

**DRAFT Public
Involvement Plan (PIP)
Walpole Park South
Walpole, Massachusetts
RTN 3-21915**

**Submitted to:
Walpole Park South**

February 16, 2005

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RIZZO
ASSOCIATES

A TETRA TECH COMPANY

February 16, 2005

Mr. Donnell Murphy
Walpole Park South
Post Office Box 123
Walpole, MA 02081-2552

Re: DRAFT Public Involvement Plan (PIP)
Walpole Park South
Walpole, Massachusetts
RTN 3-21915

Dear Mr. Murphy:

In accordance with the requirements of the Massachusetts Contingency Plan (MCP) (310 CMR 40.0000), Rizzo Associates, Inc. has prepared this DRAFT Public Involvement Plan (PIP) for the referenced property (the Site). Based on the requirements presented in the MCP at 310 CMR 40.1405, the PIP discusses the history of the Site, local concerns, contact information, opportunities for public comment, activities to inform the public and related information.

Very truly yours,



Raymond C. Johnson, P.G., L.S.P.
Senior Vice President

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1.0 Introduction

Rizzo Associates, Inc. has prepared this DRAFT Public Involvement Plan (PIP) on behalf of Walpole Park South, in relation to the property identified as Walpole Park South (the Site). A Site Locus Plan is included as Figure 1 and a Site Plan is provided as Figure 2. The PIP has been prepared in accordance with the requirements of the Massachusetts Contingency Plan (MCP) (310 CMR 40.0000) to address the requirements presented at 310 CMR 40.1405. The Site was designated as a PIP site after receipt of a petition signed by sixteen residents of the Town of Walpole, initially submitted to the Department of Environmental Protection (DEP), and subsequently forwarded by the DEP to Walpole Park South.

The PIP process establishes a framework regarding how the public and the person conducting response actions will share information, and establishes opportunities for the public to comment on plans for assessment and cleanup. As part of the approach to facilitating public comments, a local information repository is established along with a mailing list of individuals who receive notification of milestone events and the availability of draft documents for public comment. In accordance with the MCP, this document is the DRAFT PIP that will be presented to the public at a meeting scheduled for February 16, 2005. Following the meeting a 20-day public comment period will be held to provide an opportunity for the public to review and suggest changes in the PIP. The final PIP will be completed and made available to the public, through submission to the local information repository, within 30 days of the close of the public comment period. The PIP is then implemented as the Site proceeds through the MCP process, and will be modified or revised if necessary based on information obtained during subsequent investigatory phases.

1.1 Contact Information

The party implementing the response action is Walpole Park South. The contact information for Walpole Park South is as follows:

Mr. Donnell Murphy, Trustee
Walpole Park South
Post Office Box 123
Walpole, MA 02081-2552
508-668-1200

Walpole Park South has retained a Licensed Site Professional (LSP) to manage and oversee development and implementation of the PIP, and response actions performed to address the requirements of the MCP:

Mr. Raymond C. Johnson, P.G., L.S.P.
Rizzo Associates, Inc.
1 Grant Street
Framingham, MA 01701-9005
508-903-2356

1.2 Document Organization

This document includes sections presenting the relevant information specified by the MCP, as well as Tier Classification scoring. Backup documentation from previous studies is referenced in the text as needed, and if that documentation has not been previously submitted to the DEP, it is appended to this report. The following sections are included:

Section 2	Site Background and Information
Section 3	Public Concerns
Section 4	Regulatory Framework
Section 5	Public Involvement Objectives
Section 6	Activities to Solicit Public Input
Section 7	Schedule for Public Involvement Activities
Section 8	Responsibility for Implementing the PIP
Section 9	PIP Revisions

2.0 Site Background and Information

The Site background and information summarized in the following sections has been based on our review of existing information related to the Site, including the June 4, 2004 *Phase I – Initial Site Investigation, Tier Classification and RAM Status Report* prepared by GeoHydroCycle, Inc. (GHC).

2.1 Site Description and History

The Site encompasses approximately 54 acres of land located at the intersection of US Route 1 and Pine Street in Walpole, Massachusetts as shown on Figure 1. The Site is divided into eight lots, seven of which contain buildings occupied by office and warehouse space that are leased to commercial and/or light industrial businesses. The current configuration of the Site and the configuration of the individual building lots are depicted on Figure 2. An access road, Walpole Park South Drive, crosses the Site from Route 1 to Pine Street. The buildings, driveways and parking

areas cover the majority of the Site. The remainder of the property consists of landscaped areas adjacent to the buildings, wooded land and unpaved open areas. Prior to its current use and construction of the existing buildings the Site was vacant land, portions of which were used as a gravel pit. Development of the Site and building construction commenced in approximately 1986.

2.2 Environmental Assessment History

The PIP addresses conditions associated with Release Tracking Number (RTN) 3-21915, as discussed later in this section. However, two additional RTNs have been issued to the Walpole Park South property, both of which have achieved closure through the submission of Response Action Outcome (RAO) Statements. These RTNs are discussed below.

2.2.1 RTN 3-11220

On June 30, 1994 a release of diesel fuel from a fuel tank at 24 Walpole Park South was reported to DEP as a 2-hour notification condition. Specifically, approximately 100 gallons of diesel fuel was released when a tractor trailer fuel tank was punctured during unloading of the truck. Reportedly, about 80 gallons of diesel fuel was recovered and placed in 55-gallon drums, and the remainder of the fuel was contained using absorbent pads and sand that was containerized for off-site disposal. Approximately 14 cubic yards of surficial soil was excavated from an unpaved area that was impacted by the release, and analysis of confirmatory soil samples indicated residual concentrations of total petroleum hydrocarbons (TPH) to be well below MCP reportable concentrations and Method 1 standards. After completion of response actions a Class A-2 RAO Statement was submitted to DEP by Clean Harbors Environmental Services on August 8, 1994, indicating that a Permanent Solution had been achieved for this RTN.

2.2.2 RTN 3-19859

Based on sampling performed in April 1999 and April 2000, elevated concentrations of chloroform and bromodichloromethane were detected in groundwater samples collected at the Site as part of periodic groundwater monitoring and sampling. The detected concentrations represented a 120-day notification condition under the MCP, and a Release Notification Form was submitted to the DEP on August 9, 2000. A Class B-1 RAO Statement was submitted by Carr Research Laboratory on July 25, 2001, indicating that a Permanent Solution had been achieved for this RTN. The RAO indicated that the source of the bromodichloromethane was treatment chemicals (brominating tablets) used in a residential swimming

pool located on an upgradient property. The source of the chloroform was identified as a reaction between chlorine used for swimming pool disinfection at the same residence and septage from the septic tank and leach field at the residence.

2.2.3 RTN 3-21915

In compliance with requirements issued by the Walpole Board of Health (BOH), seven groundwater monitoring wells were installed at the Site in December 1986 by Carr Research Laboratory (Carr). The wells installed at that time included two wells located on the upgradient side of the property (MW-1 and MW-2), and five wells (MW-3, MW-4, MW-5D, MW-5S and MW-6) on the downgradient portion of the Site. Wells MW-5D and MW-5S were installed as a deep/shallow well couplet, located near the northwest corner of the property. Carr performed annual groundwater sampling during the period from 1987 to 2003 as required by the BOH, and also collected samples of surface water and/or sediment in eight storm water catch basins located in the southwest portion of the Site, upgradient from monitoring well MW-6. In September 2000 two additional monitoring wells, designated MW-8 and MW-9, were installed in the southwest portion of the Site. Sampling of the catch basins and the installation and sampling of MW-8 and MW-9 were implemented as part of investigations relating to the detection of chloroform and bromodichloromethane in groundwater samples collected from MW-6 in 1999 and 2000. This condition is associated with RTN 3-19859 as discussed above. In January 2004, seven additional monitoring wells were installed by GHC (GHC-1 to GHC-7) to further characterize soil and groundwater conditions and to evaluate whether a source of the compounds detected in groundwater could be identified. Groundwater samples were collected from both new and existing wells in February and April 2004.

In April 2002 it was noted that the lead concentrations reported by the laboratory for groundwater samples collected from monitoring wells MW-3 and MW-6 were 0.059 milligrams per liter (mg/l) and 0.023 mg/l, respectively; concentrations which exceeded the MCP reportable concentration of 0.020 mg/l for groundwater classified as RCGW-1 for reporting purposes. To further evaluate this condition confirmatory groundwater sampling was performed in May 2002. The results of this sampling indicated lead concentrations in samples collected from MW-3 and MW-6 of 0.046 mg/l and 0.018 mg/l, respectively. Based on these sampling results it was concluded that the detected lead concentrations represented a 120-day notification condition under the MCP. Therefore, a RNF was prepared and received by the DEP on July 2, 2002. In response

to the notification, DEP issued a Notice of Responsibility (NOR) on August 15, 2002 and assigned RTN 3-21915 to the reported release.

Based on further review of the historic groundwater monitoring results by GHC, it was determined that additional compounds detected at concentrations exceeding the applicable RCGW-1 reportable concentrations had not been previously reported to DEP. These compounds included methylene chloride, total chromium, arsenic, tetrachloroethylene (PCE), cadmium, and antimony. Of these compounds, only lead and antimony were detected in samples collected after October 1993, the effective date of the MCP revisions which established specific reportable concentrations for oil and hazardous materials. Methylene chloride is a commonly used laboratory reagent and was only detected once at a concentration exceeding its reportable concentration, in a sample collected from MW-4 in March 1987. PCE was only detected once at a level exceeding its reportable concentration, in the sample collected from MW-1 in March 1988. Cadmium was detected above its reportable concentration once, in the sample collected in March 1991 from MW-5D. Total chromium was detected at levels exceeding its reportable concentration three times, all samples collected from MW-3, most recently in March 1991. Arsenic has been identified in samples from MW-1, MW-3 and MW-5D, but has not been reported at levels exceeding the current RCGW-1 standard since March 1988.

In general, the periodic groundwater sampling has shown that the presence of elevated levels of these compounds is sporadic and intermittent, as the detected compounds have not been present in all Site monitoring wells, and compounds detected in specific wells have not been present in all of the samples collected from those wells. In addition, it appears that some of the positive results may have been related to analysis of unfiltered samples. The results of the testing do not indicate a plume of impacted groundwater that can be clearly delineated, nor do they identify the source or sources of the detected compounds. The data do not suggest a correlation between the groundwater conditions at the Site and the activities of the tenants in the Site buildings.

In addition to the compounds noted above, bromodichloromethane and chloroform were detected in samples collected from MW-6 in April 1999 and April and June 2002. As noted previously, DEP was notified of that condition and a Class B-1 RAO Statement was submitted on July 25, 2001.

Based on historic monitoring results and the investigations implemented after submission of the RNF, a Phase I – Initial Site Investigation (Phase I) report and Tier Classification was prepared by GHC and submitted to DEP

in June 2004. The Phase I report concluded that the nature and extent of contamination does not exhibit a regular pattern, relative to both the locations of wells in which levels exceed MCP Method 1 GW-1 standards and the detection of compounds over time. Based on the Numerical Ranking Scoresheet (NRS) prepared by GHC the Site was classified as a Tier IB Disposal Site. An evaluation performed as part of the Phase I investigation concluded that the identified Site conditions did not represent an Imminent Hazard, indicating that implementation of response actions on an accelerated schedule is not necessary. In an internal memorandum dated July 9, 2004, the DEP Drinking Water Program (DWP) found that “the groundwater contamination levels at the site are all low, compared to most waste sites,” and “heavy metals have fairly low mobility in groundwater.” DEP concluded “the site does not appear to pose a threat to the Walpole municipal wells, because of the low groundwater contamination levels and the distance from the site to the wells.”

2.3 Public Involvement History

On June 22, 2004, the Massachusetts DEP received a petition signed by sixteen residents of the Town of Walpole requesting that the Site be designated as a PIP site. However, since the MCP (310 CMR 40.1404) stipulates that PIP petitions be submitted to the person responsible for conducting response actions at a Disposal Site and not directly to DEP, the DEP forwarded the PIP petition to Walpole Park South on June 24, 2004. In the letter DEP noted that a Phase I report and Tier IB permit application had been submitted to the DEP, and stated that “the site will be designated as a PIP site upon approval of the permit application and Tier Classification of the site.” DEP approved the Tier IB permit application on July 26, 2004.

On August 11, 2004, GHC submitted a letter to the petitioners providing notification that the Site had been designated as a PIP site as of July 26, 2004. On August 26, 2004 GHC contacted each petitioner by telephone to obtain input in accordance with the PIP interview process. At the request of Mr. Thomas Driscoll, a PIP Interview Meeting was held on September 1, 2004 at GHC’s office in Newton, Massachusetts to obtain input regarding issues the petitioners would like to have addressed either in the PIP, or as part of ongoing MCP response actions. As a result of the PIP Interview Meeting, and at the request of the BOH, an evaluation was conducted of the hazardous waste storage practices at the Site. A letter dated October 16, 2004, summarizing the status of the PIP process and discussing other relevant Site information, was submitted to DEP by GHC.

On October 26, 2004, a meeting was held with the BOH and Walpole Board of Sewer and Water Commissioners to discuss issues identified at the September 1, 2004 meeting, review the findings of the Phase I report, and discuss the approach and schedule for future MCP activities.

On January 27, 2005, a legal notice was published in The Walpole Times to inform the public that a meeting was scheduled for February 16, 2005 to present the draft PIP, obtain public comment, and discuss plans for future MCP-related activities at the Site. In accordance with MCP requirements, a press release was also sent to the Walpole Times regarding the scheduled PIP meeting. A letter dated January 27, 2005 was sent to the PIP petitioners, local representatives and officials (Board of Health, Town Administrator, Board of Selectman and Board of Sewer and Water Commissioners), and to State Representative Louis L. Kafka. The letter informed the recipients of the scheduled PIP meeting. After presenting the draft PIP at the meeting and obtaining input from attendees, a 20-day public comment period will be held to allow the public to review and suggest changes in the PIP. The public comment period will run from February 17 through March 8, 2005, and the final PIP will be completed and made available to the public by no later than April 7, 2005.

3.0 Public Concerns

Based on our review of the available information, the following public concerns have been identified. Additional concerns raised at the PIP meeting or during the 20-day public comment period will be identified and addressed in the Final PIP.

- Source(s) of compounds detected in groundwater at concentrations exceeding applicable MCP reportable concentrations and Method 1 standards.
- Property uses and activities prior to commencement of Site development in 1986
- Rate of groundwater flow at the Site.
- Fate and transport characteristics of compounds detected in groundwater.
- Tenant activities and materials storage.
- Overview of PIP process and what the public can expect.

- Phase II process – approach to assessment/characterization and anticipated schedule.

4.0 Regulatory Framework

The MCP and associated DEP Policies and Guidance Documents establish both a general framework and specific requirements for assessment and remediation of DEP-listed disposal sites. The overall objective of the MCP process is to characterize the source, nature and extent of releases of oil or hazardous materials; characterize the risk to health, safety, public welfare and the environment; identify whether feasible means exist to achieve a condition of No Significant Risk; and implement response actions and/or institutional controls needed to control, minimize or eliminate risk. The first step in the MCP process, including preparation of a Phase I – Initial Site Investigation report and Tier Classification have been completed, as discussed in GHC's report dated June 4, 2004.

The next step in the MCP process is the completion of a Phase II – Comprehensive Site Assessment (Phase II) pursuant to 310 CMR 40.0830, which must be submitted within two years of the effective date of the Tier IB Permit (310 CMR 40.0550(2)9b)), in this case by July 26, 2006. The Phase II is a comprehensive evaluation of the nature and extent of contamination, including efforts to characterize the source(s) of the detected compounds to the extent feasible. The Phase II is typically an iterative process, whereby data developed during the early stages of the investigation is used to refine the scope and focus of supplemental tasks needed to address the requirements of the MCP. Use of an iterative process is clearly applicable to the Site, where the presence of elevated concentrations of compounds of concern is sporadic and intermittent, and source areas are not apparent based on existing data.

The monitoring data developed during Phase II is used, along with historic information, to characterize the risk associated with a disposal site and determine whether a condition of No Significant Risk has been achieved. If risk is determined to be within acceptable limits, with or without the implementation of institutional controls (e.g., an Activity and Use Limitation (AUL)), the disposal site would be eligible for submission of a RAO Statement indicating that a Permanent Solution had been achieved. However, if risk levels exceed regulatory thresholds, a Phase III – Remedial Action Plan (Phase III) would also need to be submitted by the two-year deadline (July 26, 2006). The Phase III process entails the identification and evaluation of possible remedial actions, and determines based on technological and financial considerations whether there are one

or more feasible alternatives for mitigating the conditions which result in an elevated level of risk.

If feasible alternatives for remedial actions are identified in the Phase III report, the MCP requires that one or more alternatives be selected for implementation and a Phase IV – Remedy Implementation Plan (Phase IV), detailing the approach to implementation, submitted within three years of Tier Classification, in this case by July 26, 2007. If the Phase III process determines that feasible remedial alternatives do not exist, it is likely that a Class C RAO Statement would be submitted, indicating that a Temporary Solution has been achieved. This outcome would likely include ongoing monitoring and periodic evaluations of whether new remedial technologies have been developed that may be feasible for implementation at the Site.

4.1 Preliminary Phase II Approach and Schedule

The initial step in the Phase II investigations at the Site will be to further assess seasonal fluctuations and to evaluate whether there may be a correlation between groundwater quality and precipitation, runoff or recharge; groundwater elevation; direction of groundwater flow; or other factors, and to assess whether some of the previously reported positive analytical results may be related to sampling methodology, specifically filtered vs. unfiltered samples. To accomplish this initial testing, at least two rounds of groundwater samples will be collected from monitoring wells MW-1, MW-2, MW-3, MW-4, MW-5S, MW-5D, MW-6, MW-8, MW-9, GHC-5, GHC-6 and GHC-7 in February or March (dependant on snow cover and ability to locate wells) and May 2005. These 12 samples will be submitted for laboratory analysis for Priority Pollutant 13 metals and three samples (MW-1, MW-4 and GHC-6) will also be analyzed for VOCs. Water level measurements will be made prior to sampling to facilitate preparation of a potentiometric surface map to evaluate the rate and direction of groundwater flow. Based on the results of this testing a determination will be made of further investigatory tasks needed to address the MCP requirements for a Phase II investigation. It is anticipated that additional Phase II tasks will be implemented during the period from July 2005 through approximately May 2006, with submission of the Phase II report anticipated in July 2006.

5.0 Public Involvement Objectives

The objective of the PIP process is to inform the public of the status of ongoing response actions, provide an opportunity for the public to review and comment on MCP submittals such as the Phase II report, and obtain

public input at major milestones and events. The activities that will be undertaken to meet the objectives of the PIP process are discussed in the following sections.

5.1 Information Repositories

Information regarding conditions at the Site will be provided to the public by establishing two mechanisms for the public to access and review documents relevant to the Site. A local repository has been established at the Walpole Public Library which currently contains information submitted to DEP discussing assessment activities completed to date. Copies of reports and other documents submitted to DEP and/or the Town of Walpole will be sent to the information repository as they are developed. Documents will be scanned into a .pdf format and will be accessible through a link that will be available on the Town of Walpole home page at www.walpole.ma.us.

In addition to the local information repositories, the Massachusetts DEP files are available for review at the file review center located at 35 Congress Street, Shetland Office Park, Salem, MA. An appointment to review DEP files can be scheduled by calling 978-740-0809.

5.2 Site Mailing List

A Site mailing list has been established and includes the petitioners, Town of Walpole officials, the local state representative and the DEP. Other interested parties will be added to the mailing list by submitting a written request to be included to either Walpole Park South or Rizzo Associates. The mailing list will be used to provide notification of upcoming public meetings, provide notice of availability of draft reports and applicable public comment periods, provide notice regarding the availability of final reports or other documents relevant to the Site, and distribute other information in accordance with the requirements of the MCP. The individuals currently on the Site mailing list are noted below.

Site Mailing List

Thomas A. Driscoll
16 Old Farm Road
Walpole, MA 02081

Daniel Driscoll
16 Old Farm Road
Walpole, MA 02081

Deborah Driscoll
16 Old Farm Road
Walpole, MA 02081

Dainora Kupcinkas
19 Old Farm Road
Walpole, MA 02081

Aidas Kupcinkas
19 Old Farm Road
Walpole, MA 02081

Brian Backner
21 Briarwood Lane
Walpole, MA 02081

Mark O'Malia
20 Old Farm Road
Walpole, MA 02081

Shaunda O'Malia
20 Old Farm Road
Walpole, MA 02081

Margaret G. Trudell
15 Old Farm Road
Walpole, MA 02081

Mark E. Trudell
15 Old Farm Road
Walpole, MA 02081
Preston J. O'Toole
12 Old Farm Road
Walpole, MA 02081

Lesley Frankel
4 Old Farm Road
Walpole, MA 02081

Richard B. McGrath
3 Old Farm Road
Walpole, MA 02081

Barbara J. McGrath
3 Old Farm Road
Walpole, MA 02081

Robert J. DeSavage
11 Old Farm Road
Walpole, MA 02081

Phil Gouthro
8 Old Farm Road
Walpole, MA 02081

Representative Louis L. Kafka
Massachusetts House of Representatives
State House, Room 237
Boston, MA 02133

Karen Stromberg
Commonwealth of Massachusetts
Department of Environmental Protection
Bureau of Waste Site Cleanup
Northeast Regional Office
1 Winter Street, 9th Floor
Boston, MA 02108

Robin Chapell, Health Agent
Board of Health
Town of Walpole
135 School Street
Walpole, MA 02081

Michael E. Boynton, Town Administrator
Town of Walpole
135 School Street
Walpole, MA 02081

Michael F. Charon, Chairman
Board of Selectman
Town of Walpole
135 School Street
Walpole, MA 02081

Steven M. Davis, Chairman
Board of Sewer and Water Commissioners
Town of Walpole
135 School Street
Walpole, MA 02081

5.3 Notification to Local Officials and Residents of Major Milestones and Events

The MCP requires that the local community affected by a disposal site be notified of major planning and implementation milestones, including the following:

- The purpose, nature and duration of field work related to the implementation of Phase IV remedial actions
- The use of respirators and other protective clothing (Level A, B, or C protection)
- Sampling involving private drinking water supply wells, indoor air or surficial soil at any residential property at, adjacent to, or downgradient from contamination or suspected contamination
- Release Abatement Measures (RAM) and related RAM Completion Statements
- Immediate Response Actions (IRA) taken to address Imminent Hazards and related IRA Completion Statements
- MCP Phase reports
- RAO Statement(s)

Notification of field work will include information on the work to be conducted and its approximate duration. Notification will be made verbally or in writing at least seven days before each activity is scheduled to begin. If verbal notification is given it will be followed up in writing within seven days and concurrently copied to DEP. For IRA's not requiring a written action plan, notification shall be given as soon as possible but in all cases no later than forty-eight hours after the start of the implementation of the IRA. Notification at the end of a remedial phase

will include a summary of the phase report and information of where the report can be reviewed. The individuals to be notified include:

Robin Chapell, Health Agent
Board of Health
Town of Walpole
135 School Street
Walpole, MA 02081

Michael E. Boynton, Town Administrator
Town of Walpole
135 School Street
Walpole, MA 02081

Michael F. Charon, Chairman
Board of Selectman
Town of Walpole
135 School Street
Walpole, MA 02081

5.4 Public Meetings

Public meetings will be held to present major site documents to the public (e.g., Phase II report and, if required, Phase III through Phase V reports). Notification will be provided in advance of these meetings, and it is currently anticipated that they will be held in the Walpole Town Hall. At a minimum, meeting notice will be provided through publication of a legal notice in The Walpole Times at least 14 days in advance of the scheduled meeting date, and through mailing a copy of the legal notice to the Site mailing list.

6.0 Activities to Solicit Public Input

The public will be given the opportunity to give opinions on cleanup decisions during comment periods. Summaries of all comments received during the public comment period, and responses to those comments, will be prepared and placed in the information repository, with copies of the responsiveness summary mailed to those individuals who submitted comments.

6.1 Public Comment Periods

Walpole Park South will provide specific opportunities for public comment regarding documents prepared in relation to the Site. When a draft document has been prepared it will be available in the local information repositories (Public Library and on-line), and notification of document availability will be sent to the Site mailing list. The notice will include the title of the document, where and how it can be accessed, information describing the procedure for submitting comments, and the duration and expiration date of the comment period. At a minimum, the following types of documents will be made available for public comment. However, not all of the following categories of documents are likely to be prepared for the Site, based on current information regarding soil and groundwater conditions.

- Draft Public Involvement Plan
- Immediate Response Action (IRA)/Release Abatement Measure (RAM) Plans and status reports
- IRA/RAM Completion statements
- Draft Phase II Scope of Work
- Phase II – Comprehensive Site Assessment, including risk characterization
- Phase III – Remedial Action Plan
- Phase IV – Remedy Implementation Plan
- Plans related to the operation and maintenance of remedial systems (Phase V)
- Submittal of a RAO Statement and, if applicable, an AUL

As noted, it is unlikely that all of the above-listed documents will be required for the Site. Comments should be submitted to Rizzo Associates, Inc. and to the DEP concurrently.

6.2 Response to Comments

On behalf of Walpole Park South, Rizzo Associates, Inc. will prepare a summary of all comments received for each draft document, and the responses to those comments. A copy of the response summary will be

sent to all persons who submitted comments, placed in the information repositories, and sent to DEP for inclusion in the Site file. A notice of availability of the response summary will be sent to the persons on the Site mailing list. The summary of comments and responses will be made available prior to implementation of the response action submitted for comment or prior to undertaking the next phase of the MCP, except in the unlikely event that time-critical response actions are required.

6.3 Public Meetings

Public meetings will be held to present the findings of MCP response action phases (Phase II and subsequent phases as required). The meetings will be held in accordance with the protocols for public meetings discussed in Section 5.4.

During the meetings the public will be given the opportunity to provide comments on the specific document(s) being presented at the meeting, or the PIP process in general. Where appropriate, the comments will be addressed and responded to at the meeting. In the event that comments cannot be addressed at the meeting, they will be addressed in the “response to comments” documents discussed in Section 6.2 of this document.

7.0 Schedule for Public Involvement Activities

The draft PIP is being presented at a public meeting scheduled for February 16, 2005 at the Walpole Town Hall. Comments on the draft PIP will be received through March 8, 2005, and the final PIP will be issued on or before April 7, 2005. Where appropriate, comments will be incorporated into the PIP and addressed in the “responsiveness to comments” document located in the information repositories.

To provide the ability for public comment on Site documents, draft reports will be provided to the information repositories and a notice of availability will be sent to the Site mailing list as discussed in Section 6.1. The notice will include the title of the document, where it is available for review, information about how to submit comments, and the length of the comment period.

The following documents will be made available for public comment. This list includes a draft schedule for when these documents are scheduled to be completed. The schedule for availability of the Phase IV, Phase V, and RAO documents will be determined after completion of the Phase II

Comprehensive Site Assessment and, if necessary, the Phase III Remedial Action Plan.

Documents for Public Comment

Document	Draft Schedule of Availability
Phase II Comprehensive Site Assessment	June 15, 2006
Phase III Remedial Action Plan (if required)	June 15, 2006
Phase IV Remedy Implementation Plan	To Be Determined
Phase V Operation and Maintenance	To Be Determined
Response Action Outcome	To Be Determined

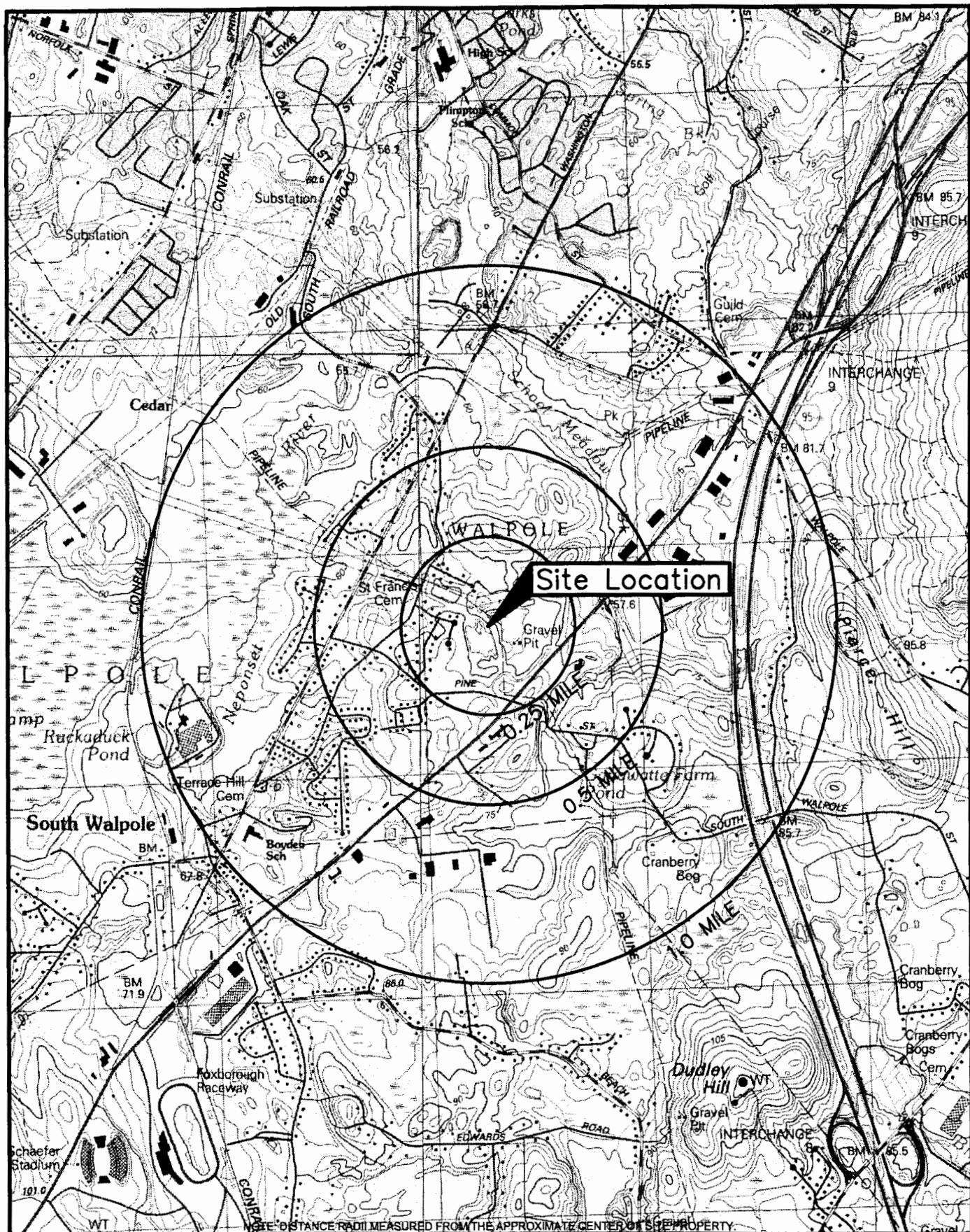
8.0 Responsibility for Implementing This Plan

Rizzo Associates, Inc. has developed this PIP and, as directed by Walpole Park South, is responsible for overseeing the implementation of the activities described in this plan during the completion of MCP phased activities.

If there are concerns by the citizens of Walpole that this PIP is not being implemented properly, the concerned individual(s) should provide Rizzo Associates, Inc. with specific information regarding the portions of the PIP they feel are not being properly implemented. If the identified concerns cannot be addressed or resolved, DEP will be asked to review the circumstances and provide input on mechanisms to resolve the issue.

9.0 PIP Revisions

The PIP may be revised as necessary during the course of the response action process. If revisions are proposed, copies of proposed changes will be placed in the location information repository and a notice will be sent to the Site mailing list informing of the changes. The notice will discuss how the changes differ from the current PIP, the basis for the proposed change, and information regarding the public comment period and method for providing comments. After expiration of the public comment period all comments will be reviewed and the PIP revised as appropriate. The final revised PIP will be placed in the information repository and a Notice of Availability of the revised plan will be sent to the mailing list.



Project No. 12700058

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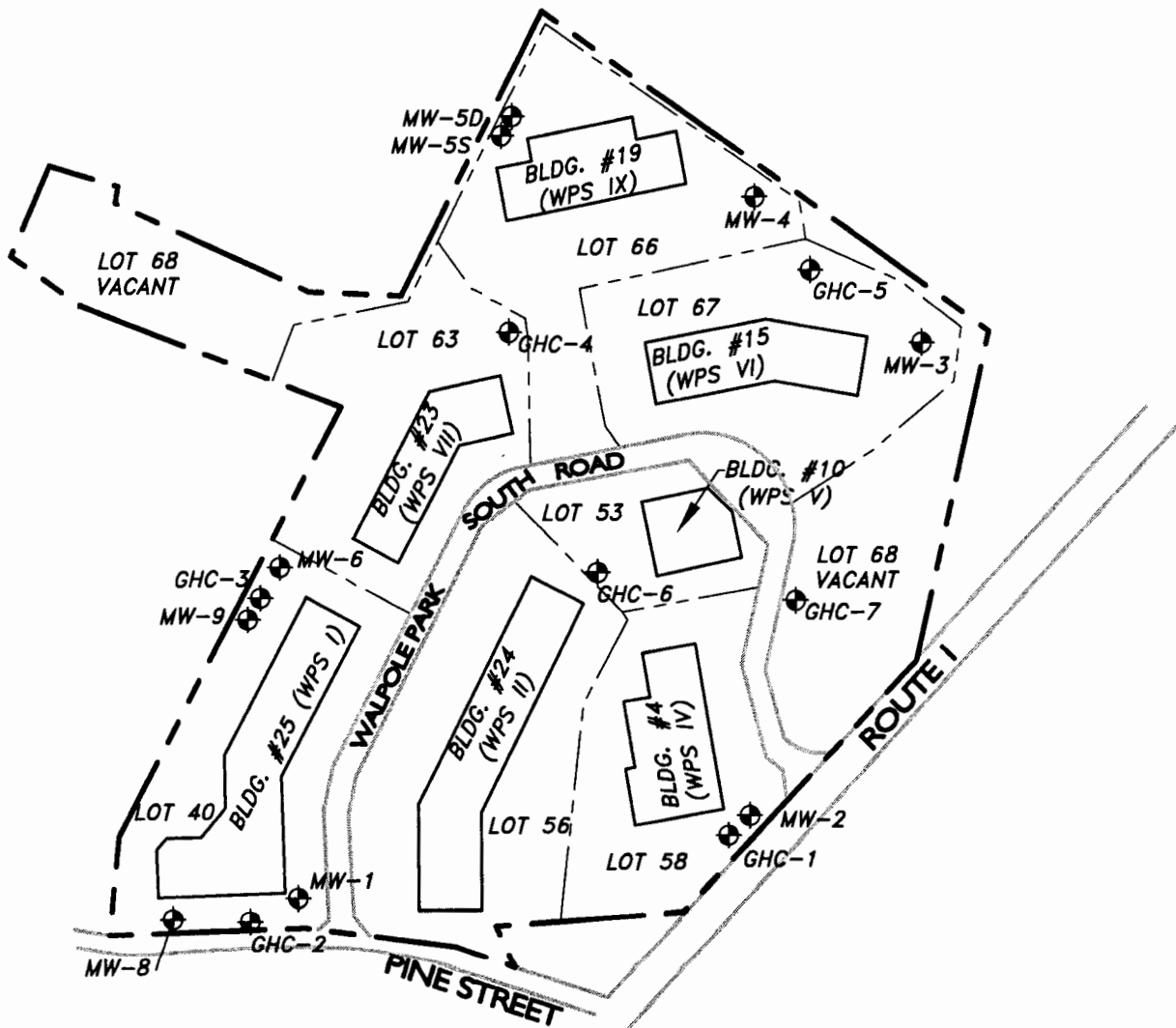
Information obtained from
USGS Map of Mansfield, Massachusetts
Quadrangle dated 1987 and
USGS Map of Norwood, Massachusetts
Quadrangle dated 1982-1985

Walpole Park South
Walpole, Massachusetts

Site Locus Plan

Figure
1

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LEGEND

-  EXISTING MONITORING WELL LOCATION
-  SITE BOUNDARY RTN 3-21915
-  LOT BOUNDARIES

12700058P-ESP01

Walpole Park South
Walpole, Massachusetts



RIZZO
ASSOCIATES
A TETRA TECH COMPANY

Site Plan by
GeoHydroCycle, Inc.
Dated 5/14/04

Site Plan with
Monitoring Well Locations

Figure
2