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February 18, 2021
File No. 01.0172397.10

Mr. Stephen Johnson
Deputy Regional Director
Massachusetts Department of Environmental Protection
Northeast Regional Office
Bureau of Waste Site Cleanup
205 B Lowell Street
Wilmington, Massachusetts 01887

Re: Tier Classification Extension Submittal
284 Winter Street
Haverhill, Massachusetts
RTNs 3-32792 and 3-32875
ACO 00009941NT

Dear Mr. Johnson:

On behalf of Boston Gas Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) has prepared this Tier Classification Extension Submittal for the Site referenced above. The submittal meets the February 20, 2021 deadline established by Administrative Consent Order (ACO) 00009941NT issued by the Massachusetts Department of Environmental Protection (MassDEP) on October 2, 2020 and will allow for the continuation of response actions at the Site under the provisions of the Massachusetts Contingency Plan (MCP), specifically Section 310 CMR 40.0560(7).

MassDEP transmittal forms BWSC-107 and BWSC-107B, which include the certifications required by 310 CMR 40.0560(7)(c)3-6, have been submitted electronically via the eDEP portal. Copies of these forms, and a statement providing the supporting documentation required by the MCP, are attached.

Please do not hesitate to contact Mr. Lindberg at 781-278-3700 if you have any questions concerning this project.

Very truly yours,
GZA GEOENVIRONMENTAL, INC.


Vijayalakshmi Radics
Senior Technical Specialist


Charles A. Lindberg, LSP
Senior Principal


Kyle A. Maxfield
Assistant Project Manager

Gregg McBride
Consultant/Reviewer

cc: Amy Willoughby, National Grid

Attachments: Supporting documentation



On behalf of Boston Gas Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. ("GZA") has prepared this Tier Classification (TC) Extension for the disposal site associated with the property located at 284 Winter Street, Haverhill, Massachusetts (Site). The Site is designated by the Massachusetts Department of Environment Protection (MassDEP) as Release Tracking Numbers (RTNs) 3-32792 and 3-32875.

This submittal is being filed per the requirements of Provision 8B of Administrative Consent Order (ACO) Enforcement Document 00009941NT issued by MassDEP on October 2, 2020, which established a February 20, 2021 deadline for the submittal of a TC Extension for the Site. The following sections provide a brief background and history of the Site, followed by the documentation required under Section 310 CMR 40.0560(7)(c) of the Massachusetts Contingency Plan (MCP).

BACKGROUND

The property at 284 Winter Street (Property) is currently owned by Haffner Realty Trust (Haffner) and is occupied by a gasoline service station and car wash facility. A Locus Map is included as Figure 1, and an Exploration Location Plan showing upland boring and monitoring well locations is presented as Figure 2.

The Property is bordered to the east by a Massachusetts Bay Transportation Authority (MBTA) railroad right-of-way, and to the north by Winter Street; these property boundaries also generally coincide with the eastern and northern disposal Site boundaries. To the south and southwest of the Property lies the open channel of the Little River, parts of which lie within the disposal Site boundary. The extent of the Site within the Little River has not yet been determined but will be the focus of an in-water Phase II Comprehensive Site Assessment (CSA) to be conducted later this year. The western extent of the Site, across the river, will also be documented in the Phase II CSA report.

Between 1853 and 1970, the Property was occupied by a Manufactured Gas Plant (MGP) facility operated by the Haverhill Gas Company, which originally manufactured coal gas. On-site infrastructure associated with the coal gas manufacturing process included two holders, retorts, condensers, and purifiers, as well as auxiliary sheds and other support structures. The manufactured gas was stored in holders on the Site until 1893, when storage was moved to holders located on Hilldale Avenue. Based on historical research documented in a previous report, the MGP facility was converted to a carbureted gas manufacturing facility that used gas oil to manufacture gas sometime between 1910 and 1912. Subsequently, in 1951, the MGP began producing oil gas until production ended in 1960. Most of the aboveground MGP infrastructure was demolished in the 1970s, but remnants of brick walls associated with the facility are still present along the northwest boundary of the property along the Little River.

OWNERSHIP AND REGULATORY HISTORY

In November 1976, the Property was sold by the Haverhill Gas Company to Haffner, which began operating a gasoline service station and car wash on the premises following underground storage tank (UST) installation in 1977. Home delivery fuel oil trucks were also refilled at the Site from 1977 until 2015 via a loading rack located east of the car wash building.

According to a February 1, 2017 memorandum prepared by MassDEP personnel, MassDEP was first notified of a release to the environment on April 19, 1988, when case number N88-552 was assigned to a release of tar material seeping into the Little River at 284 Winter Street. The memorandum indicates that no further information is available in MassDEP files regarding this notification.

In November 2014, Lessard Environmental, Inc. (Lessard) conducted an Environmental Site Assessment and Limited Site Investigation, during which they drilled and installed three groundwater monitoring wells at the Property. Analytical data indicated that soil samples submitted from boring B-1 and ground water samples collected from wells MW-1 and MW-2



had volatile petroleum hydrocarbons (VPH) and polycyclic aromatic hydrocarbons (PAHs) at concentrations above the relevant MCP Reportable Concentrations (RCs). Based on these findings, Haffner submitted a Release Notification Form (RNF) to MassDEP on March 30, 2015, and RTN 3-32792 was assigned to the release.

Subsequent response actions on behalf of Haffner were conducted by Ramboll US Corporation of Westford, Massachusetts (Ramboll), formerly known as Ramboll Environ. On May 12, 2015, while conducting response actions under RTN 3-32792, Ramboll observed a sheen in the Little River emanating from the base of the retaining wall along the western edge of the Property. Upon oral notification of this 2-hour reporting condition, MassDEP assigned RTN 3-32875 to the release and approved an Immediate Response Action (IRA) that included sheen containment via sorbent booms; assessment of the Site USTs; assessment of subsurface contamination that could be contributing to the sheen; and assessment of Site conditions that could represent an Imminent Hazard (IH) or Substantial Release Migration (SRM) condition. To meet these objectives, Ramboll installed sorbent socks in monitoring wells for light non-aqueous phase liquid (LNAPL) recovery, and installed sorbent booms in the Little River to limit downstream migration of the release.

In April 2016, Ramboll filed a Phase I Initial Site Investigation and Tier Classification Report, based on which the Site was classified as Tier I, and linked RTN 3-32875 to the primary Site RTN 3-32792¹. Ramboll on behalf of Haffner subsequently submitted a series of IRA status reports between September 2015 and September 2019.

Between October 18 and November 1, 2016, GZA on behalf of National Grid collected soil, groundwater, LNAPL, and soil vapor samples from the Site for laboratory analysis. The results were provided to Haffner for incorporation into the Conceptual Site Model (CSM). On November 29, 2016, MassDEP issued a Notice of Responsibility (NOR) to National Grid under RTN 3-32875, noting that the responsibility was joint and several with Haffner.

On October 11, 2019, MassDEP issued a Notice of Noncompliance (NON) to Haffner for failure to submit a Phase II CSA within three years of the Phase I/TC submittal. The NON established an April 6, 2020 deadline for submittal of a Phase II report and, if applicable a Phase III Remedial Action (RAP) and Phase IV Remedy Implementation Plan (RIP). On November 7, 2019, Haffner's LSP-of-Record submitted a Notification of Delay accompanied by a letter of resignation in anticipation of the transfer of responsibility from Haffner to National Grid, the successor company to a former owner of the property.

On November 26, 2019, GZA on behalf of National Grid submitted a TC transfer that took effect on December 26, 2019. In response, MassDEP issued an NOR to National Grid under RTN 3-32792, which was followed on March 13, 2020 by a notice re-establishing response action deadlines for the Site. The re-established deadlines required submittal of a Phase II CSA, and if necessary, a Phase III RAP and a Phase IV RIP, by August 4, 2020, and a Permanent Solution Statement (PSS)/Temporary Solution Statement (TSS)/Remedy Operation Status (ROS) by April 6, 2021.

Based on data collected in early 2020, National Grid contacted MassDEP in mid-2020 to discuss an additional extension to the Response Action deadlines. MassDEP and National Grid subsequently negotiated an ACO that established a deadline of September 12, 2025 for the filing of a PSS, TSS, or ROS for the Site. The ACO also established a series of interim deadlines for IRA status reports, MCP Phase reports, and this TC Extension.

¹A third RTN (3-34906) was issued in May 2018 for a 72-hour reporting condition associated with the removal of a diesel UST. Additional information about this RTN is provided in the compliance history section of this submittal.



TIER CLASSIFICATION EXTENSION DOCUMENTATION

The information provided below addresses the MCP requirements for Tier Classification Extensions as outlined in 310 CMR 40.0560(7)(c).

TRANSMITTAL FORM AND REASON FOR EXTENSION (310 CMR 40.040.0560(7)(C)(1))

A TC Transmittal Form (BWSC-107) with appended TC Compliance History Form (BWSC107B) was submitted electronically in accordance with the current MassDEP policy; copies are included as Attachment A.

The Response Actions conducted by Ramboll on behalf of Haffner between 2015 and 2019 were focused on IRA activities and did not culminate in a Phase II CSA report as required by the MCP. In early 2020, following the transition of response actions and investigation activities from Haffner to National Grid, National Grid promptly initiated extensive field activities in support of a Phase II CSA as further outlined in the following section of this submittal. The data from these investigations revealed that the upland and in-water extent of MGP impacts were greater than previously understood from earlier investigation. As documented in the ACO, complete delineation of these impacts and associated remediation activities will require additional access agreements, permitting, and measures to address safety and access issues related to working in and around the riverbed and shoreline (a steep river bank with an old retaining wall, a bridge, and a culvert). The Tier Classification Extension is being sought to obtain the necessary permits and agreements and allow the continuation of assessment and remedial response actions with the objective of meeting the ACO deadlines.

STATUS OF RESPONSE ACTIONS AND PROPOSED SCHEDULE (310 CMR 40.0560(7)(C)(2))

Phase II CSA efforts are currently in progress in both the upland and in-water portions of the Site. In January 2020, GZA oversaw the drilling and sampling of nine additional borings (B101 through B104, and B106 through B110) and the installation of monitoring wells B102, B106 and B107 to delineate the nature and extent of impact at the Property. This subsurface investigation program was complemented by the February 2020 collection of soil gas samples SG-1 through SG-3, and was followed in June 2020 by the collection and analysis of sediment samples from multiple transects across the Little River adjacent to the Property. Based on data that suggested that Site impacts may extend beyond the river to the west, three additional monitoring wells GZA-1, GZA-1A, and GZA-2 were installed at 191 and 221 Essex Street on August 31 and September 1, 2020. The locations of the 2020 explorations, as well as prior explorations conducted by Lessard and Ramboll between 2015 and 2019, and by GZA in 2016, are shown on Figure 2. The data from these multiple investigations are currently being evaluated and documented to meet the Site boundary delineation and risk characterization requirements of a Phase II CSA for the upland portions of the Site.

Concurrent with these upland Response Actions, National Grid has contracted Anchor QEA (AQ) of Beverly, Massachusetts to complete an assessment of impacts to the Little River within the disposal Site boundary. Efforts are currently underway to negotiate access with the MBTA for the collection of data from downstream locations. These data will be used to delineate the extent of impact and the associated risks to human health, public safety, welfare, and the environment associated with the in-water portions of the Site.

National Grid continues to conduct IRA Response Actions at the Site, and to document these Response Actions in IRA status reports, the most recent of which was submitted in September 2020. The next IRA status report will be submitted by March 12, 2021, and at subsequent six-month intervals until the IRA is completed. A Phase II CSA report will be submitted by April 6, 2022 and will be followed by the filing of a Phase III RAP and Phase IV RIP by June 15, 2022 and June 15, 2023, respectively. Following the selection and implementation of remedial Response Actions, a TSS, PSS, or ROS filing will be submitted by the ACO deadline of September 12, 2025.



CERTIFICATION REQUIRED BY 310 CMR 40.0009 (310 CMR 40.0560(7)(C)(3))

The required certification is provided on the attached form BWSC-107.

THE CERTIFICATION REQUIRED BY 310 CMR 40.0540(1) (310 CMR 40.0560(7)(C)(4))

The required certification is provided on the attached form BWSC-107.

UPDATED COMPLIANCE HISTORY (310 CMR 40.0560(7)(C)(5))

This section provides an updated compliance history since the filing of the April 2016 Tier Classification. The submittal dates listed below are based on records for RTNs 3-32792 and 3-32875 at the MassDEP Waste Site/Reportable Release file viewer website.

- September 8, 2016 – Ramboll on behalf of Haffner submitted IRA Status Report No. 3 documenting the removal of approximately 0.6 gallons of LNAPL between September 2015 and June 2016 via the use of sorbent socks in selected monitoring wells. The report also described permitting efforts related to the planned installation of a semi-permanent boom system in the Little River.
- November 29, 2016 – MassDEP issued a NOR to Boston Gas co. d/b/a National Grid under RTN 3-32875.
- March 7, 2017 – Ramboll submitted IRA Status Report No. 4 documenting the November 2016 installation of a semi-permanent containment boom system in the Little River. (The report was originally filed in eDEP under RTN 3-32792, and subsequently cross-filed in eDEP under RTN 3-32875 in February 2018). The report noted that GZA on behalf of National Grid had conducted environmental investigations at the Site in October and November 2016, and that the results had been provided to Haffner and would be incorporated into the evolving CSM.
- September 11, 2017 – Ramboll submitted IRA Status Report No. 5 documenting boom maintenance and the recovery of approximately 5 gallons of LNAPL via peristaltic pumping.
- March 8, 2018 – Ramboll submitted IRA Status Report No. 6 documenting boom maintenance and the recovery of approximately 3.3 gallons of LNAPL via peristaltic pumping.
- May 2, 2018 – a 6,000-gallon single-walled diesel UST was removed from the Property in the presence of representatives from Ramboll and GZA. Headspace readings of samples from this area exceeded the MassDEP 72-hour reporting threshold of 100 parts per million by volume (ppmV), resulting in a notification to MassDEP and the assignment of RTN 3-34906 to the release. The UST was removed, and the impacted pea gravel and sand fill material in the vicinity of the fill port (<3 cubic yards) were excavated and transported off-Site for disposal. No staining, odors, or elevated headspace readings were observed in the fill material in other areas according to a report filed by Ramboll. A confirmatory soil sample from beneath the UST was found to have no VPH constituents or extractable petroleum hydrocarbons (EPH) above laboratory reporting limits. Based on these findings, a PSS for RTN 3-34906 was submitted to MassDEP on July 2, 2018 by Ramboll on behalf of Haffner.
- September 10, 2018 – Ramboll submitted IRA Status Report No. 7 documenting boom maintenance and the recovery of approximately 5.1 gallons of LNAPL via peristaltic pumping.
- March 11, 2019 – Ramboll submitted IRA Status Report No. 8 documenting boom maintenance and the recovery of approximately 6.75 gallons of LNAPL via peristaltic pumping.



- September 9, 2019 – Ramboll submitted IRA Status Report No. 9 documenting boom maintenance and the recovery of approximately 7.5 gallons of LNAPL via peristaltic pumping. The report stated that approximately 29 gallons of LNAPL had been recovered from Site wells since the initiation of IRA activities, most of which (27.2 gallons) had been removed from well NFSB-02 (MW).
- October 16, 2019 – DEP issued a NON to Haffner for failure to submit a Phase II CSA within three years of TC and established a deadline of April 6, 2020 for the submittal of Phase II, Phase III, and Phase IV reports.
- November 7, 2019 – Haffner filed a Notification of Delay letter indicating that a settlement agreement had been executed with National Grid to allow the transfer of responsibility for future MCP response actions.
- November 7, 2019 – Mr. Eric Wood of Ramboll submitted an LSP-of-Record resignation letter.
- November 26, 2019 – GZA on behalf of National Grid filed TC Transfer documents to allow National Grid to begin MCP Response Actions as the Responsible/Potentially Responsible Party (RP/PRP) for the Site. Mr. Charles Lindberg of GZA assumed responsibility as LSP-of-Record for the Site.
- November 26, 2019 – Upon receipt of the Tier Classification Transfer submittal, MassDEP issued a NOR to Boston Gas Co. d/b/a National Grid for RTN 3-32792. MassDEP also required that a Phase II CSA report and, if necessary, a Phase III RAP and Phase IV RIP, be submitted by August 4, 2020, and that a PSS/TSS/ROS be filed by April 6, 2020 (*sic*). Subsequently, on March 13, 2020, MassDEP amended the PSS/TSS/ROS deadline from April 6, 2020 to April 6, 2021.
- March 17, 2020 - GZA on behalf of National Grid submitted IRA Status Report No. 10 documenting boom maintenance and the recovery of approximately 3.4 gallons of LNAPL via peristaltic pumping.
- July 24, 2020 – Following discussions with National Grid regarding the technical and logistical complexity of the Site, MassDEP suspended the deadlines set forth in the March 2020 letter and initiated the process of drafting an ACO with revised deadlines for completion of assessment and remedial response actions.
- September 11, 2020 - GZA submitted IRA Status Report No. 11 describing the installation of additional boom systems in the Little River, downstream of the system installed by Ramboll. The report documented the recovery of approximately 1.25 gallons of LNAPL from NFSB-02(MW) via peristaltic pumping, and the presence of over 4 feet of dense non-aqueous phase liquid (DNAPL) in well B107, located within a former relief holder at the Site.
- October 2, 2020 – MassDEP signed ACO Enforcement Document 00009941NT for the Site.

LSP OPINION (310 CMR 40.0560(7)(C)(6))

The required LSP Opinion is provided on the attached form BWSC-107.

ATTACHMENTS

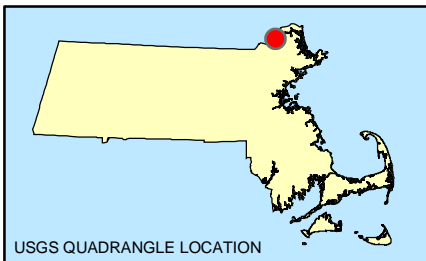
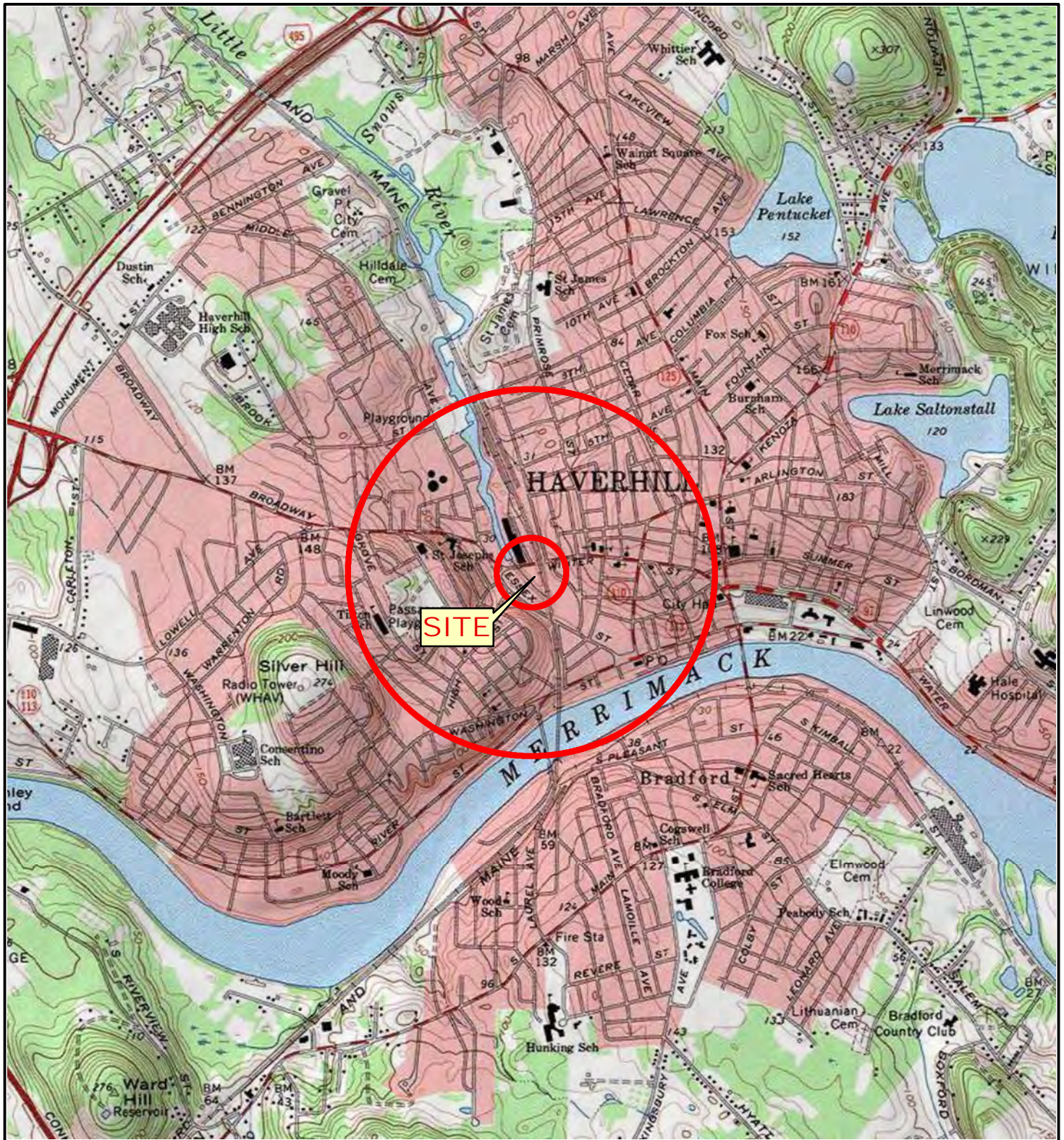
Figure 1: Locus Map

Figure 2: Exploration Location Plan

Attachment A: BWSC Forms 107 and 107B



Figures



SOURCE : THIS MAP CONTAINS THE ESRI ARCGIS ONLINE USA TOPOGRAPHIC MAP SERVICE, PUBLISHED JUNE 19, 2019 BY ESRI ARCGIS SERVICES AND UPDATED AS NEEDED. THIS SERVICE USES UNIFORM NATIONALLY RECOGNIZED DATUM AND CARTOGRAPHY STANDARDS AND A VARIETY OF AVAILABLE SOURCES FROM SEVERAL DATA PROVIDERS.

Data Supplied by :



PROJ. MGR.: KFM
DESIGNED BY: KFM
REVIEWED BY: CAL
OPERATOR: SMW/EMD
DATE: 01-18-2021

LOCUS PLAN
SHOWING 500 FOOT & 1/2 MILE RADII
PHASE II COMPREHENSIVE SITE ASSESSMENT
284 WINTER STREET
HAVERHILL, MASSACHUSETTS

JOB NO.
01.0172397.10
FIGURE NO.
1

© 2021 - GZA GeoEnvironmental, Inc. J:\170,000-179,999\172397\172397-10_KMFIGures\GIS\172397-10_PH2_FIG2_explorationLocation_v3.mxd, 1/19/2021, 2:45:58 PM, elaine.donohue



LEGEND

- GZ-1** MONITORING WELL INSTALLED BY GEOSearch, INC. AUGUST 31 - SEPTEMBER 1, 2020
- 1A** SEDIMENT SAMPLE COLLECTED BY GZA ON JUNE 8-10, 2020
- P1** PIPE LOCATION
- SG-1** SOIL GAS POINTS PERFORMED BY GZA ON FEBRUARY 5, 2020
- B102** MONITORING WELL PERFORMED BY GEOSearch ON JANUARY 21-23, 2020 AND OBSERVED BY GZA
- B101** SOIL BORING PERFORMED BY GEOSearch ON JANUARY 21-23, 2020 AND OBSERVED BY GZA
- NFAA-01** AMBIENT AIR SAMPLE COLLECTED BY GZA PERSONNEL OCTOBER 19, 2016
- NFSB-05** SOIL BORING PERFORMED BY TECHNICAL DRILLING SERVICES OCTOBER 20-25, 2016 AND OBSERVED BY GZA
- NFCB01** CATCH BASIN SEDIMENT SAMPLE COLLECTED BY GZA PERSONNEL OCTOBER 18-19, 2016
- NFSB-01 (MW)** MONITORING WELL INSTALLED BY TECHNICAL DRILLING SERVICES OCTOBER 20-25, 2016 AND OBSERVED BY GZA
- NFNP01** NAPL SAMPLE
- NFSV01** SOIL VAPOR SAMPLE COLLECTED BY GZA PERSONNEL OCTOBER 18-19, 2016
- ENV-1MW** MONITORING WELL INSTALLED BY RAMBOLL ENVIRON APRIL 27-28, 2015
- MW-1** MONITORING WELL INSTALLED BY LESSARD ENVIRONMENTAL, INC.
- ENV-2B(A)** SOIL BORING COMPLETED BY RAMBOLL ENVIRON APRIL 27-28, 2015

- PROPERTY BOUNDARY AS RECORDED ON ALTA/ACSM LAND TITLE SURVEY PLAN PERFORMED BY MHF DESIGN CONSULTANTS (STAMPED FEBRUARY 12, 2015)
- ASSESSORS PARCEL DATA PROVIDED BY MASSGIS ON SEPTEMBER 1, 2020

SOURCE

- THIS MAP CONTAINS THE ESRI ArcGIS ONLINE BING MAPS AERIAL LAYER PACKAGE, PUBLISHED APRIL 13, 2020 BY ESRI ARCSIMS SERVICES AND UPDATED MONTHLY. THIS SERVICE USES UNIFORM NATIONALLY RECOGNIZED DATUM AND CARTOGRAPHY STANDARDS AND A VARIETY OF AVAILABLE SOURCES FROM SEVERAL DATA PROVIDERS.
- THE LOCATIONS OF THE MONITORING WELLS INSTALLED BY GEOSearch AUGUST 31 - SEPTEMBER 1, 2020 WERE LOCATED FROM A SURVEY PERFORMED BY THE MORIN-CAMERON GROUP, INC. ON SEPTEMBER 29, 2020. THE LOCATIONS OF THE SEDIMENT SAMPLES COLLECTED BY GZA IN JUNE 2020 AND THE PIPE LOCATIONS WERE APPROXIMATELY DETERMINED USING A TRIMBLE GEO-7X HAND-HELD GPS ON 06-10-2020. THE LOCATIONS OF THE MONITORING WELLS AND SOIL BORINGS PERFORMED BY GEOSearch IN JANUARY 2020 WERE APPROXIMATELY DETERMINED USING A TRIMBLE GEO-7X HAND-HELD GPS ON 05-07-2020. THE LOCATIONS OF THE NF SERIES OF EXPLORATIONS AND SAMPLING LOCATIONS WERE APPROXIMATELY DETERMINED USING A TRIMBLE GEO-XH HAND-HELD GPS ON 10-18-2016. THE LOCATIONS OF THE SOIL GAS POINTS INSTALLED BY GZA IN FEBRUARY 2020 WERE APPROXIMATELY DETERMINED BY LINE OF SIGHT FROM EXISTING TOPOGRAPHIC AND MAN-MADE FEATURES. THESE DATA SHOULD BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD USED.
- THE LOCATIONS OF THE SOIL BORINGS AND MONITORING WELLS PERFORMED BY RAMBOLL AND THE MONITORING WELLS PERFORMED BY LESSARD WERE APPROXIMATELY DETERMINED FROM A PLAN PREPARED BY RAMBOLL ENTITLED: "SITE LAYOUT", FIGURE 2, DATED: 02-10-2017, PROJECT: 1690005598.



DRAFT

UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEONENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR THE USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.

PHASE II COMPREHENSIVE SITE ASSESSMENT
284 WINTER STREET
HAVERHILL, MASSACHUSETTS

EXPLORATION LOCATION PLAN

| | | | |
|--|---------------------------|--------------------------------------|--------------------|
| PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com | | PREPARED FOR: nationalgrid | |
| PROJ MGR: KFM | REVIEWED BY: CAL | CHECKED BY: KFM | FIGURE 2 |
| DESIGNED BY: KFM | DRAWN BY: SMW/EMD | SCALE: 1" = 50 FEET | |
| DATE: 01/19/2021 | PROJECT NO. 01.0172397.10 | REVISION NO. | |



Attachment A – Copies of BWSC Transmittal Forms



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 107

TIER CLASSIFICATION TRANSMITTAL FORM

Pursuant to 310 CMR 40.0500 (Subpart E)

Release Tracking Number

3 - 32792

A. DISPOSAL SITE LOCATION:

1. Disposal Site Name: HAFFNER'S

2. Street Address: 284 WINTER STREET

3. City/Town: HAVERHILL 4. ZIP Code: 018300000

5. Coordinates: Latitude: N 42.77723 Longitude: W 71.08760

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

- ☐ 1. Submit a new **Tier Classification Submittal**, including a **Tier Classification Compliance History** (BWSC107B).
Check the tier classification category:
- ☐ a. Tier I ☐ b. Tier II
- c. Check all Tier I criteria that apply, pursuant to 310 CMR 40.0520(2):
- ☐ i. Groundwater is located within an Interim Wellhead Protection Area, Zone II, or within 500 feet of a Private Water Supply Well, 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.
- ☐ ii. An Imminent Hazard is present at the time of Tier Classification.
- ☐ iii. One or more remedial actions are required as part of an Immediate Response Action pursuant to 310 CMR 40.0414(2).
- ☐ iv. One or more response actions are required as part of an Immediate Response Action to eliminate or mitigate a Critical Exposure Pathway pursuant to 310 CMR 40.0414(3).
- ☐ d. Check here if including an **Eligible Person, Eligible Tenant, or Other Person Certification** (BWSC107D)
- ☐ 2. Submit a **Phase I Completion Statement** as per 310 CMR 40.0480.
If previously submitted, provide date _____
mm/dd/yyyy
- ☐ 3. Submit a **Phase II Scope of Work** as per 310 CMR 40.0834.
If previously submitted, provide date _____
mm/dd/yyyy
- ☐ 4. Submit a **Phase II Conceptual Scope of Work supporting a Tier Classification Submittal**.
- ☒ 5. Submit a **Tier Classification Extension Submittal** for Response Actions at a Tier Classified Site including the **Tier Classification Compliance History** (BWSC107B).
- ☐ 6. Submit a **Tier Classification Transfer Submittal** for a change in person(s) undertaking Response Actions at a Tier Classified Site including the **Tier Classification Compliance History** (BWSC107B) and the **Tier Classification Transferor Certification** (BWSC107C).
Proposed effective date of transfer : _____
mm/dd/yyyy



TIER CLASSIFICATION TRANSMITTAL FORM

Pursuant to 310 CMR 40.0500 (Subpart E)

Release Tracking Number

3 - 32792

B. THIS FORM IS BEING USED TO: (cont.)

☐ 7. Submit a **Revised Tier Classification Submittal**.

Check the revised Tier Classification Category. If the Tier Classification Category is not changing, indicate the current classification.

☐ a. Tier I ☐ b. Tier II

c. Check all Tier I criteria that apply, pursuant to 310 CMR 40.0520(2):

☐ i. Groundwater is located within an Interim Wellhead Protection Area, Zone II, or within 500 feet of a Private Water Supply Well, 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.

☐ ii. An Imminent Hazard is present at the time of Tier Classification.

☐ iii. One or more remedial actions are required as part of an Immediate Response Action pursuant to 310 CMR 40.0414(2).

☐ iv. One or more response actions are required as part of an Immediate Response Action to eliminate or mitigate a Critical Exposure Pathway pursuant to 310 CMR 40.0414(3).

☐ d. Check here if including an **Eligible Person, Eligible Tenant, or Other Person Certification** (BWSC107D)

☐ 8. Provide a **Notice that an additional Release Tracking Number(s) is (are) being linked to this Tier Classified Site** (Primary RTN). Future response actions addressing the Release or Threat of Release notification condition associated with additional Release Tracking Numbers (RTNs) will be conducted as part of the Response Actions planned or ongoing at the Primary Site listed above. For a previously Tier Classified Primary Site, if there is a reasonable likelihood that the addition of the new secondary RTN(s) would change the classification of the site, a **Revised Tier Classification Submittal** must also be made.

Provide Release Tracking Number(s): a. - b. -

All future Response Actions must occur according to the deadlines applicable to the Primary RTN. Use only the Primary RTN when making future submittals for this site unless specifically relating to response actions started before the linking occurred.



TIER CLASSIFICATION TRANSMITTAL FORM

Pursuant to 310 CMR 40.0500 (Subpart E)

Release Tracking Number

3 - 32792

C. LSP SIGNATURE AND STAMP:

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 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

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

> if Section B of this form indicates that a **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) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that a **Phase II Scope of Work** 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) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that a **Tier Classification Extension Submittal** or a **Tier Classification 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.

1. LSP#: 6891

2. First Name: CHARLES A

3. Last Name: LINDBERG

4. Telephone: 781-278-3830

5. Ext.:

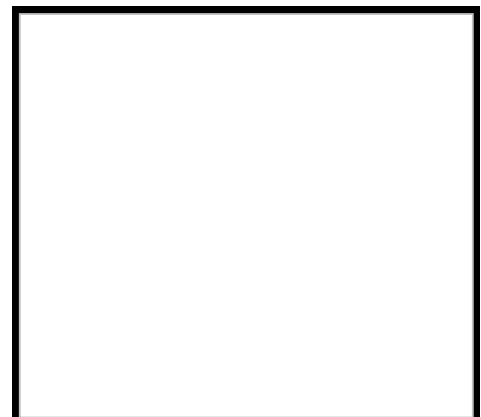
6. Email: CHARLES.LINDBERG@GZA.COM

7. Signature:

8. Date:

mm/dd/yyyy

9. LSP Stamp:





Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 107

TIER CLASSIFICATION TRANSMITTAL FORM

Pursuant to 310 CMR 40.0500 (Subpart E)

Release Tracking Number

3 - 32792

D. PERSON MAKING SUBMITTAL:

1. Check all that apply: ☒ a. change in contact name ☒ b. change of address ☐ c. change in the person undertaking response actions

2. Name of Organization: BOSTON GAS CO D/B/A NATIONAL GRID

3. Contact First Name: AMY A 4. Last Name: WILLOUGHBY

5. Street: 280 MELROSE STREET 6. Title: PROGRAM MANAGER, SIR NEW ENGLAND

7. City/Town: PROVIDENCE 8. State: RI 9. ZIP Code: 029070000

10. Telephone: 781-907-3644 11. Ext.: _____ 12. Email: amy.willoughby@nationalgrid.com

E. RELATIONSHIP OF PERSON MAKING SUBMITTAL TO DISPOSAL SITE: ☐ Check here to change relationship

- ☒ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter
- ☒ e. Other RP or PRP Specify: OTHER PRPS
- ☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ 4. Any Other Person Making Submittal Specify Relationship: _____

F. REQUIRED ATTACHMENT AND SUBMITTALS:

- ☒ 1. 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.
- ☐ 2. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of any Phase Reports to DEP.
- ☐ 3. Check here to certify that a copy of the Legal Notice of a Tier Classification or Re-classification Submittal is attached, and a cover letter and a copy of the notice is sent to the Chief Municipal Officer and the Local Board of Health pursuant to 310 CMR 40.0510(3) and 40.1403.
- ☐ 4. Check here to certify that the owner of a Public Water Supply has been provided written notice pursuant to 310 CMR 40.0510(3).
- ☒ 5. For a Tier Classification Extension Submittal, check here to certify that a statement summarizing why a Permanent or Temporary Solution has not been achieved at the Disposal Site is attached.
- ☐ 6. For a Tier Classification Transfer Submittal, check here to certify that a statement summarizing the reasons for the proposed change in person(s) undertaking the Response Actions is attached. All Response Actions must be completed by the deadline applicable to the person who first filed a Tier Classification Submittal for the Disposal Site.
- ☐ 7. Check here if any non-updatable information provided on this form is incorrect, e.g., Release Address/Location Aid. Send corrections to bwsc.edep@state.ma.us.
- ☒ 8. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



TIER CLASSIFICATION TRANSMITTAL FORM

Pursuant to 310 CMR 40.0500 (Subpart E)

Release Tracking Number

3 - 32792

G. CERTIFICATION OF PERSON MAKING SUBMITTAL:

1. 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.

If submitting a Tier II Classification, Extension or Transfer, I also 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. 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.

2. By: _____ 3. Title: PROGRAM MANAGER, SIR NEW ENGLAND
Signature

4. For: BOSTON GAS CO D/B/A NATIONAL GRID 5. Date: _____
(Name of person or entity recorded in Section D) mm/dd/yyyy

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section D.

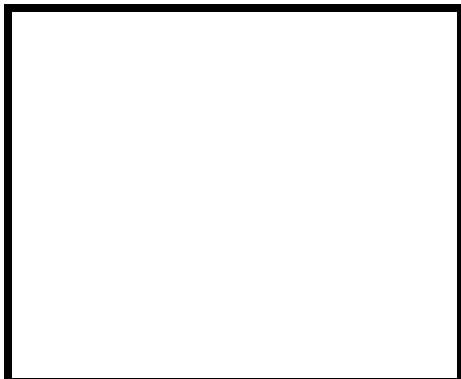
7. Street: _____

8. City/Town: _____ 9. State: _____ 10. ZIP Code: _____

11. Telephone: _____ 12. Ext.: _____ 13. Email: _____

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY 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.

Date Stamp (DEP USE ONLY):





TIER CLASSIFICATION COMPLIANCE HISTORY

Pursuant to 310 CMR 40.0540 (Subpart E)

Release Tracking Number

3

- 32792

A. DISPOSAL SITE COMPLIANCE HISTORY SUMMARY:

- ☐ 1. Check here if a Tier Classification Compliance History of the person listed in BWSC107, Section D, was previously submitted, and there has been no change in that person's compliance history, or the person in Section D has no compliance history. If this box is checked, this section does not have to be completed.

2. 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 |
|---|---------------|-----------------|-------------|
| a. Air Quality | | | |
| b. Hazardous Waste (M.G.L. c. 21C) | | | |
| c. Solid Waste | | | |
| d. Industrial Wastewater Management | | | |
| e. Water Supply | | | |
| f. Water Pollution Control/Surface Water | | | |
| g. Water Pollution Control/Groundwater | | | |
| h. Water Pollution Control/Sewer Connection | | | |
| i. Wetland & Waterways | | | |

3. 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 mm/dd/yyyy |
|---|-----------------------|---------------------------|
| MASSDEP BWSC - ADMINISTRATIVE CONSENT ORDER | 00009941NT | 10/2/2020 |
| | | |
| | | |
| | | |

- ☒ 4. Check here to certify that, if needed, a statement further describing the Compliance History of this Disposal Site is attached.

This statement must describe the compliance history of the person or entity named in BWSC107, Section D 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.



GZA GeoEnvironmental, Inc.