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SCANNED

TIER I PERMIT EXTENSION APPLICATION
FORMER MALDEN MGP FACILITY
MALDEN, MASSACHUSETTS
RELEASE TRACKING NUMBER: 3-0362
PERMIT TRANSMITTAL NUMBER: W055258

RECEIVED

SEP-2-2004

DEP

NORTHEAST REGIONAL OFFICE

by

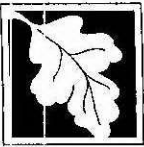
Haley & Aldrich, Inc.
East Hartford, Connecticut

for

Massachusetts Electric Company
Westborough, Massachusetts

File No. 06558-722
September 2004

HALEY &
ALDRICH



Enter your transmittal number

W 055258

Transmittal Number

Your unique Transmittal Number can be accessed online: <http://www.state.ma.us/scripts/dep/trasmfrm.stm> or call DEP's InfoLine at 617-338-2255 or 800-462-0444 (from 508, 781, and 978 area codes).

Massachusetts Department of Environmental Protection**Transmittal Form for Permit Application and Payment****SCANNED**

1. Please type or print. A separate Transmittal Form must be completed for each permit application.

2. Make your check payable to the Commonwealth of Massachusetts and mail it with a copy of this form to: DEP, P.O. Box 4062, Boston, MA 02211.

3. Three copies of this form will be needed.

Copy 1 - the original must accompany your permit application. Copy 2 must accompany your fee payment. Copy 3 should be retained for your records.

4. Both fee-paying and exempt applicants must mail a copy of this transmittal form to:

DEP
P.O. Box 4062
Boston, MA
02211

* Note:
For BWSC Permits,
enter the LSP.

A. Permit Information

BWSC 20

Tier I Permit Extension

1. Permit Code: 7 or 3 character code from permit instructions

2. Name of Permit Category

Permit to continue MCP Comprehensive Response Actions

3. Type of Project or Activity

B. Applicant Information - Firm or Individual

Massachusetts Electric Company

1. Name of Firm - Cr, if party needing this approval is an individual enter name below:

2. Last Name of Individual

3. First Name of Individual

4. MI

25 Research Drive

5. Street Address

Westborough

MA

01582

(508) 389-4296

6. City/Town

7. State

8. Zip Code

9. Telephone #

10. Ext. #

Michele V. Leone

11. Contact Person

12. e-mail address (optional)

C. Facility, Site or Individual Requiring Approval

Former Malden Manufactured Gas Plant (MGP) Facility

1. Name of Facility, Site Or Individual

100 Commercial Street

2. Street Address

Malden

MA

02148

3. City/Town

4. State

5. Zip Code

6. Telephone #

7. Ext. #

8. DEP Facility Number (if Known)

9. Federal I.D. Number (if Known)

3-0362

10. BWSC Tracking # (if Known)

D. Application Prepared by (if different from Section B)*

Haley & Aldrich, Inc.

1. Name of Firm Or Individual

800 Connecticut Boulevard, Suite 100

2. Address

East Hartford

CT

06108

(860) 290-3131

3. City/Town

4. State

5. Zip Code

6. Telephone #

7. Ext. #

Richard P. Standish, PG, LSP

2242

8. Contact Person

9. LSP Number (BWSC Permits only)

E. Permit - Project Coordination

1. Is this project subject to MEPA review? ☐ yes ☒ no
If yes, enter the project's EOE file number - assigned when an Environmental Notification Form is submitted to the MEPA unit:

EOEA File Number

F. Amount Due**Special Provisions:**

1. ☐ Fee Exempt (city, town or municipal housing authority)(state agency if fee is \$100 or less).
There are no fee exemptions for BWSC permits, regardless of applicant status.
2. ☐ Hardship Request - payment extensions according to 310 CMR 4.04(3)(c).
3. ☐ Alternative Schedule Project (according to 310 CMR 4.05 and 4.10).
4. ☐ Homeowner (according to 310 CMR 4.02).

120739

\$1,200.00

9/15/04

Check Number

Dollar Amount

Date

DEP Use Only

Permit No:

Rec'd Date:

Reviewer:

Haley & Aldrich, Inc.
800 Connecticut Blvd.
Suite 100
East Hartford, CT 06108-7303
Tel: 860.282.9400
Fax: 860.282.9500
HaleyAldrich.com

**HALEY &
ALDRICH**

29 September 2004
File No. 06558-722

Massachusetts Department of Environmental Protection
Northeast Regional Office
One Winter Street
Boston, Massachusetts 02108

Attention: DEP Permit Administration

Subject: Tier I Permit Extension Application
Former Malden MGP Site
100 Commercial Street
Malden, Massachusetts
DEP Release Tracking Number: 3-0362 and linked RTN 3-03757
Tier I B Permit 7378 W007378
Tier I Permit Transmittal: W055258

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Ladies and Gentlemen:

On behalf of the Massachusetts Electric Company (MEC), and in accordance with the Massachusetts Contingency Plan (MCP), we are pleased to provide the attached Tier I Permit Extension Application for the Former Malden Manufactured Gas Plant (MGP) site located at 100 Commercial Street in Malden, Massachusetts. The site is a Tier IB Disposal Site and is identified by Release Tracking Number (RTN) 3-0362. The effective date of the current Tier IB Permit No. 7378 is 28 December 1999.

A Phase II Comprehensive Site Assessment was submitted to DEP on 28 December 2001 and identified Significant Risks to human health, public welfare and the environment. The June 2003 Phase III RAP evaluated Remedial Action Alternatives to address risks posed by MGP residuals to human health and the environment, and selected a Comprehensive Remedial Action for the terrestrial portion of the Site. Haley & Aldrich, on behalf of MEC, submitted a Partial Class C Response Action Outcome Statement in February 2004 for the terrestrial portions of the former Malden MGP which have not yet received a Response Action Outcome (RAO) or a Waiver Completion Statement, and are not known to be the subject of MCP investigations by others. A Permit Extension is required to complete Comprehensive Response Actions at the disposal site as outlined in the Phase III RAP in accordance with the schedule outlined in the RAOP.

RATIONALE FOR CONTINUANCE OF RESPONSE ACTIONS

Response actions are ongoing at the site. It is the Opinion of this LSP that, if the DEP's review of the Tier I Permit Extension Application should extend beyond the date of the existing permit's expiration, that these response actions should continue during the review period. These response actions are part of the overall strategy for achieving MCP compliance for the Malden MGP site. This strategy has been developed from response actions completed under the initial Tier I Permit. Their conduct will not adversely affect disposal site conditions, increase the level of risk posed by the disposal site, or jeopardize future site investigations or response actions. As a result, these response actions should continue during the DEP's application review period, if necessary.

Please note that this application has been prepared on Form BWSC20 (rev. 07/03), as provided by the Massachusetts Department of Environmental Protection (DEP). As required, the application includes the following:

- One copy of the Transmittal Form for Application and Payment and photocopy of the permit fee application payment (\$1,200) payable to the Commonwealth of Massachusetts;
- A statement describing why the Permit Extension is being sought, pursuant to the MCP at 310 CMR 40.0706(2)(a);
- A statement detailing the Applicant's compliance history with DEP requirements since the effective date of the Tier I Permit, in accordance with 310 CMR 40.0703(9)(b);
- A list of Status Reports, Phase Reports or Completions Statements for response actions that are in progress or have been completed at the disposal site;
- For response actions that are in progress, a description of the current status and projected schedule for completion of such response actions;
- A copy of the tear sheet for the legal notice required by 310 CMR 40.0703(8)(a)(1); and,
- Copies of the cover letters and legal notice submitted to the City of Malden Mayor and Director of the Board of Health, as required by 310 CMR 40.0703(8)(a)(2).

Department of Environmental Protection
29 September 2004
Page 2

If you have any questions on the Tier I Permit Extension Application, please do not hesitate to contact the undersigned at 860-290-3115 or Michele Leone at MEC at 508-389-4296 about this submittal.

Sincerely yours,
HALEY & ALDRICH, INC.



Richard J. Rago
Senior Scientist



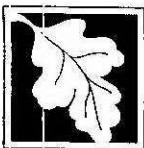
Richard P. Standish, P.G., LSP-of-Record
Vice President

Enclosures:

Tier I Permit Extension Application

cc: Massachusetts Electric Company; Attn: Michele V. Leone
KeySpan Energy Delivery; Patricia A. Haederle

HALEY &
ALDRICH



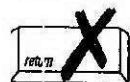
Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
BWSC 10 – Tier I Major Permit Modification
BWSC 20 – Tier I Permit Extension
BWSC 30 – Tier I Permit Transfer
Application for Supplemental Tier I Permit Actions

W 055258
Transmittal Number

3-0362
Release Tracking Number

A. Disposal Site Information

Important:
When filling out forms on the computer, use only the tab key to move your cursor – do not use the return key.



Note:
1. In the case of a permit transfer, the applicant is the transferee, or the individual requesting that the permit be transferred to his/her name.

2. If more than one category of supplemental Tier I permit action is being submitted concurrently, only one application fee is required.

- ☐ 1. Check here if there is more than one applicant. (A Primary Representative must be listed in Section B and each applicant must fill out Sections C, D and E.)
2. Which category of supplemental Tier I permit actions are you applying for? (Check all that apply.)
- ☐ a. Major Permit Modification (BWSC 10) ☐ d. Check here if applicant is a Homeowner pursuant to 310 CMR 4.02. A Homeowner Certification (BWSC120) must be submitted in order to qualify for the homeowner application fee.
- ☒ b. Permit Extension (BWSC 20)
- ☐ c. Permit Transfer (BWSC 30)

3. Current permit category:

- ☐ a. Tier IA (BWSC 01) ☐ d. Transition Tier IA (BWSC 04)
- ☒ b. Tier IB (BWSC 02) ☐ e. Transition Tier IB (BWSC 05)
- ☐ c. Tier IC (BWSC 03)

f. 7378 W007378
Permit Number

4. a. Former Malden Manufactured Gas Plant (MGP) Facility

Disposal Site Name

b. 100 Commercial Street

Street

c. Malden

City/Town

d. Massachusetts

State

e. 02148

Zip Code

5. List other release tracking number(s) that is(are) the subject of this permit application.

Release Tracking Number (RTN)

a. 3-3757 (linked RTN)

b. _____

c. _____

d. _____

e. _____

f. _____

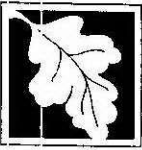
6. If the applicant is filing a Major Permit Modification, select the modification type being sought:

- ☐ a. Request for change in permit category. By checking this you are also certifying that a completed, revised Numerical Ranking System (NRS) Score Form and LSP Tier Classification Opinion prepared in accordance with 310 CMR 40.0510(3) is attached.

Revised Numerical Ranking System (NRS) Score

- ☐ i. Downgrade Tier IA to Tier IB ☐ v. Upgrade Tier IB to Tier IA
- ☐ ii. Downgrade Tier IA to Tier IC ☐ vi. Upgrade Tier IC to Tier IA
- ☐ iii. Downgrade Tier IB to Tier IC ☐ vii. Upgrade Tier IC to Tier IB
- ☐ iv. Downgrade to Tier II

- ☐ b. Request modifications to terms or conditions of permit. By checking this you are also certifying that a LSP Opinion as to why specific permit terms or conditions are no longer necessary or appropriate is attached. Include reports, as appropriate, detailing any new or additional information to justify the modification(s) to the permit terms or conditions being sought.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
BWSC 10 – Tier I Major Permit Modification
BWSC 20 – Tier I Permit Extension
BWSC 30 – Tier I Permit Transfer
Application for Supplemental Tier I Permit Actions

W 055258
Transmittal Number

3-0362
Release Tracking Number

A. Disposal Site Information (cont.)

7. If the applicant is filing a Permit Extension, select the reason for extending the permit: (check one)

☐ a. An extension is necessary to initiate or continue Comprehensive Response Actions at the site to achieve a Response Action Outcome (RAO). By checking this you are also certifying that a statement describing why the extension is sought is attached. Include a schedule for completing all work at the site and a summary of all response actions performed to date, including all phase work.

☒ b. An extension is necessary to conduct response actions at the site after a Response Action Outcome (RAO) has been submitted to DEP.

i. Select the RAO class filed for the disposal site: ☐ A3 ☐ A4 ☐ B2 ☐ B3 ☒ C

ii. Select the reason for conducting response actions after a RAO: (check one)

- ☒ Implement a Permanent Solution at a disposal site where a Class C RAO has been filed.
☐ Implement response actions pursuant to 310 CMR 40.1080 at a disposal site where an Activity and Use Limitation is in place in order to maintain No Significant Risk.
☐ Conduct further response actions at a disposal site where an Activity and Use Limitation is in place in order to withdraw such Limitation in order to allow certain site uses or activities which are prohibited pursuant to the existing Activity and Use Limitation.
☐ Implement response actions after a Periodic Evaluation conducted pursuant to 310 CMR 40.0580(1) reveals that more substantial response actions are required to maintain the Temporary Solution at such disposal site other than those that may be conducted for normal maintenance of the Class C RAO pursuant to a post-Class C RAO Operation Maintenance and/or Monitoring Plan pursuant to 310 CMR 40.0896.

ATTACHMENT A-7 REASON FOR EXTENSION

Introduction

Contamination present at the site is the result of over 100 years of MGP operations, and has impacted soil, groundwater, indoor air, sediments and surface water to varying degrees. Assessment activities began on Parcel E in 1988 and have since been conducted on Parcels A, B, and D under various Massachusetts Department of Environmental Protection (DEP) Release Tracking Numbers (RTNs).

Annual Tier II Extension Submittals were made for RTN 3-0362 from 1996 to 1999, and in August 1999, a Tier Re-Classification/Tier IA Permit Application was submitted to DEP. In response, DEP issued Tier IB Permit 7378, with an effective date of 28 December 1999. A Phase II Comprehensive Site Assessment was submitted to DEP on 28 December 2001, and a terrestrial Phase III Remedial Action Plan (RAP) was submitted to DEP on 2 July 2003. The Phase III report presented an evaluation of remedial alternatives for the terrestrial portion of the site.

In addition to successful completion of a sitewide Phase II Comprehensive Site Assessment and a terrestrial Phase III RAP, since the effective date of the Tier IB Permit, MEC has filed a terrestrial Partial Class C Response Action Outcome (RAOP) Statement (submitted in February 2004). MEC is also negotiating an Administrative Consent Order with DEP for the river (aquatic) portion of the Malden MGP Site.

Additional details regarding the reason for Permit Extension, Site Regulatory History, Risk Reduction Measures to date, and Schedule are provided below.

Statement Describing Reason For Extension

1. Implementation of Phase III RAP Response Actions

A Permit Extension is required to complete Comprehensive Response Actions at the disposal site as outlined in the Phase III RAP in accordance with the schedule outlined in the RAOP. The selected remedial alternative in the Phase III RAP constituted a temporary solution that included the following components:

- Extraction of DNAPL using extraction wells on Parcels A and E
- LNAPL extraction using belt-skimmers on Parcels A and E
- Installation of vertical barriers to prevent or reduce DNAPL migration between adjacent properties, if necessary
- In-situ chemical oxidation of TSM and petroleum-impacted soils (once NAPL quantity has been sufficiently reduced) on Parcels A and E

- Installation of biosparging and soil vapor extraction (SVE) systems on Parcel B, installed using HDD methods beneath the 129 Commercial Street building.
- A Site-wide groundwater monitoring program, including the sampling of approximately 20 to 25 monitoring wells on an annual basis, to ensure that site conditions remain stable during the implementation of the Temporary Solution on the site.
- AULs may be implemented on properties located within the boundaries of the site to mitigate potential exposure to contaminated soil. AULs may mandate the maintenance of a direct contact barrier (i.e., asphalt pavement) to prevent contact of site employees, visitors and trespassers with contaminated soil.

2. Ongoing RAM at 129 Commercial Street

Currently, a RAM is ongoing at the 129 Commercial Street property. This RAM was initiated to address concentrations of BTEXSN compounds detected in indoor air at 129 Commercial Street. The stated objective of the RAM Plan submitted to DEP in July 1998 was to seal portions of the floor slab that were identified as VOC vapor migration pathways through the floor slab in order to reduce VOC concentrations in indoor air. The RAM was modified on 9 April 1999 to include the installation of a sub-slab venting system. The RAM has involved quarterly indoor air monitoring, a pilot floor-sealing program, and the installation of a pilot scale, sub-slab ventilation system. The ongoing RAM is described further below and in Attachment G-2.

3. Ongoing Activities For The Malden River Ecosystem Restoration Study

The Malden River in its reach between the Malden River Culvert outfall and a point approximately 1,400 ft. downstream of the culvert outfall is also part of the site, as outlined in the Phase II. As described in the Phase III RAP, the Malden River portion of the site has been separated from the terrestrial portion of the site and MEC is negotiating an ACO with DEP for this portion of the site. As discussed with DEP during a meeting held on 3 April 2003, MEC intends to address the sediments in the Malden River as a separate operable unit (OU). Additionally, the Mystic Valley Development Commission (MVDC), through the TeleCom City partnership, has formed a group of parties with interest in the Malden River. The Telecom City partnership formed due to the proposed development of a state-of-the-art telecommunications research and development park on 200 acres of land situated in Malden, Medford and Everett, located along the Malden River and downstream of the site boundary. The MVDC has partnered with the Army Corps of Engineers to conduct a study of ecosystem impacts (the Malden River Ecosystem Restoration Study) and to identify potential remedial measures that may be undertaken in the Malden River from the culvert to the Amelia Earhart dam.

MEC is contributing technical and financial support to this project and is participating in the study, designated the Malden River Ecosystem Restoration Study. MEC also continues to participate in discussions regarding the restoration of the Malden River. In light of the on-going studies of the Malden River, evaluation of remedial measures for

the Malden River sediments associated with the former Malden MGP site would be more efficient and cost-effective if coordinated in conjunction with the remedial efforts along the larger portion of the River. MEC's ACO negotiations with DEP include establishing deadlines for the Malden MGP site-related sediment work that correspond with the schedule for the on-going studies.

Site Regulatory History and Related RTNs

Investigations began at the site in 1988, when the presence of coal tar contamination was first confirmed through subsurface borings. The site was initially designated a Tier II site under the MCP and assigned Release Tracking Number (RTN) 3-0362. RTN 3-0362 has been used to manage MCP compliance activities for the former holdings of the Malden MGP facility that have not been addressed by other parties, or that have not had a Waiver Completion Statement or RAO filed at DEP. A Partial Class C Response Action Outcome Statement was submitted for RTN 3-0362 in February 2004.

Several RTNs that have been assigned due to releases or possible releases of contaminants associated with the former Malden MGP facility have been linked with or otherwise related to RTN 3-0362, and include the following:

- RTN 3-03757, Parcel B, 129 Commercial Street: Assessment began in 1991 by others on behalf of the property owner(s) in response to the identification of oil and hazardous materials. These investigations detected concentrations of VOC compounds (BTEX and naphthalene) in soil and groundwater greater than reportable concentrations, and detected elevated concentrations of VOCs in indoor air in the commercial building on the property. RTN 3-03757 for the 129 Commercial Street property was linked to the former Malden MGP site RTN 3-0362 on 6 February 1997. As described in below and in Attachment G-2, an MCP Release Abatement Measure (RAM) is ongoing and includes the installation and maintenance of a mechanical sub-slab venting system and quarterly monitoring of indoor air. These additional response actions have resulted in a condition of No Significant Risk.
- RTN 3-11581, Diesel Fuel Piping IRA: An assessment-only IRA was conducted on Parcel E property in September 1994 in response to a failed tightness test for piping related to a diesel fuel tank. A small, "pinhole" leak was identified in the pipe and was repaired. Re-testing confirmed that the pipe was "tight," and an IRA Completion Report was filed with DEP on 8 November 1994. Because the diesel fuel contamination was potentially commingled with MGP residuals, RTN 3-11581 was linked with RTN 3-0362 upon completion of the IRA.
- RTN 3-13310, Parcel D (William R. Callahan Park): Based on the identification of the presence of MGP residuals during initial site investigations on the Callahan Park property, RTN 3-13310 was assigned, and a RAM was initiated in January 1996 as a risk reduction measure. As described above in Section 1.2, Callahan Park (Parcel D) is located on the northeast corner of

Charles and Pearl Streets adjacent to the site, and was the location of historical MGP gas holders and the governor house, which regulated gas flow from the holders to the distribution system. RAM activities included assessment of the extent of contamination and removal of oily soil and water associated with a historical drip pot and drip valve, and removal of mercury-contaminated soils associated with the former Medford Booster House. Upon completion of these remedial actions, Callahan Park was restored through soil placement and re-grading, followed by placement of a marker barrier, drainage subgrade, loam and sod. Catch basins in the Park were repaired or replaced, a new parking area was created on the northwestern corner of the Park, and the southern parking lot was re-paved.

A Partial Class A-3 RAO was filed for Callahan Park in January 1997. A small portion of the Callahan Park southern parking lot (the southwestern section) was included in the Grant of Environmental Restriction (GER), as shown in Figure 3, but is not considered part of the former Malden MGP site, RTN 3-0362. Similarly, a small portion of the Callahan Park southern parking lot (the southeastern section or Governor House area) was included in the GER but excluded from the partial Class A-3 RAO, as shown in Figure 3.

The partial Class A-3 RAO indicated that the extent of soil and groundwater contamination identified in the vicinity of the former Governor House and Charles Street had not been fully assessed at the time and was therefore excluded from the limits of Class A-3 RAO. This portion of the Callahan Park property is included in RTN 3-0362, and in the Partial Class C RAO.

- RTN 3-13345, Charles Street IRA (linked with RTN 3-13310): This assessment-only IRA was conducted in response to the detection of elevated total VOC concentrations identified in groundwater in Charles Street just south of Callahan Park. As described above, the results of initial site investigation activities on Callahan Park indicated the presence of MGP residuals (i.e., elevated PAH and VOC concentrations in soil and groundwater). A total VOC concentration of 9.72 mg/l in a monitoring well located in Charles Street (B130-MW) that was screened less than 15 ft. below ground surface and located less than 30 ft. from an occupied residence prompted the IRA. The purpose of the IRA was to assess whether the elevated VOCs detected in groundwater in Charles Street had resulted in elevated VOC concentrations in homes south of Charles Street, and if so whether the elevated VOC concentrations posed risk to the residents in the homes.

IRA activities included the necessary notifications, gauging for NAPL in wells in Charles Street, monitoring of indoor air for a 24-hour period inside 3 residential buildings, re-sampling of monitoring well B130-MW, and preparation of a Risk Characterization assessing risk due to exposure to VOCs in indoor air inside the residences. The Risk Characterization satisfied a condition of No Significant Risk to human health for carcinogenic and

noncarcinogenic effects. Therefore, an IRA Completion Statement was submitted on 19 March 1996 and further actions were not conducted.

- RTN 3-13753, Gasoline Release to Soil IRA, 100 Commercial Street: This RTN was assigned to an underground storage tank (UST) removal that took place on the 100 Commercial Street Property (Parcel E) in May 1996. The removal began as a RAM under RTN 3-0362 but was converted to an IRA and assigned RTN 3-13753 due to the detection of PID measurements in excess of 100 ppm during the UST removal. Two gasoline USTs and one diesel UST were removed, along with approximately 1063 gallons of water/gasoline mixture and 24 tons of petroleum-contaminated soil. An IRA Completion Statement for RTN 3-13753 was submitted on 12 July 1996, indicating that future response actions related to this release would be conducted under RTN 3-0362.
- RTN 3-12448 and 3-13754, WEB and MR Culvert IRAs: An IRA with RTN 3-12448 was initiated in May 1995 in response to observation of a recurring, discontinuous sheen on surface water flowing in the Malden River Culvert. IRA activities under RTN 3-12448 included deployment of absorbent booms in the culvert, a video survey of conditions in the culvert, installation of test borings and monitoring wells in the vicinity of the culverts, and sampling of culvert surface water, sediment, sheens, and groundwater from wells adjacent to the culverts. The findings of this IRA were that infiltration of coal tar into stormwater catch basins connected to the culverts was the cause of sheens on the culvert surface water. Accordingly, coal tar and sediments were removed from the culverts; catch basins and drain pipes emptying into the culverts were sealed and lined; and an IRA completion report for RTN 3-12448 was filed with DEP on 3 May 1996.

Subsequently, another IRA with RTN 3-13754 was initiated in May 1996 in response to the recurrence of a sheen on surface water in the WEB and MR Culverts. This IRA remained active through September 2003; IRA activities associated with this IRA included the following:

- Assessment: Sediment sampling; installation of monitoring wells and monitoring of DNAPL thickness in the wells; installation of tar monitoring points used to monitor tar thickness, if present, beneath the WEB and MR Culverts, including at the outfall; and periodic monitoring of lined catch basins and drain lines using video surveys
- Remedial response: Removal and disposal of approximately 525 tons of contaminated soil and sediments from catch basins and the culverts; installation of absorbent booms in the MR Culvert and periodic disposal of debris collected on the booms; repair and sealing of existing culvert expansion joints; grouting of culvert weep holes; lining of catch basins and drain lines that discharge into the culverts; installation of a seepage collar beneath and around the MR Culvert to prevent DNAPL migration beneath the culvert; lining of the 42-inch

drain line in Centre Street from Commercial Street to its connection with the WEB Culvert and installation and operation of a DNAPL recovery well, designated RW-1, through which approximately 702 gallons of DNAPL were removed from the subsurface.

- **Annual Culvert Observations:** Observation and documentation of the condition of the sealant on the expansion joints and to check for the presence of coal tar, contaminated surface water or sediment.

During the 2003 annual culvert inspections, neither DNAPL nor impacted sediments were observed, and the integrity of the seals on expansion joints appeared to be in good condition. Additionally, DNAPL was not observed in a monitoring point installed beneath the MR Culvert near its outfall. Therefore, on 12 September 2003 an IRA completion report for RTN 3-13754 was submitted to DEP, indicating that future response actions related to this release would be conducted as Comprehensive Response Actions under RTN 3-0362.

Summary of Risk Reduction Measures Conducted To Date

To date, substantial Risk Reduction Measures have been undertaken on the former Malden MCP site. Contaminated media have been removed during four general response actions at the site. These include: (A) removal of underground storage tanks and contaminated soil from 100 Commercial Street; (B) pilot-scale removal of LNAPL from a monitoring well located on Parcel E; (C) removal of sediments, DNAPL, and other wastes from 100 Commercial Street and the WEB and MR Culverts; and (D) reduction of VOC concentrations in indoor air at the 129 Commercial Street property. These response actions are described in more detail below.

- **Removal of USTs from the 100 Commercial Street Property:** Three USTs were removed from the 100 Commercial Street Property (Parcel E) in May 1995. The removal began as a RAM under RTN 3-0362 but was converted to an IRA and assigned RTN 3-13753 due to the detection of PID measurements in excess of 100 ppm during the UST removal. Two gasoline USTs and one diesel UST were removed, along with approximately 1063 gallons of water/gasoline mixture and 24 tons of petroleum-contaminated soil.
- **Pilot-scale LNAPL Removal, Parcel E:** As part of a RAM initiated in July 1993, a pilot-scale "siphons-without-a-pump" (SWAP) LNAPL removal system was installed in monitoring well B109A-OW, in which LNAPL had been consistently identified at thickness ranging from 0.2 ft. to 1.0 ft. The results of the test indicated that the SWAP technology was not appropriate for the LNAPL present at the site; approximately 0.5 gallons of LNAPL were collected over a period of approximately 10 months. Therefore, the conclusion of the RAM was that alternative LNAPL removal methods should be identified.
- **WEB and MR Culvert IRAs:** Two IRAs were conducted in response to the observance of sheens on surface water flowing in the WEB and MR Culverts. Response actions conducted in the culverts and in the vicinity of the culverts

between May 1995 and September 2003 included monitoring, sealing of culvert openings, sediment removal, lining of drain lines, and DNAPL removal. In total, approximately 525 tons (approx. 330 cy) of contaminated soil and sediments were removed from catch basins and the culverts and disposed of off-site. Absorbent booms were also installed in the WEB and MR Culvert, and waste and debris collected on the booms was periodically collected and disposed. Existing culvert expansion joints were sealed and culvert weep holes were grouted to prevent infiltration of DNAPL to the culverts. Catch basins and drain lines that discharge into the culverts were sealed and lined, and a grout seepage collar was installed beneath and around a discrete portion of the MR Culvert to prevent DNAPL migration beneath the culvert. Work also included lining of the 42-inch drain line in Centre Street from Commercial Street to its connection with the WEB Culvert. A DNAPL recovery well (designated RW-1) was installed adjacent to the WEB Culvert. A total of approximately 702 gallons of DNAPL was extracted from the subsurface using this well between September 2001 and September 2003. The IRA Completion Report for RTN 3-12448, West End Brook & Malden River Culverts, was dated 3 May 1996. The IRA Completion Report for RTN 3-0362 & 3-13754, West End Brook & Malden River Culverts, was dated 12 September 2003.

- **100 Commercial Street Corrosion Protection Anode Installation URAM:** This URAM was initiated by Haley & Aldrich on 16 November 2001 on behalf of KeySpan, the current property owner. The URAM consisted of the excavation of a trench approximately 1 ft. deep, and installation of seven corrosion-protection anodes in borings created using hollow-stem augers. Pavement was replaced subsequent to completion of anode installation. The anodes were installed to provide corrosion protection for a gas pipe on the KeySpan property. URAM activities included the management of contaminated soils generated during the anode installation. Excavated soils were re-used as backfill during the URAM; therefore soils were not sent off-site for treatment or disposal. A URAM Completion Report was submitted to DEP on 19 February 2002.
- **100 Commercial Street Sewer Pipe Installation URAM:** This URAM was initiated by Haley & Aldrich in January 2003 on behalf of KeySpan. Activities conducted under this URAM included the installation of a sewer pipe at the northwest corner of the KeySpan Operations building. Cuts were made in the concrete slab of the building and a trench was excavated to install a sewer pipe. Haley & Aldrich personnel observed mild odors and visual indications of contamination during excavation. Sewer piping was installed between 14 and 21 January 2003. Subsequently the trench was backfilled with excavated soils, compacted and concrete was poured to replace the floor slab on 24 January 2003. Less than 1 cy of soil was sent offsite for treatment to Clean Harbors of Bristol, CT on 16 April 2003. A URAM Completion Statement was filed on 13 May 2003.
- **129 Commercial Street RAM:** This RAM was initiated in November 1998 in response to the detection of elevated concentrations of benzene, toluene,

ethylbenzene, xylenes, styrene and naphthalene contaminants (BTEXSN) detected during Phase II investigations in indoor air at 129 Commercial Street. Detected concentrations did not constitute an imminent hazard for workers in the building, and were less than applicable occupational standards set by the US Occupational Safety and Health Administration (OSHA). However, remedial actions were deemed necessary to reduce long-term risks due to indoor air exposure.

Initially, RAM activities included a pilot floor-sealing program in a portion of the 129 Commercial Street facility. However, testing of the sealed portion of the floor indicated that this program was not successful, and the RAM was modified to include the installation of a sub-slab venting system. A sub-slab venting system was installed in October 1999, consisting of five 2-inch diameter soil vapor extraction points installed horizontally through the foundation wall beneath the floor slab. The vapor extraction points extend approximately five ft. beneath the building. These points were connected to a 140-cfm blower that removes vapors from beneath the floor slab and directs them through a 165-lb granular activated carbon drum for treatment. The blower and carbon drum are stored in a temporary building located east of the building along Commercial Street. Treated air is emitted through a 4-inch diameter vent pipe to the atmosphere. This system has been maintained since

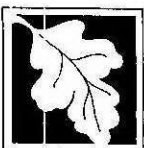
- installation of biosparging and soil vapor extraction (SVE) systems on Parcel B, installed using HDD methods beneath the 129 Commercial Street building;
- a site-wide groundwater monitoring program, including the sampling of approximately 20 to 25 monitoring wells on an annual basis, to ensure that site conditions remain stable during the implementation of the Temporary Solution on the site; and,
- AULs may be implemented on properties located within the boundaries of the site to mitigate potential exposure to contaminated soil. AULs may mandate the maintenance of a direct contact barrier (i.e., asphalt pavement) to prevent contact of site employees, visitors and trespassers with contaminated soil.

The following key aspects were identified as "critical path" elements of the remedial process, and are likely to dictate the schedule of continued remedial action implementation:

1. Property access and property use: The Former Malden MGP Site is comprised of seven properties, all of which are owned by entities other than MEC. Therefore, implementation of the remedy must be coordinated with the needs of property owners. The properties located within the limits of the site are occupied by operating businesses, which must be allowed to function during implementation of the remedy.
2. Appropriate sequencing of remedial technologies: In areas where NAPL removal is planned, the quantity of NAPL in the subsurface must be reduced to the extent practicable prior to the remediation of tar-saturated material (TSM) and soil. Remediation of TSM or impacted soil prior to the removal of LNAPL or DNAPL would be ineffective. Following removal of LNAPL or DNAPL, other remedial technologies, such as in-situ chemical oxidation, will be implemented to address soil impacts.
3. Other technical considerations: Technical factors regarding the effectiveness of the proposed remedial components will be taken into consideration during implementation of the remedy. For example, proper location of DNAPL extraction wells is dependent upon the elevation of the organic deposit, which has been observed to be highly irregular during subsurface investigations. Based on these observations, DNAPL extraction wells may be installed in stages, such that the locations of the second stage of DNAPL extraction wells would be determined based on the results obtained in the first stage. The most efficient placement of DNAPL or LNAPL extraction wells may result in the installation of extraction wells on one property before another. For example, MEC implemented a subsurface test boring program in June 2004 intended to gain data necessary to plan the next NAPL extraction well(s) placement and design.

Projected Schedule

The proposed remedy for the Site will be implemented in accordance with and consideration of these critical elements. Based on the complexity of the contamination and ownership situation of the site, it is likely that a phased approach to site remediation will be followed. Components of the proposed remedy will be implemented as they become feasible in the overall Site remedial plan. It is anticipated that initial NAPL recovery will begin in Winter 2004 with installation of DNAPL recovery on 100 Commercial Street property. A RAM Plan for NAPL recovery is currently being prepared and is anticipated to be submitted in Fall 2004. Following evaluation and assessment of DNAPL recovery on the 100 Commercial Street property, further NAPL recovery activity will be commenced, including DNAPL and applicable LNAPL recovery. SVE and bioparging on 129 Commercial Street is currently in the pre-design stages with ongoing activities including a pilot test of the existing system and additional data review. A RAM Plan Modification for Parcel B will be developed following these activities and is anticipated to be submitted in 2005. More detailed schedules for implementation and operation and maintenance for these definitive and enterprising steps will be included in the respective RAM plans.



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B. Primary Representative Information

Note:

1. Complete this section only if there is a **change in the Primary Representative** or if you have not previously furnished this information to DEP.

2. If there is **only one** applicant, you do not need to complete this section.

3. If there is **more than one** applicant, then the Primary Representative should complete this section.

4. The **Primary Representative** for multiple applicants will receive the annual compliance assurance fee statement for the disposal site.

1. Primary Representative:

a. Is the Primary Representative also an applicant? ☐ i. Yes ☐ ii. No

b. _____
Name of Organization

c. _____
Name

d. _____
Title

e. _____
Street

f. _____
City/Town

g. _____
State

h. _____
Zip Code

i. _____
Telephone

j. _____
E-mail (optional)

k. _____
Contact Name (if different)

l. _____
Contact Telephone

2. Primary Representative Certification:

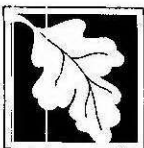
I attest under the pains and penalties of perjury that I am fully authorized to act on behalf of all persons submitting this permit application for the following purposes: (i) to receive oral and written correspondence from DEP with respect to this application; (ii) to receive oral and written correspondence from DEP with respect to the performance of response actions conducted pursuant to the Tier I permit; and (iii) to receive any statement of fee required by 310 CMR 4.03(3) associated with the Tier I permit. I am aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate or incomplete information.

a. _____
Name (Print)

b. _____
Position or Title

c. _____
Signature

d. _____
Date



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C. Applicant Information

Note:

1. All applicants must complete this section. Where there is more than one Applicant, make copies of this page, have each applicant provide this information, and then attach all copies to this application.

2. The applicant, or the Primary Representative for more than one applicant, will receive the annual compliance assurance fee statement for the disposal site.

1. Applicant:

a. Massachusetts Electric Company

Name of Organization

b.

Applicant Name

c.

Title

d. 25 Research Drive

Street

e. Westborough

City/Town

f. Massachusetts

State

g. 01582

Zip Code

h. (508) 389-4296

Telephone

i.

E-mail (optional)

j. Michele V. Leone

Contact Name (if different)

k. (508) 389-4296

Contact Telephone

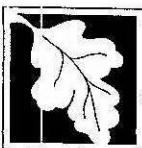
2. Type of Applicant: (check one):

- ☐ a. Individual
☐ b. Sole proprietorship
☐ c. Partnership
☒ d. Corporation
☐ e. Realty trust
☐ f. State authority
☐ g. Municipality
☐ h. State agency
☐ i. Federal agency
☐ j. Other, please specify: _____

3. Relationship of applicant to disposal site (check all that apply):

- ☐ a. Current owner (as defined in Section 5(a)(1) of M.G.L. c 21E)
☐ b. Current operator (as defined in Section 5(a)(1) of M.G.L. c 21E)
☒ c. Past owner (as defined in Section 5(a)(2) of M.G.L. c 21E)
☒ d. Past operator (as defined in Section 5(a)(2) of M.G.L. c 21E)
☐ e. Generator (as defined in Section 5(a)(3) of M.G.L. c 21E)
☐ f. Transporter (as defined in Section 5(a)(4) of M.G.L. c 21E)
☒ g. Other legally responsible party (as defined in Section 5(a)(5) of M.G.L. c 21E)
☐ h. Other person (as defined in 310 CMR 40.0006(10))

☐ 4. Check here to certify that additional copies of Sections C, D and E are attached to this application.



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D. Applicant's Compliance History

Note:
Each applicant must complete this section. For disposal sites with more than one **Applicant**, make copies of this section, have each applicant complete this information, and then attach all copies to this application.

- ☒ 1. Check here to certify that a statement further describing the applicant's compliance history is attached.
- This statement must describe the applicant's history of compliance with DEP's requirements, including, but not limited to, M.G.L. c. 21E, 310 CMR 40.0000, and other laws for the protection of health, safety, public welfare and the environment administered or enforced by federal, state and local government agencies, that are material to the disposal site. Such a statement should identify information such as: action(s) material to the disposal site taken by DEP to enforce its requirements including, but not limited to Notice of Noncompliance (NON), Notice of Intent to Assess Civil Administrative Penalty (PAN), administrative enforcement order, Notice of Responsibility (NOR), Notice of Intent to Take Response Action (NORA); Administrative Consent Order; Judicial Consent Judgment; similar administrative actions taken by other states, federal, or local agencies; and/or civil or criminal actions material to the disposal site brought on behalf of DEP or other federal, state, or local agencies and any additional information relevant to the applicant's history of compliance. For each action identified, give the name of the issuing authority and identification number, if available, and a description of the noncompliance cited, the current status of the matter, and final disposition, if any.
- ☐ 2. Check here if a statement of the applicant's compliance history was previously submitted, and there has been no change in that person's compliance history.

3. List all other DEP permits or licenses held by the applicant that are material to this disposal site:

Program	Permit Code	Permit Category	Facility ID
a. Air Quality			
b. Hazardous Waste (M.G.L. c. 21C)			
c. Solid Waste			
d. Industrial Wastewater Management			
e. Water Supply			
f. Water Pollution Control: Surface Water			
g. Water Pollution Control: Groundwater			
h. Water Pollution Control: Sewer Connection			
i. Wetlands & Waterways			

4. List all other permits, licenses, certifications, registrations, variances, or other approvals issued by other federal, state, or local authorities and held by applicant that are material to this disposal site:

Issuing Authority	Identification Number	Date Issued
a. DEP Tier IB Permit	7378	effective 12/28/99
b.		
c.		

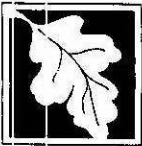
ATTACHMENT D-1
APPLICANT'S COMPLIANCE HISTORY

TIER I PERMITS HELD BY APPLICANT FOR OTHER DISPOSAL SITES

DISPOSAL SITE NAME	TYPE	BWSC PERMIT #	RTN/SITE ID(s)
Arlington MGP	IB	8727	3-4241
Lynn MGP	IB	80568	3-1308
Nantucket MGP	IA	82735	4-0363
Spencer MGP (MEC Property)	IB	84822	2-0128
Spencer MGP (KeySpan Property)	IC	9817	2-12707, 2-3066
Williamstown MGP	IB	111907	1-10969
Danvers MGP	IC	113216	3-11970
Webster MGP	IA	113324	2-0382, 2-0949
Adams MGP	IC	127860	1-11670
Marblehead MGP	IB	127061	3-12092
Malden MGP	IB	7378	3-0362, 3-12448
Park Street Sub, Gardner	IB	W024314	2-13577
Newburyport MGP	IB	8386	3-18057
Salem, MGP	IB	83007	3-1709
Depot St., Milford	IC	7521	2-12441
Beverly MGP	IC	131331	3-3466

TIER II DISPOSAL SITES WHERE APPLICANT IS CONDUCTING RESPONSE ACTIONS

DISPOSAL SITE NAME	RTN/SITE ID(s)
Southbridge MGP	2-11251
Leominster MGP	2-12548
Clinton MGP	2-0869
North Adams MGP	1-10694
Central District Headquarters	2-12123
Chandonnet Property	3-0347
Revere MGP	3-3775
Pratt's Junction	2-12349
Centerville Sub, Winchendon	2-13054
60 Hartwell St., Fall River	4-15520
118 4 th St., Fall River	4-15521
Brookside Drive, Wilbraham	1-13613
Faraday Street Sub, Worcester	2-13479
Former ASTs, No. 2 Sub, Millbury	2-13614



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E. Applicant Certifications

1. Certification of Submittal

I attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this submittal, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the person or entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. Statement of Ability and Willingness

I attest under the pains and penalties of perjury that (i) I/the person(s) or entity(ies) on whose behalf this submittal is made has/have personally examined and am/is familiar with the requirements of M.G.L. c. 21E and 310 CMR 40.0000; (ii) based upon my inquiry of the/those Licensed Site Professional(s) employed or engaged to render Professional Services for the disposal site which is the subject of this permit application and of the person(s) or entity(ies) on whose behalf this submittal is made, and my/those person's(s') or entity's(ies) understanding as to the estimated costs of necessary response actions, that/those person(s) or entity(ies) has/have the technical, financial and legal ability to proceed with response actions for such site in accordance with M.G.L. c. 21E, 310 CMR 40.0000 and other applicable requirements; and (iii) that I am fully authorized to make this attestation on behalf of the person(s) or entity(ies) legally responsible for this submittal. I/the person(s) or entity(ies) on whose behalf this submittal is made is aware of the requirements in 310 CMR 40.0172 for notifying the Department in the event that I/the person(s) or entity(ies) on whose behalf this submittal is made and/is(are) unable to proceed with the necessary response actions.

3. Certification of Remittance of Permit Application Fee

I attest under the pains and penalties of perjury that, on or before the date of submittal of this permit application to the Department, I remitted, or caused to be remitted, the applicable permit fee payable in accordance with 310 CMR 4.00.

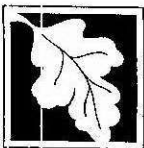
4. Terms and Conditions Consent (if the applicant is filing a Permit Transfer)

I understand that this is a permit to proceed with response actions required under 310 CMR 40.0000 and agree to conduct all response actions pursuant to the terms and conditions of any and all Department approvals that are in effect on October 1, 1993 as well as all future response actions at the disposal site which are not subject to an existing Department approval in accordance with the provisions of 310 CMR 40.0000. I also understand and agree to all of the permit conditions set forth in 310 CMR 40.0740 and any other conditions included with the Permit. I will not proceed with response actions at the subject site until I receive Department approval of this permit transfer.

5. Applicant/Transferee Acceptance

a. MICHELE V. LEONE
Name (Print)
b. SR. ENVIRONMENTAL ENG.
Position or Title
c. [Signature]
Signature
d. 09/27/2004
Date

Note:
Each applicant must complete this section. For disposal sites with more than one Applicant, make copies of this page, have each applicant complete this information, and then attach all copies to this application.



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F. Transferor Information and Certification

Note:

1. The transferor is the current permittee who is transferring the permit to a new permittee.

2. Each current permittee/transferor must complete this section. For disposal sites with more than one current permittee/transferor, make copies of this page, have each current permittee/transferor complete this information, and then attach all copies to this application.

1. If the applicant is filing a Permit Transfer, please fill out the following information on the current permittee (the transferor):

a. _____ Name of Organization		
b. _____ Name	c. _____ Title	
d. _____ Street		
e. _____ City/Town	f. _____ State	g. _____ Zip Code
h. _____ Telephone	i. _____ E-mail (optional)	
j. _____ Contact Name (if different)	k. _____ Contact Telephone	

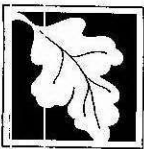
2. Permit Transfer Consent:

I hereby consent to the transfer of my Tier I Permit for the Disposal Site/Release Tracking Number(s) stated in Section A of this application to the proposed transferee(s) designated in Section C of this application. I understand that I am still responsible for conducting all response actions required by M.G.L. c. 21E and 310 CMR 40.0000 until the Department has approved this application.

a. _____ Name (Print)
b. _____ Position or Title
c. _____ Signature
d. _____ Date

- ☐ 3. Check here if there is more than one transferor and additional copies of this certification are attached to this application.

- ☐ 4. Check here to certify that a statement as to why the permit transfer is being sought is attached.



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G. Required Technical Submittals with Application

1. Please indicate which of the following response actions are in progress or have been completed at this disposal site at the time of this application:

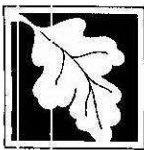
Response Actions	Completed	In Progress
a. Limited Removal Action (LRA)	<input type="checkbox"/>	
b. Immediate Response Action (IRA)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Release Abatement Measure (RAM)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
d. Utility Related Abatement Measure (URAM)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Phase I Initial Site Investigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Phase II Comprehensive Site Assessment	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Phase III Identification, Evaluation and Selection of Comprehensive Remedial Action Alternatives	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Phase IV Implementation of the Selected Remedial Action Alternative (Remedy Implementation Plan only)	<input type="checkbox"/>	<input type="checkbox"/>
i. _____ Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>

2. Please indicate which of the following Status Reports, Phase Reports, or Completion Statements have been prepared for response actions that are in progress or have been completed at the disposal site at the time of this application.

Document	Previously Submitted	Submitted with this Application	Projected Date for Completion
a. Bill(s) of Lading	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Immediate Response Action (IRA) Plan(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
c. IRA Status Report(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
d. IRA Completion Report(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
e. Release Abatement Measure (RAM) Plan(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
f. RAM Status Report(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
g. RAM Completion Report(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
h. Utility-Related Abatement Measures (URAM)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____

Note:
For response actions in progress, attach a statement of description of the current status and projected schedule for completion of such response actions.

see also
Attachment G-2



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G. Required Technical Submittals with Application (cont.)

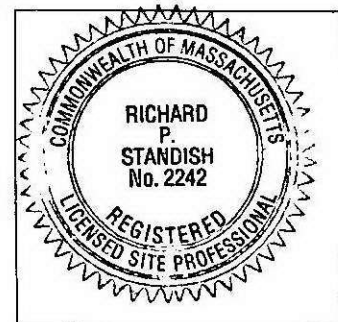
Document	Previously Submitted	Submitted with this Application	Projected Date for Completion
i. URAM Status Report(s)	<input type="checkbox"/>	<input type="checkbox"/>	
j. URAM Completion Report(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
k. Phase I Report and Completion Statement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
l. Phase II Scope of Work	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
m. Phase II Report and Completion Statement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
n. Phase III Remedial Action Plan and Completion Statement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
o. Phase IV Remedy Implementation Plan (RIP)	<input type="checkbox"/>	<input type="checkbox"/>	
p. Phase IV As-Build Construction Report	<input type="checkbox"/>	<input type="checkbox"/>	
q. Phase IV Final Inspection Report and Completion Statement	<input type="checkbox"/>	<input type="checkbox"/>	
r. Phase V Operation Maintenance and/or Monitoring	<input type="checkbox"/>	<input type="checkbox"/>	
s. Remedy Operation Status (ROS)	<input type="checkbox"/>	<input type="checkbox"/>	
t. Response Action Outcome (RAO) Statement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
u. _____ Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>	

H. Licensed Site Professional Opinion

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

1. 2242 License Number
2. Richard P. Standish LSP Name (Print)
3. 27 SEPT 2004 Date
4. 860-290-3131 Telephone
5. [Signature] LSP Signature

6. LSP Seal:



ATTACHMENT G-1
LIST OF REPORTS

1. Haley & Aldrich, Inc., "Report on Oil and Hazardous Material Site Evaluation, Boston Gas Company, Commercial and Center Streets, Malden, Massachusetts", dated 26 August 1988
2. Haley & Aldrich, Inc., "Report on Oil and Hazardous Material Site Evaluation, Boston Gas Company, Commercial and Charles Streets, Malden, Massachusetts", dated 20 September 1988
3. Haley & Aldrich, Inc., "Report on Oil and Hazardous Material Site Evaluation and Conceptual Remedial Recommendation, Boston Gas Company, 100 Commercial Street, Malden, Massachusetts", Volumes I through III, dated 21 September 1988
4. Haley & Aldrich, Inc., "Report on Summary of Work, West End Brook Conduit Sealing, Boston Gas Company Property, Malden, Massachusetts, DEP Waiver Case No. 3-0362," dated 28 February 1994
5. Haley & Aldrich, Inc., "Report on Supplemental Phase II - Comprehensive Site Assessment, Boston Gas Property, 100 Commercial Street, Malden, Massachusetts, Waiver Case No. 3-0362", Volumes I through III, dated 23 March 1994
6. Haley & Aldrich, Inc., "Report on Supplemental Phase II Risk Characterization, Boston Gas Company Property, 100 Commercial Street, Malden, Massachusetts, DEP Waiver Case No. 3-0362, Volume III," dated 31 March 1994
7. Haley & Aldrich, Inc., "Assessment IRA Completion Report, Boston Gas Property, 100 Commercial Street, Malden, Massachusetts, Waivered Site #3-0362, TOR RTN 3-11581", dated 8 November 1994
8. Haley & Aldrich, Inc., "Tier II Extension Submittal/Change in Persons, Undertaking response Actions, 100 Commercial Street, Malden, Massachusetts, DEP Waiver RTN 3-0362," dated February 1995
9. Haley & Aldrich, Inc., "Immediate Response Action (IRA) Plan, West End Brook - Malden River Culverts, Malden, Massachusetts, RTN 3-12448 dated 20 June 1995
10. Haley & Aldrich, Inc., "Immediate Response Action (IRA) Status Report, West End Brook - Malden River Culverts, Malden, Massachusetts, RTN 3-12448 dated 1 September 1995
11. Haley & Aldrich, Inc., "Immediate Response Action Status Reports, RTN 3-12448, West End Brook & Malden River Culverts", dated 20 October 1995
12. Haley & Aldrich, Inc., "Release Abatement Measure Plan, Former Manufactured Gas Plant, Parcel D - Callahan Park, Charles and Pearl Streets, Malden, Massachusetts, RTN 3-13310", dated January 1996
13. Haley & Aldrich, Inc., "Immediate Response Action Status Reports, RTN 3-12448, West End Brook & Malden River Culverts", dated 19 February 1996

14. Haley & Aldrich, Inc., "Data Report, Former Manufactured Gas Plant, Parcel D - William R. Callahan Memorial Park, Charles and Pearl Streets, Malden, Massachusetts, RTN 3-13310", dated 29 February 1996
15. Haley & Aldrich, Inc., "Immediate Response Action (IRA) Completion Report (Assessment Only), Charles Street, Malden, Massachusetts, RTN 3-13345", dated 19 March 1996
16. Haley & Aldrich, Inc., "Tier II Extension Renewal, Former Manufactured Gas Plant, 100 Commercial Street, Malden, Massachusetts, RTN 3-0362," dated 16 April 1996
17. Haley & Aldrich, Inc., "Immediate Response Action Completion Report, RTN 3-12448, West End Brook & Malden River Culverts", dated 3 May 1996
18. Haley & Aldrich, Inc., "Release Abatement Measure Completion Report, Former Manufactured Gas Plant, William R. Callahan Memorial Park, Charles and Pearl Streets, Malden, Massachusetts, RTN 3-13310", dated 27 June 1996
19. Haley & Aldrich, Inc., "Immediate Response Action Plan, RTN 3-13754, West End Brook & Malden River Culverts", dated 12 July 1996
20. Haley & Aldrich, Inc., "IRA Plan, West End Brook - Malden River Culverts, Malden, Massachusetts, RTN 3-13754", dated 12 July 1996
21. Haley & Aldrich, Inc., "Report on Phase I - Initial Site Investigation and Tier Classification, Parcel D - William R. Callahan Memorial Park, Charles and Pearl Streets, Malden, Massachusetts, Release Tracking Numbers: 3-13310, 3-13345", Volumes I and II, dated 3 January 1997
22. Haley & Aldrich, Inc., "Tier II Extension Submittal/Transfer Submittal, Former New England Shrimp, 129 Commercial Street, Malden, Massachusetts, RTN 3-3757," dated 6 February 1997
23. Haley & Aldrich, Inc., "Tier II Extension Submittal/Linking of Additional RTNs, Former Manufactured Gas Plant, 100 Commercial Street and Vicinity, Malden, Massachusetts, RTN 3-0362," dated 6 February 1997
24. Haley & Aldrich, Inc., "IRA Status Report No. 2, West End Brook - Malden River Culverts, Malden, Massachusetts, RTN 3-13754", dated 12 March 1997.
25. Haley & Aldrich, Inc., "Scope of Work, Phase II - Comprehensive Site Assessment, Former Manufactured Gas Plant (MGP) Site, 129 Commercial Street Malden, Massachusetts RTN 3-0362 and Linked RTNs 3-3757, 3-13310, and 3-13345", dated July 1997
26. Haley & Aldrich, Inc., "IRA Plan Update, West End Brook - Malden River Culverts, Malden, Massachusetts, RTN 3-13754 and 3-0362", dated 2 July 1997
27. Haley & Aldrich, Inc., "IRA Status Report No. 3, West End Brook - Malden River Culverts, Malden, Massachusetts, RTN 3-0362 and 3-13754", dated 5 September 1997
28. Haley & Aldrich, Inc., "Tier II Extension Submittal, Former Manufactured Gas Plant, 100 Commercial Street and Vicinity, Malden, Massachusetts, RTN 3-0362," dated 19 February 1998

29. Haley & Aldrich, Inc., "IRA Status Report No. 4, West End Brook - Malden River Culverts, Malden, Massachusetts, RTN 3-0362 and 3-13754", dated 12 March 1998
30. Haley & Aldrich, Inc., "Release Abatement Measure Plan Former Manufactured Gas Plant (MGP) Site Parcel B, 129 Commercial Street, Malden, Massachusetts RTN 3-0362 and linked RTNs 3-3757, 3-13310, and 3-13345", dated 2 July 1998
31. Haley & Aldrich, Inc., "IRA Status Report No. 5, West End Brook - Malden River Culverts, Malden, Massachusetts, RTN 3-0362 and 3-13754", dated 11 September 1998
32. Haley & Aldrich, Inc., "IRA Plan Update, West End Brook - Malden River Culverts, Malden, Massachusetts, RTN 3-0362 and 3-13754", dated 27 October 1998
33. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Plan, Passive LNAPL Recovery, Malden, Massachusetts, RTN 3-0362", dated 19 January 1999
34. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 1 Former Manufactured Gas Plant (MGP) Site Parcel B, 129 Commercial Street Malden, Massachusetts RTN 3-0362 and Linked RTNs 3-3757, 3-13310, and 3-13345", dated 22 January 1999
35. Haley & Aldrich, Inc., "Tier II Extension Submittal, Former Manufactured Gas Plant, 100 Commercial Street, Malden, Massachusetts, RTN 3-0362 and Linked RTNs 3-3757, 3-311581, 3-12448, 3-13310, 3-13345, 3-13753, and 3-13754," dated 15 February 1999
36. Haley & Aldrich, Inc., "IRA Status Report No. 6, West End Brook - Malden River Culverts, Malden, Massachusetts, RTN 3-0362 and 3-13754", dated 11 March 1999
37. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 1, Malden, Massachusetts, RTN 3-0362", dated 1 April 1999
38. Haley & Aldrich, Inc., "Modification to Release Abatement Measure (RAM), Former Manufactured Gas Plant (MGP) Site Parcel B, 129 Commercial Street Malden, Massachusetts RTN 3-0362 and Linked RTNs 3-3757, 3-11581, 3-12448, 3-13310, 3-13345, 3-13753, and 3-13754", dated 12 April 1999
39. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 2, Former Manufactured Gas Plant (MGP), Site Parcel B, 129 Commercial Street Malden, Massachusetts RTN 3-0362 and Linked RTNs 3-3757, 3-11581, 3-12448, 3-13310, 3-13345, 3-13753 and 3-13754", dated 22 July 1999
40. Haley & Aldrich, Inc., "Revised Scope of Work, Phase II - Comprehensive Site Assessment, Former Manufactured Gas Plant (MGP) Site, Malden, Massachusetts, RTN 3-0362, Permit No. W007378" dated 4 February 2000
41. Haley & Aldrich, Inc., "Immediate Response Action Status Report No. 8, RTN 3-0362 & 3-13754, West End Brook - Malden River Culverts, Malden, Massachusetts," dated March 2000
42. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 4, Former Manufactured Gas Plant (MGP) Site, Parcel B, 129 Commercial Street, Malden, Massachusetts, RTN 3-0362 and Linked RTN 3-3757, Tier IB Permit 7378," dated April 2000

43. Haley & Aldrich, Inc., "2000 Annual Inspection Summary, Callahan Park, Former Malden MGP Storage and Distribution, Malden, Massachusetts," dated August 2000
44. Haley & Aldrich, Inc., "Immediate Response Action Status Report No. 9, RTN 3-0362 & 3-13754, West End Brook - Malden River Culverts, Malden, Massachusetts," dated September 2000
45. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 5, Former Manufactured Gas Plant (MGP) Site, Parcel B, 129 Commercial Street, Malden, Massachusetts, RTN 3-0362 and Linked RTN 3-3757, Tier IB Permit 7378," dated October 2000
46. Haley & Aldrich, Inc., "Immediate Response Action Status Report No. 10, RTN 3-0362 & 3-13754, West End Brook - Malden River Culverts, Malden, Massachusetts," dated 12 March 2001
47. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 6, Former Manufactured Gas Plant (MGP) Site, Parcel B, 129 Commercial Street, Malden, Massachusetts, RTN 3-0362 and Linked RTN 3-3757, Tier IB Permit 7378," dated 5 April 2001
48. Haley & Aldrich, Inc., "2001 Annual Inspection Summary, Callahan Park, Former Malden MGP Storage and Distribution, Malden, Massachusetts," dated August 2001
49. Haley & Aldrich, Inc., "Immediate Response Action Status Report No. 11, RTN 3-0362 & 3-13754, West End Brook - Malden River Culverts, Malden, Massachusetts," dated September 2001
50. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 7, Former Manufactured Gas Plant (MGP) Site, Parcel B, 129 Commercial Street, Malden, Massachusetts, RTN 3-0362 and Linked RTN 3-3757, Tier IB Permit 7378," dated October 2001
51. Haley & Aldrich, Inc., "Report on Phase II Comprehensive Site Assessment, Former Malden MGP Site, Malden, Massachusetts", dated 28 December 2001
52. Haley & Aldrich, Inc., "Immediate Response Action Status Report No. 12, RTN 3-0362 & 3-13754, West End Brook - Malden River Culverts, Malden, Massachusetts," dated 12 March 2002
53. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 8, Former Manufactured Gas Plant (MGP) Site, Parcel B, 129 Commercial Street, Malden, Massachusetts, RTN 3-0362 and Linked RTN 3-3757, Tier IB Permit 7378," dated 5 April 2002
54. Haley & Aldrich, Inc., "2002 Annual Inspection Summary, Callahan Park, Former Malden MGP Storage and Distribution, Malden, Massachusetts," dated 6 August 2002

55. Haley & Aldrich, Inc., "Immediate Response Action Status Report No. 13, RTN 3-0362 & 3-13754, West End Brook - Malden River Culverts, Malden, Massachusetts," dated 12 September 2002
56. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 9, Former Manufactured Gas Plant (MGP) Site, Parcel B, 129 Commercial Street, Malden, Massachusetts, RTN 3-0362 and Linked RTN 3-3757, Tier IB Permit 7378," dated 7 October 2002
57. Haley & Aldrich, Inc., "Immediate Response Action Status Report No. 14, RTN 3-0362 & 3-13754, West End Brook - Malden River Culverts, Malden, Massachusetts," dated 12 March 2003
58. Haley & Aldrich, Inc., "Utility-Related Abatement Measure (URAM) Completion Report, Sewer Pipe Installation, 100 Commercial Street, Malden, Massachusetts, RTN 3-0362," dated 13 May 2003
59. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 10, Former Manufactured Gas Plant (MGP) Site, Parcel B, 129 Commercial Street, Malden, Massachusetts, RTN 3-0362 and Linked RTN 3-3757, Tier IB Permit 7378," dated 7 April 2003
60. Haley & Aldrich, Inc., "Phase III Remedial Action Plan, Former Malden MGP Site - Upland Portion, Malden, Massachusetts, RTN 3-0362, Tier IB Permit Number 7378," dated June 2003
61. Haley & Aldrich, Inc., "2003 Annual Inspection Summary, Callahan Park, Former Malden MGP Storage and Distribution, Malden, Massachusetts," dated 21 August 2003
62. Haley & Aldrich, Inc., "Immediate Response Action (IRA) Completion Report, RTN 3-0362 & 3-13754, West End Brook - Malden River Culverts, Former Malden MGP Site, Malden, Massachusetts," dated 12 September 2003
63. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 11, Former Manufactured Gas Plant (MGP) Site, Parcel B, 129 Commercial Street, Malden, Massachusetts, RTN 3-0362 and Linked RTN 3-3757, Tier IB Permit 7378," dated 7 October 2003
64. Haley & Aldrich, Inc., "Partial Class C Response Action Outcome (RAOP) Statement, Former Malden Manufactured Gas Plant (MGP) Site, Malden, Massachusetts, RTN 3-0362 and linked RTNs 3-03757, 3-11581, 3-12448, 3-13310, 3-13345, 3-13753, and 3-13754, Tier IB Permit Number 7378," dated 27 February 2004
65. Haley & Aldrich, Inc., "Release Abatement Measure (RAM) Status Report No. 12, Former Manufactured Gas Plant (MGP) Site, Parcel B, 129 Commercial Street, Malden, Massachusetts, RTN 3-0362 and Linked RTN 3-3757, Tier IB Permit 7378," dated 7 April 2004

ATTACHMENT G-2

ONGOING RESPONSE ACTIONS

Description of Current Response Actions:

Parcel B RAM (RTN 3-03757):

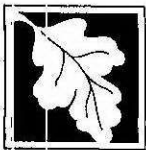
Assessment activities began in 1991 by others on behalf of the property owner(s) in response to the identification of oil and hazardous materials. These investigations detected concentrations of VOC compounds (BTEX and naphthalene) in soil and groundwater greater than reportable concentrations, and detected elevated concentrations of VOCs in indoor air in the commercial building on the property. RTN 3-03757 for the 129 Commercial Street property was linked to the former Malden MGP Site RTN 3-0362 on 6 February 1997. An MCP Release Abatement Measure (RAM) is ongoing and includes the installation and maintenance of a mechanical sub-slab venting system and quarterly monitoring of indoor air. As described in the Phase II report, these additional response actions have resulted in a condition of No Significant Risk.

This RAM was initiated to address concentrations of VOCs detected in indoor air at 129 Commercial Street. The stated objective of the RAM Plan submitted to MADEP in July 1998 was to seal portions of the floor slab that were identified as VOC vapor migration pathways through the floor slab in order to reduce VOC concentrations in indoor air. The RAM was modified on 9 April 1999 to include the installation of a sub-slab venting system. The RAM has involved quarterly indoor air monitoring, a pilot floor-sealing program, and the installation of a pilot scale, sub-slab ventilation system.

Currently, Horizontal Directional Drilling is being evaluated as a means to install an enhanced system at 129 Commercial Street. As part of the HDD evaluation, a pilot test of the existing system was conducted in May 2004. The duration of the Parcel B RAM is unknown and is anticipated to last a period of years.

Copy of Permit Fee Application Payment to Commonwealth of Massachusetts DEP

(Haley & Aldrich Check No. 120739)



Enter your transmittal number

W 055258

Transmittal Number

Your unique Transmittal Number can be accessed online: <http://www.state.ma.us/scripts/dep/trasmfrm.stm> or call DEP's InfoLine at 617-338-2255 or 800-462-0444 (from 508, 781, and 978 area codes).

Massachusetts Department of Environmental Protection

Transmittal Form for Permit Application and Payment

1. Please type or print. A separate Transmittal Form must be completed for each permit application.

2. Make your check payable to the Commonwealth of Massachusetts and mail it with a copy of this form to: DEP, P.O. Box 4062, Boston, MA 02211.

3. Three copies of this form will be needed.

Copy 1 - the original must accompany your permit application. Copy 2 must accompany your fee payment. Copy 3 should be retained for your records

4. Both fee-paying and exempt applicants must mail a copy of this transmittal form to:

DEP
P.O. Box 4062
Boston, MA
02211

* Note:
For BWSC Permits,
enter the LSP.

A. Permit Information

BWSC 20

Tier I Permit Extension

SEP 23 2004

1. Permit Code: 7 or 8 character code from permit instructions

2. Name of Permit Category

Permit to continue MCP Comprehensive Response Actions

3. Type of Project or Activity

B. Applicant Information - Firm or Individual

Massachusetts Electric Company

1. Name of Firm - Or, if party needing this approval is an individual enter name below:

2. Last Name of Individual

3. First Name of Individual

4. MI

25 Research Drive

5. Street Address

Westborough

MA

01582

(508) 389-4296

6. City/Town

7. State

8. Zip Code

9. Telephone #

10. Ext. #

Michele V. Leone

11. Contact Person

12. e-mail address (optional)

C. Facility, Site or Individual Requiring Approval

Former Malden Manufactured Gas Plant (MGP) Facility

1. Name of Facility, Site Or Individual

100 Commercial Street

2. Street Address

Malden

MA

02148

3. City/Town

4. State

5. Zip Code

6. Telephone #

7. Ext. #

8. DEP Facility Number (if Known)

9. Federal I.D. Number (if Known)

3-0362

10. BWSC Tracking # (if Known)

D. Application Prepared by (if different from Section B)*

Haley & Aldrich, Inc.

1. Name of Firm Or Individual

800 Connecticut Boulevard, Suite 100

2. Address

East Hartford

CT

06108

(860) 290-3131

3. City/Town

4. State

5. Zip Code

6. Telephone #

7. Ext. #

Richard P. Standish, PG, LSP

8. Contact Person

2242

9. LSP Number (BWSC Permits only)

E. Permit - Project Coordination

1. Is this project subject to MEPA review? ☐ yes ☒ no
If yes, enter the project's EOE file number - assigned when an Environmental Notification Form is submitted to the MEPA unit:

EOEA File Number

F. Amount Due

Special Provisions:

1. ☐ Fee Exempt (city, town or municipal housing authority)(state agency if fee is \$100 or less).
There are no fee exemptions for BWSC permits, regardless of applicant status.
2. ☐ Hardship Request - payment extensions according to 310 CMR 4.04(3)(c).
3. ☐ Alternative Schedule Project (according to 310 CMR 4.05 and 4.10).
4. ☐ Homeowner (according to 310 CMR 4.02).

DEP Use Only

Permit No:

Rec'd Date:

Reviewer:

120739

\$1,200.00

9/15/04

Check Number

Dollar Amount

Date

**Copies of Notification Letters and Legal Notice
Submitted to City of Malden Municipal Representatives**

RECEIVED

by hand delivery

SEP 20 2004

Haley & Aldrich, Inc.

Haley & Aldrich, Inc.
465 Medford St.
Suite 2200
Boston, MA 02129-1400
Tel: 617.886.7400
Fax: 617.886.7600
HaleyAldrich.com

**HALEY &
ALDRICH**

16 September 2004
File No. 06558-722

City of Malden Office of the Mayor
200 Pleasant Street
Malden, Massachusetts 02148

Attention: Mayor Richard C. Howard

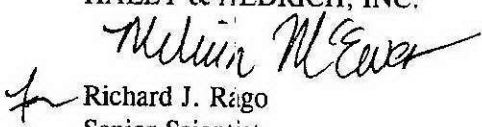
Subject: Notice of Tier I Permit Extension Application
Former Malden Manufactured Gas Plant (MGP) Site
Malden, Massachusetts
RTN 3-0362
Tier IB Permit No. 7378

Ladies and Gentlemen:

On behalf of Massachusetts Electric Company (MEC), and in accordance with the public notification requirements contained in 310 CMR 40.0703(8)(a) of the Massachusetts Contingency Plan (MCP), Haley & Aldrich is notifying you of our intent to publish a copy of the enclosed legal notice in the 20 September 2004 edition of the Malden Evening News/Medford Daily Mercury. The legal notice announces an application for a Tier I Permit Extension for the Former Malden MGP Site in Malden, Massachusetts.

If you have questions concerning this letter, please contact Ms. Michele V. Leone of MEC at (508) 389-4296, or the undersigned at 860-290-3115.

Sincerely yours,
HALEY & ALDRICH, INC.


Richard J. Rago
Senior Scientist

Attachment

Form 05 Legal Notice

cc: DEP Northeast Regional Office
Massachusetts Electric Company; Attn: Ms. Michele V. Leone
KeySpan Energy Delivery New England; Attn: Ms. Patricia Haederle
City of Malden Board of Health; Attn: Mr. Walter F. Carlan

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District of Columbia

Crystal Brown 09/16/04

**NOTICE OF APPLICATION FOR AN EXTENSION OF
A WASTE SITE CLEANUP PERMIT**

**FORMER MALDEN MANUFACTURED GAS PLANT (MGP) SITE
100 COMMERCIAL STREET
MALDEN, MASSACHUSETTS
RELEASE TRACKING NUMBER 3-0362**

Pursuant to the Massachusetts Contingency Plan (310 CMR 40.0703), an application for a Permit Extension is being submitted to the Department of Environmental Protection (DEP) for this site on 29 September 2004. In August 1999, a Tier Re-Classification/Tier IA Permit Application was submitted to DEP. Tier IB Permit 7378 became effective on 28 December 1999. The application proposes to extend the permit for this site to 28 December 2006 for the following rationale:

- A Phase III - Remedial Action Plan (Phase III RAP) was submitted to DEP in June 2003 and a Partial Class C Response Action Outcome (RAOP) Statement was submitted in February 2004. A Permit Extension is required to complete Comprehensive Response Actions at the disposal site as outlined in the Phase III RAP in accordance with the schedule outlined in the RAOP.

Once a site has been classified as Tier I, a permit is required to proceed with a Comprehensive Remedial Response Process. Anyone interested in reviewing the Permit Extension application should notify DEP by writing to the Massachusetts Department of Environmental Protection, Bureau of Waste Site Cleanup, Permit Section, Northeast Regional Office, 35 Congress Street, Salem, Massachusetts by 19 October 2004. Files are available for review on Tuesdays, Wednesdays and Thursdays from 9 AM until 12 PM by appointment only. Interested persons may submit written comments related to the Permit Application within 21 days of the publication of the legal notice required by 310 CMR 40.0703(8)(a)1. Such written comments shall be submitted to the Department by mail or hand delivery during normal Department business hours and to the Permit applicant. Anyone who fails to notify DEP in writing of his/her interest in commenting on the application by the above date may be deemed to have waived his/her rights, if any, to appeal DEP's permit decision or to intervene in an adjudicatory proceeding with respect to this application, pursuant to 310 CMR 40.0770(2).

M.G.L. c. 21E and the Massachusetts Contingency Plan provide additional opportunities for public notice of and involvement in decisions regarding response actions at disposal sites: 1) The Chief Municipal Official and Board of Health of the community in which the site is located will be notified of major milestones and events, pursuant to 310 CMR 40.1403; and 2) Upon receipt of a petition from ten or more residents of the municipality in which the disposal site is located, or of a municipality potentially affected by a disposal site, a plan for involving the public in decisions regarding response actions at the site will be prepared and implemented, pursuant to 310 CMR 40.1405.

To obtain more information on this disposal site and the opportunities for public involvement during its remediation, please contact Michele V. Leone, Senior Environmental Engineer, Massachusetts Electric Company, 25 Research Drive, Westborough, MA 01582 at (508) 389-4296.

Haley & Aldrich, Inc.
465 Medford St.
Suite 2200
Boston, MA 02129-1400
Tel: 617.886.7400
Fax: 617.886.7600
HaleyAldrich.com

by hand delivery

**HALEY &
ALDRICH**

16 September 2004
File No. 06558-722

City of Malden Board of Health
200 Pleasant Street
Malden, Massachusetts 02148

Attention: Mr. Christopher Webb
Director of Public Health

Subject: Notice of Tier I Permit Extension Application
Former Malden Manufactured Gas Plant (MGP) Site
Malden, Massachusetts
RTN 3-0362
Tier IB Permit No. 7378

Ladies and Gentlemen:

OFFICES

Cleveland
Ohio

Dayton
Ohio

Detroit
Michigan

Hartford
Connecticut

Kansas City
Kansas

Los Angeles
California

Manchester
New Hampshire

Parsippany
New Jersey

Portland
Maine

Rochester
New York

San Diego
California

Santa Barbara
California

Tucson
Arizona

Washington
District of Columbia

On behalf of Massachusetts Electric Company (MEC), and in accordance with the public notification requirements contained in 310 CMR 40.0703(8)(a) of the Massachusetts Contingency Plan (MCP), Haley & Aldrich is notifying you of our intent to publish a copy of the enclosed legal notice in the 20 September 2004 edition of the Malden Evening News/Medford Daily Mercury. The legal notice announces an application for a Tier I Permit Extension for the Former Malden MGP Site in Malden, Massachusetts.

If you have questions concerning this letter, please contact Ms. Michele V. Leone of MEC at (508) 389-4296, or the undersigned at 860-290-3115.

Sincerely yours,
HALEY & ALDRICH, INC.



for Richard J. Rago
Senior Scientist

Attachment
Form 05 Legal Notice

cc: DEP Northeast Regional Office
Massachusetts Electric Company; Attn: Ms. Michele V. Leone
KeySpan Energy Delivery New England; Attn: Ms. Patricia Haederle
City of Malden, Chief Municipal Officer; Attn: Mayor Richard C. Howard

Crystal Brown 09/16/04

**NOTICE OF APPLICATION FOR AN EXTENSION OF
A WASTE SITE CLEANUP PERMIT**

**FORMER MALDEN MANUFACTURED GAS PLANT (MGP) SITE
100 COMMERCIAL STREET
MALDEN, MASSACHUSETTS
RELEASE TRACKING NUMBER 3-0362**

Pursuant to the Massachusetts Contingency Plan (310 CMR 40.0703), an application for a Permit Extension is being submitted to the Department of Environmental Protection (DEP) for this site on 29 September 2004. In August 1999, a Tier Re-Classification/Tier IA Permit Application was submitted to DEP. Tier IB Permit 7378 became effective on 28 December 1999. The application proposes to extend the permit for this site to 28 December 2006 for the following rationale:

- A Phase III - Remedial Action Plan (Phase III RAP) was submitted to DEP in June 2003 and a Partial Class C Response Action Outcome (RAOP) Statement was submitted in February 2004. A Permit Extension is required to complete Comprehensive Response Actions at the disposal site as outlined in the Phase III RAP in accordance with the schedule outlined in the RAOP.

Once a site has been classified as Tier I, a permit is required to proceed with a Comprehensive Remedial Response Process. Anyone interested in reviewing the Permit Extension application should notify DEP by writing to the Massachusetts Department of Environmental Protection, Bureau of Waste Site Cleanup, Permit Section, Northeast Regional Office, 35 Congress Street, Salem, Massachusetts by 19 October 2004. Files are available for review on Tuesdays, Wednesdays and Thursdays from 9 AM until 12 PM by appointment only. Interested persons may submit written comments related to the Permit Application within 21 days of the publication of the legal notice required by 310 CMR 40.0703(8)(a)1. Such written comments shall be submitted to the Department by mail or hand delivery during normal Department business hours and to the Permit applicant. Anyone who fails to notify DEP in writing of his/her interest in commenting on the application by the above date may be deemed to have waived his/her rights, if any, to appeal DEP's permit decision or to intervene in an adjudicatory proceeding with respect to this application, pursuant to 310 CMR 40.0770(2).

M.G.L. c. 21E and the Massachusetts Contingency Plan provide additional opportunities for public notice of and involvement in decisions regarding response actions at disposal sites: 1) The Chief Municipal Official and Board of Health of the community in which the site is located will be notified of major milestones and events, pursuant to 310 CMR 40.1403; and 2) Upon receipt of a petition from ten or more residents of the municipality in which the disposal site is located, or of a municipality potentially affected by a disposal site, a plan for involving the public in decisions regarding response actions at the site will be prepared and implemented, pursuant to 310 CMR 40.1405.

To obtain more information on this disposal site and the opportunities for public involvement during its remediation, please contact Michele V. Leone, Senior Environmental Engineer, Massachusetts Electric Company, 25 Research Drive, Westborough, MA 01582 at (508) 389-4296.

**NOTICE OF APPLICATION FOR AN EXTENSION OF
A WASTE SITE CLEANUP PERMIT**

**FORMER MALDEN MANUFACTURED GAS PLANT
(MGP) SITE
100 COMMERCIAL STREET
MALDEN, MASSACHUSETTS
RELEASE TRACKING NUMBER 3-0362**

Pursuant to the Massachusetts Contingency Plan (310 CMR 40.0703), an application for a Permit Extension is being submitted to the Department of Environmental Protection (DEP) for this site on 29 September 2004. In August 1999, a Tier Re-Classification/Tier IA Permit Application was submitted to DEP. Tier IB Permit 7378 became effective on 28 December 1999. The application proposes to extend the permit for this site to 28 December 2006 for the following rationale:

- A Phase III - Remedial Action Plan (Phase III RAP) was submitted to DEP in June 2003 and a Partial Class C Response Action Outcome (RAOP) Statement was submitted in February 2004. A Permit Extension is required to complete Comprehensive Response Actions at the disposal site as outlined in the Phase III RAP in accordance with the schedule outlined in the RAOP.

Once a site has been classified as Tier I, a permit is required to proceed with a Comprehensive Remedial Response Process. Anyone interested in reviewing the Permit Extension application should notify DEP by writing to the Massachusetts Department of Environmental Protection, Bureau of Waste Site Cleanup, Permit Section, Northeast Regional Office, 35 Congress Street, Salem, Massachusetts by 19 October 2004. Files are available for review on Tuesdays, Wednesdays and Thursdays from 9 AM until 12 PM by appointment only. If anyone notifies DEP of his or her interest in reviewing or submitting comment on the application, DEP will conduct a public comment review period of twenty (20) days which shall run concurrently with DEP's Initial Technical Review of the application. Anyone who fails to notify DEP in writing of his/her interest in commenting on the application by the above date may be deemed to have waived his/her rights, if any, to appeal DEP's permit decision or to intervene in an adjudicatory proceeding with respect to this application, pursuant to 310 CMR 40.0770(2).

M.G.L. c. 21E and the Massachusetts Contingency Plan provide additional opportunities for public notice of and involvement in decisions regarding response actions at disposal sites: 1) The Chief Municipal Official and Board of Health of the community in which the site is located will be notified of major milestones and events, pursuant to 310 CMR 40.1403; and 2) Upon receipt of a petition from ten or more residents of the municipality in which the disposal site is located, or of a municipality potentially affected by a disposal site, a plan for involving the public in decisions regarding response actions at the site will be prepared and implemented, pursuant to 310 CMR 40.1405.

To obtain more information on this disposal site and the opportunities for public involvement during its remediation, please contact Michele V. Leone, Senior Environmental Engineer, Massachusetts Electric Company, 25 Research Drive, Westborough, MA 01582 at (508) 389-4296.

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