Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

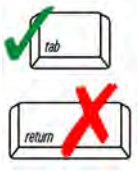
Provided by MassDEP:

MassDEP File Number

Document Transaction Number

City/Town

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



Note: Before completing this form consult your local Conservation Commission regarding any municipal bylaw or ordinance.

A. General Information

1. Project Location (**Note:** electronic filers will click on button to locate project site):

284 Winter Street	Haverhill	01830
a. Street Address	b. City/Town	c. Zip Code

Latitude and Longitude:

N 42d 46m 38s	W 71d 05m 16s
d. Latitude	e. Longitude

Parcel ID 307-2-1	307-2-1
f. Assessors Map/Plat Number	g. Parcel /Lot Number

2. Applicant:

Jesse	Edmands (Representative of Boston Gas Company)
a. First Name	b. Last Name

Boston Gas Company
c. Organization

170 Data Drive
d. Street Address

Waltham	MA	02341
e. City/Town	f. State	g. Zip Code

781-906-3987		jesse.edmands@nationalgrid.com
h. Phone Number	i. Fax Number	j. Email Address

3. Property owner (required if different from applicant): ☐ Check if more than one owner

Matthew	LaLone (Representative of HEG)
a. First Name	b. Last Name

HEG 284 Winter Street LLC
c. Organization

2 International Way
d. Street Address

Lawrence	MA	01843
e. City/Town	f. State	g. Zip Code

(978) 552-6600		mlalone@haffnersenergy.com
h. Phone Number	i. Fax Number	j. Email address

4. Representative (if any):

Billie-Jo	Gauley
a. First Name	b. Last Name

Anchor QEA
c. Company

9 Water St
d. Street Address

Amesbury	MA	01913
e. City/Town	f. State	g. Zip Code

978-712-4475		bgauley@anchorqea.com
h. Phone Number	i. Fax Number	j. Email address

5. Total WPA Fee Paid (from NOI Wetland Fee Transmittal Form):

$1,500	$737.50	$762.50
a. Total Fee Paid	b. State Fee Paid	c. City/Town Fee Paid

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A. General Information (continued)

6. General Project Description:

The proposed project includes the installation of an air sparge and soil vapor extraction system at 284 Winter Street and a temporary cap within a portion of the MassDEP Waterways-licensed semi-permanent boom system within the Little River adjacent to 284 Winter Street. Additional project description is included in the attached Project Narrative.

7a. Project Type Checklist: (Limited Project Types see Section A. 7b.)

1. ☐ Single Family Home
2. ☐ Residential Subdivision
3. ☐ Commercial/Industrial
4. ☐ Dock/Pier
5. ☐ Utilities
6. ☐ Coastal engineering Structure
7. ☐ Agriculture (e.g., cranberries, forestry)
8. ☐ Transportation
9. ☒ Other

7b. Is any portion of the proposed activity eligible to be treated as a limited project (including Ecological Restoration Limited Project) subject to 310 CMR 10.24 (coastal) or 310 CMR 10.53 (inland)?

1. ☒ Yes ☐ No

If yes, describe which limited project applies to this project. (See 310 CMR 10.24 and 10.53 for a complete list and description of limited project types)

Remediation project

2. Limited Project Type

If the proposed activity is eligible to be treated as an Ecological Restoration Limited Project (310 CMR10.24(8), 310 CMR 10.53(4)), complete and attach Appendix A: Ecological Restoration Limited Project Checklist and Signed Certification.

8. Property recorded at the Registry of Deeds for:

a. County	b. Certificate # (if registered land)
Southern Essex	
c. Book	d. Page Number
6304	656

B. Buffer Zone & Resource Area Impacts (temporary & permanent)

1. ☐ Buffer Zone Only – Check if the project is located only in the Buffer Zone of a Bordering Vegetated Wetland, Inland Bank, or Coastal Resource Area.
2. ☒ Inland Resource Areas (see 310 CMR 10.54-10.58; if not applicable, go to Section B.3, Coastal Resource Areas).

Check all that apply below. Attach narrative and any supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.

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B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)

For all projects affecting other Resource Areas, please attach a narrative explaining how the resource area was delineated.

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
a. ■ Bank	0 (1. linear feet)	0 (2. linear feet)
b. ☐ Bordering Vegetated Wetland	(1. square feet)	(2. square feet)
c. ■ Land Under Waterbodies and Waterways	2175 (1. square feet); (3. cubic yards dredged)	(2. square feet)

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
d. ☐ Bordering Land Subject to Flooding	(1. square feet); (3. cubic feet of flood storage lost)	(2. square feet); (4. cubic feet replaced)
e. ☐ Isolated Land Subject to Flooding	(1. square feet); (2. cubic feet of flood storage lost)	(3. cubic feet replaced)
f. ■ Riverfront Area	Little River (inland) (1. Name of Waterway (if available) - **specify coastal or inland**)	

2. Width of Riverfront Area (check one):

☐ 25 ft. - Designated Densely Developed Areas only

☐ 100 ft. - New agricultural projects only

■ 200 ft. - All other projects

3. Total area of Riverfront Area on the site of the proposed project: _____ square feet

4. Proposed alteration of the Riverfront Area:

a. total square feet	b. square feet within 100 ft.	c. square feet between 100 ft. and 200 ft.
14,810	14,810	0

5. Has an alternatives analysis been done and is it attached to this NOI? ■ Yes ☐ No

6. Was the lot where the activity is proposed created prior to August 1, 1996? ■ Yes ☐ No

3. ☐ Coastal Resource Areas: (See 310 CMR 10.25-10.35)

Note: for coastal riverfront areas, please complete **Section B.2.f**. above.

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Provided by MassDEP:

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B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)

Check all that apply below. Attach narrative and supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.

Online Users: Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
a. ☐ Designated Port Areas	Indicate size under Land Under the Ocean, below	
b. ☐ Land Under the Ocean	1. square feet 2. cubic yards dredged	
c. ☐ Barrier Beach	Indicate size under Coastal Beaches and/or Coastal Dunes below	
d. ☐ Coastal Beaches	1. square feet	2. cubic yards beach nourishment
e. ☐ Coastal Dunes	1. square feet	2. cubic yards dune nourishment
	Size of Proposed Alteration	Proposed Replacement (if any)
f. ☐ Coastal Banks	1. linear feet	
g. ☐ Rocky Intertidal Shores	1. square feet	
h. ☐ Salt Marshes	1. square feet	2. sq ft restoration, rehab., creation
i. ☐ Land Under Salt Ponds	1. square feet 2. cubic yards dredged	
j. ☐ Land Containing Shellfish	1. square feet	
k. ☐ Fish Runs	Indicate size under Coastal Banks, inland Bank, Land Under the Ocean, and/or inland Land Under Waterbodies and Waterways, above 1. cubic yards dredged	
l. ☐ Land Subject to Coastal Storm Flowage	1. square feet	

4. ☐ Restoration/Enhancement

If the project is for the purpose of restoring or enhancing a wetland resource area in addition to the square footage that has been entered in Section B.2.b or B.3.h above, please enter the additional amount here.

a. square feet of BVW

b. square feet of Salt Marsh

5. ☐ Project Involves Stream Crossings

a. number of new stream crossings

b. number of replacement stream crossings

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C. Other Applicable Standards and Requirements

☐ This is a proposal for an Ecological Restoration Limited Project. Skip Section C and complete Appendix A: Ecological Restoration Limited Project Checklists – Required Actions (310 CMR 10.11).

Streamlined Massachusetts Endangered Species Act/Wetlands Protection Act Review

1. Is any portion of the proposed project located in **Estimated Habitat of Rare Wildlife** as indicated on the most recent Estimated Habitat Map of State-Listed Rare Wetland Wildlife published by the Natural Heritage and Endangered Species Program (NHESP)? To view habitat maps, see the *Massachusetts Natural Heritage Atlas* or go to http://maps.massgis.state.ma.us/PRI_EST_HAB/viewer.htm.

   a. ☐ Yes ■ No

   If yes, include proof of mailing or hand delivery of NOI to:

   Natural Heritage and Endangered Species Program
   Division of Fisheries and Wildlife
   1 Rabbit Hill Road
   Westborough, MA 01581

   b. Date of map

   If *yes*, the project is also subject to Massachusetts Endangered Species Act (MESA) review (321 CMR 10.18). To qualify for a streamlined, 30-day, MESA/Wetlands Protection Act review, please complete Section C.1.c, and include requested materials with this Notice of Intent (NOI); *OR* complete Section C.2.f, if applicable. *If MESA supplemental information is not included with the NOI, by completing Section 1 of this form, the NHESP will require a separate MESA filing which may take up to 90 days to review (unless noted exceptions in Section 2 apply, see below).*

   c. Submit Supplemental Information for Endangered Species Review*

      1. ☐ Percentage/acreage of property to be altered:

         (a) within wetland Resource Area _____ percentage/acreage

         (b) outside Resource Area _____ percentage/acreage

      2. ☐ Assessor's Map or right-of-way plan of site

2. ■ Project plans for entire project site, including wetland resource areas and areas outside of wetlands jurisdiction, showing existing and proposed conditions, existing and proposed tree/vegetation clearing line, and clearly demarcated limits of work **

   (a) ■ Project description (including description of impacts outside of wetland resource area & buffer zone)

   (b) ■ Photographs representative of the site

* Some projects **not** in Estimated Habitat may be located in Priority Habitat, and require NHESP review (see https://www.mass.gov/ma-endangered-species-act-mesa-regulatory-review).
Priority Habitat includes habitat for state-listed plants and strictly upland species not protected by the Wetlands Protection Act.
** MESA projects may not be segmented (321 CMR 10.16). The applicant must disclose full development plans even if such plans are not required as part of the Notice of Intent process.

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C. Other Applicable Standards and Requirements (cont'd)

(c) ☐ MESA filing fee (fee information available at https://www.mass.gov/how-to/how-to-file-for-a-mesa-project-review).
Make check payable to "Commonwealth of Massachusetts - NHESP" and ***mail to NHESP*** at above address

*Projects altering **10 or more acres** of land, also submit:*

(d) ☐ Vegetation cover type map of site

(e) ☐ Project plans showing Priority & Estimated Habitat boundaries

(f) OR Check One of the Following

1. ☐ Project is exempt from MESA review.
Attach applicant letter indicating which MESA exemption applies. (See 321 CMR 10.14, https://www.mass.gov/service-details/exemptions-from-review-for-projectsactivities-in-priority-habitat; the NOI must still be sent to NHESP if the project is within estimated habitat pursuant to 310 CMR 10.37 and 10.59.)

2. ☐ Separate MESA review ongoing. a. NHESP Tracking # b. Date submitted to NHESP

3. ☐ Separate MESA review completed.
Include copy of NHESP "no Take" determination or valid Conservation & Management Permit with approved plan.

3. For coastal projects only, is any portion of the proposed project located below the mean high water line or in a fish run?

a. ■ Not applicable – project is in inland resource area only b. ☐ Yes ☐ No

If yes, include proof of mailing, hand delivery, or electronic delivery of NOI to either:

South Shore - Bourne to Rhode Island border, and the Cape & Islands:

Division of Marine Fisheries -
Southeast Marine Fisheries Station
Attn: Environmental Reviewer
836 South Rodney French Blvd.
New Bedford, MA 02744
Email: dmf.envreview-south@mass.gov

North Shore - Plymouth to New Hampshire border:

Division of Marine Fisheries -
North Shore Office
Attn: Environmental Reviewer
30 Emerson Avenue
Gloucester, MA 01930
Email: dmf.envreview-north@mass.gov

Also if yes, the project may require a Chapter 91 license. For coastal towns in the Northeast Region, please contact MassDEP's Boston Office. For coastal towns in the Southeast Region, please contact MassDEP's Southeast Regional Office.

c. ☐ Is this an aquaculture project? d. ☐ Yes ■ No

If yes, include a copy of the Division of Marine Fisheries Certification Letter (M.G.L. c. 130, § 57).

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Provided by MassDEP:
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City/Town

C. Other Applicable Standards and Requirements (cont'd)

Online Users: Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

4. Is any portion of the proposed project within an Area of Critical Environmental Concern (ACEC)?

   a. ☐ Yes ■ No If yes, provide name of ACEC (see instructions to WPA Form 3 or MassDEP Website for ACEC locations). **Note:** electronic filers click on Website.

   b. ACEC

5. Is any portion of the proposed project within an area designated as an Outstanding Resource Water (ORW) as designated in the Massachusetts Surface Water Quality Standards, 314 CMR 4.00?

   a. ☐ Yes ■ No

6. Is any portion of the site subject to a Wetlands Restriction Order under the Inland Wetlands Restriction Act (M.G.L. c. 131, § 40A) or the Coastal Wetlands Restriction Act (M.G.L. c. 130, § 105)?

   a. ☐ Yes ■ No

7. Is this project subject to provisions of the MassDEP Stormwater Management Standards?

   a. ■ Yes. Attach a copy of the Stormwater Report as required by the Stormwater Management Standards per 310 CMR 10.05(6)(k)-(q) and check if:

      1. ☐ Applying for Low Impact Development (LID) site design credits (as described in Stormwater Management Handbook Vol. 2, Chapter 3)

      2. ☐ A portion of the site constitutes redevelopment

      3. ☐ Proprietary BMPs are included in the Stormwater Management System.

   b. ☐ No. Check why the project is exempt:

      1. ☐ Single-family house

      2. ☐ Emergency road repair

      3. ☐ Small Residential Subdivision (less than or equal to 4 single-family houses or less than or equal to 4 units in multi-family housing project) with no discharge to Critical Areas.

D. Additional Information

☐ This is a proposal for an Ecological Restoration Limited Project. Skip Section D and complete Appendix A: Ecological Restoration Notice of Intent – Minimum Required Documents (310 CMR 10.12).

Applicants must include the following with this Notice of Intent (NOI). See instructions for details.

Online Users: Attach the document transaction number (provided on your receipt page) for any of the following information you submit to the Department.

1. ■ USGS or other map of the area (along with a narrative description, if necessary) containing sufficient information for the Conservation Commission and the Department to locate the site. (Electronic filers may omit this item.)

2. ☐ Plans identifying the location of proposed activities (including activities proposed to serve as a Bordering Vegetated Wetland [BVW] replication area or other mitigating measure) relative to the boundaries of each affected resource area.

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Provided by MassDEP:

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City/Town

D. Additional Information (cont'd)

3. ☐ Identify the method for BVW and other resource area boundary delineations (MassDEP BVW Field Data Form(s), Determination of Applicability, Order of Resource Area Delineation, etc.), and attach documentation of the methodology.

4. ■ List the titles and dates for all plans and other materials submitted with this NOI.

(See attached Project Figures)
a. Plan Title

b. Prepared By

c. Signed and Stamped by

d. Final Revision Date

e. Scale

f. Additional Plan or Document Title

g. Date

5. ☐ If there is more than one property owner, please attach a list of these property owners not listed on this form.

6. ☐ Attach proof of mailing for Natural Heritage and Endangered Species Program, if needed.

7. ☐ Attach proof of mailing for Massachusetts Division of Marine Fisheries, if needed.

8. ■ Attach NOI Wetland Fee Transmittal Form

9. ■ Attach Stormwater Report, if needed.

E. Fees

1. ☐ Fee Exempt: No filing fee shall be assessed for projects of any city, town, county, or district of the Commonwealth, federally recognized Indian tribe housing authority, municipal housing authority, or the Massachusetts Bay Transportation Authority.

Applicants must submit the following information (in addition to pages 1 and 2 of the NOI Wetland Fee Transmittal Form) to confirm fee payment:

Payment Paid Online Through eDEP
2. Municipal Check Number

3. Check date

4. State Check Number

5. Check date

6. Payor name on check: First Name

7. Payor name on check: Last Name

Massachusetts Department of Environmental Protection
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Provided by MassDEP:

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F. Signatures and Submittal Requirements

I hereby certify under the penalties of perjury that the foregoing Notice of Intent and accompanying plans, documents, and supporting data are true and complete to the best of my knowledge. I understand that the Conservation Commission will place notification of this Notice in a local newspaper at the expense of the applicant in accordance with the wetlands regulations, 310 CMR 10.05(5)(a).

I further certify under penalties of perjury that all abutters were notified of this application, pursuant to the requirements of M.G.L. c. 131, § 40. Notice must be made by Certificate of Mailing or in writing by hand delivery or certified mail (return receipt requested) to all abutters within 100 feet of the property line of the project location.

Jesse Edmands
1. Signature of Applicant

09/18/2024
2. Date

3. Signature of Property Owner (if different)

4. Date

Billie-Jo Gauley
5. Signature of Representative (if any)

09/19/2024
6. Date

For Conservation Commission:
Two copies of the completed Notice of Intent (Form 3), including supporting plans and documents, two copies of the NOI Wetland Fee Transmittal Form, and the city/town fee payment, to the Conservation Commission by certified mail or hand delivery.

For MassDEP:
One copy of the completed Notice of Intent (Form 3), including supporting plans and documents, one copy of the NOI Wetland Fee Transmittal Form, and a **copy** of the state fee payment to the MassDEP Regional Office (see Instructions) by certified mail or hand delivery.

Other:
If the applicant has checked the “yes” box in any part of Section C, Item 3, above, refer to that section and the Instructions for additional submittal requirements.

The original and copies must be sent simultaneously. Failure by the applicant to send copies in a timely manner may result in dismissal of the Notice of Intent.

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

NOI Wetland Fee Transmittal Form

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.

A. Applicant Information

1. Location of Project:

284 Winter Street	Haverhill
a. Street Address	b. City/Town
c. Check number	d. Fee amount

2. Applicant Mailing Address:

Jesse	Edmands (Representative of Boston Gas Company)	
a. First Name	b. Last Name	
Boston Gas Company		
c. Organization		
170 Data Drive		
d. Mailing Address		
Waltham	MA	02341
e. City/Town	f. State	g. Zip Code
781-906-3987	jesse.edmands@nationalgrid.com	
h. Phone Number	i. Fax Number	j. Email Address

3. Property Owner (if different):

Matthew	LaLone (Representative of HEG)	
a. First Name	b. Last Name	
HEG 284 Winter Street LLC		
c. Organization		
2 International Way		
d. Mailing Address		
Lawrence	MA	01843
e. City/Town	f. State	g. Zip Code
(978) 552-6600	mlalone@haffnersenergy.com	
h. Phone Number	i. Fax Number	j. Email Address

B. Fees

To calculate filing fees, refer to the category fee list and examples in the instructions for filling out WPA Form 3 (Notice of Intent).

Fee should be calculated using the following process & worksheet. ***Please see Instructions before filling out worksheet.***

Step 1/Type of Activity: Describe each type of activity that will occur in wetland resource area and buffer zone.

Step 2/Number of Activities: Identify the number of each type of activity.

Step 3/Individual Activity Fee: Identify each activity fee from the six project categories listed in the instructions.

Step 4/Subtotal Activity Fee: Multiply the number of activities (identified in Step 2) times the fee per category (identified in Step 3) to reach a subtotal fee amount. Note: If any of these activities are in a Riverfront Area in addition to another Resource Area or the Buffer Zone, the fee per activity should be multiplied by 1.5 and then added to the subtotal amount.

Step 5/Total Project Fee: Determine the total project fee by adding the subtotal amounts from Step 4.

Step 6/Fee Payments: To calculate the state share of the fee, divide the total fee in half and subtract $12.50. To calculate the city/town share of the fee, divide the total fee in half and add $12.50.

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B. Fees (continued)

Step 1/Type of Activity	Step 2/Number of Activities	Step 3/Individual Activity Fee	Step 4/Subtotal Activity Fee
Air sparge and excavation	1	2e	$750 (includes 1.5X)
Temporary cap placement	1	2e	$750 (includes 1.5X)

Step 5/Total Project Fee: $1,500

Step 6/Fee Payments:

Total Project Fee:	$1,500 a. Total Fee from Step 5
State share of filing Fee:	$737.50 b. 1/2 Total Fee **less $**12.50
City/Town share of filling Fee:	$762.50 c. 1/2 Total Fee **plus** $12.50

C. Submittal Requirements

a.) Complete pages 1 and 2 and send with a check or money order for the state share of the fee, payable to the Commonwealth of Massachusetts.

Department of Environmental Protection
Box 4062
Boston, MA 02211

b.) **To the Conservation Commission:** Send the Notice of Intent or Abbreviated Notice of Intent; a **copy** of this form; and the city/town fee payment.

To MassDEP Regional Office (see Instructions): Send a copy of the Notice of Intent or Abbreviated Notice of Intent; a **copy** of this form; and a **copy** of the state fee payment. (E-filers of Notices of Intent may submit these electronically.)

City of Haverhill Conservation Commission

HCC Local Application Form 3
Notice of Intent

A. STATUTE APPLICABILITY

This application is being filed with the Commission in accordance with the following (check all that apply):

- ✓ Massachusetts Wetlands Protection Act, M.G.L. Chapter 131, Section 40
- ✓ Haverhill Municipal Ordinance Chapter 253

B. GENERAL INFORMATION

Applicant Boston Gas Company (applicant representative - Jesse Edmands)
Property Owner HEG 284 Winter Street LLC (Owner representative is Matthew LaLone, President of Administration & General Counsel)
Representative Billie-Jo Gauley, Anchor QEA, INC
Location (Street Address) 284 Winter Street, Haverhill, MA
Assessor's Parcel Identification 307-2-1

C. APPLICATION CHECKLIST

The Commission requires the submittal of this original, completed Form; one (1) paper copy of site plans; and one (1) paper copy of all other materials. Additionally, the Commission requires the submittal of individual PDFs of this Form and all listed application materials. If practical, related items may be combined into a single PDF. PDFs should not mix larger format sheets (e.g. site plans) with smaller sheets (e.g. letters). These submittal requirements also apply to supplemental information provided during the public hearing. The following materials shall be submitted with this form:

- ☑ Completed, current WPA Form 3, 3A, or 4 and NOI Wetland Fee Transmittal Form
- ☑ Project Narrative with description of resource areas & delineation methodology and demonstration of compliance with pertinent Performance Standards
- ☑ Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan See Stormwater Report and Checklist and sedimentation/erosion control features shown on Figures 3 and 4
- ☑ Site Plans clearly describing the location and nature of the work, including such information as site boundaries, wetlands, topography, existing and proposed conditions, vegetation cover, soils, erosion & sedimentation controls, Title 5 compliance, flood storage calculations…(24" x 36" max. sheet size)
- ☐ MassDEP Bordering Vegetated Wetland Delineation Field Data Forms, as appropriate N/A – no bordering vegetated wetland present at the Site
- ☐ Wetland Resource Area Impact Mitigation Plan prepared in accordance with MA Inland Wetland Replication Guidelines, if applicable N/A – no bordering vegetated wetland present at the Site
- ☐ Demonstration of compliance with MA River & Stream Crossing Standards, if applicable (The HCC applies the General Standards to all resource area crossings for wildlife passage.) N/A
- ☐ Simplified or Detailed Wildlife Habitat Evaluation (Appendix A or B), if applicable (See "MA Wildlife Habitat Protection Guidance for Inland Wetlands") Temporary impacts anticipated in Land Under Waterbodies and Waterways (<5,000 SF) and Riverfront Area (previously developed) are below thresholds, therefore completion of a Simplified or Detailed Wildlife Habitat Evaluation is not required.
- ☑ Demonstration of compliance with MA Stormwater Management Standards, including but not limited to

- ☑ Stormwater Report with pertinent calculations based on NOAA Atlas 14 rainfall data See attached Stormwater Report
- ☑ Checklist for Stormwater Report
- ☐ Long-Term Pollution Prevention Plan N/A
- ☐ Operation and Maintenance Plan N/A
- ☑ Illicit Discharge Compliance Statement

☑ 8½" x 11" sections of the following maps with project location clearly identified

- ☑ USGS Quadrangle See Figure 1
- ☑ MassGIS Orthophoto
- ☑ City of Haverhill Parcel ID Map, also identifying properties within 300' of subject property
- ☑ NRCS Soils Map and Resource Report
- ☐ FEMA Flood Insurance Rate Map, if applicable N/A
- ☐ MA NHESP Estimated Habitats of Rare Wildlife and Priority Habitats of Rare Species, if applicable N/A
- ☐ MassDEP/UMass-Amherst Habitat of Potential Regional or Statewide Importance, if applicable N/A

☐ Proof of NOI filing with the MA Natural Heritage & Endangered Species Program, if applicable N/A

☑ Appropriate Filing Fees, payable to the City of Haverhill, under the Act and Ordinance

☐ Other: _____

D. LOCAL PERMIT DOCUMENTATION

In accordance with 310 CMR 10.05(4)(e), list all obtainable permits, variances, and approvals required by local ordinance with respect to the proposed activity and status of same: City of Haverhill NOI/Order of Conditions Chapter 91 Minor Modification, USACE self-verification

E. APPLICATION CERTIFICATION

I have read the Department of Environmental Protection's "Instructions for Completing Application" and the City's Municipal Ordinance under Chapter 253, with all applicable regulations and policies, for the filing of this application with the Haverhill Conservation Commission and agree to its terms and conditions, as amended. I understand the submitted NOI, its plans, and all its supporting materials are public records and may be uploaded to the City's website for public review. As required by the Commission, the wetland resource area(s) are flagged, the corners of proposed structures are staked, and the centerline of proposed roadway(s) and/or driveway(s) are marked, as appropriate, to facilitate site inspections by Commissioners and Conservation Staff.

Signed: Jesse Edmands (APPLICANT) 09/18/2024 (DATE)

F. SITE ACCESS ACKNOWLEDGEMENT

I hereby grant the Haverhill Conservation Commission and its officials permission to enter upon my property at 284 Winter Street, Haverhill MA; Parcel ID 307-2-1 to review the filed Notice of Intent and
(STREET ADDRESS AND ASSESSOR'S PARCEL ID)
future site conditions for compliance with the issued Order of Conditions. The sole purpose of this acknowledgement is to allow the Commission and its officials to perform their duties under the Massachusetts Wetlands Protection Act and the City's wetlands protection ordinance.

Signed: Will be provided ASAP _____ _____
(PROPERTY OWNER) (DATE)

G. AFFIDAVIT OF SERVICE FOR ABUTTER NOTIFICATION

I, __Billie-Jo Gauley_____, hereby certify under the pains and penalties of perjury that on
(NAME OF PERSON MAKING AFFIDAVIT)
_____9/19/24_____ I gave notification to all abutters pursuant to the requirements of the second
(DATE)
paragraph of Massachusetts General Laws Chapter 131, Section 40, the DEP Guide to Abutter Notification dated April 8, 1994, and Haverhill Municipal Ordinance Chapter 253, Section 5 in connection with the following matter:

A Notice of Intent filed under the Massachusetts Wetlands Protection Act and said ordinance by Boston Gas Company_____ with the Haverhill Conservation Commission on
(NAME OF APPLICANT)
_____9/19/24_____ for property located at 284 Winter Street, Haverhill MA; Parcel ID 307-2-1
(DATE) (STREET ADDRESS AND ASSESSOR'S PARCEL ID)

The list of the abutters to whom the Abutter Notification Form sent, with their addresses and Assessor's parcel identification information that corresponds with the submitted map section, are attached to this application.

Signed: Billie-Jo L Gauley _____ 9/19/24
(NAME OF PERSON MAKING AFFIDAVIT) (DATE)

H. ABUTTER NOTIFICATION FORM

In accordance with the second paragraph of Massachusetts General Laws Chapter 131, Section 40 (the Wetlands Protection Act) and Haverhill Municipal Ordinance Chapter 253, Section 5, you are hereby notified of the following:

1. The name of the applicant is Boston Gas Company (project representative – Jesse Edmands)
2. Brief Project Description:

The proposed project is for the installation of an air sparge/soil vapor extraction system at 284 Winter Street and a temporary cap within a portion of the licensed semi-permanent boom system within the Little River adjacent to 284 Winter Street.

The air sparge system includes the installation of air sparge and soil vapor extraction wells, trenching for system piping, and the installation/placement of a control system (located within a conex box). In addition, limited excavation will be conducted to remove coal tar deposits.

The temporary cap includes the placement of (from bottom up): a reactive core mat containing organoclay attached to a 6-inch armor layer composed of stone contained within geotextile (i.e., armor mattress). The reactive core mat will reduce the generation of sheens on surface water in the river by sorbing non-aqueous phase liquid before it is released to the water column. This will help to extend the service life of the sorbent booms and reduce the appearance of sheens on surface water. Placement of the temporary cap is proposed along an approximately 275-ft linear stretch of the river, and the footprint will be limited to the footprint of the licensed semi-permanent boom system.

3. The applicant has filed a Notice of Intent ("NOI") with the Haverhill Conservation Commission seeking permission to remove, fill, dredge or alter an Area Subject to Protection Under the Wetlands Protection Act and/or Haverhill Municipal Ordinance Chapter 253 and/or to perform work within the buffer zone of such an Area.
4. The address of the lot where the activity is proposed is 284 Winter St., Haverhill MA; Parcel ID 307-2-1
   (INCLUDE ASSESSOR'S MAP/BLOCK/LOT)
5. Copies of the NOI may be examined at *the Haverhill Conservation Department Office* between the hours of *8am and 4pm* from *Monday through Friday*. Contact information is below. You may also find helpful application materials on the "Projects Under Review" section of the Commission's website.
6. Copies of the NOI may be obtained from either (check one) the applicant _____, or the applicant's representative X, by calling this telephone number (978) 712-4475 between the hours of 9:00 AM and 5:00 PM on the following days of the week Monday through Friday
7. Information regarding the *date, time, and place* of the public hearing may be obtained from the *Haverhill Conservation Department Office* between the hours of *8am and 4pm* from *Monday through Friday*. Contact information is below. You may also consult the "Agenda" section of the Commission's website.

NOTE: Notice of the public hearing, including its date, time and place, will be published at least five (5) days in advance in the *Haverhill Gazette newspaper*.

NOTE: Notice of the public hearing, including its date, time, and place, will be posted in Haverhill City Hall not less than forty-eight (48) hours in advance.

NOTE: You may contact the Haverhill Conservation Department for more information about this application, the Wetlands Protection Act, and Haverhill Municipal Ordinance Chapter 253. Please note the Department has only one staff person; every effort will be made to assist you in a timely manner.

Website: http://www.cityofhaverhill.org/departments/conservation_commission/index.php.
Email: conservation@cityofhaverhill.com
Phone: 978.374.2334

NOTE: For additional information about this application and the Act, you may contact the MA Department of Environmental Protection Northeast Regional Office Service Center.

Website: http://www.mass.gov/eea/agencies/massdep/about/contacts/northeast-region.html
Phone: 978.694.3200

I. LOCAL ORDINANCE FEE CALCULATION FORM

ACTIVITY	LOCAL ORDINANCE FEE	# of Activities or Measurement	Subtotal
***Abbrev. Notice of Resource Area Delineation (ANRAD)**			
Single Family House Project	$1/linear foot, first 100'; $0.50/lf, second 100'; $0.10/lf, each additional foot	0	
All Other Projects	***$1/linear foot, first 1000'; $0.50/lf, second 1000'; $0.10/lf, each additional foot		
%*Notices of Intent (NOI)			
Category 1 Activity	$100		
Category 2 Activity	$250	2	$750 (inc 1.5)
Category 3 Activity	$525		
Category 4 Activity	$725		
Category 5 Activity	$2/foot		
Category 6 Activity - If no ANRAD was filed for the project site, then a local Cat. 6 fee must be paid in accordance with the ANRAD fee schedule	See ANRAD fee schedule	275+240 LF	$772.50 (inc. 1.5)
Resource Area Alterations			
Buffer Zone, 75'-100' from resource area boundary	$0.05 / square foot		
Buffer Zone, 35'-75' from resource area boundary	$0.10 / square foot		
Buffer Zone, 0'-35' from resource area boundary	$0.25 / square foot		
Bordering Vegetated Wetland	$0.50 / square foot		
Bank	$5 / linear foot		
Land Under Water	$0.50 / square foot		
Land Subject to Flooding	$0.05 / square foot		
Riverfront Area	$0.05 / square foot		
Riverfront Area with the watershed of a potable water supply	$0.50 / square foot		
Land within 100' of a Certified Vernal Pool	$0.25 / square foot		
Local-only Jurisdictional Resource Area	$0.25 / square foot		
Land within 200' of a potable water supply	$0.50 / square foot		
		ADVERTISING FEE*	$45
		LOCAL ORDINANCE FEE TOTAL	$1,567.50
		For filings resulting from enforcement action, double the Local Ordinance Fee Total	

NOTES:

*****Application is subject to an additional $45 Local Advertising Fee payable to the City of Haverhill prior to **EACH** advertising

***Local Ordinance Fee maximum of $100 for applications exceeding 1000'. Commission requires review by outside consultant under M.G.L. Ch. 44, sec. 53G for projects exceeding 1000'. Applicant shall post escrow in accordance with HCC Rules for Hiring Outside Consultants. Cap passed by a 5-0 vote of the Commission on March 7, 2019.

%Local Ordinance Fees for RDA, NOI, & RMOC increase 50% when project is also proposed within a Riverfront Area

Local Ordinance Fees passed by a 7 – 0 vote of the Commission on October 28, 2010, effective January 1, 2011

Project Narrative

September 2024
284 Winter Street, Former Haverhill MGP Site

ANCHOR QEA

Notice of Intent Narrative

Prepared for Boston Gas Company d/b/a National Grid

September 2024
284 Winter Street, Former Haverhill MGP Site

Notice of Intent Narrative

Prepared for
Boston Gas Company
d/b/a National Grid
170 Data Drive
Waltham, Massachusetts 02451

Prepared by
Anchor QEA, LLC
9 Water Street
Amesbury, Massachusetts 01913

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ATTACHMENTS

ABBREVIATIONS

AS/SVE	air sparging/soil vapor extraction
BMP	best management practice
City	City of Haverhill
CFR	Code of Federal Regulations
CMR	Code of Massachusetts Regulations
CRA	Comprehensive Remedial Alternative
DMF	Division of Marine Fisheries
FIR	Final Inspection Report
GZA	GZA GeoEnvironmental, Inc.
Haffner's	Haffner Realty Trust (an Energy North Company)
IRA	Immediate Response Action
LSP	Licensed Site Professional
MassDEP	Massachusetts Department of Environmental Protection
MCP	Massachusetts Contingency Plan
MGP	manufactured gas plant
NAPL	non-aqueous phase liquid
NOI	Notice of Intent
OHM	oil and/or hazardous material
OMM	operation, maintenance and monitoring
PSS	Permanent Solution Statement
Ramboll	Ramboll Group
RAA	remedial action alternative
RAP	*Remedial Action Plan*
RTN	Release Tracking Number
Site	former Haverhill manufactured gas plant site
USACE	U.S. Army Corps of Engineers
U.S.D.A.	U.S. Department of Agriculture
VGAC	vapor-phase granular activated carbon
VOC	volatile organic compound
VOT	visible oil and tar
WPA	Massachusetts Wetlands Protection Act

1 Project Description

The purpose of this Notice of Intent (NOI) is to provide notice of and details for the implementation of a Comprehensive Remedial Alternative (CRA), which as proposed would occur in the upland portion of 284 Winter Street and within a portion of the adjacent Little River that is part of the former Haverhill manufactured gas plant (MGP) site (the Site) located at 284 Winter Street in Haverhill, Massachusetts (Figure 1). The Project is required under the Massachusetts Contingency Plan (310 CMR 40.0000: MCP) to remediate a release of oil and/or hazardous material (OHM) associated with historical MGP operations at the Site. Specifically, the Project includes the implementation of a CRA that has been selected in accordance with the Phase III provisions of the MCP outlined in 310 CMR 40.0851 through 40.0869 to achieve a Permanent Solution Statement (PSS, equivalent to regulatory closure) at the Site. The proposed CRA will be conducted by Boston Gas Company d/b/a National Grid to advance the Site toward achieving a Permanent Solution as defined by the MCP at 310 CMR 40.1040. Accordingly, we request that the Project be permitted as a Limited Project in accordance with Section 310 CMR 10.53(3)(q) of the Wetlands Protection Act (WPA).

The Site comprises an upland component and an in-river component and has been assigned Release Tracking Number (RTN) 3-32792 by the Massachusetts Department of Environmental Protection (MassDEP). RTN-3-32875, which was assigned in connection with a notification condition requiring an Immediate Response Action (IRA), also remains active for the Site.

The Project includes an air sparge/soil vapor extraction (AS/SVE) system that will be installed in previously disturbed/developed portions of the upland area to treat groundwater, and a temporary cap placed within an existing semi-permanent boom system in the Little River to mitigate impacts during operation of the AS/SVE. Provisions for recovery of non-aqueous phase liquid (NAPL) will also be incorporated into the system design. As described in this submittal, erosion and sedimentation controls, monitoring plans, and Best Management Practices (BMPs) will be implemented to protect the wetland resource areas during the Project.

The designer and Engineer of Record for the upland portion of the Site is GZA GeoEnvironmental, Inc. (GZA); the designer and Engineer of Record for the in-river portion of the Site is Anchor QEA. The proposed CRA will be implemented under the guidance of Charles Lindberg, Licensed Site Professional of GZA.

This NOI has been prepared and submitted in accordance with the Massachusetts Wetlands Protection Act and its accompanying requirements (310 CMR 10.00), and in accordance with the City of Haverhill's Wetland Protection Ordinance, City Code Chapter 253.

1.1 Site Uses and Existing Conditions

The following sections provide a summary of site uses and existing conditions.

The 284 Winter Street property, where the former MGP once was located, is currently owned by HEG 284 Winter Street LLC and is operated as a Haffner's gas station and car wash (Figure 1). The upland portion of the Site is almost entirely covered by pavement or structures and is separated from the adjacent Little River to the west by a masonry retaining wall (Attachment 1 – Photograph Log). An MGP operated by the Haverhill Gas Company was present at the Site from 1853 until 1970. Commercial and industrial properties surround the property, which is located within downtown Haverhill.

The portion of the Little River that is part of the Site is adjacent to the upland portion of the Site where the former MGP was located (Figure 2). Within the river portion of the Site, the width of the river is variable, ranging from approximately 20 to 60 feet wide. During periods of low water, portions of the riverbed are exposed, but generally, water several feet deep remains in a meandering channel. The sediment surface is a combination of sand, gravel, and cobbles with occasional boulders and debris scattered throughout. Vegetation (e.g., grass, weeds) is also present in the channel at several locations.

The Little River is approximately 12.9 miles long and originates in Kingston, New Hampshire. The river and associated watershed are relatively undeveloped upstream of Haverhill, where it becomes urbanized. There is one dam on the river, located immediately upstream of the Site and the "Richard J Winnell All Volunteer Bridge" (Winter Street Bridge). Downstream of the Site, the Little River flows through a conduit beneath various properties in Haverhill and discharges into the Merrimack River approximately one-quarter mile south of the Site. The distance between the Winter Street Bridge and the opening of the conduit is approximately 530 feet.

The Merrimack River is tidally influenced for 22 miles from the Atlantic Ocean to Haverhill. The Little River may be tidally influenced up to the Little River dam, which is just upstream of the Site. Tidal conditions in the Little River were evaluated by Fuss & O'Neill for the Little River dam removal feasibility study, and they concluded most of the Little River within the conduit just downstream of the Site experienced daily impacts from tides (Fuss & O'Neill 2021). However, only extreme high tides or coastal storm surges appear to have an impact on the Little River upstream of the conduit due to the channel bottom elevations (including the reach adjacent to the Site).

The in-river portion of the Site is constrained by several structures. Approximately 70 feet upstream of the Site is the Little River dam, a stone masonry structure built in the 1800s. The dam and the adjacent mill building likely predate the former MGP. Immediately downstream of the dam is the Winter Street Bridge. Approximately 500 feet south of the Winter Street Bridge is the headwall for the Little River Conduit, which was constructed from 1937 to 1938 as part of the U.S. Army Corps of Engineers' (USACE) Haverhill Local Protection Project. The conduit is operated and maintained by the City of Haverhill.

A vertical retaining wall ranging from 15 to 20 feet tall runs along most of the eastern side of the Little River. The river's western bank slope and the southern portion of the eastern bank are heavily overgrown, steep, and include remnants of former structures such as retaining walls. Photographs of the Winter Street Bridge, the Little River dam, and the river's eastern and western banks are included in the *Phase II Comprehensive Site Assessment* Report (GZA 2022b; Appendix C) and Attachment 1 – Photograph Log.

1.2 Existing Resource Areas

Wetland resource areas potentially impacted by the proposed CRA were delineated based on visual observations during site visits and definitions of resource areas in 310 CMR 10.51 through 10.60 and the City's Wetlands Ordinance. The following inland resource areas are located within the project area (Figure 2):

- Bank
- Land Under Water Bodies and Waterways
- Riverfront Area
- Buffer Zone - Bank

The National Wetlands Inventory classifies this section of the Little River as "R5UBH": Riverine unknown perennial, unconsolidated bottom, permanently flooded (USFWS 2024).

1.3 Massachusetts Contingency Plan Response Actions

During a site assessment for a planned real estate transaction in November 2014, certain constituents were reported in soil and groundwater samples at concentrations exceeding the MCP reportable concentrations. The owner of the property (Haffner's) notified MassDEP regarding this finding in March 2015 and RTN 3-32792 was assigned. During assessment of this RTN in May 2015, Haffner's consultant (Ramboll) noted a sheen on the Little River that appeared to be emanating from the Property. An additional notification to MassDEP was made and an additional RTN (3-32875) was assigned. Immediate Response Action (IRA) activities were initiated in May 2015 in response to this finding which included gauging and recovery of NAPL in Site monitoring wells and installation of absorbent booms in the Little River. A semi-permanent boom system was installed within the River in November 2016 and has been maintained through the present under the IRA.

Ramboll completed a Phase I Initial Site Investigation on behalf of Haffner's in April 2016 for RTNs 3-32792 and 3-32875 and continued IRA activities through October 2019. The Phase II work required under the MCP was not completed by the specified deadline; as a result, MassDEP issued a Notice of Noncompliance. National Grid assumed responsibility for the MCP response actions for the two RTNs in November 2019 with the filing of a Tier Classification transfer. National Grid and MassDEP signed an Administrative Consent Order in October 2020 which established a deadline of April 6, 2022 for submittal of the Phase II report. The Phase II was submitted by the relevant deadline and a Phase III

Remedial Action Plan (RAP) was then submitted in July 2022. The CRA selected to achieve a Permanent Solution under the July 2022 Phase III RAP included relocation of an electrical line in the upland portion of the Site (to address potential risks to emergency utility workers) and partial dredging and capping of sediments within the Little River to address the presence of visible oil and/or tar (VOT) which resulted in a condition of Readily Apparent Harm. Remedial design studies were initiated following submittal of the Phase III RAP.

Based on initial Phase IV design investigations, Anchor QEA identified benzene in sediment porewater as a potential risk to aquatic receptors in the Little River which could not be readily addressed feasibly by the selected remedy (dredging and capping of impacted sediments). Observed porewater concentrations and the estimated flux of benzene migrating from the upland portion of the Site to the Little River sediments in the central portion of the Site would require a cap of substantial thickness to reduce the levels in shallow sediment to below risk-based concentrations. Due to the uncertainty associated with the retaining wall construction details and the expected requirement to maintain sediment surface elevations within the river, construction of a cap that would effectively address the benzene migration was deemed to be infeasible. Accordingly, a supplemental evaluation of upland groundwater and in-river porewater conditions was initiated with the goal of developing a remedial approach that would substantially reduce benzene flux to the Little River. A summary of the results of the additional investigation results, a re-evaluation of remedial technologies and alternatives, and preliminary design details for the selected remedial alternatives is presented in the *Phase III Remedial Action Plan & Phase IV Remedy Implementation Plan* (GZA 2024).

Potential sources of OHM to the Site include the former MGP, the use of the upland as a gasoline and fuel oil distribution facility since 1977, general historical industrial and commercial uses of the Little River, storm drains, nearby roadways, and discharges from combined sewer outfalls.

1.4 Proposed Project Description

1.4.1 Upland

Air sparging/soil vapor extraction (AS/SVE) has been selected as a technically and economically feasible component of the CRA to achieve a Permanent Solution at the 284 Winter Street Site. AS/SVE is a combined in situ physical treatment technology that is fully developed and widely utilized to remediate volatile compounds in saturated and unsaturated zone soil and groundwater. AS requires the installation of air injection wells extending below the water table to inject air below the impacted groundwater zone, following which the SVE system applies a vacuum to wells screened in the unsaturated zone to capture the resulting vapors. The volatile compounds captured by the SVE system are treated via vapor-phase granular activated carbon (VGAC) adsorption prior to atmospheric discharge. In addition to removing constituents via volatilization, an AS/SVE system can

also promote biodegradation (i.e., "bioventing") by stimulating indigenous bacterial growth and associated aerobic biodegradation through the introduction of oxygen into the subsurface.

GZA evaluated the potential applicability of AS/SVE to remediate benzene and other volatile MGP compounds in soil and groundwater at the Site through the performance of a pilot study in April 2024. GZA performed the pilot test as a modification to the existing IRA Plan and outlined the pilot work in a combined IRA Status Report and Plan Modification dated March 11, 2024. The pilot test confirmed the effectiveness of the technology and provided information on design details.

The design for the remedial system is based on data collected during the pilot study. Due to the observed impacts on the Little River during the pilot testing, the AS/SVE system will be implemented in phases with enhanced monitoring and contingency plans for mitigation of effects on the river. The general system design includes the installation of nine AS wells and eleven SVE wells, to be installed within the target remedial zone at the approximate locations shown on Figure 3. These totals include the existing AS and SVE wells (AS-1 and SVE-1). Note that the precise number and location of the AS and SVE wells to be installed will be based on actual subsurface conditions encountered and may vary from the plans included with this submittal. The SVE wells and a subset of primary AS wells will be installed initially along with the required piping and a number of spare lines to accommodate potential future system expansion or modification. The piping will also allow for the incorporation of automated NAPL recovery, if warranted. Each well will be piped underground to an aboveground manifold (details for the AS/SVE piping trenches and connections are shown on a plan excerpted from the June 2024 Revised Phase III/Phase IV Report, which is included as Attachment 2 to this narrative). The SVE and subgrade AS piping and fittings will be constructed of rigid Schedule 40 PVC. Piping will be installed in trenches excavated to approximately 4 feet below the ground surface (Figure 3). The aboveground AS piping and fittings will be constructed of IPEX Duraplus™ Air-Line Acrylonitrile Butadiene Styrene pipe or an approved equivalent material, which is resistant to shattering under pressure.

At the time of AS/SVE piping installation, the electrical line currently running through the former holder will be rerouted. A new electrical handhole will be installed in the landscaped area at the southwestern corner of the car wash building and a shallow trench excavated to the southeastern corner of the building, as shown on Figure 3. The line would then be routed through the car wash building to the existing feed on the western side of the building.

In addition to the AS/SVE piping installation, two shallow (2 to 4 feet deep) excavations will be completed near the southeast corner of the gas station pump islands. A small quantity (estimated to be less than 50 cubic yards) of hardened coal tar and MGP purifier box wastes is proposed for removal to address MCP requirements that recently became effective in March 2024. Following the completion of trenching/excavation activities, the trenches/excavations will be backfilled with borrow

from off-site and non-impacted reuse material and then paved with new asphalt to match existing grade.

The AS/SVE piping manifold will be connected to an AS/SVE treatment system located adjacent to the southwestern corner of the car wash building (Note that National Grid will coordinate the location of the treatment system with the property owner and it is subject to change.). The treatment system will be fabricated as a pre-packaged turnkey system and will consist of a cargo box housing the SVE blower, AS compressor, VGAC vessels and their associated components. The treatment system is equipped with an emergency stop switch to immediately shut down all components if needed. The cargo box will be insulated and finished with heat, lighting, ventilation, and sound attenuation.

During AS/SVE system installation, small quantities of soil will be generated during trenching for sub-surface piping and will be temporarily stockpiled or placed in roll-off containers pending off-Site disposal. The stockpile(s) will be placed on polyethylene sheeting and will be covered with polyethylene sheeting, secured with sandbags or other measures to prevent exposure to wind and precipitation. It is anticipated that the stockpiled soil will be shipped off-Site under a bill-of-lading to a thermal processing facility such as the Clean Earth thermal treatment facility in Loudon, New Hampshire. Asphalt, brick, and concrete material generated during the work will be segregated from the soil and properly recycled at an appropriately permitted off-Site facility.

The plan for the AS/SVE implementation calls for the SVE wells to be activated first, followed by sequential startup of the AS wells. Conditions within the Little River will be closely monitored following activation of the AS wells. Once the system has been started up, AS/SVE operation will result in the generation of vapor phase OHM, which will be captured via the SVE system and sent to the VGAC vessels for treatment by absorption. Spent VGAC will be transported to licensed facilities for regeneration or incineration. The primary remediation waste stream (other than spent VGAC) that will be generated during the system operation will be condensed moisture associated with the SVE system. To manage this condensate, the specifications require that the SVE piping be installed either level or sloping back toward the SVE wells. Condensate that does not return to the wells will be collected in the vapor-liquid separator tank (i.e., knockout tank) and will be handled in accordance with relevant MCP requirements.

Installation of the AS/SVE system will be described in a Phase IV Final Inspection Report (FIR) submitted by National Grid to MassDEP, and operation, maintenance and monitoring (OMM) of the system will be described in semi-annual status reports.

1.4.2 Little River

The objective of placing a temporary cap within a portion of the licensed semi-permanent boom system within the Little River is to provide additional management of sheens and possible air emissions from the upland air sparging system. The temporary cap includes the placement of (from bottom up): a reactive core mat containing organoclay attached to a 6-inch armor layer composed of stone contained within geotextile (i.e., armor mattress; Figure 4). The reactive core mat will reduce the generation of sheens on surface water in the river by sorbing non-aqueous phase liquid before it is released to the water column. The organoclay will also absorb organics within air bubbles that may be generated by the air sparging system, to some extent. NAPL absorption by the core mat will help to extend the service life of the sorbent booms of the semi-permanent boom system and reduce the appearance of sheens on surface water. Placement of the temporary cap is proposed along an approximately 275-ft linear stretch of the river, and the footprint will be limited to the footprint of the semi-permanent boom system licensed under a prior Chapter 91 filing. The proposed width of the temporary cap ranges from 5 to 10 feet.

A Time of Year restriction established by the Massachusetts Division of Marine Fisheries for the adjacent Little River dam removal project being conducted by the City of Haverhill restricts in-river activities between March 1 and June 30 (inclusive). Temporary cap placement is anticipated to be conducted prior to March 1 in late 2024/early 2025.

Prior to placement, vegetation overgrowth on the face and base of the retaining wall will be removed to facilitate temporary cap placement. Sorbent booms will be installed to manage sheens that may be generated during debris removal and temporary cap placement activities; additional sorbent booms may be installed along the semi-permanent boom system and/or perpendicular to the river downstream of the proposed work area within the river. Debris present within the proposed temporary cap footprint will be removed to provide a smoother surface on which to place the armor mattresses. The armor mattresses will be placed with a crane located on the upland portion of the Site. Following the completion of temporary cap placement, new sorbent booms will be installed within the semi-permanent boom system. Vegetation, debris, and general trash will be disposed of at an approved facility(ies).

Removal of debris and placement of the temporary cap is anticipated to have minimal impact on the disturbance of the sediment surface, because sediment removal activities are not being conducted. Therefore, minimal turbidity generation is anticipated. While sheen management will be conducted as part of the temporary cap placement activities (because generation of sheen on surface water occurs in the absence of in-river activities), turbidity management and/or monitoring is not proposed.

Stockpiling of materials in the upland is anticipated to be minimal. Armor mattresses will be constructed offsite and trucked to the Site for placement in the river. Armor mattresses will be transported on a daily basis with only enough mattresses transported to the Site for placement during that day's activities. Removed vegetation and debris from the river may be temporarily stockpiled onsite (likely in containers) prior to transport offsite for disposal. Temporary cap placement activities are anticipated to be completed within one month.

The placement of the temporary cap within the semi-permanent boom system is intended to be a temporary measure to manage sheen generation until a larger remediation project within the river is implemented. The proposed full-scale remediation project currently includes a combination of dredging and sediment capping to partially remove and manage OHM impacts to sediment within the Little River. The full-scale remediation project is currently in design, with implementation anticipated in summer 2026.

1.4.3 Relationship to Existing Activities or Operations

The 284 Winter Street property is an active gasoline fueling station and car wash owned by an entity other than National Grid, and National Grid's intent is to allow these operations to continue during the remedial work, to the extent feasible. The remedial contractor will be required to confine operations to designated areas, with temporary fencing delineating the work boundaries. Specific traffic and parking patterns will be established to limit interference with facility operations. Temporary closures of the car wash access lane will be required for installation of AS and SVE wells and associated piping. These will be communicated to the property owner in advance and coordinated with on-site personnel.

Work will generally be conducted on weekdays during normal business hours. Any temporary deactivation of electrical service, which may be required to connect the AS/SVE system to site power, will be coordinated with property owner facilities representatives, with work conducted outside business hours, if necessary, to limit impacts to site activities. Throughout the AS/SVE work, access will be available to the fueling area at the Property.

1.4.4 Potential Impacts to Local Infrastructure and River Use

The primary short-term impact to local infrastructure is associated with the transport of equipment and materials to and from the Site. Removed vegetation, debris, and excavated soil will be transported off site via truck, and AS/SVE equipment and clean temporary cap materials will be transported on site via truck. Alternative transportation methods such as rail or water transport are not viable options due to the location of the Site. It is not anticipated that street closures will be necessary to implement the proposed work. No long-term impacts are anticipated.

The remedial work is not anticipated to impact drainage features with the exception of well and piping installation activities in the vicinity of on-Site catch basin CB-2, which are expected to be of short duration. The catch basin inlet will be protected with erosion controls during this work (Figure 3).

Access to the Little River will not be available during construction, but this is not anticipated to be a significant impact because there is currently no or limited use of the Little River adjacent to the Site due to access constraints (i.e., upstream Little River dam, downstream Little River conduit, and no public access location to the river). No long-term impacts are anticipated.

1.4.5 Potential Impacts to Resource Areas

Temporary impacts to resource areas are possible with the implementation of the proposed CRA. The proposed work will temporarily impact Land Under Waterbodies and Waterways, Riverfront Area, and Bank buffer zone resource areas. No impacts to the Bank (i.e., vertical manmade retaining wall) are anticipated. Impacts to resource areas will be avoided or mitigated to the extent feasible. Best management practices (BMPs) used to limit impacts are described in Section 1.6. Figures 3 and 4 show the Upland and Sediment Remediation Plans, respectively. A description of potential impacts to resource areas are summarized in Table 1.

Table 1
Potential Impacts to Resource Areas

CRA Construction Activity	Description	Potentially Impacted Resource Area(s)	Approximate Resource Area(s) Size (acres/feet)	Type of Potential Impact to Resource Area(s)
Air Sparge and Soil Vapor Extraction	• Installation of AS/SVE system, including associated piping • Injecting air into subsurface and extracting vapors from groundwater and soil • Limited excavation in the upland to remove visible coal tar deposits	Riverfront Area Bank Buffer Zone	0.34 acres	• Temporary impacts to resource areas, including potential generation of soil erosion during excavation and from stockpiles. The potential for soil erosion will be addressed using BMPs. • The majority of the upland portion of the Site is paved. Pavement will be replaced and the Site returned to existing conditions following construction.
Placement of a temporary cap in a portion of the Little River	• Installation of an approximately 2,175 square foot temporary cap composed of reactive core mat and armor mattresses on the existing sediment surface within the Little River	Land Under Water Bodies and Waterways	2,175 square feet	• Temporary impacts to resource area(s), including short-term loss of benthic habitat due to cap placement and potential generation of sheens, are anticipated within the work area. • The loss of benthic habitat will be temporary. • The potential generation of sheens will be limited to the period when cap placement activities are occurring and will be addressed using BMPs.
		Bank	275 linear feet	• No impacts anticipated.
		Riverfront Area Bank Buffer Zone	0 acres	• No impacts anticipated.

1.5 Alternatives Analysis

Section 310 CMR 10.53(3)(q) of the WPA requires an Alternatives Analysis that includes a baseline alternative that does not alter resource areas, and an assessment of alternatives to both temporary and permanent impacts to resource areas. The WPA further states that a CRA that has been selected in accordance with the provisions of 310 CMR 40.0851 through 40.0869 shall be deemed to have met these requirements. The Project is a CRA that has been selected in accordance with 310 CMR 40.0851 through 40.0869 of the MCP, and therefore a detailed Alternatives Analysis is not required as part of this submittal. Instead, a brief summary of the alternatives reviewed as part of the MCP process is provided below to provide context for review of the NOI.

1.5.1 Upland

An initial screening of remedial technologies to address contaminated media in the upland portion of the Site was presented in the *Phase III Remedial Action Plan* (GZA 2022a). At that time upland impacts that needed to be addressed included OHM-impacted soil and a limited utility relocation alternative was selected. The Phase III RAP included a baseline "No Further Action" alternative that served as a baseline against which other remedial technologies could be compared. It also considered alternatives that would have no impacts on the resource areas, such as an AUL (deed restriction) and natural attenuation but concluded that such alternatives could not be used on a stand-alone basis to achieve a condition of No Significant Risk (NSR) to human and environmental receptors in the foreseeable future. Following the collection and review of additional Site data and the resulting implications to sediment cap thickness and percent amendment, it was concluded that management of impacted Site groundwater was required to support the reduction of OHM concentrations in porewater in sediment within the Little River. Remedial technologies were revisited in the *Revised Phase III Remedial Action Plan & Phase IV Remedy Implementation Plan* (GZA 2024). Revisited technologies included: vertical barriers, groundwater extraction and treatment, AS/SVE, in situ chemical oxidation, permeable reactive barrier, and in situ stabilization and solidification.

In most cases, the initial screening of remedial action alternatives (RAA) must be followed by a detailed evaluation using specific criteria established by the MCP (at 310 CMR 40.0858). However, Section 310 CMR 40.0857(2) provides an exemption from a detailed evaluation in those cases where an RAA identified during the initial screening meets the following criteria:

a) is proven to be effective in remediating the types of oil and hazardous material present at the disposal site, based upon experience gained at other disposal sites with similar site and contaminant conditions;

b) results in the reuse, recycling, destruction, detoxification, treatment or any combination thereof of the OHM present at the disposal site;

c) can be implemented in a manner that will not pose a significant risk of harm to health, safety, public welfare or the environment, as described in 310 CMR 40.0900; and

d) is likely to result in the reduction and/or control of oil and/or hazardous material at the disposal site to a degree and in a manner such that the requirements of a Permanent Solution as set forth in 310 CMR 40.1000 will be met.

AS/SVE is effective at remediating volatile organic compounds in the saturated and unsaturated zones. The site-specific effectiveness of this technology has been documented by the successful implementation of an AS/SVE pilot study, and the process will result in the destruction of OHM (assuming regeneration or incineration of the spent VGAC). The planned implementation details and monitoring will allow for AS/SVE to be implemented without significant risk of harm to health, safety, or public welfare. Due to the potential for discharges of sparged air to the Little River, the potential impacts on the environment from an AS/SVE system would need to be carefully monitored and mitigated, as appropriate. The anticipated end result for an AS/SVE remedy would be reduction of benzene concentrations such that the MCP criteria for a Permanent Solution can be achieved for the Little River. In summary, AS/SVE can be implemented to meet the criteria listed above, and therefore no further detailed evaluation of RAAs is required.

Although a detailed alternatives analysis was not conducted, none of the other remedial alternatives that were initially considered would be less damaging than the selected RAA to jurisdictional resource areas. A no action alternative was not considered a feasible alternative due to the implications to the feasibility of implementing an effective remedial alternative in the Little River.

1.5.2 Little River

The temporary cap is being installed to supplement the Chapter 91 licensed semi-permanent boom system and mitigate the appearance of sheens on the surface water in the Little River. No other options are available to supplement the existing semi-permanent boom system to support the management of sheens. To avoid or minimize impacts to aquatic resources, in-water work will be performed in accordance with the fisheries-related work window identified by the Massachusetts Division of Marine Fisheries (DMF) for the upstream Little River dam removal project (July 1 through February 28, inclusive) and will employ BMPs discussed in Section 1.6 below throughout implementation.

1.6 Mitigation and Best Management Practices

Remedial activities proposed at the Site include the installation of an AS/SVE system, limited excavation of visible coal tar deposits, and the installation of a temporary cap within a portion of the Little River. The activities impact Land Under Waterways and Waterbodies, Riverfront Area, and Bank buffer zone. BMPs and environmental controls will be used to limit these potential impacts to

resource areas during construction activities as described in this section. Environmental monitoring will be conducted during construction to identify and evaluate potential environmental impacts; this monitoring will allow for timely intervention and mitigation, if necessary.

The BMPs are summarized in Sections 1.6.1 through 1.6.5 for upland and in-river activities.

1.6.1 Spill Control

Fluids generated during the remediation are anticipated to be limited to drilling water generated during AS well installations and decontamination water (drill rigs and excavation equipment). These liquids will be stored in 55-gallon drums with appropriate secondary containment within upland areas. Soil generated during drilling and excavation activities will either be stored in 55-gallon drums or staged within small lined and covered stockpiles. Stored soils will be covered to minimize rainwater infiltration and stockpile areas will be bermed to allow for the collection and proper handling of accumulated water from rain events and prevent uncontrolled discharges of water and sediment from the storage areas.

A supply of containment products, including oil-sorbent pads and granular absorbent, will be maintained at the Site to facilitate spill cleanup. In the event of a spill or release, the release area will be contained and spilled fluids will be absorbed or otherwise collected. Used absorbent materials will be properly staged in containers or on an impermeable surface separate from clean materials. The impacted materials will be covered (as necessary), labeled as a separate waste stream, tested for disposal requirements, and disposed of off Site in accordance with relevant regulatory requirements.

1.6.2 Erosion and Sedimentation Controls

Erosion and sedimentation controls will be installed, at a minimum, at the downgradient perimeter of the Limits of Work in the upland area, with additional controls installed as necessary to limit runoff. The upland erosion controls will be installed to reduce the potential for soil and sediment originating from the Project area to migrate to resource areas outside of the Limits of Work via runoff. Erosion controls will include silt fencing and staked wattles in unpaved areas, and straw bales in paved areas. Details of these installations are shown on Figure 6. These controls will be installed prior to the initiation of subsurface excavation work and will not be removed until the excavations have been backfilled, soil stockpiles have been removed from the Site, and the pavement has been restored.

In addition to the perimeter erosion controls, additional measures will be implemented at the catch basins located within the Project limits. At a minimum, silt sacks will be placed in the catch basin and straw bales will be placed around the perimeter.

In addition, stockpiles will be placed on polyethylene sheeting and covered with stockpile covers that are secured with sandbags or equivalent weights and a grid of ropes. Roll-off containers will be lined

and covered to prevent rainwater infiltration and leakage from the units. Erosion and sedimentation controls will be inspected on a daily basis and maintenance/repairs or replacement completed as necessary.

Construction BMPs will also include fugitive dust emission controls through air monitoring for particulates, established action levels, engineering controls such as stockpile covering when not in active use, dust suppression, and sweeping the Site as needed. The use of work stoppages or pauses during periods of increased winds or shifting site work to activities that are less likely to produce increased fugitive dust emissions will also help limit dust emissions during construction if windy weather occurs.

BMPs for soil management will include the use of temporary covers when stockpiles are not in active use and the use of erosion controls around the perimeter of the soil/stockpile management areas to minimize erosion and silt transport during any storm events. Stockpile covers will extend beyond the edges of the storage area to direct precipitation away from the stockpiles and limit erosion potential. Daily inspection of stockpiles and roll-offs and replacement of liners and covers as appropriate will be incorporated into worksite procedures

1.6.3 Sheen Control During Temporary Cap Placement

Based on Site experience, sheens will likely be generated during temporary cap placement activities. Therefore, sheen and floating oil control measures will be implemented during construction. The following products have been effective in containing and addressing sheens and floating oil:

- Oil containment booms: These booms provide a flexible floating barrier and are used to contain and clean up oil spills. Oil containment booms provide an effective and efficient option for controlling the migration of sheens and floating oil.
- Oil snare booms: These booms are specifically designed to control viscous oil, and their effectiveness has been demonstrated at other sites impacted with oil/tar. The boom includes a rope to which hydrophobic/oleophilic streaming fibers that collect the viscous oil are tied.
- Surface oil sorbent fabric: These sheets of oil absorbent material can be placed on the surface of the water to absorb sheens.

Prior to the start of in-water activities, additional sorbent booms will be installed.

As discussed previously, generation of turbidity is anticipated to be minimal during the placement of the temporary cap due to the limited sediment disturbance. Therefore, turbidity management is not required.

1.6.4 Air Monitoring

During soil excavation and material management activities, airborne dust, organic vapors, and odors may be generated. Ambient air will be monitored throughout the duration of the remediation project in accordance with standard health and safety practices, including the following:

- Air in the work area will be monitored for volatile organic compounds (VOCs) and particulates in accordance with the Health and Safety Plan.
- Perimeter air monitoring for VOCs will be performed using a photoionization detector.
- If necessary, air environmental controls may include applying a foam to control odors. Adjustments to the control measures will be made, if necessary, based on the results of the air monitoring and the observed effectiveness of the controls and weather conditions (e.g., high winds).

1.6.5 Decontamination

The contractor will be required to decontaminate any equipment or vehicles that come in contact with impacted soil or fill materials during the remediation work to preclude the potential transfer of COCs to areas that are not impacted. Vehicles and equipment exiting work zones where contact with impacted materials has occurred will be decontaminated to remove visible soil, sediment or residuals.

2 Achieving Resource Area Performance Standards

For ease of reference, applicable performance standards are listed in the following subsections in italics, followed by an explanation of the project design and construction elements intended to meet the performance standards (as applicable). As discussed in Section 2.1, the proposed project meets the definition of a Limited Project; as a Limited Project, the resource area performance standards are not all applicable but are addressed here to show observance of the standards.

2.1 Limited Project

In accordance with 310 CMR 10.53(3)(q), the proposed project meets the definition of a Limited Project:

Notwithstanding the provisions of 310 CMR 10.54 through 10.58 and 10.60, the Issuing Authority may issue an Order of Conditions and impose such conditions as will contribute to the interests identified in M.G.L. c. 131, § 40 permitting the following limited projects (although no such project may be permitted which will have any adverse effect on specified habitat sites of Rare Species, as identified by procedures established under 310 CMR 10.59). ….: Assessment, monitoring, containment, mitigation, and remediation of, or other response to, a release or threat of release of oil and/or hazardous material in accordance with the provisions of 310 CMR 40.0000: Massachusetts Contingency Plan and the following general conditions (although no such measure may be permitted which is designed in accordance with the provisions of 310 CMR 40.1020: Background Levels of Oil and Hazardous Material solely to reduce contamination to a level lower than that which is needed to achieve "No Significant Risk" as defined in 310 CMR 40.0006[12])

Performance standards for a Limited Project are as follows:

Performance Standards for a Limited Project	
Standard Reference	**Response**
310 CMR 10.53(3)(q)1 *There are no practicable alternatives to the response action being proposed that are consistent with the provisions of 310 CMR 40.0000: Massachusetts Contingency Plan and that would be less damaging to resource areas. The alternatives analysis shall include, at a minimum, the following:* *a. an alternative that does not alter resource areas, which will provide baseline data for evaluating other alternatives; and* *b. an assessment of alternatives to both temporary and permanent impacts to resource areas.* *A "Comprehensive Remedial Action Alternative" that is selected in accordance with the provisions of 310 CMR 40.0851 through 40.0869 shall be deemed to have met the requirements of 310 CMR 10.53(3)*(q)*1.; and*	The proposed CRA was selected in accordance with the requirements of the MCP, specifically 310 CMR 40.0850 through 40.0859. Section 1.5 of this narrative presents a summary of the detailed alternatives analysis, including a "no action" alternative, performed to assess whether alternative remedial approaches would satisfy the project's purpose with less activity or impact within jurisdictional resource areas.

Performance Standards for a Limited Project	
Standard Reference	**Response**
310 CMR 10.53(3)(q)2 *Such projects shall be designed, constructed, implemented, operated, and maintained to avoid or, where avoidance is not practicable, to minimize impacts to resource areas, and shall meet the following standards to the maximum extent practicable:* *a. hydrological changes to resource areas shall be minimized;*	Hydrological changes to resource areas are not expected. There are no temporary or permanent alterations that would impact resource area hydrology.
b. best management practices shall be used to minimize adverse impacts during construction, including prevention of erosion and siltation of adjacent water bodies and wetlands in accordance with standard U.S.D.A. Soil Conservation Service methods;	Erosion and sedimentation controls will include the use of BMPs such as straw wattles and a combination of silt socks and straw bales. Stockpiles will be placed on polyethylene sheeting and covered. Section 1.6 provides a summary of BMPs that will be implemented.
c. mitigating measures shall be implemented that contribute to the protection of the interests identified in M.G.L. c. 131, § 40;	Section 1.6 provides a detailed description of proposed mitigation measures. Mitigating measures are expected to protect the interests specified in the Wetlands Protection Act.
d. compensatory storage shall be provided in accordance with the standards of 310 CMR 10.57(4)(a)1. for all flood storage volume that will be lost;	Placement of the temporary cap within the Little River is anticipated to have minimal to no impact on flood storage volume. Hydraulic conditions within the Little River are governed by the Winter Street bridge and Little River conduit.
e. no access road, assessment or monitoring device, or other structure or activity shall restrict flows so as to cause an increase in flood stage or velocity;	None of the proposed activities is expected to cause an increase in flood stage or velocity.
f. temporary structures and work areas in resource areas, such as access roads and assessment and monitoring devices, shall be removed within 30 days of completion of the work. Temporary alterations to resource areas shall be substantially restored to preexisting hydrology and topography. At least 75% of the surface of any area of disturbed vegetation shall be reestablished with indigenous wetland plant species within two growing seasons and prior to said vegetative reestablishment any exposed soil in the area of disturbed vegetation shall be temporarily stabilized to prevent erosion in accordance with standard U.S.D.A. Soil Conservation Service methods. Temporary structures, work areas, and alterations to resource areas are those that no longer are necessary to fulfill the requirements of 310 CMR 40.0000	Within 30 days of the completion of construction, work areas will be restored to existing conditions. No impact to vegetated areas is anticipated as part of the water-based activities.
g. work in resource areas shall occur only when the ground is sufficiently frozen, dry, or otherwise stable to support the equipment being used.	Equipment will be operating in upland areas that are currently paved.

2.2 Bank

Although this is a limited project subject to the provisions of 310 CMR 10.53(3)(q), it nonetheless meets the performance standards for Bank at 310 CMR 10.54.

Banks are located on both the western and eastern sides of the Little River. The western Bank is a combination of retaining walls, remnant stone structures, and heavily vegetated slope. The majority of the eastern Bank is composed of a manmade, vertical retaining wall 15 to 20-feet tall composed of a combination of stone, brick, and concrete. The project area is located adjacent to the eastern Bank of the Little River. No impacts or modifications to the bank (i.e., vertical retaining wall) are anticipated; therefore, the Performance Standards for the Bank will be met.

2.3 Land Under Water Bodies and Waterways

Although this is a limited project subject to the provisions of 310 CMR 10. 53(3)(q), it nonetheless meets the performance standards for Land Under Waterbodies and Waterways.

Performance Standards for Land Under Water Bodies and Waterways	
Standard Reference	**Response**
310 CMR 10.56(4)(a) *Where the presumption set forth in 310 CMR 10.56(3) is not overcome, any proposed work within Land under Water Bodies and Waterways shall not impair the following:* *1. The water carrying capacity within the defined channel, which is provided by said land in conjunction with the banks;* *2. Ground and surface water quality;* *3. The capacity of said land to provide breeding habitat, escape cover and food for fisheries; and* *4. The capacity of said land to provide important wildlife habitat functions. A project or projects on a single lot, for which Notice(s) of intent is filed on or after November 1, 1987, that (cumulatively) alter(s) up to 10% or 5,000 square feet (whichever is less) of land in this resource area found to be significant to the protection of wildlife habitat, shall not be deemed to impair its capacity to provide important wildlife habitat functions. Additional alterations beyond the above threshold may be permitted if they will have no adverse effects on wildlife habitat, as determined by procedures established under 310 CMR 10.60.* *5. Work on a stream crossing shall be presumed to meet the performance standard set forth in 310 CMR 10.56(4)(a) provided the work is performed in compliance with the Massachusetts Stream Crossing Standards by consisting of a span or embedded culvert in which, at a minimum, the bottom of a span structure or the upper surface of an embedded culvert is above the elevation of the top of the bank, and the structure spans the channel width by a minimum of 1.2 times the bankfull width. This presumption is*	1) The placement of the temporary cap within the Little River is anticipated to have negligible impact on the water carrying capacity of the river. 2) The placement of the temporary cap within the semi-permanent boom system footprint will help improve the water quality by reducing the generation of sheens on surface water in the river by sorbing non-aqueous phase liquid before it is released to the water column. 3) The placement of the temporary cap within the Little River is limited and not anticipated to impact fish habitat, cover, or food. The size of the stone contained within the geogrid is similar to existing material within the river. 4) The placement of the temporary cap is not anticipated to impact wildlife habitat function. 5) This standard is not applicable to this project. The project does not include a stream crossing.

Performance Standards for Land Under Water Bodies and Waterways	
Standard Reference	**Response**
rebuttable and may be overcome by the submittal of credible evidence from a competent source. Notwithstanding the requirements of 310 CMR 10.56(4)(a)4., the impact on Land under Water Bodies and Waterways caused by the installation of a stream crossing is exempt from the requirement to perform a habitat evaluation in accordance with the procedures established under 310 CMR 10.60.	
310 CMR 10.56(4)(b) *Notwithstanding the provisions of 310 CMR 10.56(4)(a), the issuing authority may issue an Order in accordance with M.G.L. c. 131, § 40 to maintain or improve boat channels within Land under Water Bodies and Waterways when said work is designed and carried out using the best practical measures so as to minimize adverse effects such as the suspension or transport of pollutants, increases in turbidity, the smothering of bottom organisms, the accumulation of pollutants by organisms or the destruction of fisheries habitat or nutrient source areas.*	The portion of the Little River within the Site is not accessible to boating due to the presence of the Little River dam (upstream), the Little River conduit (downstream), and no public access to the river. As discussed in Section 1.6, appropriate BMPs will be implemented during installation of the temporary cap to mitigate the presence/generation of sheen on surface water.
310 CMR 10.56(4)(c) *Notwithstanding the provisions of 310 CMR 10.56(4)(a) or (b), no project may be permitted which will have any adverse effect on specified habitat sites of rare vertebrate or invertebrate species, as identified by procedures established under 310 CMR 10.59.*	No rare vertebrate or invertebrates species are located within the project site, therefore 310 CMR 10.56(4)(c) is not applicable.

2.4 Riverfront Area

Although this is a limited project subject to the provisions of 310 CMR 10. 53(3)(q), it nonetheless meets the performance standards for Riverfront Area.

Performance Standards for Riverfront Area	
Standard Reference	**Response**
310 CMR 10.58(4)(a) *Protection of Other Resource Areas. The work shall meet the performance standards for all other resource areas within the Riverfront Area, as identified in 310 CMR 10.30 (Coastal Bank), 10.32 (Salt Marsh), 10.55 (Bordering Vegetated Wetland), and 10.57 (Land Subject to Flooding). When work in the Riverfront Area is also within the Buffer Zone to another resource area, the performance standards for the Riverfront Area shall contribute to the protection of the interests of M.G.L. c. 131, § 40 in lieu of any additional requirements that might otherwise be imposed on work in the Buffer Zone within the Riverfront Area.*	The Riverfront Area at the Site is within the Bank Buffer Zone. Performance standards applicable to this resource area are being met as described below.
310 CMR 10.58(4)(b) *Protection of Rare Species. No project may be permitted within the Riverfront Area which will have any adverse effect on specified habitat sites of rare wetland or upland vertebrate or invertebrate species, as identified by the procedures established under 310 CMR 10.59 or 10.37, or*	This standard is not applicable to this project. There are no rare species present in the area.

Performance Standards for Riverfront Area	
Standard Reference	**Response**
which will have any adverse effect on vernal pool habitat certified prior to the filing of the Notice of Intent.	
310 CMR 10.58(4)(c) *Practicable and Substantially Equivalent Economic Alternatives. There must be no practicable and substantially equivalent economic alternative to the proposed project with less adverse effects on the interests identified in M.G.L. c. 131 § 40.*	As discussed in Section 1.5, the CRA selected for the Site meets MCP requirements for a Permanent Solution and an alternatives analysis was conducted to recommend a viable alternative that met MCP requirements, limited temporary and permanent impacts to resource areas, and was economically feasible. Doing nothing and subsequently having no temporary or permanent affects to resource areas does not satisfy MCP requirements.

2.5 Bank Buffer Zone

Remedial activities are located within the previously developed/disturbed 100-foot Buffer Zones of the Bank. Specifically, the remediation activities will take place in a paved area with landscaping along the western edge of the operating gas station that is located within the buffer zone. Areas situated within WPA Buffer Zones that are located within 25 feet and 50 feet, respectively, of the resource area (in this case the river bank) are designated as "No-Build-No Disturb" and "No Build" zones, respectively, under the City of Haverhill Wetlands Ordinance. At this Site, benzene-impacted groundwater has been detected in monitoring wells within 25 feet of the river bank, and must be reduced to comply with the MCP. Therefore, the AS/SVE wells and the piping to connect them to the treatment system must be situated within these zones.

Buffer Zones do not have performance standards, but narrative standards for work in the Buffer Zones for resource areas are discussed in 310 CMR 10.02. These include: erosion and sedimentation controls during construction, a clear limit of work, and the preservation of natural vegetation.

The Buffer Zone for the Bank is property currently being used as an active gas station and car wash. The majority of the area is currently paved, with limited landscaped areas. Limited natural vegetation is present. Any areas that have been disturbed will be returned to existing conditions following completion of remedial activities.

Remedial activities located within the buffer zone of the Bank are not expected to impact the resource area. The temporary staging and sediment management activities occurring within the buffer zones are temporary activities and land within the buffer zones will be restored following construction. Section 1.6.2 provides details on the erosion controls, such as geotextile barriers and hay bales, which will be installed to limit erosion and siltation on the upland portion of the Site.

Section 1.6.3 provides details on the controls that will be implemented during the sediment-related remedy to limit the impacts upon protected resources. As discussed in Section 1.5, the "no action" alternative is the only alternative that would not involve impacts upon the resource areas and buffer zones. The "no action" alternative was not selected because it would not comply with the MCP directive to achieve a condition of No Significant Risk.

3 Regulatory Compliance

Table 2 shows a summary of permit applications that are anticipated to be submitted to local, state, and federal authorities.

In addition to this filing with the City of Haverhill Conservation Commission, the proposed remediation activities will require the following state and federal approvals.

Table 2
Summary of Required Environmental Permits for Remedial Construction

Permit	Agency	Trigger	Regulation
Chapter 91 Minor Modification	MassDEP: Waterways	Modification to an existing licensed structure	310 CMR 9.05(2)(b)
Self-verification Form	USACE	General Permit 13 – Cleanup of Hazardous and Toxic Waste	33 CFR 322.3(c)(1)

4 References

Fuss & O'Neill, 2021. *Little River Dam Removal Feasibility Study, City of Haverhill, Massachusetts*. Prepared for the City of Haverhill. November 19, 2021.

GZA (GZA GeoEnvironmental, Inc.), 2022a. *Phase III Remedial Action Plan, 284 Winter Street, Haverhill, Massachusetts RTNs 3-32792 and 3-32875.* Prepared for Boston Gas Company d/b/a National Grid. July 2022.

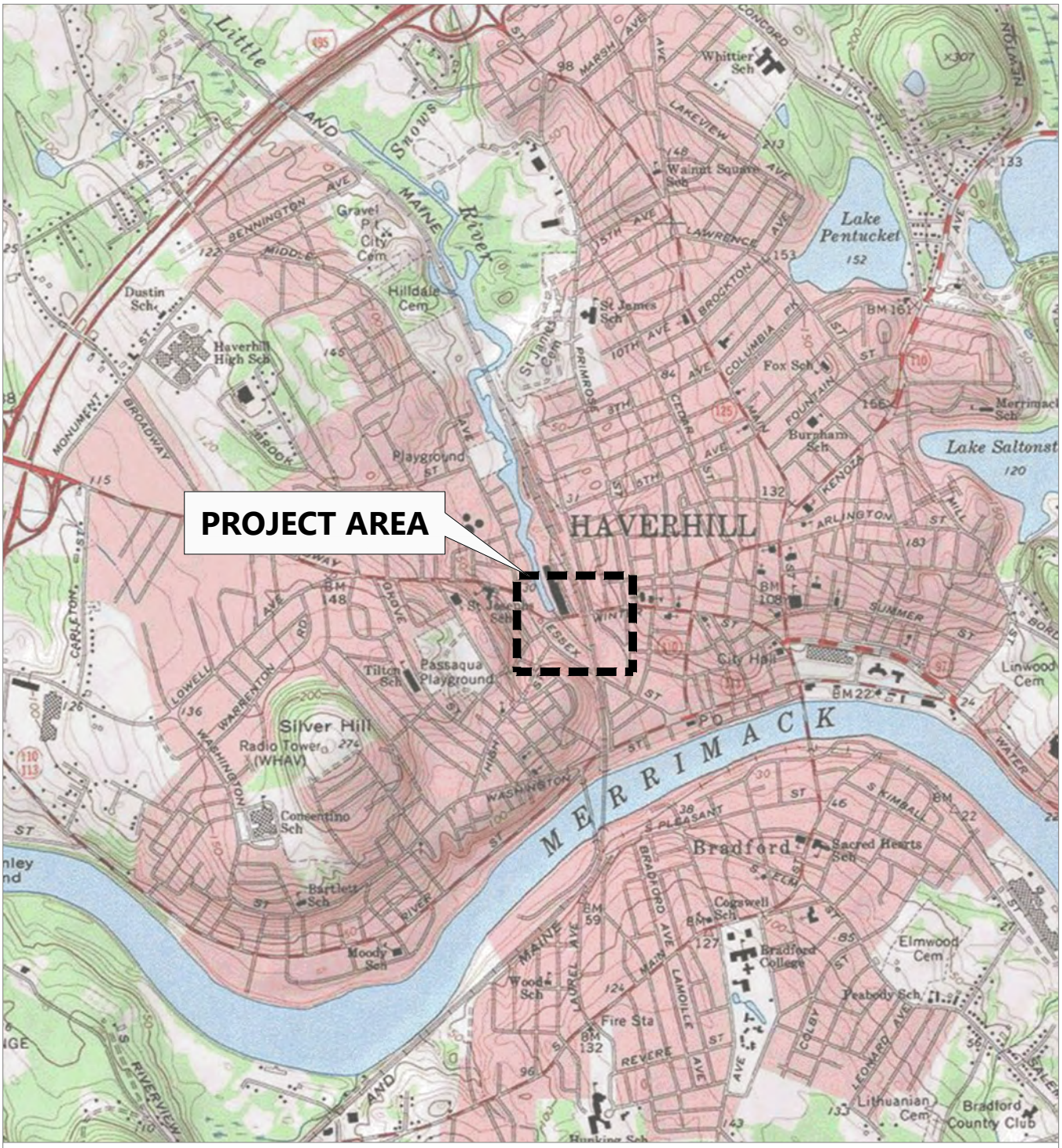
GZA, 2022b. *Phase II Comprehensive Site Assessment Report, 284 Winter Street, Haverhill, Massachusetts RTNs 3-32792 and 3-32875.* Prepared for Boston Gas Company d/b/a National Grid. April 5, 2022. Appendix C – Phase II Comprehensive Site Assessment – Little River.

GZA, 2024. *Revised Phase II Remedial Action Plan & Phase IV Remedy Implementation Plan, 284 Winter Street, Haverhill, Massachusetts RTNs 3-32792 and 3-32875.* Prepared for Boston Gas Company d/b/a National Grid. June 2024.

MassDEP (Massachusetts Department of Environmental Protection), 2023. Massachusetts Contingency Plan (MCP) 310 CMR 40.0000. September 1, 2023 (effective March 1, 2024)

USFWS, 2024. National Wetlands Inventory Mapper. Available at: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

Project Figures



SOURCE IMAGE: Unites States Geological Survey Topographic Map
HORIZONTAL DATUM: NAD83 Massachusetts State Planes, Mainland Zone, NAD83, U.S. Survey Feet
VERTICAL DATUM: NAVD88

LEGEND:

PROJECT LOCATION

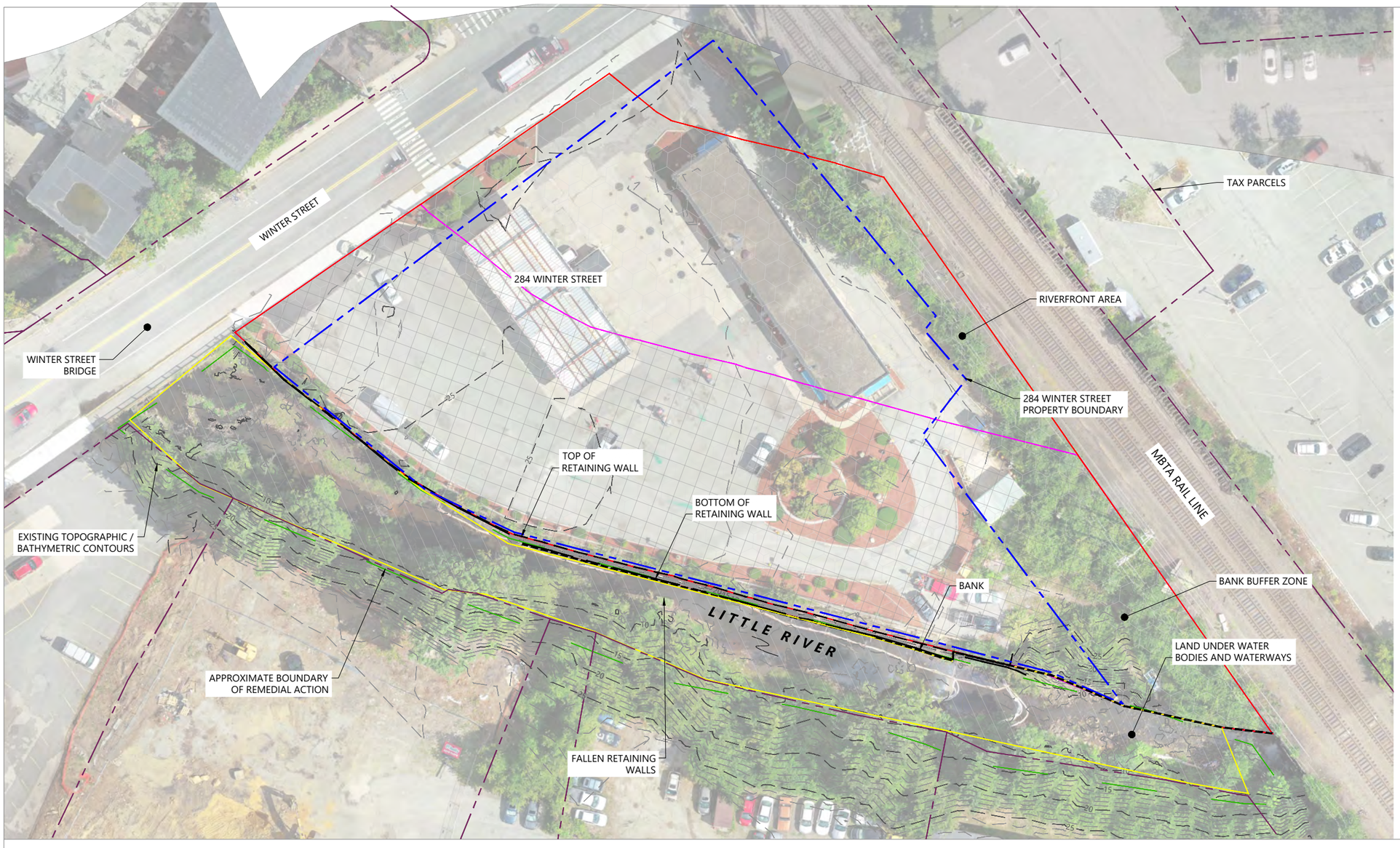
0 2000
Feet

Publish Date: 2024/09/16 12:15 PM | User: dbinkney
Filepath: G:\Projects\0327-National Grid\Haverhill__Notice of Intent Permit\0327-RP-001 USGS Location Map_NOI.dwg FIGURE 1

ANCHOR QEA

FIGURE 1
SITE LOCATION MAP

NOTICE OF INTENT
FORMER HAVERHILL MGP SITE
284 WINTER STREET
HAVERHILL, MA



LEGEND:

- EXISTING TOPOGRAPHIC / BATHYMETRIC CONTOURS (1-FOOT INTERVAL)
- 284 WINTER STREET (HAFFNER'S) PROPERTY BOUNDARY
- TAX PARCELS (MASS GIS)
- TOP OF RETAINING WALL
- BOTTOM OF RETAINING WALL
- APPROXIMATE BOUNDARY OF REMEDIAL ACTION

WETLAND RESOURCE AREAS

- BANK
- LAND UNDER WATERBODIES AND WATERWAYS
- BANK BUFFER ZONE
- RIVERFRONT AREA

TOPOGRAPHIC/BATHYMETRIC SURVEY & AERIAL IMAGE SOURCE: HYDRO DATA, Inc. (September 2022)
HORIZONTAL DATUM: NAD83 Massachusetts State Planes, Mainland Zone (NAD83), U.S. Survey Feet

VERTICAL DATUM: North American Vertical Datum of 1988 (NAVD88)
284 WINTER STREET BOUNDARY: ALTA Survey by MHF Design Consultants (2015).
TAX PARCEL BOUNDARIES: Massachusetts GIS (2023)

WETLAND RESOURCE AREAS: Massachusetts Department of Environmental Protection 310 CMR 10.00 Wetlands Protection Guidance

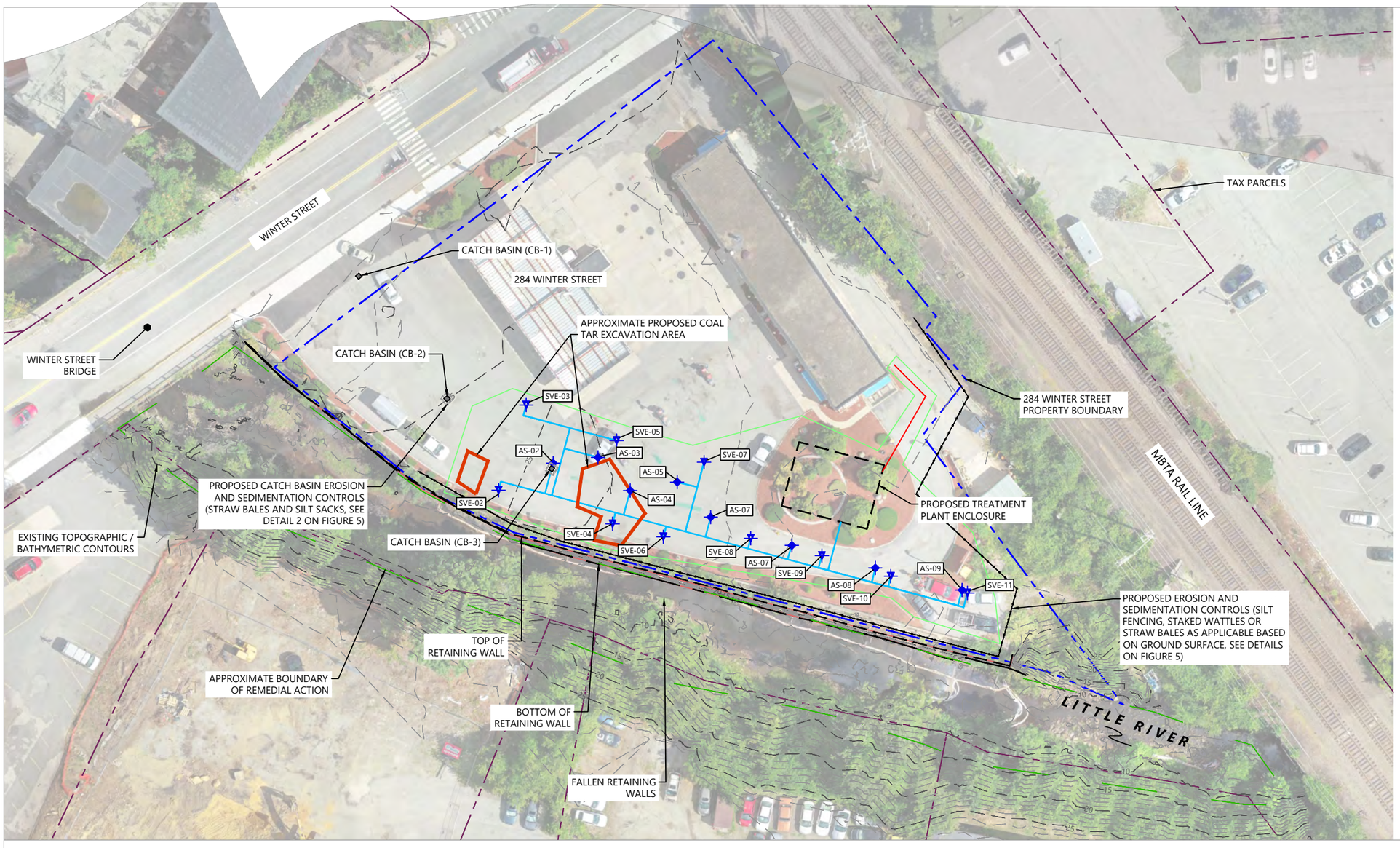
0 50
Feet

Publish Date: 2024/09/16 11:54 AM | User: dbinkney
Filepath: G:\Projects\0327-National Grid\Haverhill_Notice of Intent Permit\0327-PL-002-Existing Conditions Plan-River Area_NOI.dwg FIGURE 2

ANCHOR QEA

FIGURE 2
EXISTING CONDITIONS & RESOURCE AREAS

NOTICE OF INTENT
FORMER HAVERHILL MGP SITE
284 WINTER STREET
HAVERHILL, MA



TOPOGRAPHICAL/BATHMETRIC SURVEY & AERIAL SOURCE: HYDRO DATA, Inc. (September 2022)
HORIZONTAL DATUM: NAD83 Massachusetts State Planes, Mainland Zone (NAD83), U.S. Survey Feet

VERTICAL DATUM: North American Vertical Datum of 1988 (NAVD88)
284 WINTER STREET BOUNDARY: ALTA Survey by MHF Design Consultants (2015).
TAX PARCEL BOUNDARIES

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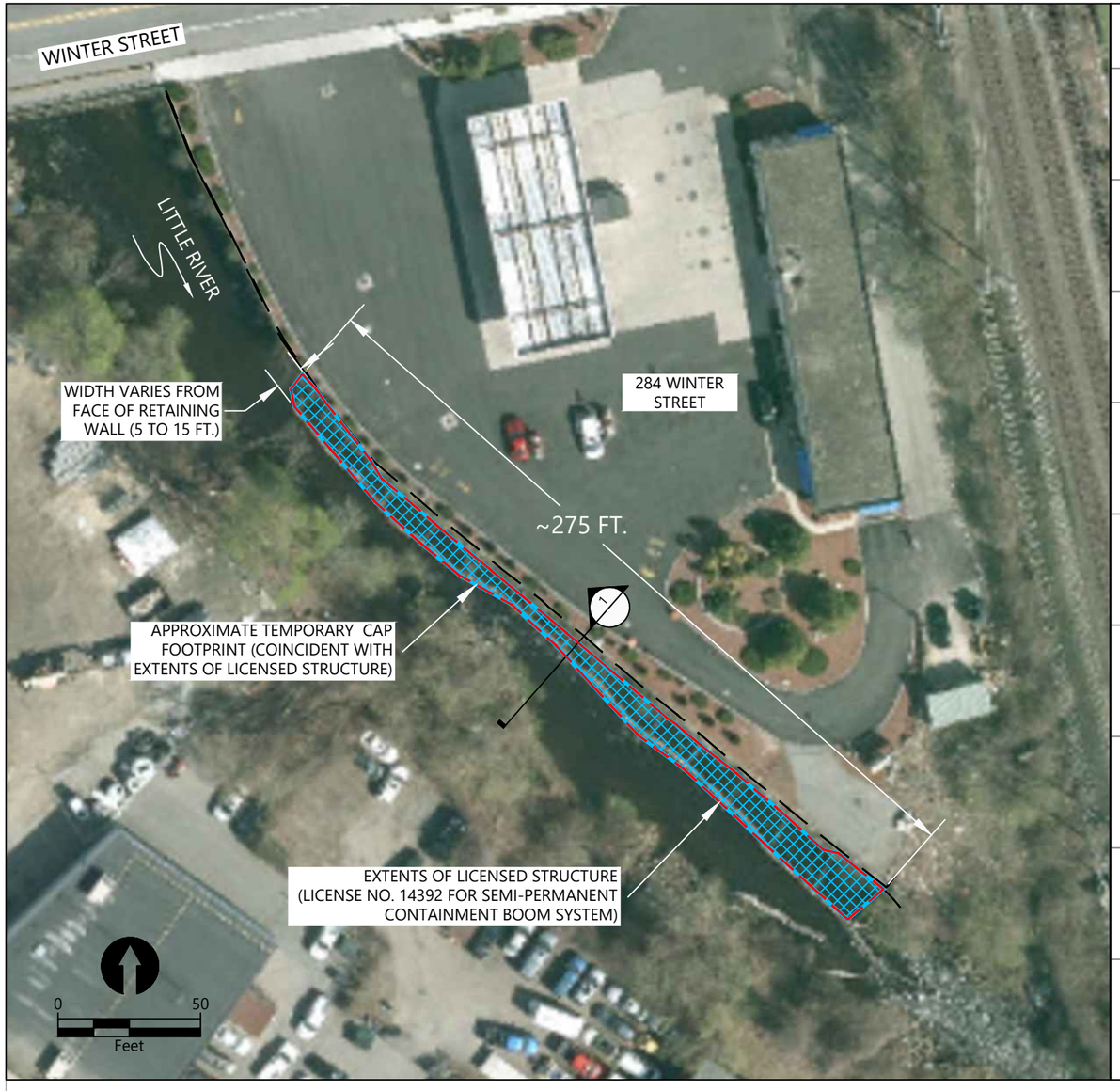
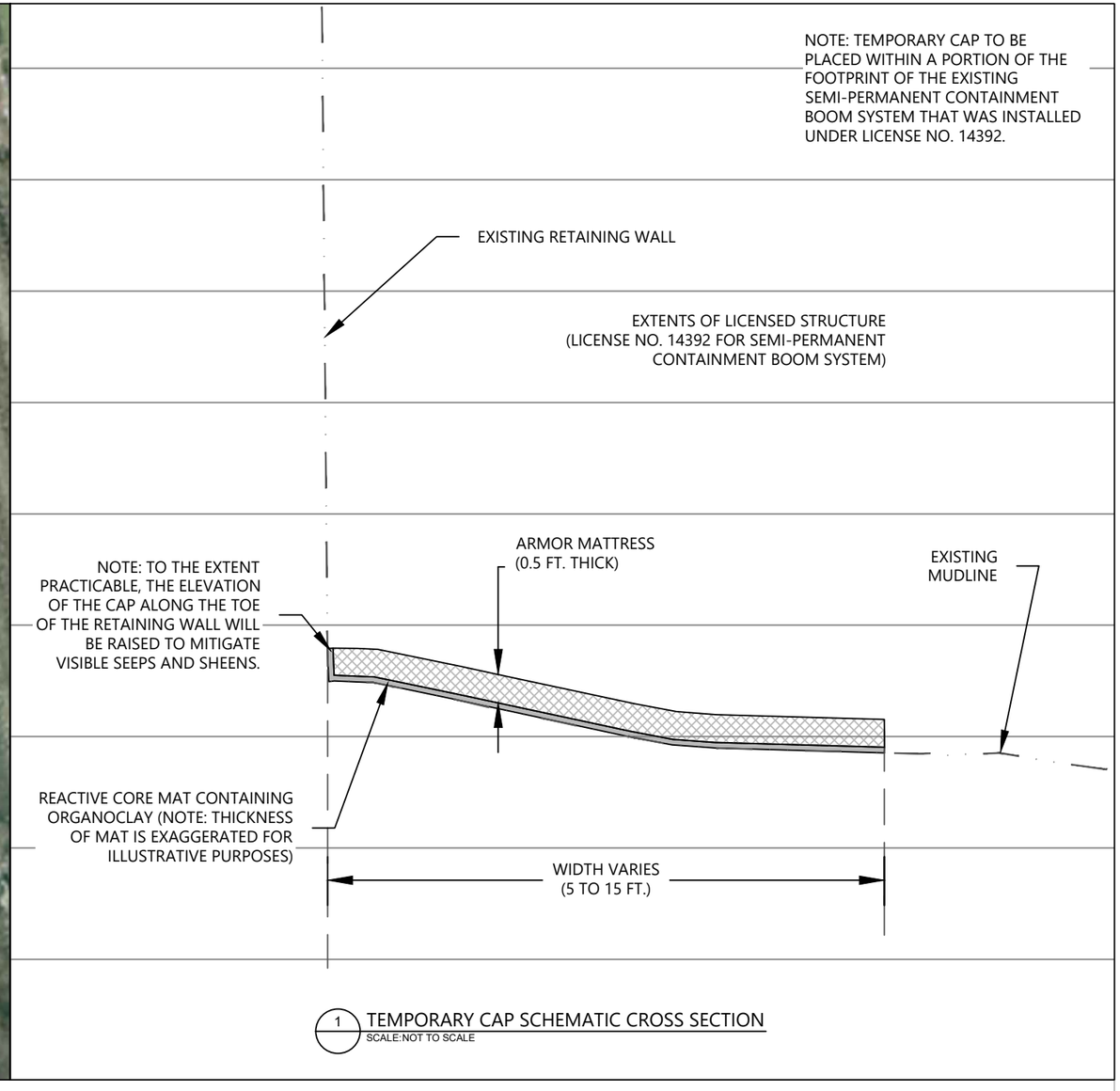
Filepath: G:\Projects\0327-National Grid\Haverhill__Notice of Intent Permit\0327-PL-004-Prop Remediation Sys Features_NOI.dwg FIGURE 4

ANCHOR QEA

FIGURE 3
PROPOSED UPLAND REMEDIATION PLAN

NOTICE OF INTENT
FORMER HAVERHILL MGP SITE
284 WINTER STREET
HAVERHILL, MA





SOURCE: AERIAL IMAGE FROM GOOGLE EARTH PRO, 2024.
HORIZONTAL DATUM: MASSACHUSETTS STATE PLANE MAINLAND ZONE, NAD83, U.S. SURVEY FEET
VERTICAL DATUM: NORTH AMERICAN VERTICAL DATUM OF 1988, FEET.

NOTES:
1. THE PRESENTED TEMPORARY CAP IS CONCEPTUAL AND SUBJECT TO CHANGE PRIOR TO INSTALLATION.

PLAN VIEW LEGEND:

- ALIGNMENT OF EXISTING RETAINING WALL
- PROPOSED APPROXIMATE TEMPORARY CAP FOOTPRINT
- EXTENTS OF LICENSED STRUCTURE (LICENSE NO. 14392)
- PROPOSED EROSION / SEDIMENTATION CONTROLS (SORBENT BOOM)

CROSS SECTION LEGEND:

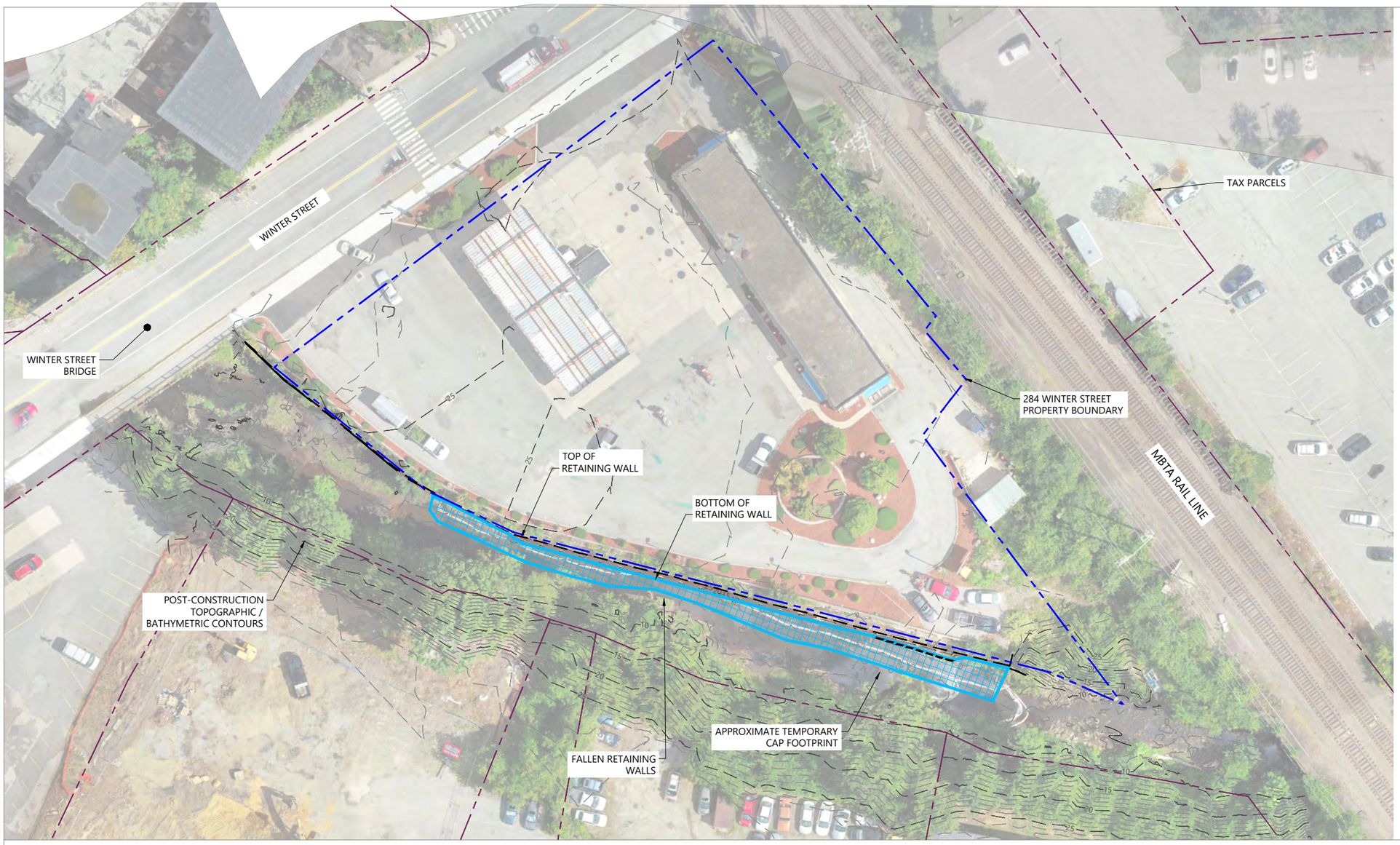
- EXISTING MUDLINE / RETAINING WALL
- PROPOSED REACTIVE CORE MAT
- PROPOSED ARMOR MATTRESS

Publish Date: 2024/09/16 12:54 PM | User: dbinkney
Filepath: G:\Projects\0327-National Grid\Haverhill_Notice of Intent Permit\0327-RP-003_Temporary Cap_Rev3_NOI.dwg Figure 4

ANCHOR QEA

FIGURE 4
PROPOSED SEDIMENT REMEDIATION PLAN

NOTICE OF INTENT
FORMER HAVERHILL MGP SITE
284 WINTER STREET
HAVERHILL, MA



LEGEND:

- POST-CONSTRUCTION TOPOGRAPHIC/ BATHYMETRIC CONTOURS (1-FOOT INTERVAL)
- 284 WINTER STREET (HAFFNER'S) PROPERTY BOUNDARY
- TAX PARCELS (MASS GIS)
- TOP OF RETAINING WALL
- BOTTOM OF RETAINING WALL
- FOOTPRINT OF TEMPORARY CAP

TOPOGRAPHIC/BATHYMETRIC SURVEY & AERIAL SOURCE: HYDRO DATA, Inc. (September 2022)
HORIZONTAL DATUM: NAD83 Massachusetts State Planes, Mainland Zone (NAD83), U.S. Survey Feet

VERTICAL DATUM: North American Vertical Datum of 1988 (NAVD88)
284 WINTER STREET BOUNDARY: ALTA Survey by MHF Design Consultants (2015).
TAX PARCEL BOUNDARIES: Massachusetts GIS (2023)

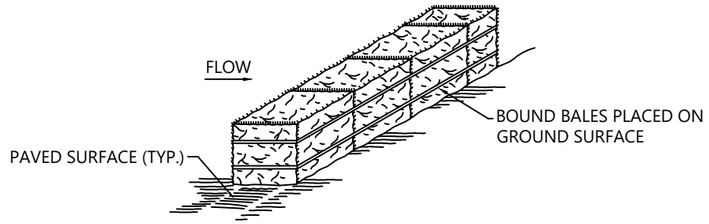
0 50
Feet

Publish Date: 2024/09/16 12:25 PM | User: dbinkney
Filepath: G:\Projects\0327-National Grid\Haverhill__Notice of Intent Permit\0327-PL-005-Post Construction Plan-River Area_NOI.dwg FIGURE 5

ANCHOR QEA

FIGURE 5
POST CONSTRUCTION CONDITIONS

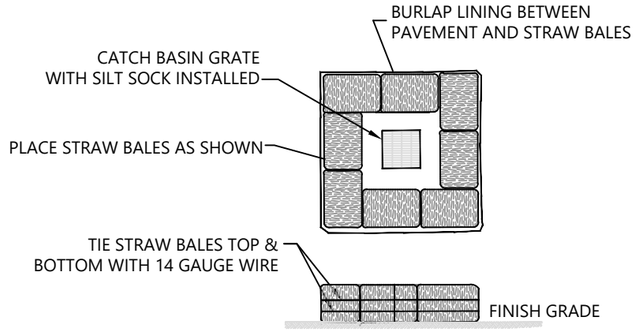
NOTICE OF INTENT
FORMER HAVERHILL MGP SITE
284 WINTER STREET
HAVERHILL, MA



NOTES:

1. STRAW BALES SHALL BE PLACED AS SHOWN IN A ROW WITH ENDS TIGHTLY ABUTTING THE ADJACENT STRAW BALES.
2. STRAW BALES SHALL BE USED ON PAVED SURFACES AND SHALL BE PLACED DIRECTLY ON BURLAP.
3. INSPECTION SHALL BE DAILY AND REPAIR/REPLACEMENT SHALL BE MADE PROMPTLY AS NEEDED.
4. STRAW BALES SHALL BE REMOVED ONLY AS DIRECTED BY ENGINEER.

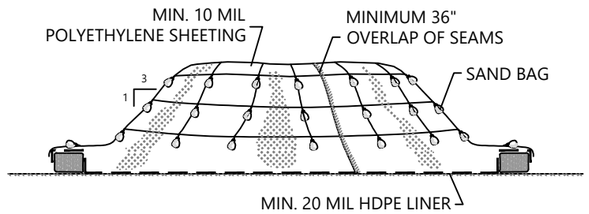
1 - SEDIMENT AND EROSION CONTROL BARRIER FOR PAVED AREAS (STRAW BALES)
SCALE: NOT TO SCALE



NOTES

1. INSERT SILT SOCK AND SURROUND DRAINAGE STRUCTURE INLET WITH STRAW BALES PRIOR TO CONSTRUCTION AND MAINTAIN UNTIL CONSTRUCTION IS COMPLETED. ACCUMULATED SEDIMENTS SHALL BE REMOVED.
2. STRAW BALES SHALL BE USED ON PAVED SURFACES AND SHALL BE PLACED DIRECTLY ON BURLAP.
3. INSPECTION SHALL BE DAILY AND REPAIR/REPLACEMENT SHALL BE MADE PROMPTLY AS NEEDED.
4. STRAW BALES SHALL BE REMOVED ONLY AS DIRECTED BY ENGINEER.

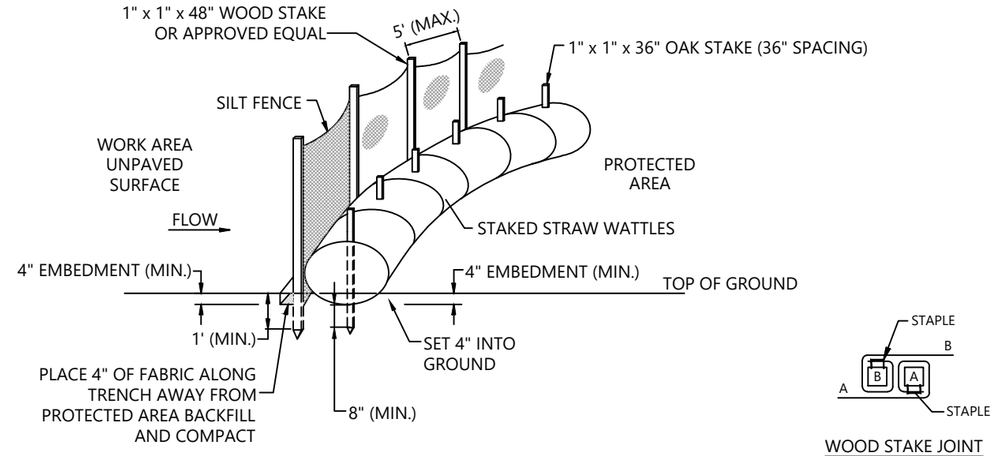
2 - CATCH BASIN INLET PROTECTION WITH STRAW BALES
SCALE: NOT TO SCALE



NOTES:

1. STOCKPILES SHALL BE PLACED ON MINIMUM 20 MIL HDPE LINER.
2. STOCKPILES SHALL BE COVERED WITH MINIMUM 10 MIL POLYETHYLENE SHEETING WHENEVER LOADING, STABILIZATION, OR PLACEMENT IS NOT OCCURRING.
3. STOCKPILE AREAS SHALL BE SUBJECT TO DUST / ODOR CONTROLS WHENEVER LOADING, STABILIZATION, OR PLACEMENT IS OCCURRING AND AS DIRECTED BY ENGINEER. STOCKPILES SHALL BE COVERED WITH POLYETHYLENE WHEN THESE ACTIVITIES ARE NOT BEING PERFORMED.
4. SHEETING COVERING STOCKPILE SHALL BE MAINTAINED TIGHTLY IN PLACE BY USING SAND BAGS ON ROPES WITH A MAXIMUM 10'-0" GRID SPACING IN ALL DIMENSIONS.
5. MINIMUM 36" OVERLAP OF ALL SEAMS REQUIRED.
6. STOCKPILE SIDE SLOPES SHALL BE NO STEEPER THAN 3 (HORIZONTAL) TO 1 (VERTICAL).

3 - TYPICAL STOCKPILE DETAIL
SCALE: NOT TO SCALE



NOTES

1. WHERE SILT FENCES OVERLAP, OVERLAP DISTANCE SHALL BE 36-INCHES.
2. INSPECTION SHALL BE DAILY AND REPAIR/REPLACEMENT SHALL BE MADE PROMPTLY AS NEEDED.
3. STRAW WATTLES SHALL BE REMOVED ONLY AS DIRECTED BY ENGINEER.

4 - SEDIMENTATION AND EROSION CONTROL BARRIER FOR UNPAVED AREAS (STRAW WATTLES)
SCALE: NOT TO SCALE

Publish Date: 2024/09/16 1:02 PM | User: dbinkney
Filepath: G:\Projects\0327-National Grid\Haverhill__Notice of Intent Permit\0327-PL-006-ESC Details_NOI.dwg Figure 6

ANCHOR QEA

FIGURE 6
EROSION AND SEDIMENTATION CONTROLS DETAILS

NOTICE OF INTENT
FORMER HAVERHILL MGP SITE
284 WINTER STREET
HAVERHILL, MA

Site Photograph Log

Photograph 1
Temporary Cap Footprint – Upstream, Looking South During Low-Flow Conditions (9/1/2022)

Photograph 2
Temporary Cap Footprint – Downstream, Looking North During Low-Flow Conditions (9/1/2022)

Photograph 3
Temporary Cap Footprint During Low-Flow Conditions (9/1/2022)

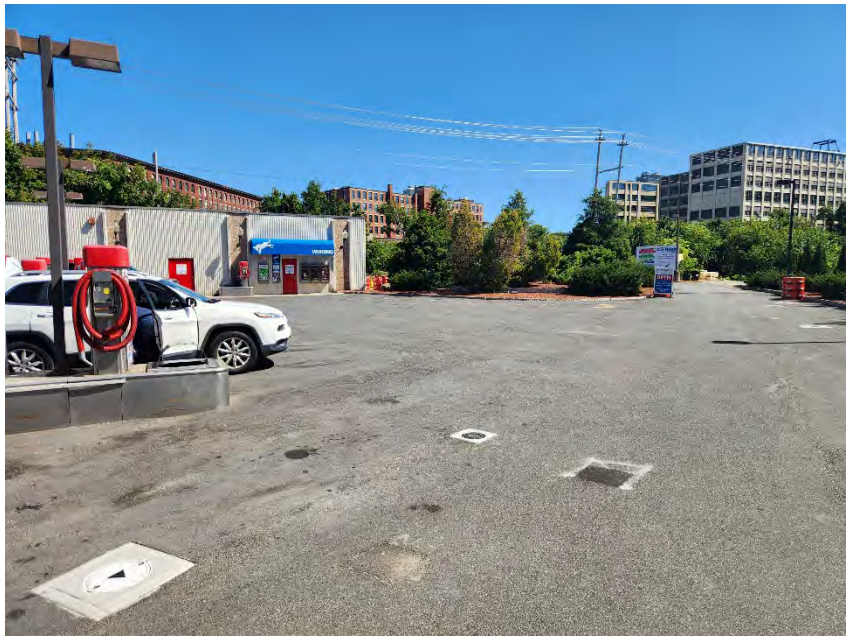
Photograph 4
Temporary Cap Footprint During Low-Flow Conditions (9/1/2022)

Photograph 5
Upland Project Area, Crane in Use (May 2024)

Photograph 6
Upland Project Area (September 2024)

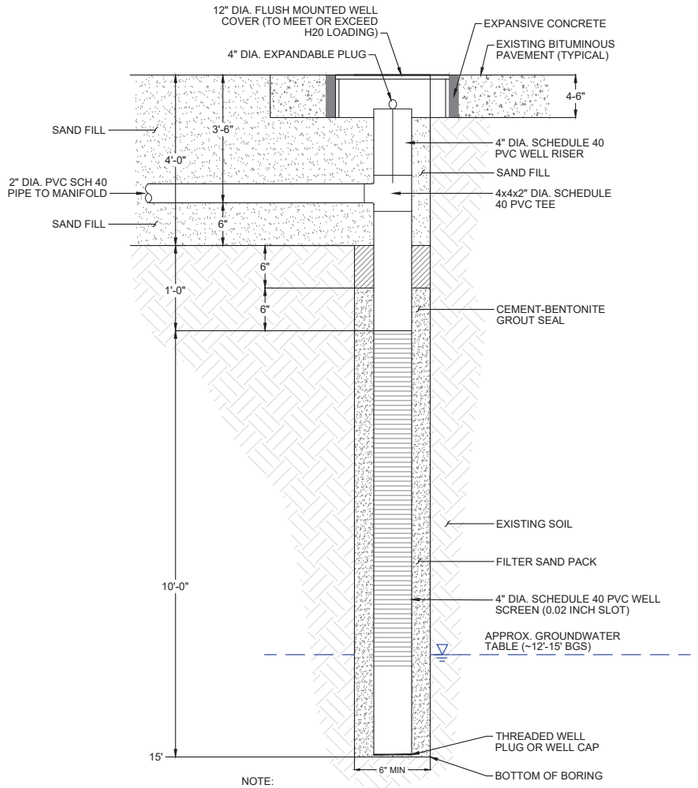
Photograph 7
Upland Project Area (September 2024)

Photograph 8
Upland Project Area (September 2024)



Photograph 9
Upland Project Area (September 2024)

Photograph 10
Upland Project Area (September 2024)

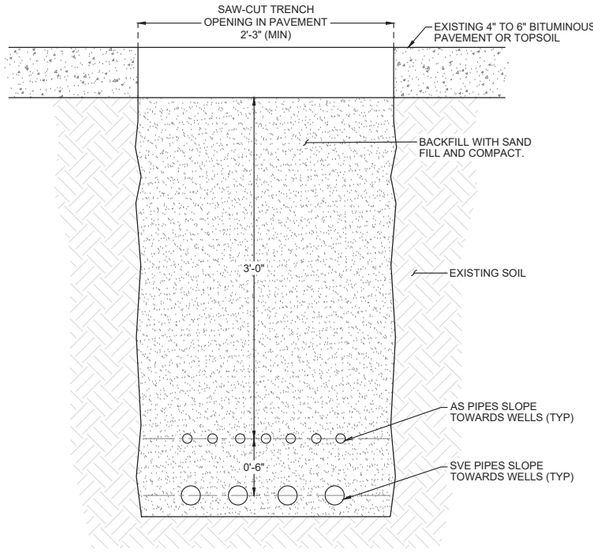


NOTE:

DEPTH OF BORING AND SCREEN INTERVAL MAY BE ADJUSTED DUE TO SOIL AND GROUNDWATER CONDITIONS ENCOUNTERED DURING INSTALLATION.

TYPICAL SVE WELL DETAIL WITH TRENCH

NOT TO SCALE

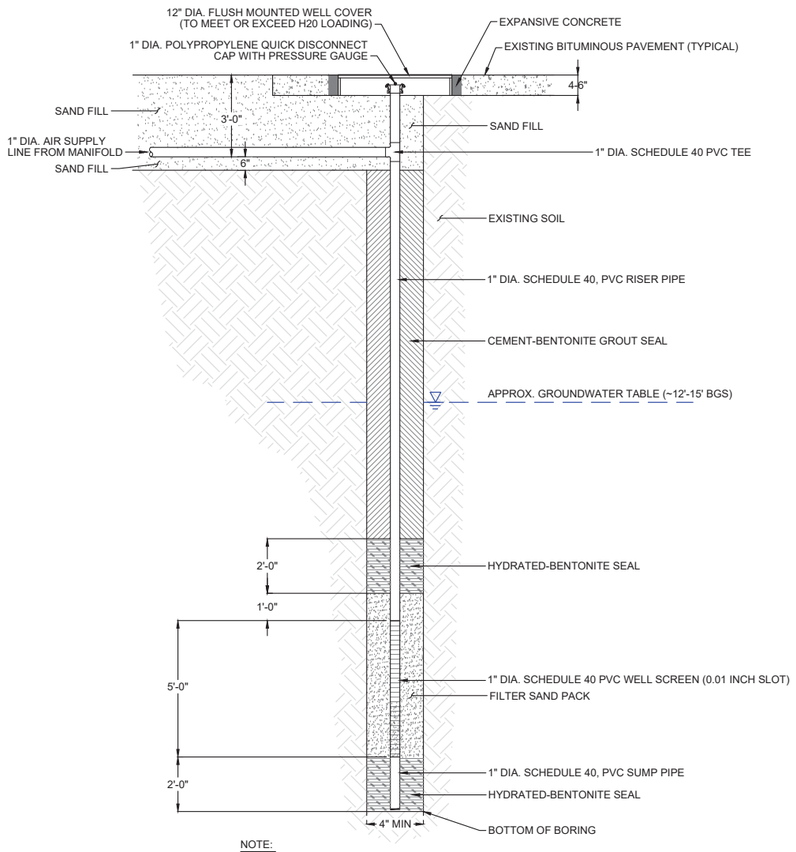


NOTES:

1. CONTRACTOR TO PROVIDE DUST AND WATER CONTROL FOR ALL SAW-CUTTING OPERATIONS.

TYPICAL TRENCH DETAIL

NOT TO SCALE

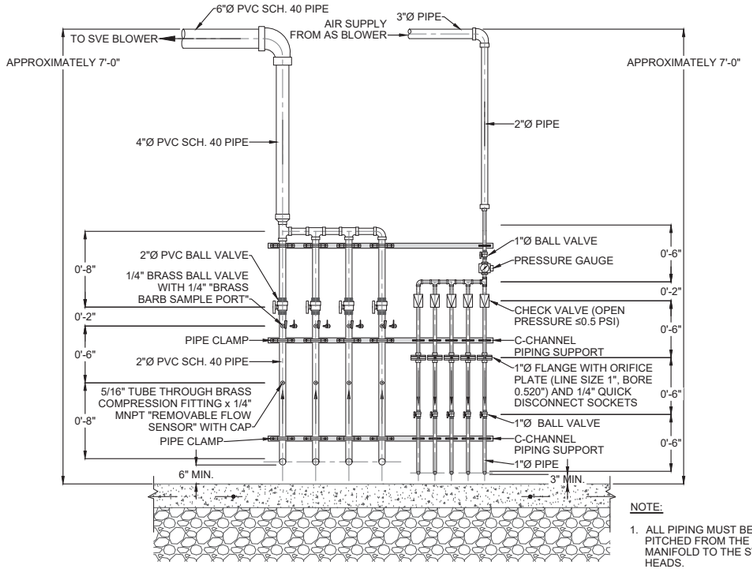


NOTE:

DEPTH OF BORING AND SCREEN INTERVAL MAY BE ADJUSTED DUE TO SOIL AND GROUNDWATER CONDITIONS ENCOUNTERED DURING INSTALLATION.

TYPICAL AS WELL DETAIL WITH TRENCH

NOT TO SCALE

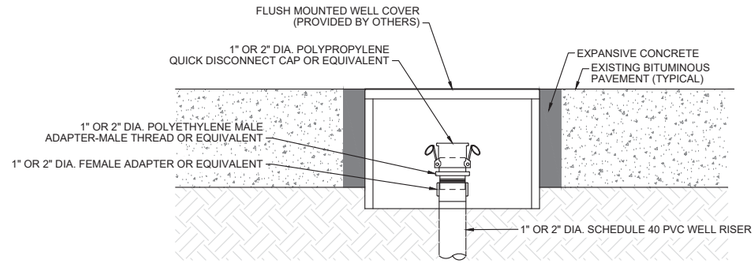


NOTE:

1. ALL PIPING MUST BE LEVEL OR PITCHED FROM THE PIPING MANIFOLD TO THE SVE/AS WELL HEADS.

TYPICAL AS/SVE PIPING MANIFOLD

NOT TO SCALE



MONITORING WELL RETROFIT DETAIL

NOT TO SCALE

0 4" 8" 16" 24"

HORIZONTAL SCALE

AIR SPARGE/SOIL VAPOR EXTRACTION SYSTEM
284 WINTER STREET
HAVERHILL, MASSACHUSETTS

SVE/AS SYSTEM DETAILS

PREPARED BY:		PREPARED FOR:	
GZA GeoEnvironmental, Inc. www.gza.com		nationalgrid	
PROJ MGR: JAI	REVIEWED BY: JAC	CHECKED BY: CAL	FIGURE 2
DESIGNED BY: AIF	DRAWN BY: GWB	SCALE: AS SHOWN	
DATE: 06/13/2024	PROJECT NO. 01.0172397.10	REVISION NO.	

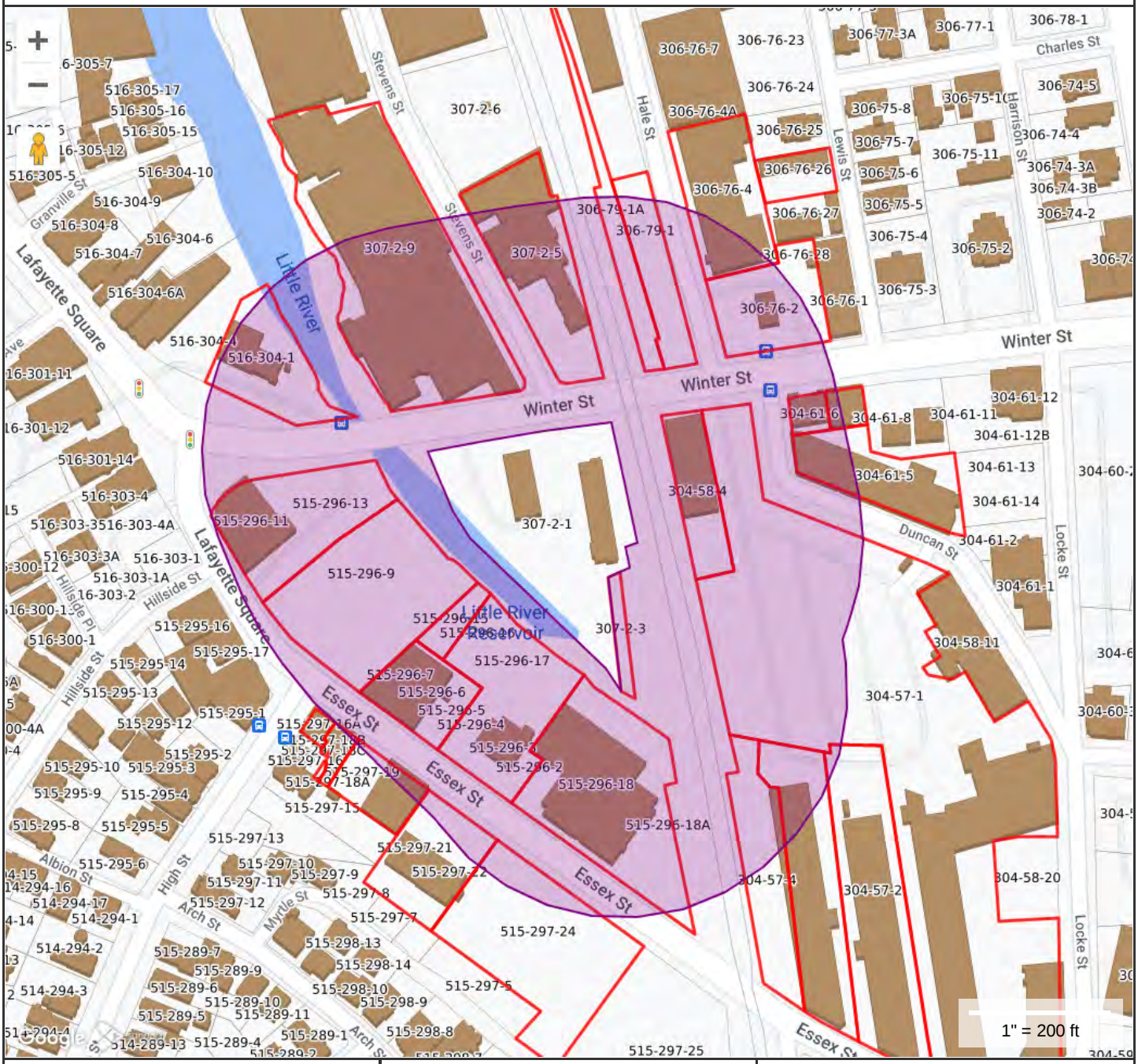
City of Haverhill Conservation Commission – HCC Local Application Form 3 Associated Figures

- MassGIS Orthophoto
- Abutters Within 300 Ft of 284 Winter Street
- NRCS Soils Map and Resource Report

ANCHOR QEA

MassGIS Orthophoto
Notice of Intent Application
284 Winter Street, Haverhill, MA

Abutters Within 300 Feet of 284 Winter Street

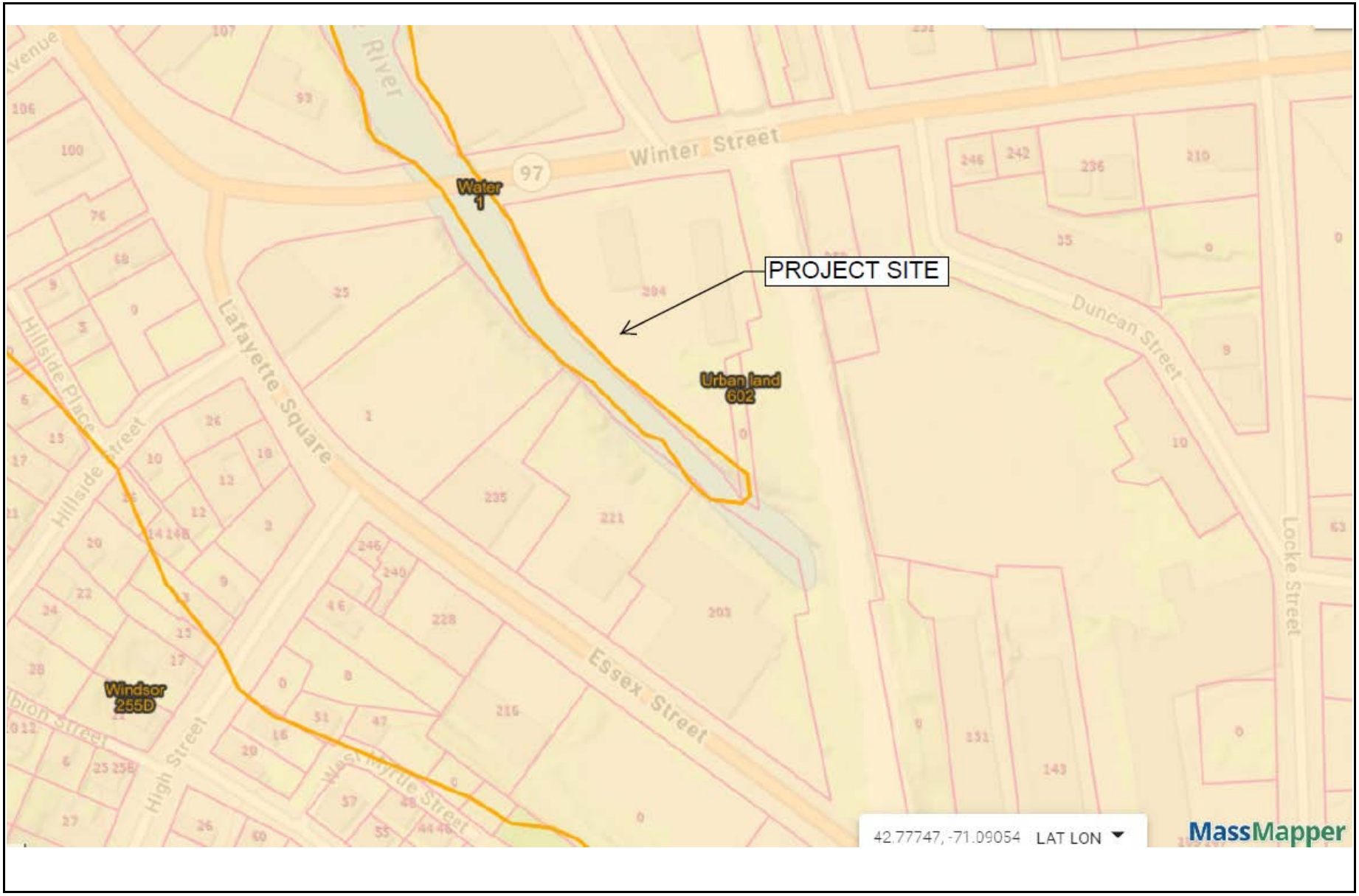


MAP FOR REFERENCE ONLY
NOT A LEGAL DOCUMENT

City of Haverhill, MA makes no claims and no warranties, expressed or implied, concerning the validity or accuracy of the GIS data presented on this map.

Geometry updated February 5, 2019
Data updated February 4, 2019

Print map scale is approximate. Critical layout or measurement activities should not be done using this resource.


PROJECT SITE
Winter Street
97
Water
1
Urban land
602
Windsor
255D
Lafayette Square
Essex Street
Duncan Street
Locke Street
High Street
Hillside Place
42.77747, -71.09054 LAT LON
MassMapper

Stormwater Report

- Stormwater Report
- Checklist for Stormwater Report

1.0 INTRODUCTION

This Stormwater Management Report has been prepared on behalf of the Boston Gas Company (BGC) for the remediation of Disposal Site and former Manufactured Gas Plant (MGP) located at 284 Winter Street in Haverhill, Massachusetts (the "Site"). A portion of the work associated with the remediation project is located within Wetlands Protection Act resource areas associated with the Little River, a perennial stream. The project involves installation of an air sparge/soil vapor extraction (AS/SVE) system and a temporary sediment cap to address contaminated groundwater.

The purpose of the report is to demonstrate compliance with the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Management Standards in accordance with the Massachusetts Wetlands Protection Act Regulations (310 CMR 10.00) and Water Quality Certification Regulations (314 CMR 9.00).

Portions of the project are located within Land Under Water and Waterbodies (LUWW) of a perennial stream, and within upland portions of Riverfront Area and 100-foot buffer zone to the Bank of the perennial stream. The remediation project will be designed to meet the appropriate Stormwater Standards to the extent practicable.

Details of the proposed work are presented in the Notice of Intent narrative that accompanies this report and on the project permit plans included therein.

The Stormwater Report, Erosion Control, and Operation & Maintenance Plans were developed in accordance with the following:

1. Massachusetts Erosion and Sediment Control Guidelines for Urban and Suburban Areas (March 1997).
2. The Massachusetts Department of Environmental Protection's Storm Water Handbook (January 2008).
3. The United States Environmental Protection Agency's (EPA) Storm Water Management for Construction Activities, Developing Pollution Prevention Plans and Best Management Practices (October 1992).

2.0 PROJECT INFORMATION

Project Name:

Winter Street Remediation Project

Project Location:
284 Winter Street
Haverhill, MA 01832

Project Proponent's Name(s) and Address:
Boston Gas Company
170 Data Drive
Waltham, Massachusetts 02451

Owner's Name(s) and Address:
HEG 284 Winter Street LLC
2 International Way
Lawrence, Massachusetts 01843

Report Preparer:
Anthony Damiano, WPIT
GZA GeoEnvironmental, Inc.
249 Vanderbilt Avenue
Norwood, MA 02062

3.0 SEQUENCE OF CONSTRUCTION ACTIVITIES

The general construction process for the upland area activities consists of the following:

- site mobilization and preparation;
- establishment of site survey controls;
- installation of erosion and sediment control measures;
- installation of air sparge/soil vapor extraction (AS/SVE) wells;
- removal of asphalt within excavation areas and excavation of soils and coal tar residuals;
- installation of piping and electrical conduits and backfill of trenches/excavations
- site restoration activities to restore the area to existing grades and surface conditions including recycled, onsite asphalt; and
- removal of erosion and sediment controls and demobilization.

The construction activities associated with the temporary remedial cap will include:

- site mobilization and preparation;
- installation of erosion and sediment control measures;
- construction of Temporary Controls elements including sorbent booms;
- installation of temporary cap
- removal of erosion and sediment controls, and demobilization.

4.0 LONG-TERM STORMWATER POLLUTION PREVENTION PLAN

A long-term Stormwater Pollution Prevention Plan is not required for this temporary project since all surfaces and grades will be restored to existing conditions.

5.0 CONSTRUCTION PERIOD POLLUTION PREVENTION PLAN AND EROSION & SEDIMENT CONTROL PLAN

The project's construction specifications and plans will require the contractor to install erosion and sediment control measures to prevent and limit potential impacts to adjacent inland resource areas. These measures will include, at a minimum, the items listed below. Additional measures will be implemented should unusual site or weather conditions require them. Erosion and sediment control measures are shown on the project permit plans in this Notice of Intent narrative.

- Excess materials generated during construction (debris, MGP-impacted materials, other excess materials) shall be removed and properly disposed of by the contractor. Upon finishing work, the contractor shall restore the areas to pre-construction conditions.

- Erosion control measures will be implemented around stockpiles of loose erodible material and storage and staging areas.

5.1 CONSTRUCTION SEQUENCE

The construction phase of the proposed project requires the installation of erosion and sediment controls and their maintenance. During the construction phase, major activities and their sequence in the construction phase will be as follows:

1. Mobilization.

2. Installation of temporary erosion control measures including staked weed-free straw wattles or bales and silt fencing in landscaped areas and haybales in paved areas. A silt sock and hay bales will be used to protect catch basins within the work area and additional measures to cut off flow to the catch basin will be implemented, as necessary.

3. Installation of AS/SVE wells and the temporary sediment cap.

4. Excavation of overburden soils and asphalt above the coal tar-impacted soil and then excavation of the coal tar residuals for off-site disposal.

5. Excavation of piping and electrical trenches with segregation of impacted materials for off-site disposal.

6. Installation of piping and electrical conduits and backfill of trenches.

7. Installation of the AS/SVE treatment system (cargo box) and completion of piping and electrical connections.

8. Restoration of areas of temporary disturbance.

9. Removal of temporary erosion controls upon final stabilization of disturbed areas.

5.2 DUST CONTROL

Fugitive dust emission controls including real-time air monitoring for particulates and water application as necessary will be implemented throughout the work.

5.3 NON-STORMWATER DISCHARGES

No non-stormwater discharges are anticipated. If dewatering is required, water will be containerized in one or more frac tanks, treated (if necessary), and disposed off-site.

5.4 EQUIPMENT STORAGE

Machinery, tools, and materials will be stored in a designated upland area.

5.5 SOLID WASTE DISPOSAL

The disposal of construction site wastes will be managed carefully. Waste materials will be collected and stored in securely covered receptacles. Waste materials that may be generated or encountered on site include the following:

- Packaging materials (including wood, paper, plastic, etc.).
- Debris including non-native material (brick, asphalt, concrete, metal, wood, etc.) that may be encountered within the area of excavation.
- Sampling and other testing materials.

5.6 TEMPORARY SANITARY WASTE DISPOSAL

If necessary, there will be temporary facilities for onsite use during construction. Domestic waste haulers licensed by the State of Massachusetts will be contracted to regularly remove the sanitary waste and to maintain the facilities in good working order.

5.7 MAINTENANCE AND INSPECTION PROCEDURES

The following inspection and maintenance practices will be used to maintain the erosion/sediment and pollution controls measures:

- Control measures will be inspected at the beginning and end of each workday and immediately after a rainfall of 0.25 inches or more.
- Control measures will be maintained in good working order. If an inspection indicates that repair or maintenance work is required, then said repair work must be performed that day.

5.8 SPILL PREVENTION

The typical construction materials expected to be present onsite during excavation activities will include the following:

- Petroleum products for equipment operation.
- Lubricating and other oils for equipment maintenance.

The contractor is responsible for preparing plans outlining environmental procedures for emergency/spill response, spill prevention, control, and countermeasures for activities involving the transportation, storage, usage, and cleanup (as necessary) of oil and/or hazardous materials used and stored in connection with the Project.

5.9 MATERIALS MANAGEMENT PRACTICES

The following are the material management practices that will be used to reduce the risk of spills or other accidental exposure of materials and substances to stormwater runoff.

1. The following good housekeeping practices will be followed onsite during the construction project:

- An effort will be made to store only sufficient amounts of products necessary to complete the work.
- Materials will be stored onsite in a neat, orderly manner in their original containers and, if possible, under a roof or other enclosure, as necessary.
- Manufacturers' recommendations for proper use and disposal will be followed.
- The site superintendent will inspect daily to ensure proper use and disposal of materials.
- Substances will not be mixed with one another, unless recommended by the manufacturer.
- Whenever possible, all of a product will be used up before disposing of the container.

2. Hazardous Products: While the use of hazardous products is not anticipated, the following practices will be used to reduce the risks associated with hazardous materials:

- Products will be kept in their original containers unless they are not re-sealable.
- Original labels and material safety data will be retained for important product information.
- Surplus products that must be disposed will be discarded according to the manufacturers or agency's recommended methods of disposal.

3. Product Specific Practices: The following product specific practices will be followed onsite:

- Petroleum Products: Onsite vehicles will be monitored for leaks and receive regular preventive maintenance to reduce leakage. Petroleum products will be stored in tightly sealed containers, with secondary containment, and will be clearly labeled.

5.10 SPILL CONTROL PRACTICES

In addition to good housekeeping and material management practices discussed in the previous section, the following practices will be followed for spill prevention and cleanup:

- Site personnel will be made aware of Manufacturers' recommended methods for spill cleanup procedures and the location of cleanup supplies.
- Materials and equipment necessary for spill cleanup will be kept in the material storage area onsite. Equipment and materials will include, but not be limited to, brooms, dustpans, mops, rags, gloves, goggles, granular absorbent, sand, sawdust, and plastic or metal trash containers specifically for this purpose.
- Minor spills will be cleaned up immediately after discovery.

- The spill area will be kept well ventilated, and personnel will wear appropriate protective clothing to prevent injury from contact with a hazardous substance.
- Spills of toxic or hazardous material will be reported to the Owner and Engineer and appropriate state or local government agencies will be notified as required by governing regulations.
- The site superintendent responsible for day-to-day site operations will be the spill prevention and cleanup coordinator.

6.0 LONG-TERM OPERATION AND MAINTENANCE PLAN

The work areas will be restored to existing conditions upon project completion; therefore, a long-term Operations and Maintenance Plan will not be required for the Project.

6.1 ROUTINE & NON-ROUTINE MAINTENANCE TASKS

The Project does not have or require maintenance tasks related to storm water management.

6.2 BMPS TREATMENT TRAIN PLAN

The Project does not include the construction of new stormwater BMPs.

6.3 PUBLIC SAFETY FEATURES

The Project does not have or require public safety procedures related to stormwater management.

6.4 ESTIMATED OPERATIONS AND MAINTENANCE BUDGET

The Project does not have or require maintenance tasks and no additional budget costs are anticipated.

7.0 PROJECT COMPLIANCE TO STORMWATER MANAGEMENT STANDARDS

As demonstrated below, the project is considered a Redevelopment Project and includes installation of an AS/SVE treatment system and temporary sediment cap to address benzene in groundwater. For these reasons, the project has been categorized as a Redevelopment Project under Volume 2, Chapter 3 of the Massachusetts Stormwater Handbook.

7.1 STANDARD 1 – UNTREATED STORMWATER DISCHARGES

The standard is *"No new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth."*

The Project will not result in the installation of new stormwater conveyances (e.g., outfalls).

7.2 STANDARD 2 – PEAK RATE CONTROL AND FLOOD PREVENTION

The standard is *"Stormwater management systems shall be designed so that the post-development peak discharge rates do not exceed pre-development discharge rates."*

As a Redevelopment Project, the project is required to meet Standard 2 only to the maximum extent practicable. The drainage conditions at the completion of the project have been designed to maintain existing local watershed patterns. Stormwater in the project area sheet flows off of the adjacent upland areas. There are no new drainage swales located within the project limits. The project will not result in an increase in impervious area or change in the runoff curve number for the Site. Also, the project will not alter drainage areas nor times of concentration; thus, the post-development peak discharge rates will not exceed pre-development peak discharge rates.

7.3 STANDARD 3 – RECHARGE TO GROUNDWATER

The standard is *"Loss of annual recharge to groundwater shall be eliminated or minimized through the use of environmentally sensitive site designs, low impact development techniques, stormwater best management practices and good operations and maintenance."*

As a Redevelopment Project, the project is required to meet Standard 3 only to the maximum extent practicable. The proposed project will not include the creation of new impervious areas, and disturbed areas will be returned to their preconstruction condition. The Project is not proposing to modify inland bank or buffer zone areas as part of construction activities. Therefore, it is not practicable to increase recharge at the Site.

7.4 STANDARD 4 – 80% TSS REMOVAL

The standard is *"Stormwater management systems shall be designed to remove 80% of the average annual post construction load of Total Suspended Solids (TSS)."*

As a Redevelopment Project, the project is required to meet the pretreatment and structural stormwater best management practice requirements of Standard 4 to the maximum extent practicable. The proposed project will not include the creation of new impervious areas, and disturbed areas will be returned to their pre-construction condition. The project will not increase the TSS in stormwater. For the reasons described in Section 7.3, modifications to the existing stormwater system to provide additional water quality treatment are not practicable.

7.5 STANDARD 5 – HIGHER POTENTIAL POLLUTANT LOADS

The standard is *"For land uses with higher potential pollutant loads, source control and pollution prevention shall be implemented…to eliminate or reduce the discharge of stormwater runoff from such land uses to the maximum extent practicable."*

As a Redevelopment Project, the project is required to meet the pretreatment and structural stormwater best management practice requirements of Standard 5 to the maximum extent practicable. The project is not classified as a use with a higher potential pollutant load; thus, Standard 5 is not applicable.

7.6 STANDARD 6 – CRITICAL AREA

The standard is *"Stormwater discharges within the Zone II or Interim Wellhead Protection Area of a public water supply and stormwater discharges near or to any other critical area require the use of specific source control and pollution prevention measures…"*

As a Redevelopment Project, the project is required to meet the pretreatment and structural stormwater best management practice requirements of Standard 6 to the maximum extent practicable. The project does not include proposed discharges to a Zone II, Interim Wellhead Protection Area, or other critical area. The proposed construction will not adversely affect runoff or increase stormwater pollution.

7.7 STANDARD 7 – REDEVELOPMENT PROJECT REQUIREMENTS

The standard is that *"A redevelopment project is required to meet the following Stormwater Management Standards only to the maximum extent practicable: Standard 2 [Peak Rate Control and Flood Prevention], Standard 3 [Recharge to Groundwater], and the pretreatment and structural best management practices requirements of Standards 4 [80% TSS Removal], 5 [Higher Potential Pollutant Loads], and 6 [Critical Area]. Existing stormwater discharges shall comply with Standard 1 [Untreated Stormwater Discharges] only to the maximum extent practicable. A redevelopment project shall also comply with all other requirements of the Stormwater Management Standards and improve existing conditions.* "

The Project has been classified as a redevelopment project because it results in no net increase in impervious area. The project maintains open or "country drainage." Temporarily disturbed areas will be stabilized during and upon completion of construction activities by repaving disturbed asphalt areas. Soil erosion and sediment controls will remain in place until the site is vegetatively stabilized. Combined with the reduction in exposed erosive soils, these measures will decrease the direct suspended solid deposition into the resource areas.

7.8 STANDARD 8 – EROSION AND SEDIMENT CONTROL

The standard is *"A plan to control construction-related impacts, including erosion, sedimentation, and other pollutant sources during construction and land disturbance activities (construction period erosion, sedimentation, and pollution prevention plan) shall be developed and implemented."*

The project will not result in discharge to adjacent waterbodies and therefor will not be required to obtain coverage under the EPA National Pollutant Discharge Elimination System (NPDES) Construction General Permit and/or a Dewatering Remediation General Permit.

7.9 STANDARD 9 – OPERATION AND MAINTENANCE

The standard is that *"A Long-Term Operation and Maintenance (O&M) Plan shall be developed and implemented to ensure that stormwater management systems function as designed."*

As previously stated, since the work areas will be restored to existing conditions upon project completion, a long-term Operations and Maintenance Plan will not be required for the Project.

7.10 STANDARD 10 – ILLICIT DISCHARGE

The standard is "*All illicit discharges to the stormwater management system are prohibited."*

There are no known or proposed illicit discharges into the stormwater management system at the Site. Appropriate BMPs will be utilized to protect stormwater catch basins on Site. The project will be developed in full compliance with current stormwater management standards.

8.0 PROHIBITION OF ILLICIT DISCHARGES

The MassDEP Stormwater Management Standards prohibit illicit discharges to the stormwater management system. Illicit discharges are discharges that do not entirely consist of stormwater, except for certain specified non-stormwater discharges.

Discharges from the following sources are not considered illicit discharges[1]:

- Firefighting activities
- Riparian habitats/wetlands
- Storm surge / tidal flooding
- Foundation drain lines
- Potable water sources
- Line flushing
- Dechlorinated swimming pool water
- Footing drains
- Street sweeping
- Irrigation systems
- Wash water from buildings (without detergents)
- Residential car washing
- Condensation from air conditioning units
- Uncontaminated groundwater
- Rising groundwater
- Run-on from private driveways caused by precipitation

[1] Water from firefighting activities is allowed under this permit and need only be addressed where they are identified as significant sources of pollutants to waters of the United States.

- Lawn watering

There are no known or proposed illicit connections associated with this project. If a potential illicit discharge from the activities or facilities covered by this plan is detected (e.g., dry weather flows at any pipe outlet, evidence of contamination of surface water discharge by non-stormwater sources), Boston Gas Company and the property owner shall be notified for assistance in determining the nature and source of the discharge, and for resolution of the discharge.

Attachments: Attachment I - Massachusetts Department of Environmental Protection Checklist for Stormwater Report

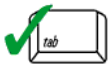
Attachment I - Massachusetts Department of Environmental Protection Checklist for Stormwater Report

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands Program

Checklist for Stormwater Report

A. Introduction

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



A Stormwater Report must be submitted with the Notice of Intent permit application to document compliance with the Stormwater Management Standards. The following checklist is NOT a substitute for the Stormwater Report (which should provide more substantive and detailed information) but is offered here as a tool to help the applicant organize their Stormwater Management documentation for their Report and for the reviewer to assess this information in a consistent format. As noted in the Checklist, the Stormwater Report must contain the engineering computations and supporting information set forth in Volume 3 of the Massachusetts Stormwater Handbook. The Stormwater Report must be prepared and certified by a Registered Professional Engineer (RPE) licensed in the Commonwealth.

The Stormwater Report must include:

- The Stormwater Checklist completed and stamped by a Registered Professional Engineer (see page 2) that certifies that the Stormwater Report contains all required submittals.[1] This Checklist is to be used as the cover for the completed Stormwater Report.
- Applicant/Project Name
- Project Address
- Name of Firm and Registered Professional Engineer that prepared the Report
- Long-Term Pollution Prevention Plan required by Standards 4-6
- Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan required by Standard 8[2]
- Operation and Maintenance Plan required by Standard 9

In addition to all plans and supporting information, the Stormwater Report must include a brief narrative describing stormwater management practices, including environmentally sensitive site design and LID techniques, along with a diagram depicting runoff through the proposed BMP treatment train. Plans are required to show existing and proposed conditions, identify all wetland resource areas, NRCS soil types, critical areas, Land Uses with Higher Potential Pollutant Loads (LUHPPL), and any areas on the site where infiltration rate is greater than 2.4 inches per hour. The Plans shall identify the drainage areas for both existing and proposed conditions at a scale that enables verification of supporting calculations.

As noted in the Checklist, the Stormwater Management Report shall document compliance with each of the Stormwater Management Standards as provided in the Massachusetts Stormwater Handbook. The soils evaluation and calculations shall be done using the methodologies set forth in Volume 3 of the Massachusetts Stormwater Handbook.

To ensure that the Stormwater Report is complete, applicants are required to fill in the Stormwater Report Checklist by checking the box to indicate that the specified information has been included in the Stormwater Report. If any of the information specified in the checklist has not been submitted, the applicant must provide an explanation. The completed Stormwater Report Checklist and Certification must be submitted with the Stormwater Report.

[1] The Stormwater Report may also include the Illicit Discharge Compliance Statement required by Standard 10. If not included in the Stormwater Report, the Illicit Discharge Compliance Statement must be submitted prior to the discharge of stormwater runoff to the post-construction best management practices.

[2] For some complex projects, it may not be possible to include the Construction Period Erosion and Sedimentation Control Plan in the Stormwater Report. In that event, the issuing authority has the discretion to issue an Order of Conditions that approves the project and includes a condition requiring the proponent to submit the Construction Period Erosion and Sedimentation Control Plan before commencing any land disturbance activity on the site.

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands Program

Checklist for Stormwater Report

B. Stormwater Checklist and Certification

The following checklist is intended to serve as a guide for applicants as to the elements that ordinarily need to be addressed in a complete Stormwater Report. The checklist is also intended to provide conservation commissions and other reviewing authorities with a summary of the components necessary for a comprehensive Stormwater Report that addresses the ten Stormwater Standards.

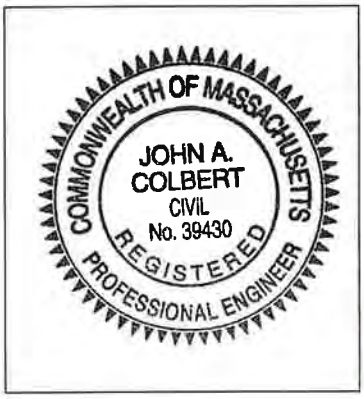
Note: Because stormwater requirements vary from project to project, it is possible that a complete Stormwater Report may not include information on some of the subjects specified in the Checklist. If it is determined that a specific item does not apply to the project under review, please note that the item is not applicable (N.A.) and provide the reasons for that determination.

A complete checklist must include the Certification set forth below signed by the Registered Professional Engineer who prepared the Stormwater Report.

Registered Professional Engineer's Certification

I have reviewed the Stormwater Report, including the soil evaluation, computations, Long-term Pollution Prevention Plan, the Construction Period Erosion and Sedimentation Control Plan (if included), the Long-term Post-Construction Operation and Maintenance Plan, the Illicit Discharge Compliance Statement (if included) and the plans showing the stormwater management system, and have determined that they have been prepared in accordance with the requirements of the Stormwater Management Standards as further elaborated by the Massachusetts Stormwater Handbook. I have also determined that the information presented in the Stormwater Checklist is accurate and that the information presented in the Stormwater Report accurately reflects conditions at the site as of the date of this permit application.

Registered Professional Engineer Block and Signature



9/18/2024

Signature and Date

Checklist

Project Type: Is the application for new development, redevelopment, or a mix of new and redevelopment?

☐ New development

☒ Redevelopment

☐ Mix of New Development and Redevelopment

Checklist for Stormwater Report

Checklist (continued)

LID Measures: Stormwater Standards require LID measures to be considered. Document what environmentally sensitive design and LID Techniques were considered during the planning and design of the project:

☒ No disturbance to any Wetland Resource Areas

☐ Site Design Practices (e.g. clustered development, reduced frontage setbacks)

☐ Reduced Impervious Area (Redevelopment Only)

☒ Minimizing disturbance to existing trees and shrubs

☐ LID Site Design Credit Requested:

- ☐ Credit 1
- ☐ Credit 2
- ☐ Credit 3

☒ Use of "country drainage" versus curb and gutter conveyance and pipe

☐ Bioretention Cells (includes Rain Gardens)

☐ Constructed Stormwater Wetlands (includes Gravel Wetlands designs)

☐ Treebox Filter

☐ Water Quality Swale

☐ Grass Channel

☐ Green Roof

☐ Other (describe): _____

Standard 1: No New Untreated Discharges

☒ No new untreated discharges

☐ Outlets have been designed so there is no erosion or scour to wetlands and waters of the Commonwealth

☐ Supporting calculations specified in Volume 3 of the Massachusetts Stormwater Handbook included.

Checklist for Stormwater Report

Checklist (continued)

Standard 2: Peak Rate Attenuation

☐ Standard 2 waiver requested because the project is located in land subject to coastal storm flowage and stormwater discharge is to a wetland subject to coastal flooding.

☒ Evaluation provided to determine whether off-site flooding increases during the 100-year 24-hour storm.

☐ Calculations provided to show that post-development peak discharge rates do not exceed pre-development rates for the 2-year and 10-year 24-hour storms. If evaluation shows that off-site flooding increases during the 100-year 24-hour storm, calculations are also provided to show that post-development peak discharge rates do not exceed pre-development rates for the 100-year 24-hour storm.

Standard 3: Recharge

☐ Soil Analysis provided.

☐ Required Recharge Volume calculation provided.

☐ Required Recharge volume reduced through use of the LID site Design Credits.

☐ Sizing the infiltration, BMPs is based on the following method: Check the method used.

☐ Static ☐ Simple Dynamic ☐ Dynamic Field[1]

☐ Runoff from all impervious areas at the site discharging to the infiltration BMP.

☐ Runoff from all impervious areas at the site is *not* discharging to the infiltration BMP and calculations are provided showing that the drainage area contributing runoff to the infiltration BMPs is sufficient to generate the required recharge volume.

☐ Recharge BMPs have been sized to infiltrate the Required Recharge Volume.

☒ Recharge BMPs have been sized to infiltrate the Required Recharge Volume *only* to the maximum extent practicable for the following reason:

- ☐ Site is comprised solely of C and D soils and/or bedrock at the land surface
- ☒ M.G.L. c. 21E sites pursuant to 310 CMR 40.0000
- ☐ Solid Waste Landfill pursuant to 310 CMR 19.000
- ☒ Project is otherwise subject to Stormwater Management Standards only to the maximum extent practicable.

☐ Calculations showing that the infiltration BMPs will drain in 72 hours are provided.

☐ Property includes a M.G.L. c. 21E site or a solid waste landfill and a mounding analysis is included.

[1] 80% TSS removal is required prior to discharge to infiltration BMP if Dynamic Field method is used.

Checklist for Stormwater Report

Checklist (continued)

Standard 3: Recharge (continued)

☐ The infiltration BMP is used to attenuate peak flows during storms greater than or equal to the 10-year 24-hour storm and separation to seasonal high groundwater is less than 4 feet and a mounding analysis is provided.

☐ Documentation is provided showing that infiltration BMPs do not adversely impact nearby wetland resource areas.

Standard 4: Water Quality

The Long-Term Pollution Prevention Plan typically includes the following:

- Good housekeeping practices;
- Provisions for storing materials and waste products inside or under cover;
- Vehicle washing controls;
- Requirements for routine inspections and maintenance of stormwater BMPs;
- Spill prevention and response plans;
- Provisions for maintenance of lawns, gardens, and other landscaped areas;
- Requirements for storage and use of fertilizers, herbicides, and pesticides;
- Pet waste management provisions;
- Provisions for operation and management of septic systems;
- Provisions for solid waste management;
- Snow disposal and plowing plans relative to Wetland Resource Areas;
- Winter Road Salt and/or Sand Use and Storage restrictions;
- Street sweeping schedules;
- Provisions for prevention of illicit discharges to the stormwater management system;
- Documentation that Stormwater BMPs are designed to provide for shutdown and containment in the event of a spill or discharges to or near critical areas or from LUHPPL;
- Training for staff or personnel involved with implementing Long-Term Pollution Prevention Plan;
- List of Emergency contacts for implementing Long-Term Pollution Prevention Plan.

☐ A Long-Term Pollution Prevention Plan is attached to Stormwater Report and is included as an attachment to the Wetlands Notice of Intent.

☐ Treatment BMPs subject to the 44% TSS removal pretreatment requirement and the one inch rule for calculating the water quality volume are included, and discharge:

- ☐ is within the Zone II or Interim Wellhead Protection Area
- ☐ is near or to other critical areas
- ☐ is within soils with a rapid infiltration rate (greater than 2.4 inches per hour)
- ☐ involves runoff from land uses with higher potential pollutant loads.

☐ The Required Water Quality Volume is reduced through use of the LID site Design Credits.

☐ Calculations documenting that the treatment train meets the 80% TSS removal requirement and, if applicable, the 44% TSS removal pretreatment requirement, are provided.

Checklist for Stormwater Report

Checklist (continued)

Standard 4: Water Quality (continued)

☐ The BMP is sized (and calculations provided) based on:

- ☐ The ½" or 1" Water Quality Volume or
- ☐ The equivalent flow rate associated with the Water Quality Volume and documentation is provided showing that the BMP treats the required water quality volume.

☐ The applicant proposes to use proprietary BMPs, and documentation supporting use of proprietary BMP and proposed TSS removal rate is provided. This documentation may be in the form of the propriety BMP checklist found in Volume 2, Chapter 4 of the Massachusetts Stormwater Handbook and submitting copies of the TARP Report, STEP Report, and/or other third party studies verifying performance of the proprietary BMPs.

☐ A TMDL exists that indicates a need to reduce pollutants other than TSS and documentation showing that the BMPs selected are consistent with the TMDL is provided.

Standard 5: Land Uses With Higher Potential Pollutant Loads (LUHPPLs)

☐ The NPDES Multi-Sector General Permit covers the land use and the Stormwater Pollution Prevention Plan (SWPPP) has been included with the Stormwater Report.

☐ The NPDES Multi-Sector General Permit covers the land use and the SWPPP will be submitted ***prior to*** the discharge of stormwater to the post-construction stormwater BMPs.

☒ The NPDES Multi-Sector General Permit does ***not*** cover the land use.

☐ LUHPPLs are located at the site and industry specific source control and pollution prevention measures have been proposed to reduce or eliminate the exposure of LUHPPLs to rain, snow, snow melt and runoff, and been included in the long term Pollution Prevention Plan.

☐ All exposure has been eliminated.

☐ All exposure has ***not*** been eliminated and all BMPs selected are on MassDEP LUHPPL list.

☐ The LUHPPL has the potential to generate runoff with moderate to higher concentrations of oil and grease (e.g. all parking lots with >1000 vehicle trips per day) and the treatment train includes an oil grit separator, a filtering bioretention area, a sand filter or equivalent.

Standard 6: Critical Areas

☐ The discharge is near or to a critical area and the treatment train includes only BMPs that MassDEP has approved for stormwater discharges to or near that particular class of critical area.

☒ Critical areas and BMPs are identified in the Stormwater Report.

Checklist for Stormwater Report

Checklist (continued)

Standard 7: Redevelopments and Other Projects Subject to the Standards only to the maximum extent practicable

☒ The project is subject to the Stormwater Management Standards only to the maximum Extent Practicable as a:

- ☒ Limited Project
- ☐ Small Residential Projects: 5-9 single family houses or 5-9 units in a multi-family development provided there is no discharge that may potentially affect a critical area.
- ☐ Small Residential Projects: 2-4 single family houses or 2-4 units in a multi-family development with a discharge to a critical area
- ☐ Marina and/or boatyard provided the hull painting, service and maintenance areas are protected from exposure to rain, snow, snow melt and runoff
- ☐ Bike Path and/or Foot Path
- ☒ Redevelopment Project
- ☐ Redevelopment portion of mix of new and redevelopment.

☒ Certain standards are not fully met (Standard No. 1, 8, 9, and 10 must always be fully met) and an explanation of why these standards are not met is contained in the Stormwater Report.

☐ The project involves redevelopment and a description of all measures that have been taken to improve existing conditions is provided in the Stormwater Report. The redevelopment checklist found in Volume 2 Chapter 3 of the Massachusetts Stormwater Handbook may be used to document that the proposed stormwater management system (a) complies with Standards 2, 3 and the pretreatment and structural BMP requirements of Standards 4-6 to the maximum extent practicable and (b) improves existing conditions.

Standard 8: Construction Period Pollution Prevention and Erosion and Sedimentation Control

A Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan must include the following information:

- Narrative;
- Construction Period Operation and Maintenance Plan;
- Names of Persons or Entity Responsible for Plan Compliance;
- Construction Period Pollution Prevention Measures;
- Erosion and Sedimentation Control Plan Drawings;
- Detail drawings and specifications for erosion control BMPs, including sizing calculations;
- Vegetation Planning;
- Site Development Plan;
- Construction Sequencing Plan;
- Sequencing of Erosion and Sedimentation Controls;
- Operation and Maintenance of Erosion and Sedimentation Controls;
- Inspection Schedule;
- Maintenance Schedule;
- Inspection and Maintenance Log Form.

☒ A Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan containing the information set forth above has been included in the Stormwater Report.

Checklist for Stormwater Report

Checklist (continued)

Standard 8: Construction Period Pollution Prevention and Erosion and Sedimentation Control (continued)

☐ The project is highly complex and information is included in the Stormwater Report that explains why it is not possible to submit the Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan with the application. A Construction Period Pollution Prevention and Erosion and Sedimentation Control has ***not*** been included in the Stormwater Report but will be submitted ***before*** land disturbance begins.

☒ The project is ***not*** covered by a NPDES Construction General Permit.

☐ The project is covered by a NPDES Construction General Permit and a copy of the SWPPP is in the Stormwater Report.

☐ The project is covered by a NPDES Construction General Permit but no SWPPP been submitted. The SWPPP will be submitted BEFORE land disturbance begins.

Standard 9: Operation and Maintenance Plan

☐ The Post Construction Operation and Maintenance Plan is included in the Stormwater Report and includes the following information:

- ☐ Name of the stormwater management system owners;
- ☐ Party responsible for operation and maintenance;
- ☐ Schedule for implementation of routine and non-routine maintenance tasks;
- ☐ Plan showing the location of all stormwater BMPs maintenance access areas;
- ☐ Description and delineation of public safety features;
- ☐ Estimated operation and maintenance budget; and
- ☐ Operation and Maintenance Log Form.

☐ The responsible party is ***not*** the owner of the parcel where the BMP is located and the Stormwater Report includes the following submissions:

- ☐ A copy of the legal instrument (deed, homeowner's association, utility trust or other legal entity) that establishes the terms of and legal responsibility for the operation and maintenance of the project site stormwater BMPs;
- ☐ A plan and easement deed that allows site access for the legal entity to operate and maintain BMP functions.

Standard 10: Prohibition of Illicit Discharges

☐ The Long-Term Pollution Prevention Plan includes measures to prevent illicit discharges;

☒ An Illicit Discharge Compliance Statement is attached;

☐ NO Illicit Discharge Compliance Statement is attached but will be submitted ***prior to*** the discharge of any stormwater to post-construction BMPs.

Abutter Information

- List of Abutters
- Notice to Abutters Letter
- Abutters Map

Table 1 - Properties Within 300 Feet of 284 Winter Street, Haverhill, MA

Assessor's Parcel Property ID	Site Address	Owner	Owner 2	Owner Address	Owner City	Owner State	Owner Zip
304-57-1	40 LOCKE ST	LOCKE STREET OWNER LLC	C/O THE DFS GROUP	341 NEWBURY ST, SUITE 5	BOSTON	MA	02115
304-57-2	143 ESSEX ST	SOCIETY FOR THE PRESERVATION OF NEW ENGLAND	ANTIQUITIES, INC	151 ESSEX ST	HAVERHILL	MA	01832-5528
304-57-3	151 ESSEX ST	THE SOCIETY FOR PRESERVATION OF N.E. ANTIQUITIES	C/O HISTORIC NEW ENGLAND	151 ESSEX ST	HAVERHILL	MA	01832
304-57-4	ESSEX ST	M BAY TRANS AUTHORITY		45 HIGH ST	BOSTON	MA	02110
304-58-4	258 WINTER ST	LOCKE STREET OWNER LLC	C/O THE DFS GROUP	341 NEWBURY ST, SUITE 5	BOSTON	MA	02115
304-61-5	35 DUNCAN ST	BURGETT ENT., LLC		4111-A NORTH FREEWAY BLVD	SACRAMENTO	CA	95834-1209
304-61-6	246 WINTER ST	GACEMA, INC		246 WINTER ST, 1ST FLOOR	HAVERHILL	MA	01830
304-61-7	242 WINTER ST	242 1/2 WINTER STREET RLTY TR	LITTLEFIELD RUSSELL G TR	242 WINTER ST	HAVERHILL	MA	01830
306-76-2	251 WINTER ST	RICE PHIL		P O BOX 1626	HAVERHILL	MA	01831
306-76-4	9 HALE ST	CUBESMART, L.P.		5 OLD LANCASTER RD	MALVERN	PA	19355
306-79-1	6 HALE ST	CUBESMART, L.P.		5 OLD LANCASTER ROAD	MALVERN	PA	19355
306-79-1A	WINTER ST	MASSACHUSETTS ELECTRIC CO	PROPERTY TAX DEPT	40 SYLVAN RD	WALTHAM	MA	02451-2286
307-2-3	WINTER ST	M BAY TRANS AUTHORITY		45 HIGH ST	BOSTON	MA	02110
307-2-5	265 WINTER ST	KENNEBEC REALTY TRUST	LAMBERT RICHARD TRUSTEE	265 WINTER ST	HAVERHILL	MA	01830
307-2-9	14 STEVENS ST	SHAIN REALTY TRUST	SHAIN STEVEN + CAROL	2506 FAIRWAY DRIVE NORTH	JUPITER	FL	33477
515-296-11	25 LAFAYETTE SQ	VICTOR VON VASTA REVOCABLE TRUST	VASTA DAVID-TRUSTEE	5 HERON COVE RD	WINDHAM	NH	03087
515-296-18	203 ESSEX ST	ALOSKY REALTY CORP	JOSEPH ALOSKY TR	203 ESSEX ST	HAVERHILL	MA	01832
515-296-3	221 ESSEX ST	LEBLANC STEPHEN		221 ESSEX ST	HAVERHILL	MA	01830
515-296-5	235 ESSEX ST	PAS INVESTMENTS LLC		52 COLBY RD	DANVILLE	NH	03819
515-296-5-1	1 LAFAYETTE SQ	1117 MIDDLESEX, LLC		1107 BRIDGE ST., UNIT 4	LOWELL	MA	01850
515-297-16A	246 ESSEX ST	WILLIAM H RYAN TRUST	RYAN WILLIAM H-TRUSTEE	16 CONCORD ST	HAVERHILL	MA	01830
515-297-18	240 ESSEX ST	RUSTANI MASSACHUSETTS TRUST	RUSTANI JONUS-TRUSTEE	240 ESSEX STREET	HAVERHILL	MA	01832
515-297-20	228 ESSEX ST	230 ESSEX STREET TRUST	ANDREW R. DIPIETRO-TRUSTEE	230 ESSEX ST	HAVERHILL	MA	01832
515-297-22	216 ESSEX ST	216 ESSEX STREET REALTY TRUST	DIPIETRO ANDREW-TRUSTEE	230 ESSEX ST	HAVERHILL	MA	01832
515-297-24	ESSEX ST	SOCIETY FOR THE PRESERVATION OF NEW ENGLAND	ANTIQUITIES, INC	151 ESSEX ST	HAVERHILL	MA	01832-5528
516-304-1	93 LAFAYETTE SQ	NEW ALPHA BRO PROPERTY, LLC		93 LAFAYETTE SQ	HAVERHILL	MA	01832

Source: https://haverhillma.mapgeo.io; accessed on September 12, 2024

H. ABUTTER NOTIFICATION FORM

In accordance with the second paragraph of Massachusetts General Laws Chapter 131, Section 40 (the Wetlands Protection Act) and Haverhill Municipal Ordinance Chapter 253, Section 5, you are hereby notified of the following:

1. The name of the applicant is Boston Gas Company (project representative – Jesse Edmands)
2. Brief Project Description:

The proposed project is for the installation of an air sparge/soil vapor extraction system at 284 Winter Street and a temporary cap within a portion of the licensed semi-permanent boom system within the Little River adjacent to 284 Winter Street.

The air sparge system includes the installation of air sparge and soil vapor extraction wells, trenching for system piping, and the installation/placement of a control system (located within a conex box). In addition, limited excavation will be conducted to remove coal tar deposits.

The temporary cap includes the placement of (from bottom up): a reactive core mat containing organoclay attached to a 6-inch armor layer composed of stone contained within geotextile (i.e., armor mattress). The reactive core mat will reduce the generation of sheens on surface water in the river by sorbing non-aqueous phase liquid before it is released to the water column. This will help to extend the service life of the sorbent booms and reduce the appearance of sheens on surface water. Placement of the temporary cap is proposed along an approximately 275-ft linear stretch of the river, and the footprint will be limited to the footprint of the licensed semi-permanent boom system.

3. The applicant has filed a Notice of Intent ("NOI") with the Haverhill Conservation Commission seeking permission to remove, fill, dredge or alter an Area Subject to Protection Under the Wetlands Protection Act and/or Haverhill Municipal Ordinance Chapter 253 and/or to perform work within the buffer zone of such an Area.
4. The address of the lot where the activity is proposed is 284 Winter St., Haverhill MA; Parcel ID 307-2-1
   (INCLUDE ASSESSOR'S MAP/BLOCK/LOT)
5. Copies of the NOI may be examined at *the Haverhill Conservation Department Office* between the hours of *8am and 4pm* from *Monday through Friday*. Contact information is below. You may also find helpful application materials on the "Projects Under Review" section of the Commission's website.
6. Copies of the NOI may be obtained from either (check one) the applicant _____, or the applicant's representative X, by calling this telephone number (978) 712-4475 between the hours of 9:00 AM and 5:00 PM on the following days of the week Monday through Friday
7. Information regarding the *date, time, and place* of the public hearing may be obtained from the *Haverhill Conservation Department Office* between the hours of *8am and 4pm* from *Monday through Friday*. Contact information is below. You may also consult the "Agenda" section of the Commission's website.

NOTE: Notice of the public hearing, including its date, time and place, will be published at least five (5) days in advance in the *Haverhill Gazette newspaper*.

NOTE: Notice of the public hearing, including its date, time, and place, will be posted in Haverhill City Hall not less than forty-eight (48) hours in advance.

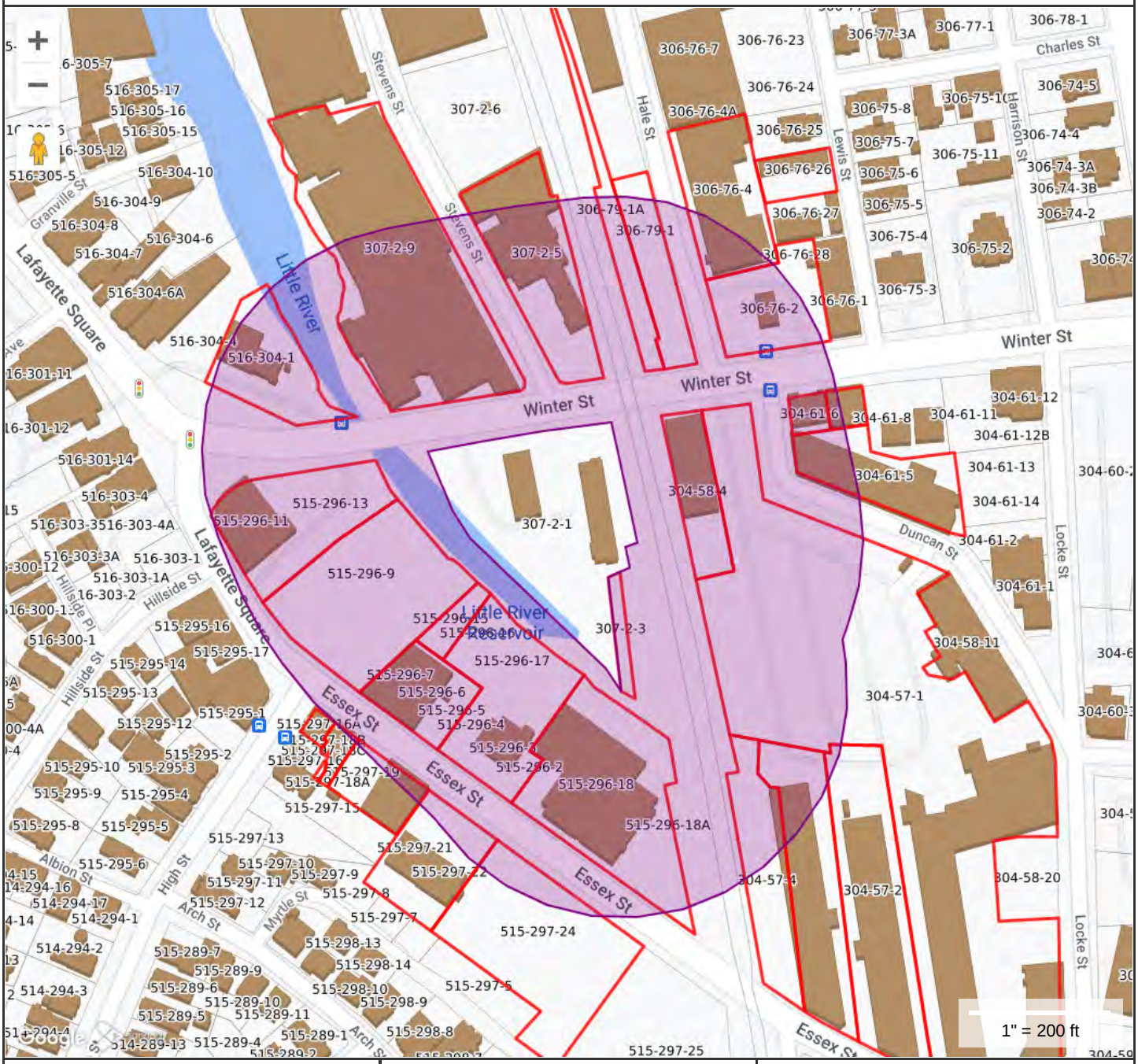
NOTE: You may contact the Haverhill Conservation Department for more information about this application, the Wetlands Protection Act, and Haverhill Municipal Ordinance Chapter 253. Please note the Department has only one staff person; every effort will be made to assist you in a timely manner.

Website: http://www.cityofhaverhill.org/departments/conservation_commission/index.php.
Email: conservation@cityofhaverhill.com
Phone: 978.374.2334

NOTE: For additional information about this application and the Act, you may contact the MA Department of Environmental Protection Northeast Regional Office Service Center.

Website: http://www.mass.gov/eea/agencies/massdep/about/contacts/northeast-region.html
Phone: 978.694.3200

Abutters Within 300 Feet of 284 Winter Street



MAP FOR REFERENCE ONLY
NOT A LEGAL DOCUMENT

City of Haverhill, MA makes no claims and no warranties, expressed or implied, concerning the validity or accuracy of the GIS data presented on this map.

Geometry updated February 5, 2019
Data updated February 4, 2019

Print map scale is approximate. Critical layout or measurement activities should not be done using this resource.