

**Buckley & Mann, Inc.**  
**14 Bush Pond Road**  
**Norfolk, MA 02056**

September 18, 2000

Norfolk  
17 Lawrence St  
3-173  
N/A

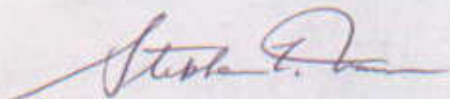
SCANNED

Department of Environmental Protection  
Northeast Regional Office  
205A Lowell Street  
Wilmington, MA 01887

Enclosed please find a semi-annual Status Report for the Release Abatement Measure at the Buckley & Mann property at 17 Lawrence Street, Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173.

If you have any questions, please contact me at (781) 828-0029 X3427, or (508) 528-4296.

Sincerely,



Stephen L. Mann



RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM

LM  
Release Tracking  
Number  
3 - 173

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

A. SITE LOCATION:

Site Name: Buckley and Mann, Inc.  
(optional)  
Street 17 Lawrence Street Location Aid: Bush Pond  
City/Town: Norfolk ZIP Code: 02056-0000

Check here if a Tier Classification Submittal has been provided to DEP for this Release Tracking Number.

Related Release Tracking Numbers That This RAM or URAM Addresses: \_\_\_\_\_

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

- Submit a RAM Plan (complete Sections A, B, C, D, E, F, J, K, L and M).  
 Check here if this RAM Plan is an update or modification of a previously approved written RAM Plan. Date Submitted: \_\_\_\_\_
- Submit a RAM Status Report (complete Sections A, B, C, E, J, K, L and M).
- Submit a RAM Completion Statement (complete Sections A, B, C, D, E, G, J, K, L and M).
- Confirm or Provide URAM Notification (complete Sections A, B, H, K, L and M).
- Submit a URAM Status Report (complete Sections A, B, C, E, J, K, L and M).
- Submit a URAM Completion Statement (complete Sections A, B, C, D, E, I, J, K, L and M).

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. SITE CONDITIONS:

- Check here if the source of the Release or Threat of Release is known.  
If yes, check all sources that apply:  UST  Pipe/Hose/Line  AST  Drums  Transformer  Boat  Tanker Truck  Vehicle  Other Specify: Bldg debris, coal ash, and textile plant waste
- Identify Media and Receptors Affected: (check all that apply)  
 Air  Groundwater  Surface Water  Sediments  Soil  
 Wetlands  Storm Drain  Paved Surface  Private Well  Public Water Supply  Zone 2  Residence  
 School  Unknown  Other Specify: \_\_\_\_\_

Identify Release and/or Threat of Release Conditions at Site: (check all that apply)

- 2 and 72 Hour Reporting Condition(s)  120 Day Reporting Condition(s)  Other Condition(s)

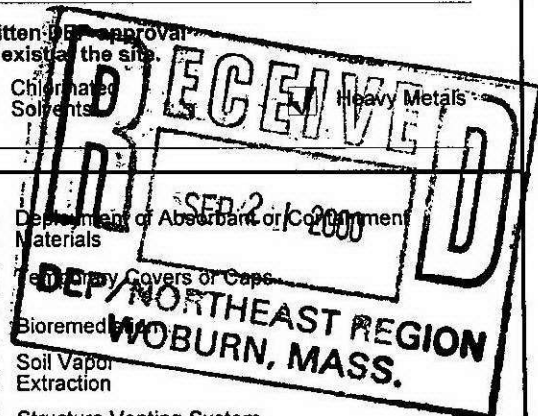
Describe Metals, PAH, and TPH from building debris, coal ash and textile plant

RAMs may be conducted concurrently with an IRA only with written DEP approval.  
URAMs may not be conducted if any 2 or 72 Hour conditions exist at the site.

Identify Oils and Hazardous Materials Released: (check all that apply)  
 Oils  Chlorinated Solvents  Heavy Metals  
 Others Specify: PAH and TPH

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

- Assessment and/or Monitoring Only
- Excavation of Contaminated Soils  
 Re-use, Recycling or Treatment  
 On Site  Off Site Est. Vol.: \_\_\_\_\_ cubic yards  
Describe: \_\_\_\_\_
- Store  On Site  Off Site Est. Vol.: \_\_\_\_\_ cubic yards
- Department of Absorbent or Containment Materials
- Temporary Covers or Caps
- Bioremediation
- Soil Vapor Extraction
- Structure Venting System
- Product or NAPL Recovery



SECTION D IS CONTINUED ON THE NEXT PAGE.



RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking  
Number

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Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

D. DESCRIPTION OF RESPONSE ACTIONS (continued):

- Landfill  Cover  Disposal Est. Vol.: 315 cubic yards
  - Removal of Drums, Tanks or Containers
  - Removal of Other Contaminated Media
  - Other Response Actions Describe On-site consolidation and covering of 4,550 cy soil
- See 310 CMR 40.0442 for limitations on the scope and type of RAMs.  
See 310 CMR 40.0464 for performance standards for URAMs.
- Check here if this RAM or URAM involves the use of Innovative Technologies. DEP is interested in using this information to aid in creating an Innovative Technologies Clearinghouse.
- Describe Technologies: \_\_\_\_\_

E. TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste has been sent to an off-site facility, answer the following questions)

Name of Facility: Chemical Waste Management - Turnkey Facility

Town and State: Rochester, NH

Quantity of Remediation Waste Transported to Date: 315 Tons (no change from previous semi-annual Status Rpt.)

F. RAM PLAN:

- Check here if this RAM Plan received previous oral approval from DEP as a continuation of a Limited Removal Action (LRA).  
Date of Oral Approval: \_\_\_\_\_
- If a RAM Compliance Fee is required, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. See 310 CMR 40.0444(2) to learn when a fee is not required.
- Check here if the RAM Plan is proposed for a Transition Site. If this is the case, you may need to attach an LSP Evaluation Opinion prior to undertaking the RAM, if not previously provided. See 310 CMR 40.0600 for further information about Transition Sites.

G. RAM COMPLETION STATEMENT:

- If a RAM Compliance Fee is required in connection with submission of the RAM Completion Statement, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. You owe this fee when submitting a RAM Completion Statement if you received oral approval of a RAM that continued an LRA, and have NOT previously submitted a RAM Plan and accompanying fee.
- If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the RAM Completion Statement, you must submit a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the RAM Completion Statement.

H. URAM NOTIFICATION:

- Identify Location Type: (check all that apply)  Public Right of Way  Utility Easement  Private Property
- Identify Utility Type: (check all that apply)  Sanitary/Combined Sewerage  Water  Drainage  Natural Gas
- Telephone  Steam Lines  Telecommunications  Electric  Other Specify \_\_\_\_\_
- Check here if you provided DEP with previous oral notification of this URAM. Date of Oral Notice: \_\_\_\_\_
  - Check here if the property owner was NOT contacted prior to initiation of the URAM. If this is the case, you must attach an explanation of why the owner was not contacted, including the date and time when contact ultimately occurred.
  - Check here if this URAM will occur in connection with the construction of new public utilities. If this is the case, document the nature and extent of encountered contamination, the scope and expense of necessary mitigation and the benefits and limitations of project alternatives.
- With the exception stated below, the person undertaking the URAM must provide the name and license number of an LSP engaged or employed in connection with the URAM:
- LSP Name: \_\_\_\_\_ LSP License Number: \_\_\_\_\_
- LSP information is not required if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by a Hazardous Material or a mixture of a Hazardous Material and Oil.





RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking  
Number

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Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

I. URAM COMPLETION STATEMENT:

Check here if this URAM was limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated by either a Hazardous Material or a mixture of a Hazardous Material and Oil.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the URAM Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the URAM Completion Statement.

J. LSP OPINION:

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

> if Section B of this form indicates that a Release Abatement Measure Plan is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that a Release Abatement Measure Status Report or a Utility-Related Abatement Measure Status Report is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

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

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

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

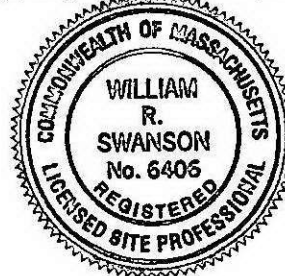
LSP Name: William R. Swanson LSP #: 6406 Stamp:

Telephone: 617-452-6274 Ext.: 8458

FAX: 617-452-8274 (optional)

Signature: [Handwritten Signature]

Date: 9/14/07



An LSP Opinion is not required for a Utility-Related Abatement Measure Notification.

An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by Hazardous Material or a mixture of Hazardous Material and Oil.

K. PERSON UNDERTAKING RAM OR URAM:

Name of Organization: Buckley and Mann Inc.

Name of Contact: Richard Mann/ Stephen Mann Title: Owners

Street: 15 Bush Pond Lane

City/Town: Norfolk State MA ZIP Code: 02056-0000

Telephone: 781-828-0029 Ext.: 3442 FAX: (optional)

Check here if there has been a change in person undertaking the RAM or URAM.





RELEASE & UTILITY-RELATED ABATEMENT  
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Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or URAM: (check one)

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

M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM:

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

By: [Signature] Title: TREASURER  
(signature)

For Buckley and Mann Inc. Date: 9/18/00  
(print name of person or entity recorded in Section K)

Enter address of person providing certification, if different from address recorded in Section K:  
Street: N/A  
City/Town: \_\_\_\_\_ State \_\_\_\_\_ ZIP Code: \_\_\_\_\_  
Telephone: \_\_\_\_\_ Ext. \_\_\_\_\_ FAX: \_\_\_\_\_  
(optional)

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

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC.  
CAMBRIDGE, MASSACHUSETTS

September 2000

Robert A. Dangel  
Licensed Site Professional # 7798

William R. Swanson  
Licensed Site Professional # 6406

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

1. Previous filing

The original RAM Plan was filed on May 28, 1996, and the revised RAM plan was filed in December 1997. The previous RAM Status report was filed in March 2000.

2. Work since the last report

None. Sampling and analysis work at the former dyehouse wastewater treatment impoundments must wait until the groundwater table drops, in late summer 2000. (See below.)

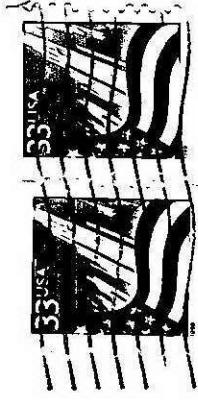
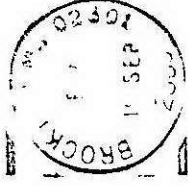
3. Work planned

The following tasks remain to complete the work in 2000:

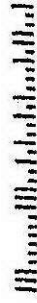
- Obtain a Certificate of Compliance from the Norfolk Conservation Commission for work subject to the Order of Conditions for the consolidation area cover. Per the Conservation Commission's request, the Activity and Use under the MCP will be completed before the Commission will issue a Certificate.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.
- Sample soils from the bottom of former dyehouse wastewater treatment impoundments for PAH compounds, and determine the closure requirements (if any) for the impoundments.  
The ground water has dropped low enough in late summer to allow sampling, which should be completed by the end of September 2000.



Buckley & Mann, Inc.  
14 Bush Pond Road  
Norfolk, MA 02056



Department of Environmental Protection  
Northeast Regional Office  
205A Lowell Street  
Wilmington, MA 01887



**Buckley & Mann, Inc.**  
14 Bush Pond Road  
Norfolk, MA 02056  
December 8, 1999

N/A  
NORFOLK  
17 LAURENCE ST  
SCANNED-0173

Department of Environmental Protection  
Northeast Regional Office  
205 Lowell Street  
Wilmington, MA 01887

Enclosed please find a Tier II Extension request for the Buckley & Mann property in Norfolk, Massachusetts. The site is Bureau of Waste Cleanup #3-0173.

If you have any questions, please contact Richard Mann at (781) 828-0029 X3442, or Stephen Mann at (781) 828-0029 X3427.



Stephen L. Mann, Treasurer



**TIER CLASSIFICATION, TIER II EXTENSION &  
TIER II TRANSFER TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

3 - 173

**A. DISPOSAL SITE LOCATION:**

Disposal Site Name: Buckley & Mann, Inc

Street: 17 Lawrence Street Location Aid: Bush Pond

City/Town: Norfolk, MA ZIP Code: 02056-0000

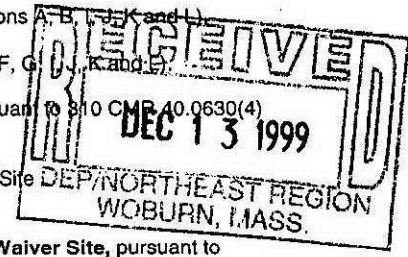
Related Release Tracking Numbers That This Submittal Will Address: \_\_\_\_\_

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

- Submit a new or revised Tier Classification Submittal for a Tier I Site, including a Numerical Ranking Scoresheet (complete Sections A, B, C, I, J, K and L).
- Submit a new or revised Tier Classification Submittal for a Tier II Site, including a Numerical Ranking Scoresheet (complete Sections A, B, C, F, G, I, J, K and L).
- Submit a Notice that an additional Release Tracking Number(s) is (are) being linked to this Tier Classified Site and rescoring is not required at this time (complete Sections A, B, J, K and L). If this submittal is for a Tier I Site, you must also submit a Minor Permit Modification Transmittal Form (BWSC-109).

List Additional Release Tracking Number(s): \_\_\_\_\_

- Submit a Phase I Completion Statement supporting a Tier Classification Submittal (complete Sections A, B, J, K and L).
- Submit a Tier II Extension Submittal for Response Actions at a Tier II Site (complete Sections A, B, D, F, G, J, K and L).
- Submit a Tier II Extension Submittal for Response Actions taken after expiration of a Waiver, pursuant to 310 CMR 40.0630(4) (complete Sections A, B, D, F, J, K and L, and also complete Sections G and I or Section H).\*
- Submit a Tier II Transfer Submittal for a change in person(s) undertaking Response Actions at a Tier II Site (complete Sections A, B, E, F, G, I, J, K, L, M, N and O).
- Submit a Tier II Transfer Submittal for a change in person(s) undertaking Response Actions at a Waiver Site, pursuant to 310 CMR 40.0630(6) (complete Sections A, B, E, F, J, K, L, M, N and O, and also complete Sections G and I or Section H).\*



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.

\*NOTE: The Waiver expires on the effective date of this submittal and all further Response Actions must be taken as a Tier II Site.

**C. TIER CLASSIFICATION SUBMITTAL:**

Numerical Ranking Score for Disposal Site: (from Numerical Ranking Scoresheet) \_\_\_\_\_

Proposed Tier Classification of Disposal Site: (check one)  Tier IA  Tier IB  Tier IC  Tier II

Check which, if any, of the Tier I inclusionary criteria are met by the Disposal Site, pursuant to 310 CMR 40.0520:

- Groundwater is located within an Interim Wellhead Protection Area or a Zone II, and there is evidence of groundwater contamination by an Oil or Hazardous Material at the time of Tier Classification at concentrations equal to or exceeding the applicable RCGW-1 Reportable Concentration set forth in 310 CMR 40.0360.
- An Imminent Hazard is present at the time of Tier Classification.
- Check here if this Tier Classification revises a previous submittal for this Disposal Site. You must include a revised Numerical Ranking Scoresheet with this submittal. If a Tier I Permit has been issued, you may also need to submit a Major Permit Modification Application (BWSC 10).

If incorporating additional Release(s) into the Disposal Site, list Release Tracking Number(s): \_\_\_\_\_

**D. TIER II EXTENSION SUBMITTAL REQUIREMENTS:**

State the expiration date of the Tier II Classification or Waiver for the Disposal Site, whichever is applicable: 02/22/00

Attach a statement summarizing why a Permanent or Temporary Solution has not been achieved at the Disposal Site. A Tier II Extension is effective for a period of one year beyond the current expiration date of the Tier II Classification or Waiver.

**E. TIER II TRANSFER SUBMITTAL REQUIREMENTS:**

State the proposed effective date of the change in person(s) undertaking Response Actions at the Disposal Site: \_\_\_\_\_

Attach a statement summarizing the reasons for the proposed change in person(s) undertaking the Response Actions. All Response Actions must be completed by the deadline applicable to the person who first filed either a Tier Classification Submittal for the Disposal Site or received a Waiver of Approvals.





**TIER CLASSIFICATION, TIER II EXTENSION &  
TIER II TRANSFER TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

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**F. DISPOSAL SITE COMPLIANCE HISTORY SUMMARY:**

- > If providing either a Tier Classification Submittal for a Tier II Site or a Tier II Extension Submittal for a Waiver Site, the person named in Section J must provide a Compliance History.
- > If providing a Tier II Extension Submittal for a Tier II Site, the person named in Section J must update their Compliance History since the effective date of the Tier II Classification.
- > If providing a Tier II Transfer Submittal for a Tier II or Waiver Site, the person named in Section M must provide a Compliance History.

Compliance History for (provide only one name per History): Buckley & Mann, Inc.

Check here if there has been no change to the Compliance History of the person named above (Extension Submittal for a Tier II Site ONLY).

List all permits or licenses that have been issued by the Department that are relevant to this Disposal Site:

PROGRAM:	PERMIT NUMBER:	PERMIT CATEGORY:	FACILITY ID:
Air Quality	<u>0</u>		
Hazardous Waste (M.G.L. c. 21C)	<u>0</u>		
Solid Waste	<u>0</u>		
Industrial Wastewater Management	<u>0</u>		
Water Supply	<u>0</u>		
Water Pollution Control/Surface Water	<u>0</u>		
Water Pollution Control/Groundwater	<u>0</u>		
Water Pollution Control/Sewer Connection	<u>0</u>		
Wetland & Waterways	<u>0</u>		

List all other Federal, state or local permits, licenses, certifications, registrations, variances, or approvals that are relevant to this Disposal Site:

ISSUING AUTHORITY OR PROGRAM, OR DOCUMENTATION TYPE:	IDENTIFICATION NUMBER:	DATE ISSUED:
<u>Inactive site</u>		

If needed, attach to this Transmittal Form a statement further describing the Compliance History of this Disposal Site. This statement must describe the compliance history of the person named above with the following:

- (1) DEP regulations; and
- (2) other laws for the protection of health, safety, public welfare and the environment administered or enforced by any other government agency.

Such a statement should identify information such as:

- (1) actions relevant to the Disposal Site taken by the Department to enforce its requirements including, but not limited to, a Notice of Noncompliance (NON), Notice of Intent to Assess Civil Administrative Penalty (PAN), Notice of Intent to Take Response Action (NORA), and an administrative enforcement order;
- (2) administrative consent orders;
- (3) judicial consent judgements;
- (4) similar administrative actions taken by other Federal, state or local agencies;
- (5) civil or criminal actions relevant to the Disposal Site brought on behalf of the DEP or other Federal, state, or local agencies; and
- (6) any additional relevant information.

For each action identified, provide the following information:

- (1) name of the issuing authority, type of action, identification number and date issued;
- (2) description of noncompliance cited;
- (3) current status of the matter; and
- (4) final disposition, if any.



TIER CLASSIFICATION, TIER II EXTENSION &
TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

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G. CERTIFICATION OF ABILITY AND WILLINGNESS:

- > If providing either a Tier II Classification Submittal or a Tier II Extension Submittal, the person who signs this certification MUST be the person named in Section J, or that person's agent.
> If providing a Tier II Transfer Submittal, the person who signs this certification MUST be the person named in Section M, or that person's agent.

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 Transmittal Form and of the person(s) or entity(ies) on whose behalf this submittal is made, and my/that 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.

By: [Signature] Title: President

For: Buckley & Mann, Inc. Date:
(print name of person or entity recorded in Section J or M, as appropriate)

If you are submitting either a Tier II Extension Submittal for a Waiver Site or a Tier II Transfer Submittal for a Waiver Site, you may choose to sign the alternative Ability and Willingness Certification found in Section H in place of providing the certification in Section G and the LSP Opinion in Section I.

H. ALTERNATIVE CERTIFICATION OF ABILITY AND WILLINGNESS:

- > If providing a Tier II Extension Submittal for a Waiver Site, the person who signs this certification MUST be the person named in Section J, or that person's agent
> If providing a Tier II Transfer Submittal for a Waiver Site, the person who signs this certification MUST be the person named in Section M, or that person's agent.

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 Consultant-of-Record for the disposal site which is the subject of this Transmittal Form and of the person(s) or entity(ies) on whose behalf this submittal is made, and my/that 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.

By: Title:
(signature)

For: Date:
(print name of person or entity recorded in Section J or M, as appropriate)

I. LSP OPINION:

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

> if Section B of this form indicates that a Tier I or Tier II Classification Submittal which relies upon a previously submitted Phase I Completion Statement is being submitted, this Tier Classification Submittal has been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that a Phase I Completion Statement or a Tier I or Tier II Classification Submittal which does not rely upon a previously submitted Phase I Completion Statement is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

SECTION I IS CONTINUED ON THE NEXT PAGE



**TIER CLASSIFICATION, TIER II EXTENSION &  
TIER II TRANSFER TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

3 - 173

**I. LSP OPINION: (continued)**

> if Section B of this form indicates that a Tier II Extension Submittal or a Tier II Transfer Submittal is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

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

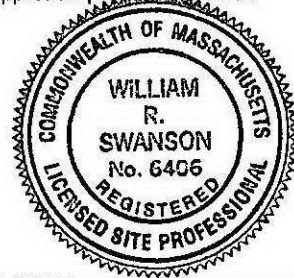
LSP Name: William R. Swanson LSP #: 6406 Stamp:

Telephone: 617-252-8000 Ext.: 8458

FAX: (optional) 617-621-2565

Signature: *William R. Swanson*

Date: 12/6/99



**J. PERSON MAKING SUBMITTAL: (For Transfer Submittals describe person currently undertaking response actions, not transferee)**

Name of Organization: Buckley & Mann, Inc.

Name of Contact: Richard Mann/ Stephen Mann Title: Owners

Street: 14 Bush Pond Lane

City/Town: Norfolk State: MA ZIP Code: 02056-0000

Telephone: 781-821-0029 Ext.: 3442 FAX: (optional) \_\_\_\_\_

**K. RELATIONSHIP TO DISPOSAL SITE OF PERSON MAKING SUBMITTAL: (check one)**

RP or PRP Specify:  Owner  Operator  Generator  Transporter Other RP or PRP: \_\_\_\_\_

Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

Any Other Person Making Submittal Specify Relationship: \_\_\_\_\_

**L. CERTIFICATION OF PERSON MAKING SUBMITTAL:**

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

By: *Richard D. Mann* Title: President  
(signature)

For: Buckley & Mann, Inc. Date: 12/8/99  
(print name of person or entity recorded in Section J)

Enter address of the person providing certification(s), including Ability and Willingness Certification where applicable, if different from address recorded in Section J:

Street: \_\_\_\_\_

City/Town: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: \_\_\_\_\_

Telephone: \_\_\_\_\_ Ext.: \_\_\_\_\_ FAX: (optional) \_\_\_\_\_

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



MCP TIER II EXTENSION REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC.  
CAMBRIDGE, MASSACHUSETTS

December 6, 1999

Robert A. Dangel  
Licensed Site Professional # 7798

William R. Swanson  
Licensed Site Professional # 6406

MCP TIER II EXTENSION REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

The second year of the Tier II extension for this site expires on February 22, 2000.

This report describes the progress made over the last 12 months and plans to complete remediation at the site.

The following work was completed during the 1999 Tier II extension period:

- Preparation of final drawings and specifications to complete the cover over Area 10
- Solicitation of bids and award of a contract for the cover work
- Completion of the Area 10 work.

The Area 10 work included:

- Relocation of approximately 50 cubic yards contaminated soil from Area 5 to the Area 10 consolidation area. This material was overlooked in the May and June 1998 remediation work.
- Addition of approximately 2,000 cubic yards additional sand to complete the three foot thick cover over the geotextile, which marks the top of the contaminated soil layer.
- Application of compost, fertilizer, lime and hydroseed to complete the cover.

The following tasks remain to complete the work in 1999:

- Obtain a Certificate of Compliance from the Norfolk Conservation Commission.
- Sample and analyze soil and groundwater from the two former dyehouse wastewater treatment lagoons for PAH compounds. Based on the analytical results, determine what actions, if any, would be needed to reach a Response Action Outcome for the lagoons. This work was not done in 1999 because high groundwater (and consequently high water level in the lagoons) restricted access.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.

**Buckley & Mann, Inc.**  
**14 Bush Pond Road**  
**Norfolk, MA 02056**

SCANNED

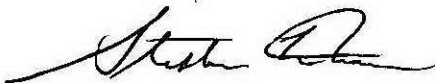
September 23, 1999

Department of Environmental Protection  
Northeast Regional Office  
205 Lowell Street  
Wilmington, MA 01887

Enclosed please find a semi-annual Status Report for the Release Abatement Measure at the Buckley & Mann property at 17 Lawrence Street, Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173.

If you have any questions, please contact me at (781) 828-0029 X3427.

Sincerely,



Stephen L. Mann

9/27



RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC.  
CAMBRIDGE, MASSACHUSETTS

September 1999

Robert A. Dangel  
Licensed Site Professional # 7798

William R. Swanson  
Licensed Site Professional # 6406

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

1. Previous filing

The original RAM Plan was filed on May 28, 1996, and the revised RAM plan was filed in December 1997. The previous RAM Status report was filed in March 1999.

2. Work since the last report

The following tasks were completed over the last six months:

- Specifications and a drawing were prepared for completion of the consolidation area (Area 10) cover. Bids were solicited and a contractor was selected.
- In September 1999, the contractor:
  - removed approximately 50 cubic yards of contaminated soil from Area 5 and placed the material under the consolidation area cover. This material had been overlooked in the May and June 1998 remediation work.
  - added approximately 2,000 cubic yards additional sand and a loam layer to complete the three foot thick cover over the consolidation area, followed by hydroseeding.

3. Work planned

The following tasks remain to complete the work in 1999/2000:

- Obtain a Certificate of Compliance from the Norfolk Conservation Commission for work subject to the Order of Conditions for the consolidation area cover.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.
- Sample soils from the bottom of former dyehouse wastewater treatment impoundments for PAH compounds, and determine the closure requirements (if any) for the impoundments.

ORIGINAL



RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 173

Jy

A. SITE LOCATION:

Site Name: (optional) Buckley and Mann, Inc.  
Street: 17 Lawrence Street Location Aid: Bush Pond  
City/Town: Norfolk, MA ZIP Code: 02056-0000

Check here if a Tier Classification Submittal has been provided to DEP for this Release Tracking Number.

Related Release Tracking Numbers That This RAM or URAM Addresses: \_\_\_\_\_

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

- Submit a RAM Plan (complete Sections A, B, C, D, E, F, J, K, L and M).  
 Check here if this RAM Plan is an update or modification of a previously approved written RAM Plan. Date Submitted: \_\_\_\_\_
- Submit a RAM Status Report (complete Sections A, B, C, E, J, K, L and M).
- Submit a RAM Completion Statement (complete Sections A, B, C, D, E, G, J, K, L and M).
- Confirm or Provide URAM Notification (complete Sections A, B, H, K, L and M).
- Submit a URAM Status Report (complete Sections A, B, C, E, J, K, L and M).
- Submit a URAM Completion Statement (complete Sections A, B, C, D, E, I, J, K, L and M).

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. SITE CONDITIONS:

- Check here if the source of the Release or Threat of Release is known.  
If yes, check all sources that apply:  UST  Pipe/Hose/Line  AST  Drums  Transformer  Boat  
 Tanker Truck  Vehicle  Other Specify: Bldg debris, coal ash, and textile plant waste
- Identify Media and Receptors Affected: (check all that apply)  Air  Groundwater  Surface Water  Sediments  Soil  
 Wetlands  Storm Drain  Paved Surface  Private Well  Public Water Supply  Zone 2  Residence  
 School  Unknown  Other Specify: \_\_\_\_\_

Identify Release and/or Threat of Release Conditions at Site: (check all that apply)  
 2 and 72 Hour Reporting Condition(s)  120 Day Reporting Condition(s)  Other Condition(s)  
Describe: Metals, PAH, and TPH from building debris, coal ash and textile plant

RAMs may be conducted concurrently with an IRA only with written DEP approval  
URAMs may not be conducted if any 2 or 72 Hour conditions exist at the site.

Identify Oils and Hazardous Materials Released: (check all that apply)  Oils  Chlorinated Solvents  Heavy Metals  
 Others Specify: PAH and TPH

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

- Assessment and/or Monitoring Only
- Excavation of Contaminated Soils  
 Re-use, Recycling or Treatment  
○ On Site ○ Off Site Est. Vol.: \_\_\_\_\_ cubic yards  
Describe: \_\_\_\_\_
- Store ○ On Site ○ Off Site Est. Vol.: \_\_\_\_\_ cubic yards
- Deployment of Absorbant or Containment Materials
- Temporary Covers or Caps
- Bioremediation
- Soil Vapor Extraction
- Structure Venting System
- Product or NAPL Recovery

SECTION D IS CONTINUED ON THE NEXT PAGE.



**RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

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**D. DESCRIPTION OF RESPONSE ACTIONS (continued):**

- Landfill  Cover  Disposal Est. Vol.: 315 cubic yards  Groundwater Treatment Systems
- Removal of Drums, Tanks or Containers  Air Sparging
- Describe: \_\_\_\_\_  Temporary Water Supplies
- Removal of Other Contaminated Media  Temporary Evacuation or Relocation of Residents
- Specify Type and Volume: \_\_\_\_\_  Fencing and Sign Posting
- Other Response Actions Describe: On-site consolidation and covering of 4,550 cy soil
- See 310 CMR 40.0442 for limitations on the scope and type of RAMs.  
See 310 CMR 40.0464 for performance standards for URAMs.**
- Check here if this RAM or URAM involves the use of Innovative Technologies. DEP is interested in using this information to aid in creating an Innovative Technologies Clearinghouse.
- Describe Technologies: \_\_\_\_\_

**E. TRANSPORT OF REMEDIATION WASTE:** (if Remediation Waste has been sent to an off-site facility, answer the following questions)

Name of Facility: Chemical Waste Management- Turnkey Facility

Town and State: Rochester, NH

Quantity of Remediation Waste Transported to Date: 315 Tons (no change from previous semi-annual Status Rpt.)

**F. RAM PLAN:**

- Check here if this RAM Plan received previous oral approval from DEP as a continuation of a Limited Removal Action (LRA).  
Date of Oral Approval: \_\_\_\_\_
- If a RAM Compliance Fee is required, check here to certify that the fee has been submitted. You **MUST** attach a photocopy of the payment. See 310 CMR 40.0444(2) to learn when a fee is not required.
- Check here if the RAM Plan is proposed for a Transition Site. If this is the case, you may need to attach an LSP Evaluation Opinion prior to undertaking the RAM, if not previously provided. See 310 CMR 40.0600 for further information about Transition Sites.

**G. RAM COMPLETION STATEMENT:**

- If a RAM Compliance Fee is required in connection with submission of the RAM Completion Statement, check here to certify that the fee has been submitted. You **MUST** attach a photocopy of the payment. You owe this fee when submitting a RAM Completion Statement if you received oral approval of a RAM that continued an LRA, and have NOT previously submitted a RAM Plan and accompanying fee.
- If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the RAM Completion Statement, you must submit a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the RAM Completion Statement.**

**H. URAM NOTIFICATION:**

- Identify Location Type: (check all that apply)  Public Right of Way  Utility Easement  Private Property
- Identify Utility Type: (check all that apply)  Sanitary/Combined Sewerage  Water  Drainage  Natural Gas
- Telephone  Steam Lines  Telecommunications  Electric  Other Specify: \_\_\_\_\_
- Check here if you provided DEP with previous oral notification of this URAM. Date of Oral Notice: \_\_\_\_\_
  - Check here if the property owner was NOT contacted prior to initiation of the URAM. If this is the case, you must attach an explanation of why the owner was not contacted, including the date and time when contact ultimately occurred.
  - Check here if this URAM will occur in connection with the construction of new public utilities. If this is the case, document the nature and extent of encountered contamination, the scope and expense of necessary mitigation and the benefits and limitations of project alternatives.
- With the exception stated below, the person undertaking the URAM must provide the name and license number of an LSP engaged or employed in connection with the URAM:
- LSP Name: \_\_\_\_\_ LSP License Number: \_\_\_\_\_
- LSP information is not required if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by a Hazardous Material or a mixture of a Hazardous Material and Oil.





**RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

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**I. URAM COMPLETION STATEMENT:**

Check here if this URAM was limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated by either a Hazardous Material or a mixture of a Hazardous Material and Oil.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the URAM Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the URAM Completion Statement.

**J. LSP OPINION:**

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

> if Section B of this form indicates that a **Release Abatement Measure Plan** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that a **Release Abatement Measure Status Report** or a **Utility-Related Abatement Measure Status Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

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

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

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

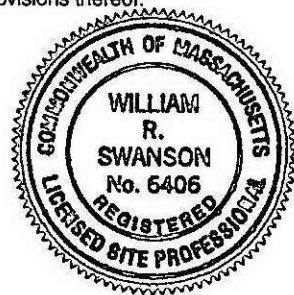
LSP Name: William R. Swanson LSP #: 6406 Stamp:

Telephone: 617-252-8000 Ext.: 8458

FAX: (optional) 617-621-2565

Signature: [Handwritten Signature]

Date: 9/22/99



An LSP Opinion is not required for a Utility-Related Abatement Measure Notification.

An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by Hazardous Material or a mixture of Hazardous Material and Oil.

**K. PERSON UNDERTAKING RAM OR URAM:**

Name of Organization: Buckley and Mann Inc.

Name of Contact: Richard Mann/ Stephen Mann Title: Owners

Street: 14 Bush Pond Lane

City/Town: Norfolk State: MA ZIP Code: 02056-0000

Telephone: 781-828-0029 Ext.: 3427 FAX: (optional) 3442

Check here if there has been a change in person undertaking the RAM or URAM.



**RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 173

**L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or URAM:** (check one)

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

**M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM:**

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

By: *Stephen L. Mann* Title: TREASURER  
(signature)

For: Buckley and Mann Inc. Date: 9/23/89  
(print name of person or entity recorded in Section K)

Enter address of person providing certification, if different from address recorded in Section K:

Street: N/A  
City/Town: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: \_\_\_\_\_  
Telephone: \_\_\_\_\_ Ext.: \_\_\_\_\_ FAX: (optional) \_\_\_\_\_

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

**Buckley & Mann, Inc.**  
**14 Bush Pond Road**  
**Norfolk, MA 02056**

SCANNED

March 20, 2000

Department of Environmental Protection  
Northeast Regional Office  
205 Lowell Street  
Wilmington, MA 01887

Enclosed please find a semi-annual Status Report for the Release Abatement Measure at the Buckley & Mann property at 17 Lawrence Street, Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173.

If you have any questions, please contact me at (781) 828-0029 X3427.

Sincerely,



Stephen L. Mann



RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

3 - 173

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

A. SITE LOCATION:

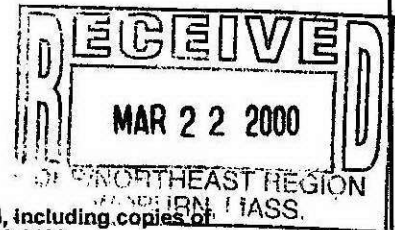
Site Name: Buckley and Mann, Inc.
Street: 17 Lawrence Street
Location Aid: Bush Pond
City/Town: Norfolk
ZIP Code: 02056-0000

Check here if a Tier Classification Submittal has been provided to DEP for this Release Tracking Number.

Related Release Tracking Numbers That This RAM or URAM Addresses:

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

- Submit a RAM Plan
Submit a RAM Status Report
Submit a RAM Completion Statement
Confirm or Provide URAM Notification
Submit a URAM Status Report
Submit a URAM Completion Statement



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. SITE CONDITIONS:

Check here if the source of the Release or Threat of Release is known.

- UST, Pipe/Hose/Line, AST, Drums, Transformer, Boat, Tanker Truck, Vehicle, Other: Bldg debris, coal ash, and textile plant waste

Identify Media and Receptors Affected: Air, Groundwater, Surface Water, Sediments, Soil, Wetlands, Storm Drain, Paved Surface, Private Well, Public Water Supply, Zone 2, Residence, School, Unknown, Other

Identify Release and/or Threat of Release Conditions at Site: (check all that apply)

- 2 and 72 Hour Reporting Condition(s), 120 Day Reporting Condition(s), Other Condition(s)

Describe Metals, PAH, and TPH from building debris, coal ash and textile plant

RAMs may be conducted concurrently with an IRA only with written DEP approval
URAMs may not be conducted if any 2 or 72 Hour conditions exist at the site.

Identify Oils and Hazardous Materials Released: Oils, Chlorinated Solvents, Heavy Metals, Others: PAH and TPH

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

- Assessment and/or Monitoring Only
Excavation of Contaminated Soils
Re-use, Recycling or Treatment
Store
Deployment of Absorbant or Containment Materials
Temporary Covers or Caps
Bioremediation
Soil Vapor Extraction
Structure Venting System
Product or NAPL Recovery

SECTION D IS CONTINUED ON THE NEXT PAGE.



RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking  
Number

3 - 173

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

D. DESCRIPTION OF RESPONSE ACTIONS (continued):

Landfill  Cover  Disposal Est. Vol.: 315 cubic yards

Removal of Drums, Tanks or Containers

Describe \_\_\_\_\_

Removal of Other Contaminated Media

Specify Type and Volume: \_\_\_\_\_

Other Response Actions Describe On-site consolidation and covering of 4,550 cy soil

See 310 CMR 40.0442 for limitations on the scope and type of RAMs.  
See 310 CMR 40.0464 for performance standards for URAMs.

Check here if this RAM or URAM involves the use of Innovative Technologies. DEP is interested in using this information to aid in creating an Innovative Technologies Clearinghouse.

Describe Technologies: \_\_\_\_\_

E. TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste has been sent to an off-site facility, answer the following questions)

Name of Facility: Chemical Waste Management- Turnkey Facility

Town and State: Rochester, NH

Quantity of Remediation Waste Transported to Date: 315 Tons (no change from previous semi-annual Status Rpt)

F. RAM PLAN:

Check here if this RAM Plan received previous oral approval from DEP as a continuation of a Limited Removal Action (LRA).

Date of Oral Approval: \_\_\_\_\_

If a RAM Compliance Fee is required, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. See 310 CMR 40.0444(2) to learn when a fee is not required.

Check here if the RAM Plan is proposed for a Transition Site. If this is the case, you may need to attach an LSP Evaluation Opinion prior to undertaking the RAM, if not previously provided. See 310 CMR 40.0600 for further information about Transition Sites.

G. RAM COMPLETION STATEMENT:

If a RAM Compliance Fee is required in connection with submission of the RAM Completion Statement, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. You owe this fee when submitting a RAM Completion Statement if you received oral approval of a RAM that continued an LRA, and have NOT previously submitted a RAM Plan and accompanying fee.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the RAM Completion Statement, you must submit a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the RAM Completion Statement.

H. URAM NOTIFICATION:

Identify Location Type: (check all that apply)  Public Right of Way  Utility Easement  Private Property

Identify Utility Type: (check all that apply)  Sanitary/Combined Sewerage  Water  Drainage  Natural Gas

Telephone  Steam Lines  Telecommunications  Electric  Other Specify \_\_\_\_\_

Check here if you provided DEP with previous oral notification of this URAM. Date of Oral Notice: \_\_\_\_\_

Check here if the property owner was NOT contacted prior to initiation of the URAM. If this is the case, you must attach an explanation of why the owner was not contacted, including the date and time when contact ultimately occurred.

Check here if this URAM will occur in connection with the construction of new public utilities. If this is the case, document the nature and extent of encountered contamination, the scope and expense of necessary mitigation and the benefits and limitations of project alternatives.

With the exception stated below, the person undertaking the URAM must provide the name and license number of an LSP engaged or employed in connection with the URAM:

LSP Name: \_\_\_\_\_ LSP License Number: \_\_\_\_\_

LSP information is not required if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by a Hazardous Material or a mixture of a Hazardous Material and Oil.





**RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Release Tracking  
Number

3 - 173

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

**I. URAM COMPLETION STATEMENT:**

Check here if this URAM was limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated by either a Hazardous Material or a mixture of a Hazardous Material and Oil.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the URAM Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the URAM Completion Statement.

**J. LSP OPINION:**

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

> if Section B of this form indicates that a **Release Abatement Measure Plan** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

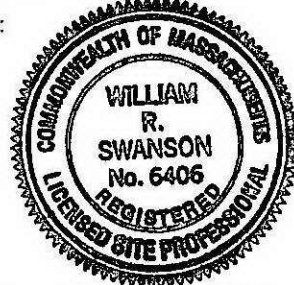
> if Section B of this form indicates that a **Release Abatement Measure Status Report** or a **Utility-Related Abatement Measure Status Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

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

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

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

LSP Name: William R. Swanson LSP #: 6406 Stamp:  
Telephone: 617-452-6274 Ext.: 8458  
FAX: 617-452-8274  
(optional)  
Signature: [Handwritten Signature]  
Date: 3/15/00



An LSP Opinion is not required for a Utility-Related Abatement Measure Notification.

An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by Hazardous Material or a mixture of Hazardous Material and Oil.

**K. PERSON UNDERTAKING RAM OR URAM:**

Name of Organization: Buckley and Mann Inc.  
Name of Contact: Richard Mann/ Stephen Mann Title: Owners  
Street: 15 Bush Pond Lane  
City/Town: Norfolk State: MA ZIP Code: 02056-0000  
Telephone: 781-828-0029 Ext.: 3442 FAX: (optional)

Check here if there has been a change in person undertaking the RAM or URAM.





RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking  
Number

3 - 173

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or URAM: (check one)

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

M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM:

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

By: Stephen [Signature] Title: TREASURER  
(signature)

For Buckley and Mann Inc. Date: 3/20/00  
(print name of person or entity recorded in Section K)

Enter address of person providing certification, if different from address recorded in Section K:

Street: N/A  
City/Town: \_\_\_\_\_ State \_\_\_\_\_ ZIP Code: \_\_\_\_\_  
Telephone: \_\_\_\_\_ Ext. \_\_\_\_\_ FAX: \_\_\_\_\_  
(optional)

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

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

1. Previous filing

The original RAM Plan was filed on May 28, 1996, and the revised RAM plan was filed in December 1997. The previous RAM Status report was filed in September 1999.

2. Work since the last report

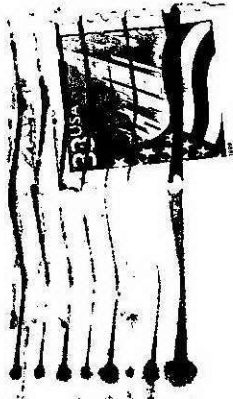
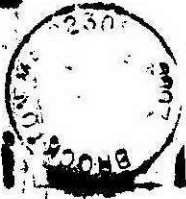
None. Sampling and analysis work at the former dyehouse wastewater treatment impoundments must wait until the groundwater table drops, in late summer 2000.

3. Work planned

The following tasks remain to complete the work in 2000:

- Obtain a Certificate of Compliance from the Norfolk Conservation Commission for work subject to the Order of Conditions for the consolidation area cover.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.
- Sample soils from the bottom of former dyehouse wastewater treatment impoundments for PAH compounds, and determine the closure requirements (if any) for the impoundments.

Buckley & Mann, Inc.  
14 Bush Pond Road  
Norfolk, MA 02056



Department of Environmental Protection  
Northeast Regional Office  
205 Lowell Street  
Wilmington, MA 01887

*N/A*

N/A

17 Lawrence St  
Norfolk

3-0173

Messrs. Richard & Stephen Mann  
Buckley & Mann, Inc.  
14 Bush Pond Road  
Norfolk, MA 02056

June 2, 1998

SCANNED

Department of Environmental Protection  
Northeast Regional Office  
205 Lowell Street  
Wilmington, MA 01887

Enclosed please find a semi-annual Status Report for the Release Abatement Measure at the Buckley & Mann property at 17 Lawrence Street, Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173. We apologize for the lateness of this report, but we were busy preparing to execute a contract for remediation work.

If you have any questions, please contact us at (781) 828-0029 X3442 or X3427.

*Stephen D. Mann,* TREASURER.

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC.  
CAMBRIDGE, MASSACHUSETTS

May 1998

Robert A. Dangel  
Licensed Site Professional # 7798

William R. Swanson  
Licensed Site Professional # 6406



RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS

BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

1. Previous filing

The RAM Plan was filed on May 28, 1996.

The previous RAM Status report was filed in September 1997.

2. Work since the last report

A revised RAM plan was filed with the DEP, reflecting a new approach of consolidating the contaminated soil on-site under an engineered cap and adopting an Activity and Use Limitation to restrict future use of the area.

Final drawings and specifications for the revised plan were prepared, bid and a contract for the work was executed. Construction began on May 4, 1998.

3. Work planned

Construction of the engineered cap should be completed by mid-June 1998.

Subsequently, B&M will prepare an AUL and file a RAM completion report.



RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 173

12  
15

A. SITE LOCATION:

Site Name: (optional) Buckley and Mann, Inc.

Street: 17 Lawrence Street Location Aid: Bush Pond

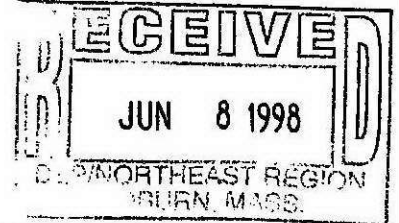
City/Town: Norfolk, Massachusetts ZIP Code: 02056-0000

Check here if a Tier Classification Submittal has been provided to DEP for this Release Tracking Number.

Related Release Tracking Numbers That This RAM or URAM Addresses: \_\_\_\_\_

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

- Submit a **RAM Plan** (complete Sections A, B, C, D, E, F, J, K, L and M).
  - Check here if this RAM Plan is an update or modification of a previously approved written RAM Plan. Date Submitted: \_\_\_\_\_
- Submit a **RAM Status Report** (complete Sections A, B, C, E, J, K, L and M).
- Submit a **RAM Completion Statement** (complete Sections A, B, C, D, E, G, J, K, L and M).
- Confirm or Provide **URAM Notification** (complete Sections A, B, H, K, L and M).
- Submit a **URAM Status Report** (complete Sections A, B, C, E, J, K, L and M).
- Submit a **URAM Completion Statement** (complete Sections A, B, C, D, E, I, J, K, L and M).



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. SITE CONDITIONS:

- Check here if the source of the Release or Threat of Release is known.
  - If yes, check all sources that apply:  UST  Pipe/Hose/Line  AST  Drums  Transformer  Boat
  - Tanker Truck  Vehicle  Other Specify: Bldg debris, coal ash and textile plant wastes
- Identify Media and Receptors Affected: (check all that apply)  Air  Groundwater  Surface Water  Sediments  Soil
  - Wetlands  Storm Drain  Paved Surface  Private Well  Public Water Supply  Zone 2  Residence
  - School  Unknown  Other Specify: \_\_\_\_\_
- Identify Release and/or Threat of Release Conditions at Site: (check all that apply)
  - 2 and 72 Hour Reporting Condition(s)  120 Day Reporting Condition(s)  Other Condition(s)
- Describe: Metals, PAH and TPH from building debris, coal ash and textile plant wastes

RAMs may be conducted concurrently with an IRA only with written DEP approval  
URAMs may not be conducted if any 2 or 72 Hour conditions exist at the site.

- Identify Oils and Hazardous Materials Released: (check all that apply)  Oils  Chlorinated Solvents  Heavy Metals
- Others Specify: PAH, TPH

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

- Assessment and/or Monitoring Only
- Excavation of Contaminated Soils
  - Re-use, Recycling or Treatment
    - On Site  Off Site Est. Vol.: \_\_\_\_\_ cubic yards
    - Describe: \_\_\_\_\_
  - Store  On Site  Off Site Est. Vol.: \_\_\_\_\_ cubic yards
- Deployment of Absorbant or Containment Materials
- Temporary Covers or Caps
- Bioremediation
- Soil Vapor Extraction
- Structure Venting System
- Product or NAPL Recovery

SECTION D IS CONTINUED ON THE NEXT PAGE.



RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 173

D. DESCRIPTION OF RESPONSE ACTIONS (continued):

- Landfill, Cover, Disposal Est. Vol., Groundwater Treatment Systems, Air Sparging, Temporary Water Supplies, Temporary Evacuation or Relocation of Residents, Fencing and Sign Posting, Removal of Drums, Tanks or Containers, Removal of Other Contaminated Media, Other Response Actions, Check here if this RAM or URAM involves the use of Innovative Technologies.

E. TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste has been sent to an off-site facility, answer the following questions)

Name of Facility:
Town and State:
Quantity of Remediation Waste Transported to Date:

F. RAM PLAN:

- Check here if this RAM Plan received previous oral approval from DEP as a continuation of a Limited Removal Action (LRA), If a RAM Compliance Fee is required, Check here if the RAM Plan is proposed for a Transition Site.

G. RAM COMPLETION STATEMENT:

- If a RAM Compliance Fee is required in connection with submission of the RAM Completion Statement, check here to certify that the fee has been submitted. If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the RAM Completion Statement, you must submit a Phase IV Remedy Implementation Plan...

H. URAM NOTIFICATION:

- Identify Location Type: Public Right of Way, Utility Easement, Private Property; Identify Utility Type: Sanitary/Combined Sewerage, Water, Drainage, Natural Gas, Telephone, Steam Lines, Telecommunications, Electric, Other; Check here if you provided DEP with previous oral notification of this URAM; Check here if the property owner was NOT contacted prior to initiation of the URAM; Check here if this URAM will occur in connection with the construction of new public utilities.



RELEASE & UTILITY-RELATED ABATEMENT MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 173

I. URAM COMPLETION STATEMENT:

Check here if this URAM was limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated by either a Hazardous Material or a mixture of a Hazardous Material and Oil.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the URAM Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the URAM Completion Statement.

J. LSP OPINION:

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

> if Section B of this form indicates that a Release Abatement Measure Plan is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that a Release Abatement Measure Status Report or a Utility-Related Abatement Measure Status Report is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

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

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

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

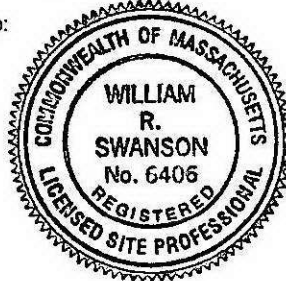
LSP Name: William R. Swanson LSP #: 6406 Stamp:

Telephone: 617-252-8000 Ext.: 8458

FAX: (optional) 617-621-2565

Signature: [Handwritten Signature]

Date: 5/26/98



An LSP Opinion is not required for a Utility-Related Abatement Measure Notification.

An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by Hazardous Material or a mixture of Hazardous Material and Oil.

K. PERSON UNDERTAKING RAM OR URAM:

Name of Organization: Buckley and Mann, Inc.

Name of Contact: Richard Mann/Stephen Mann Title: Owners

Street: 15 Bush Road Land

City/Town: Norfolk State: MA ZIP Code: 02056-0000

Telephone: 617-828-0029 Ext.: 3442 FAX: (optional)

Check here if there has been a change in person undertaking the RAM or URAM.



RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking Number

3 - 173

L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or URAM: (check one)

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

M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM:

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

By: Stephen T. Mann Title: TREASURER  
(signature)

For: Buckley and Mann, Inc. Date: 6/2/98  
(print name of person or entity recorded in Section K)

Enter address of person providing certification, if different from address recorded in Section K:

Street: N/A  
 City/Town: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: \_\_\_\_\_  
 Telephone: \_\_\_\_\_ Ext.: \_\_\_\_\_ FAX: (optional) \_\_\_\_\_

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



Messrs. Richard and Stephen Mann  
Buckley & Mann Inc.  
14 Bush Pond Road  
Norfolk, MA 02056

SCANNED

December 17, 1997

Department of Environmental Protection  
Northeast Regional Office  
10 Commerce Way  
Woburn, MA 01801

Subject: Buckley & Mann Inc., Bureau of Waste Site Cleanup #3-0173

Attention: Bureau of Waste Site Cleanup

Enclosed are copies of:

A cover letter to the Norfolk Conservation Commission, summarizing the proposed change to the April 1996 Release Abatement Measure (RAM) Plan,  
A revised RAM Plan with BWSC Transmittal Form 106,  
a Phase III Evaluation of Remedial Alternatives Report with BWSC Transmittal Form 108, Specifications and Drawings for the proposed work, and  
A Tier II Extension Report with Transmittal Form 107A.

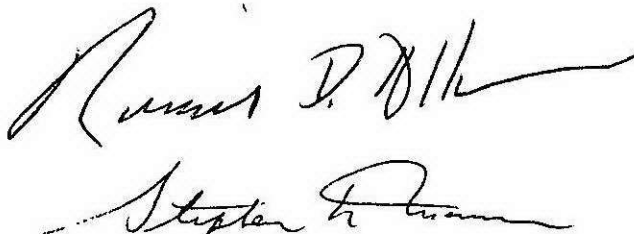
for the Buckley & Mann Inc. site in Norfolk, Massachusetts. As explained in these reports, B&M proposes to consolidate and cover most of the wastes on-site in Area#10, with off-site disposal of a relatively small quantity of unsuitable material.

Copies of this cover letter and the cover letter to the Conservation Commission have also been sent to the Norfolk Board of Selectmen and Board of Health. A complete package has been sent to the Norfolk Conservation Commission, requesting an opinion as to whether B&M would need to file a revised Notice of Intent under the Wetland regulations.

If you have any questions, please contact us at (781) 828-0029 X3442 or X3427

/s/

cc: See the distribution list with this letter



Richard D. Mann  
Stephen Mann

DISTRIBUTION LIST, BUCKLEY & MANN REVISED RELEASE ABATEMENT MEASURE PLAN, NOVEMBER 1997

Recipient	Mail method	Number of copies									
		Cover Letters *General *Conservation Commission	BWSC 106 Transmittal for RAM Plan	Revised RAM Plan	BWSC 108 Transmittal for Phase III	Phase III Report	Drawings and Specifications	BWSC 107A Transmittal for Tier Ext.	Tier II Extension Report		
Buckley & Mann	N/A	1	1	1	1	1	1	1	1	1	
Department of Environmental Protection Northeast Regional Office 10 Commerce Way Woburn, MA 01801	Certified, Return Receipt	1	1 (Original. See note.)	1	1 (Original. See note.)	1	1	1	1	1	
Town of Norfolk Board of Selectmen Town Hall 100 Main Street Norfolk, MA 02056	Regular	1	0	0	0	0	0	0	0	0	
Town of Norfolk Board of Health Town Hall 100 Main Street Norfolk, MA 02056	Regular	1	0	0	0	0	0	0	0	0	
Town of Norfolk Conservation Commission Town Hall 100 Main Street Norfolk, MA 02056	Regular	1	1	1	1	1	1	1	1	0	
Total photo copies (excluding original)		5 (draft enclosed)	2 (see note)	3	2 (see note)	3	3	3	2	2	

Note: Originals with CDM LSP signature are enclosed. Sign each and make copies for distribution, including 1 copy each for CDM.

December 5, 1997

Town of Norfolk  
Conservation Commission  
Town Hall  
100 Main Street  
Norfolk, MA 02056

Subject: Buckley & Mann property, Norfolk, MA  
Cons. Comm. File # 240-191, MCP Site # 3-0173

Dear Conservation Commission:

Camp Dresser & McKee Inc. is pleased to present the enclosed documents on behalf of Buckley & Mann, Inc. (B&M), Norfolk, Massachusetts.

B&M obtained an Order of Conditions from the Commission in August 1995 for work related to assessment and remediation of contaminated soils at its Lawrence Street property. In April 1996, B&M submitted a Massachusetts Contingency Plan (MCP) Release Abatement Measure (RAM) Plan related to excavation and disposal of contaminated soils from certain portions of the site. The Department of Environmental Protection (DEP) did not comment on the Plan, which thereby received presumptive approval. A construction bid package for the proposed work was prepared in October 1996 but not issued, pending resolution of matters internal to B&M.

The enclosed MCP Phase III Evaluation of Remedial Alternatives and amended RAM Plan describe a modest change in the proposed approach to complete a "Permanent Solution" under the MCP. The primary change from the April 1996 Plan is to reduce the volume of material to be shipped off-site. Under the revised approach, material with relatively low contaminant concentrations which was to be shipped to a landfill for reuse as daily cover would instead be retained at B&M. The material would be consolidated in the area where the bulk of the coal ash and Carbonizer Spoils have rested for the last 40 to 100 years. The consolidation area would be covered with a geotextile and a two foot thick cover of clean sand from an on-site source, followed by loaming and seeding. This approach is consistent with the current trend in site remediation toward solutions which incorporate on-site measures rather than off-site disposal of contaminated where:

- the contaminated soils can be consolidated and covered,
- the contaminants are not likely to migrate, and
- future exposure pathways to the contaminated soil can be controlled by adoption of an Activity and Use Limitation (AUL).

The revised approach is suited to B&M because the material to remain on-site:

- has contaminant concentrations only slightly above the applicable MCP Method 1 Risk limits and far below Upper Concentration Limits (a Permanent Solution is often not possible if concentrations exceed the Upper Concentration Limits), and

Norfolk Conservation Commission  
December 5, 1997  
Page 2

- does not pose a significant risk of leaching contaminants into groundwater, based on past monitoring results (a confirmatory groundwater sampling and analysis round is planned).

The revised approach also addresses B&M's concern over the ultimate volume and associated cost for off-site reuse/disposal of the debris, coal ash and Carbonizer spoils. While the horizontal extent of these materials is reasonably well known, depth data are incomplete because some of the test pits excavated in late 1995 did not reach the bottom of fill material. Excavation was stopped either because the fill material appeared uniform with depth or because the excavation reached the groundwater table. Hence, the April 1996 RAM Plan estimate of the volume of material to be removed may have been low. If the volume significantly exceeded estimates, or if the material was not accessible due to high groundwater, a cover similar to the one proposed in the revised RAM Plan might be needed in lieu of full excavation and removal. The revised RAM Plan avoids this problem assuming that contaminated soils will remain on-site, and prepares for that condition with a cover design.

The revised approach retains the original intent to monitor the course of excavation and separate materials unsuitable for retention on site. Such materials, judged to be dissimilar to the "urban fill" appearance of the material found in most of the test pits and suspected of having high concentrations of contaminants, would be shipped to a suitable disposal facility after the appropriate characterization.

The lateral extent of the work area for the revised approach is essentially the same as in the April 1996 RAM Plan. The work would be in the buffer zone near the Tail Race. The changes in the new Plan would result in:

- clearing a slightly larger area and
- establishing a higher finished grade in the former Carbonizer Spoils area, as shown on the enclosed drawing.

These changes would not have an adverse impact on the Tail Race or the wetland to the north of the work area.

Currently, dense vegetation limits access to parts of the proposed work area. Consequently, trees and brush would have to be cleared before installation of the hay bale siltation barrier on the northern perimeter of the work area. The siltation barrier would be installed before excavation begins.

Pursuant to Section 10 of the Special Conditions in the Order of Conditions, this letter and the enclosed reports document proposed changes to the RAM Plan. B&M hereby requests an opinion from the Conservation Commission as to whether the changes require filing of a new

Norfolk Conservation Commission  
December 5, 1997  
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Notice of Intent. Please respond to:

Stephen Mann, Buckley & Mann Inc., 14 Bush Pond Lane, Norfolk, MA 02056  
and  
Robert Dangel, Camp Dresser & McKee Inc., 10 Cambridge Center, Cambridge, MA 02142

If you have any questions, please contact Stephen Mann (508) 528-4296 or Robert Dangel at (617) 252-8831.

Very truly yours,

CAMP DRESSER & McKEE INC.



Robert A. Dangel, LSP  
Principal Scientist

Approved:



William R. Swanson, PE, LSP  
Vice President





Executive Office of Environmental Affairs  
**Department of  
Environmental Protection**  
Metro Boston/Northeast Regional Office

William F. Weld  
Governor  
Daniel S. Greenbaum  
Commissioner

BUREAU OF WASTE SITE CLEANUP  
SITE MANAGEMENT BRANCH

TELEPHONE CONVERSATION NOTES

SITE NAME: Buckley + Mann, Inc.

SITE NUMBER: 3-0173

SITE LOCATION: 17 Lawrence St.

DATE: 6/23/98 TIME: \_\_\_\_\_

FROM: Joanne Fagan REPRESENTING: DEP

TO: William Swanson, LSP REPRESENTING: CDM 617-252-8458

DISCUSSION: The writer called Mr. Swanson to comment on the RAM Status Report dated June 2, '98:

- 1) The report refers to the proposed cap as an "engineered cap". I pointed out that an "engineered barrier", as defined in the MCP, must meet RCRA capping requirements at a minimum. Mr. Swanson replied that his proposal was not meant as an "engineered barrier".
- 2) If the future use of the site is residential or recreational, the cap must have a geomembrane covered with 3 ft. of soil, at a minimum, not 2 ft. of soil. Mr. Swanson replied that he had recently discussed this issue with his client & they have agreed to add another foot of soil to meet this requirement.
- 3) All cannot be submitted prior to PAO. (Report states All will be submitted with the RAM Completion Statement).



SCANNED Release Tracking

**TIER CLASSIFICATION, TIER II EXTENSION &  
TIER II TRANSFER TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

3 - 173

**A. DISPOSAL SITE LOCATION:**

Disposal Site Buckley & Mann, Inc.  
Street: 17 Lawrence Street Location Aid: Bush Pond  
City/Town: Norfolk, MA ZIP 02056-0000  
Related Release Tracking Numbers That This Submittal Will \_\_\_\_\_

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

- Submit a new or revised Tier Classification Submittal for a Tier I Site, including a Numerical Ranking Scoresheet (complete Sections A, B, C, I, J, K and L).
- Submit a new or revised Tier Classification Submittal for a Tier II Site, including a Numerical Ranking Scoresheet (complete Sections A, B, C, F, G, I, J, K and L).
- Submit a Notice that an additional Release Tracking Number(s) is (are) being linked to this Tier Classified Site and rescoring is not required at this time (complete Sections A, B, J, K and L). If this submittal is for a Tier I Site, you must also submit a Minor Permit Modification Transmittal Form (BWSC-109).  
List Additional Release Tracking \_\_\_\_\_
- Submit a Phase I Completion Statement supporting a Tier Classification Submittal (complete Sections A, B, I, J, K and L).
- Submit a Tier II Extension Submittal for Response Actions at a Tier II Site (complete Sections A, B, D, F, G, I, J, K and L).
- Submit a Tier II Extension Submittal for Response Actions taken after expiration of a Waiver, pursuant to 310 CMR 40.0630(4) (complete Sections A, B, D, F, J, K and L, and also complete Sections G and I or Section H).\*
- Submit a Tier II Transfer Submittal for a change in person(s) undertaking Response Actions at a Tier II Site (complete Sections A, B, E, F, G, I, J, K, L, M, N and O).
- Submit a Tier II Transfer Submittal for a change in person(s) undertaking Response Actions at a Waiver Site, pursuant to 310 CMR 40.0630(6) (complete Sections A, B, E, F, J, K, L, M, N and O, and also complete Sections G and I or Section H).\*

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.

\*NOTE: The Waiver expires on the effective date of this submittal and all further Response Actions must be taken as a Tier II Site.

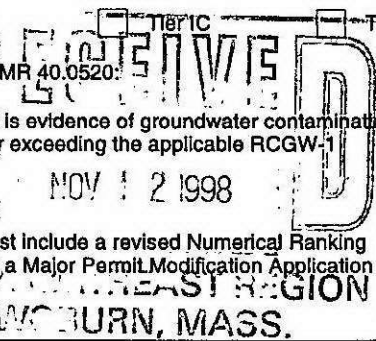
**C. TIER CLASSIFICATION SUBMITTAL:**

Numerical Ranking Score for Disposal Site: (from Numerical Ranking \_\_\_\_\_)

Proposed Tier Classification of Disposal Site: (check one)  Tier IA  Tier IB  Tier IC  Tier II

Check which, if any, of the Tier I inclusionary criteria are met by the Disposal Site, pursuant to 310 CMR 40.0520:

- Groundwater is located within an Interim Wellhead Protection Area or a Zone II, and there is evidence of groundwater contamination by an Oil or Hazardous Material at the time of Tier Classification at concentrations equal to or exceeding the applicable RCGW-1 Reportable Concentration set forth in 310 CMR 40.0360.
  - An Imminent Hazard is present at the time of Tier Classification.
  - Check here if this Tier Classification revises a previous submittal for this Disposal Site. You must include a revised Numerical Ranking Scoresheet with this submittal. If a Tier I Permit has been issued, you may also need to submit a Major Permit Modification Application (BWSC 10).
- If incorporating additional Release(s) into the Disposal Site, list Release Tracking \_\_\_\_\_



**D. TIER II EXTENSION SUBMITTAL**

State the expiration date of the Tier II Classification or Waiver for the Disposal Site, whichever is 02/22/99

Attach a statement summarizing why a Permanent or Temporary Solution has not been achieved at the Disposal Site. A Tier II Extension is effective for a period of one year beyond the current expiration date of the Tier II Classification or Waiver.

**E. TIER II TRANSFER SUBMITTAL REQUIREMENTS:**

State the proposed effective date of the change in person(s) undertaking Response Actions at the Disposal \_\_\_\_\_

Attach a statement summarizing the reasons for the proposed change in person(s) undertaking the Response Actions. All Response Actions must be completed by the deadline applicable to the person who first filed either a Tier Classification Submittal for the Disposal Site or received a Waiver of Approvals.



**TIER CLASSIFICATION, TIER II EXTENSION &  
TIER II TRANSFER TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking

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**F. DISPOSAL SITE COMPLIANCE HISTORY SUMMARY:**

- > If providing either a Tier Classification Submittal for a Tier II Site or a Tier II Extension Submittal for a Waiver Site, the person named in Section J must provide a Compliance History.
- > If providing a Tier II Extension Submittal for a Tier II Site, the person named in Section J must update their Compliance History since the effective date of the Tier II Classification.
- > If providing a Tier II Transfer Submittal for a Tier II or Waiver Site, the person named in Section M must provide a Compliance History.

Compliance History for (provide only one name per Buckley & Mann, Inc.)

Check here if there has been no change to the Compliance History of the person named above (Extension Submittal for a Tier II Site ONLY).

List all permits or licenses that have been issued by the Department that are relevant to this Disposal Site:

PROGRAM:	PERMIT NUMBER:	PERMIT CATEGORY:	FACILITY ID:
Air Quality	0		
Hazardous Waste (M.G.L. c. 21C)	0		
Solid Waste	0		
Industrial Wastewater Management	0		
Water Supply	0		
Water Pollution Control/Surface Water	0		
Water Pollution Control/Groundwater	0		
Water Pollution Control/Sewer Connection	0		
Wetland & Waterways	0		

List all other Federal, state or local permits, licenses, certifications, registrations, variances, or approvals that are relevant to this Disposal Site:

ISSUING AUTHORITY OR PROGRAM, OR DOCUMENTATION TYPE:	IDENTIFICATION NUMBER:	DATE ISSUED:
Inactive site		

If needed, attach to this Transmittal Form a statement further describing the Compliance History of this Disposal Site. This statement must describe the compliance history of the person named above with the following:

- (1) DEP regulations; and
- (2) other laws for the protection of health, safety, public welfare and the environment administered or enforced by any other government agency.

Such a statement should identify information such as:

- (1) actions relevant to the Disposal Site taken by the Department to enforce its requirements including, but not limited to, a Notice of Noncompliance (NON), Notice of Intent to Assess Civil Administrative Penalty (PAN), Notice of intent to Take Response Action (NORA), and an administrative enforcement order;
- (2) administrative consent orders;
- (3) judicial consent judgements;
- (4) similar administrative actions taken by other Federal, state or local agencies;
- (5) civil or criminal actions relevant to the Disposal Site brought on behalf of the DEP or other Federal, state, or local agencies; and
- (6) any additional relevant information.

- (1) name of the issuing authority, type of action, identification number and date issued;
- (2) description of noncompliance cited;
- (3) current status of the matter; and
- (4) final disposition, if any.



TIER CLASSIFICATION, TIER II EXTENSION &
TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking

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G. CERTIFICATION OF ABILITY AND WILLINGNESS:

> If providing either a Tier II Classification Submittal or a Tier II Extension Submittal, the person who signs this certification MUST be the person named in Section J, or that person's agent.

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 Transmittal Form 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 learn(s) that it/they is/are unable to proceed with the necessary response actions.

By: [Signature] Title: President
For: Buckley & Mann, Inc. Date: 11/5/98

If you are submitting either a Tier II Extension Submittal for a Waiver Site or a Tier II Transfer Submittal for a Waiver Site, you may choose to sign the alternative Ability and Willingness Certification found in Section H in place of providing the certification in Section G and the LSP Opinion in Section I.

H. ALTERNATIVE CERTIFICATION OF ABILITY AND WILLINGNESS:

> If providing a Tier II Extension Submittal for a Waiver Site, the person who signs this certification MUST be the person named in Section J, or that person's agent
> If providing a Tier II Transfer Submittal for a Waiver Site, the person who signs this certification MUST be the person named in Section M, or

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 Consultant-of-Record for the disposal site which is the subject of this Transmittal Form 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 learn(s) that it/they is/are unable to proceed with the necessary response actions.

By: \_\_\_\_\_ Title: \_\_\_\_\_
For: \_\_\_\_\_ Date: \_\_\_\_\_

I. LSP OPINION:

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

> if Section B of this form indicates that a Tier I or Tier II Classification Submittal which relies upon a previously submitted Phase I Completion Statement is being submitted, this Tier Classification Submittal has been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that a Phase I Completion Statement or a Tier I or Tier II Classification Submittal which does not rely upon a previously submitted Phase I Completion Statement is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

SECTION I IS CONTINUED ON THE NEXT PAGE





**TIER CLASSIFICATION, TIER II EXTENSION &  
TIER II TRANSFER TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking

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**I. LSP OPINION: (continued)**

> If Section B of this form indicates that a Tier II Extension Submittal or a Tier II Transfer Submittal is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

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

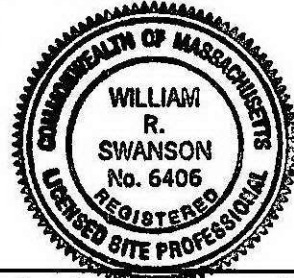
LSP Name: William R. Swanson LSP #: 6406 Stamp:

Telephone: 617-252-8000 Ext.: 8458

FAX: 617-621-2565

Signature: *William R. Swanson*

Date: 11/2/98



**J. PERSON MAKING SUBMITTAL: (For Transfer Submittals describe person currently undertaking response actions, not transferee)**

Name of Buckley & Mann, Inc.

Name of Richard Mann/Stephen Mann Title: Owners

Street: 14 Bush Pond Lane

City/Town: Norfolk State: MA ZIP Code: 02056-0000

Telephone: 781-828-0029 Ext.: 3442 FAX: \_\_\_\_\_

**K. RELATIONSHIP TO DISPOSAL SITE OF PERSON MAKING SUBMITTAL: (check one)**

RP or PRP Specify  Owner  Operator  Generator  Transporter Other RP or PRP: \_\_\_\_\_

Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

Any Other Person Making Submittal Specify \_\_\_\_\_

**L. CERTIFICATION OF PERSON MAKING SUBMITTAL:**

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

By: *Richard Mann* Title: President  
(signature)

For: Buckley & Mann, Inc. Date: 11/5/98  
(print name of person or entity recorded in Section J)

Enter address of the person providing certification(s), including Ability and Willingness Certification where applicable, if different from address recorded in Section J:

Street: \_\_\_\_\_

City/Town: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: \_\_\_\_\_

Telephone: \_\_\_\_\_ Ext.: \_\_\_\_\_ FAX: \_\_\_\_\_

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

MCP TIER II EXTENSION REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC.  
CAMBRIDGE, MASSACHUSETTS

November 2, 1998

Robert A. Dangel  
Licensed Site Professional # 7798

William R. Swanson  
Licensed Site Professional # 6406



MCP TIER II EXTENSION REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

The first year of the Tier II extension for this site expires on February 22, 1999.

This report describes the progress made over the last 12 months and plans to complete remediation at the site.

The following work was completed during the 1988 Tier II extension period:

- Groundwater sampling and analyses
- Preparation of final drawings and specifications for the remediation work
- Solicitation of bids and award of a contract for the remediation work
- Substantial completion of the remediation work, in accordance with the Release Abatement Measures Plan

Appendix A to this Tier II Extension report contains a detailed description of the work completed.

The following tasks remain to complete the work in 1999:

- Remove approximately 50 cubic yards contaminated soil from Area 5 and place the material under the cover in the Area 10 consolidation area. This material was overlooked in the May and June remediation work.
- Add approximately 2,000 cubic yards additional sand and a loam layer to complete the three foot consolidation area cover, followed by hydroseeding.
- Obtain a Certificate of Compliance from the Norfolk Conservation Commission.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.

APPENDIX A

RELEASE ABATEMENT MEASURE  
NOVEMBER 1998 STATUS REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC.  
CAMBRIDGE, MASSACHUSETTS

November 2, 1998

Robert A. Dangel  
Licensed Site Professional # 7798

William R. Swanson  
Licensed Site Professional # 6406

RELEASE ABATEMENT MEASURE  
NOVEMBER 1998 STATUS REPORT  
BUCKLEY & MANN INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEANUP SITE NUMBER 3-0173

## 1.0 INTRODUCTION

This status report documents the progress toward completion of the Release Abatement Measure (RAM) at the Buckley & Mann Inc. (B&M) site in Norfolk, Massachusetts. The Revised RAM Plan for B&M was submitted to Department of Environmental Protection (DEP) in November 1997.

## 2.0 PREVIOUS REPORTS

The RAM Plan addressed the two acres (referred to as Area 10) on which the Carbonizer spoils, coal ash and building demolition debris were disposed, three small areas (Areas 3, 5 and 6) of contaminated soil associated with the former dyehouse wastewater treatment Lagoons 1 and 2, and 11 drums of sand scraped from Lagoon 1 (Area 4) and from a small pit with dye past (Area 7).

A complete description of the manufacturing operations, characterization data, site conditions, and surrounding receptors is included in the *Site Assessment and Remediation Status Report and Release Abatement Measures Plan Support Document*, submitted to DEP in April 1996. Site assessment data showed that soil contaminant concentrations are only slightly above the applicable MCP S-2 No Significant Risk Criteria. The contaminants of concern are chromium, lead, and polyaromatic hydrocarbons (PAHs).

## 3.0 DESCRIPTION OF RELEASE ABATEMENT MEASURE

### 3.1 Summary

The RAM for this site consisted of the following major components:

- groundwater monitoring
- site clearing;
- excavation and onsite consolidation (in Area 10) of contaminated soils, Carbonizer spoils, coal ash, building demolition debris, and wastewater lagoon residues;
- off-site disposal of unsuitable material; and
- installation of a cover system.

The work followed the RAM Plan, except that the design thickness for the clean sand cover was increased to three feet, as suggested by the DEP, instead of the two feet originally planned. Also,

a small volume of material tentatively selected for off-site disposal, rather than on-site consolidation, was retained on-site, as described in Section 3.7 of this report.

B&M contracted with Fleet Environmental Services, Inc. to perform the work. Fleet subcontracted the excavating, hauling, and grading operations to G. Lopes Construction Inc. Camp Dresser & McKee Inc. (CDM) provided resident engineering. The site work began May 11, 1998 and was substantially complete on June 24, 1998.

An Activity and Use Limitation (AUL) will be established to restrict future use of the consolidation area. This approach to site closure was determined to reach a condition of No Significant Risk, as described in the *Evaluation of Remedial Action Alternatives (Phase III)*, which was submitted to DEP in November 1997.

### 3.2 Groundwater Sampling and Analyses

CDM sampled monitoring wells 1, 2, 3, 3A, 4, 5, 6 and EW-2 in May 1998. Well EW-1 was filled with silt and could not be sampled.

Table 1 summarizes the groundwater analytical data. The data were originally reported on May 26, 1998, but at CDM's request, the laboratory later issued a revised report with lower "non-detect" concentrations for Polyaromatic Hydrocarbons (PAH). The lower non-detect concentrations were obtained on further review of the original electronic data files from the analytical instruments. The lower non-detect limits are in the range of the MCP standards for the most restricted PAHs. Copies of the complete laboratory reports will be included as an Appendix to the RAM completion statement.

Table 1 shows that the PAH and metals concentrations were all below the applicable MCP GW-1 and GW-3 standards.

Wells 3, 4 and 6 had Chemical Oxygen Demand (COD) concentrations of 190, 190, and 340 mg/L. These samples were subsequently tested for Total Organic Carbon (TOC), to determine whether the COD was attributable to iron or organic compounds. The TOC concentrations, at 14, 17 and 24 mg/L, showed that approximately 20 percent of the COD was attributable to organic compounds, with the remainder likely attributable to iron. Considering that the areas around these shallow wells are wetlands, the organic component is likely decayed plant material.

Groundwater elevation measurements confirmed that the static head in bedrock well 3A was higher than the adjacent shallow well in the unconsolidated soil. This shows that groundwater from the surrounding hills discharges to the Mill River and the Tail Race, and that the area around the lagoons is not a recharge zone. The field data also showed high iron concentrations (based on rust discoloration in many samples) and high turbidity from silt.

Monitoring wells 1 and 4, located within the consolidation area, were destroyed during

TABLE I  
BUCKLEY MANN INC.  
GROUNDWATER ANALYSES  
Samples collected on 7 May 1998

Well #	CDM Lab # 98-040XX	pH	Conductivity ms/cm	DO mg/L	Turbidity NTU	PAH ug/L (See note)	Chromium ug/L	Lead ug/L	Zinc ug/L	TOC mg/L	COD mg/L	Groundwater elev., Ft
EW-2	56	6.4	0.113	8.4	496	<	< 0.85	< 0.68	30		<	162.23
1	57	6.0	0.085	1.7	520		1.4	< 0.68	49	9.7	35	166.27
2 (Upgradient)	58	6.3	0.086	9.1	999		< 0.85	< 0.68	<		15	164.90
2 (Duplicate)	62						2.2	1.4	<		12	
3	55	6.2	0.113	6.7	999	<	32	< 0.68	220	14	190	159.31
3A (Bed Rock)	54	6.5	0.133	7.4	386	<	< 0.85	< 0.68	<		<	161.16
4	59	6.4	0.039	8.4	570		2.4	< 0.68	12	17	190	162.03
5	60	6.6	0.220	7.7	999		< 0.85	< 0.68	12		<	160.87
6	61	6.5	0.223	1.5	999		5.3	3.7	13	24	340	163.89

MCP GW-1	See note	100	15	2,000
MCP GW-3	See note	2,000	30	900

Notes:

The reporting limits for PAH compounds in CDM's May 26, 1998 laboratory report were too high to allow direct comparison to MCP Method 1 standards. In preparing this report, the laboratory reexamined the original GC/MS data set and set new reporting limits. These new limits are contained in the October 1, 1998 version of the report, for both PAH compounds and metals.

The reporting limits for PAH compounds in groundwater samples ranged from 0.3 to 0.69 ug/L.

The MCP limits for PAH compounds in GW-1 groundwater range from 0.2 ug/L to 3,000 ug/L. GW-3 limits are typically 1 to 3 orders of magnitude higher. The GW-1 limit for naphthalene and 2-methyl naphthalene, the PAH compounds found in B&M Lagoon #1 soils, are 20 and 10 ug/L, respectively.

The field record and consequently, the laboratory reports, inadvertently switched the identification of wells 3 and 3A. This summary table corrects the error.



excavation and moving operations.

### 3.3 Site Clearing

Existing vegetation was cleared from within the approximate limits of Areas 3, 5, 6, 10, and the sand borrow area. Tree trunks, limbs, and brush less than approximately 8 inches in diameter were chipped on site, and stored in a pile outside of the work area. Trunks greater than 8 inches in diameter were shipped off site for commercial sale by Dan Reed Logging Co. All tree stumps were removed from the work areas and were shipped off site for chipping/recycling by New England Recycling, a subsidiary of G. Lopes Construction.

As described in the RAM Plan, the perimeter could not be accessed through the thick vegetation prior to clearing. The siltation barrier was installed around the southern, western, and northern limits of Area 10 (consolidation area) immediately after clearing.

### 3.4 Material Consolidation

The material encountered in Area 10 during remediation was the same as anticipated based on the 1995 test pit excavation and characterization program. The material consisted of soil, building demolition debris (brick, concrete, wood, piping, asphalt shingles, etc.), coal ash, textile debris, and abandoned equipment. The material was judged, based on visual inspection, suitable to remain on site within the consolidation area, except as discussed in Section 3.5.

The majority of material had been placed in piles on the north side of a former cart road that ran the length of Area 10, and extended to an area northeast of the elevated concrete pad, as shown on Drawing C-3. Debris was also scattered to the south of the cart road in Area 10. Material deposited in Areas 3, 5, and 6 consisted of soil excavated from Lagoon 1 and from the former dyehouse trench to Lagoon 1.

The material in Area 10 was moved with a tracked excavator, front end loader, and a bulldozer in a manner that allowed visual inspection of the debris and separation of material that was deemed unsuitable for onsite consolidation. The work was sequenced so that all material piled above the base grades of Area 10 was moved and inspected at least once. Where unsuitable material, such as timbers and equipment, extended below the base grade, the excavation was continued to remove that material from Area 10. After each section of Area 10 was excavated to the base grade, CDM surveyed surface elevations to estimate the volume of material moved.

The process of moving, visually inspecting and regrading was completed for all of Area 10 in sections. Once the subgrade of a section had been surveyed and inspected, material judged to be suitable to remain on site was pushed back and graded within the limits of the final consolidation area. Material north and east of the concrete pad located in Area 10, but outside the consolidation area, was pushed, inspected, and graded within the limits of the consolidation area. All the material excavated from Areas 3, 5, and 6 (predominantly soil mixed with textile fiber)

was judged suitable to remain on site, and was also placed in the consolidation area in Area 10. The consolidated material was then graded to a thickness of approximately three feet. CDM surveyed surface elevations and calculated that approximately 4,550 cubic yards of material was placed within the limits of the consolidation area.

All textile processing equipment debris, large timbers, and concrete blocks were segregated and stockpiled out of the work area. This material will be disposed of coincident with demolition of the buildings, at a later date.

### 3.5 Off-site Disposal

#### 3.5.1 Test Pit 10 Material

Material in the vicinity of Test Pit 10 (1995 site investigation numbering) in Area 10 was designated for off-site disposal because the material contained chromium and lead at 1,900 mg/kg and 5,000 mg/kg, respectively. This material was visually distinct from surrounding material due to its reddish color. The soil had been stained red from oxidized metal shavings. On June 12, 1998, this material was excavated, stockpiled on a polyethylene liner outside the work area, and covered with polyethylene. On June 23, 1998, this material was transported to the Waste Management Turnkey Facility, Rochester, New Hampshire, for disposal. Nine trailers, with a total of 314.75 tons of material, were shipped under an MCP Bill of Lading (BOL). The original copy of the BOL was submitted to DEP on July 24, 1998.

#### 3.5.2 Drums

Two drums, each partially filled with granular solid material, were uncovered and removed from Area 10 during the May and June 1998 remediation work.

B&M tentatively identified the white granular material from one drum as either sodium carbonate or sodium borate. CDM analyzed the material for boron by the Inductively Coupled Argon Plasma method, and found none. A dilute solution of the material was pH 9.3. Acidification to pH 5 initiated gas evolution, with strong gas evolution at pH 2. The pH and gas evolution suggest that the granular material is sodium bicarbonate, with a small portion of sodium carbonate.

B&M tentatively identified the glassy-flake material from the other drum as a polymeric adhesive, formerly applied to the back side of fabric products, or a solid plasticizer designed to be mixed with the adhesive. The material is not readily water soluble.

The contents of these drums will be disposed of by B&M.

#### 3.5.3 Transite

On May 12, 1998, after a portion of the site was cleared, a small pile of corrugated transite panel scraps was discovered within the western end of Area 10. These 12 to 18 inch long pieces were likely trimmings from transite siding installed on B&M manufacturing buildings. The panels were suspected to contain asbestos. CDM made verbal notification to DEP on May 13, 1998. Additional transite panels were discovered on the concrete pad at the east end of Area 10 on May 15, 1998. Fleet filed an asbestos removal notification form with DEP on May 15, 1998.

Fleet removed the transite panels on June 2, 1998, after the 10 day waiting period (to allow the DEP opportunity to review the case) had passed. A total of 4 cubic yards of transite was transported to Elizabeth, PA for disposal at the Kelly Run Landfill, operated by United Waste Systems.

### 3.6 Cover Installation

After the consolidated material in Area 10 was graded, a geotextile fabric was placed over the material to separate it from the clean sand cover. Approximately 8,000 square yards of 70-mil #4551 non-woven geotextile fabric, manufactured by Amoco Fabrics and Fibers Co. and supplied by A.H. Harris & Sons, Inc., were installed.

The RAM Plan and construction specifications required a two foot, clean sand cover over the geotextile fabric. After the work was bid, CDM was advised by the DEP to provide three feet of clean fill over contaminated soils. This approach was consistent with DEP advice on similar sites. Consequently, a field change was made to increase the thickness of the clean sand layer to three feet. CDM estimates that approximately 6,000 cubic yards of clean sand from the on-site source was placed over the consolidated material in Area 10. The sand was graded to shed stormwater, with a crown running east-west. The 6,000 cubic yards includes the sand placed in a one foot layer over the area northeast of the concrete pad (outside the limits of the consolidation area), after debris from that area was moved to the consolidation area.

CDM surveyed the base, fill surface and cover surface elevations in Area 10 during remediation, and then calculated soil volumes with computer software. The computer analysis suggested that portions of the cover did not meet the three foot thickness requirement, despite placement of 6,000 cubic yards of sand. In September 1998, CDM excavated 22 test holes and confirmed that the cover was thin in some areas, as shown on Drawing C-3. Approximately 2,000 cubic yard of sand is needed to complete the three foot cover, prior to application of topsoil and seed. Completion of the cover is scheduled for early Spring 1999.

### 3.7 Soil Sampling and Analyses

CDM collected soil samples from the undisturbed subgrades in areas from which the contaminated material was removed. One sample was collected from each of Areas 3, 5, and 6, and two samples were collected from the area north and east of the concrete pad in Area 10. These areas are outside the limits of the consolidation area. The five samples were analyzed for

TABLE 2  
BUCKLEY MANN INC  
ANALYSIS OF SOIL SAMPLES FROM AREA REMEDIATED IN JUNE 1998  
Samples from Areas 3, 5, 6 and 10 (outside of the 3-foot cover)

PAH Compounds	MCP Method 1 Standards		MCP Method 1 Standards		Area 3 A3-01	Area 5 A5-01	Area 6 A6-01	Area 10 A10-01	Area 10 A10-02	Area 10 Average
	S-1/GW-1	S-1/GW-3	S-2/GW-1	S-2/GW-3						
	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Acenaphthene	20	1,000	20	2,500	ND = < 0.22	ND = < 0.19	ND = < 0.19	ND = < 0.22	ND = < 0.19	ND
Acenaphthylene	100	1,000	100	1,000	ND	ND	ND	ND	ND	ND
Anthracene	1,000	1,000	2,500	2,500	ND	ND	ND	0.26	0.33	0.30
Benzo(a)anthracene	0.7	0.7	1	1	ND	ND	ND	0.47	0.76	0.62
Benzo(b)fluoranthene	0.7	0.7	1	1	ND	ND	ND	0.25	0.42	0.34
Benzo(k)fluoranthene	7	7	10	10	ND	ND	ND	0.41	0.54	0.48
Benzo(g,h,i)perylene	1,000	1,000	2,500	2,500	ND	ND	ND	0.22	0.26	0.24
Benzo(a)pyrene	0.7	0.7	0.7	0.7	ND	ND	ND	0.44	0.65	0.55
Chrysene	7	7	10	10	ND	ND	ND	0.50	0.73	0.62
Dibenzo(a,h)anthracene	0.7	0.7	0.7	0.7	ND	ND	ND	ND	ND	ND
Fluoranthene	1,000	1,000	2,000	1,000	ND	ND	0.23	1.0	1.4	1.2
Fluorene	400	1,000	400	2,000	ND	ND	ND	ND	ND	ND
Indeno(1,2,3-cd)pyrene	0.7	0.7	1	1	ND	ND	ND	ND	0.26	ND
2-Methylnaphthalene	4	500	4	1,000	ND	ND	ND	ND	0.26	ND
Naphthalene	4	100	4	1,000	ND	ND	ND	ND	ND	ND
Phenanthrene	700	100	700	100	ND	ND	ND	ND	ND	ND
Pyrene	700	700	1,000	2,000	ND	ND	0.20	0.78	0.86	0.82
								0.84	1.0	0.9
<b>Metals</b>										
Chromium	1,000	1,000	2,500	2,500	260	650	460	29	350	190
Lead	300	300	600	600	9.9	24	19	150	32	91
Zinc	2,500	2,500	2,500	2,500	64	120	57	180	83	132

**Note:**

Samples were collected from the underlying soil after removal of contaminated soil.

With the exception of benzo (a) anthracene in a single sample from Area 10, all parameters for all samples were below the MCP S-1 standards. The benzo (a) anthracene in the Area 10 sample was only slightly above the standard, and the average of the two samples was below the standard.

lead, chromium, zinc, and PAHs. The results, summarized in Table 2, show that concentrations were all less than the MCP S-1 standards.

### 3.8 Variances from the RAM Plan

The RAM Plan included a provision for off-site disposal of material contained in 14 55-gallon drums filled with soils from Areas 4 and 7. The soils were thought to contain some dye paste and the RAM Plan called for disposal of the soil as non-hazardous waste and any dye paste as hazardous waste.

The drums were individually emptied onto a plastic sheet for inspection. The material in the drums consisted of soil and decomposed leaves, similar to the material from Area 5, with no dye paste. Consequently, the 2 to 3 cubic yards of material from the drums was placed in the consolidation area under the fabric and sand cover, rather than disposed of off-site.

### 5.0 WORK REMAINING TO COMPLETE THE RELEASE ABATEMENT MEASURE

The following tasks remain to complete the work in Area 10:

- Remove approximately 50 cubic yards of contaminated soil from Area 5 and place the material under the cover in the Area 10 consolidation area. This material was overlooked in the May and June remediation work.
- Complete the three foot consolidation area cover, by adding approximately 2,000 cubic yards additional sand cover, a loam layer and hydroseeding.
- Obtain a Certificate of Compliance from the Norfolk Conservation Commission.
- Complete an Activity and Use Limitation and file the appropriate completion reports with the Department of Environmental Protection.



SECTION VII

ACCESS AGREEMENT

SCANNED

A. Property Owner Information:

Name of Property Owner: Buckley and Mann, Inc.

Address of Owner: 17 Lawrence Street (STREET)

Norfolk, MA 02056 (CITY/TOWN) (STATE) (ZIP CODE)

Telephone Number: 508-528-0695

Location of Property: 17 Lawrence Street (STREET)

Norfolk, MA 02056 (CITY/TOWN) (STATE) (ZIP CODE)

Site ID Number: 3-0173

B. ACCESS AGREEMENT:

I agree to allow access to the property located at 17 Lawrence Street (STREET)

Norfolk, MA 02056 (CITY/TOWN) (STATE) (ZIP CODE)

by Buckley and Mann, Inc. (APPLICANT) and his agents,

the Department of Environmental Quality Engineering and its agents and employees for the purpose of conducting a remedial response action.

Buckley & Mann Inc. (NAME OF PROPERTY OWNER)

[Signature] (SIGNATURE OF PROPERTY OWNER)

4/28/92 (DATE)

# INTERIM SITE CLASSIFICATION FORM

DISPOSAL SITE NAME Buckley and Mann, Inc.

SITE ID NUMBER 3-0173

STREET 17 Lawrence Street

CITY/TOWN Norfolk STATE MA ZIP CODE 02056

Completed by:

Name: Robert Dangel Company: Camp Dresser & McKee Inc.

Street: 10 Cambridge Center City/Town: Cambridge

State: MA Zip Code: 02142

## CLASSIFICATION SUMMARY

Complete following pages of form and summarize classification below:

Criterion	Met	Not Met	Insufficient Information
1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Recommended Site Classification:

Priority  
 Non-Priority  
 Insufficient Information to Classify

Signature: [Signature] Date: 4/28/92

12 West Adams St, Camp Dresser & McKee Inc

April 22, 1992

Publication # 15702-8-500-10-88-C.R.  
Approved by Ric Murphy, State Purchasing Agent

### FOR DEQE USE

DEQE Concurrence	Department's Determination on Site Classification		Comment
	Yes	No	
1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Priority  
 Non-Priority  
 Insufficient Information to Classify

Approved by: [Signature]

Title: Acting Section Chief

Date: 10/2/92

**INTERIM SITE CLASSIFICATION**

**Note:**

Check appropriate box for each criterion indicating whether a criterion is met or not met or if information is inadequate to determine whether a criterion is met. Only one of these three boxes should be checked for each criterion. A disposal site cannot be classified as a non-priority disposal site if information is inadequate for any criterion.

Met  Not Met

1. Criterion 1 is met if conditions at the disposal site provide the opportunity for direct contact with oil or hazardous materials via open lagoons, drum storage areas and sludges, or

If conditions at the disposal site provide the opportunity for direct contact with surface oil or hazardous materials and there is evidence of, or data that indicate, surface contamination at concentrations that could adversely affect human or environmental receptors.

**Supporting Information and Source:**

Field visits in 1990 and 1991 showed that wastewater sludges in Lagoons #1 and #2 had biodegraded. Soils still contain trace of dye carriers and metals, but not concentrations which would adversely affect human or environmental receptors.

Additional information is required to determine if Criterion 1 is met.  
Describe:

Met  Not Met

2. Criterion 2 is met if there is evidence of or data that indicate the presence of uncontained migrating oil or hazardous materials which exist as a separate phase in groundwater or surface water.

**Supporting Information and Source:**

Separate phase contaminants were not observed in groundwater or surface water  
Reference: Report on an Environmental Site Assessment at Buckley and Mann, Inc., Norfolk, MA, dated July 1986.

Additional information is required to determine if Criterion 2 is met.  
Describe:

Met  Not Met

3. Criterion 3 is met if there are data that indicate groundwater contamination with oil or hazardous materials at levels exceeding state or federal drinking water standards/guidelines (or detectable levels of contaminants for which there are not state/federal standards or guidelines) and

the data is based on samples taken from a location that:

- i. is within 2640 feet of a municipal water supply well(s), or
- ii. is within a mapped cone of influence of a municipal water supply well(s), or
- iii. is a private water supply well(s) or potentially affects a private water supply well,

unless there are data which indicate:

- i. that a hydrogeologic connection does not exist between the groundwater containing oil or hazardous materials and the municipal water supply well, or
- ii. that the identified concentrations of oil or hazardous materials, for which there are no drinking water standards or guidelines, are not and are not likely to be harmful to those drinking the water, or
- iii. that the oil or hazardous materials have not migrated to and are not likely to migrate to public or private water supply well(s).

**Supporting Information and Source:** 1) Groundwater quality around wastewater lagoons did not exceed reportable concentrations for metals; 2) municipal water wells Franklin Well #4 and Well #5 are over a mile away, the site is not within the cone of influence; 3) on-site private wells are upgradient and are not impacted by site contamination.  
Reference: Report on an Environmental Site Assessment at Buckley and Mann Inc., Norfolk, MA, dated July 1986.

Additional information is required to determine if Criterion 3 is met.  
Describe:

Met  Not Met

4. Criterion 4 is met if there is evidence of, or data that indicate that, a release of oil or hazardous materials at or from the disposal site into surface water has occurred and that the release is upstream of a potable surface water supply intake structure or of the recharge area of a municipal well(s),

unless there are data that indicate:

- i. that a hydrogeologic connection between the release of oil or hazardous materials into surface water and the recharge area does not exist, or
- ii. that concentrations of oil or hazardous materials at the surface water supply intake or the municipal well have not and are not likely to exceed State or Federal drinking water standard/guidelines, or
- iii. that concentrations of oil or hazardous materials at the surface water supply intake or the municipal well(s), for which there are no drinking water standards or guidelines, are not and are not likely to be harmful to those drinking the water.

**Supporting Information and Source:**

Upstream and downstream sampling of surface water yielded similar, background metals concentrations and detected no volatile organic compounds.

Reference: Report on an Environmental Site Assessment at Buckley and Mann, Inc., July 1986.

Additional information is required to determine if Criterion 4 is met.  
Describe:



**Met**  **Not Met**

5. Criterion 5 is met if there is evidence of, or data that indicate that, a release of oil or hazardous materials at or from the disposal site to surface water has resulted or could result in a concentration which exceeds Ambient Water Quality Criteria for the protection of aquatic life or human health.

**Supporting Information and Source:**

The Mill River passes through the site. The surface water quality measured downstream of the site did not exceed Ambient Water Quality Criteria for the hazardous material constituents on the site.  
Reference: Report on an Environmental Site Assessment at Buckley and Mann, Inc., July, 1986.

Additional information is required to determine if Criterion 5 is met.  
Describe:

**Met**  **Not Met**

6. Criterion 6 is met if there is evidence of, or data that indicate that, the disposal site poses a threat of fire or explosion.

**Supporting Information and Source:**

There is no free product at the site. TPH and Base Neutral Compounds in the soil do not pose a threat of fire or explosion.  
Reference: Status Report and Revised Lagoon Closure Plan, October 1990.  
Report on an Environmental Site Assessment at Buckley and Mann, Inc., July, 1986.

Additional information is required to determine if Criterion 6 is met.  
Describe:

**Met**  **Not Met**

7. Criterion 7 is met if there is evidence, or data that indicate that there are or there could be air emissions at or from the disposal site which could adversely impact human or environmental receptors.

**Supporting Information and Source:**

There are no air emissions at the site.

Additional information is required to determine if Criterion 7 is met.  
Describe:

**Met**  **Not Met**

8. Criterion 8 is met if there is evidence of, or data that indicate that, releases of oil or hazardous materials at or from the disposal site have affected or could affect the human food chain.

**Supporting Information and Source:**

Agricultural land and fish reserves are not impacted by the site.

Additional information is required to determine if Criterion 8 is met.  
Describe:

Met  Not Met

9. Criterion 9 is met if there are data or any other information that indicate that the disposal site may pose a significant or otherwise unacceptable risk of harm to health, safety, public welfare, or to the environment if left in its present state for several years. Note: This criterion is to be used only if none of the previous eight criteria were met, and no additional information is required.

**Supporting Information and Source:**

It is unlikely that contaminants from the Buckley and Mann site would pose a significant or unacceptable risk to health public welfare or the environment, if the site was left in its present state for several years. Much of the contaminated lagoon soil has been excavated and sampling of the stockpiled sludge in 1990 showed that natural degradation of organic contaminants was in progress.

Reference: (1) Report on an Environmental Site Assessment at Buckley and Mann, Inc., Norfolk, MA. July 1986.

(2) Status Report and Revised Lagoon Closure Plan for Buckley and Mann, Inc., October 1990.



SCANNED

RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 0173

A. SITE LOCATION:

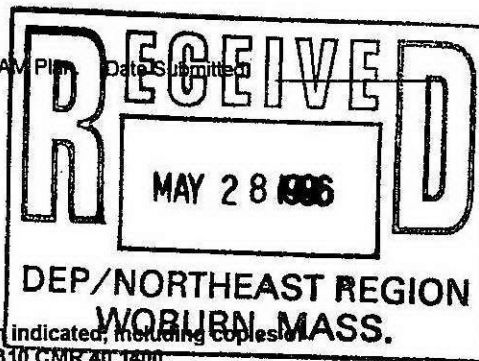
Site Name: (optional) Buckley and Mann, Inc.  
Street: 17 Lawrence Street Location Aid: Bush Pond  
City/Town: Norfolk, Massachusetts ZIP Code: 02056

Check here if a Tier Classification Submittal has been provided to DEP for this Release Tracking Number.

Related Release Tracking Numbers That This RAM or URAM Addresses: \_\_\_\_\_

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

- Submit a RAM Plan (complete Sections A, B, C, D, E, F, J, K, L and M).  
 Check here if this RAM Plan is an update or modification of a previously approved written RAM Plan. Date Submitted: \_\_\_\_\_
- Submit a RAM Status Report (complete Sections A, B, C, E, J, K, L and M).
- Submit a RAM Completion Statement (complete Sections A, B, C, D, E, G, J, K, L and M).
- Confirm or Provide URAM Notification (complete Sections A, B, H, K, L and M).
- Submit a URAM Status Report (complete Sections A, B, C, E, J, K, L and M).
- Submit a URAM Completion Statement (complete Sections A, B, C, D, E, I, J, K, L and M).



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. SITE CONDITIONS:

- Check here if the source of the Release or Threat of Release is known.  
If yes, check all sources that apply:  UST  Pipe/Hose/Line  AST  Drums  Transformer  Boat  Tanker Truck  Vehicle  Other Specify: Building debris, coal ash and textile plant wastes
- Identify Media and Receptors Affected: (check all that apply)  Air  Groundwater  Surface Water  Sediments  Soil  Wetlands  Storm Drain  Paved Surface  Private Well  Public Water Supply  Zone 2  Residence  School  Unknown  Other Specify: \_\_\_\_\_

Identify Release and/or Threat of Release Conditions at Site: (check all that apply)  
 2 and 72 Hour Reporting Condition(s)  120 Day Reporting Condition(s)  Other Condition(s)  
Describe: Metals, PAH and TPH from building debris, coal ash and textile plant wastes

RAMs may be conducted concurrently with an IRA only with written DEP approval  
URAMs may not be conducted if any 2 or 72 Hour conditions exist at the site.

Identify Oils and Hazardous Materials Released: (check all that apply)  Oils  Chlorinated Solvents  Heavy Metals  Others Specify: PAH, TPH

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

- Assessment and/or Monitoring Only
- Excavation of Contaminated Soils  
 Re-use, Recycling or Treatment  
○ On Site ○ Off Site Est. Vol.: \_\_\_\_\_ cubic yards  
Describe: \_\_\_\_\_
- Store ○ On Site ○ Off Site Est. Vol.: \_\_\_\_\_ cubic yards
- Deployment of Absorbant or Containment Materials
- Temporary Covers or Caps
- Bioremediation
- Soil Vapor Extraction
- Structure Venting System
- Product or NAPL Recovery

SECTION D IS CONTINUED ON THE NEXT PAGE.



RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 0173

D. DESCRIPTION OF RESPONSE ACTIONS (continued):

- Landfill  Cover  Disposal Est. Vol.: \_\_\_\_\_ cubic yards  Groundwater Treatment Systems
  - Removal of Drums, Tanks or Containers 100 to 300 for daily cover, 1000-2000 for disposal  Air Sparging
  - Describe: 3 Drums with soil and dye paste  Temporary Water Supplies
  - Removal of Other Contaminated Media  Temporary Evacuation or Relocation of Residents
  - Specify Type and Volume: \_\_\_\_\_  Fencing and Sign Posting
  - Other Response Actions Describe: \_\_\_\_\_
- See 310 CMR 40.0442 for limitations on the scope and type of RAMs.  
See 310 CMR 40.0464 for performance standards for URAMs.
- Check here if this RAM or URAM involves the use of Innovative Technologies. DEP is interested in using this information to aid in creating an Innovative Technologies Clearinghouse.  
Describe Technologies: \_\_\_\_\_

E. TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste has been sent to an off-site facility, answer the following questions)

Name of Facility: \_\_\_\_\_

Town and State: \_\_\_\_\_

Quantity of Remediation Waste Transported to Date: \_\_\_\_\_

F. RAM PLAN:

- Check here if this RAM Plan received previous oral approval from DEP as a continuation of a Limited Removal Action (LRA).  
Date of Oral Approval: \_\_\_\_\_
- If a RAM Compliance Fee is required, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. See 310 CMR 40.0444(2) to learn when a fee is not required.
- Check here if the RAM Plan is proposed for a Transition Site. If this is the case, you may need to attach an LSP Evaluation Opinion prior to undertaking the RAM, if not previously provided. See 310 CMR 40.0600 for further information about Transition Sites. Waiver

G. RAM COMPLETION STATEMENT: N/A

- If a RAM Compliance Fee is required in connection with submission of the RAM Completion Statement, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. You owe this fee when submitting a RAM Completion Statement if you received oral approval of a RAM that continued an LRA, and have NOT previously submitted a RAM Plan and accompanying fee.
- If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the RAM Completion Statement, you must submit a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the RAM Completion Statement.

H. URAM NOTIFICATION: N/A

- Identify Location Type: (check all that apply)  Public Right of Way  Utility Easement  Private Property
- Identify Utility Type: (check all that apply)  Sanitary/Combined Sewerage  Water  Drainage  Natural Gas
- Telephone  Steam Lines  Telecommunications  Electric  Other Specify: \_\_\_\_\_
- Check here if you provided DEP with previous oral notification of this URAM. Date of Oral Notice: \_\_\_\_\_
  - Check here if the property owner was NOT contacted prior to initiation of the URAM. If this is the case, you must attach an explanation of why the owner was not contacted, including the date and time when contact ultimately occurred.
  - Check here if this URAM will occur in connection with the construction of new public utilities. If this is the case, document the nature and extent of encountered contamination, the scope and expense of necessary mitigation and the benefits and limitations of project alternatives.
- With the exception stated below, the person undertaking the URAM must provide the name and license number of an LSP engaged or employed in connection with the URAM:
- LSP Name: \_\_\_\_\_ LSP License Number: \_\_\_\_\_

LSP information is not required if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by a Hazardous Material or a mixture of a Hazardous Material and Oil.





**RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Release Tracking Number

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

3 - 0173

**I. URAM COMPLETION STATEMENT:** N/A

Check here if this URAM was limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated by either a Hazardous Material or a mixture of a Hazardous Material and Oil.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the URAM Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the URAM Completion Statement.

**J. LSP OPINION:**

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

> if Section B of this form indicates that a Release Abatement Measure Plan is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that a Release Abatement Measure Status Report or a Utility-Related Abatement Measure Status Report is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

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

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

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

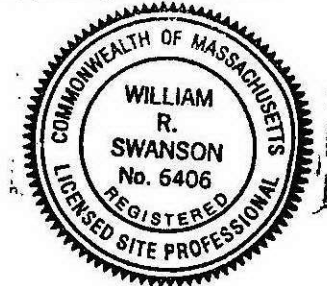
LSP Name: William R. Swanson LSP #: 6406 Stamp:

Telephone: 617-252-8000 Ext.: 8458

FAX: (optional) 617-621-2565

Signature: William R. Swanson

Date: 5/9/96



An LSP Opinion is not required for a Utility-Related Abatement Measure Notification.

An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by Hazardous Material or a mixture of Hazardous Material and Oil.

**K. PERSON UNDERTAKING RAM OR URAM:**

Name of Organization: Buckley and Mann Inc.

Name of Contact: Richard Mann/Stephen Mann Title: Owners

Street: 14 Bush Pond Lane

City/Town: Norfolk State: MA ZIP Code: 02056

Telephone: 617-828-0029 Ext.: X3427 SM FAX: (optional) \_\_\_\_\_  
X3442 RM

Check here if there has been a change in person undertaking the RAM or URAM.





**RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking Number

3 - 0173

**L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or URAM:** (check one)

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

**M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM:**

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

By: *Richard Mann* Title: President  
(signature)

For: Buckley and Mann, Inc. Date: 5/14/96  
(print name of person or entity recorded in Section K)

Enter address of person providing certification, if different from address recorded in Section K:

Street: N/A  
City/Town: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: \_\_\_\_\_  
Telephone: \_\_\_\_\_ Ext.: \_\_\_\_\_ FAX: (optional) \_\_\_\_\_

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

3-0173

NORFOLK  
SCANNING  
IN CONFERENCE  
STREET

Messrs. Richard and Stephen Mann  
Buckley & Mann Incorporated  
14 Bush Pond Road  
Norfolk, MA 02056

May 20 1996

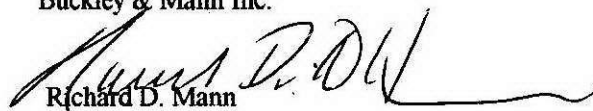
Department of Environmental Protection  
Northeast Regional Office  
10 Commerce Way  
Woburn, MA 01801

Subject: BWSC 3-0173

Buckley & Mann Inc certifies pursuant to 310 CMR 40.0442 (4) that it has sufficient financial resources to manage excavated materials, as part of a Release Abatement Measure, in the manner and time required by the Massachusetts Contingency Plan. For budgeting purposes, Buckley & Mann has made an allowance of \$100,000 for contaminated soil, as described in the attached Release Abatement Measure Plan and supporting report. The information and opinions in the Release Abatement Measure Plan were developed by William Swanson and Robert Dangel, Licensed Site Professionals with Camp Dresser & McKee Inc.

If you have questions, please contact us at 617 828 0029 extension 3442.

Buckley & Mann Inc.



Richard D. Mann  
President

Messrs. Richard and Stephen Mann  
Buckley & Mann Inc.  
14 Bush Pond Rd.  
Norfolk, MA 02056

May 20, 1996

Department of Environmental Protection  
Northeast Regional Office  
10 Commerce Way  
Woburn, MA 01801

Norfolk Conservation Commission  
Town Hall  
100 Main St.  
Norfolk MA 02056

Town of Norfolk Board of Selectmen  
Town Hall  
100 Main St.  
Norfolk, MA 02056

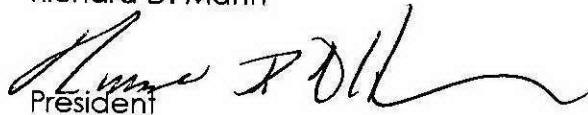
Town of Norfolk  
Zoning Board of Appeals  
town Hall  
100 Main St.  
Norfolk, MA 02056

Attn: Gerald Hughs

Enclosed are documents related to a proposed Release Abatement Measure for the Buckley & Mann property in Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173.

If you have questions, please contact us at (617) 828 0029 X3442

Richard D. Mann

A handwritten signature in black ink, appearing to read "Richard D. Mann", written over the printed name.

President  
Buckley & Mann Incorporated

BUCKLEY & MANN, INC.  
14 Bush Pond Road  
Norfolk, MA 02056

17 Lawrence St  
Norfolk  
SCANNED  
0173

March, 24, 1997

Department of Environmental Protection  
Northeast Regional Office  
10 Commerce Way  
Woburn, MA 01801

Enclosed please find a 120 day Status Report for the Release Abatement Measure at the Buckley & Mann property in Norfolk, Massachusetts. The site is Bureau of Waste Site Cleanup #3-0173.

If you have any questions, please contact either Stephen or Richard Mann at (617) 828-0029, X3427 or X3442.





**RELEASE & UTILITY-RELATED ABATEMENT  
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Release Tracking Number

3 - 0173

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

**I. URAM COMPLETION STATEMENT:**

Check here if this URAM was limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated by either a Hazardous Material or a mixture of a Hazardous Material and Oil.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the URAM Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the URAM Completion Statement.

**J. LSP OPINION:**

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> if Section B of this form indicates that a Release Abatement Measure Plan is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

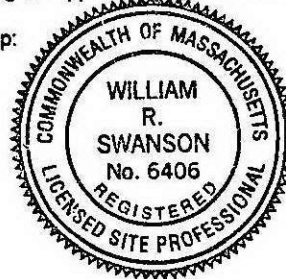
> if Section B of this form indicates that a Release Abatement Measure Status Report or a Utility-Related Abatement Measure Status Report is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

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

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

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

LSP Name: William R. Swanson LSP #: 6406 Stamp: \_\_\_\_\_  
Telephone: 617-252-8000 Ext.: 8458  
FAX: (optional) 617-621-2565  
Signature: [Handwritten Signature]  
Date: 3/19/97



An LSP Opinion is not required for a Utility-Related Abatement Measure Notification.

An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by Hazardous Material or a mixture of Hazardous Material and Oil.

**K. PERSON UNDERTAKING RAM OR URAM:**

Name of Organization: Buckley and Mann, Inc.  
Name of Contact: Richard Mann/Stephen Mann Title: Owners  
Street: 14 Bush Road Land  
City/Town: Norfolk State: MA ZIP Code: 02056  
Telephone: 617-828-0029 Ext.: X3427 SM FAX: (optional) \_\_\_\_\_  
X3442 RM

Check here if there has been a change in person undertaking the RAM or URAM.

RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS  
BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

Prepared by

CAMP DRESSER & McKEE INC.  
CAMBRIDGE, MASSACHUSETTS

March 1997

Robert A. Dangel  
Licensed Site Professional # 7798

William R. Swanson  
Licensed Site Professional # 6406



RELEASE ABATEMENT MEASURE (RAM) PLAN STATUS REPORT  
for  
BUCKLEY & MANN, INC., NORFOLK, MASSACHUSETTS

BUREAU OF WASTE SITE CLEAN-UP SITE NUMBER 3-0173

1. Previous filing

The RAM Plan was filed on May 28, 1996.

The previous RAM Status report was filed in September 1996.

2. Work since the last report

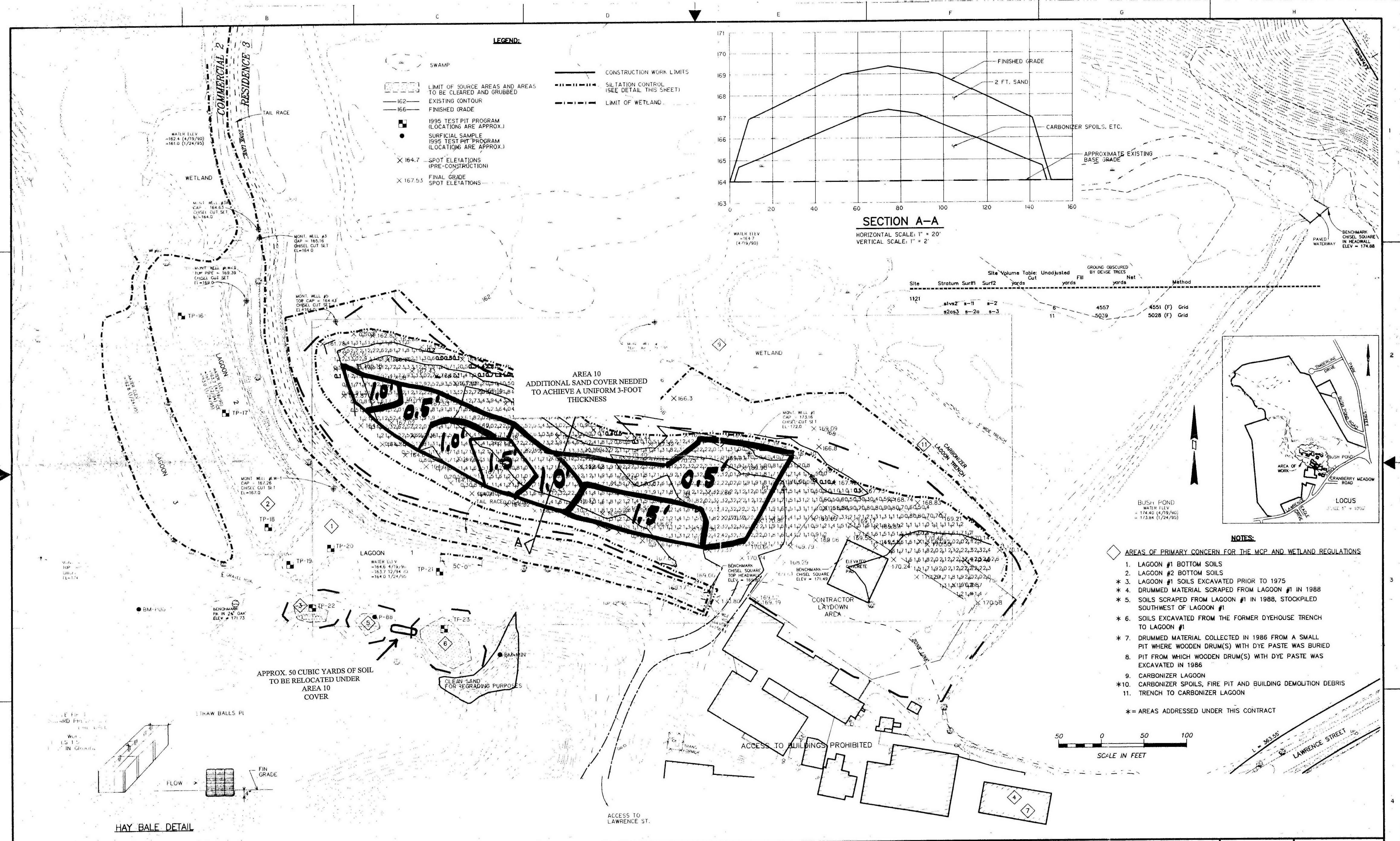
Revised plans and specifications have been prepared for excavation and removal of contaminated soil from Areas 3, 4, 5, 6, 7, 10 and 12.

Preliminary cost estimates for the work have been solicited from vendors and a soil excavation, transport and disposal/reuse budget has been established.

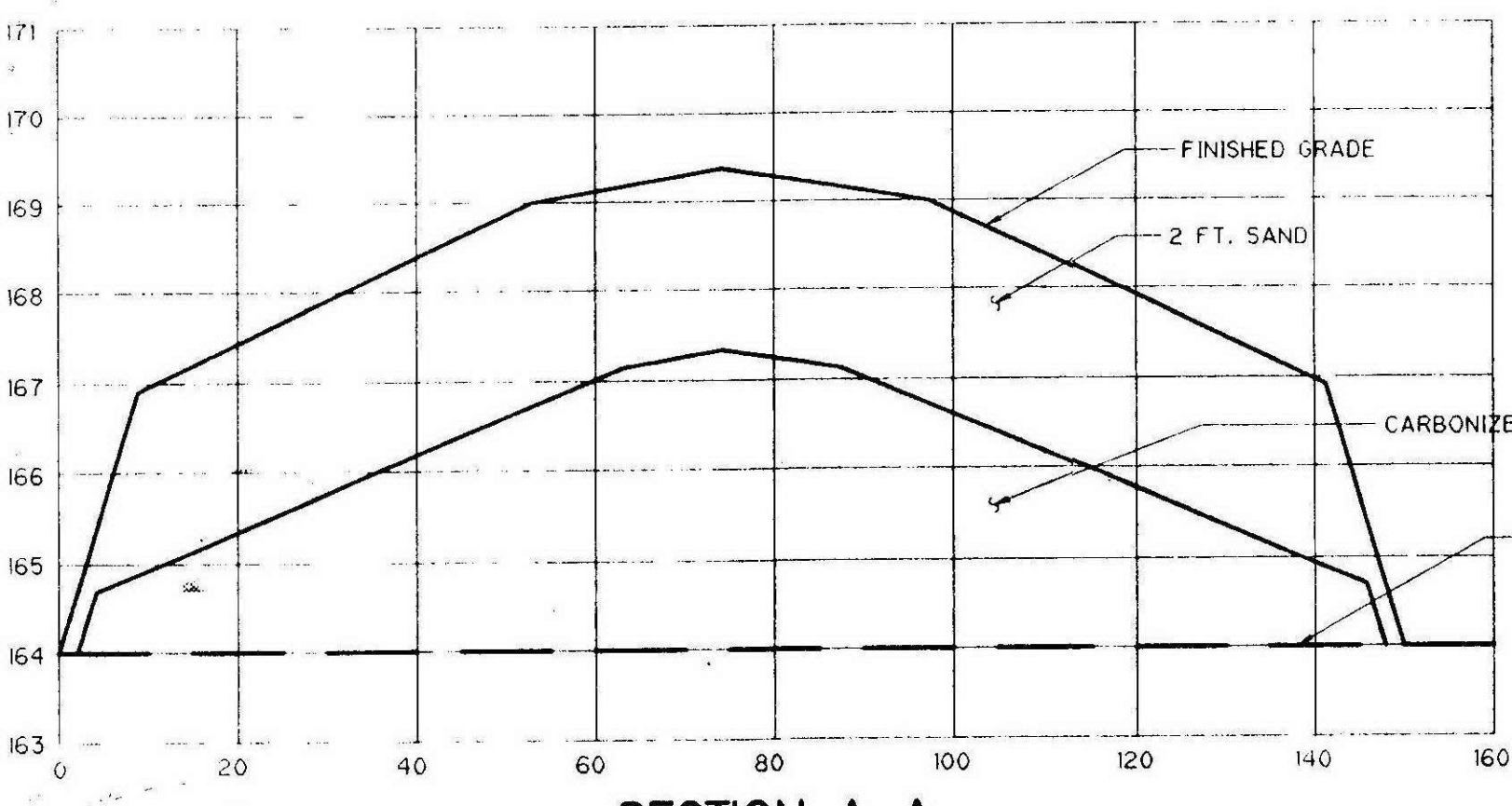
3. Work planned

Buckley & Mann is resolving the funding mechanism for remediation.





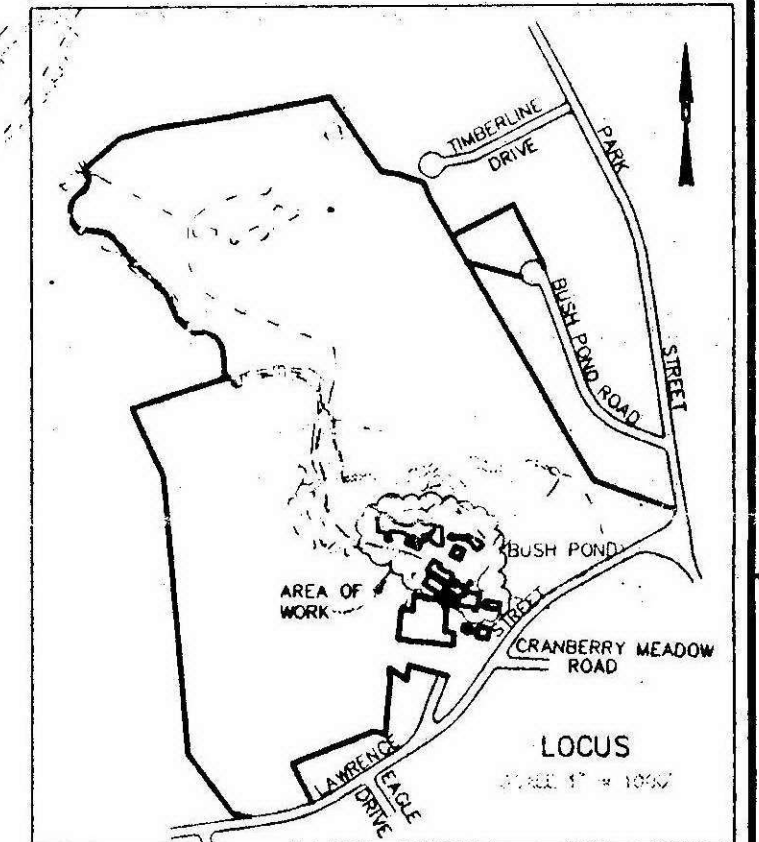
- LEGEND:**
- SWAMP
  - LIMIT OF SOURCE AREAS AND AREAS TO BE CLEARED AND GRUBBED
  - 162 EXISTING CONTOUR
  - 166 FINISHED GRADE
  - 1995 TEST PIT PROGRAM (LOCATIONS ARE APPROX.)
  - SURFICIAL SAMPLE
  - 1995 TEST PIT PROGRAM (LOCATIONS ARE APPROX.)
  - X 164.7 SPOT ELEVATIONS (PRE-CONSTRUCTION)
  - X 167.53 FINAL GRADE SPOT ELEVATIONS
  - CONSTRUCTION WORK LIMITS
  - SILTATION CONTROL (SEE DETAIL THIS SHEET)
  - LIMIT OF WETLAND



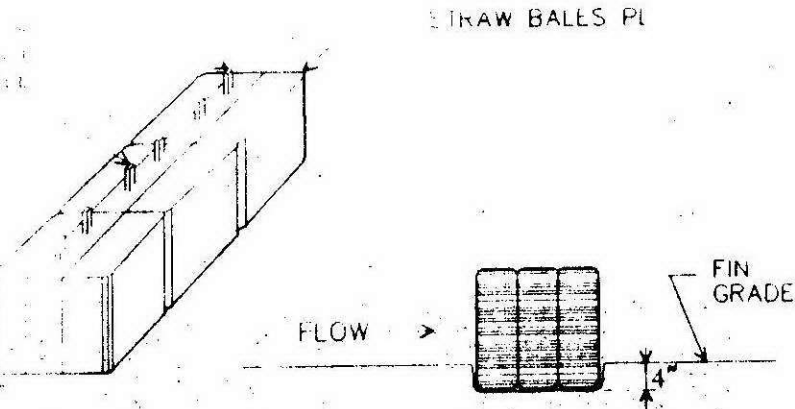
Site	Stratum Surf#1			Stratum Surf#2			Unadjusted	GROUND OBSCURED BY DEISE TREES	Method
	yards	yards	yards	yards	yards	yards			
1121	s1=s2	s-11	s-2	s2=s3	s-20	s-3	6	4557	4551 (F) Grid
							11	5039	5028 (F) Grid

AREA 10  
ADDITIONAL SAND COVER NEEDED TO ACHIEVE A UNIFORM 3-FOOT THICKNESS

APPROX. 50 CUBIC YARDS OF SOIL TO BE RELOCATED UNDER AREA 10 COVER



- NOTES:**
- 1. LAGOON #1 BOTTOM SOILS
  - 2. LAGOON #2 BOTTOM SOILS
  - \* 3. LAGOON #1 SOILS EXCAVATED PRIOR TO 1975
  - \* 4. DRUMMED MATERIAL SCRAPED FROM LAGOON #1 IN 1988
  - \* 5. SOILS SCRAPED FROM LAGOON #1 IN 1988, STOCKPILED SOUTHWEST OF LAGOON #1
  - \* 6. SOILS EXCAVATED FROM THE FORMER DYEHOUSE TRENCH TO LAGOON #1
  - \* 7. DRUMMED MATERIAL COLLECTED IN 1986 FROM A SMALL PIT WHERE WOODEN DRUM(S) WITH DYE PASTE WAS BURIED
  - 8. PIT FROM WHICH WOODEN DRUM(S) WITH DYE PASTE WAS EXCAVATED IN 1986
  - 9. CARBONIZER LAGOON
  - \* 10. CARBONIZER SPOILS, FIRE PIT AND BUILDING DEMOLITION DEBRIS
  - 11. TRENCH TO CARBONIZER LAGOON
- \* = AREAS ADDRESSED UNDER THIS CONTRACT



REV. NO.	DATE	DRW	CHK	DESCRIPTION
04	10/98		R.D.	
03	2/98	S.H.G.	R.A.D.	
02	12/97	M.J.C.	S.A.	
01	10/96	S.H.G.	R.A.D.	
00	2/28/95	C.C.C.	A.H.A.	

DESIGNED BY: C.A.K.  
 DRAWN BY: S.H.G.  
 CHECKED BY: R.A.D.  
 APPROVED BY:  
 ENGINEER:

CAMP DRESSER & McKEE  
 Ten Cambridge Center  
 Cambridge, Massachusetts 02142

BUCKLEY & MANN PROPERTY  
 NORFOLK, MASSACHUSETTS

SITE REMEDIATION PLAN

STAGE I - WORK AREAS 3,4,5,6,7 AND 10  
 FINAL GRADING

CDM PROJECT NO.  
 1121-22308  
 SHEET NO.  
 C-3

O:\1121\22308\CDM\CSTP\LOJ3.DWG