

**DRAFT Phase IV – Remedy Implementation Plan
Walpole Park South
Walpole, Massachusetts
Release Tracking Numbers 4-3021915**

**Submitted to:
Massachusetts Department of Environmental Protection
July 12, 2007**

July 12, 2007

Massachusetts Department of Environmental Protection
Southeast Regional Office
Bureau of Waste Site Cleanup
20 Riverside Drive
Lakeville, MA 02347

**Re: DRAFT Phase IV – Remedy Implementation Plan
Walpole Park South
Canton, Massachusetts**

Release Tracking Numbers 4-3002514 and 4-20063

Dear Sir/Madam:

On behalf of Walpole Park South, Rizzo Associates, Inc. has prepared this Phase IV – Remedy Implementation Plan for Release Tracking Number 4-3021915 pursuant to 310 CMR 40.0870. The information presented herein is based on the Phase III – Identification, Evaluation and Selection of Comprehensive Remedial Action Alternatives report dated July 26, 2007. This report is subject to the Statement of Limitations and Conditions in Appendix A. The original Massachusetts Department of Environmental Protection BWSC-108 transmittal form is attached to this report, and a copy of the form is in Appendix B.

Please contact us if you have any questions regarding this submittal.

Very truly yours,

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

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One Grant Street
Framingham, MA 01701
Tel 508.903.2000 Fax 508.903.2001

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1.0 Introduction

This Phase IV – Remedy Implementation Plan (Phase IV) report for Release Tracking Number (RTN) 4-3021915 is being submitted to the Massachusetts Department of Environmental Protection (DEP) pursuant to the Massachusetts Contingency Plan (MCP) 310 CMR 40.0870. The purpose of the Phase IV is to present detailed plans for implementation of the remedial action alternative selected based on the Phase III – Identification, Evaluation and Selection of Comprehensive Remedial Action Alternatives report (Phase III) dated July 26, 2007. The Phase III concluded, based on the current understanding of Site conditions and an evaluation of the available remedial action alternatives, that ongoing monitoring and monitored natural attenuation (MNA) was the most reasonable remedial action approach for this property (the Site).

The Site was designated as a Public Involvement Plan (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. A Draft PIP was presented during a public meeting held at Walpole Town Hall on February 16, 2005. Based on comments raised during that meeting and the public comment period, a final PIP was issued on April 6, 2005. Opportunities for public input will continue in accordance with the provisions of the PIP. Additional Phase II field investigations, including the installation of additional soil borings and groundwater monitoring wells, and the collection and analysis of soil and groundwater samples, have been implemented since mid-2005. The details of the additional testing and the results of supplemental soil and groundwater testing were presented in the Phase II – Comprehensive Site Assessment report that was submitted concurrently with the Phase III report.

1.1 Site Description

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 along the southeast boundary of Walpole Park South, to Pine Street on the southwest boundary of the property. 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 construction of the existing buildings the Site was vacant land, portions of which were reportedly used as a gravel pit. Development of the Site and building construction commenced in 1986.

The property is abutted to the north by vacant wooded land, to the west by single-family residences, to the south by Pine Street, across which are commercial properties including a truck repair and painting facility, and to the east by Route 1, across which are commercial and industrial properties.

1.2 Responsibility for Conducting the Response Actions

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

2.0 Summary of Phase II and Phase III Reports

Phase II and Phase III reports were submitted for the Site in July 2006, as summarized in the following sections.

2.1 Phase II Report

The purpose of the Phase II investigation was to obtain data to characterize the nature and extent of releases of oil and/or hazardous materials (OHM) at the Site, quantify the risks posed by such releases, and assess the need to conduct further remedial actions at the Site. The information presented in the Phase II Comprehensive Site Assessment report is summarized below.

- Monitoring wells were initially installed at the Site in December 1986 to comply with requirements issued by the Walpole Board of Health (BOH) as a part of the approval to develop the property.
- Annual groundwater sampling was performed during the period from 1987 to 2003 as required by the BOH, and 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, were also collected.
- 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.

- 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 then applicable MCP reportable concentration of 0.020 mg/l for groundwater classified as RCGW-1. 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, it was determined that additional compounds detected at concentrations exceeding then applicable RCGW-1 reportable concentrations had not been previously reported to DEP. These compounds included methylene chloride, total chromium, arsenic, tetrachloroethene (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 solvent 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 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 general, the annual 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 sampled monitoring wells, and compounds detected in specific wells have not been present in all of the samples collected from those wells. 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 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.”
- To further characterize soil and groundwater conditions at the Site, and to better evaluate the source, nature and extent of impacts to soil and groundwater, a Phase II – Comprehensive Site Assessment was implemented by Rizzo Associates. The Phase II Investigation included the installation of 7 soil borings and completion of 3 of the soil borings as groundwater monitoring wells; sampling and analysis of soil and groundwater from select soil borings and monitoring wells; surveying to determine the locations and relative elevations of each newly installed monitoring well casing; gauging of groundwater elevations to evaluate the groundwater flow direction and prepare a potentiometric surface map; and hydraulic conductivity testing of three groundwater monitoring wells.
- For the 7 soil samples submitted for laboratory analysis as a part of the Phase II investigation, no VOCs or metals were reported at concentrations above the applicable MCP method 1 standards except for a reported beryllium concentration of 0.87 mg/kg in the RIZ-2 soil boring which exceeds the Method 1 S-1/GW-1, GW-2 and GW-3 standards of 0.7 mg/kg and the Method 1 S-2/GW-1, GW-2 and GW-3 standards of 0.8 mg/kg. Naturally occurring beryllium is often found in Massachusetts at concentrations similar to that found at RIZ-2. Based on the fact that this soil sample was collected from undisturbed native soil at a depth of 15 to 17 feet below the ground surface, and soil conditions elsewhere on the Site, it is believed that the beryllium is naturally occurring and not related to a release on the Site.
- For the 36 groundwater samples that were submitted for laboratory analysis over three sampling rounds performed as a part of this Phase II investigation, VOCs and/or dissolved metals concentrations greater than one or more of the applicable MCP Method 1 standards were reported in 9 wells. Compounds exceeding the MCP Method 1 standards included bromodichloromethane, chloroform, and lead; however, the detections of these compounds are distributed around the Site, and do not indicate a specific on-site source or sources, or a plume that can be readily delineated. The reported concentrations of dissolved metals have been inconsistent over the three sampling events, a pattern that is consistent with that observed previously at the Site. Lead was identified at a concentration greater than the method detection limit in well MW-9 in only one of the four Phase II groundwater sampling events.

- Chloroform and/or bromodichloromethane were detected in three monitoring wells located on the southeast portion of the Site, near and downgradient from US Route 1. Although these compounds were previously detected on the Site they were identified in a monitoring well on the northwest property boundary, and were attributed to releases of disinfection by-products from a swimming pool on the abutting property. They have not been detected previously in wells near the southeast property boundary, and based on the well locations and direction of groundwater flow they do not appear to be related to on-site releases. Rather, they may be related to releases of chlorinated water in this area or to the use of roadway deicing compounds. Water Quality Reports for 2004 and 2005 issued by the Walpole Sewer & Water Department indicated that bromodichloromethane and chloroform are detected in samples collected from the municipal water system and state that these compounds are a “by-product of drinking water disinfection.” This is a typical occurrence in this area of Massachusetts.
- Since concentrations of several compounds in groundwater exceed the MCP Method 1 GW-1 and GW-3 standards, and the Site is located within a Zone II for a public water supply, the risk characterization concluded that a condition of No Significant Risk to human health and the environment has not been achieved at this Site for groundwater.
- The only reported exceedence of a reportable concentration for soil is the beryllium detected in one sample collected in February 2006. Although exceeding the applicable Method 1 standard, this is likely a naturally occurring background condition.
- Based on the results of the risk characterization, further Comprehensive Response Actions are necessary to attempt to achieve a Temporary Solution or a condition of No Significant Risk and a Permanent Solution at the Site.

2.2 Phase III Report

The Phase III evaluation included a review of alternative methods for treatment of groundwater to evaluate whether there are one or more financially and technically feasible remedial alternatives that could be implemented to reduce risk at the Site to a level where a Permanent Solution can be achieved, and the selection of an alternative for implementation. For the evaluation of remedial alternatives feasible technologies were considered based on their ability to address the conditions identified to date on the Site.

An initial screening evaluated nine remedial alternatives based on their ability to target these contaminant characteristics and the subsurface conditions at the Site. Alternatives evaluated during the initial screening included groundwater pump-and-treat, in-situ chemical oxidation, permeable reactive barriers, bioremediation/bio-barrier, electrical resistance heating, surfactant flushing, air sparging and vapor extraction, soil excavation and disposal/treatment, and MNA. Of these alternatives, groundwater pump-and-treat and MNA were selected for detailed evaluation.

The detailed evaluation compared the two remedial alternatives noted above in greater detail, based on the following criteria: effectiveness, reliability, difficulty, costs, risks, benefits and time

for implementation. Based on the detailed evaluation MNA was selected as the remedy for the Site. At the time the Phase III was submitted it was anticipated that while the Phase IV was not due until July 26, 2007, MNA monitoring would commence in September or October 2006.

However, because of unwillingness on the part of the Town of Walpole to cooperate with the responsible party relative to the installation of additional monitoring wells needed to implement the MNA, monitoring has not yet commenced. Specifically, a request was submitted on October 18, 2006 to the Walpole Board of Selectman for permission to install monitoring wells on the unpaved portion of the Pine Street right-of-way, located southwest and upgradient from the Site, in the event that access conditions precluded the ability to install monitoring wells on the Walpole Park South property in this area. In the event that it was necessary to install wells on Town of Walpole property they would have been located within a few feet of the Walpole Park South property boundary. A similar request was submitted to the Town of Walpole Engineering Department on November 21, 2006. On February 27, 2007, over four months after submission of the letter to the Board of Selectman, the Engineering Department requested additional information that was submitted by Tetra Tech Rizzo on March 6, 2007. On May 23, 2007, over seven months after submission of the original access request, a letter containing factually incorrect information and misrepresenting the original request was sent to Tetra Tech Rizzo by the towns' legal counsel. The letter stated that Walpole Park South would be required to indemnify the Town of Walpole "for losses resulting from the discovery of any hazardous materials within the Town right-of-way", compensate the Town for staff time and legal expenses in relation to access authorization, and pay for the installation of monitoring wells at other locations selected by the Town. While other aspects of the requirements stated in the letter may be open to negotiation, the requirement that Walpole Park South indemnify the Town of Walpole if contamination is identified on town property is excessive and unreasonable. (This position is in contrast to the rapid issuance of a permit by the Massachusetts Highway Department to install a monitoring well on MHD property adjacent to the Route 1 – Pine Street interchange.) The unwillingness of the town to provide a reasonable access agreement has delayed installation of the additional monitoring wells and the commencement of the MNA program. Walpole Park South will work to find alternative locations for the new monitoring wells that do not include the potential for installation on Town of Walpole property.

3.0 Existing Site Conditions

In general, the investigations performed to date have evaluated the physical characteristics of the Site and identified the presence of metals in soil and groundwater, and several VOCs in groundwater. The metals are compounds that can be naturally occurring and are widely found in common products used on properties near the Site. The VOCs are primarily trihalomethanes, compounds that are disinfection by-products formed by a reaction between organic material in soil or groundwater and chlorinating or brominating compounds used for disinfection, including disinfection of drinking water. Available information also documents formation of these compounds in areas where roadway deicing chemicals are used. Below is a summary of the physical characteristics and environmental fate and transport characteristics that were considered while evaluating potential alternatives for remediation of the identified VOC contamination.

3.1 Physical Characteristics

Soil borings advanced at the Site have identified primarily medium to coarse sand and gravel with occasional layers of fine sand overlying bedrock at the Site. The depth to bedrock ranges from approximately 13 feet below the ground surface (bgs) in the southwest portion of the Site, to greater than 40 feet bgs on the northern and eastern portions of the Site.

The depth to groundwater at the Site has been measured at depths ranging from 5 to 18 feet below the ground surface. The direction of groundwater flow in overburden at the Site is generally to the east and northeast, toward School Meadow Brook.

3.2 Environmental Fate and Transport

The metals that have been detected in groundwater at the Site, although they exceed the applicable MCP Method 1GW-1 standards, are present at relatively low concentrations and generally have limited mobility in groundwater. This fact is substantiated by the comments made by DEP in July 2004 as previously discussed in this document. The VOCs identified at the Site are more mobile than metals in the subsurface due to their solubility and volatility, but are expected to rapidly attenuate over a relatively short distance. Movement of dissolved phase VOCs is influenced by advective flow, although factors such as adsorption and dispersion can result in retardation such that VOCs migrate at a slower rate than the ambient groundwater velocity. Dense non-aqueous phase liquids (DNAPL) have not been observed at the Site, and the relatively low concentrations and specific compounds detected make the likelihood that DNAPL is present extremely low. Further, since these compounds are usually generated as disinfection by-products, or by reactions associated with roadway deicing compounds, they are by nature only present in the dissolved phase.

Based on the extensive subsurface testing completed to date, it does not appear that there is a specific on-site source of the identified compounds, nor is there a clearly definable plume.

4.0 Remedy Implementation Plan

Based on the results of the Phase III, MNA will be implemented at the Site to further characterize groundwater conditions over time. Although MNA has been identified as the appropriate remedial action for the Site, as additional data on groundwater conditions is developed it may be determined that implementation of one or more other technologies should be considered. In that case, feasible remedial alternatives will be evaluated and a determination made of whether the approach should be modified or changed. If changes to the remedial program are determined to be applicable, supplemental Phase III and Phase IV reports will be prepared to discuss the selection (Phase III) and design (Phase IV) of the remedy or remedies.

4.1 Technical Basis for Remedy Selection

As discussed in the Phase III report, based on the current understanding of Site conditions and an evaluation of the available remedial action alternatives, MNA was selected as the remedial action

approach for the Site. This approach allows the evaluation of groundwater conditions at a reasonable cost, and will allow for ongoing characterization of changes over time. This approach is appropriate given the sporadic and intermittent detection of metals or VOCs at concentrations exceeding applicable MCP standards, and the absence of an identifiable source(s) of the detected compounds.

4.2 Remedial System Engineering Concepts and Design Criteria

The remedial design for the MNA includes the installation of additional monitoring wells upgradient from the Site, and the collection of groundwater samples from the new wells and selected existing on-site monitoring wells.

4.2.1 Remedial Action Goals

The goals of this remedy are the following:

- Continued and more detailed characterization of the presence and concentrations of metals and VOCs in groundwater over time; and
- Evaluate potential off-site contribution to the detected metals and VOCs.

4.2.2 Changes/New Information

There have been no significant changes or new information pertaining to soil or groundwater conditions at the Site since submission of the Phase II and Phase III reports in July 2006.

4.2.3 Planned MNA Approach

The approach to MNA at the Site is to characterize groundwater conditions at and near the upgradient property boundaries to evaluate whether a portion or all of the metals or VOCs detected in on-site monitoring wells originate from off-site source(s) and/or if they are naturally occurring, and to continue to evaluate the sporadic and intermittent detection of these compounds on the Site. It is planned that three new monitoring wells, located at or near the upgradient property line to Walpole Park South, will be installed near the southwest property boundary. The approximate locations of these wells are shown on Figure 2. These wells, and selected on-site wells, will be sampled on a regular basis, initially every 4 months, and the samples analyzed for VOCs and metals. The on-site wells that will be initially included in the sampling program include MW-2, MW-3, MW-9, GHC-6 and RIZ-3. These wells were selected based on historic monitoring results and the fact that in conjunction with the new wells they will allow an evaluation to be made of groundwater conditions across the boundaries of the Walpole Park South property. Based on the analysis results and field observations, modifications to the sampling frequency, number of wells, analytical methods, and/or wells sampled may be made. Changes to the sampling plan will be documented in Phase IV status reports.

4.2.4 Control and Containment Measures

Since the activities planned for the Site are limited to the installation of new monitoring wells and periodic collection of groundwater samples, there is limited potential for spills, accidental discharges or other uncontrolled releases. Soil and groundwater generated in conjunction with remedy implementation will be managed in accordance with the procedures discussed in Section 4.2.5.

4.2.5 Disposal of Remediation Wastes

During monitoring well installation soil will be screened in the field using a photoionization detector (PID) and stored either in 55-gallon drums or placed on and covered with polyethylene sheeting. Soil samples will be analyzed for metals and VOCs, and if compounds are present at concentrations exceeding applicable reportable concentrations and/or Method 1 standards they will be transported for off-site disposal. Soil management if compounds are not present at concentrations exceeding applicable reportable concentrations or Method 1 standards will be performed in accordance with the “non-degradation” provisions of the MCP.

Groundwater generated during purging and sampling of monitoring wells will be containerized during sampling and either returned to the monitoring well in accordance with the MCP, or stored on-site for characterization and off-site disposal.

4.2.6 Avoidance of Deleterious Impacts

Deleterious impacts are not anticipated since the planned remedial action is limited to installation of additional monitoring wells and collection of groundwater samples.

4.2.7 Site-Specific Characteristics

Because of the minimal impacts associated with the proposed monitoring, no adverse impacts to Site activities or operations are anticipated.

4.3 Operation, Maintenance and Monitoring Plan

In general, very little maintenance is associated with the efforts described herein. Monitoring well road boxes/protective covers will be maintained and repaired as necessary, and monitoring wells will be redeveloped if needed based on observations during purging and sampling

4.4 Health and Safety Plan

The existing site-specific Health and Safety Plan (HASP) will be revised to reflect the hazards associated with the work described herein. This HASP will be for Tetra Tech Rizzo personnel and subcontractors working directly for Tetra Tech Rizzo. Other parties involved in the work, if any, are required to prepare a separate HASP for their purposes.

4.5 Implementation Schedule

It is the intent of Walpole Park South to commence the implementation of the work as soon as possible after submission of the Phase IV, pending the ability to access planned monitoring well locations adjacent to Pine Street. Assuming that there are no impediments associated with installing wells on Walpole Park South property adjacent to Pine Street, it is anticipated that the new monitoring wells will be installed no later than October 1, 2007, and the collection of groundwater samples will commence in mid-October 2007. This schedule may be modified based on site specific conditions and observations made during the initial phases of implementation, or if required because of access issues.

Task	Time to Complete	Time Elapsed
Installation of additional monitoring wells	4 to 6 weeks (estimated, including access authorization, etc.)	4 to 6 weeks
Initial round of groundwater sample collection	1 to 2 weeks	7 to 8 weeks
Review and evaluation of monitoring results	2 weeks	9 to 10 weeks
Subsequent monitoring and sampling events	Every 4 months	
Status Report	Submitted at 6 month intervals per MCP requirements	

5.0 Permits and Approvals

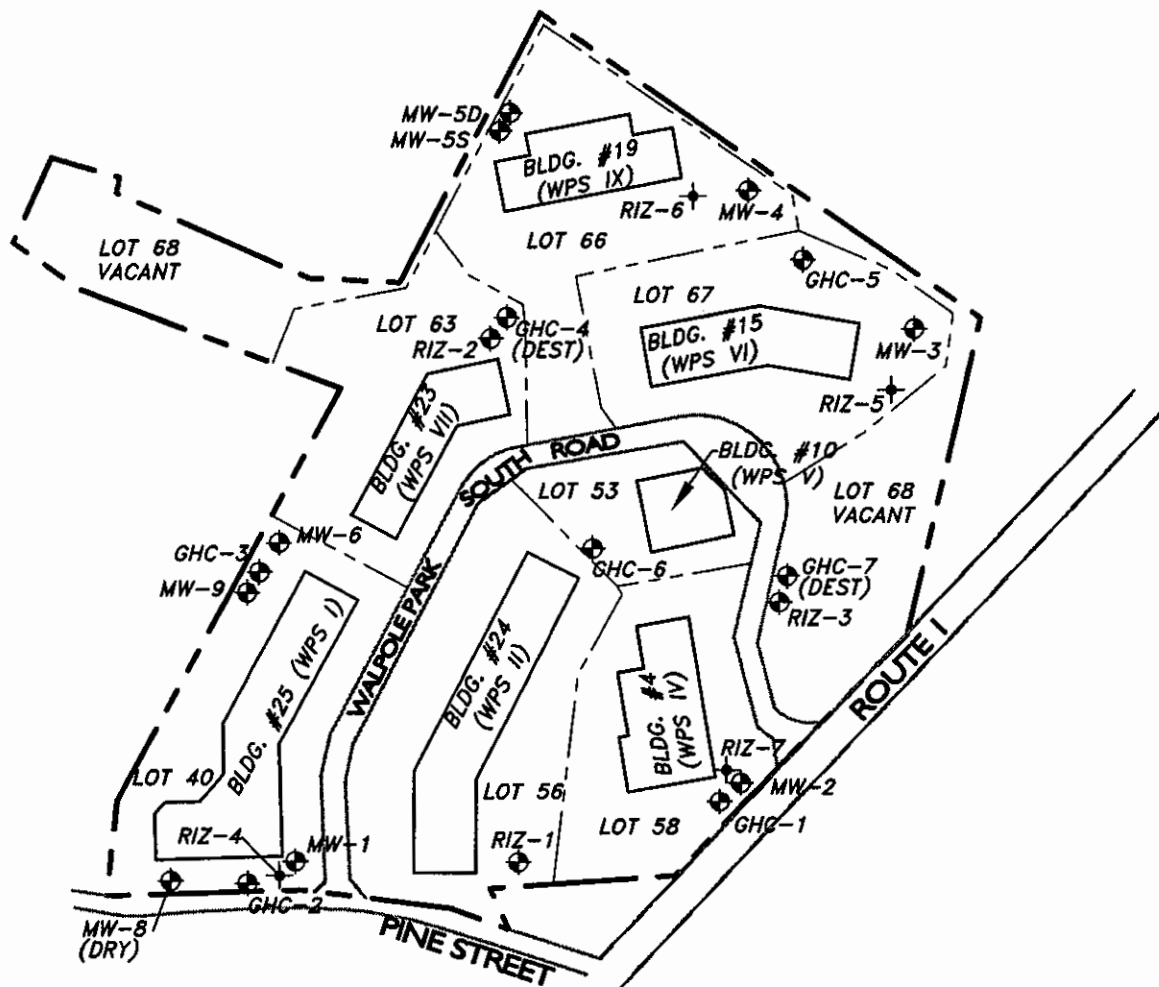
A permit has been issued by the Massachusetts Highway Department for installation of a monitoring well near the intersection of Route 1 south and Pine Streets. No other permits or approvals are required to implement the work described herein. However, it will be necessary to access Walpole Park South property from Pine Street to install several monitoring wells on Walpole Park South property, and it will likely be necessary to occupy a portion of Pine Street during well installation activities. While in most cases the need to temporarily occupy a portion of a roadway to install monitoring wells on private property would not be considered a possible impediment to completing that task, considering the response on the part of the Town of Walpole to a previous request to potentially install monitoring wells within the unpaved portion of the Pine Street right-of-way suggests that this process may be more difficult than usual.

6.0 Public Notifications

Pursuant to the requirements of the MCP, notices of the submission of this Phase IV report have been sent to the Walpole Board of Health and Chief Municipal Officer. Copies of the public notification letters are included in Appendix C. A copy of the Phase IV report has also been submitted to the Public Information Repository at the Walpole Public Library. A copy of the Phase IV Transmittal Form (BWSC-108) is included as Appendix B.



Figure
1



LEGEND

- ✦ SOIL BORING LOCATION
- ◆ RECENTLY INSTALLED MONITORING WELL LOCATION
- ◊ EXISTING MONITORING WELL LOCATION
- (DEST) DESTROYED OR UN-LOCATABLE MONITORING WELL
- (DRY) INSUFFICIENT WATER FOR SAMPLE COLLECTION
- SITE BOUNDARY RTN 3-21915
- LOT BOUNDARIES

12700058P-ESP01



RIZZO
ASSOCIATES
A TETRA TECH COMPANY

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

Walpole Park South
Walpole, Massachusetts

Site Plan with Soil Boring
and Monitoring Well
Locations

Figure
2

Appendix A

Statement of Limitations and Conditions

Appendix B

BWSC-108 – Phase IV Transmittal Form



Massachusetts Department of Environmental Protection

eDEP Transaction Copy

Here is the file you requested for your records.

To retain a copy of this file you must save and/or print.

Username: **RCJOHNSON57**

Transaction ID: **136062**

Document: **BWSC Comprehensive Response Action Transmittal**

Size of File: **123.863 K**

Status of Transaction: **WORK IN PROGRESS**

Date and Time Created: **7/6/2007::12:10:37 PM**

Note: This file only includes forms that were part of your transaction as of the date and time indicated above. If you need a more current copy of your transaction, return to eDEP and select to "Download a Copy" from the Current Submittals page.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC108

COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT

Release Tracking Number

4 - 3021915

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

A. SITE LOCATION:

1. Site Name: ROUTE 1 AND PINE ST

2. Street Address: 15 WALPOLE PARK S

3. City/Town: WALPOLE

4. ZIP Code: 02081-0000

5. UTM Coordinates: a. UTM N: 4664551 b. UTM E: 314471

☒ 6. Check here if a Tier Classification Submittal has been provided to DEP for this disposal site.

☐ a. Tier IA ☒ b. Tier IB ☐ c. Tier IC ☐ d. Tier II

7. If applicable, provide the Permit Number: _____

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

- ☐ 1. Submit a Phase I Completion Statement, pursuant to 310 CMR 40.0484.
- ☐ 2. Submit a Revised Phase I Completion Statement, pursuant to 310 CMR 40.0484.
- ☐ 3. Submit a Phase II Scope of Work, pursuant to 310 CMR 40.0834.
- ☐ 4. Submit an Interim Phase II Report. This report does not satisfy the response action deadline requirements in 310 CMR 40.0500.
- ☐ 5. Submit a final Phase II Report and Completion Statement, pursuant to 310 CMR 40.0836.
- ☐ 6. Submit a Revised Phase II Report and Completion Statement, pursuant to 310 CMR 40.0836.
- ☐ 7. Submit a Phase III Remedial Action Plan and Completion Statement, pursuant to 310 CMR 40.0862.
- ☐ 8. Submit a Revised Phase III Remedial Action Plan and Completion Statement, pursuant to 310 CMR 40.0862.
- ☒ 9. Submit a Phase IV Remedy Implementation Plan, pursuant to 310 CMR 40.0874.
- ☐ 10. Submit a Modified Phase IV Remedy Implementation Plan, pursuant to 310 CMR 40.0874.
- ☐ 11. Submit an As-Built Construction Report, pursuant to 310 CMR 40.0875.
- ☐ 12. Submit a Phase IV Status Report, pursuant to 310 CMR 40.0877.
- ☐ 13. Submit a Phase IV Completion Statement, pursuant to 310 CMR 40.0878 and 40.0879.

Specify the outcome of Phase IV activities: (check one)

- ☐ a. Phase V Operation, Maintenance or Monitoring of the Comprehensive Remedial Action is necessary to achieve a Response Action Outcome.
- ☐ b. The requirements of a Class A Response Action Outcome have been met. No additional Operation, Maintenance or Monitoring is necessary to ensure the integrity of the Response Action Outcome. A completed Response Action Outcome Statement and Report (BWSC104) will be submitted to DEP.
- ☐ c. The requirements of a Class C Response Action Outcome have been met. No additional Operation, Maintenance or Monitoring is necessary to ensure the integrity of the Response Action Outcome. A completed Response Action Outcome Statement and Report (BWSC104) will be submitted to DEP.
- ☐ d. The requirements of a Class C Response Action Outcome have been met. Further Operation, Maintenance or Monitoring of the remedial action is necessary to ensure that conditions are maintained and that further progress is made toward a Permanent Solution. A completed Response Action Outcome Statement and Report (BWSC104) will be submitted to DEP.

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



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC108

**COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT**

Release Tracking Number

4 - 3021915

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

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

- ☐ 14. Submit a **Revised Phase IV Completion Statement**, pursuant to 310 CMR 40.0878 and 40.0879.
- ☐ 15. Submit a **Phase V Status Report**, pursuant to 310 CMR 40.0892.
- ☐ 16. Submit a **Remedial Monitoring Report**. (This report can only be submitted through eDEP.)
- a. Type of Report: (check one) ☐ i. Initial Report ☐ ii. Interim Report ☐ iii. Final Report
- b. Frequency of Submittal: (check all that apply)
- ☐ i. A Remedial Monitoring Report(s) submitted monthly to address an Imminent Hazard.
- ☐ ii. A Remedial Monitoring Report(s) submitted monthly to address a Condition of Substantial Release Migration.
- ☐ iii. A Remedial Monitoring Report(s) submitted concurrent with a Status Report.
- c. Status of Site: (check one) ☐ i. Phase V ☐ ii. Remedy Operation Status ☐ iii. Class C RAO
- d. Number of Remedial Systems and/or Monitoring Programs:

A separate BWSC108A, CRA Remedial Monitoring Report, must be filled out for each Remedial System and/or Monitoring Program addressed by this transmittal form.

- ☐ 17. Submit a **Remedy Operation Status**, pursuant to 310 CMR 40.0893.
- ☐ 18. Submit a **Status Report to maintain a Remedy Operation Status**, pursuant to 310 CMR 40.0893(2).
- ☐ 19. Submit a **Modification of a Remedy Operation Status**, pursuant to 310 CMR 40.0893(5).
- ☐ 20. Submit a **Termination of a Remedy Operation Status**, pursuant to 310 CMR 40.0893(6).
- ☐ 21. Submit a **Phase V Completion Statement**, pursuant to 310 CMR 40.0894.

Specify the outcome of Phase V activities: (check one)

- ☐ a. The requirements of a Class A Response Action Outcome have been met. No additional Operation, Maintenance or Monitoring is necessary to ensure the integrity of the Response Action Outcome. A completed Response Action Outcome Statement (BWSC104) will be submitted to DEP.
- ☐ b. The requirements of a Class C Response Action Outcome have been met. No additional Operation, Maintenance or Monitoring is necessary to ensure the integrity of the Response Action Outcome. A completed Response Action Outcome Statement and Report (BWSC104) will be submitted to DEP.
- ☐ c. The requirements of a Class C Response Action Outcome have been met. Further Operation, Maintenance or Monitoring of the remedial action is necessary to ensure that conditions are maintained and/or that further progress is made toward a Permanent Solution. A completed Response Action Outcome Statement and Report (BWSC104) will be submitted to DEP.
- ☐ 22. Submit a **Revised Phase V Completion Statement**, pursuant to 310 CMR 40.0894.
- ☐ 23. Submit a **Post-Class C Response Action Outcome Status Report**, pursuant to 310 CMR 40.0898.

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



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC108

COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT

Release Tracking Number

4 - 3021915

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

C. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B indicates that a **Phase I, Phase II, Phase III, Phase IV or Phase V Completion Statement** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B indicates that a **Phase II Scope of Work or a Phase IV Remedy Implementation Plan** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B indicates that an **As-Built Construction Report, a Remedy Operation Status, a Phase IV, Phase V or Post-Class C RAO Status Report, a Status Report to Maintain a Remedy Operation Status and/or a Remedial Monitoring Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP #: 6118

2. First Name: RAYMOND C

3. Last Name: JOHNSON

4. Telephone: 5089032000

5. Ext.:

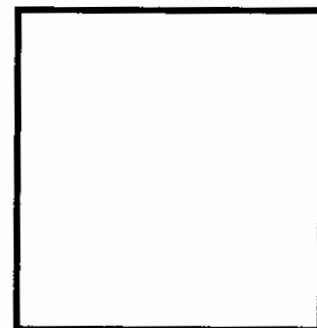
6. FAX:

7. Signature:

8. Date:

(mm/dd/yyyy)

9. LSP Stamp:





Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC108

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Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

D. PERSON UNDERTAKING RESPONSE ACTIONS:

1. Check all that apply: ☐ a. change in contact name ☐ b. change of address ☐ c. change in the person undertaking response actions
2. Name of Organization: **WALPOLE PARK SOUTH TRUST**
3. Contact First Name: **DONNELL** 4. Last Name: **MURPHY**
5. Street: **PO BOX 123** 6. Title: **TRUSTEE**
7. City/Town: **WALPOLE** 8. State: **MA** 9. ZIP Code: **02081-0000**
10. Telephone: **5086681200** 11. Ext.: 12. FAX:

E. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RESPONSE ACTIONS:

- ☒ 1. RP or PRP ☒ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter
☐ e. Other RP or PRP Specify:
- ☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ 4. Any Other Person Undertaking Response Actions Specify Relationship:

F. REQUIRED ATTACHMENT AND SUBMITTALS:

- ☐ 1. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
- ☒ 2. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of any Phase Reports to DEP.
- ☐ 3. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the availability of a Phase III Remedial Action Plan.
- ☒ 4. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the availability of a Phase IV Remedy Implementation Plan.
- ☐ 5. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of any field work involving the implementation of a Phase IV Remedial Action.
- ☐ 6. If submitting a Modification of a Remedy Operation Status, check here to certify that a statement detailing the compliance history, as per 310 CMR 40.0893(5), for the person making this submittal is attached.
- ☐ 7. If submitting a Modification of a Remedy Operation Status, check here to certify that written consent of the person who submitted the Remedy Operation Status submittal, as per 310 CMR 40.0893(5), is attached.
- ☐ 8. Check here if any non-updatable information provided on this form is incorrect, e.g. Site Name. Send corrections to the DEP Regional Office.
- ☐ 9. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



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Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

G. CERTIFICATION OF PERSON UNDERTAKING RESPONSE ACTIONS:

1. I, **DONNELL MURPHY**, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By: 

Signature

3. Title: **TRUSTEE**

4. For: **WALPOLE PARK SOUTH TRUST**

(Name of person or entity recorded in Section D)

5. Date: 
(mm/dd/yyyy)

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

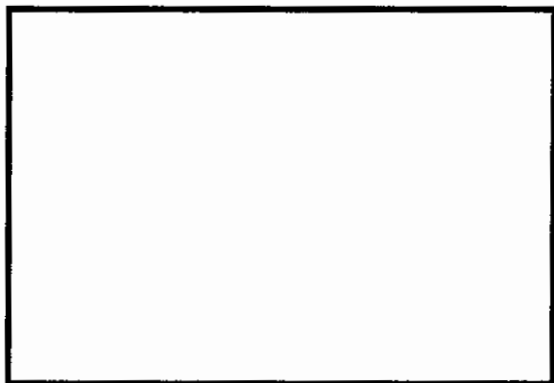
7. Street: _____

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

11. Telephone: _____ 12. Ext.: _____ 13. FAX: _____

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

Date Stamp (DEP USE ONLY:)



Appendix C
Public Notification Letters