	2154	46.0	555	4.9	4072	14.64	13.23
EPC	**3.3**	12.3	93.7	**2.00**	24.1	0.21	177	0.64	0.58
S-1	2.0	20	1000	2.0	30	100	300	400	20
GARDEN	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-63	0.87	11	130	1.3	29	0.29	**370**	0.75	0.61
SB-63 (6-12")	NA	9.4	89	0.78	20	0.11	220	0.40	0.77
SB-64	0.83	11	150	1.4	**30**	0.25	**370**	0.7	0.53
SB-64 (6-12")	NA	9.6	120	0.96	22	0.13	**300**	0.58	0.77
SB-65	0.75	13	190	**2.6**	**32**	0.26	**470**	0.7	0.78
SB-65 (6-12")	NA	11	180	**2.7**	23	0.32	**500**	0.84	0.68
SB-66	1.2	12	130	1.3	29	0.29	**340**	0.7	0.78
SB-66 (6-12")	NA	13	82	1.1	21	0.05	200	0.39	0.59
SB-67	0.79	13	170	1.6	**31**	0.29	**400**	0.75	0.84
SB-67	NA	12	140	1.3	22	0.19	**310**	0.43	0.83

(6-12")									
GARDEN	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-68	0.84	12	390	1.5	**35**	0.30	**410**	0.75	0.67
SB-68 (6-12")	NA	9.3	120	1.2	25	0.15	**350**	0.41	0.74
SB-69	1.4	10	140	**2.0**	26	0.22	**360**	0.57	0.87
SB-69 (6-12")	NA	11	280	**4.0**	26	0.37	**550**	0.61	0.56
SB-70	0.78	8.0	100	1.0	20	0.11	**610**	0.46	0.61
SB-70 (6-12")	NA	9.5	110	1.4	24	0.21	**350**	0.37	0.72
Total	7.46	164	2521	26.14	415	3.54	6110	9.41	11.35
EPC	0.9	10.3	157.6	1.63	25.94	0.22	**382**	0.59	0.71
S-1 Std.	2.0	20	1000	2.0	30	100	300	400	20
EPC Tot.	**2.15**	11.3	125.7	1.82	25.02	0.21	279.5	0.62	0.65
Bkgd.(Nat.)	**NA**	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	**NA**	20	50	3	40	5	600	1	1

NA = Not Analyzed

#53 Hofmann Avenue Soil Sampling Data (mg/kg) 10/2/07 (0-6")									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-05	1.3	7.9	43	0.93	16	0.05	89	0.13	0.21
SB-06	1.3	7.2	42	0.87	16	0.05	77	0.53	0.24
SB-07	0.5	8.3	49	0.73	15	0.05	74	0.12	0.22
SB-08	0.4	7.7	40	0.59	14	0.05	54	0.40	0.21
SB-13	0.4	8.7	47	0.70	16	0.05	69	0.29	0.23
SB-14	0.6	8.2	51	0.81	17	0.05	76	0.38	0.26
SB-15	1.2	7.1	76	1.7	19	0.05	120	0.26	0.25
SB-19	0.6	11	46	0.68	18	0.05	70	0.12	0.22
SB-20	1.6	8.2	58	1.2	19	0.05	120	0.13	0.26
SB-21	**3.1**	9.4	**2200**	**2.4**	**130**	2.0	**760**	0.41	0.34
SB-21 (6-12")		9.7	340	**2.3**	**100**	1.3	**250**	.52	.27
SB-25	0.3	8.0	37	0.58	28	0.14	52	0.32	0.22
SB-26	0.4	9.8	50	0.94	17	0.12	75	0.36	0.25
SB-27	1.7	7.7	50	1.0	17	0.05	110	0.13	0.27
SB-32	2.0	14	68	1.6	21	0.15	140	0.40	0.35
SB-33	**3.4**	11	56	1.7	21	0.05	130	0.41	0.36
SB-34	1.2	11	270	**15**	28	0.31	**340**	1.6	0.52
SB-36	1.6	12	54	0.99	19	0.05	110	0.38	0.36
SB-38	1.9	17	280	**13**	27	0.14	290	1.1	0.72
Total	23.5	174.2	3517	45.4	558	4.76	3006	7.99	5.76
EPC	1.3	9.7	203	**2.5**	29.4	0.19	158	0.42	0.30
S-1 Std.	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

Former Tombarello and Sons Property
207 Marston Street
Lawrence, MA
RTN: 3-18126

MassDEP Contact:

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Environmental Analyst
Bureau of Waste Site Cleanup
MassDEP Northeast Regional Office
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Emergency Response Team Lead
On-Scene Coordinator
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Boston, MA 02114
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FIGURE 1
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS

HOFMANN AVE

1" 1/2" 0" 1"

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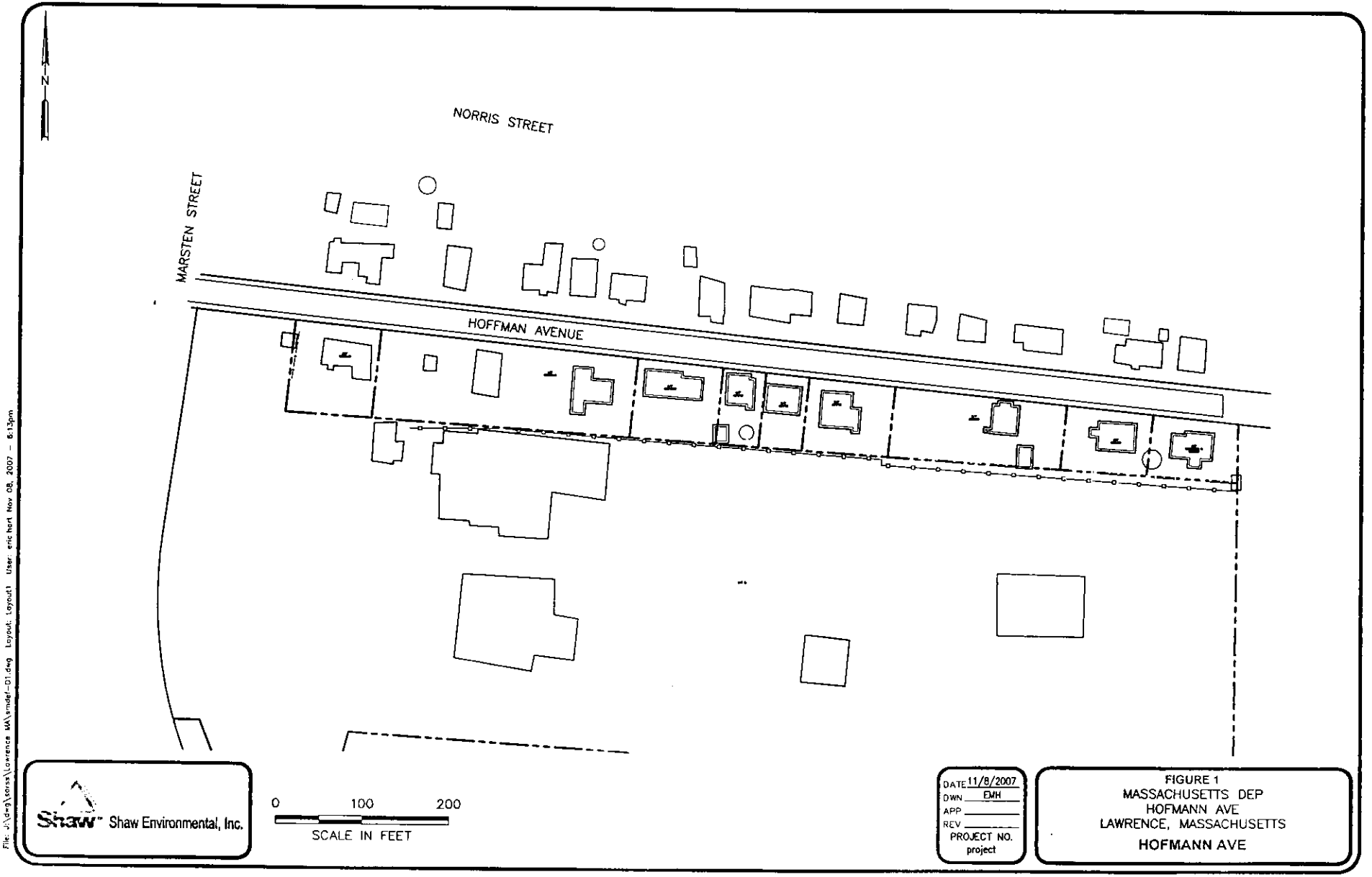
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NORRIS STREET
MARSTEN STREET
HOFFMAN AVENUE
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SCALE IN FEET
Shaw Environmental, Inc.
DATE 11/8/2007
DWN EMH
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PROJECT NO.
project
FIGURE 1
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
HOFMANN AVE
1" 1/2" 0" 1"
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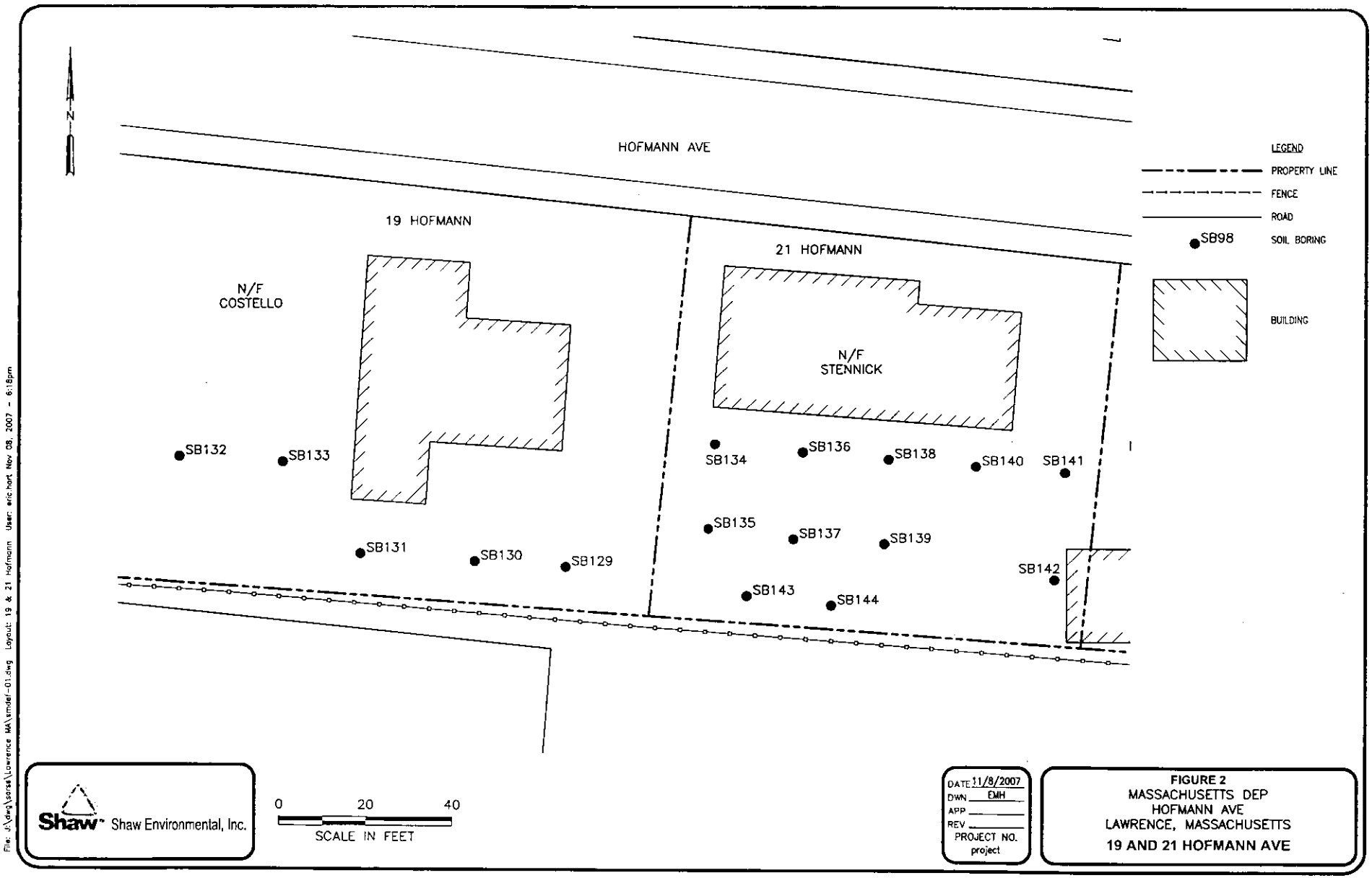

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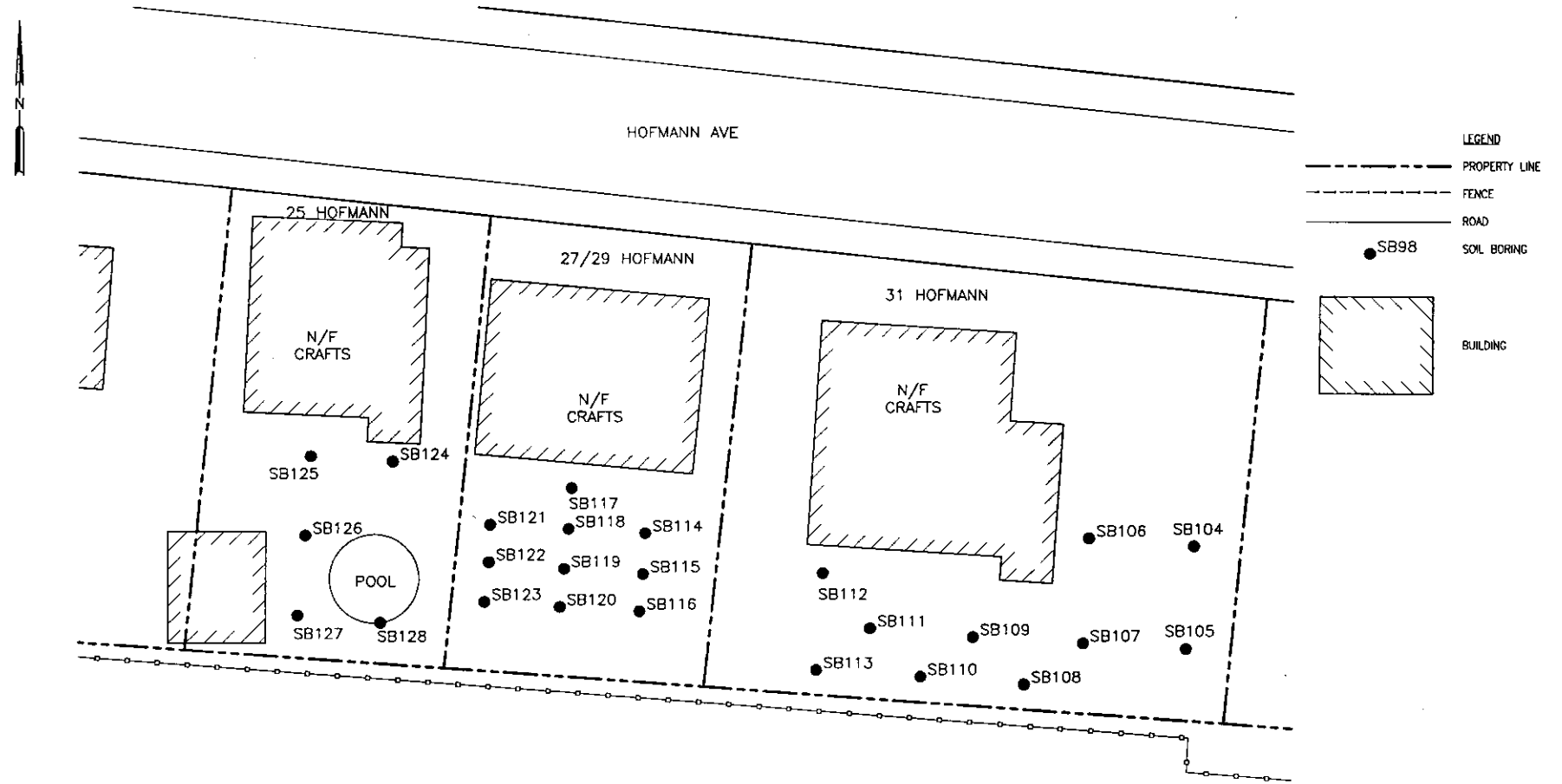
1" 1/2" 0" 1"



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SCALE IN FEET

DATE 11/8/2007
DWN EMH
APP
REV
PROJECT NO. project

FIGURE 3
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
25, 27, 29 AND 31 HOFMANN AVE

1" 1/2" 0" 1"

File: J:\dwg\sonar\Lawrence MA\sndaf-01.dwg Layout: 25 27 29 & 31 Hofmann User: erichart Nov 08, 2007 - 6:19pm

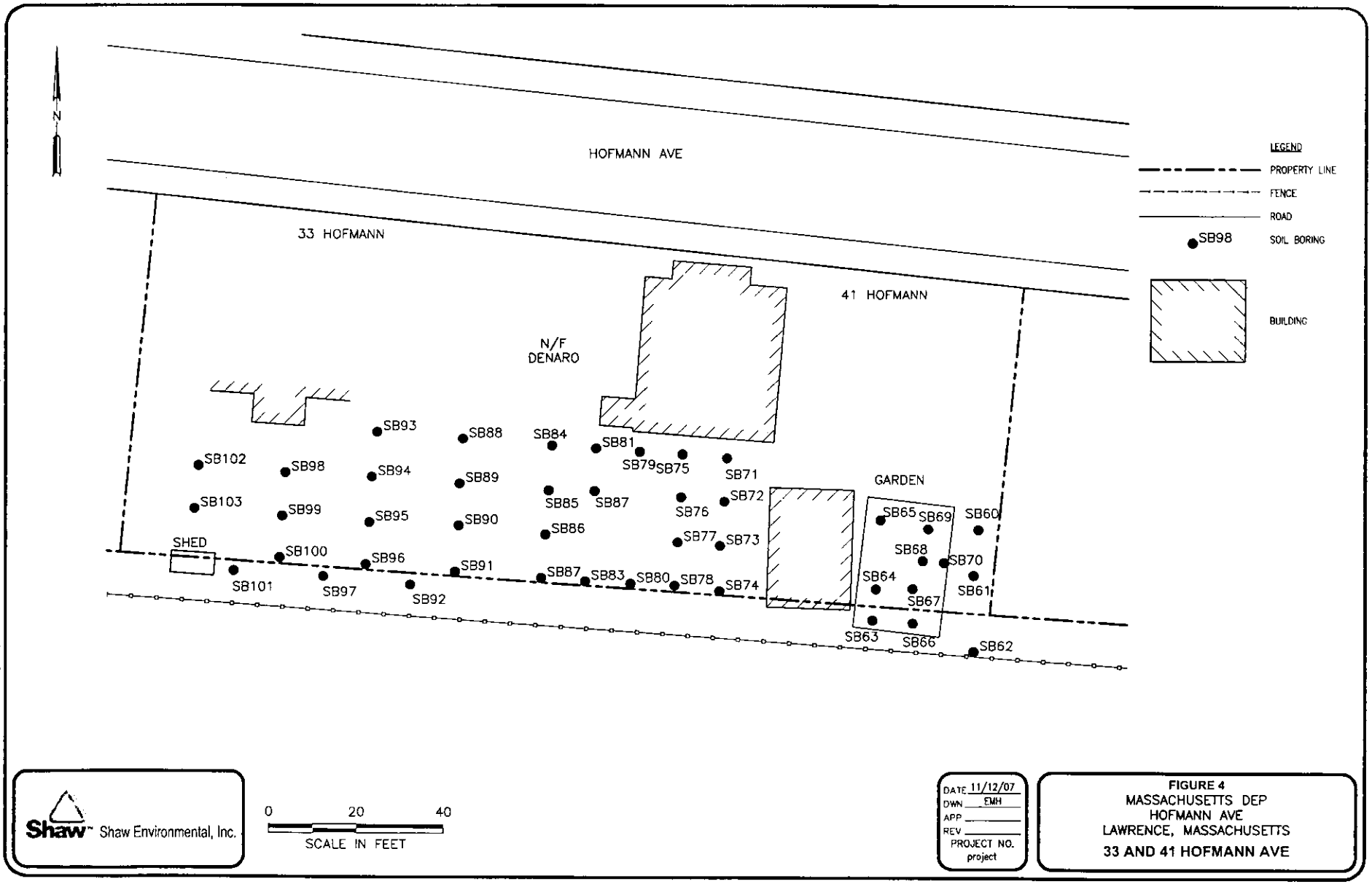

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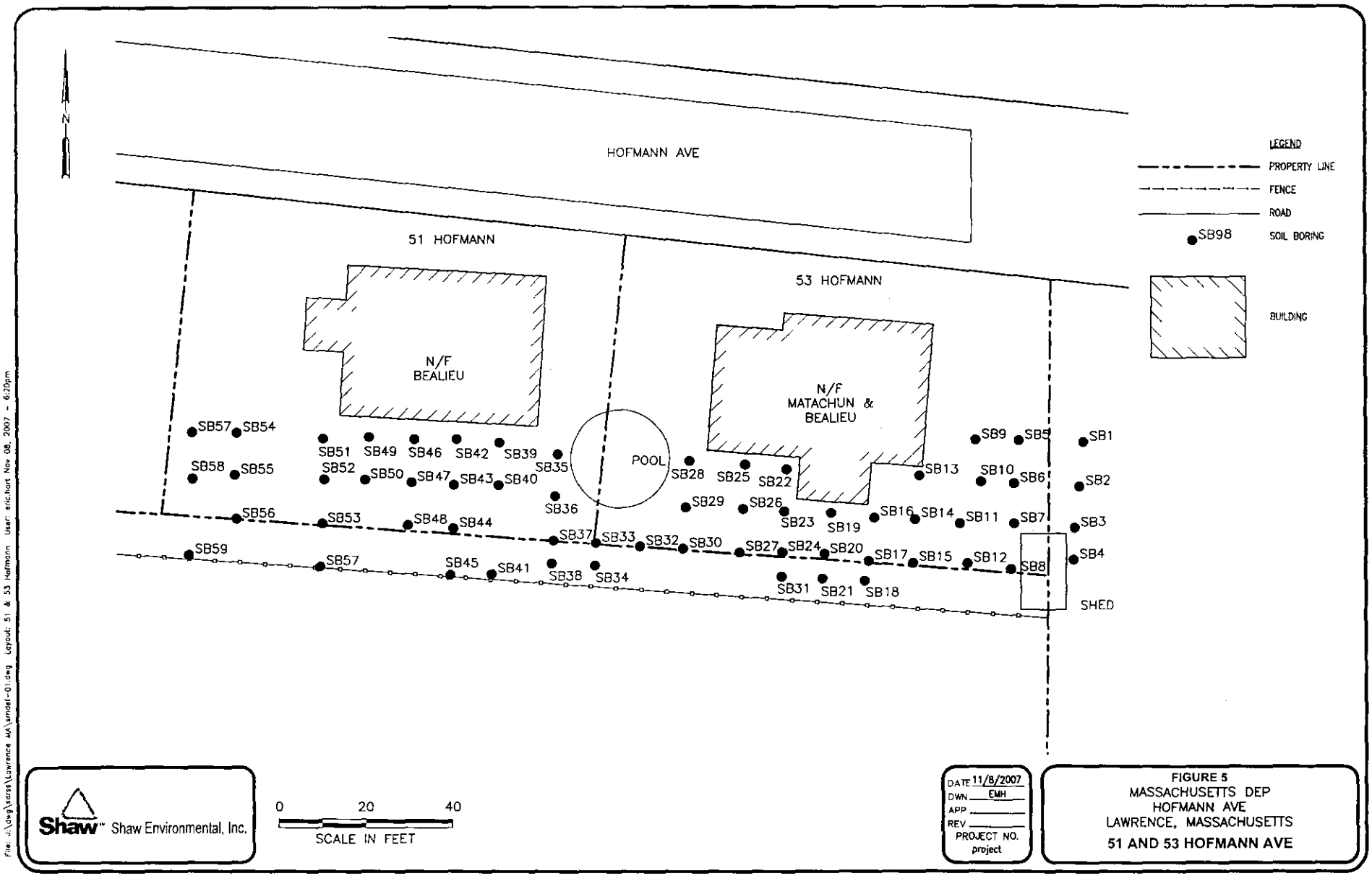
FIGURE 4
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
33 AND 41 HOFMANN AVE

1" 1/2" 0" 1"

File: J:\dwg\jerse\Lawrence MA\jmdat-01.dwg Layout: 33 & 41 Hofmann User: erichart Nov 12, 2007 - 2:03pm


N
HOFMANN AVE
51 HOFMANN
53 HOFMANN
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LEGEND
PROPERTY LINE
FENCE
ROAD
SB98
SOIL BORING
BUILDING
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SB56
SB59
SB51 SB49 SB46 SB42 SB39
SB52 SB50 SB47 SB43 SB40
SB53 SB48 SB44
SB57 SB45 SB41 SB38 SB34
SB35
SB36
SB37 SB33 SB32 SB30
SB28 SB25 SB22
SB29 SB26 SB23
SB27 SB24 SB20 SB19
SB31 SB21 SB18
SB89 SB5 SB1
SB13 SB10 SB6 SB2
SB16 SB14 SB11 SB7 SB3
SB17 SB15 SB12 SB8 SB4
Shaw™ Shaw Environmental, Inc.
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SCALE IN FEET
DATE 11/8/2007
DWN EMH
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PROJECT NO.
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FIGURE 5
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
51 AND 53 HOFMANN AVE
File: J:\dwg\sarss\Lawrence MA\smdefi-01.dwg Layout: 51 & 53 Hofmann User: erichart Nov 08, 2007 - 6:20pm
1" 1/2" 0" 1"

#19 Hofmann Avenue Soil Sampling Data (mg/kg) 10/5/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-129	.80	31	140	1.7	**40**	.25	170	.70	.51
SB-130	.49	11	110	1.4	27	2.7	170	.70	.31
SB-131	.64	11	90	1.4	28	.30	210	.75	.36
SB-132	1.3	9.9	68	1.1	24	.30	220	.75	.33
SB-133	.19	11	37	1.1	**37**	.26	88	.70	.17
Total	3.42	73.9	445	6.7	156	3.81	858	3.6	1.68
EPC	.68	14.8	89	1.34	**31.2**	.76	171.6	.72	.34
S-1	2.0	20	1000	2.0	**30**	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#21 Hofmann Avenue Soil Sampling Data (mg/kg) 10/5/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-134	1.2	9.3	50	.85	21	.27	91	.75	.30
SB-135	1.5	12	77	1.3	27	1.8	230	.75	.37
SB-136	1.6	11	50	.95	21	.27	130	.70	.35
SB-137	1.9	12	62	1.0	23	.26	150	.70	.36
SB-138	.92	19	44	.98	22	.25	91	.70	.26
SB-139	.38	10	50	.96	25	.27	83	.70	.20
SB-140	.95	16	52	.88	**34**	.29	79	.75	.14
SB-141	1.4	12	50	.98	25	.29	100	.70	.24
SB-142	3.8	13	71	1.5	23	.27	**320**	.70	.90
SB-143	**2.4**	9.2	75	**2.3**	27	.27	180	.70	.44
SB-144	4.1	11	76	**2.2**	26	.27	220	.70	.43
Total	20.15	134.5	657	13.9	274	4.51	1524	7.85	3.99
EPC	1.83	12.2	59.7	1.26	24.91	.41	138.5	.71	.36
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#25 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-124	.97	12	56	.72	22	.25	120	.70	.22
SB-125	.92	12	120	1.8	30	.25	**380**	.60	.38
SB-126	1.5	14	240	**3.5**	24	.27	**600**	.70	.43
SB-127	.96	13	97	1.5	27	.29	160	.75	.46
SB-128	.71	12	100	1.6	27	.27	240	.70	.43
Total	5.06	63	613	9.12	130	1.33	1500	3.45	2.06
EPC	1.01	12.6	122.6	1.8	26	.27	300	.69	.41
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#27/29 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-114	.29	12	64	1.2	24	.25	130	.60	.22
SB-115	.25	10	44	.96	28	.25	71	.70	.21
SB-116	.71	20	79	1.1	24	.25	150	.70	.40
SB-117	.11	6.7	32	.58	19	.25	35	.70	.079
SB-118	.19	10	43	.70	23	.27	77	.70	.16
SB-119	.22	8.5	42	.61	20	.25	83	.70	.23
SB-120	.39	15	45	.65	20	.27	78	.70	.25
SB-121	.34	15	52	.80	29	.25	81	.70	.14
SB-122	.43	21	42	.93	**34**	.27	70	.70	.22
SB-123	.64	17	51	.78	24	.25	110	.70	.27
Total	3.57	125.2	494	8.31	245	2.56	885	6.9	2.18
EPC	.36	12.5	49.4	.83	24.5	.26	88.5	.69	.22
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#31 Hofmann Avenue Soil Sampling Data 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-104	.57	7.7	53	.77	26	.27	100	.70	.20
SB-105	1.7	15	81	1.5	28	.26	210	.70	.40
SB-106	.71	8.6	66	.98	24	.26	170	.70	.32
SB-107	2.0	12	79	1.4	31	.26	220	.70	.34
SB-108	.80	9.9	60	1.0	26	.25	180	.60	.32
SB-109	.37	9.7	82	.80	24	.27	170	.70	.18
SB-110	3.0	11	81	1.7	31	.25	220	.60	.40
SB-111	.19	8.0	49	.58	24	.25	73	.70	.10
SB-112	.27	7.6	43	.78	25	.27	72	.70	.15
SB-113	1.2	9.7	62	1.1	26	.26	170	.70	.54
Total	9.81	99.2	656	10.61	265	2.6	1755	6.8	2.95
EPC	.98	9.92	65.6	1.06	26.5	.26	175.5	.68	.30
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#33 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-84	.69	9.0	160	1.7	20	.26	290	.76	.33
SB-85	.57	11	95	0.93	24	.35	230	.75	.30
SB-86	.33	9.4	82	.82	23	.28	180	1.4	.19
SB-87	.60	9.9	91	.97	27	.28	260	.70	.25
SB-88	.54	10	120	1.1	28	.33	280	.53	.75
SB-89	.063	6.9	45	.31	32	.28	53	.72	.071
SB-90	.46	11	83	.85	23	.27	230	.72	.41
SB-91	.009	7.4	45	.29	26	.27	42	.72	.056
SB-92	1.0	9.5	83	.98	22	.27	230	.72	.27
SB-93	.025	7.1	43	.27	24	.24	35	.51	.049
SB-94	.009	6.9	45	.28	25	.26	50	.72	.075
SB-95	.16	10	64	.26	24	.24	100	.72	.11
SB-96	.77	9.9	100	1.1	23	.24	260	.75	.26
SB-97	.009	7.3	43	.26	27	.26	31	.70	.068
SB-98	.092	8.7	66	.72	23	.27	200	.72	.17
SB-99	.012	6.9	48	.34	26	.27	33	.70	.077
SB-100	.087	6.6	53	.37	20	.25	68	.70	.093
SB-101	.019	6.8	48	.40	25	.23	55	.60	.074
SB-102	.14	9.7	67	.65	30	.27	120	.70	.18
SB-103	.009	6.9	44	.31	27	.25	50	.70	.077
Total	5.6	161	1425	12.91	499	5.37	3329	14.54	3.86
EPC	.28	8.05	71.25	0.65	24.95	.27	166	.73	.19
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#41Hofmann Avenue Soil Sampling Data (mg/kg) 10/3/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-71	1.5	8.9	100	1.5	22	0.19	**470**	0.15	1.3
SB-72	**3.4**	14	120	1.8	26	0.16	**530**	1.8	0.63
SB-73	**4.4**	12	250	6.0	**31**	0.29	**510**	1.2	0.71
SB-74	1.5	**20**	**1400**	**30**	**71**	0.53	**1300**	0.7	1.0
SB-75	1.2	9.0	110	1.6	24	0.6	**510**	0.68	0.52
SB-76	**4.2**	**57**	200	3.4	27	0.36	**1000**	1.1	0.89
SB-77	**4.6**	12	140	2.5	**33**	0.26	**510**	0.68	0.58
SB-78	1.3	17	330	6.1	27	0.11	**300**	0.84	0.44
SB-79	.78	10	130	1.7	19	0.21	**1000**	0.48	0.46
SB-80	**2.6**	17	200	3.7	28	0.29	**560**	0.7	0.52
SB-81	.40	11	100	1.2	24	0.29	**400**	0.7	0.46
SB-82	.32	11	52	0.48	20	0.24	110	0.6	0.16
SB-83	.58	17	290	**2.5**	27	0.24	220	0.6	1.6
Total	26.8	216	3422	62.5	379	3.77	7420	10.23	9.27
EPC	**2.1**	16.6	263	**4.8**	29.2	0.3	**571**	0.79	0.7
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#51Hofmann Avenue Soil Sampling Data (mg/kg)10/2/07 (0-6")									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-32	**2.0**	14	68	1.6	21	0.15	140	0.40	0.35
SB-33	**3.4**	11	56	1.7	21	0.05	130	0.41	0.36
SB-34	1.2	11	270	**15**	28	0.31	**340**	1.6	0.52
SB-36	1.6	12	54	0.99	19	0.05	110	0.38	0.36
SB-38	1.9	17	280	**13**	27	0.14	290	1.1	0.72
SB-39	1.1	9.7	51	0.89	26	0.11	91	0.13	0.66
SB-40	1.6	10	49	0.92	17	0.05	92	0.34	0.26
SB-41	**22.0**	14	180	**3.6**	**47**	0.24	**300**	0.30	0.71
SB-41 (6-12")	**5.1**	8.6	65	1.3	18	.55	76	.44	.31
SB-42	1.0	9.5	57	0.95	23	0.21	100	0.7	0.05
SB-43	1.9	13	65	1.3	24	0.24	130	0.75	0.31
SB-44	3.3	14	77	1.6	26	0.26	170	0.7	0.33
SB-45	**10.0**	**23**	180	**3.4**	**42**	0.29	**370**	0.75	0.61
SB-45 (6-12")	**1.6**	13	58	.94	18	.06	83	.47	.22
SB-49	1.5	12	64	1.2	24	0.29	140	0.75	0.26
SB-50	**2.0**	11	65	1.5	24	0.26	140	0.7	0.32
SB-54	1.5	11	57	1.1	24	0.26	120	0.7	0.24
SB-55	**2.0**	14	65	1.3	23	0.27	160	0.7	0.33
SB-56	**2.0**	14	110	1.4	**32**	0.25	**330**	0.7	0.39
SB-57	1.2	14	56	1.1	22	0.27	180	0.7	0.33
SB-58	1.8	13	67	1.3	24	0.29	170	0.75	0.33
SB-59	**5.7**	15	160	**2.9**	25	0.26	**410**	0.7	0.53
Total	75.4	284	2154	46.0	555	4.9	4072	14.64	13.23
EPC	**3.3**	12.3	93.7	**2.00**	24.1	0.21	177	0.64	0.58
S-1	2.0	20	1000	2.0	30	100	300	400	20
GARDEN	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-63	0.87	11	130	1.3	29	0.29	**370**	0.75	0.61
SB-63 (6-12")	NA	9.4	89	0.78	20	0.11	220	0.40	0.77
SB-64	0.83	11	150	1.4	**30**	0.25	**370**	0.7	0.53
SB-64 (6-12")	NA	9.6	120	0.96	22	0.13	**300**	0.58	0.77
SB-65	0.75	13	190	**2.6**	**32**	0.26	**470**	0.7	0.78
SB-65 (6-12")	NA	11	180	**2.7**	23	0.32	**500**	0.84	0.68
SB-66	1.2	12	130	1.3	29	0.29	**340**	0.7	0.78
SB-66 (6-12")	NA	13	82	1.1	21	0.05	200	0.39	0.59
SB-67	0.79	13	170	1.6	**31**	0.29	**400**	0.75	0.84
SB-67	NA	12	140	1.3	22	0.19	**310**	0.43	0.83

(6-12")									
GARDEN	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-68	0.84	12	390	1.5	**35**	0.30	**410**	0.75	0.67
SB-68 (6-12")	NA	9.3	120	1.2	25	0.15	**350**	0.41	0.74
SB-69	1.4	10	140	**2.0**	26	0.22	**360**	0.57	0.87
SB-69 (6-12")	NA	11	280	**4.0**	26	0.37	**550**	0.61	0.56
SB-70	0.78	8.0	100	1.0	20	0.11	**610**	0.46	0.61
SB-70 (6-12")	NA	9.5	110	1.4	24	0.21	**350**	0.37	0.72
Total	7.46	164	2521	26.14	415	3.54	6110	9.41	11.35
EPC	0.9	10.3	157.6	1.63	25.94	0.22	**382**	0.59	0.71
S-1 Std.	2.0	20	1000	2.0	30	100	300	400	20
EPC Tot.	**2.15**	11.3	125.7	1.82	25.02	0.21	279.5	0.62	0.65
Bkgd.(Nat.)	**NA**	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	**NA**	20	50	3	40	5	600	1	1

NA = Not Analyzed

#53 Hofmann Avenue Soil Sampling Data (mg/kg) 10/2/07 (0-6")									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-05	1.3	7.9	43	0.93	16	0.05	89	0.13	0.21
SB-06	1.3	7.2	42	0.87	16	0.05	77	0.53	0.24
SB-07	0.5	8.3	49	0.73	15	0.05	74	0.12	0.22
SB-08	0.4	7.7	40	0.59	14	0.05	54	0.40	0.21
SB-13	0.4	8.7	47	0.70	16	0.05	69	0.29	0.23
SB-14	0.6	8.2	51	0.81	17	0.05	76	0.38	0.26
SB-15	1.2	7.1	76	1.7	19	0.05	120	0.26	0.25
SB-19	0.6	11	46	0.68	18	0.05	70	0.12	0.22
SB-20	1.6	8.2	58	1.2	19	0.05	120	0.13	0.26
SB-21	**3.1**	9.4	**2200**	**2.4**	**130**	2.0	**760**	0.41	0.34
SB-21 (6-12")		9.7	340	**2.3**	**100**	1.3	**250**	.52	.27
SB-25	0.3	8.0	37	0.58	28	0.14	52	0.32	0.22
SB-26	0.4	9.8	50	0.94	17	0.12	75	0.36	0.25
SB-27	1.7	7.7	50	1.0	17	0.05	110	0.13	0.27
SB-32	2.0	14	68	1.6	21	0.15	140	0.40	0.35
SB-33	**3.4**	11	56	1.7	21	0.05	130	0.41	0.36
SB-34	1.2	11	270	**15**	28	0.31	**340**	1.6	0.52
SB-36	1.6	12	54	0.99	19	0.05	110	0.38	0.36
SB-38	1.9	17	280	**13**	27	0.14	290	1.1	0.72
Total	23.5	174.2	3517	45.4	558	4.76	3006	7.99	5.76
EPC	1.3	9.7	203	**2.5**	29.4	0.19	158	0.42	0.30
S-1 Std.	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

Former Tombarello and Sons Property
207 Marston Street
Lawrence, MA
RTN: 3-18126

MassDEP Contact:

Ms. Valerie Thompson
Environmental Analyst
Bureau of Waste Site Cleanup
MassDEP Northeast Regional Office
205B Lowell Street
Wilmington, MA 01887
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Fax: 978-694-3499

US EPA Contact:

Mr. Michael Barry
Emergency Response Team Lead
On-Scene Coordinator
US EPA New England – Region 1
One Congress Street
Boston, MA 02114
Office: 617-918-1344
Cell: 617-257-2251

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FIGURE 1
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
HOFMANN AVE

1" 1/2" 0" 1"

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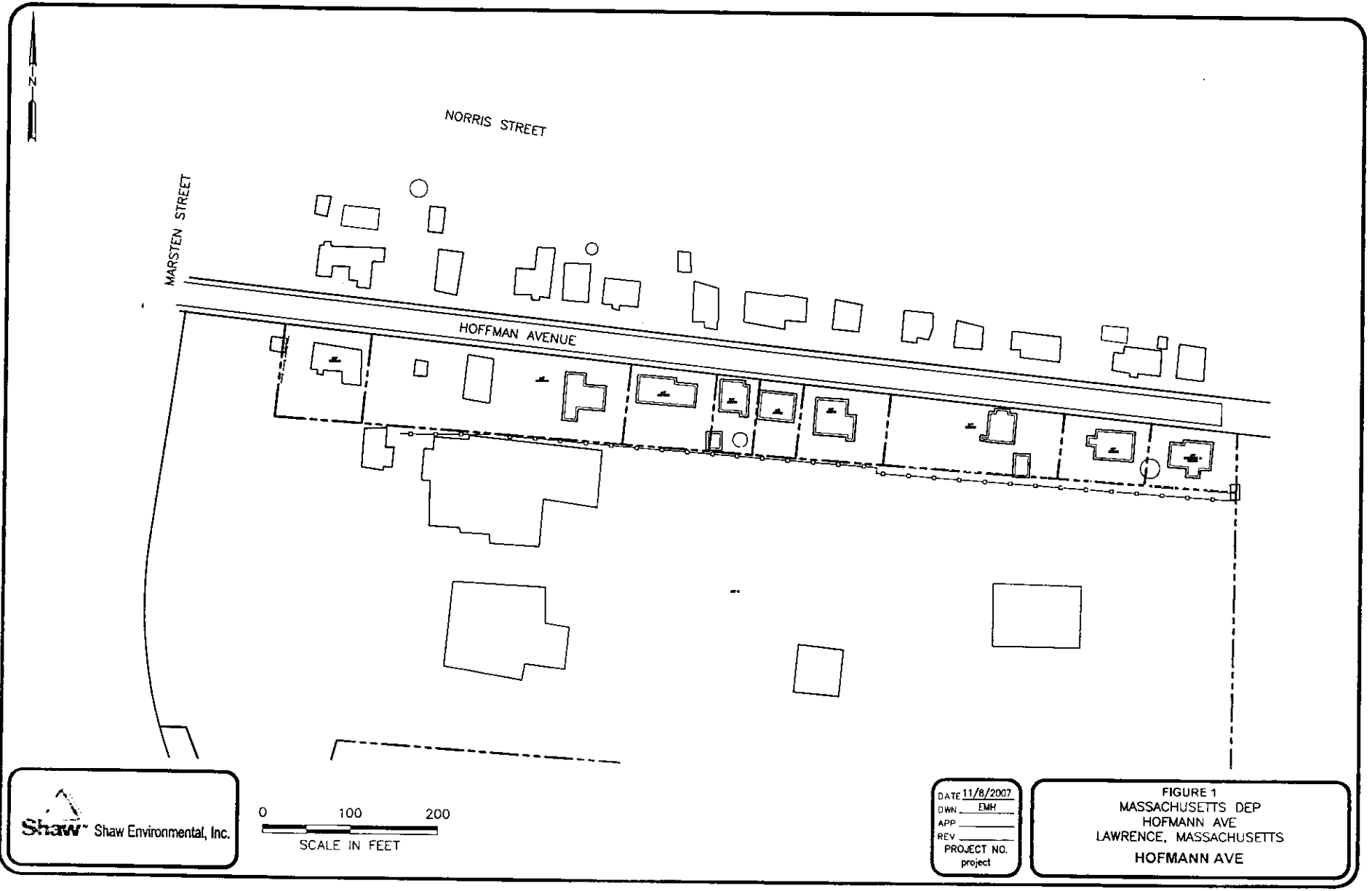

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REV
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FIGURE 1
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS

HOFMANN AVE

1" 1/2" 0" 1"

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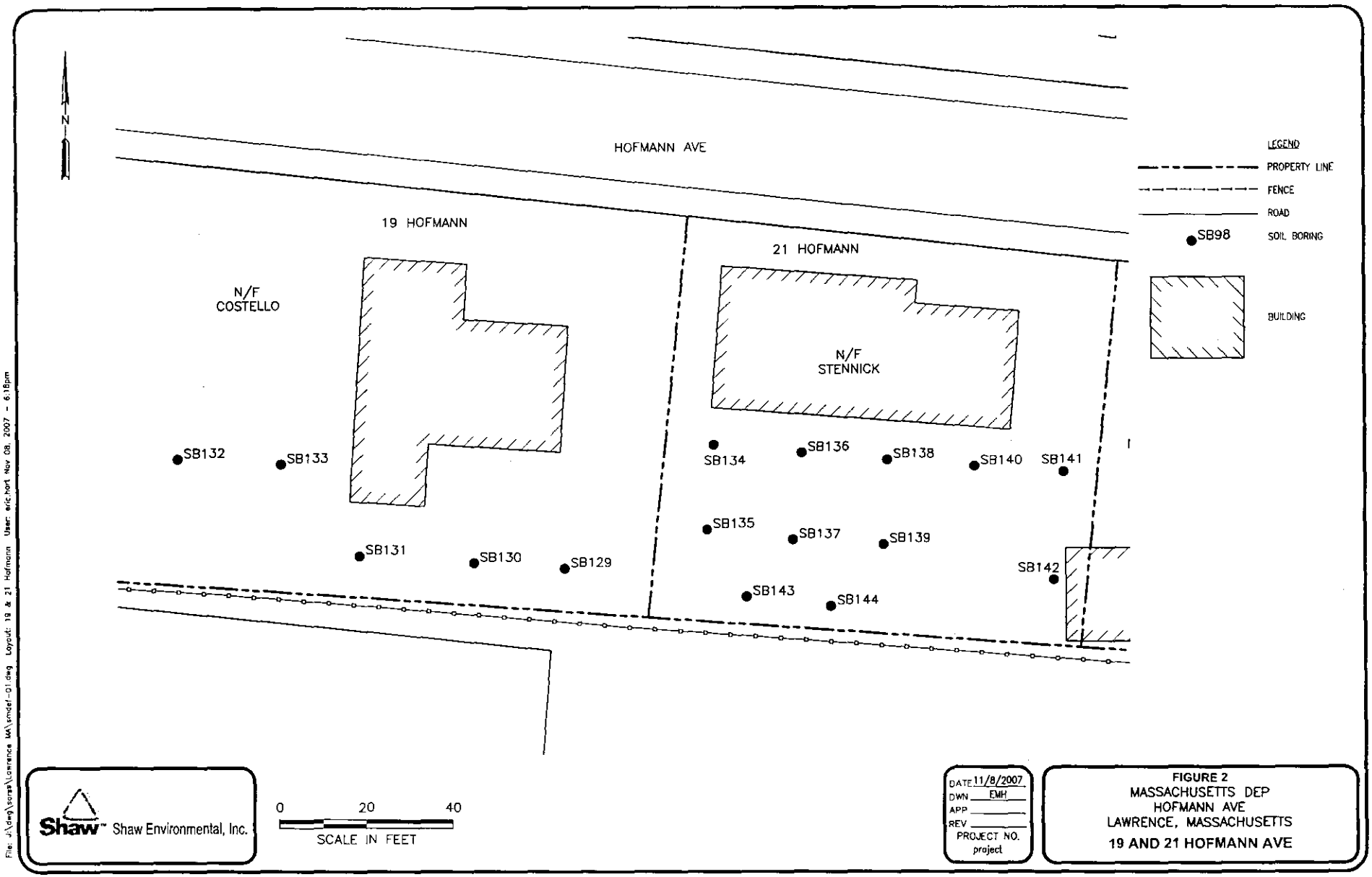

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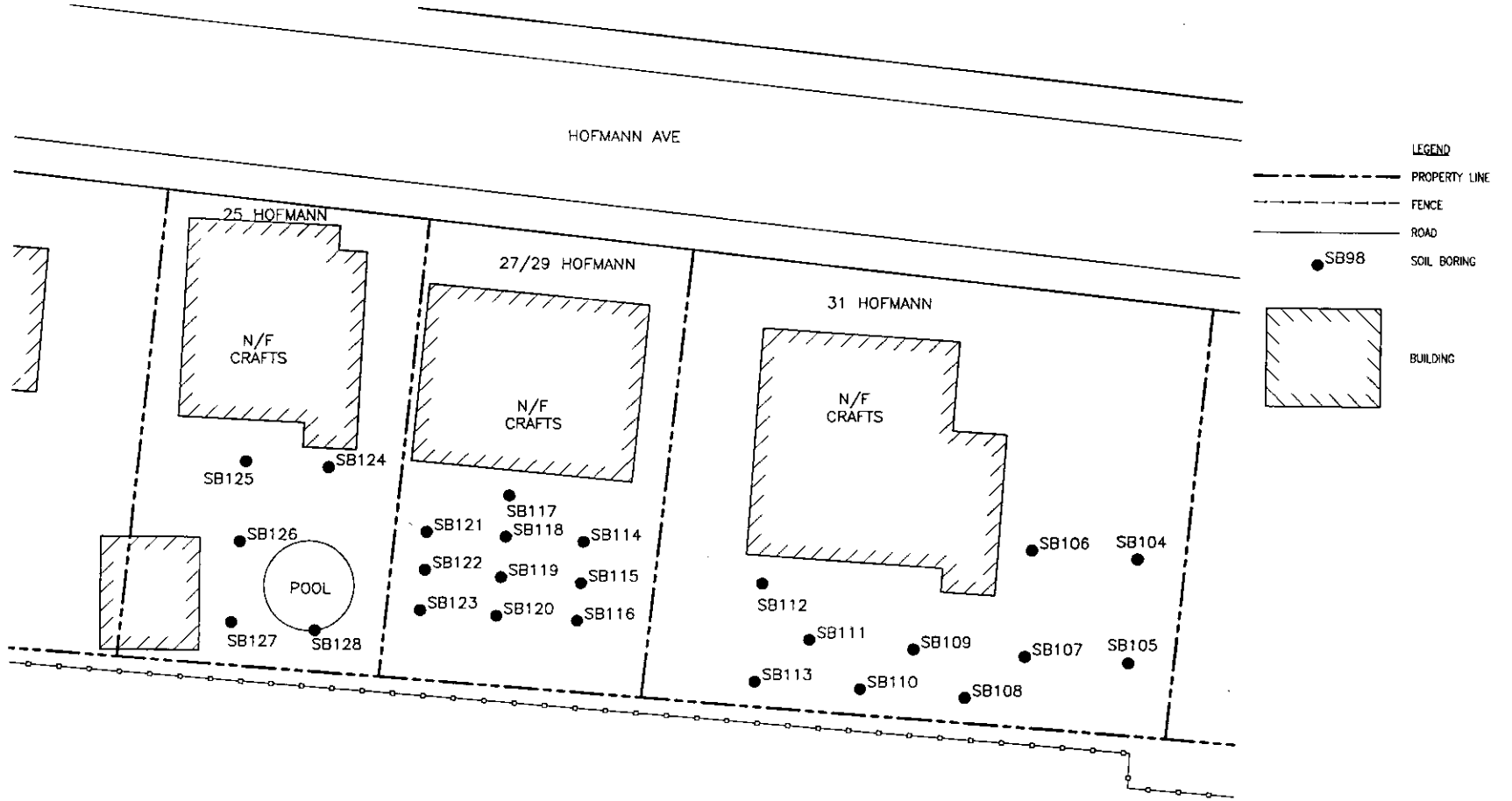
1" 1/2" 0" 1"



Shaw Environmental, Inc.

0 20 40
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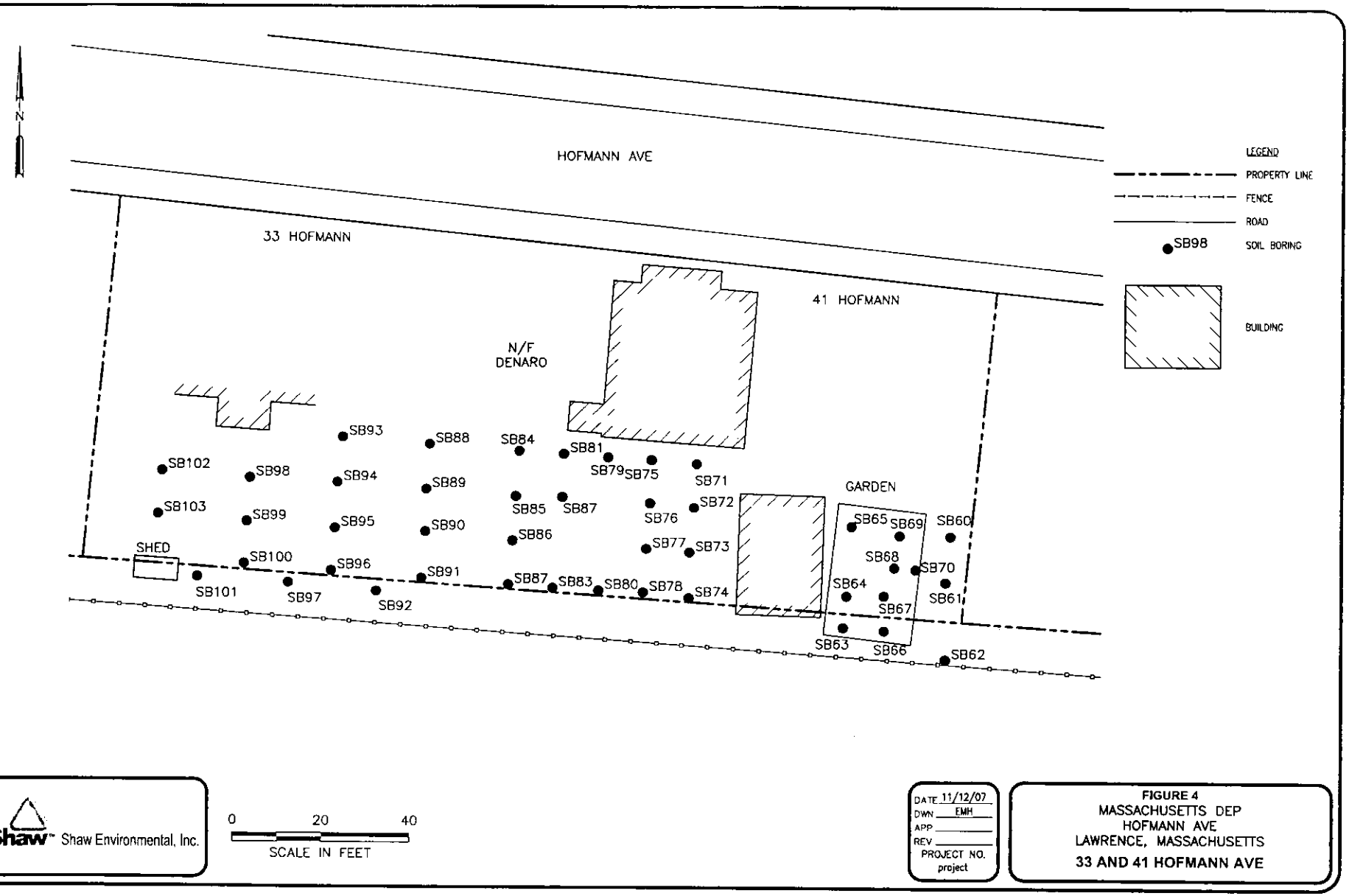
DATE 11/8/2007
DWN EMH
APP
REV
PROJECT NO. project

FIGURE 3
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
25, 27, 29 AND 31 HOFMANN AVE

1" 1/2" 0" 1"

File: J:\dwg\sersa\Lawrence MA\smdef-01.dwg Layout: 25 27 29 & 31 Hofmann User: erichart Nov 08, 2007 - 6:19pm



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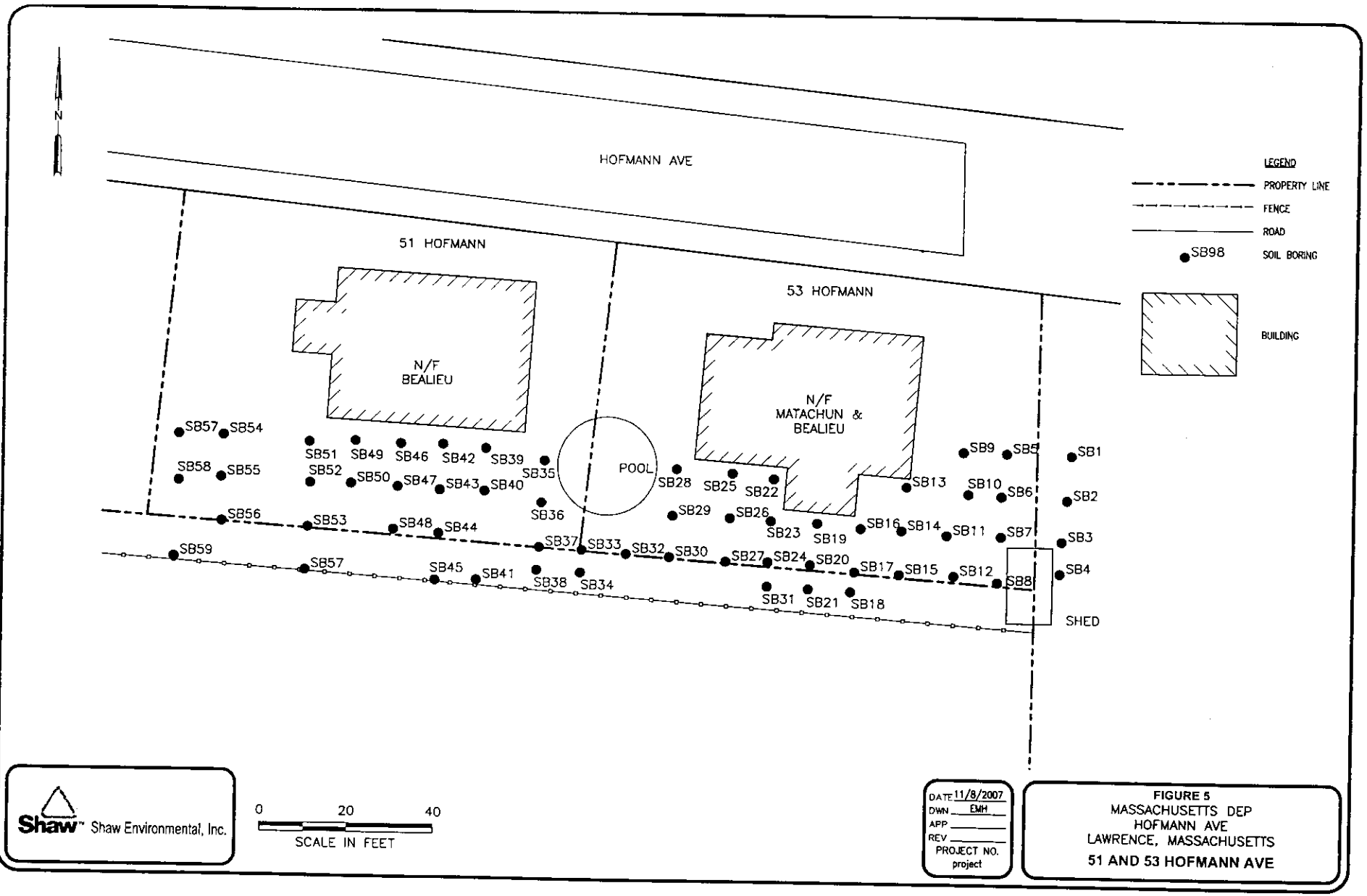
1" 1/2" 0" 1"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51 HOFMANN
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SB37 SB33 SB32 SB30
SB28 SB25 SB22
SB29 SB26 SB23 SB19
SB27 SB24 SB20
SB31 SB21 SB18
SB16 SB14 SB11 SB7
SB17 SB15 SB12 SB8
SB13
SB9 SB5
SB10 SB6
SB1
SB2
SB3
SB4
0 20 40
SCALE IN FEET
1" 1/2" 0" 1"
Shaw™ Shaw Environmental, Inc.
DATE 11/8/2007
DWN EMH
APP
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PROJECT NO.
project
FIGURE 5
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
51 AND 53 HOFMANN AVE
File: J:\dwg\sites\Lawrence MA\smdef-01.dwg Layout: 51 & 53 Hofmann User: eric.hart Nov 08, 2007 - 6:20pm

#19 Hofmann Avenue Soil Sampling Data (mg/kg) 10/5/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-129	.80	31	140	1.7	**40**	.25	170	.70	.51
SB-130	.49	11	110	1.4	27	2.7	170	.70	.31
SB-131	.64	11	90	1.4	28	.30	210	.75	.36
SB-132	1.3	9.9	68	1.1	24	.30	220	.75	.33
SB-133	.19	11	37	1.1	**37**	.26	88	.70	.17
Total	3.42	73.9	445	6.7	156	3.81	858	3.6	1.68
EPC	.68	14.8	89	1.34	**31.2**	.76	171.6	.72	.34
S-1	2.0	20	1000	2.0	**30**	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#21 Hofmann Avenue Soil Sampling Data (mg/kg) 10/5/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-134	1.2	9.3	50	.85	21	.27	91	.75	.30
SB-135	1.5	12	77	1.3	27	1.8	230	.75	.37
SB-136	1.6	11	50	.95	21	.27	130	.70	.35
SB-137	1.9	12	62	1.0	23	.26	150	.70	.36
SB-138	.92	19	44	.98	22	.25	91	.70	.26
SB-139	.38	10	50	.96	25	.27	83	.70	.20
SB-140	.95	16	52	.88	**34**	.29	79	.75	.14
SB-141	1.4	12	50	.98	25	.29	100	.70	.24
SB-142	3.8	13	71	1.5	23	.27	**320**	.70	.90
SB-143	**2.4**	9.2	75	**2.3**	27	.27	180	.70	.44
SB-144	4.1	11	76	**2.2**	26	.27	220	.70	.43
Total	20.15	134.5	657	13.9	274	4.51	1524	7.85	3.99
EPC	1.83	12.2	59.7	1.26	24.91	.41	138.5	.71	.36
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#25 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-124	.97	12	56	.72	22	.25	120	.70	.22
SB-125	.92	12	120	1.8	30	.25	**380**	.60	.38
SB-126	1.5	14	240	**3.5**	24	.27	**600**	.70	.43
SB-127	.96	13	97	1.5	27	.29	160	.75	.46
SB-128	.71	12	100	1.6	27	.27	240	.70	.43
Total	5.06	63	613	9.12	130	1.33	1500	3.45	2.06
EPC	1.01	12.6	122.6	1.8	26	.27	300	.69	.41
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#27/29 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-114	.29	12	64	1.2	24	.25	130	.60	.22
SB-115	.25	10	44	.96	28	.25	71	.70	.21
SB-116	.71	20	79	1.1	24	.25	150	.70	.40
SB-117	.11	6.7	32	.58	19	.25	35	.70	.079
SB-118	.19	10	43	.70	23	.27	77	.70	.16
SB-119	.22	8.5	42	.61	20	.25	83	.70	.23
SB-120	.39	15	45	.65	20	.27	78	.70	.25
SB-121	.34	15	52	.80	29	.25	81	.70	.14
SB-122	.43	21	42	.93	**34**	.27	70	.70	.22
SB-123	.64	17	51	.78	24	.25	110	.70	.27
Total	3.57	125.2	494	8.31	245	2.56	885	6.9	2.18
EPC	.36	12.5	49.4	.83	24.5	.26	88.5	.69	.22
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#31 Hofmann Avenue Soil Sampling Data 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-104	.57	7.7	53	.77	26	.27	100	.70	.20
SB-105	1.7	15	81	1.5	28	.26	210	.70	.40
SB-106	.71	8.6	66	.98	24	.26	170	.70	.32
SB-107	2.0	12	79	1.4	31	.26	220	.70	.34
SB-108	.80	9.9	60	1.0	26	.25	180	.60	.32
SB-109	.37	9.7	82	.80	24	.27	170	.70	.18
SB-110	3.0	11	81	1.7	31	.25	220	.60	.40
SB-111	.19	8.0	49	.58	24	.25	73	.70	.10
SB-112	.27	7.6	43	.78	25	.27	72	.70	.15
SB-113	1.2	9.7	62	1.1	26	.26	170	.70	.54
Total	9.81	99.2	656	10.61	265	2.6	1755	6.8	2.95
EPC	.98	9.92	65.6	1.06	26.5	.26	175.5	.68	.30
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#33 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-84	.69	9.0	160	1.7	20	.26	290	.76	.33
SB-85	.57	11	95	0.93	24	.35	230	.75	.30
SB-86	.33	9.4	82	.82	23	.28	180	1.4	.19
SB-87	.60	9.9	91	.97	27	.28	260	.70	.25
SB-88	.54	10	120	1.1	28	.33	280	.53	.75
SB-89	.063	6.9	45	.31	32	.28	53	.72	.071
SB-90	.46	11	83	.85	23	.27	230	.72	.41
SB-91	.009	7.4	45	.29	26	.27	42	.72	.056
SB-92	1.0	9.5	83	.98	22	.27	230	.72	.27
SB-93	.025	7.1	43	.27	24	.24	35	.51	.049
SB-94	.009	6.9	45	.28	25	.26	50	.72	.075
SB-95	.16	10	64	.26	24	.24	100	.72	.11
SB-96	.77	9.9	100	1.1	23	.24	260	.75	.26
SB-97	.009	7.3	43	.26	27	.26	31	.70	.068
SB-98	.092	8.7	66	.72	23	.27	200	.72	.17
SB-99	.012	6.9	48	.34	26	.27	33	.70	.077
SB-100	.087	6.6	53	.37	20	.25	68	.70	.093
SB-101	.019	6.8	48	.40	25	.23	55	.60	.074
SB-102	.14	9.7	67	.65	30	.27	120	.70	.18
SB-103	.009	6.9	44	.31	27	.25	50	.70	.077
Total	5.6	161	1425	12.91	499	5.37	3329	14.54	3.86
EPC	.28	8.05	71.25	0.65	24.95	.27	166	.73	.19
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#41Hofmann Avenue Soil Sampling Data (mg/kg) 10/3/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-71	1.5	8.9	100	1.5	22	0.19	**470**	0.15	1.3
SB-72	**3.4**	14	120	1.8	26	0.16	**530**	1.8	0.63
SB-73	**4.4**	12	250	6.0	**31**	0.29	**510**	1.2	0.71
SB-74	1.5	**20**	**1400**	**30**	**71**	0.53	**1300**	0.7	1.0
SB-75	1.2	9.0	110	1.6	24	0.6	**510**	0.68	0.52
SB-76	**4.2**	**57**	200	3.4	27	0.36	**1000**	1.1	0.89
SB-77	**4.6**	12	140	2.5	**33**	0.26	**510**	0.68	0.58
SB-78	1.3	17	330	6.1	27	0.11	**300**	0.84	0.44
SB-79	.78	10	130	1.7	19	0.21	**1000**	0.48	0.46
SB-80	**2.6**	17	200	3.7	28	0.29	**560**	0.7	0.52
SB-81	.40	11	100	1.2	24	0.29	**400**	0.7	0.46
SB-82	.32	11	52	0.48	20	0.24	110	0.6	0.16
SB-83	.58	17	290	**2.5**	27	0.24	220	0.6	1.6
Total	26.8	216	3422	62.5	379	3.77	7420	10.23	9.27
EPC	**2.1**	16.6	263	**4.8**	29.2	0.3	**571**	0.79	0.7
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#51Hofmann Avenue Soil Sampling Data (mg/kg)10/2/07 (0-6")									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-32	**2.0**	14	68	1.6	21	0.15	140	0.40	0.35
SB-33	**3.4**	11	56	1.7	21	0.05	130	0.41	0.36
SB-34	1.2	11	270	**15**	28	0.31	**340**	1.6	0.52
SB-36	1.6	12	54	0.99	19	0.05	110	0.38	0.36
SB-38	1.9	17	280	**13**	27	0.14	290	1.1	0.72
SB-39	1.1	9.7	51	0.89	26	0.11	91	0.13	0.66
SB-40	1.6	10	49	0.92	17	0.05	92	0.34	0.26
SB-41	**22.0**	14	180	**3.6**	**47**	0.24	**300**	0.30	0.71
SB-41 (6-12")	**5.1**	8.6	65	1.3	18	.55	76	.44	.31
SB-42	1.0	9.5	57	0.95	23	0.21	100	0.7	0.05
SB-43	1.9	13	65	1.3	24	0.24	130	0.75	0.31
SB-44	3.3	14	77	1.6	26	0.26	170	0.7	0.33
SB-45	**10.0**	**23**	180	**3.4**	**42**	0.29	**370**	0.75	0.61
SB-45 (6-12")	**1.6**	13	58	.94	18	.06	83	.47	.22
SB-49	1.5	12	64	1.2	24	0.29	140	0.75	0.26
SB-50	**2.0**	11	65	1.5	24	0.26	140	0.7	0.32
SB-54	1.5	11	57	1.1	24	0.26	120	0.7	0.24
SB-55	**2.0**	14	65	1.3	23	0.27	160	0.7	0.33
SB-56	**2.0**	14	110	1.4	**32**	0.25	**330**	0.7	0.39
SB-57	1.2	14	56	1.1	22	0.27	180	0.7	0.33
SB-58	1.8	13	67	1.3	24	0.29	170	0.75	0.33
SB-59	**5.7**	15	160	**2.9**	25	0.26	**410**	0.7	0.53
Total	75.4	284	2154	46.0	555	4.9	4072	14.64	13.23
EPC	**3.3**	12.3	93.7	**2.00**	24.1	0.21	177	0.64	0.58
S-1	2.0	20	1000	2.0	30	100	300	400	20
GARDEN	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-63	0.87	11	130	1.3	29	0.29	**370**	0.75	0.61
SB-63 (6-12")	NA	9.4	89	0.78	20	0.11	220	0.40	0.77
SB-64	0.83	11	150	1.4	**30**	0.25	**370**	0.7	0.53
SB-64 (6-12")	NA	9.6	120	0.96	22	0.13	**300**	0.58	0.77
SB-65	0.75	13	190	**2.6**	**32**	0.26	**470**	0.7	0.78
SB-65 (6-12")	NA	11	180	**2.7**	23	0.32	**500**	0.84	0.68
SB-66	1.2	12	130	1.3	29	0.29	**340**	0.7	0.78
SB-66 (6-12")	NA	13	82	1.1	21	0.05	200	0.39	0.59
SB-67	0.79	13	170	1.6	**31**	0.29	**400**	0.75	0.84
SB-67	NA	12	140	1.3	22	0.19	**310**	0.43	0.83

(6-12")									
GARDEN	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-68	0.84	12	390	1.5	**35**	0.30	**410**	0.75	0.67
SB-68 (6-12")	NA	9.3	120	1.2	25	0.15	**350**	0.41	0.74
SB-69	1.4	10	140	**2.0**	26	0.22	**360**	0.57	0.87
SB-69 (6-12")	NA	11	280	**4.0**	26	0.37	**550**	0.61	0.56
SB-70	0.78	8.0	100	1.0	20	0.11	**610**	0.46	0.61
SB-70 (6-12")	NA	9.5	110	1.4	24	0.21	**350**	0.37	0.72
Total	7.46	164	2521	26.14	415	3.54	6110	9.41	11.35
EPC	0.9	10.3	157.6	1.63	25.94	0.22	**382**	0.59	0.71
S-1 Std.	2.0	20	1000	2.0	30	100	300	400	20
EPC Tot.	**2.15**	11.3	125.7	1.82	25.02	0.21	279.5	0.62	0.65
Bkgd.(Nat.)	**NA**	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	**NA**	20	50	3	40	5	600	1	1

NA = Not Analyzed

#53 Hofmann Avenue Soil Sampling Data (mg/kg) 10/2/07 (0-6")									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-05	1.3	7.9	43	0.93	16	0.05	89	0.13	0.21
SB-06	1.3	7.2	42	0.87	16	0.05	77	0.53	0.24
SB-07	0.5	8.3	49	0.73	15	0.05	74	0.12	0.22
SB-08	0.4	7.7	40	0.59	14	0.05	54	0.40	0.21
SB-13	0.4	8.7	47	0.70	16	0.05	69	0.29	0.23
SB-14	0.6	8.2	51	0.81	17	0.05	76	0.38	0.26
SB-15	1.2	7.1	76	1.7	19	0.05	120	0.26	0.25
SB-19	0.6	11	46	0.68	18	0.05	70	0.12	0.22
SB-20	1.6	8.2	58	1.2	19	0.05	120	0.13	0.26
SB-21	**3.1**	9.4	**2200**	**2.4**	**130**	2.0	**760**	0.41	0.34
SB-21 (6-12")		9.7	340	**2.3**	**100**	1.3	**250**	.52	.27
SB-25	0.3	8.0	37	0.58	28	0.14	52	0.32	0.22
SB-26	0.4	9.8	50	0.94	17	0.12	75	0.36	0.25
SB-27	1.7	7.7	50	1.0	17	0.05	110	0.13	0.27
SB-32	2.0	14	68	1.6	21	0.15	140	0.40	0.35
SB-33	**3.4**	11	56	1.7	21	0.05	130	0.41	0.36
SB-34	1.2	11	270	**15**	28	0.31	**340**	1.6	0.52
SB-36	1.6	12	54	0.99	19	0.05	110	0.38	0.36
SB-38	1.9	17	280	**13**	27	0.14	290	1.1	0.72
Total	23.5	174.2	3517	45.4	558	4.76	3006	7.99	5.76
EPC	1.3	9.7	203	**2.5**	29.4	0.19	158	0.42	0.30
S-1 Std.	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

Former Tombarello and Sons Property
207 Marston Street
Lawrence, MA
RTN: 3-18126

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Environmental Analyst
Bureau of Waste Site Cleanup
MassDEP Northeast Regional Office
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Fax: 978-694-3499

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On-Scene Coordinator
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One Congress Street
Boston, MA 02114
Office: 617-918-1344
Cell: 617-257-2251

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FIGURE 1
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
HOFMANN AVE

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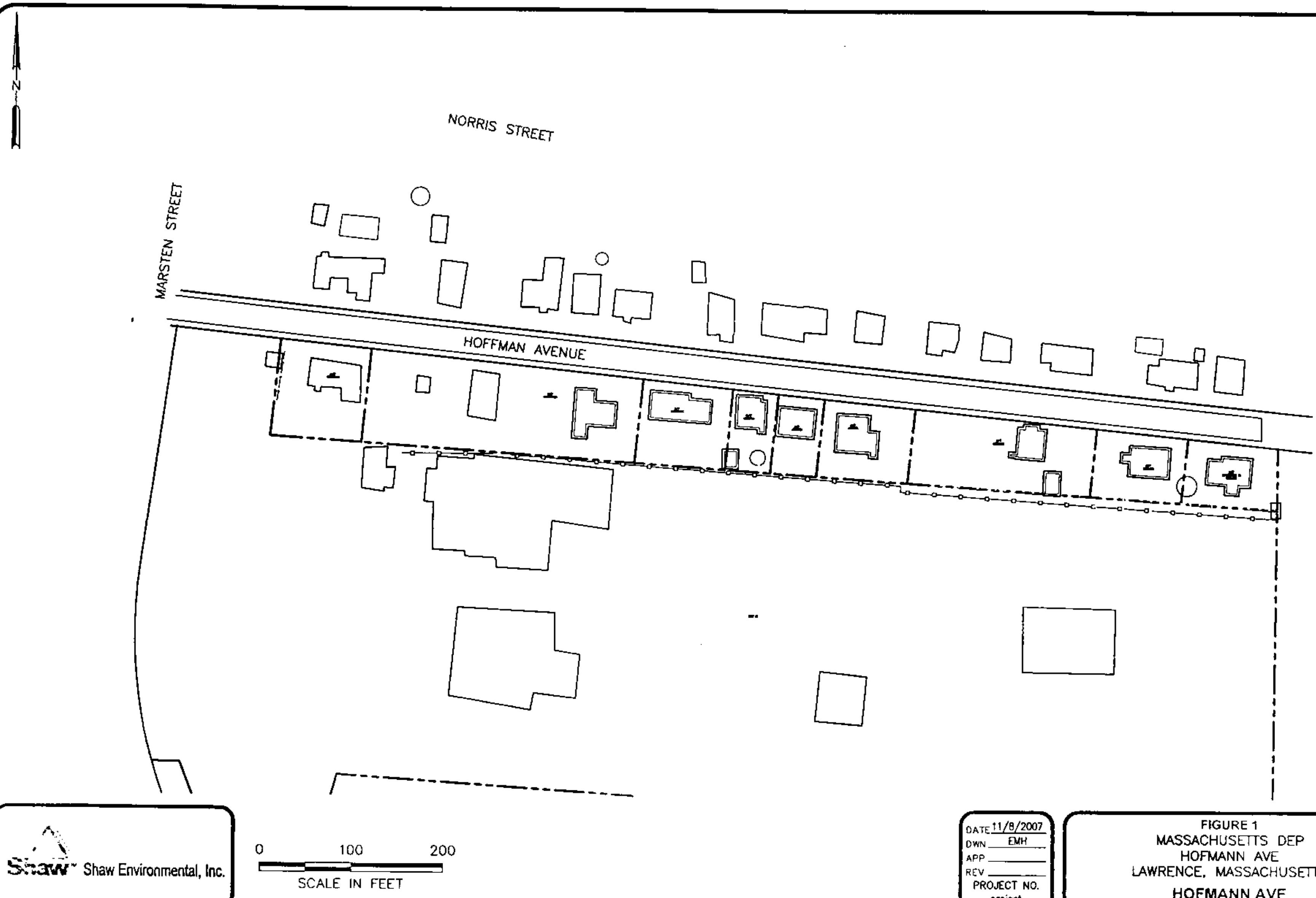

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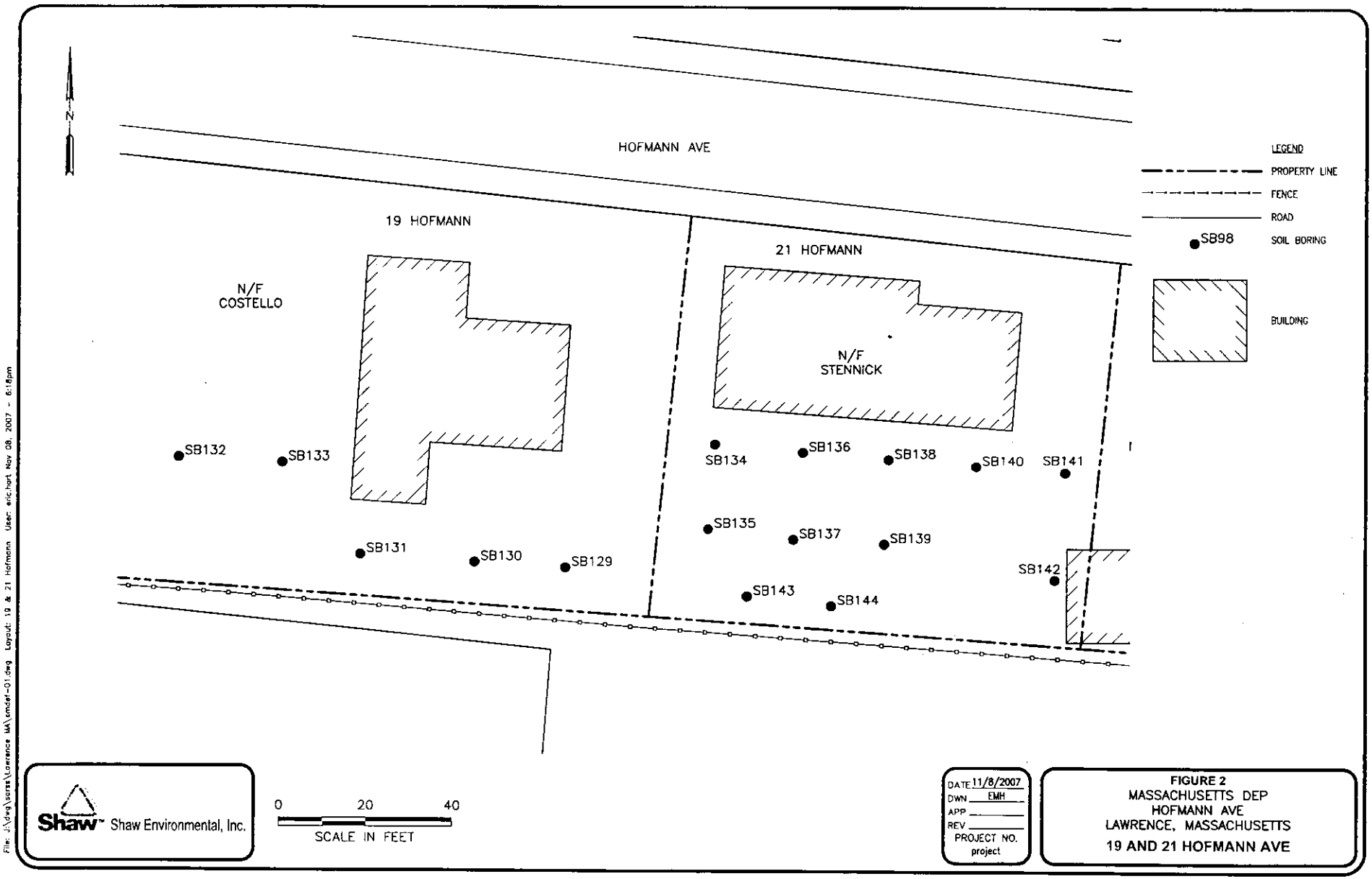
FIGURE 1
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
HOFMANN AVE

File: J:\dwg\sorss\Lawrence MA\smdef-01.dwg Layout: Layout1 User: eric.hart Nov 08, 2007 - 6:13pm



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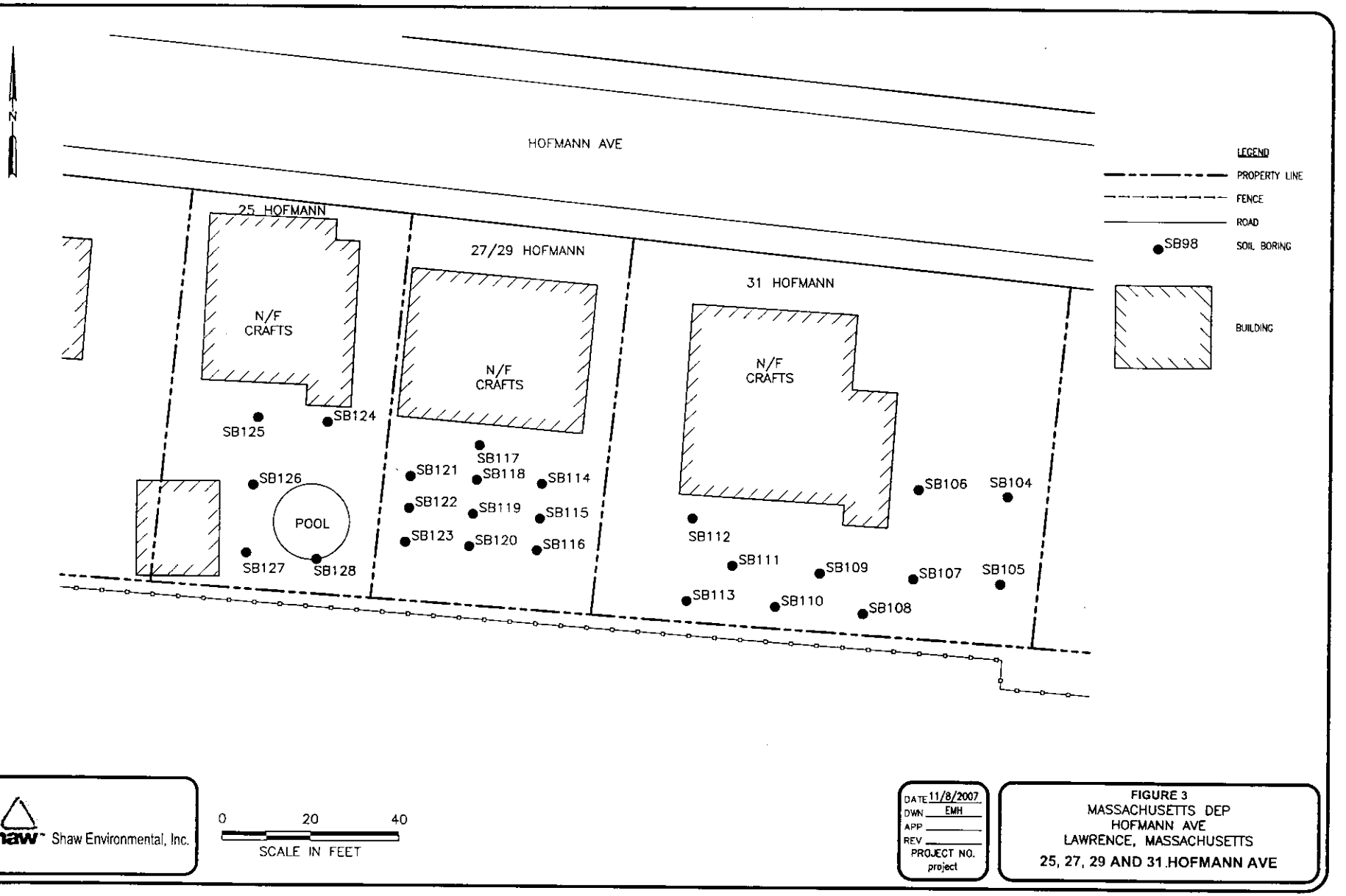
project

FIGURE 2
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
19 AND 21 HOFMANN AVE

1" 1/2" 0" 1"

File: J:\dwg\sorse\Lawrence MA\sendaf-01.dwg Layout: 19 & 21 Hofmann User: eric.hart Nov 08, 2007 - 6:18pm



Shaw Shaw Environmental, Inc.

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DWN EMH
APP
REV
PROJECT NO. project

FIGURE 3
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
25, 27, 29 AND 31 HOFMANN AVE

1" 1/2" 0" 1"

File: J:\dwg\acrsa\Lawrence MA\pmdef-01.dwg Layout: 25 27 29 & 31 Hofmann User: eric.hart Nov 08, 2007 - 6:19pm

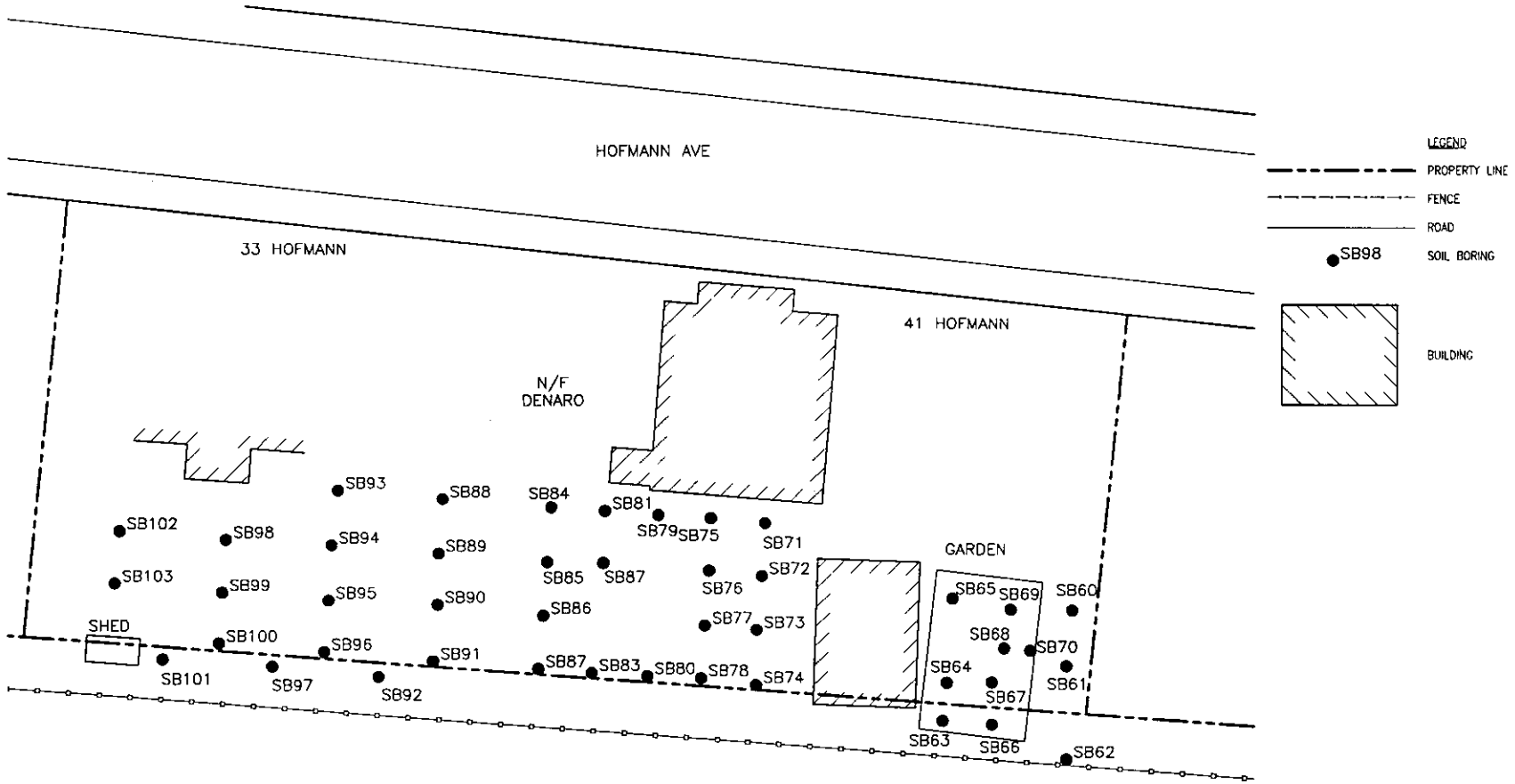

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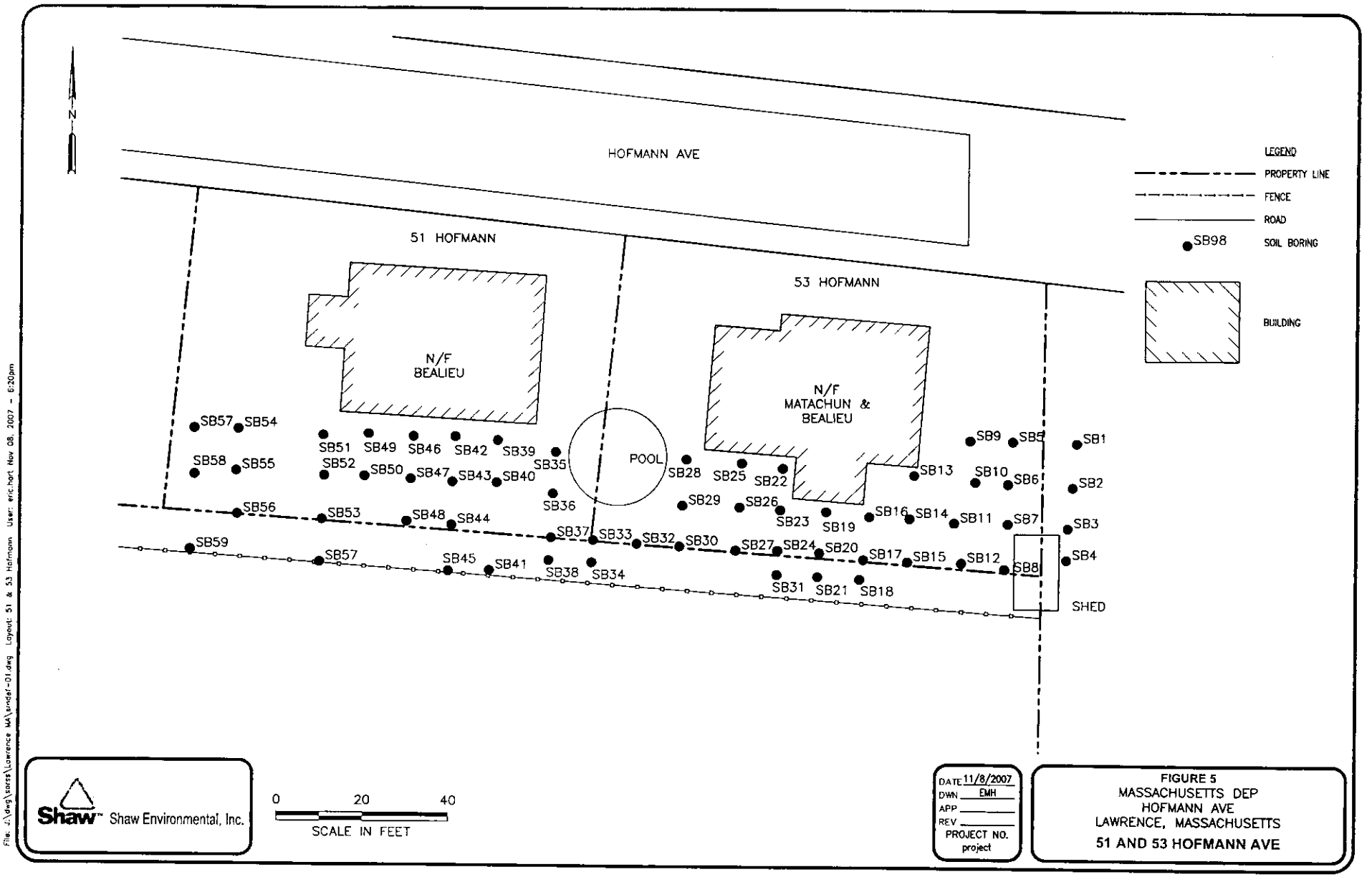
FIGURE 4
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
33 AND 41 HOFMANN AVE

1" 1/2" 0" 1"

File: J:\dwg\sprs\Lawrence MA\smdef-01.dwg Layout: 33 & 41 Hofmann User: eric.hart Nov 12, 2007 - 2:03pm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HOFMANN AVE
51 HOFMANN
53 HOFMANN
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BEALIEU
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PROPERTY LINE
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SB59
SB51 SB49 SB46 SB42 SB39 SB35
SB52 SB50 SB47 SB43 SB40 SB36
SB53 SB48 SB44
SB57 SB45 SB41 SB38 SB34
SB37 SB33 SB32 SB30
SB29 SB28 SB25 SB22
SB26 SB23
SB27 SB24 SB20 SB19
SB31 SB21 SB18
SB17 SB16 SB15 SB14 SB12 SB11
SB13
SB9 SB8 SB7
SB10 SB6
SB1
SB2
SB3
SB4
0 20 40
SCALE IN FEET
1" 1/2" 0" 1"
Shaw Shaw Environmental, Inc.
DATE 11/8/2007
DWN EMH
APP
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PROJECT NO.
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FIGURE 5
MASSACHUSETTS DEP
HOFMANN AVE
LAWRENCE, MASSACHUSETTS
51 AND 53 HOFMANN AVE
File: J:\dwg\sarss\Lawrence MA\sandef-01.dwg Layout: 51 & 53 Hofmann User: eric.hart Nov 08, 2007 - 6:20pm

#19 Hofmann Avenue Soil Sampling Data (mg/kg) 10/5/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-129	.80	31	140	1.7	**40**	.25	170	.70	.51
SB-130	.49	11	110	1.4	27	2.7	170	.70	.31
SB-131	.64	11	90	1.4	28	.30	210	.75	.36
SB-132	1.3	9.9	68	1.1	24	.30	220	.75	.33
SB-133	.19	11	37	1.1	**37**	.26	88	.70	.17
Total	3.42	73.9	445	6.7	156	3.81	858	3.6	1.68
EPC	.68	14.8	89	1.34	**31.2**	.76	171.6	.72	.34
S-1	2.0	20	1000	2.0	**30**	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#21 Hofmann Avenue Soil Sampling Data (mg/kg) 10/5/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-134	1.2	9.3	50	.85	21	.27	91	.75	.30
SB-135	1.5	12	77	1.3	27	1.8	230	.75	.37
SB-136	1.6	11	50	.95	21	.27	130	.70	.35
SB-137	1.9	12	62	1.0	23	.26	150	.70	.36
SB-138	.92	19	44	.98	22	.25	91	.70	.26
SB-139	.38	10	50	.96	25	.27	83	.70	.20
SB-140	.95	16	52	.88	**34**	.29	79	.75	.14
SB-141	1.4	12	50	.98	25	.29	100	.70	.24
SB-142	3.8	13	71	1.5	23	.27	**320**	.70	.90
SB-143	**2.4**	9.2	75	**2.3**	27	.27	180	.70	.44
SB-144	4.1	11	76	**2.2**	26	.27	220	.70	.43
Total	20.15	134.5	657	13.9	274	4.51	1524	7.85	3.99
EPC	1.83	12.2	59.7	1.26	24.91	.41	138.5	.71	.36
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#25 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-124	.97	12	56	.72	22	.25	120	.70	.22
SB-125	.92	12	120	1.8	30	.25	**380**	.60	.38
SB-126	1.5	14	240	**3.5**	24	.27	**600**	.70	.43
SB-127	.96	13	97	1.5	27	.29	160	.75	.46
SB-128	.71	12	100	1.6	27	.27	240	.70	.43
Total	5.06	63	613	9.12	130	1.33	1500	3.45	2.06
EPC	1.01	12.6	122.6	1.8	26	.27	300	.69	.41
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#27/29 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-114	.29	12	64	1.2	24	.25	130	.60	.22
SB-115	.25	10	44	.96	28	.25	71	.70	.21
SB-116	.71	20	79	1.1	24	.25	150	.70	.40
SB-117	.11	6.7	32	.58	19	.25	35	.70	.079
SB-118	.19	10	43	.70	23	.27	77	.70	.16
SB-119	.22	8.5	42	.61	20	.25	83	.70	.23
SB-120	.39	15	45	.65	20	.27	78	.70	.25
SB-121	.34	15	52	.80	29	.25	81	.70	.14
SB-122	.43	21	42	.93	**34**	.27	70	.70	.22
SB-123	.64	17	51	.78	24	.25	110	.70	.27
Total	3.57	125.2	494	8.31	245	2.56	885	6.9	2.18
EPC	.36	12.5	49.4	.83	24.5	.26	88.5	.69	.22
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#31 Hofmann Avenue Soil Sampling Data 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-104	.57	7.7	53	.77	26	.27	100	.70	.20
SB-105	1.7	15	81	1.5	28	.26	210	.70	.40
SB-106	.71	8.6	66	.98	24	.26	170	.70	.32
SB-107	2.0	12	79	1.4	31	.26	220	.70	.34
SB-108	.80	9.9	60	1.0	26	.25	180	.60	.32
SB-109	.37	9.7	82	.80	24	.27	170	.70	.18
SB-110	3.0	11	81	1.7	31	.25	220	.60	.40
SB-111	.19	8.0	49	.58	24	.25	73	.70	.10
SB-112	.27	7.6	43	.78	25	.27	72	.70	.15
SB-113	1.2	9.7	62	1.1	26	.26	170	.70	.54
Total	9.81	99.2	656	10.61	265	2.6	1755	6.8	2.95
EPC	.98	9.92	65.6	1.06	26.5	.26	175.5	.68	.30
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#33 Hofmann Avenue Soil Sampling Data (mg/kg) 10/4/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-84	.69	9.0	160	1.7	20	.26	290	.76	.33
SB-85	.57	11	95	0.93	24	.35	230	.75	.30
SB-86	.33	9.4	82	.82	23	.28	180	1.4	.19
SB-87	.60	9.9	91	.97	27	.28	260	.70	.25
SB-88	.54	10	120	1.1	28	.33	280	.53	.75
SB-89	.063	6.9	45	.31	32	.28	53	.72	.071
SB-90	.46	11	83	.85	23	.27	230	.72	.41
SB-91	.009	7.4	45	.29	26	.27	42	.72	.056
SB-92	1.0	9.5	83	.98	22	.27	230	.72	.27
SB-93	.025	7.1	43	.27	24	.24	35	.51	.049
SB-94	.009	6.9	45	.28	25	.26	50	.72	.075
SB-95	.16	10	64	.26	24	.24	100	.72	.11
SB-96	.77	9.9	100	1.1	23	.24	260	.75	.26
SB-97	.009	7.3	43	.26	27	.26	31	.70	.068
SB-98	.092	8.7	66	.72	23	.27	200	.72	.17
SB-99	.012	6.9	48	.34	26	.27	33	.70	.077
SB-100	.087	6.6	53	.37	20	.25	68	.70	.093
SB-101	.019	6.8	48	.40	25	.23	55	.60	.074
SB-102	.14	9.7	67	.65	30	.27	120	.70	.18
SB-103	.009	6.9	44	.31	27	.25	50	.70	.077
Total	5.6	161	1425	12.91	499	5.37	3329	14.54	3.86
EPC	.28	8.05	71.25	0.65	24.95	.27	166	.73	.19
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#41Hofmann Avenue Soil Sampling Data (mg/kg) 10/3/07									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-71	1.5	8.9	100	1.5	22	0.19	**470**	0.15	1.3
SB-72	**3.4**	14	120	1.8	26	0.16	**530**	1.8	0.63
SB-73	**4.4**	12	250	6.0	**31**	0.29	**510**	1.2	0.71
SB-74	1.5	**20**	**1400**	**30**	**71**	0.53	**1300**	0.7	1.0
SB-75	1.2	9.0	110	1.6	24	0.6	**510**	0.68	0.52
SB-76	**4.2**	**57**	200	3.4	27	0.36	**1000**	1.1	0.89
SB-77	**4.6**	12	140	2.5	**33**	0.26	**510**	0.68	0.58
SB-78	1.3	17	330	6.1	27	0.11	**300**	0.84	0.44
SB-79	.78	10	130	1.7	19	0.21	**1000**	0.48	0.46
SB-80	**2.6**	17	200	3.7	28	0.29	**560**	0.7	0.52
SB-81	.40	11	100	1.2	24	0.29	**400**	0.7	0.46
SB-82	.32	11	52	0.48	20	0.24	110	0.6	0.16
SB-83	.58	17	290	**2.5**	27	0.24	220	0.6	1.6
Total	26.8	216	3422	62.5	379	3.77	7420	10.23	9.27
EPC	**2.1**	16.6	263	**4.8**	29.2	0.3	**571**	0.79	0.7
S-1	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

#51Hofmann Avenue Soil Sampling Data (mg/kg)10/2/07 (0-6")									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-32	**2.0**	14	68	1.6	21	0.15	140	0.40	0.35
SB-33	**3.4**	11	56	1.7	21	0.05	130	0.41	0.36
SB-34	1.2	11	270	**15**	28	0.31	**340**	1.6	0.52
SB-36	1.6	12	54	0.99	**19**	0.05	110	0.38	0.36
SB-38	1.9	17	280	**13**	27	0.14	290	1.1	0.72
SB-39	1.1	9.7	51	0.89	26	0.11	91	0.13	0.66
SB-40	1.6	10	49	0.92	17	0.05	92	0.34	0.26
SB-41	**22.0**	14	180	**3.6**	**47**	0.24	**300**	0.30	0.71
SB-41 (6-12")	**5.1**	8.6	65	1.3	18	.55	76	.44	.31
SB-42	1.0	9.5	57	0.95	23	0.21	100	0.7	0.05
SB-43	1.9	13	65	1.3	24	0.24	130	0.75	0.31
SB-44	3.3	14	77	1.6	26	0.26	170	0.7	0.33
SB-45	**10.0**	**23**	180	**3.4**	**42**	0.29	**370**	0.75	0.61
SB-45 (6-12")	**1.6**	13	58	.94	18	.06	83	.47	.22
SB-49	1.5	12	64	1.2	24	0.29	140	0.75	0.26
SB-50	**2.0**	11	65	1.5	24	0.26	140	0.7	0.32
SB-54	1.5	11	57	1.1	24	0.26	120	0.7	0.24
SB-55	**2.0**	14	65	1.3	23	0.27	160	0.7	0.33
SB-56	**2.0**	14	110	1.4	**32**	0.25	**330**	0.7	0.39
SB-57	1.2	14	56	1.1	22	0.27	180	0.7	0.33
SB-58	1.8	13	67	1.3	24	0.29	170	0.75	0.33
SB-59	**5.7**	15	160	**2.9**	25	0.26	**410**	0.7	0.53
Total	75.4	284	2154	46.0	555	4.9	4072	14.64	13.23
EPC	**3.3**	12.3	93.7	**2.00**	24.1	0.21	177	0.64	0.58
S-1	2.0	20	1000	2.0	30	100	300	400	20
GARDEN	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-63	0.87	11	130	1.3	29	0.29	**370**	0.75	0.61
SB-63 (6-12")	NA	9.4	89	0.78	20	0.11	220	0.40	0.77
SB-64	0.83	11	150	1.4	**30**	0.25	**370**	0.7	0.53
SB-64 (6-12")	NA	9.6	120	0.96	22	0.13	**300**	0.58	0.77
SB-65	0.75	13	190	**2.6**	**32**	0.26	**470**	0.7	0.78
SB-65 (6-12")	NA	11	180	**2.7**	23	0.32	**500**	0.84	0.68
SB-66	1.2	12	130	1.3	29	0.29	**340**	0.7	0.78
SB-66 (6-12")	NA	13	82	1.1	21	0.05	200	0.39	0.59
SB-67	0.79	13	170	1.6	**31**	0.29	**400**	0.75	0.84
SB-67	NA	12	140	1.3	22	0.19	**310**	0.43	0.83

(6-12")									
GARDEN	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-68	0.84	12	390	1.5	**35**	0.30	**410**	0.75	0.67
SB-68 (6-12")	NA	9.3	120	1.2	25	0.15	**350**	0.41	0.74
SB-69	1.4	10	140	**2.0**	26	0.22	**360**	0.57	0.87
SB-69 (6-12")	NA	11	280	**4.0**	26	0.37	**550**	0.61	0.56
SB-70	0.78	8.0	100	1.0	20	0.11	**610**	0.46	0.61
SB-70 (6-12")	NA	9.5	110	1.4	24	0.21	**350**	0.37	0.72
Total	7.46	164	2521	26.14	415	3.54	6110	9.41	11.35
EPC	0.9	10.3	157.6	1.63	25.94	0.22	**382**	0.59	0.71
S-1 Std.	2.0	20	1000	2.0	30	100	300	400	20
EPC Tot.	**2.15**	11.3	125.7	1.82	25.02	0.21	279.5	0.62	0.65
Bkgd.(Nat.)	**NA**	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	**NA**	20	50	3	40	5	600	1	1

NA = Not Analyzed

#53 Hofmann Avenue Soil Sampling Data (mg/kg) 10/2/07 (0-6")									
SAMPLE	PCB	As	Ba	Cd	Cr	Ag	Pb	Se	Hg
SB-05	1.3	7.9	43	0.93	16	0.05	89	0.13	0.21
SB-06	1.3	7.2	42	0.87	16	0.05	77	0.53	0.24
SB-07	0.5	8.3	49	0.73	15	0.05	74	0.12	0.22
SB-08	0.4	7.7	40	0.59	14	0.05	54	0.40	0.21
SB-13	0.4	8.7	47	0.70	16	0.05	69	0.29	0.23
SB-14	0.6	8.2	51	0.81	17	0.05	76	0.38	0.26
SB-15	1.2	7.1	76	1.7	19	0.05	120	0.26	0.25
SB-19	0.6	11	46	0.68	18	0.05	70	0.12	0.22
SB-20	1.6	8.2	58	1.2	19	0.05	120	0.13	0.26
SB-21	**3.1**	9.4	**2200**	**2.4**	**130**	2.0	**760**	0.41	0.34
SB-21 (6-12")		9.7	340	**2.3**	**100**	1.3	**250**	.52	.27
SB-25	0.3	8.0	37	0.58	28	0.14	52	0.32	0.22
SB-26	0.4	9.8	50	0.94	17	0.12	75	0.36	0.25
SB-27	1.7	7.7	50	1.0	17	0.05	110	0.13	0.27
SB-32	2.0	14	68	1.6	21	0.15	140	0.40	0.35
SB-33	**3.4**	11	56	1.7	21	0.05	130	0.41	0.36
SB-34	1.2	11	270	**15**	28	0.31	**340**	1.6	0.52
SB-36	1.6	12	54	0.99	19	0.05	110	0.38	0.36
SB-38	1.9	17	280	**13**	27	0.14	290	1.1	0.72
Total	23.5	174.2	3517	45.4	558	4.76	3006	7.99	5.76
EPC	1.3	9.7	203	**2.5**	29.4	0.19	158	0.42	0.30
S-1 Std.	2.0	20	1000	2.0	30	100	300	400	20
Bkgd.	NA	20	50	2	30	0.6	100	0.5	0.3
Bkgd. (Coal/Wood Ash)	NA	20	50	3	40	5	600	1	1

Massachusetts Department of Environmental Protection **BWSC-108**

Bureau of Waste Site Cleanup

SCANNED

COMPREHENSIVE RESPONSE ACTION TRANSMITTAL FORM & PHASE I COMPLETION STATEMENT

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

Release Tracking Number: 3 - 18126

A. SITE LOCATION:

Site Name: (optional) J. Tombarello & Sons, Inc.

Street: 207 Marston Street Location Aid: Hofman Avenue

City/Town: Lawrence ZIP Code: 01843-0000

Related Release Tracking Numbers that this Form Addresses: 3-18431

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: _____

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

RECEIVED APR 9 2001 NORTHEAST REGION WOBURN, MASS.

☐ 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).

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☐ 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:

☐ 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:

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:

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

I. INTRODUCTION

This Scope of Work (SOW) outlines field investigations to be conducted as part of a Phase II Comprehensive Site Assessment for the John C. Tombarello & Sons, Inc. scrap metal recycling facility, located at 207 Marston Street, Lawrence, Massachusetts (the site), identified by Massachusetts Department of Environmental Protection (DEP) Release Tracking Numbers (RTN) 3-18126 and 3-18431. These activities are being conducted by Haley & Aldrich, Inc. (Haley & Aldrich) of Boston, Massachusetts, on behalf of American Recycling of Mass., Inc., d/b/a John C. Tombarello & Sons, Lawrence, Massachusetts (American). Mr. Elliot I. Steinberg, Vice President, will serve as the Licensed Site Professional (LSP) for the project.

The SOW addresses requirements outlined in the Massachusetts Contingency Plan (MCP) 310 CMR 40.0000 (MCP) and the terms of an Administrative Consent Order and Notice of Noncompliance File No. ACOP-NE-00-9013-123 (ACOP), effective 14 February 2001. A copy of the ACOP is provided in Appendix B. This SOW presents the approach and objectives of the Phase II field investigations and supporting information required by 310 CMR 40.0834.

OBJECTIVES

In accordance with the requirements for a Phase II Comprehensive Site Assessment, and the terms of the ACOP, the objectives of the Phase II field investigations include the following:

- Assessment of the integrity and contents of the subsurface drainage pipe leading from the baler/press room to the GLSD sewer;
- Assessment of soil and groundwater along the downgradient length of the referenced GLSD drainage pipe, downgradient and adjacent to the baler/press room building, and beneath an adjacent metal scrap pile;
- Assessment of the source, extent, and migration pathways of contamination at the site.

The SOW described herein is proposed to achieve these objectives and/or provide a basis for guiding further investigations or response actions that may be required for MCP compliance.