

Dr. Carl Rosenbloom
Board of Health (Health and Inspection Services)
City of Haverhill
4 Summer Street, Room 210
Haverhill, MA 01830

**Phase I Initial Site Investigation and Tier Classification under the MCP
Haffner Realty Trust; 284 Winter Street, Haverhill, MA
MassDEP Release Tracking Number (RTN) 3-32792 and 3-32875**

Dear Dr. Rosenbloom:

Date April 6, 2016

A release of oil and/or hazardous materials (OHM) has occurred at the above-referenced location (the "site"), which is a disposal site as defined by M.G.L. c. 21E, § 2 and the Massachusetts Contingency Plan, 310 CMR 40.0000. To evaluate the release, a Phase I Initial Site Investigation (ISI) was completed pursuant to 310 CMR 40.0480. The site has been classified as Tier I pursuant to 310 CMR 40.0500. On April 6, 2016, Haffner Realty Trust filed a Tier I Classification Submittal with the Department of Environmental Protection (MassDEP).

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www.ramboll-environ.com

The Tier Classification Submittal and the disposal site file can be viewed at the MassDEP website using Release Tracking Number (RTN) 3-32792 and 3-32875 at <http://public.dep.state.ma.us/SearchableSites2/Search.aspx> or at MassDEP, Northeast Region Service Center, 205B Lowell Street, Wilmington, MA or by telephone: 978.694.3200. Additional public involvement opportunities are available under 310 CMR 40.1403(9) and 310 CMR 40.1404.

A copy of the public notice per 310 CMR 40.1403(2) and disposal site map are attached to this letter in addition to a copy of the Phase I Conclusions presented in the Phase I ISI report.

To obtain more information on this disposal site, please feel free to contact me.

Yours sincerely,



Eric S. Wood, PHg, PG, LSP
Principal
Environment & Health
D 978.449.0343
eswood@environcorp.com

Copy: MassDEP: Northeast Region Service Center
Attachment A: Public Notice of Tier Classification
Attachment B: Disposal Site Map
Attachment C: Phase I Conclusions

Attachment A:
Public Notice of Tier Classification

NOTICE OF TIER CLASSIFICATION

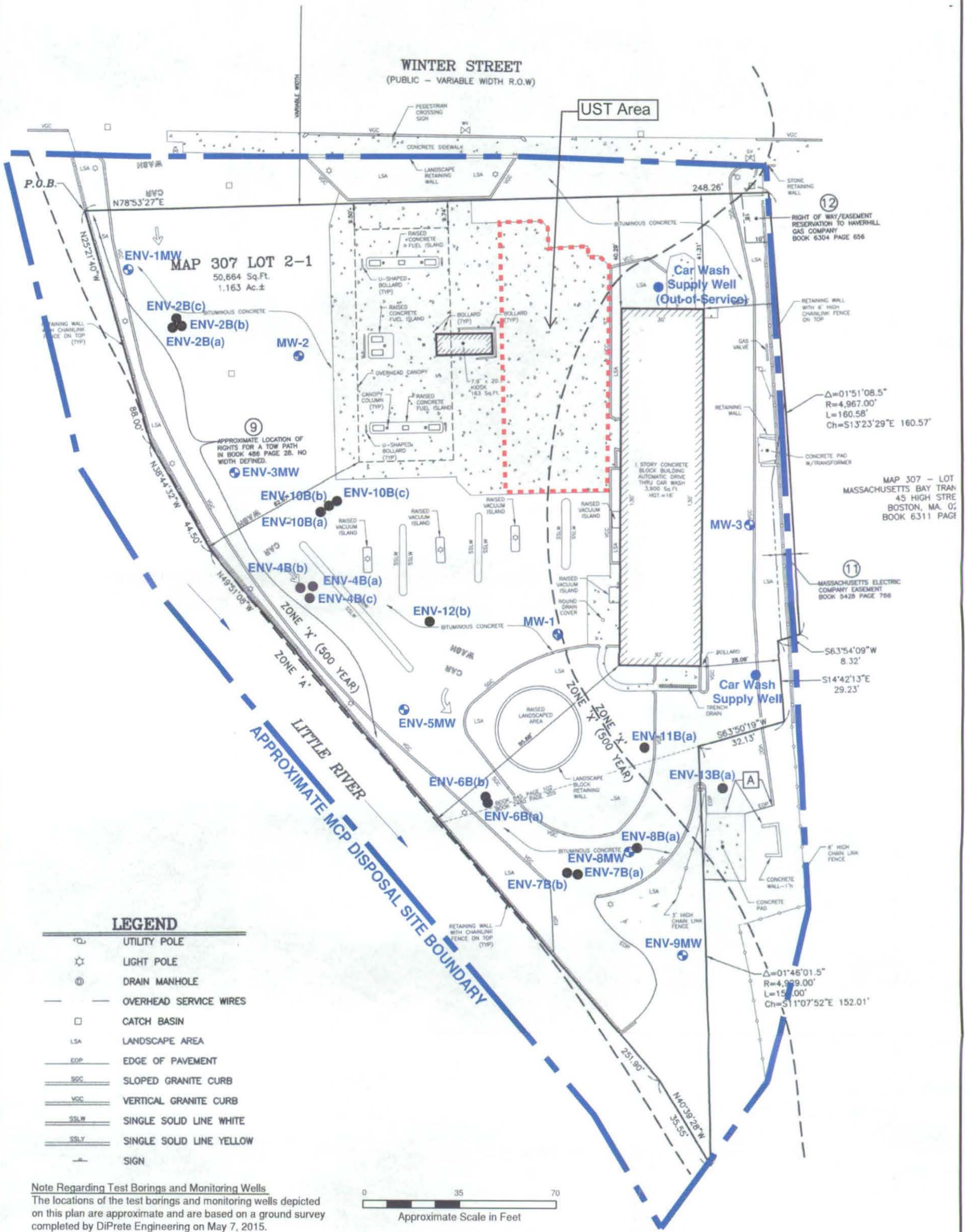
Haffner Realty Trust

284 Winter St, Haverhill, MA

RTNs 3-32792 and 3-32875

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Attachment B:
Disposal Site Map



- LEGEND**
- UTILITY POLE
 - LIGHT POLE
 - DRAIN MANHOLE
 - OVERHEAD SERVICE WIRES
 - CATCH BASIN
 - LANDSCAPE AREA
 - EDGE OF PAVEMENT
 - SLOPED GRANITE CURB
 - VERTICAL GRANITE CURB
 - SINGLE SOLID LINE WHITE
 - SINGLE SOLID LINE YELLOW
 - SIGN

Note Regarding Test Borings and Monitoring Wells
The locations of the test borings and monitoring wells depicted on this plan are approximate and are based on a ground survey completed by DiPrete Engineering on May 7, 2015.

EXPLANATION
MW-1 Test boring/monitoring well completed by Lessard Environmental, Inc.
ENV-8MW Test boring/monitoring well completed by Ramboll Environ
Soil test boring completed by Ramboll Environ

Source: ALTA/ACSM Land Title Survey prepared by MHF Design Consultants, Inc. dated January 30, 2015 and stamped for approval on February 12, 2015.

RAMBOLL ENVIRON

Site Layout
Haffner Realty Trust
284 Winter Street, Haverhill, Massachusetts

Figure 3

DRAFTED BY: JGMILES DATE: 3/21/2016

Attachment C: **Phase I Conclusions**

PHASE I CONCLUSIONS

The disposal Site is identified with MassDEP RTNs 3-32792 and 3-32875 due to the presence of impacted soil and groundwater exceeding MCP 120-day notification thresholds as well as a condition of Substantial Release Migration (SRM) due to the observance of a sheen on surface water (the Little River) adjacent to the Site.

The analytical data and information collected to date indicate that the source of oil and/or hazardous materials (OHM) contamination is likely related to the historical operation of the MGP facility. Information indicating that the Haffner gasoline station, associated Underground Storage Tanks (USTs), transfer piping, or dispensers is a source of the contamination has not been identified. This conclusion is substantiated by the following:

- No information has been found to indicate there has been a reportable release from the USTs or ancillary equipment.
- OHM contamination indicative of Manufactured Gas Plant (MGP) waste was observed to be widespread across the Site.
- Methyl tert-butyl ether (MTBE), a highly water soluble indicator of historical gasoline releases, was not detected above laboratory reporting limits in any of the soil or groundwater samples collected at the Site.
- Forensic analysis of a tar-like material found in the subsurface at the Site and a tar-like material observed to be discharging from a pipe protruding from the western retaining wall of the Site are consistent with coal tar generated using a carburetted water gas process.
- Forensic analysis of a light non-aqueous phase liquid (LNAPL) observed to be emanating from a space between several stones at the base of the retaining wall indicates it may be related to the petroleum feedstock used in the carburetted water gas process or a gas purification by-product (e.g. scrubber oil or drip oil).

An Immediate Response Action (IRA) Plan, dated July 17, 2015, was submitted to the MassDEP with the primary objective to contain/mitigate the sheen and LNAPL emanating from the Site into the Little River and prevent them from travelling/migrating downstream in the Little River¹. Temporary sorbent booms installed in conjunction with the IRAs have been partially successful at containing the sheens observed to be discharging to the Little River; however, it is apparent that a more robust semi-permanent containment boom system will need to be installed to allow for ongoing effective containment of the sheen with rising river stage during the forthcoming period when additional investigations and comprehensive response actions can be completed with the ultimate goal of achieving a Permanent Solution at the Site.

Based on the information presented in this Phase I Report, the following outcome is provided in accordance with 310 CMR 40.0486 (1):

Comprehensive Response Actions are necessary at the disposal Site. Tier Classification of the Site pursuant to the provisions of 310 CMR 40.0500 shall be undertaken by RPs, PRPs, or Other Persons, if necessary, and prior to the initiation of Comprehensive Response Actions.

¹ This objective, as directed by MassDEP, was to assess the potential for the occurrence of SRM associated with the existing, in-service subsurface storm water conveyances.

RECEIVED

APR 11 2016

NORTHEAST REGIONAL OFFICE

Mayor Jim Fiorentini
City of Haverhill
4 Summer Street, Room 100
Haverhill, MA 01830

**Phase I Initial Site Investigation and Tier
Classification under the MCP
Haffner Realty Trust; 284 Winter Street, Haverhill, MA
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NORTHEAST REGIONAL OFFICE

Attachment A:
Public Notice of Tier Classification

NOTICE OF TIER CLASSIFICATION

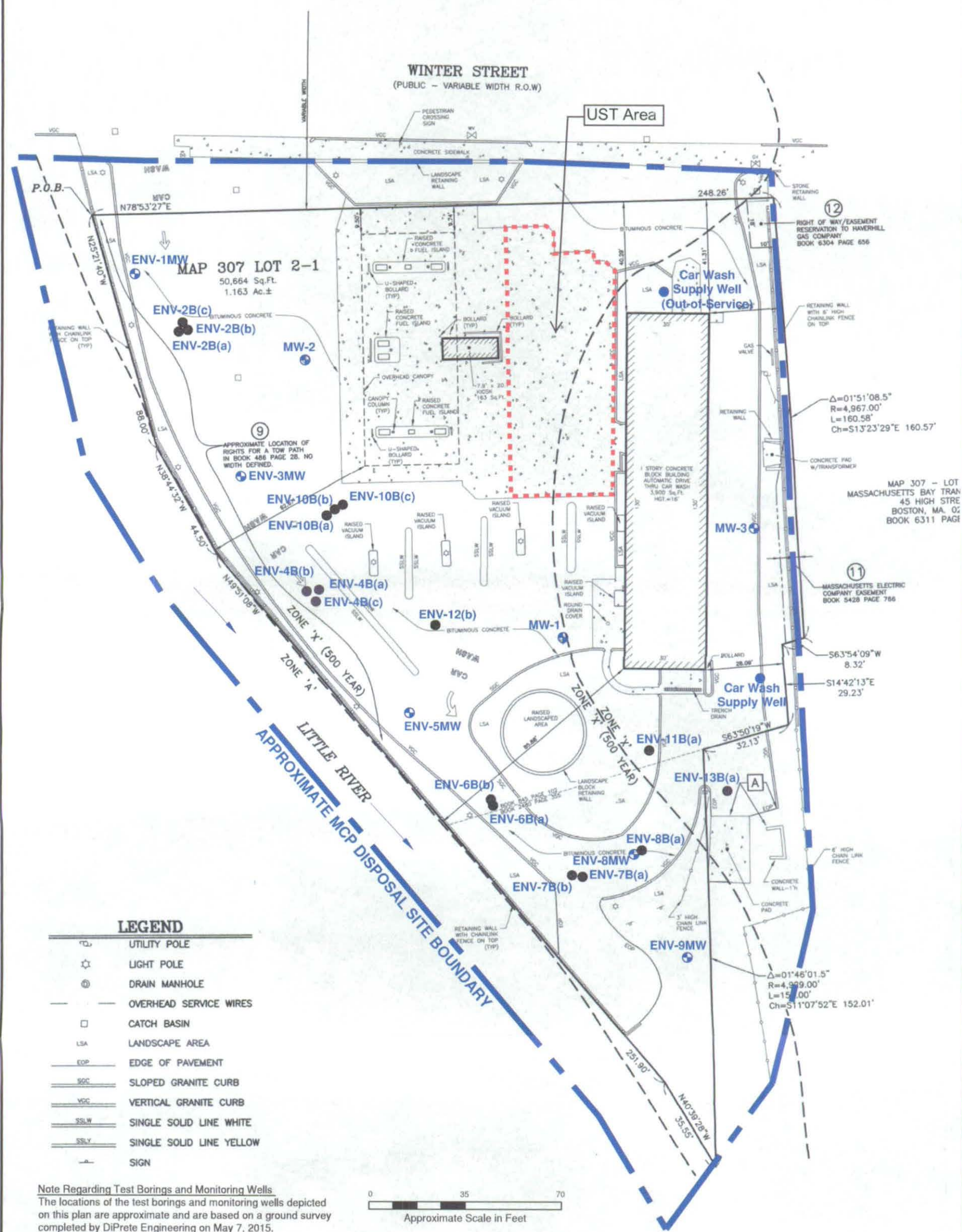
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