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Northeast Regional Office (Region 3)
Wilmington, Massachusetts 01887**

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March 2017

IMMEDIATE RESPONSE ACTION STATUS REPORT NO. 4

**HAFFNER REALTY TRUST
284 WINTER STREET
HAVERHILL, MA**

Haffner Realty Trust
284 Winter Street, Haverhill, MA
Immediate Response Action Status Report No. 4
RTN 3-32875

Revision

Date **March 6, 2017**

Made by **John M. Noble**

Checked by **Eric S. Wood**

Approved by **Eric S. Wood**

Ref 08-36060F

Ramboll Environ
3 Carlisle Road
Suite 210
Westford, MA 01886
USA
T +1 978 449 0300
F +1 978 449 0301
www.ramboll-environ.com

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Acronyms and Abbreviations

BOL	Bill of Lading
CHES	Clean Harbors Environmental Services
HFD	Haverhill Fire Department
IH	Imminent Hazard
IRA	Immediate Response Action
MassDEP	Massachusetts Department of Environmental Protection
MassGIS	Massachusetts Geographic Information System
MCP	Massachusetts Contingency Plan
MGP	Manufactured Gas Plant
NAPL	Non-Aqueous Phase Liquid
OHM	Oil and/or Hazardous Material
PPE	Personal Protective Equipment
RNF	Release Notification Form
SRM	Condition of Substantial Release Migration
UST	Underground Storage Tank

1. INTRODUCTION

Ramboll Environ US Corporation (Ramboll Environ) has prepared this Immediate Response Action (IRA) Status Report No. 4, on behalf of Haffner Realty Trust (Haffner), pursuant to the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000) for the Haffner property located at 284 Winter Street in Haverhill, MA (the "Site"). A Site Location Map is presented as **Figure 1**.

The Site is identified with Massachusetts Department of Environmental Protection (MassDEP) Release Tracking Numbers (RTNs) 3-32792 and 3-32875. RTN 3-32792 is associated with impacted soil and groundwater exceeding 120-day notification thresholds, as reported to MassDEP on March 30, 2015¹. RTN 3-32875 is associated with the 2-hr verbal notification made to MassDEP on May 12, 2015 due to the observance of a sheen on surface water (the Little River). Also on May 12, 2015, light non-aqueous phase liquid (LNAPL) was observed in groundwater monitoring wells at the Site at thicknesses exceeding 120-day notification thresholds. **Appendix A** contains the MassDEP Notice of Responsibility (NOR) for RTN 3-32875, dated June 3, 2015. The Release Notification Form (RNF) for RTN 3-32875 was filed with MassDEP on July 10, 2015.

The IRA Plan associated with RTN 3-32875 was submitted to the MassDEP on July 17, 2015. Subsequent IRA status reports were submitted to the MassDEP on the following dates:

- IRA Status Report No. 1: September 11, 2015.
- IRA Status Report No. 2: March 13, 2016.
- IRA Status Report No. 3: September 8, 2016.

Figure 2 is a Site Layout Plan showing the Site features and items documented in this IRA Status report, including the location of the semi-permanent containment boom system installed in the Little River from October 24, to November 3, 2016 in conjunction with the ongoing IRA.

1.1 Person Responsible for Conducting Immediate Response Actions

Contact Name: Joanne D. Fournier
Title: President
Name of Organization: Haffner Realty Trust
Address: 575 Osgood Street, #2205, North Andover, MA 01845*
Telephone Number: 978-494-2607
* Note change in address

1.2 Licensed Site Professional Managing Immediate Response Actions

Name: Eric S. Wood, PHg, PG, LSP
Company: Ramboll Environ
Address: 3 Carlisle Road, Suite 210, Westford, MA 01886
20 Custom House Street, Suite 800, Boston, MA 02110
Phone: 978-449-0343
E-mail: eswood@ramboll.com
LSP No: 7262

1.3 IRA Objectives

As documented in the IRA Plan, the objectives of the IRA activities are to:

¹ This IRA Status Report is for RTN 3-32875 and is not associated with RTN 3-32792.

- Contain/mitigate the sheen and 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 groundwater monitoring wells ENV-3MW and ENV-9MW in May 2015;
- Identify the tar-like material being discharged from the pipe discharging into 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 MCP, associated with potential contamination in subsurface utilities at the Site².

1.4 IRA Activities

The IRA Plan indicated that in order to meet the objectives noted above, the following IRA activities needed to be completed:

- Conduct ongoing inspection and maintenance of the temporary sorbent booms that had been placed in the Little River to assess their effectiveness at containing the release and preventing its migration downstream. If the temporary boom was observed to have been damaged or breached, it would be replaced, until a more permanent boom installation could be completed;
- Install a semi-permanent containment boom system;
- Install sorbent socks and conduct monthly groundwater and LNAPL gauging at on-Site monitoring wells where LNAPL has been observed; and
- Conduct laboratory analysis and an evaluation of the discovered tar-like substance and LNAPL observed to be discharging to the Little River from the wall along the western perimeter of the Site.

1.5 Content of the IRA Status Report

As specified by 310 CMR 40.0425(3) of the Massachusetts Contingency Plan (MCP), an IRA Status Report shall contain at a minimum the following information:

- (a) Status of assessment and/or remedial actions;
- (b) Any significant new site information or data;
- (c) Details and/or plans for the management of remediation waste, remedial wastewater and/or remedial additives;
- (d) Any other information, required by the Department; and,
- (e) An LSP Opinion to whether the IRA is being conducted in conformance with the IRA Plan and any conditions of approval established by the Department.

² 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.

2. STATUS OF ASSESSMENT AND REMEDIAL ACTIONS

2.1 Inspection and Maintenance of the Temporary Containment Booms

As noted in the IRA Plan, the original temporary sorbent containment booms spanning the Little River downstream from the observed sheen were installed on May 12, and May 18, 2015. Based on the performance of the initial temporary booms, Ramboll Environ contracted Clean Harbors Environmental Services (CHES) to remove the initial temporary booms and replace them with temporary booms running along the retaining wall along the western perimeter of the Site, parallel with the river. This was completed on July 13, 2015. These temporary booms were maintained until the semi-permanent containment boom system was installed, as described below.

During this IRA reporting period, monthly inspections of the temporary boom were completed on the following dates.

- September 27, 2016; and
- October 25, 2016.

As detailed below in **Section 2.2**, the temporary booms were removed and replaced with the semi-permanent containment boom system following the October 25, 2016 inspection.

In addition, during this IRA reporting period, the temporary containment boom was replaced on September 12, 2016, due to saturation with NAPL and water.

2.2 Installation of the Semi- Permanent Containment Boom System

From October 24 to November 3, 2016, under Ramboll Environ oversight, CHES installed the semi-permanent containment boom system originally proposed in the IRA Plan. The semi-permanent containment boom was installed in the Little River under an emergency authorization pursuant to Massachusetts Waterways Regulations 310 CMR 9.20, issued by the MassDEP on October 19, 2016 (**Appendix B**). **Figure 2** shows the approximate extent of the semi-permanent containment boom system.

The semi-permanent containment boom is intended to control/mitigate sheens discharging into the Little River from the base of the mixed masonry retaining wall running along the western perimeter of the Site until Comprehensive Response Actions can be conducted to address the source and stop the discharge. The containment boom system consists of boom support structures to which are attached a curtain/flotation boom, and sorbent "sausage" booms, which are described in more detail below.

The boom support structures consist of 14 horizontal aluminium supports installed at approximate 20-foot intervals along the retaining wall. The boom supports are constructed of square aluminum tubing attached to the concrete wall with stainless steel base plates and wedge anchors. The supports extend approximately 8 to 19 feet from the retaining wall. Schedule 80 aluminium boom-support pipes extend vertically downward from the horizontal tubing and rest on square aluminum base plates resting on the river bed. The boom supports are reinforced with gusset plates, additional aluminum piping, and stainless steel cables (2 per support) anchoring the vertical pipes to the retaining wall for additional stability (See **Site Sketch, CHES Figure 1 in Appendix C**).

The curtain/flotation boom is attached to the boom support structures using metal rings which allow for the boom to rise and fall on the supports with changing river levels allowing the containment boom to remain on the water surface where it will be most effective containing sheens emanating from the retaining wall. There are also ropes affixed to the curtain/flotation boom and boom

supports that allow for the manual adjustment of the containment boom, if necessary. Finally, replaceable sorbent “sausage” booms are attached to the inside of the curtain/flotation boom which can be replaced as necessary (as they become saturated with LNAPL). New sorbent “sausage” booms were installed on November 2nd during the installation of the semi-permanent containment boom system.

The installation of the semi-permanent containment boom system was documented in two (2) Construction-Period Status Reports to the Haverhill Conservation Commission, dated October 28, and November 8, 2016, respectively, contained in **Appendix D**. The Construction-Period Status Reports include photos of the construction process.

2.3 Inspection and Maintenance of the Semi-Permanent Containment Boom System

Since its installation, monthly inspections of the semi-permanent containment boom system were completed on the following dates in conjunction with the regularly scheduled monthly IRA Site visits:

- November 22, 2016;
- December 21, 2016;
- January 26, 2017; and
- February 24, 2017.

In addition, supplemental inspections were conducted on the following dates, following significant precipitation events, to evaluate overall containment system performance:

- November 16, 2016;
- December 1, 2016;
- December 14, 2016;
- January 4, 2017;
- January 25, 2017; and
- February 16, 2017.

Appendix E contains an IRA photolog documenting the IRA Site visits.

2.4 Monthly Groundwater and LNAPL Gauging

Table 1 summarizes the 21 LNAPL/groundwater gauging events conducted at the Site to date from May 12, 2015 through February 24, 2017. **Figure 2** also highlights the wells in which measurable LNAPL has historically been detected (ENV-3MW, ENV-8MW, and ENV-9MW).

Immediately prior to the September 4, 2015 and subsequent gauging events through June 24, 2016, sorbent socks were maintained in wells that have historically contained measurable LNAPL (ENV-3MW, ENV-8MW, and ENV-9MW), or an observed sheen (ENV-1MW and ENV-5MW). During gauging events, the sorbents were removed, weighed, and containerized for off-Site disposal with the spent sorbent booms from the river. Following the June 24, 2016 IRA event, sorbent socks have not been re-installed in the wells to facilitate LNAPL assessment activities as described in the new MassDEP LNAPL Guidance Policy³, specifically the measurement of stabilized LNAPL thicknesses, persistence, and mobility.

- As noted in the IRA Plan, on May 12, 2015 during the initial round of LNAPL/groundwater gauging, LNAPL was observed in Site monitoring wells ENV-3MW and ENV-9MW at thicknesses of 0.02 and 0.03 feet, respectively.

³ MassDEP. 2016. Light Nonaqueous Phase Liquids (LNAPL) and the MCP: Guidance for Site Assessment and Closure. Policy #WSC-16-450. February 19, 2016.

- During the second gauging event conducted on August 6, 2015, measurable LNAPL was detected in wells ENV-3MW (0.22 feet), ENV-8MW (0.04 feet), and ENV-9MW (0.19 feet). A sheen was observed in ENV-5MW on that date.
- With the exception of ENV-9MW located in the southern portion of the Site, no measurable LNAPL has been detected in any of the Site wells during the gauging events conducted on and after September 4, 2015.
- LNAPL was detected in ENV-9MW during the five (5) gauging events conducted from October 2016 through February 2017, at thicknesses ranging from 0.01 to 0.08 feet.
- During this IRA reporting period, sheens were observed in ENV-3MW and ENV-5MW.

Based on the weights of the spent sorbent socks, it was estimated that approximately 0.6 gallons of LNAPL were removed from wells ENV-1MW, ENV-3MW, ENV-5MW, ENV-8MW, and ENV-9MW from September 4, 2015 through June 24, 2016 using this passive recovery measure⁴.

Monthly gauging will continue to be conducted as documented in the IRA Plan; however, as noted above, sorbents are no longer being placed in the wells following gauging. If measurable LNAPL greater than 0.1 feet is encountered in any of the wells, it will be purged from the wells using a peristaltic pump, measured, and containerized for off-Site Disposal.

2.5 Status of Ongoing IRA Objectives

The following summarizes the status of the ongoing IRA objectives specified in the IRA Plan.

TABLE 2

IRA	Status
Contain/mitigate the sheen and LNAPL emanating from the Site and prevent them from travelling/migrating downstream in the Little River	Ongoing
Monitor/mitigate the LNAPL observed within groundwater monitoring wells	Ongoing
Identify the tar-like material at the pipe that appears to discharge into the Little River and attempt to identify the potential source of the material	Complete
Determine whether a potential release from the current petroleum USTs on the Site could be the source of the sheen observed in the river	Complete
Determine whether the observed contamination in the subsurface of the Site could be contributing to the observed sheen	Ongoing. Additional data will be collected in conjunction with RTN 3-32792

⁴ Estimate is based on the tare weight of the sorbent socks, the weight of the socks after removal from the wells, and an assumed specific gravity for the NAPL of 0.9.

IRA	Status
Determine whether Site conditions are present that could represent an IH and/or SRM, as defined in the MCP, associated with potential contamination in subsurface utilities at the Site	No current IH or SRM have been identified associated with the existing subsurface storm water conveyances (catch basins and piping) on Site.

3. SIGNIFICANT NEW SITE INFORMATION OR DATA

Since the submittal of IRA Status Report No. 3 on September 8, 2016, except as already described herein (**Table 2**) and below, no other significant new Site information or data have been obtained since the submittal of the IRA Plan.

From October 18 – 21, October 24 – 25, and November 1, 2016, GZA Geoenvironmental, Inc. (GZA) conducted environmental investigations on the Site on behalf of National Grid, successor to a previous owner/operator of the property. The investigations included soil vapor sampling and laboratory analysis; test boring and monitoring well installation; soil, groundwater, and LNAPL sampling and laboratory analysis. The locations of these investigations are depicted on **GZA Figure 1 (Appendix C)**. The results of these investigations have been provided to Haffner and will be incorporated into the evolving Conceptual Site Model (CSM).

4. MANAGEMENT OF REMEDIATION WASTE, REMEDIAL WASTEWATER, AND/OR REMEDIAL ADDITIVES

Remediation waste generated during completion of IRA activities during this reporting period consists of spent (used) sorbent booms and socks and personal protective equipment (PPE). Spent sorbent materials are containerized in 55-gallon drums or other suitable containers for subsequent transport and disposal at an authorized disposal facility.

On November 11, 2016, two “flex bins” of IDW, spent sorbents, and miscellaneous remediation waste generated during the installation of the semi-permanent containment boom system were transported from the Site by CHES under Uniform Hazardous Waste Manifest documentation for disposal at Clean Harbors El Dorado, LLC facility located in El Dorado, Arizona. **Appendix F** contains the signed Uniform Hazardous Waste Manifest disposal documentation.

5. OTHER INFORMATION REQUIRED BY THE MASSDEP

No other information has been required by the MassDEP associated with the IRA for RTN 3-32875.

6. LSP OPINION

It is the opinion of Eric S. Wood, LSP, that the IRA is being conducted in conformance with the IRA Plan and any conditions of approval established by the Department. **Appendix G** contains the unsigned MassDEP BWSC105 Immediate Response Action Transmittal Form for this IRA Status Report No. 4; BWSC105 will be e-signed and submitted through eDEP.

TABLES

Table 1
NAPL/Groundwater Gauging Data
May 2015 - February 2017

Haffner Realty Trust
284 Winter Street, Haverhill, Massachusetts
Ramboll Environ Project No. 08-36060C

Well	5/12/2015			8/6/2015			9/4/2015			10/2/2015			10/30/2015			12/2/2015		
	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness
MW-1	ND	3.31	ND	ND	3.56	ND	ND	3.88	ND	ND	4.00	ND	ND	4.14	ND	ND	4.23	ND
MW-2	ND	12.34	ND	ND	12.93	ND	ND	13.14	ND	ND	12.62	ND	ND	13.00	ND	ND	13.10	ND
MW-3	ND	12.14	ND	ND	12.89	ND	ND	13.22	ND	ND	12.92	ND	ND	13.18	ND	ND	13.27	ND
ENV-1MW	ND	13.45	ND	ND	13.62	ND	ND	13.70	ND	ND	13.35	ND	13.45	13.45	Sheen	ND	13.59	ND
ENV-3MW	13.52	13.54	0.02	14.14	14.36	0.22	ND	14.31	ND	ND	13.89	ND	ND	13.96	ND	ND	14.04	ND
ENV-5MW	ND	14.28	ND	15.05	15.05	Sheen	ND	15.34	ND	ND	15.01	ND	ND	15.05	ND	ND	15.07	ND
ENV-8MW	ND	14.61	ND	15.48	15.52	0.04	ND	15.81	ND	ND	15.63	ND	ND	15.69	ND	ND	15.66	ND
ENV-9MW	15.09	15.12	0.03	15.90	16.09	0.19	ND	16.20	ND	ND	16.03	ND	ND	16.04	ND	ND	16.07	ND
	Notes: NAPL = Non-Aqueous Phase Liquid All depths expressed in feet below the top of the PVC well casing. NAPL thickness expressed in feet. ND = Not Detected																	

Table 1
NAPL/Groundwater Gauging Data
May 2015 - Februaiary 2017

Haffner Realty Trust
284 Winter Street, Haverhill, Massachusetts
Ramboll Environ Project No. 08-36060C

Well	12/31/2015			1/25/2016			2/26/2016			3/29/2016			4/26/2016			5/18/2016		
	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness
MW-1	ND	3.82	ND	ND	3.78	ND	ND	2.86	ND	ND	3.08	ND	ND	3.30	ND	ND	3.50	ND
MW-2	ND	12.70	ND	ND	12.71	ND	ND	12.31	ND	ND	12.21	ND	ND	12.56	ND	ND	12.74	ND
MW-3	ND	12.94	ND	ND	12.85	ND	ND	12.50	ND	ND	12.27	ND	ND	12.45	ND	ND	12.68	ND
ENV-1MW	ND	13.30	ND	ND	13.51	ND	ND	12.44	ND	ND	12.76	ND	ND	13.51	ND	ND	13.58	ND
ENV-3MW	ND	13.60	ND	ND	13.78	ND	ND	13.10	ND	ND	13.10	ND	ND	13.71	ND	ND	13.88	ND
ENV-5MW	ND	14.64	ND	ND	15.39	ND	ND	14.25	ND	ND	14.11	ND	ND	14.46	ND	ND	14.74	ND
ENV-8MW	ND	15.29	ND	ND	15.85	ND	ND	15.00	ND	ND	14.76	ND	ND	14.90	ND	ND	15.13	ND
ENV-9MW	ND	15.72	ND	ND	14.87	ND	ND	15.40	ND	ND	15.15	ND	ND	15.34	ND	ND	15.52	ND
	Notes: NAPL = Non-Aqueous Phase Liquid All depths expressed in feet below the top of the PVC well casing. NAPL thickness expressed in feet. ND = Not Detected																	

Table 1
NAPL/Groundwater Gauging Data
May 2015 - Februaiary 2017

Haffner Realty Trust
284 Winter Street, Haverhill, Massachusetts
Ramboll Environ Project No. 08-36060C

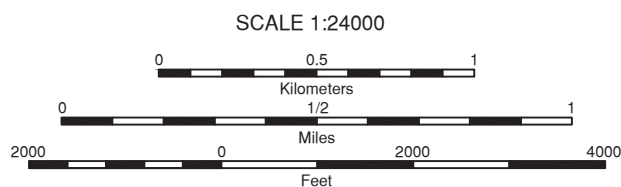
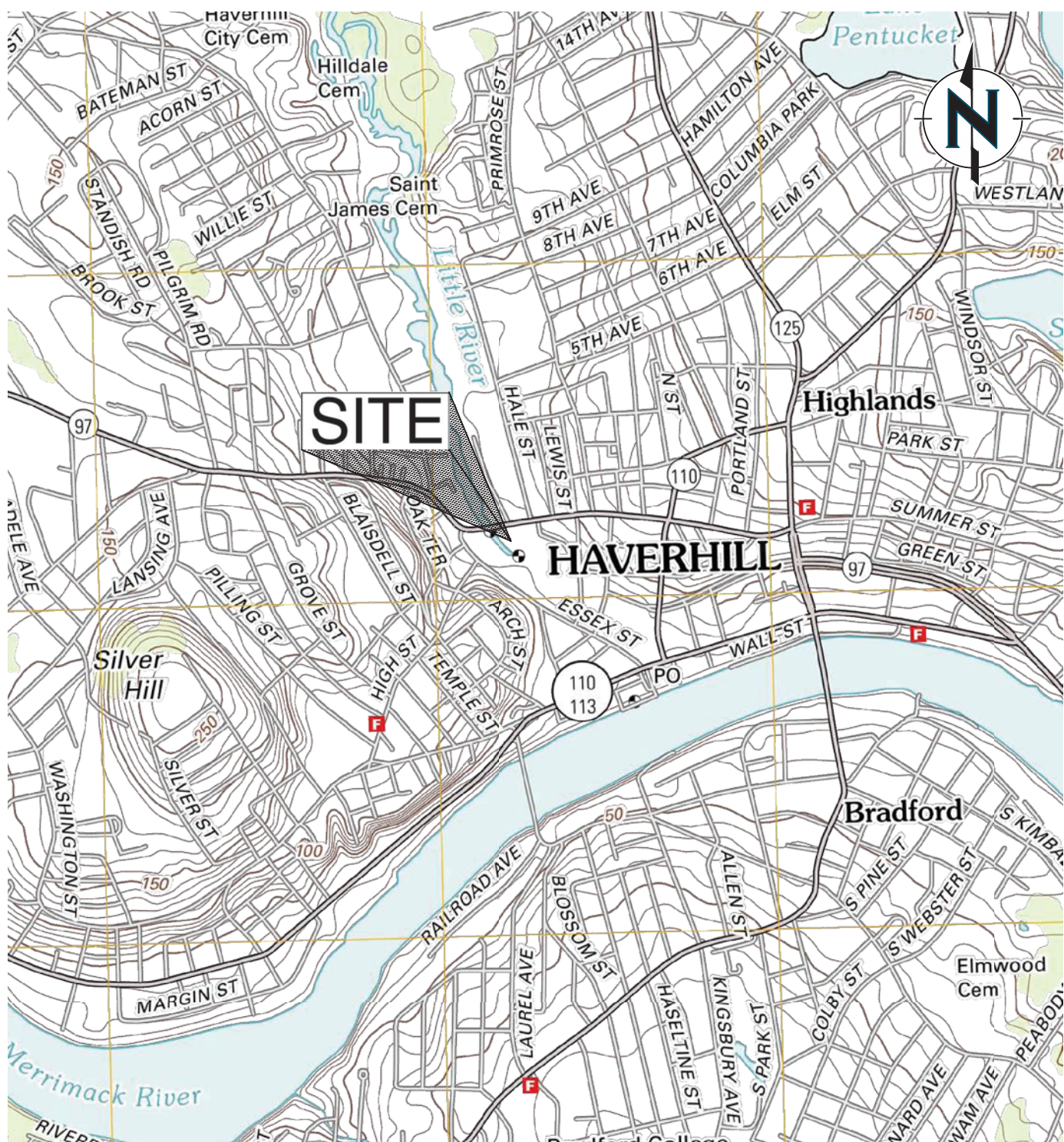
Well	6/24/2016**			7/26/2016			8/30/2016			9/27/2016			10/25/2016			11/22/2016		
	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness
MW-1	ND	3.74	ND	ND	4.04	ND	ND	4.30	ND	ND	4.48	ND	ND	3.73	ND	ND	3.48	ND
MW-2	ND	13.18	ND	ND	13.60	ND	ND	13.57	ND	ND	13.58	ND	ND	12.85	ND	ND	13.03	ND
MW-3	ND	13.17	ND	ND	13.51	ND	ND	13.45	ND	ND	13.75	ND	ND	13.38	ND	ND	13.20	ND
ENV-1MW	ND	13.75	ND	ND	13.85	ND	ND	13.89	ND	ND	13.60	ND	ND	13.46	ND	ND	13.61	ND
ENV-3MW	ND	14.32	ND	ND	14.49	ND	ND	14.59	Sheen	ND	14.51	Sheen	ND	14.04	Sheen	ND	14.08	Sheen
ENV-5MW	ND	15.30	ND	ND	15.56	ND	ND	15.64	ND	ND	15.60	ND	ND	15.37	ND	ND	15.12	Sheen
ENV-8MW	ND	15.74	ND	ND	16.11	ND	ND	16.24	ND	ND	16.22	ND	ND	15.70	ND	ND	16.64	ND
ENV-9MW	ND	16.13	ND	ND	16.51	ND	ND	16.60	ND	ND	16.53	ND	15.96	16.01	0.05	15.98	16.02	0.04
	<div>Notes: NAPL = Non-Aqueous Phase Liquid All depths expressed in feet below the top of the PVC well casing. NAPL thickness expressed in feet. ND = Not Detected</div> <div>**Sorbent socks removed from wells on June 24, 2016 and not replaced. Future LNAPL recovery will be conducted using a peristaltic pump as necessary.</div>																	

Table 1
NAPL/Groundwater Gauging Data
May 2015 - Februiriary 2017

Haffner Realty Trust
284 Winter Street, Haverhill, Massachusetts
Ramboll Environ Project No. 08-36060C

Well	12/21/2016			1/26/2017			2/24/2017		
	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness	Depth to NAPL	Depth to Water	NAPL Thickness
MW-1	ND	3.48	ND	ND	2.62	ND	ND	--	ND
MW-2	ND	12.84	ND	ND	12.3	ND	ND	12.22	ND
MW-3	ND	14.44	ND	ND	11.40	ND	ND	--	ND
ENV-1MW	ND	13.20	ND	ND	12.82	ND	ND	--	ND
ENV-3MW	ND	13.91	Sheen	ND	13.22	Sheen	ND	--	Sheen
ENV-5MW	ND	14.92	ND	ND	14.23	ND	ND	14.04	ND
ENV-8MW	ND	15.52	ND	ND	14.90	ND	ND	14.75	ND
ENV-9MW	16.01	16.03	0.02	15.38	15.39	0.01	15.23	15.31	0.08
	Notes: NAPL = Non-Aqueous Phase Liquid All depths expressed in feet below the top of the PVC well casing. NAPL thickness expressed in feet. ND = Not Detected								

FIGURES



Source: U.S. Geological Survey 7.5 minute (topographic) quadrangle; Haverhill, Massachusetts.

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RAMBOLL ENVIRON

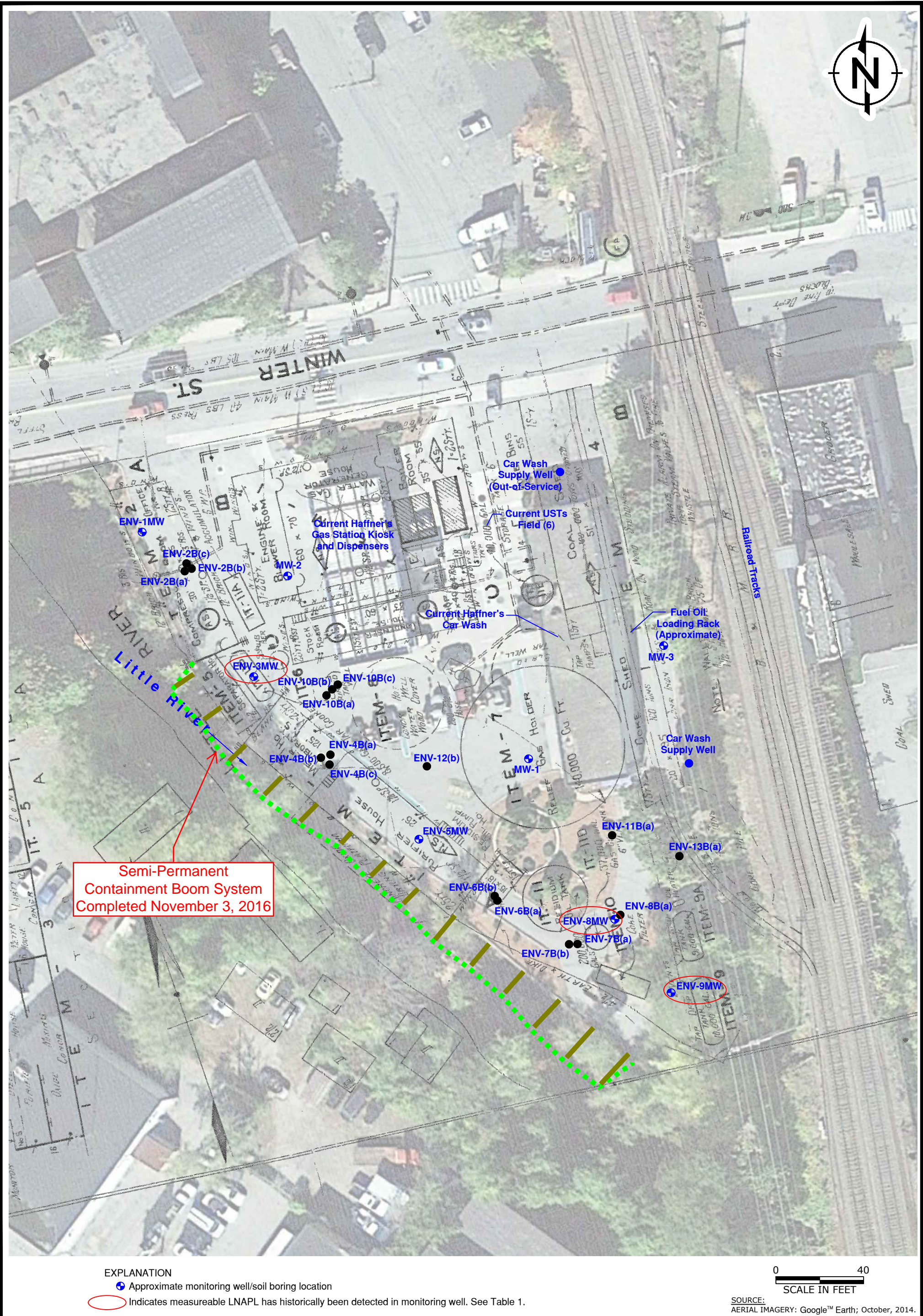
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DATE: 1/28/2015

Site Location Map
Haffner Realty Trust
284 Winter Street, Haverhill, Massachusetts

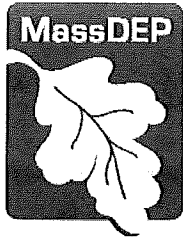
Figure
1

PROJECT: 08-36060A



APPENDIX A

MASSDEP NOTICE OF RESPONSIBILITY (NOR) FOR RTN 3-32875, DATED JUNE 3, 2015



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

JUN 03 2015

URGENT LEGAL MATTER: PROMPT ACTION NECESSARY

Haffner's Realty Trust
2 International Way
Lawrence, MA 01843

RE: Haverhill
Gasoline Station/Former MGP Site
284 Winter Street
RTN 3-32875

Attention: Joane Fournier

NOTICE OF RESPONSIBILITY; MGL c. 21E & 310 CMR 40.0000

Dear Ms. Fournier:

On May 12, 2015 at 11:44 am, the Massachusetts Department of Environmental Protection (MassDEP) received oral notification of a release/threat of release of Oil/Hazardous Material at the subject location, which requires one or more Response Actions. Based on this information, MassDEP has reason to believe that the subject property or portion(s) thereof is a disposal site as defined in the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, M.G.L. c. 21E and the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000. M.G.L. c.21E and the MCP govern the assessment and cleanup of Disposal Sites.

The purpose of this notice is to inform you of your legal responsibilities under state law for assessing and/or remediating the subject release. For purposes of this notice, the terms and phrases used herein shall have the meaning ascribed to them by the MCP unless the text clearly indicates otherwise.

STATUTORY LIABILITIES

MassDEP also has reason to believe that you (as used in this letter "you" refers to Haffner's Realty Trust) are a Potentially Responsible Party (PRP) with liability under M.G.L. c. 21E, Section

5, for Response Action Costs. Section 5 makes the following parties liable to the Commonwealth of Massachusetts: current owners or operators of a site from or at which there is or has been a release/threat of release of oil or hazardous material; any person who owned or operated a site at the time hazardous material was stored or disposed of; any person who arranged for the transport, disposal, storage or treatment of hazardous material to or at a site; any person who transported hazardous material to a transport, disposal, storage or treatment site from which there is or has been a release/threat of release of such material; and any person who otherwise caused or is legally responsible for a release/threat of release of oil or hazardous material at a site.

This liability is "strict" meaning that it is not based on fault but solely on your status as owner, operator, generator, transporter or disposer. It is also "joint and several", meaning that you may be liable for all response action costs incurred at the site, regardless of the existence of any other liable parties.

The MCP requires responsible parties to take necessary Response Actions at properties where there is or has been a release or threat of release of oil and/or hazardous material. If you do not take the necessary Response Actions, or fail to perform them in an appropriate and timely manner, MassDEP is authorized by M.G.L. c. 21E to have the work performed by its contractors. By taking such actions, you can avoid liability for Response Action Costs incurred by MassDEP and its contractors in performing these actions, and any sanctions, which may be imposed, for failure to perform Response Actions under the MCP.

You may be liable for up to three (3) times all Response Action Costs incurred by MassDEP. Response Action Costs include, without limitation, the cost of direct hours spent by MassDEP employees arranging for response actions or overseeing work performed by persons other than MassDEP or its contractors, expenses incurred by MassDEP in support of those direct hours, and payments to MassDEP's contractors. (For more detail on cost liability, see 310 CMR 40.1200.)

MassDEP may also assess interest on costs incurred at the rate of twelve percent (12%), compounded annually. To secure payment of this debt, the Commonwealth may place liens on all of your property in the Commonwealth. To recover the debt, the Commonwealth may foreclose on these liens or the Attorney General may bring legal action against you.

In addition to your liability for up to three (3) times all response action costs incurred by MassDEP, you may also be liable to the Commonwealth for damages to natural resources caused by the release. Civil and criminal liability may also be imposed under M.G.L. c. 21E, § 11, and civil administrative penalties may be imposed under M.G.L. c. 21A, § 16 for each violation of M.G.L. c. 21E, the MCP, or any order, permit or approval issued hereunder.

NECESSARY RESPONSE ACTIONS

The subject site shall not be deemed to have all the necessary and required Response Actions taken unless and until all Substantial Hazards presented by the site have been eliminated and a level of No Significant Risk exists or has been achieved in compliance with M.G.L. c. 21E and the MCP. In addition, the MCP requires persons undertaking Response Actions at Disposal Sites perform Immediate Response Actions (IRAs) in response to "sudden releases", Imminent Hazards and Substantial Release Migration. Such persons must continue to evaluate the need for IRAs and notify MassDEP immediately if such a need exists.

MassDEP has determined that an IRA is necessary to respond to a release of Oil and/or Hazardous Material at the subject site.

You are authorized to conduct only the specific response actions for which you received oral approval from MassDEP at the time oral notification was provided to MassDEP of the release of Oil and/or Hazardous Materials. All additional Immediate Response Actions require MassDEP approval in accordance with 310 CMR 40.0420.

MassDEP reminds you that IRAs must include site assessment activities necessary to evaluate potential Imminent Hazard (IH), Substantial Release Migration (SRM), and Critical Exposure Pathway (CEP) conditions. Additional Immediate Response Actions will be required in the event that one or more of these conditions are observed.

You must employ or engage a Licensed Site Professional (LSP) to manage, supervise or actually perform the necessary response actions at the subject site. In addition, the MCP requires persons undertaking response actions at a disposal site submit to MassDEP a Permanent Solution Statement prepared by an LSP in accordance with 310 CMR 40.1000 upon determining that a level of No Significant Risk already exists or has been achieved at a disposal site or portion thereof. [You may obtain a list of the names and addresses of these licensed professionals from the Board of Registration of Hazardous Waste Site Cleanup Professionals at <http://www.mass.gov/eea/agencies/lsp/> or (617) 556-1091.]

There are several other submittals required by the MCP which are related to release notification and/or Response Actions that may be conducted at the subject site in addition to a Permanent Solution Statement that, unless otherwise specified by MassDEP, must be provided to MassDEP within specific regulatory timeframes. The submittals are as follows:

- (1) If information is obtained after making an oral or written notification to indicate that the release or threat of release didn't occur, failed to meet the reporting criteria at 310 CMR 40.0311 through 40.0315, or is exempt from notification pursuant to 310 CMR 40.0317, a Notification Retraction may be submitted within 60 days of initial notification pursuant to 310 CMR 40.0335;
- (2) If a Notification Retraction has not been submitted, a Release Notification Form (RNF) must be submitted to MassDEP pursuant to section 310 CMR 40.0333 within 60 calendar

days of the initial date of oral notification to MassDEP of a release pursuant to 310 CMR 40.0300 or from the date MassDEP issues a Notice of Responsibility (NOR), whichever occurs earlier. The RNF can either be submitted electronically or using the PDF Form at <http://www.mass.gov/eea/docs/dep/cleanup/approvals/bwsc-103.pdf> ;

- (3) Unless a Permanent Solution Statement or Downgradient Property Status Submittal is provided to MassDEP earlier, an Immediate Response Action (IRA) Plan prepared in accordance with 310 CMR 40.0420, or an IRA Completion Statement (310 CMR 40.0427) must be submitted to MassDEP within 60 calendar days of the initial date of oral notification to MassDEP of a release pursuant to 310 CMR 40.0300 or from the date MassDEP issues an NOR, whichever occurs earlier; and
- (4) Unless a Permanent Solution Statement or Downgradient Property Status Submittal is provided to MassDEP earlier, a completed Tier Classification Submittal pursuant to 310 CMR 40.0510 must be submitted within one year of the initial date of notification of a release pursuant to 310 CMR 40.0300 or from the date MassDEP issues an NOR, whichever occurs earlier or as otherwise specified by the Department in an Interim Deadline or order issued pursuant to 310 CMR 40.0501 (2).
- (5) Pursuant to MassDEP's "Timely Action Schedule and Fee Provisions", 310 CMR 4.00, the appropriate fee must be included with a Permanent Solution Statement that is submitted to MassDEP more than 120 calendar days after the initial date of oral notification to MassDEP of a release pursuant to 310 CMR 40.0300, or more than 120 calendar days after the date MassDEP issues an NOR, whichever occurs earlier, and before Tier Classification. A fee is not required for a Permanent Solution Statement submitted to MassDEP within 120 days of the date of oral notification to MassDEP, or within 120 days of the date MassDEP issues an NOR, whichever date occurs earlier, or after Tier Classification.

It is important to note that you must dispose of any Remediation Waste generated at the subject location in accordance with 310 CMR 40.0030 including, without limitation, contaminated soil and/or debris. Any Bill of Lading accompanying such waste must bear the seal and signature of an LSP or, if the response action is performed under the direct supervision of MassDEP, the signature of an authorized representative of MassDEP.

MassDEP encourages parties with liability under M.G.L. c. 21E to take prompt action in response to releases and threats of release of oil and/or hazardous material. By taking prompt action, you may significantly lower your assessment and cleanup costs and avoid the imposition of, or reduce the amount of, certain annual compliance fees for response actions payable under 310 CMR 4.00.

If you have any questions relative to this notice, you should contact the undersigned at the letterhead address or (978) 694-3386. All future communications regarding this release must reference the Release Tracking Number **(RTN) 3-32875** contained in the subject block of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Ida Babroudi". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ida Babroudi
Environmental Engineer
Bureau of Waste Site Cleanup
MassDEP, Northeast Regional Office

cc: Board of Health, City of **Haverhill**, Ms. Donna A. Leone
"via electronic submittal", bdufresne@cityofhaverhill.com

MassDEP data entry/file (NOR / Issued)

APPENDIX B

**MASSDEP EMERGENCY AUTHORIZATION PURSUANT TO
MASSACHUSETTS WATERWAYS REGULATIONS 310 CMR 9.20, DATED
OCTOBER 19, 2016**



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

October 19, 2016

Ramboll Environ
c/o John Noble
3 Carlisle Road, Suite 210
Westford, MA 01886

RE: Emergency Authorization pursuant to Waterways Regulations 310 CMR 9.20
Haffner Realty Trust, 284 Winter Street
Waters of the Little River, Haverhill, Essex County

Dear Mr. Noble:

In response to your letter dated October 4, 2015, submitted on behalf of Haffner Realty Trust, wherein you requested approval pursuant to the Emergency Action provision of the Waterways Regulation at 310 CMR 9.20 to install a semi-permanent pile-held containment boom system in waters of the Little River to contain the escapement of contamination leaching into said waterway from 284 Winter Street in Haverhill, Essex County.

The Department of Environmental Protection Waterways Regulation Program has reviewed your proposal as well as the Order of Conditions (DEP File #33-1387) issued by the Haverhill Conservation Commission on June 15, 2016 and the letter from the Department of Environmental Protection's Northeast Regional Office's Bureau of Waste Site Cleanup (BWSC) dated October 3, 2016. The BWSC stated that they are currently overseeing the remediation of the subject property pursuant Release Tracking Number (RTN) 3-0032875 and Immediate Response Actions (IRA) as defined in the Massachusetts Contingency Plan (MCP) to address a continuing release of petroleum and coal tar leaching from the site into the Little River in Haverhill. As a result, the BWSC is requiring Haffner Realty Trust to install a semi-permanent containment boom as soon as possible to contain and abate a time-critical release of contamination into waters of the Commonwealth until such time that a permanent solution under the MCP is achieved at the site. Therefore, in order to comply with the MCP IRA and eliminate or mitigate this threat to public health, safety, and the environment, Emergency Authorization is hereby granted pursuant to 310 CMR 9.20 to Haffner Realty Trust to install said semi-permanent

pile held containment boom system in accordance with the locations shown and details indicated on the accompanying plan Sheet C-1 titled "284 Winter Street, Haverhill, MA, Site Plan" prepared by Allen & Major Associates, Inc., dated March 10, 2016; plan Figure 1 titled "Haffner's Realty Trust, 284 Winter Street, Haverhill, MA, Site Sketch" prepared by Clean Harbors Environmental Services, dated March 10, 2016; and in full compliance with Order of Conditions (DEP File #33-1387) issued by the Haverhill Conservation Commission on June 15, 2016.

This authorization does not relieve the Applicant of its obligation to obtain all other applicable Local, State and/or Federal authorizations prior to the commencement of the activity authorized herein. Furthermore, pursuant to 310 CMR 9.20(3), all work authorized herein shall be completed within 30 calendar days of the date of this authorization, unless a written extension is approved by the Department.

Under this Emergency Authorization you are required to file a properly completed Waterways License Application within thirty (30) days of the date of this emergency authorization unless a written extension is approved by the Department. The Department reserves the right to require modifications to the project to ensure full compliance with the applicable provisions of M.G.L. Chapter 91 and its regulations at 310 CMR 9.00.

Should you have any questions concerning this matter, please contact Frank Taormina in the Waterways Regulation Program at (617) 292-5551 or at frank.taormina@state.ms.us.

Sincerely,



Ben Lynch
Section Chief
Waterways Regulation Program

Cc: Haverhill Conservation Commission (DEP File #33-1387)
MassDEP NERO/BWSC (RTN #3-0032875)

APPENDIX C

CHES FIGURE 1 - SITE SKETCH

GZA FIGURE 1 - EXPLORATION LOCATION PLAN

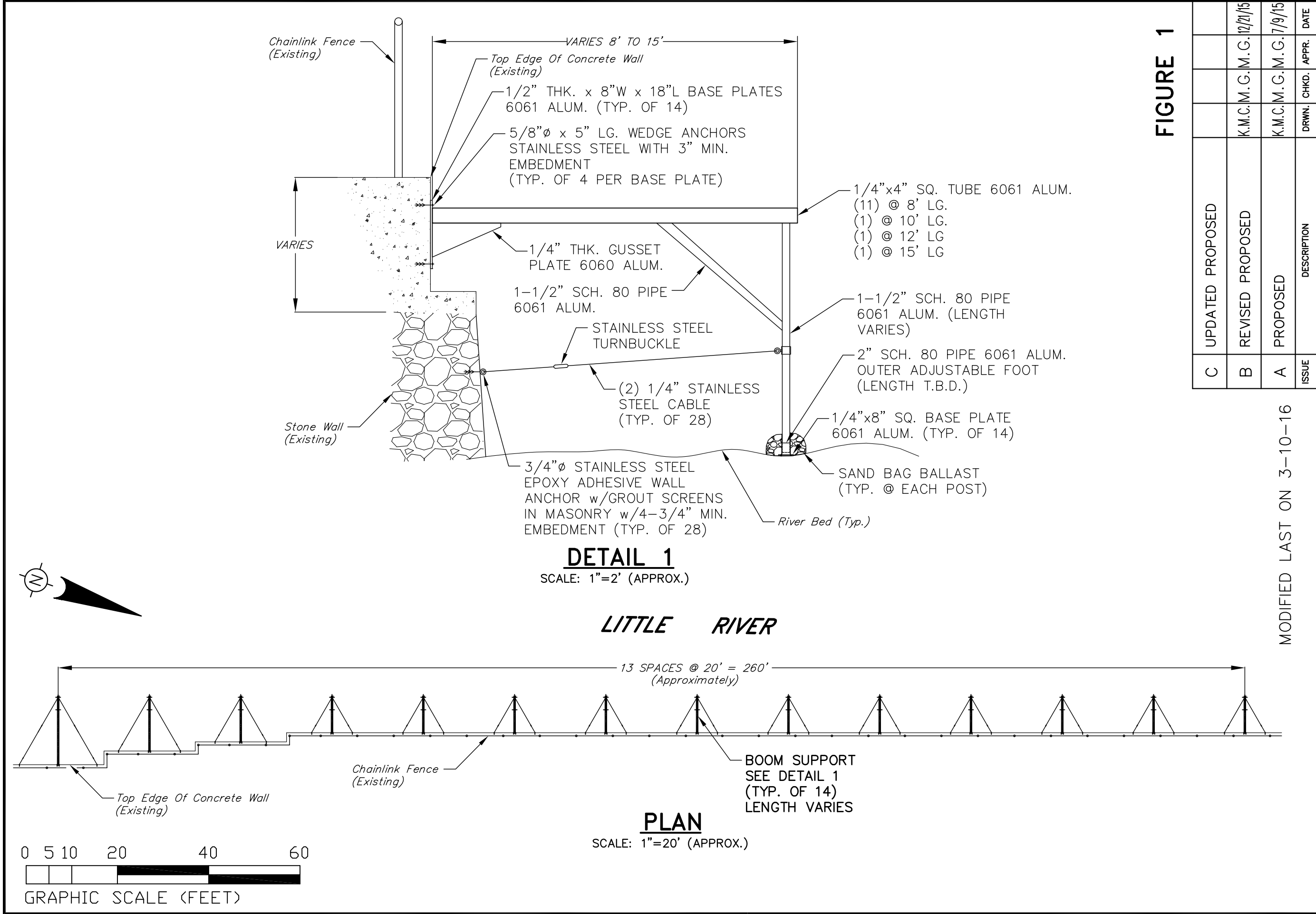


FIGURE 1

ISSUE	DESCRIPTION	DRWN.	CHKD.	APPR.	DATE
C	UPDATED PROPOSED				
B	REVISED PROPOSED	K.M.C.M.G.	M.G.		12/21/15
A	PROPOSED	K.M.C.M.G.	M.G.		7/9/15

MODIFIED LAST ON 3-10-16



CleanHarbors
ENVIRONMENTAL SERVICES
REMEDIATION INVESTIGATIONS
42 Longwater Drive
Norwell, Massachusetts 02061
Telephone (781) 792-5000

HAFFNER'S REALTY TRUST
284 WINTER STREET
HAVERHILL, MASSACHUSETTS

SITE SKETCH

PROJECT NO. SB1403704706
SCALE AS NOTED

DWG. NO. **SB1403704706-C-01**



LEGEND

NFAA-01

NFSB-05

NFCB-01

NFSB-01 (MW)

NFNP-01

NFSV-01

AMBIENT AIR SAMPLE

SOIL BORING

CATCH BASIN SEDIMENT SAMPLE

MONITORING WELL

NAPL SAMPLE

SOIL VAPOR SAMPLE

L3 ASSESSORS PARCEL DATA

SOURCE

1) THIS MAP CONTAINS THE ESRI ArcGIS ONLINE BING MAPS AERIAL LAYER PACKAGE, PUBLISHED DECEMBER 1, 2010 BY ESRI ARCS SERVICES AND UPDATED MONTHLY. THIS SERVICE USES UNIFORM NATIONALLY RECOGNIZED DATUM AND CARTOGRAPHY STANDARDS AND A VARIETY OF AVAILABLE SOURCES FROM SEVERAL DATA PROVIDERS.

2) THE LOCATION AND ELEVATIONS OF THE BORINGS, CORINGS, TEST PITS, SAMPLING LOCATIONS, SELECTED SITE FEATURES, EXPLORATIONS WERE APPROXIMATELY DETERMINED BY SURVEY, GPS, TAPE MEASUREMENTS, LINE OF SIGHT, PACING, LEVEL SURVEY FROM EXISTING TOPOGRAPHIC AND MAN-MADE FEATURES. THIS DATA SHOULD BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD USED.

02550100

SCALE IN FEET

UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, 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.

ENVIRONMENTAL REVIEW

284 WINTER STREET

HAVERHILL, MASSACHUSETTS

EXPLORATION LOCATION PLAN

PREPARED BY:

GZA

GeoEnvironmental, Inc.

Engineers and Scientists

www.gza.com

PREPARED FOR:

nationalgrid

PROJ MGR: JRC

DESIGNED BY: JRC

DATE: 11/10/2016

REVIEWED BY: CAL

DRAWN BY: SMW

PROJECT NO. 01.0172397.00

CHECKED BY: JRC

SCALE: 1" = 50 FEET

REVISION NO.

FIGURE

1

© 2016 - GZA GeoEnvironmental, Inc. J:\170,000-179,999\172397\172397-00_JRC\Figures\GIS\MXD\172397_explorationLocation.mxd, 11/10/2016, 3:22:33 PM, stephen.washburn

APPENDIX D

SEMI-PERMANENT CONTAINMENT BOOM CONSTRUCTION-PERIOD STATUS REPORTS 1 AND 2

FIELD STATUS REPORT	
DATE:	October 28, 2016
DATES of WORK:	October 12, 2016, October 24-27, 2016
STATUS REPORT NO.:	01
FILE NO.:	08-36060G/US07
PROJECT:	Haffner's Containment Boom Installation, 284 Winter Street, Haverhill MA
CONTRACTOR(S):	Valley Tree Service (Valley Tree) and Clean Harbors Environmental Services, Inc. (CHES)
ATTACHMENTS:	Photographic Log, CHES Site Sketch
Erosion Control Description	Per Rob Moore, Haverhill Conservation Agent, at the project pre-construction kick-off meeting on October 4, 2016, coir logs lining the parking lot and silt sacks in the catch basins were deemed not to be necessary as the project will not involve excavation or potential impacts to the quality of stormwater runoff coming into contact with staged project materials. During the project pre-construction kick-off meeting on October 4, 2016, the following measures were agreed upon to control potential impacts to stormwater runoff: spill control/spill kits are to be maintained in the work area to address potential spills from construction equipment; and refueling of construction equipment will not be conducted near catch basins or in unpaved areas.
Project Status	On October 12, 2016, trees and woody vegetation were cleared off the retaining wall by Valley Tree in accordance with the Invasive Plant Management Strategy (IPMS). Installation of the containment boom supports was initiated on October 24, 2016. As of October 27, 2016, all 14 containment boom supports had been affixed to the retaining wall; tie-off ropes for the curtain boom had been affixed to the supports; guy wires had been installed on 10 of the 14 supports; and gravel ballast bags were placed on the bearing plates of several boom supports with the remaining bags staged in the equipment staging area. Completion of the boom installation is anticipated by November 3, 2016 pending weather and river stage conditions.
Equipment	Valley Tree: 40 Ton Crane, 70-foot aerial lift, Wood chipper and enclosed chip trailer, Log truck, Chain saws and hand tools CHES: Sunbelt Rentals extension boom aerial lift, Bobcat mini-excavator, support/supply trucks, generator, power tools, and hand tools
Activities	October 12, 2016 - Valley Tree removed woody vegetation (i.e., trees and shrubs) from the retaining wall. Vegetation (including invasive plant species) which was immediately chipped into an enclosed trailer for off-site disposal at an incinerator. October 24, 2016 – CHES mobilized equipment to the site and installed four of 14 boom supports, starting at the southern end of the retaining wall. CHES re-tied the northern end of the temporary sorbent boom at the northern end of the wall that had been damaged during heavy rain on 10/21/2016. October 25, 2016 – CHES replaced four torn sections of the temporary sorbent booms and installed 8 boom supports. Spent sorbent booms were placed in 55-gallon drums pending off-site disposal. October 26, 2016 – CHES installed the remaining two boom supports (total of 14), installed sorbent boom tie-off ropes, constructed boom support guy wire assemblies and affixed guy wires to two boom supports. October 27, 2016 – CHES constructed the boom support guy wire assemblies and affixed guy wires to eight boom supports. In addition, gravel ballast bags were assembled for stabilization of boom support bearing plates. Gravel bags (2 per support) were installed on several boom supports with the remaining staged in the designated equipment staging area.
Others On Site	Julie Rupp/Ramboll Environ (10/12, 10/24-10/27), Tim Boyle/MassDEP (10/25 & 10/26), Rob Huening/Ramboll Environ (10/24 & 10/25), John Noble/Ramboll Environ (10/24 & 10/26)
Corrective Actions	No corrective actions were necessary regarding the IPMS or Pollution Prevention and Erosion Control Plan. On October 24 and 25, 2016 CHES, replaced four sections and repaired the temporary sorbent boom that were damaged due to heavy rain on Friday 10/21/2016.
PREPARED BY:	Julie Rupp/Environmental Monitor (Ramboll Environ)
REVIEWED BY:	John Noble, P.G. (Ramboll Environ)



Photo 1: Retaining wall and temporary sorbent boom prior to vegetation clearing



Photo 2: Retaining wall and temporary sorbent boom after vegetation clearing (10/12/2016)



Photo 3: Containment boom supports installed on the first day of construction (10/24/2016)



Photo 4: Containment Boom supports constructed on day 2 (10/25/2016) and work beginning on day 3 (10/26/2016), new temporary sorbent boom sections are pictured near the center of the photo



Photo 5: Attachment of containment boom ropes and support guy wires on day 3 (10/26/2016)



Photo 6: Attachment of containment boom guy wires on day 4 (10/27/2016)

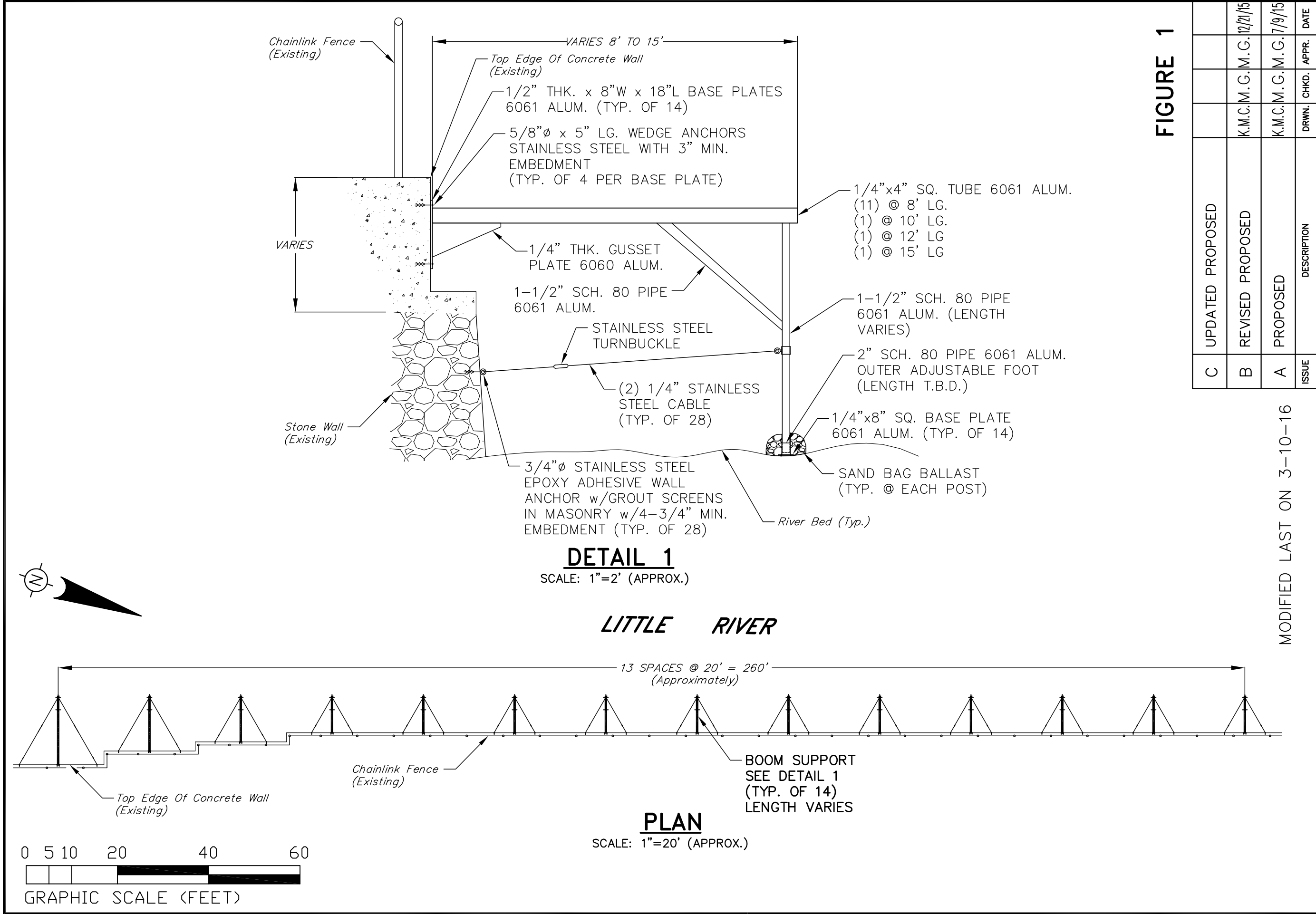


FIGURE 1

ISSUE	DESCRIPTION	DRWN.	CHKD.	APPR.	DATE
C	UPDATED PROPOSED				
B	REVISED PROPOSED	K.M.C.M.G.	M.G.		12/21/15
A	PROPOSED	K.M.C.M.G.	M.G.		7/9/15

MODIFIED LAST ON 3-10-16



CleanHarbors
ENVIRONMENTAL SERVICES
REMEDIATION INVESTIGATIONS
42 Longwater Drive
Norwell, Massachusetts 02061
Telephone (781) 792-5000

HAFFNER'S REALTY TRUST
284 WINTER STREET
HAVERHILL, MASSACHUSETTS

SITE SKETCH

PROJECT NO. SB1403704706
SCALE AS NOTED

DWG. NO. **SB1403704706-C-01**

FIELD STATUS REPORT	
DATE:	November 8, 2016
DATES of WORK:	November 1 – November 3, 2016
STATUS REPORT NO.:	02 (Final)
MassDEP FILE NO.:	33-1387
PROJECT:	Haffner's Containment Boom Installation, 284 Winter Street, Haverhill MA
CONTRACTOR(S):	Clean Harbors Environmental Services, Inc. (CHES)
ATTACHMENTS:	Photographic Log, CHES Site Sketch
Erosion Control Description	Per Rob Moore, Haverhill Conservation Agent, at the project pre-construction kick-off meeting on October 4, 2016, coir logs lining the parking lot and silt sacks in the catch basins were deemed not to be necessary as the project will not involve excavation or potential impacts to the quality of stormwater runoff coming into contact with staged project materials. During the project pre-construction kick-off meeting on October 4, 2016, the following measures were agreed upon to control potential impacts to stormwater runoff: spill control/spill kits are to be maintained in the work area to address potential spills from construction equipment; and refueling of construction equipment will not be conducted near catch basins or in unpaved areas. In addition, coir logs were staged at the site and were available for deployment if necessary.
Project Status	Due to safety concerns posed by high flows in the Little River, no work occurred on 10/28 or 10/31/16. All 14 containment boom supports and associated guy wires (two per support) have been affixed to the retaining wall; the curtain boom (orange) was connected to the support system by adjustable metal rings and tie-off ropes. Tie-off ropes were knotted to eye bolts drilled into the top of the concrete retaining wall for ready access. New sorbent boom was installed and affixed to the curtain boom. Sorbent boom was extended beyond the curtain boom and support structure to the south of the retaining wall and was tied off to a timber wall south of the masonry retaining wall. Gravel bags (2 per support) were placed on the boom support bearing plates. Spent sorbents were removed from the Little River and containerized on site in "flex bins" pending off-site disposal.
Equipment	CHES: Bobcat mini-excavator (on-site, not used), support/supply trucks, generator, power tools, and hand tools
Activities	<p>November 1, 2016 – CHES installed the remaining guy wires on the last four boom supports (total of 8 guy wires) and remaining gravel bags (2 per support) were placed on the boom support bearing plates.</p> <p>November 2, 2016 – CHES installed the two I-beams outside the first and 14th boom support to connect the containment boom to the wall via bulkhead risers. Only the northern bulkhead riser was installed (see below). The curtain boom was attached to the metal rings and tie-off ropes and the sorbent boom was installed.</p> <p>November 3, 2016 – CHES removed the spent sorbent boom (>300 feet) which was placed in two flex-bins pending off-site disposal. Eye bolts were installed at the top of the concrete retaining wall and the boom tie-off ropes were knotted in place. CHES repaired a damaged section of curb, restored site landscaping (e.g., raking disturbed mulch), and removed equipment and refuse associated with the project. HCC representative Robert Moore visited the site for an inspection and no concerns were noted.</p>
Stormwater BMP Inspection Results	At the completion of boom construction, the Environmental Monitor inspected all aspects of stormwater BMPs as required by the Order of Conditions (OOC) issued by Haverhill Conservation Commission (HCC) on June 15, 2016. No deficiencies or wear to stormwater BMPs were noted.
Others On Site	Julie Rupp/Ramboll Environ (11/1 – 11/3), Tim Boyle/MassDEP (11/2), Rob Huening/Ramboll Environ (11/1 & 11/2), John Noble/Ramboll Environ (11/1 & 11/3), Rob Moore/Haverhill Conservation Commission (11/3)
Corrective Actions	The northern bulkhead riser was installed as intended. Although not originally proposed, it was decided to install a bulkhead riser at the southern terminus of the containment boom as well. The southern bulkhead riser was ordered on 11/3 which will be installed after receipt. No additional corrective actions were necessary.
PREPARED BY:	Julie Rupp/Environmental Monitor (Ramboll Environ)
REVIEWED BY:	John Noble, P.G. (Ramboll Environ)



Photo 1: Northern containment boom supports prior to guy wire installation.



Photo 2: Guy wire installation complete for all supports. Temporary sorbent boom pending replacement.



Photo 3: Curtain boom and new sorbent boom installed. Spent temporary sorbent boom shown pending removal.



Photo 4: Gravel ballast bags to be placed on boom support bearing plates.



Photo 5: View of southern/downstream end of the boom containment system. Temporary sorbent boom extends beyond the retaining wall and boom supports to the south.



Photo 6: View of the completed boom installation facing north/upstream.

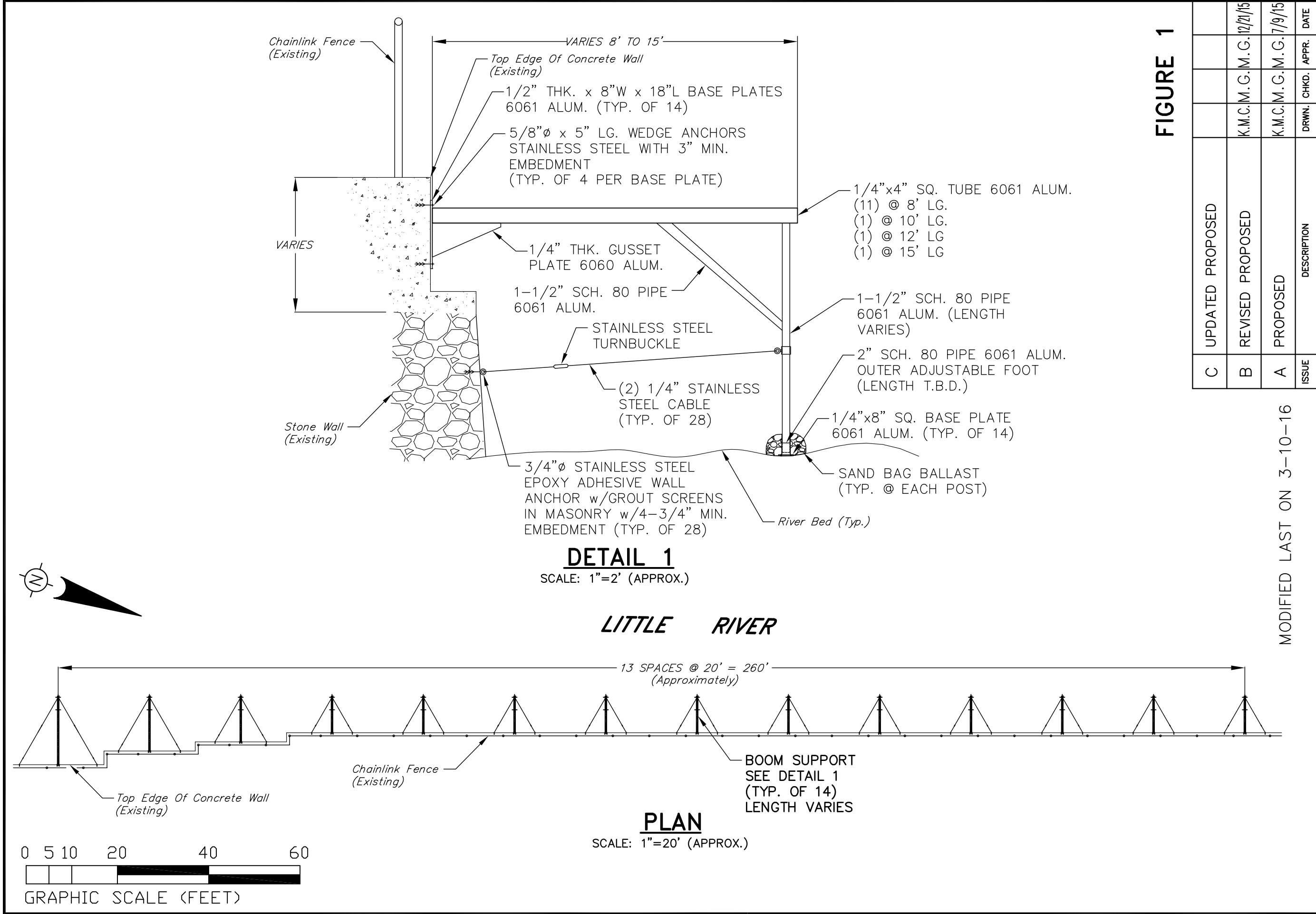


FIGURE 1

ISSUE	DESCRIPTION	DRWN.	CHKD.	APPR.	DATE
C	UPDATED PROPOSED				
B	REVISED PROPOSED	K.M.C.M.G.	M.G.		12/21/15
A	PROPOSED	K.M.C.M.G.	M.G.		7/9/15

MODIFIED LAST ON 3-10-16



CleanHarbors
ENVIRONMENTAL SERVICES
REMEDIATION INVESTIGATIONS
42 Longwater Drive
Norwell, Massachusetts 02061
Telephone (781) 792-5000

HAFFNER'S REALTY TRUST
284 WINTER STREET
HAVERHILL, MASSACHUSETTS

SITE SKETCH

PROJECT NO. SB1403704706
SCALE AS NOTED

DWG. NO. **SB1403704706-C-01**

APPENDIX E

IRA STATUS REPORT NO. 4 PHOTOLOG



Photo 1: Temporary containment boom on the Little River looking upstream (north). Photo taken 9/27/16



Photo 2: Temporary containment boom on the Little River during construction of semi-permanent containment boom system. NAPL sampling shown being performed by GZA. Photo taken 11/1/16



Photo 3: Semi-permanent containment boom on the Little River looking downstream (south).
Photo taken 11/22/16



Photo 4: Semi-permanent containment boom on the Little River looking upstream (north). Photo taken 12/21/16



Photo 5: Southern end of semi-permanent containment boom on the Little River looking downstream (south). Photo taken 12/21/16



Photo 6: Semi-permanent containment boom on the Little River looking upstream (north). Photo taken 1/26/17



Photo 7: Semi-permanent containment boom on the Little River looking upstream (north). Photo taken 2/27/17



Photo 8: Southern end of semi-permanent containment boom on the Little River, looking downstream (south). Fallen tree visible on temporary boom "tail". Photo taken 2/24/17

APPENDIX F

IDW AND SPENT SORBENT DISPOSAL DOCUMENTATION

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MP9783735855	2. Page 1 of 1	3. Emergency Response Phone (800) 483-3718	4. Manifest Tracking Number 003393701 FLE		
5. Generator's Name and Mailing Address Hanner Realty Trust 284 Winter Street Haverhill, MA 01830 Generator's Phone: (978) 373-5855			Generator's Site Address (if different than mailing address) SAME				
6. Transporter 1 Company Name Clean Harbors Environmental Service, Inc.			U.S. EPA ID Number MAD039322250				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address Clean Harbors El Dorado LLC 309 American Circle El Dorado, AR 71730 Facility's Phone: (870) 863-7173			U.S. EPA ID Number ARD069748192				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		UN3175, WASTE SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S., (BENZENE), 4.1, PG II	02 CF		500	P	0001 0018
14. Special Handling Instructions and Additional Information 1. CH1068847 ERG#133 2 Flexbins							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name PHILIP CLOUGH		Signature Philip M Clough		Month Day Year 11 15 16			
INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name Shawn Giles		Signature Shawn Giles		Month Day Year 11 15 16		
	Transporter 2 Printed/Typed Name		Signature		Month Day Year		
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator)				U.S. EPA ID Number		
	Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator)						
	Month Day Year						
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1. H040		2.		3.		4.
	20. Designated Facility, Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
	Printed/Typed Name Charleeka Thompson		Signature Charleeka Thompson		Month Day Year 11 15 16		



Land Disposal Restriction
Notification Form

Page : 1 of 1

Printed Date : Nov 12, 2016

MANIFEST INFORMATION

Generator : Haffner Realty Trust

Address: 284 Winter Street
Haverhill, MA 01830

EPA ID #: MP9783735855

Manifest Tracking Info.

003393701FLE

Sales Order No: 1603049136-007

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	CH1068847	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

D018

EPA Waste SubCategory

High TOC Ignitable Liquids

NONE

Certification

Applies to
Manifest Line
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1.

Waste analysis data, where available, is attached.

Signature :

Philip Clough

Print Name

PHILIP CLOUGH

Title :

MGR.

Date :

11-15-16

APPENDIX G

MASSDEP BWSC105 IMMEDIATE RESPONSE ACTION TRANSMITTAL FORM



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 105

Immediate Response Action (IRA) Transmittal Form

Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 32792

A. SITE LOCATION:

1. Release Name/Location Aid: HAFFNER'S
2. Street Address: 284 WINTER STREET
3. City/Town: HAVERHILL 4. Zip Code: 018300000
- ☐ 5. Check here if this location is Adequately Regulated, pursuant to 310 CMR 40.0110-0114.
- ☐ a. CERCLA ☐ b. HSWA Corrective Action ☐ c. Solid Waste Management
- ☐ d. RCRA State Program (21C Facilities)

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

1. List Submittal Date of Initial IRA Written Plan (if previously submitted): _____
- ☐ 2. Submit an **Initial IRA Plan**.
- ☐ 3. Submit a **Modified IRA Plan** of a previously submitted written IRA Plan.
- ☐ 4. Submit an **Imminent Hazard Evaluation**. (check one)
- ☐ a. An Imminent Hazard exists in connection with this Release or Threat of Release.
- ☐ b. An Imminent Hazard does not exist in connection with this Release or Threat of Release.
- ☐ c. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release, and further assessment activities will be undertaken.
- ☐ d. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release. However, response actions will address those conditions that could pose an Imminent Hazard.
- ☐ 5. Submit a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard**.
- ☒ 6. Submit an **IRA Status Report**
- ☐ 7. Submit a **Remedial Monitoring Report**. (This report can only be submitted through eDEP.)
- a. Type of Report: (check one) ☐ i. Initial Report ☐ ii. Interim Report ☐ iii. Final Report
- b. Frequency of Submittal: (check all that apply)
- ☐ i. A Remedial Monitoring Report(s) submitted monthly to address an Imminent Hazard.
- ☐ ii. A Remedial Monitoring Report(s) submitted monthly to address a Condition of Substantial Release Migration.
- ☐ iii. A Remedial Monitoring Report(s) submitted every six months, concurrent with an IRA Status Report.
- ☐ iv. A Remedial Monitoring Report(s) submitted annually, concurrent with an IRA Status Report.
- c. Number of Remedial Systems and/or Monitoring Programs: _____

A separate BWSC105A, IRA Remedial Monitoring Report, must be filled out for each Remedial System and/or Monitoring Program addressed by this transmittal form.



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☐ 8. Submit an **IRA Completion Statement**.

☐ a. Check here if future response actions addressing this Release or Threat of Release notification condition will be conducted as part of the Response Actions planned or ongoing at a Site that has already been Tier Classified under a different Release Tracking Number (RTN)

b. Provide Release Tracking Number of Tier Classified Site (Primary RTN): _____

These additional response actions must occur according to the deadlines applicable to the Primary RTN. Use the Primary RTN when making all future submittals for the site unless specifically relating to this Immediate Response Action.

☐ 9. Submit a **Revised IRA Completion Statement**.

☐ 10. Submit a **Plan for the Application of Remedial Additives** near a sensitive receptor, pursuant to 310 CMR 40.0046(3).

(All sections of this transmittal form must be filled out unless otherwise noted above)

C. RELEASE OR THREAT OF RELEASE CONDITIONS THAT WARRANT IRA:

1. Media Impacted and Receptors Affected: (check all that apply)

- | | | |
|----------------------------------------------------|------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> a. Paved Surface | <input type="checkbox"/> b. Basement | <input type="checkbox"/> c. School |
| <input type="checkbox"/> d. Public Water Supply | <input checked="" type="checkbox"/> e. Surface Water | <input type="checkbox"/> f. Zone 2 |
| <input type="checkbox"/> g. Private Well | <input type="checkbox"/> h. Residence | <input checked="" type="checkbox"/> i. Soil |
| <input checked="" type="checkbox"/> j. Groundwater | <input checked="" type="checkbox"/> k. Sediments | <input type="checkbox"/> l. Wetland |
| <input type="checkbox"/> m. Storm Drain | <input type="checkbox"/> n. Indoor Air | <input type="checkbox"/> o. Air |
| <input type="checkbox"/> p. Soil Gas | <input type="checkbox"/> q. Sub-Slab Soil Gas | <input type="checkbox"/> r. Critical Exposure Pathway |
| <input checked="" type="checkbox"/> s. NAPL | <input type="checkbox"/> t. Unknown | |
| <input type="checkbox"/> r. Others | Specify: _____ | |

2. Sources of the Release or TOR: (check all that apply)

- | | | |
|------------------------------------------------|---------------------------------------------------------------------|-----------------------------------|
| <input type="checkbox"/> a. Transformer | <input type="checkbox"/> b. Fuel Tank | <input type="checkbox"/> c. Pipe |
| <input type="checkbox"/> d. OHM Delivery | <input type="checkbox"/> e. AST | <input type="checkbox"/> f. Drums |
| <input type="checkbox"/> g. Tanker Truck | <input type="checkbox"/> h. Hose | <input type="checkbox"/> i. Line |
| <input type="checkbox"/> j. UST | Describe: _____ | |
| <input type="checkbox"/> k. Vehicle | <input type="checkbox"/> l. Boat/Vessel | |
| <input checked="" type="checkbox"/> m. Unknown | <input checked="" type="checkbox"/> n. Other: FORMER MGP OPERATIONS | |

3. Type of Release or TOR: (check all that apply)

- | | | | |
|------------------------------------------|---------------------------------------------------------------------|-----------------------------------------|--------------------------------------|
| <input type="checkbox"/> a. Dumping | <input type="checkbox"/> b. Fire | <input type="checkbox"/> c. AST Removal | <input type="checkbox"/> d. Overfill |
| <input type="checkbox"/> e. Rupture | <input type="checkbox"/> f. Vehicle Accident | <input type="checkbox"/> g. Leak | <input type="checkbox"/> h. Spill |
| <input type="checkbox"/> i. Test failure | <input type="checkbox"/> j. TOR Only | | |
| <input type="checkbox"/> k. UST Removal | Describe: _____ | | |
| <input type="checkbox"/> l. Unknown | <input checked="" type="checkbox"/> m. Other: FORMER MGP OPERATIONS | | |

4. Identify Oils and Hazardous Materials Released: (check all that apply)

- | | |
|---------------------------------------------|--------------------------------------------------|
| <input checked="" type="checkbox"/> a. Oils | <input type="checkbox"/> b. Chlorinated Solvents |
| <input type="checkbox"/> c. Heavy Metals | <input checked="" type="checkbox"/> d. Others |
| Specify: TARLIKE MATERIAL, MGP WASTE | |

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply, for volumes list cumulative amounts)

- | | |
|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| <input type="checkbox"/> 1. Assessment and/or Monitoring Only | <input type="checkbox"/> 2. Temporary Covers or Caps |
| <input checked="" type="checkbox"/> 3. Deployment of Absorbent or Containment Materials | <input type="checkbox"/> 4. Temporary Water Supplies |
| <input type="checkbox"/> 5. Structure Venting System/HVAC Modification System | <input type="checkbox"/> 6. Temporary Evacuation or Relocation of Residents |
| <input checked="" type="checkbox"/> 7. Product or NAPL Recovery | <input type="checkbox"/> 8. Fencing and Sign Posting |
| <input type="checkbox"/> 9. Groundwater Treatment Systems | <input type="checkbox"/> 10. Soil Vapor Extraction |
| <input type="checkbox"/> 11. Remedial Additives | <input type="checkbox"/> 12. Air Sparging |
| <input type="checkbox"/> 13. Active Exposure Pathway Mitigation System | <input type="checkbox"/> 14. Passive Exposure Pathway Mitigation System |



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 105

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Release Tracking Number

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D. DESCRIPTION OF RESPONSE ACTIONS: (cont.)

☐ 15. Excavation of Contaminated Soils.

☐ a. Re-use, Recycling or Treatment

☐ i. On Site

Estimated volume in cubic yards

☐ ii. Off Site

Estimated volume in cubic yards

iiia. Receiving Facility:

Town:

State:

iiib. Receiving Facility:

Town:

State:

iii. Describe:

☐ b. Store

☐ i. On Site

Estimated volume in cubic yards

☐ ii. Off Site

Estimated volume in cubic yards

iiia. Receiving Facility:

Town:

State:

iiib. Receiving Facility:

Town:

State:

☐ c. Landfill

☐ i. Cover

Estimated volume in cubic yards

Receiving Facility:

Town:

State:

☐ ii. Disposal

Estimated volume in cubic yards

Receiving Facility:

Town:

State:

☐ 16. Removal of Drums, Tanks, or Containers:

a. Describe Quantity and Amount:

b. Receiving Facility:

Town:

State:

c. Receiving Facility:

Town:

State:

☒ 17. Removal of Other Contaminated Media:

a. Specify Type and Volume:

SPENT SORBENTS, APPROXIMATELY 275 LINEAR FEET

☐ 18. Other Response Actions:

Describe:

☐ 19. Use of Innovative Technologies:

Describe:



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E. 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 an **Immediate Response Action 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 an **Imminent Hazard Evaluation** is being submitted, this Imminent Hazard Evaluation was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and the assessment activity(ies) undertaken to support this Imminent Hazard Evaluation comply(ies) with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that an **Immediate Response Action Status Report** and/or a **Remedial Monitoring Report** is(are) 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) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Immediate Response Action Completion Statement** or a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard** 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.

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 #: 7262

2. First Name: ERICS

3. Last Name: WOOD

4. Telephone: 978-449-0343

5. Ext: _____

6. Email: eswood@environcorp.com

7. Signature: _____

8. Date: _____ (mm/dd/yyyy)

9. LSP Stamp:





Massachusetts Department of Environmental Protection
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F. PERSON UNDERTAKING IRA:

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: HAFFNER REALTY TRUST
3. Contact First Name: JOANNE 4. Last Name: FOURNIER
5. Street: 575 OSGOOD STREET, #2205 6. Title: PRESIDENT
7. City/Town: NORTH ANDOVER 8. State: MA 9. Zip Code: 018450000
10. Telephone: 978-683-2771 11. Ext: 12. Email:

G. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON UNDERTAKING IRA:

- ☒ Check here to change relationship
- ☒ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter
- ☒ e. Other RP or PRP Specify Relationship: ELIGIBLE PERSON PER MGL CH21E
- ☐ 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 Undertaking Response Actions: Specify Relationship:

H. REQUIRED ATTACHMENT AND SUBMITTALS:

- ☐ 1. Check here if any Remediation Waste, generated as a result of this IRA, will be stored, treated, managed, recycled or reused at the site following submission of the IRA Completion Statement. If this box is checked, you must submit one of the following plans, along with the appropriate transmittal form.
- ☐ a. A Release Abatement Measure (RAM) Plan (BWSC106) ☐ b. Phase IV Remedy Implementation Plan (BWSC108)
- ☐ 2. 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 MassDEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
- ☐ 3. Check here to certify that the Chief Municipal Officer and the Local Board of Health were notified of the implementation of an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 4. Check here to certify that the Chief Municipal Officer and the Local Board of Health were notified of the submittal of a Completion Statement for an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 5. 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.
- ☒ 6. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



Massachusetts Department of Environmental Protection
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Immediate Response Action (IRA) Transmittal Form

Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

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I. CERTIFICATION OF PERSON UNDERTAKING IRA:

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 the/those individual(s) immediately responsible for obtaining the information, the material information contained herein is, to the best of my knowledge, information and belief, true, accurate and complete; (iii) that, to the best of my knowledge, information and belief, I/the person(s) or entity(ies) on whose behalf this submittal is made satisfy(ies) the criteria in 310 CMR 40.0183(2); (iv) that I/the person(s) or entity(ies) on whose behalf this submittal is made have provided notice in accordance with 310 CMR 40.0183(5); and (v) 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/are 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: PRESIDENT

4. For: HAFFNER REALTY TRUST 5. Date: _____ (mm/dd/yyyy)

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

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:)