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November 26, 2019  
File No. 01.0172397

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

Re: Tier I Classification Transfer  
Haffner Realty Trust MCP Disposal Site  
284 Winter Street  
Haverhill, Massachusetts  
Release Tracking Numbers (RTNs) 3-32792 and 3-32875

To Whom It May Concern:

On behalf of Boston Gas Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) has prepared this Tier Classification Transfer to document the change in the Responsible Party for the above-referenced disposal site (the "Site"). This submittal is intended to address the requirements of section 40.0560(8) of the Massachusetts Contingency Plan (MCP); a completed Bureau of Waste Site Cleanup (BWSC) transmittal form (BWSC107) is attached.

On March 30, 2015 Ramboll US Corporation, formerly known as Ramboll Environ, of Westford, Massachusetts (Ramboll) submitted a Release Notification Form (BWSC 101 Form) notifying the Massachusetts Department of Environmental Protection (MassDEP) of a release of oil to soil exceeding reportable concentration(s) and affecting more than two cubic yards and a release of oil to groundwater exceeding reportable concentration(s). MassDEP assigned RTN 3-32792 to the Site upon completion of the notification. An additional RTN (3-32875) was assigned on May 12, 2015 to address a 2-hour notification condition under the MCP, which was logged by MassDEP as a "sudden release" of 10 gallons of petroleum and as an "oil sheen on surface water". Ramboll made the notifications for both of these incidents on behalf of Haffner Realty Trust (HRT), the owner of the 284 Winter Street property. Ramboll has been conducting assessment and remediation activities under an Immediate Response Action (IRA) Plan at the Site since its submission on July 17, 2015. The objectives of the IRA Plan activities were to:

- Contain/mitigate the sheen and light, non-aqueous phase liquid (LNAPL) emanating from the Site into the Little River and prevent them from travelling/migrating downstream in the Little River;
- Monitor/mitigate the LNAPL that had been observed within certain groundwater monitoring wells;
- Identify tar-like material within a pipe adjacent to the Little River and attempt to identify the potential source of the material;
- Determine whether a potential release from the current petroleum underground storage tanks (USTs) could be the source of the sheen observed in the river;
- Determine whether the observed contamination in the subsurface of the Site could be contributing to the observed sheen; and,
- Determine whether Site conditions are present that could represent an Imminent Hazard (IH) and/or Substantial Release Migration (SRM) as defined in the Massachusetts Contingency Plan (MCP), associated with potential contamination in subsurface utilities at the Site.



Under the IRA, Ramboll provided oversight for the installation and maintenance containment booms within the Little River intended to control/mitigate sheens discharging from the base of the masonry retaining wall running along the western perimeter of the Site. A temporary boom was installed initially, followed by a semi-permanent boom which remains in place. Ramboll has also been gauging the monitoring wells at the Site for the presence of LNAPL and recovering product (where applicable) on a monthly basis. The IRA work has been documented in status reports submitted regularly between September 2015 and September 2019. Soil and groundwater sampling were also conducted and a Phase I Initial Site Investigation was submitted in April 2016 to address the MCP requirements for the two release incidents.

Since Ramboll submitted the IRA Plan in July 2015 the following MCP documents have been submitted:

1. September 11, 2015: IRA Status Report No. 1
2. March 13, 2016: IRA Status Report No. 2;
3. April 5, 2016: Phase I Initial Site Investigation;
4. May 4, 2016: Phase I Tier Classification Public Notification;
5. September 8, 2016: IRA Status Report No. 3;
6. March 7, 2017: IRA Status Report No. 4;
7. September 7, 2017: IRA Status Report No. 5;
8. March 6, 2018: IRA Status Report No. 6;
9. September 5, 2018: IRA Status Report No. 7;
10. March 7, 2019: IRA Status Report No.8;
11. April 8, 2019: Notification of Delay Response Action Deadline Form, under RTN 3-32875;
12. September 6, 2019: IRA Status Report No. 9; and
13. November 7, 2019: Notification of Delay Response Action Deadlines Form, under RTN 3-32792.

The April 2019 Notification of Delay in Compliance with Response Action Deadline submittal indicated that ongoing negotiations between HRT and National Grid (the successor company to a former owner of the property) were taking longer than originally anticipated. Therefore, a Phase II Complete Site Assessment (CSA) had not been completed by the original deadline of April 6, 2019. It is GZA's understanding that HRT did not initiate the Phase II work in the period following submittal of the Phase I report in April 2016 through the present. National Grid has assumed the role of Responsible/Potentially Responsible Party (RP/PRP) for the Site under the MCP.

It should also be noted that GZA has conducted environmental investigations at the Site on behalf of National Grid. These investigations included soil vapor sampling and laboratory analyses; a subsurface exploration program (test borings) and monitoring well installation; soil, groundwater, and LNAPL sampling and laboratory analyses.

National Grid and GZA understand that as part of the Tier Transfer from Haffner to National Grid, a Phase II CSA Report needs to be provided to MassDEP by April 6, 2020. Due to this restricted time frame, GZA is requesting that MassDEP waive the 30-day presumptive approval period that is typically required for a Tier Classification Transfer and authorize National Grid to begin supplemental assessment work upon submittal of this document.



If you have any questions, please contact the undersigned at (781) 278-3830 or e-mail at [charles.lindberg@gza.com](mailto:charles.lindberg@gza.com).

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read "Kyle F. Maxfield".

Kyle F. Maxfield  
Assistant Project Manager

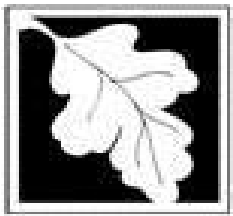
A handwritten signature in blue ink, appearing to read "Gregg McBride".

Gregg McBride, LSP  
Consultant/Reviewer

A handwritten signature in blue ink, appearing to read "Charles A. Lindberg".

Charles A. Lindberg, LSP  
Senior Principal

cc: Amy Willoughby (National Grid)



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 42.77728 Longitude: W 71.08774

**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 : 12/2/2019  
mm/dd/yyyy



Massachusetts Department of Environmental Protection  
*Bureau of Waste Site Cleanup*

**TIER CLASSIFICATION TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0500 (Subpart E)

**BWSC 107**

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.



Massachusetts Department of Environmental Protection  
Bureau of Waste Site Cleanup

**TIER CLASSIFICATION TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0500 (Subpart E)

**BWSC 107**

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*

**TIER CLASSIFICATION TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0500 (Subpart E)

**BWSC 107**

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 COMPANY D/B/A NATIONAL GRID
3. Contact First Name: AMY 4. Last Name: WILLOUGHBY
5. Street: 40 SYLVAN ROAD 6. Title: PROGRAM MANAGER, SIR NEW ENGLAND
7. City/Town: WALTHAM 8. State: MA 9. ZIP Code: 024511120
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: FORMER OWNER
- ☐ 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](mailto:bwsc.edep@state.ma.us).
- ☒ 8. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



Massachusetts Department of Environmental Protection  
*Bureau of Waste Site Cleanup*

**TIER CLASSIFICATION TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0500 (Subpart E)

**BWSC 107**

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 COMPANY 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: \_\_\_\_\_

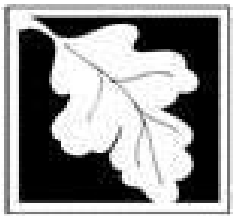
11. Telephone: \_\_\_\_\_ 12. Ext.: \_\_\_\_\_ 13. Email: \_\_\_\_\_

**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:

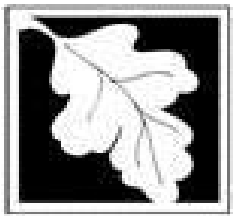
Program	Permit Number	Permit Category	Facility ID
a. Air Quality			
b. Hazardous Waste (M.G.L. c. 21C)			
c. Solid Waste			
d. Industrial Wastewater Management			
e. Water Supply			
f. Water Pollution Control/Surface Water			
g. Water Pollution Control/Groundwater			
h. Water Pollution Control/Sewer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

- ☒ 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.**



**Massachusetts Department of Environmental Protection**  
*Bureau of Waste Site Cleanup*

**BWSC 107C**

**TIER CLASSIFICATION TRANSFEROR CERTIFICATION**

Pursuant to 310 CMR 40.0560 (Subpart E)

Release Tracking Number

3 - 32792

**A. PERSON TRANSFERRING A TIER CLASSIFICATION:**

1. Check all that apply: ☐ a. change in contact name ☐ b. change of address

2. Name of Organization: HAFFNER REALTY TRUST

3. Contact First Name: JOANNE 4. Last Name: FOURNIER

5. Street: 575 OSGOOD STREET #2313 6. Title: TRUSTEE

7. City/Town: NORTH ANDOVER 8. State: MA 9. ZIP Code: 018450000

10. Telephone: 9786832771 11. Ext.:  12. Email:

**B. RELATIONSHIP TO THE DISPOSAL SITE OF PERSON TRANSFERRING A TIER CLASSIFICATION:**

☐ Check here to change relationship

☒ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter

☒ e. Other RP or PRP Specify: ELIGIBLE PERSON-21E

☐ 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:

**C. CERTIFICATION OF PERSON TRANSFERRING TIER CLASSIFICATION:**

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.

2. By:  3. Title: TRUSTEE  
Signature

4. For: HAFFNER REALTY TRUST 5. Date:   
(Name of person or entity recorded in Section A) mm/dd/yyyy

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

7. Street:

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

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