DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: **Clean Harbors of Natick, Inc.**
Facility Address: **10 Mercer Road, Natick, MA**
Facility EPA ID #: **MAD980523203**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

   __Y__ If yes - check here and continue with #2 below.

   _____ If no - re-evaluate existing data, or

   _____ if data are not available, skip to #8 and enter"IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

FACILITY INFORMATION

References. References used for this determination include the reports listed below:

Remedial Investigation Report, Phase I: Hydrogeologic Evaluation (June 9, 1989)
Remedial Investigation Report, Phase II: On-site Contaminant Evaluation (June 19, 1989)
Remedial Investigation Report Phase III-Off-site Contaminant Evaluation (December 30, 1992)
Data Validation Summary Report (August 19, 1997)
RCRA Corrective Action Environmental Indicator Determination (June 29, 1999)
Response to USEPA Letter dated September 23, 1999 "Comments on June 29, 1999 EI Determination" (9/29/99)
Revised Final RFI Scope of Work (February 2, 2001)
Transmittal of Preliminary Data for EI Determination (September 17, 2002)

Site History/Background

The Clean Harbors Natick (CHN) facility is a former hazardous waste storage facility located in an industrial park off Route 9 in Natick, MA. The site consists of an approximately 10,000 square foot single story building with a concrete slab foundation on an approximately 1 acre lot. The majority of the site is paved, with a grass lawn in front of the building, a small strip of grass on the east side of the building, and a wooded area bordering the southern property boundary. The building and portions of the parking lot are surrounded by a chain link fence. A small building which houses the groundwater pump and treat and SVE system is located at the southeastern portion of the property. The facility was used to receive and store hazardous wastes until they were shipped off for treatment or disposal.

The building was constructed in 1960 and initially used as a repair and distribution center for

copying equipment. During the course of equipment repair, it is likely that waste streams, including VOC solvents used for degreasing and de-inking of equipment, were generated. Since the municipal sewer was available at the time of building construction, it is likely that waste streams were discharged to the sewer. Between 1976 and the present, property ownership transferred several times, but the site was consistently used as a hazardous waste storage and transfer facility. Clean Harbors began operations on the site in 1985. In July 1986, MADEP issued a RCRA permit, and EPA issued a HSWA Corrective Action permit. All hazardous wastes were removed from the building in 1999 when the business was shut down. The facility has been vacant for several years. Clean Harbors recently relinquished its Part B permit, and is now in post closure.

Site Geology and Hydrogeology

The site is located in an area of fill overlying mixed sand and gravel deposited in glacial lake Charles. The site stratigraphy consists of 9-24 feet of fine sand underlain by 8-22 feet of silt and clay which acts as an aquitard to vertical groundwater flow. Underlying the silt and clay is 12 to 28 feet or more of medium to coarse sand. Bedrock, mapped as part of the Cherry Brook Formation which includes volcanic and metamorphic rocks, is located at least 60 feet below grade.

Surface water within one mile of the facility includes a drainage swale located approximately 180 feet north of the site on the opposite side of Mercer Road, a wetland area about 1,000 yards north of the site, and Lake Cochituate, located about one mile to the east-northeast. The nearest residence is approximately 1,000 feet away. Drinking water for the town of Natick is from four municipal well fields, two of which are located about one mile away on the eastern banks of Lake Cochituate.

The water table is located approximately 6 to 8 feet below grade. Groundwater flow across the site is to the northeast. Groundwater flow is slightly downward near the southern property boundary. As groundwater moves across the site, vertical gradients are negligible or slightly upward. The hydraulic conductivity in the upper and lower sand layers are orders of magnitude higher than in the silt/clay layer. Flow through the sand layers is horizontal, to the northeast, with little vertical component. Groundwater in the upper aquifer intersects the sewer line in Mercer Road, and only intermittently intersects the drainage swale to the north of the site. Groundwater in the lower aquifer flows in the direction of Lake Cochituate.

Two utility lines (water and sewer) are buried under Mercer Rd. The water line is at a depth of 6 feet; the sewer line extends to at least 12 feet below grade. The sewer line, which slopes to the east down Mercer Road, is encased in gravel bedding material which fully penetrates the upper fine sand unit and likely impacts the flow of groundwater. It is believed that the sewer line acts as a preferential pathway, with groundwater flowing into the more highly transmissive bedding material in the sewer line and moving down the sewer line to the east.

SWMUs

Four SWMUs were identified in the 1986 HSWA Permit: the container storage area; a former 5,000 gallon UST located south of the building; the loading dock area that services the containerized storage area; and a former above ground fiberglass storage tank which was removed in 1984.

The former 5,000 gallon UST was installed in 1976 and removed in 1985. The UST was used for storage of liquid hazardous wastes. A Petro-Tite tank test was performed on the UST in 1983. Test results did not indicate that the tank was leaking. Based on these and other results, CHN concluded that the UST did not leak, but that the contaminated soils were the result of prior waste management activities. The contaminated soils area is approximately 40 by 60 feet in area, and approximately 10 to 12 feet deep. In 1993, CHN constructed a groundwater pump and treat and Soil Vapor Extraction (SVE) system to remediate soils and groundwater in this area.

Site Investigations and Interim Measures

Numerous phases of investigation and remedial actions have been conducted at the site. Some of the major activities and reports are summarized below.

Initial site investigations were conducted in 1984, 1985, and 1986. In 1985, the 5,000 gallon UST was removed. Contaminated soils excavated from around the tank were later placed back in the excavation and covered with plastic sheeting followed by 2 to 3 feet of clean fill. Crushed stone was placed to grade above the fill. Soil and groundwater samples were collected in the area.

On July 31, 1986 the HSWA Permit became effective.

In the fall of 1988, CHN's consultant Balsam performed the first phase of RFI field work. On June 9, 1989, CHN submitted the revised Remedial Investigation Report (RIR) Phase I: Hydrogeologic Evaluation. On June 19, 1989, CHN submitted the RIR Phase II: On-Site Contamination Evaluation. An addendum to the Phase II Report was submitted on June 19, 1991. Results of the Phase I and Phase II reports indicated that groundwater contaminated with dissolved VOCs was migrating from a contaminated soil source area in the vicinity of the former UST. A groundwater plume appeared to extend from the source area, under the building, to the northeast corner of the property. The extent of the plume off-site was unknown. Contaminated groundwater was confined to the uppermost fine sand layer by the underlying, less permeable silt/clay layer. The VOC contaminated soil source area was located under the paved parking lot, and was estimated to encompass a 40 by 60 foot area extending from approximately 3 to 12 feet in depth. The soils were contaminated primarily with PCE, ethylbenzene, benzene, toluene, xylenes, TCE, and 1,1,1-TCA. Groundwater was contaminated with the same compounds and 1,2-dichloroethylene. The Phase II report concluded that the magnitude of groundwater and soil contamination warranted remediation.

On May 28, 1992, CHN submitted the Final Design Report, Interim Corrective Measure, and in 1993, CHN constructed a remediation system to remediate soils and groundwater in the area of the former UST. The system consisted of a groundwater extraction system (started up in August

1993) to provide hydraulic control of the migration of VOCs and to lower the water table in the source area, combined with a Soil Vapor Extraction system (SVE), which started up in January 1994. Monthly, and then quarterly compliance reports were submitted to EPA until the systems were shut down in June 1996.

On December 30, 1992, CHN submitted the RIR Phase III: Off-Site Contaminant Evaluation. Three shallow wells and one deep well were installed off-site, north of Mercer Road. Groundwater sampling results picked up low levels of methylene chloride and 2-Butanone, which were believed to be a laboratory artifact. No other VOCs were detected in the off-site wells. Groundwater north of the site was determined to be flowing to the southeast. Therefore, groundwater from both on-site and off-site converges at the sewer line which acts as a groundwater sink. The report concluded that the sewer line, which slopes to the east, was acting as a preferential pathway, and that groundwater entering the utility line bedding material was likely flowing down Mercer Road in an easterly direction.

On November 26, 1996, CHN submitted a revised Scope of Work for Additional Site Activities. Pursuant to this SOW, CHN performed investigations including the following: two wells were installed upgradient of OW-13 along the southwest property line of 12 Mercer Road; three wells were installed within the sewer line backfill in Mercer Road; and all existing on-site monitoring wells were sampled and analyzed for VOCs.

The soil and groundwater sampling results from these activities were submitted to EPA in the Data Validation Summary Report, dated August 19, 1997, and included ground water samples collected in 1995, 1996, and 1997, and soil samples collected in 1997. The results indicated that groundwater samples collected from wells upgradient of the former UST area were non-detect. Samples collected from the groundwater pump and treat system recovery wells varied. In 1996, 1,900 ppb of chloroform was detected in recovery well RW-1. The 1997 results were non detect for all three recovery wells. Samples collected from the eastern side of the building, near the eastern property boundary had consistently low levels of 1,1-DCA (highest was 17 ppb). On the northern side of the building, OW-12 consistently showed low levels of 1,1-DCA (11 ppb). In addition, 10 ppb of vinyl chloride was detected in OW-12 in the 1997 sampling round. OW-13 contained consistently high levels of trans 1,2-DCE (up to 680 ppb), and moderate levels of BTEX (850 ppb). Vinyl chloride was detected at 51 ppb inn OW-13 in 1997. Of the three wells installed in the sewer line backfill in Mercer Road, CHI-3 (upgradient) and CHI-5 (downgradient) were non-detect. The groundwater sample from well CHI-4, which is located in the sewer backfill directly downgradient from the groundwater plume, detected 73 ppb acetone and 17 ppb MTBE.

Current Site Conditions

The site is currently inactive and the building is empty. A chain link fence surrounds the building and part of the parking lot. The groundwater pump and treat/SVE system operated at the site for 2.5 to 3 years until it shutdown in 1996. The total mass of VOCs removed from groundwater and soils is not known, but results of groundwater and soil sample analysis conducted after the system began operation indicates lower levels of VOCs in both groundwater

and soils.

During the summer of 2002, CHN's contractor GeoInsight conducted another phase of groundwater investigations, including installation of additional shallow and deep wells off site and collection of groundwater samples from most on and off-site wells. The data and several contour maps were submitted to EPA in September 2002 for use in this EI Determination. The data is currently being validated and will be incorporated into an RFI report due to be submitted later this year.

2. Is **groundwater** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

__X_ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

___ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

Footnotes:

[1]"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

The site is not located within a Zone II, an Interim Wellhead Protection Area, an Aquifer Protection District or Zone, a Potentially Productive Aquifer, or the Zone A of a Class A surface water body used as a public water source. No private wells are located within 500 feet of the site and the area is connected to a municipal water supply. Therefore, drinking water standards do not apply. MADEP Method 1 GW-2 standards (which are protective of volatilization of contaminants from groundwater into indoor air) and GW-3 standards (protective of groundwater discharge to surface water) are used as appropriately protective levels for this EI. GW-2 standards apply to groundwater located within 30 feet of an existing occupied building, and the average annual depth to groundwater in that area is 15 feet or less.

Prior to installation of the groundwater pump and treat and SVE system, a VOC contaminant plume extended from the former UST source area south of the on-site building to at least the northeast corner of the property. In 1993, CHN constructed a remediation system to remediate

soils and groundwater in the area of the former UST. The system consisted of a groundwater extraction system (started up in August 1993) to provide hydraulic control of the migration of COCs and to lower the water table in the source area, combined with a Soil Vapor Extraction system (SVE), which started up in January 1994. The systems were shut down in June 1996. Groundwater sampling conducted since the remediation system began operating resulted in the detection of lower concentrations of VOCs in groundwater.

Attached to this EI are a table and figures submitted as part of the September 2002 data package. Table 1 summarizes the July 2002 and historical groundwater sampling, and figures 2, 3, and 4 show the shallow, intermediate, and deep overburden groundwater contours.

The most recent groundwater sampling data show that all shallow wells (screened from approximately 5 to 17 feet bgs) both on and off-site are below GW-2 and GW-3 standards. Analysis of groundwater samples from some on-site and off-site intermediate wells (screened in the silt/clay layer between approximately 18 and 23 feet) and deep overburden wells (screened in the coarse sand layer between approximately 31 to 45 feet) has detected slight exceedences of GW-2 standards for vinyl chloride (highest detection was 7 ppb, GW-2 standard is 2 ppb) and 1,1-DCE (highest detection was 2 ppb, GW-2 standard is 1 ppb). GW-3 standards have not been exceeded in any wells on or off-site.

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"[2] as defined by the monitoring locations designated at the time of this determination)?

__X_ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"[2]).

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"[2]) - skip to #8 and enter "NO" status code, after providing an explanation.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

The most recent groundwater sampling data show that all shallow wells (screened from approximately 5 to 17 feet) both on and off-site are below GW-2 and GW-3 standards. Figure 2 shows shallow overburden contours indicating that on-site shallow groundwater generally flows northeast, toward the sewer line under Mercer Road. The contours across Mercer Road to the north indicate that groundwater immediately north of the site flows to the southeast, toward the sewer line. The contours show that the sewer line, which fully penetrates the upper aquifer, acts

as a local shallow groundwater sink. Groundwater in the upper aquifer therefore does not migrate beyond the sewer line. Sampling of wells screened within the sewer line backfill did not detect contamination above GW-2 levels.

Analysis of groundwater samples from on and off-site intermediate wells (screened in the silt/clay layer which is found between approximately 18 and 23 feet) and deep overburden wells (screened in the coarse sand layer between approximately 31 to 45 feet) has detected slight exceedences of GW-2 standards for vinyl chloride (highest detection was 7 ppb, GW-2 standard is 2 ppb) and 1,1-DCE (highest detection was 2 ppb, GW-2 standard is 1 ppb). However, GW-2 standards apply only to groundwater located within 30 feet of an existing occupied building **and** the average annual depth to groundwater in that area is 15 feet or less. Since the only exceedences of GW-2 standards were from screened intervals below 18 feet, the GW-2 standards do not strictly apply. GW-3 standards have not been exceeded in any wells on or off-site.

Figure 3 shows intermediate overburden groundwater contours indicating that groundwater flow in the intermediate overburden is to the northeast. Analysis of a sample from OW-11, located on the eastern side of the building, detected 2 ppb of 1,1-DCE. A groundwater sample from GEO-2i, located in Mercer Road approximately 125 feet directly downgradient of OW-11, did not contain VOCs above GW-2 standards. Samples from wells OW-13 and OW-12 (on-site downgradient wells located next to Mercer Road) had concentrations of vinyl chloride of 7 ppb and 4 ppb respectively. Analysis of a sample from well Geo-1i (located off-site, approximately 80 feet directly downgradient of OW-13) detected 3 ppb of vinyl chloride. Although this is slightly above the vinyl chloride GW-2 standard of 2 ppb, the GW-2 standard is not applicable at this well. The shallow well at the same location (GEO-1s) had VOCs below GW-2 standards. Based on this information, it appears that on-site VOC contaminants in the intermediate overburden groundwater slightly above GW-2 standards are attenuating off-site.

Figure 4 shows deep overburden contours which indicate that groundwater flow is to the northeast and north. The groundwater data show concentrations of vinyl chloride and 1,1 DCE at or below the GW-2 standards.

[2] "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

_____ If yes - continue after identifying potentially affected surface water bodies.

__X__ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

The only surface water body near the site is the drainage swale located approximately 180 feet north of the site. However, the swale is located north of the sewer backfill, and is not downgradient of on-site wells screened in the upper aquifer. In addition, "contaminated" groundwater (above GW-2 standards) was not detected in off-site shallow wells, including a shallow well near the swale (OW-30s). It is unlikely that groundwater in the intermediate or deep overburden zone discharges to the swale. In any case, groundwater concentrations from the intermediate and deep zones are in most cases at or below GW-2 standards (the only exceedence of a GW-2 standard was 3 ppb of vinyl chloride detected in intermediate well GEO-1i). All recent groundwater data from on and off-site are below GW-3 standards

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentration[3] of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration[3] of <u>key</u> contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration[3] of <u>each</u> contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations[3] greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence

that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

[3] As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented[4])?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR
2) providing or referencing an interim-assessment,[5] appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):

[4] Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

[5] The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

_**YE**_ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

_____ If no - enter "NO" status code in #8.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

CHN is required under the 1986 Corrective Action Permit to conduct an investigation and corrective measures as necessary. At the time of this Environmental Indicator Evaluation, CHN is evaluating data from the recently completed field season and preparing an RFI report. It is unclear at this time whether additional data collection will be needed to complete the RFI and/or CMS. However, it is likely that additional groundwater information will be required in the future for one or more of the following reasons: complete the RFI; complete a CMS; and/or groundwater monitoring as part of a final remedy.

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

_YE_ YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the

"Migration of Contaminated Groundwater" is "Under Control" at the Clean Harbors of Natick facility , EPA ID # **MAD980523203**, located at 10 Mercer Road in Natick, MA. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

_____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

_____ IN - More information is needed to make a determination.

Completed by (signature) Robert W. Brackett Date _____
(print) Robert W. Brackett
(title) RCRA Facility Manager

Supervisor (signature) Matthew R. Hoagland Date 9/25/02
(print) Matthew R. Hoagland
(title) Chief, RCRA Corrective Action Section
(EPA Region or State) EPA New England

References may be found in the site file located in the records center at 1 Congress Street. Contact telephone and e-mail numbers

(name) Robert W. Brackett
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TABLE 1
HISTORICAL GROUND WATER ANALYTICAL RESULTS
CLEAN HARBORS OF NATICK, INC.
10 MERCER ROAD
NATICK, MASSACHUSETTS

VOCs (USEPA 8260B)	MCP METHOD 1 STANDARDS			Well I.D. Numbers																								
				11/09/00	02/24/97	02/29/96	01/26/95	7/22/02	11/09/00	02/24/97	02/29/96	01/26/95	11/09/00	02/24/97	02/29/96	01/26/95	11/07/00	02/24/97	11/07/00	02/24/97	11/10/00	02/24/97	11/10/00	02/24/97	07/26/02	11/10/00	02/24/97
	GW-1[2]	GW-2	GW-3	PW-1				PW-2					PW-3				CH1-1		CH1-2		CH1-3		CH1-4		CH1-5		
Acetone*	3,000	50,000	50,000	ND (4.7)[3]	ND (20)	ND(500)	ND (20)	ND (1)	ND (4.7)	ND (20)	ND (20)	140	ND (4.7)	ND (20)	ND (20)	ND (20)	ND (4.7)	ND (20)	ND (4.7)	ND (20)	ND (4.7)	ND (20)	5	ND (20)	6	ND (4.7)[3]	ND (20)
Benzene*	5	2,000	7,000	ND (0.5)	ND (5)	ND(130)	ND (5)	ND (0.04)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.5)	ND (5)	ND (0.5)	ND (5)	ND (0.5)	ND (5)	ND (0.5)	ND (5)	ND (0.04)	ND (0.5)	ND (5)
Chloroform*	5	400	10,000	ND (0.3)	ND (5)	1,900	ND (5)	ND (0.03)	ND (0.3)	ND (5)	17	ND (5)	ND (0.3)	ND (5)	5	ND (5)	ND (0.3)	ND (5)	ND (0.3)	ND (5)	ND (0.3)	ND (5)	ND (0.3)	ND (5)	ND (0.03)	ND (0.3)	ND (5)
1,1-Dichloroethane	70	9,000	50,000	ND (1.1)	ND (5)	ND(130)	ND (5)	ND (0.04)	ND (1.1)	ND (5)	ND (5)	ND (5)	ND (1.1)	ND (5)	ND (5)	ND (5)	ND (1.1)	ND (5)	ND (1.1)	ND (5)	ND (1.1)	ND (5)	ND (1.1)	ND (5)	ND (0.04)	ND (1.1)	ND (5)
1,2-Dichloroethane	5	20	50,000	ND (0.3)	ND(5)	ND(130)	ND(5)	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.3)	ND(5)	ND (0.3)	ND(5)	ND (0.3)	ND(5)	ND (0.3)	ND(5)	ND (0.04)	ND (0.3)	ND(5)
1,1-Dichloroethene	7	1	50,000	ND (0.7)	ND(5)	ND(130)	ND(5)	ND (0.2)	ND (0.7)	ND(5)	ND(5)	ND(5)	ND (0.7)	ND(5)	ND(5)	ND(5)	ND (0.7)	ND(5)	ND (0.7)	ND(5)	ND (0.7)	ND(5)	ND (0.7)	ND(5)	ND (0.2)	ND (0.7)	ND(5)
cis-1,2-Dichloroethene	70	30,000	50,000	2				ND (0.02)	ND (0.4)				2				ND (0.4)		ND (0.4)		ND (0.4)		ND (0.4)		ND (0.02)	ND (0.4)	
trans-1,2-Dichloroethene*	100	20,000	50,000	ND (0.4)	ND (5)	ND(130)	ND (5)	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (0.4)	ND (5)	ND (0.4)	ND (5)	ND (0.4)	ND (5)	ND (0.2)	ND (0.4)	ND (5)
Ethylbenzene*	700	30,000	4,000	ND (0.4)	ND (5)	ND(130)	6	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (0.4)	ND (5)	ND (0.4)	ND (5)	ND (0.4)	ND (5)	ND (0.1)	ND (0.4)	ND (5)
4-Methyl-2-pentanone	*160*			ND (1.9)	ND (5)	ND(130)	ND (5)	ND (0.1)	ND (1.9)	ND (5)	ND (5)	320	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (1.9)	ND (5)	ND (1.9)	ND (5)	ND (1.9)	ND (5)	ND (1.9)	ND (5)	4	ND (1.9)	ND (5)
2-Hexanone	*NA*			ND (1.6)	ND(5)	ND(130)	ND(5)	ND (0.1)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (1.6)	ND(5)	ND (1.6)	ND(5)	ND (1.6)	ND(5)	ND (1.6)	ND(5)	ND (0.1)	ND (1.6)	ND(5)
2-Butanone (MEK)	350	50,000	50,000	2	ND(20)	ND(500)	ND(20)	ND (0.3)	ND (2.7)	ND(20)	ND(20)	ND(20)	ND (2.7)	ND(20)	ND(20)	ND(20)	ND (2.7)	ND(20)	ND (2.7)	ND(20)	ND (2.7)	ND(20)	2	ND(20)	1 J	2	ND(20)
Methyl-t-butyl ether (MTBE)	70	50,000	50,000	NA	ND (10)	ND(250)	ND (10)	NA	NA	ND (10)	ND (10)	ND (10)	NA	ND (10)	ND (10)	ND (10)	NA	ND (10)	NA	ND (10)	NA	ND (10)	NA	17	NA	NA	ND (10)
Tetrachloroethene	5	3,000	5,000	ND (0.4)	ND (5)	ND(130)	ND (5)	0.5 J	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (0.4)	ND (5)	ND (0.4)	ND (5)	ND (0.4)	ND (5)	ND (0.1)	ND (0.4)	ND (5)
Toluene*	1,000	6,000	50,000	ND (0.3)	ND (5)	ND(130)	ND (5)	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.3)	ND (5)	ND (0.3)	ND (5)	ND (0.3)	ND (5)	ND (0.3)	ND (5)	0.4 J	ND (0.3)	ND (5)
Trichloroethene*	5	300	20,000	ND (0.5)	ND (5)	ND(130)	ND (5)	0.1 J	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.5)	ND (5)	ND (5)	6	ND (0.5)	ND (5)	ND (0.5)	ND (5)	ND (0.5)	ND (5)	ND (0.5)	ND (5)	ND (0.1)	ND (0.5)	ND (5)
Vinyl chloride*	2	2	40,000	ND (0.5)	ND (10)	ND(250)	ND (10)	ND (0.1)	ND (0.5)	ND (10)	ND (10)	ND (10)	ND (0.5)	ND (10)	ND (10)	ND (10)	ND (0.5)	ND (10)	ND (0.5)	ND (10)	ND (0.5)	ND (10)	ND (0.5)	ND (10)	ND (0.1)	ND (0.5)	ND (10)
Total xylenes	10,000	6,000	50,000	ND (0.6)	ND (5)	ND(130)	ND (5)	ND (0.1)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (0.6)	ND (5)	ND (0.6)	ND (5)	ND (0.6)	ND (5)	ND (0.6)	ND (5)	ND (0.1)	ND (0.6)	ND (5)
Methylene chloride	5	50,000	50,000	ND (2.3)	ND(20)	ND(500)	ND(20)	ND (0.3)[4]	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (2.3)	ND(20)	ND (2.3)	ND(20)	ND (2.3)	ND(20)	ND (2.3)	ND(20)	ND (0.3)	ND (2.3)	ND(20)
Chloromethane	*1.5*			ND (2.2)	ND(10)	ND(250)	ND(10)	ND (0.2)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (2.2)	ND(10)	ND (2.2)	ND(10)	ND (2.2)	ND(10)	ND (2.2)	ND(10)	ND (0.2)	ND (2.2)	ND(10)
Carbon disulfide	*1,000*			ND (0.7)	ND(10)	ND(250)	ND(10)	ND (0.3)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.7)	ND(10)	ND (0.7)	ND(10)	ND (0.7)	ND(10)	ND (0.7)	ND(10)	ND (0.3)	ND (0.7)	ND(10)
1,2-Dichlorobenzene	600	10,000	8,000					NA																	NA		
1,4-Dichlorobenzene	5	30,000	8,000					NA																	NA		
Bromodichloromethane	5	NA	50,000					ND (0.04)																	ND (0.04)		
Bromoform	5	800	50,000					ND (0.1)																	ND (0.1)		
Chlorobenzene	100	1,000	500					ND (0.03)																	ND (0.03)		
Dibromochloromethane	5		50,000					ND (0.1)																	ND (0.1)		
Naphthalene	20	6,000	6,000					NA																	NA		
trans-1,3-Dichloropropene	---							ND (0.1)																	ND (0.1)		

NOTES:

1 Reported concentrations are in micrograms per liter (ug/l) or ppb
2 USEPA Preliminary Remedial Goals (PRGs) for tap water are shown in italics where Method 1 Standards do not exist
3 Value was altered based upon results of Level 2 Data Validation
4 Methylene chloride was also detected in the trip blank
5 "J" Represents estimated value below the method detection limit
6 * Constituent of Concern
7 MCP = Massachusetts Contingency Plan
8 --- = Method 1 Standards or PRGs do not exist
9 ND(x) = Parameter not detected above method detection limit noted in parentheses
10 NA = Compound not analyzed
11 Blank = Compound not analyzed or compound not detected

TABLE 1
HISTORICAL GROUND WATER ANALYTICAL RESULTS
CLEAN HARBORS OF NATICK, INC.
10 MERCER ROAD
NATICK, MASSACHUSETTS

VOCs (USEPA 8260B)	MCP METHOD 1 STANDARDS			Well I.D. Numbers																								
				7/22/02	11/09/00	02/24/97	02/29/96	01/20/95	7/22/02	11/07/00	02/24/97	02/29/96	01/20/95	11/08/00	02/24/97	02/29/96	01/20/95	7/23/02	11/07/00	02/24/97	02/29/96	01/20/95	11/08/00	02/24/97	02/29/96	01/20/95
	GW-1[1]	GW-2	GW-3	OW-1					OW-2					OW-3				OW-4					OW-5						
Acetone*	3,000	50,000	50,000	2 J	ND (4.7)	ND (20)	ND (20)	ND (20)	ND (1)	ND (4.7)	ND (20)	ND (20)	ND (20)	ND (4.7)	ND (20)	ND (20)	ND (20)	2 J	ND (4.7)	ND (20)	ND (20)	ND (20)	ND (4.7)	ND (20)	ND (20)	ND (20)
Benzene*	5	2,000	7,000	ND (0.04)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.04)	1	ND (5)	22	ND (5)	ND (0.5)	ND (5)	ND (5)	ND (5)
Chloroform*	5	400	10,000	ND (0.03)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.03)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.03)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.3)	ND (5)	ND (5)	ND (5)
1,1-Dichloroethane	70	9,000	50,000	ND (0.04)	ND (1.1)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (1.1)	ND (5)	ND (5)	ND (5)	ND (1.1)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (1.1)	ND (5)	ND (5)	ND (5)	ND (1.1)	ND (5)	ND (5)	ND (5)
1,2-Dichloroethane	5	20	50,000	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.3)	ND(5)	ND(5)	ND(5)
1,1-Dichloroethene	7	1	50,000	ND (0.2)	ND (0.7)	ND(5)	ND(5)	ND(5)	ND (0.2)	ND (0.7)	ND(5)	ND(5)	ND(5)	ND (0.7)	ND(5)	ND(5)	ND(5)	ND (0.2)	ND (0.7)		ND(5)	ND(5)	ND (0.7)	ND(5)	ND(5)	ND(5)
cis-1,2-Dichloroethene	70	30,000	50,000	ND (0.02)	ND (0.4)				ND (0.02)	ND (0.4)				ND (0.4)				0.2 J	ND (0.4)				ND (0.4)			
trans-1,2-Dichloroethene*	100	20,000	50,000	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)
Ethylbenzene*	700	30,000	4,000	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)
4-Methyl-2-pentanone	*160*			ND (0.1)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (1.9)	ND (5)	ND (5)	ND (5)
2-Hexanone	*NA*			ND (0.1)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (0.1)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (0.1)	ND (1.6)		ND(5)	ND(5)	ND (1.6)	ND(5)	ND(5)	ND(5)
2-Butanone (MEK)	350	50,000	50,000	ND (0.3)	2	ND(20)	ND(20)	ND(20)	ND (0.3)	ND (2.7)	ND(20)	ND(20)	ND(20)	ND (2.7)	ND(20)	ND(20)	ND(20)	ND (0.3)	ND (2.7)		ND(20)	ND(20)	ND (2.7)	ND(20)	ND(20)	ND(20)
Methyl-t-butyl ether (MTBE)	70	50,000	50,000	NA	NA	ND (10)	ND (10)	ND (10)	NA	NA	ND (10)	ND (10)	ND (10)	NA	ND (10)	ND (10)	ND (10)	NA	NA	ND (10)	ND (10)	ND (10)	NA	ND (10)	ND (10)	ND (10)
Tetrachloroethene	5	3,000	5,000	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)
Toluene*	1,000	6,000	50,000	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.3)	ND (5)	ND (5)	ND (5)
Trichloroethene*	5	300	20,000	ND (0.1)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)
Vinyl chloride*	2	2 [5]	40,000	ND (0.1)	ND (0.5)	ND (10)	ND (10)	ND (10)	ND (0.1)	ND (0.5)	ND (10)	ND (10)	ND (10)	ND (0.5)	ND (10)	ND (10)	ND (10)	0.4 J	0.6	ND (5)	ND (5)	ND (5)	ND (0.5)	ND (5)	ND (5)	ND (5)
Total xylenes	10,000	6,000	50,000	ND (0.1)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (0.1)	0.9	ND (10)	ND (10)	ND (10)	ND (0.5)	ND (10)	ND (10)	ND (10)
Methylene chloride	5	50,000	50,000	ND (0.3)[4]	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (0.3)[4]	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (0.3)	ND (2.3)		ND(20)	ND(20)	ND (2.3)	ND(20)	ND(20)	ND(20)
Chloromethane	*1.5*			ND (0.2)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (0.2)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (0.2)	ND (2.2)		ND(10)	ND(10)	ND (2.2)	ND(10)	ND(10)	ND(10)
Carbon disulfide	*1,000*			ND (0.3)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.3)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.3)	ND (0.7)		ND(10)	ND(10)	ND (0.7)	ND(10)	ND(10)	ND(10)
1,2-Dichlorobenzene	600	10,000	8,000	ND (0.04)					ND (0.04)									NA								
1,4-Dichlorobenzene	5	30,000	8,000	ND (0.02)					ND (0.02)									NA								
Bromodichloromethane	5	NA	50,000	ND (0.04)					ND (0.04)									ND (0.04)								
Bromoform	5	800	50,000	ND (0.1)					ND (0.1)									ND (0.1)								
Chlorobenzene	100	1,000	500	ND (0.03)					ND (0.03)									ND (0.03)								
Dibromochloromethane	5		50,000	ND (0.1)					ND (0.1)									ND (0.1)								
Naphthalene	20	6,000	6,000	ND (0.4)					ND (0.4)									NA								
trans-1,3-Dichloropropene	---			ND (0.1)					ND (0.1)									ND (0.1)								

NOTES:

1. Reported concentrations are in micrograms per liter (ug/l) or ppb
2. USEPA Preliminary Remedial Goals (PRGs) for tap water are shown in italics where Method 1 Standards do not exist
3. Value was altered based upon results of Level 2 Data Validation
4. Methylene chloride was also detected in the trip blank.
5. "J" Represents estimated value below the method detection limit.
6. * Constituent of Concern
7. MCP = Massachusetts Contingency Plan
8. --- = Method 1 Standards or PRGs do not exist
9. ND(x) = Parameter not detected above method detection limit noted in parentheses
10. NA = Compound not analyzed
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CLEAN HARBORS OF NATICK, INC.
10 MERCER ROAD
NATICK, MASSACHUSETTS

VOCs (USEPA 8260B)	MCP METHOD 1 STANDARDS			Well I.D. Numbers																									
				7/23/02	11/08/00	02/24/97	02/29/96	01/20/95	02/24/97	11/08/00	02/24/97	02/29/96	01/20/95	7/24/02	11/08/00	02/24/97	02/29/96	01/20/95	11/08/00	02/24/97	02/29/96	01/20/95	7/24/02	11/07/00	02/24/97	02/29/96	01/20/95
	GW-1[2]	GW-2	GW-3	OW-6					OW-6 (DUP)	OW-8				OW-9					OW-10				OW-11					
Acetone*	3,000	50,000	50,000	2 J	ND (4.7)	ND (20)	ND (20)	ND (20)	ND (20)	ND (4.7)	ND (20)	ND (20)	ND (20)	ND (1)	ND (4.7)	ND (20)	ND (20)	ND (20)	ND (4.7)	ND (20)	ND (20)	ND (20)	ND (1)	ND (4.7)	ND (20)	ND (20)	ND (20)
Benzene*	5	2,000	7,000	1	2	ND (5)	ND (5)	ND (5)	ND (5)	ND (0.5)	ND (5)	ND(5)	ND(10)	ND (0.04)	ND (0.5)	ND (5)	ND(5)	ND (10)	ND (0.5)	ND (5)	ND(5)	ND (10)	ND (0.04)	ND (0.5)	ND (5)	ND(5)	ND (10)
Chloroform*	5	400	10,000	ND (0.03)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (5)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.03)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.03)	ND (0.3)	ND (5)	ND (5)	ND (5)
1,1-Dichloroethane	70	9,000	50,000	ND (0.04)	ND (1.1)	ND (5)	ND (5)	ND (5)	ND (5)	ND (1.1)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (1.1)	ND (5)	ND (5)	9	ND (1.1)	ND (5)	ND (5)	ND (5)	12	13	14	9	ND (5)
1,2-Dichloroethane	5	20	50,000	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND(5)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)
1,1-Dichloroethene	7	1	50,000	ND (0.2)	ND (0.7)	ND(5)	ND(5)	ND(5)	ND(5)	ND (0.7)	ND(5)	ND(5)	ND(5)	ND (0.2)	ND (0.7)	ND(5)	ND(5)	ND(5)	ND (0.7)	ND(5)	ND(5)	ND(5)	2	2	ND(5)	ND(5)	ND(5)
cis-1,2-Dichloroethene	70	30,000	50,000	0.2 J	ND (0.4)					ND (0.4)				0.1 J	ND (0.4)				ND (0.4)				0.2 J	ND (0.4)	-		
trans-1,2-Dichloroethene*	100	20,000	50,000	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)
Ethylbenzene*	700	30,000	4,000	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND(5)	ND (0.1)	ND (0.4)	ND (5)	ND(5)	ND(5)	ND (0.4)	ND (5)	ND(5)	ND(5)	ND (0.1)	ND (0.4)	ND (5)	ND(5)	ND(5)
4-Methyl-2-pentanone	*160*			ND (0.1)	ND (1.9)[3]	ND (5)	ND (5)	ND (5)	ND (5)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (1.9)	ND (5)	ND (5)	ND (5)
2-Hexanone	*NA*			ND (0.1)	ND (1.6)[3]	ND(5)	ND(5)	ND(5)	ND(5)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (0.1)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (0.1)	ND (1.6)	ND(5)	ND(5)	ND(5)
2-Butanone (MEK)	350	50,000	50,000	ND (0.3)	ND (2.7)	ND(20)	ND(20)	ND(20)	ND(20)	ND (2.7)	ND(20)	ND(20)	ND(20)	ND (0.3)	ND (2.7)	ND(20)	ND(20)	ND(20)	2	ND(20)	ND(20)	ND(20)	ND (0.3)	ND (2.7)	ND(20)	ND(20)	ND(20)
Methyl-t-butyl ether (MTBE)	70	50,000	50,000	NA	NA	ND (10)	ND (10)	ND (10)	ND (10)	NA	ND (10)	ND(10)	ND(10)	NA	NA	ND (10)	ND(10)	ND(10)	NA	ND (10)	ND(10)	ND(10)	NA	NA	ND (10)	ND(10)	ND(10)
Tetrachloroethene	5	3,000	5,000	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)	0.9	4	11	ND (5)	ND (5)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)
Toluene*	1,000	6,000	50,000	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (5)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)
Trichloroethene*	5	300	20,000	ND (0.1)	1	ND (5)	ND (5)	ND (5)	ND (5)	ND (0.5)	ND (5)	ND(5)	ND(5)	0.4 J	0.6	ND (5)	ND(5)	ND(5)	ND (0.5)	ND (5)	ND(5)	ND(5)	1	0.9	ND (5)	ND(5)	ND(5)
Vinyl chloride*	2	2	40,000	ND (0.1)	ND (0.5)	ND (10)	ND (10)	ND (10)	ND (10)	ND (0.5)	ND (10)	ND (10)	ND (10)	ND (0.1)	ND (0.5)	ND (10)	ND (10)	ND (10)	ND (0.5)	ND (10)	ND (10)	ND (10)	2	2	ND (10)	ND (10)	ND (10)
Total xylenes	10,000	6,000	50,000	ND (0.1)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (5)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.6)	ND (5)	ND (5)	ND (5)
Methylene chloride	5	50,000	50,000	ND (0.3)	0.7[4]	ND(20)	ND(20)	ND(20)	ND(20)	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (0.3)[4]	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (0.3)[4]	ND (2.3)	ND(20)	ND(20)	ND(20)
Chloromethane	*1.5*			ND (0.2)	0.7	ND(10)	ND(10)	ND(10)	ND(10)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (0.2)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (0.2)	ND (2.2)	ND(10)	ND(10)	ND(10)
Carbon disulfide	*1,000*			ND (0.3)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND(10)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.3)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.3)	ND (0.7)	ND(10)	ND(10)	ND(10)
1,2-Dichlorobenzene	600	10,000	8,000	NA										NA									NA				
1,4-Dichlorobenzene	5	30,000	8,000	NA										NA									NA				
Bromodichloromethane	5	NA	50,000	ND (0.04)										ND (0.04)									ND (0.04)				
Bromoform	5	800	50,000	ND (0.1)										ND (0.1)									ND (0.1)				
Chlorobenzene	100	1,000	500	ND (0.03)										ND (0.03)									ND (0.03)				
Dibromochloromethane	5		50,000	ND (0.1)										ND (0.1)									ND (0.1)				
Naphthalene	20	6,000	6,000	NA										NA									NA				
trans-1,3-Dichloropropene	---			ND (0.1)										ND (0.1)									ND (0.1)				

NOTES:

1 Reported concentrations are in micrograms per liter (ug/l) or ppb.
2 USEPA Preliminary Remedial Goals (PRGs) for tap water are shown in italics where Method 1 Standards do not exist
3 Value was altered based upon results of Level 2 Data Validation
4 Methylene chloride was also detected in the trip blank.
5 "J" Represents estimated value below the method detection limit
6 * Constituent of Concern
7 MCP = Massachusetts Contingency Plan
8 --- = Method 1 Standards or PRGs do not exist.
9 ND(x) = Parameter not detected above method detection limit noted in parentheses.
10 NA = Compound not analyzed
11 Blank = Compound not analyzed or compound not detected

TABLE 1
HISTORICAL GROUND WATER ANALYTICAL RESULTS
CLEAN HARBORS OF NATICK, INC.
10 MERCER ROAD
NATICK, MASSACHUSETTS

VOCs (USEPA 8260B)	MCP METHOD 1 STANDARDS			Well I.D. Numbers																						
	GW-1[2]	GW-2	GW-3	7/25/02	11/07/00	02/24/97	02/29/96	01/20/95	7/25/02	11/08/00	02/24/97	02/29/96	01/20/95	7/25/02	02/24/97	7/24/02	11/07/00	02/24/97	02/29/96	01/20/95	7/24/02	7/23/02	11/08/00	02/24/97	02/29/96	01/20/95
				OW-12					OW-13					OW-13(DUP)		OW-14					OW-14(DUP)	OW-15				
Acetone*	3,000	50,000	50,000	ND (2)	ND (4.7)	ND (20)	ND (20)	ND (20)	ND (5)	ND (4.7)	ND (20)	ND(100)	ND (20)	31	ND (20)	2 J	ND (4.7)	ND (20)	ND (20)	ND (20)	1 J	ND (1)	ND (4.7)	ND (20)	ND (20)	ND (20)
Benzene*	5	2,000	7,000	36	28	38	66	5	5	6	20	ND(25)	11	5	20	ND (0.04)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (0.04)	ND (0.5)	ND (5)	ND (5)	ND (5)
Chloroform*	5	400	10,000	ND (0.06)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.2)	ND (0.3)	ND (5)	ND(25)	ND (5)	ND (0.2)	ND (5)	ND (0.03)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.03)	ND (0.03)	ND (0.3)	ND (5)	ND (5)	ND (5)
1,1-Dichloroethane	70	9,000	50,000	13	14	11	6	9	2 J	2	7	ND(25)	6	2 J	7	11	10	17	11	11	11	2	3	ND (5)	ND (5)	ND(5)
1,2-Dichloroethane	5	20	50,000	2	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.2)	ND (0.3)	ND(5)	ND(25)	ND(5)	ND (0.2)	ND(5)	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.04)	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)
1,1-Dichloroethene	7	1	50,000	1	1	ND(5)	ND(5)	ND(5)	ND (1)	ND (0.7)	ND(5)	ND(25)	ND(5)	ND (1)	ND(5)	1	2	ND(5)	ND(5)	ND(5)	2	0.5	0.7	ND(5)	ND(5)	ND(5)
cis-1,2-Dichloroethene	70	30,000	50,000	0.5 J	0.5				90	90				87		0.3 J	ND (0.4)				0.3 J	0.1 J	ND (0.4)			
trans-1,2-Dichloroethene*	100	20,000	50,000	ND (0.4)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (1)	ND (0.4)	490	680	500	ND (1)	460	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.2)	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)
Ethylbenzene*	700	30,000	4,000	2	0.7	ND (5)	ND(5)	ND (5)	13	40	130	170	110	12	130	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)
4-Methyl-2-pentanone	*160*			ND (0.2)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (0.5)	ND (1.9)	ND (5)	ND(25)	ND (5)	ND (0.5)	ND (5)	ND (0.1)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.1)	ND (1.9)	ND (5)	ND (5)	ND (5)
2-Hexanone	*NA*			ND (0.2)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (0.5)	ND (1.6)[3]	ND(5)	ND(25)	ND(5)	ND (0.5)	ND(5)	ND (0.1)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (0.1)	ND (0.1)	ND (1.6)	ND(5)	ND(5)	ND(5)
2-Butanone (MEK)	350	50,000	50,000	ND (0.6)	ND (2.7)	ND(20)	ND(20)	ND(20)	ND (2)	2	ND(20)	ND(100)	ND(20)	ND (2)	ND(20)	ND (0.3)	ND (2.7)	ND(20)	ND(20)	ND(20)	ND (0.3)	ND (0.3)	ND (2.7)	ND(20)	ND(20)	ND(20)
Methyl-t-butyl ether(MTBE)	70	50,000	50,000	NA	NA	ND (10)	ND(10)	ND (10)	NA	NA	ND (10)	ND(50)	ND (10)	NA	ND (10)	NA	NA	ND (10)	ND (10)	ND (10)	NA	NA	NA	ND (10)	ND (10)	ND (10)
Tetrachloroethene	5	3,000	5,000	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.5)	ND (0.4)	ND (5)	ND(25)	ND (5)	1 J	ND (5)	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)
Toluene*	1,000	6,000	50,000	ND (0.08)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.2)	1	9	390	180	0.6 J	10	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)
Trichloroethene*	5	300	20,000	0.5 J	0.5	ND (5)	ND(5)	ND (5)	0.8 J	0.6	ND (5)	ND(25)	ND (5)	0.9 J	ND (5)	1	1	ND (5)	ND (5)	ND (5)	1	0.2 J	ND (0.5)	ND (5)	ND (5)	ND (5)
Vinyl chloride*	2	2	40,000	4	4	10	ND (10)	ND (10)	7	7	51	ND(50)	ND (10)	7	47	2	2	ND (10)	ND (10)	ND (10)	2	0.3 J	ND (0.5)	ND (10)	ND (10)	ND (10)
Total xylenes	10,000	6,000	50,000	4	0.8	ND (5)	ND (5)	ND (5)	7	19	110	300	190	6	96	ND (0.1)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.1)	ND (0.6)	ND (5)	ND (5)	ND (5)
Methylene chloride	5	50,000	50,000	ND (0.6)	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (2)	0.5[4]	ND(20)	ND(100)	ND(20)	ND (2)	ND(20)	ND (0.3)	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (0.3)[4]	ND (0.3)	0.5[4]	ND(20)	ND(20)	ND(20)
Chloromethane	*1.5*			ND (0.4)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (1)	ND (2.2)	ND(10)	ND(50)	ND(10)	ND (1)	ND(10)	ND (0.2)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (0.2)	ND (0.2)	ND (2.2)	ND(10)	ND(10)	ND(10)
Carbon disulfide	*1,000*			ND (0.6)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (2)	ND (0.7)	ND(10)	ND(50)	ND(10)	ND (2)	ND(10)	ND (0.3)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.3)	ND (0.3)	ND (0.7)	ND(10)	ND(10)	ND(10)
1,2-Dichlorobenzene	600	10,000	8,000	NA					NA					NA		NA					NA	NA				
1,4-Dichlorobenzene	5	30,000	8,000	NA					NA					NA		NA					NA	NA				
Bromodichloromethane	5	NA	50,000	ND (0.08)					ND (0.2)					ND (0.2)		ND (0.04)					ND (0.04)	ND (0.04)				
Bromoform	5	800	50,000	ND (0.2)					ND (0.5)					ND (0.5)		ND (0.1)					ND (0.1)	ND (0.1)				
Chlorobenzene	100	1,000	500	ND (0.06)					ND (0.2)					ND (0.2)		ND (0.03)					ND (0.03)	ND (0.03)				
Dibromochloromethane	5		50,000	ND (0.2)					ND (0.5)					ND (0.5)		ND (0.1)					ND (0.1)	ND (0.1)				
Naphthalene	20	6,000	6,000	NA					NA					NA		NA					NA	NA				
trans-1,3-Dichloropropene	---			ND (0.2)					ND (0.5)					0.5		ND (0.1)					ND (0.1)	ND (0.1)				

NOTES:

1. Reported concentrations are in micrograms per liter (ug/l) or ppb
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3. Value was altered based upon results of Level 2 Data Validation
4. Methylene chloride was also detected in the trip blank.
5. "J" Represents estimated value below the method detection limit
6. * Constituent of Concern.
7. MCP = Massachusetts Contingency Plan
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CLEAN HARBORS OF NATICK, INC.
10 MERCER ROAD
NATICK, MASSACHUSETTS

VOCs (USEPA 8260B)	MCP METHOD 1 STANDARDS			Well I.D. Numbers																											
	GW-1[2]	GW-2	GW-3	7/23/02	11/09/00	02/24/97	02/29/96	01/20/95	7/23/02	7/23/02	11/09/00	02/24/97	02/29/96	01/20/95	7/24/02	11/06/00	7/24/02	11/06/00	7/23/02	11/06/00	7/24/02	7/23/02	11/10/00	7/24/02	11/07/00	7/23/02	11/08/00
				OW-16S					OW-16S(DUP)	OW-16D					OW-30S		OW-30D		OW-31S		OW-31D	OW-32S		OW-32D	OW-33S	MW-1	
Acetone*	3,000	50,000	50,000	1 J	ND (4.7)	ND (20)	ND (20)	ND (20)	ND (1)	2 J	ND (4.7)	ND (20)	ND (20)	ND (20)	2 J	ND (4.7)	ND (1)	ND (4.7)	3 J	ND (4.7)	2 J	ND (1)	ND (4.7)	1 J	ND (4.7)	2 J	ND (4.7)[3]
Benzene*	5	2,000	7,000	ND (0.04)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (0.04)	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (0.5)	4	3	ND (0.04)	ND (0.5)	0.1 J	ND (0.04)	ND (0.5)	15	ND (0.5)	ND (0.04)	ND (0.5)
Chloroform*	5	400	10,000	ND (0.03)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.03)	ND (0.03)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.03)	ND (0.3)	ND (0.03) J	ND (0.3)	ND (0.03)	ND (0.3)	ND (0.03)	ND (0.03)	ND (0.3)	ND (0.03)	ND (0.3)	ND (0.03)	ND (0.3)
1,1-Dichloroethane	70	9,000	50,000	ND (0.04)	ND (1.1)	ND (5)	ND (5)	ND(5)	ND (0.04)	ND (0.04)	ND (1.1)	ND (5)	ND (5)	ND(5)	ND (0.04)	ND (1.1)	9	10	ND (0.04)	ND (1.1)	1	ND (0.04)	ND (1.1)	7	ND (1.1)	ND (0.04)	ND (1.1)
1,2-Dichloroethane	5	20	50,000	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.04)	ND (0.04)	ND (0.3)	ND(5)	ND(5)	ND(5)	ND (0.04)	ND (0.3)	ND (0.04)	ND (0.3)	ND (0.04)	ND (0.3)	ND (0.04)	ND (0.04)	ND (0.3)	2	ND (0.3)	ND (0.04)	ND (0.3)
1,1-Dichloroethene	7	1	50,000	ND (0.2)	ND (0.7)	ND(5)	ND(5)	ND(5)	ND (0.2)	ND (0.2)	ND (0.7)	ND(5)	ND(5)	ND(5)	ND (0.2)	ND (0.7)	1	1	ND (0.2)	ND (0.7)	0.2 J	ND (0.2)	ND (0.7)	0.5 J	ND (0.7)	ND (0.2)	ND (0.7)
cis-1,2-Dichloroethene	70	30,000	50,000	ND (0.02)	3				ND (0.02)	0.5 J	ND (0.4)				ND (0.02)	ND (0.4)	0.5	ND (0.4)	ND (0.02)	ND (0.4)	10	ND (0.02)	ND (0.4)	0.4 J	ND (0.4)	ND (0.02)	ND (0.4)
trans-1,2-Dichloroethene*	100	20,000	50,000	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.2)	ND (0.2)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.2)	ND (0.4)	ND (0.2)	ND (0.4)	ND (0.2)	ND (0.4)	1	ND (0.2)	ND (0.4)	ND (0.2)	ND (0.4)	ND (0.2)	ND (0.4)
Ethylbenzene*	700	30,000	4,000	ND (0.1)	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.1)	ND (0.4)	ND (5)	ND (5)	7	ND (0.1)	ND (0.4)	ND (0.1)	ND (0.4)	ND (0.1)	ND (0.4)	ND (0.1)	ND (0.1)	ND (0.4)	ND (0.1)	ND (0.4)	ND (0.1)	ND (0.4)
4-Methyl-2-pentanone	*160*			ND (0.1)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.1)	ND (1.9)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (1.9)	ND (0.1)	ND (1.9)	ND (0.1)	ND (1.9)	ND (0.1)	ND (0.1)	ND (1.9)	ND (0.1)	ND (1.9)	ND (0.1)	ND (1.9)
2-Hexanone	*NA*			ND (0.1)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (0.1)	ND (0.1)	ND (1.6)	ND(5)	ND(5)	ND(5)	ND (0.1)	ND (1.6)	ND (0.1)	ND (1.6)	ND (0.1)	ND (1.6)	ND (0.1)	ND (0.1)	ND (1.6)	ND (0.1)	ND (1.6)	ND (0.1)	ND (1.6)
2-Butanone (MEK)	350	50,000	50,000	ND (0.3)	ND (2.7)	ND(20)	ND(20)	ND(20)	ND (0.3)	ND (0.3)	ND (2.7)	ND(20)	ND(20)	ND(20)	ND (0.3)	ND (2.7)	ND (0.3)	ND (2.7)	ND (0.3)	ND (2.7)	ND (0.3)	ND (0.3)	ND (2.7)	ND (0.3)	ND (2.7)	ND (0.3)	ND (2.7)
Methyl-t-butyl ether (MTBE)	70	50,000	50,000	NA	NA	ND (10)	ND (10)	ND (10)	NA	NA	NA	ND (10)	ND (10)	ND (10)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethene	5	3,000	5,000	0.7	ND (0.4)	ND (5)	ND (5)	ND (5)	0.7	0.2 J	ND (0.4)	ND (5)	ND (5)	ND (5)	ND (0.1)	5	ND (0.1)	ND (0.4)	0.3 J	ND (0.4)	2	ND (0.1)	ND (0.4)	ND (0.1)	ND (0.4)	ND (0.1)	ND (0.4)
Toluene*	1,000	6,000	50,000	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)	ND (0.04)	ND (0.04)	ND (0.3)	ND (5)	ND (5)	ND (5)	5	ND (0.3)	ND (0.04)	ND (0.3)	ND (0.04)	ND (0.3)	ND (0.04)	ND (0.04)	ND (0.3)	ND (0.04)	ND (0.3)	ND (0.04)	ND (0.3)
Trichloroethene*	5	300	20,000	0.4 J	ND (0.5)	ND (5)	ND (5)	ND (5)	0.4 J	0.6	ND (0.5)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.5)	0.6	1	ND (0.1)	ND (0.5)	10	ND (0.1)	ND (0.5)	0.3 J	ND (0.5)	ND (0.1)	ND (0.5)
Vinyl chloride*	2	2	40,000	ND (0.1)	ND (0.5)	ND (10)	ND (10)	ND (10)	ND (0.1)	ND (0.1)	ND (0.5)	ND (10)	ND (10)	ND (10)	ND (0.1)	ND (0.5)	2	2	ND (0.1)	ND (0.5)	0.2 J	ND (0.1)	ND (0.5)	2	ND (0.5)	ND (0.1)	ND (0.5)
Total xylenes	10,000	6,000	50,000	ND (0.1)	2	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.1)	ND (0.6)	ND (5)	ND (5)	ND (5)	ND (0.1)	ND (0.6)	ND (0.1)	ND (0.6)	ND (0.1)	ND (0.6)	ND (0.1)	ND (0.1)	ND (0.6)	ND (0.1)	ND (0.6)	ND (0.1)	ND (0.6)
Methylene chloride	5	50,000	50,000	ND (0.3)[4]	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (0.3)[4]	ND (0.3)[4]	ND (2.3)	ND(20)	ND(20)	ND(20)	ND (0.3)[4]	ND (2.3)	ND (0.3)[4]	ND(2.3)[5]	ND (0.3)	ND (2.3)	ND (0.3)[4]	ND (0.3)[4]	ND (2.3)	ND (0.3)	ND (2.3)	ND (0.3)[4]	3
Chloromethane	*1.5*			ND (0.2)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (0.2)	ND (0.2)	ND (2.2)	ND(10)	ND(10)	ND(10)	ND (0.2)	ND (2.2)	ND (0.2)	ND (2.2)	ND (0.2)	ND (2.2)	ND (0.2)	ND (0.2)	ND (2.2)	ND (0.2)	ND (2.2)	ND (0.2)	ND (2.2)
Carbon disulfide	*1,000*			ND (0.3)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.3)	ND (0.3)	ND (0.7)	ND(10)	ND(10)	ND(10)	ND (0.3)	ND (0.7)	ND (0.3)	ND (0.7)	0.4 J	ND (0.7)[3]	ND (0.3)	ND (0.3)	ND (0.7)	ND (0.3)	ND (0.7)	ND (0.3)	ND (0.7)
1,2-Dichlorobenzene	600	10,000	8,000	ND (0.04)					ND (0.04)	4					NA		NA		NA		NA	NA		NA		NA	
1,4-Dichlorobenzene	5	30,000	8,000	ND (0.02)					ND (0.02)	2					NA		NA		NA		NA	NA		NA		NA	
Bromodichloromethane	5	NA	50,000	ND (0.04)					ND (0.04)	ND (0.04)					ND (0.04)		ND (0.04)		ND (0.04)		ND (0.04)	ND (0.04)		ND (0.04)		ND (0.04)	
Bromoform	5	800	50,000	ND (0.1)					ND (0.1)	ND (0.1)					ND (0.1)		ND (0.1)		ND (0.1)		ND (0.1)	ND (0.1)		ND (0.1)		ND (0.1)	
Chlorobenzene	100	1,000	500	ND (0.03)					ND (0.03)	0.5 J					ND (0.03)		ND (0.03)		ND (0.03)		ND (0.03)	ND (0.03)		ND (0.03)		ND (0.03)	
Dibromochloromethane	5		50,000	ND (0.1)					ND (0.1)	ND (0.1)					ND (0.1)		ND (0.1)		ND (0.1)		ND (0.1)	ND (0.1)		ND (0.1)		ND (0.1)	
Naphthalene	20	6,000	6,000	2					ND (0.4)	ND (0.4)					NA		NA		NA		NA	NA		NA		NA	
trans-1,3-Dichloropropene	---			ND (0.1)					ND (0.1)	ND (0.1)					ND (0.1)		ND (0.1)		ND (0.1)		ND (0.1)	ND (0.1)		ND (0.1)		ND (0.1)	

NOTES:

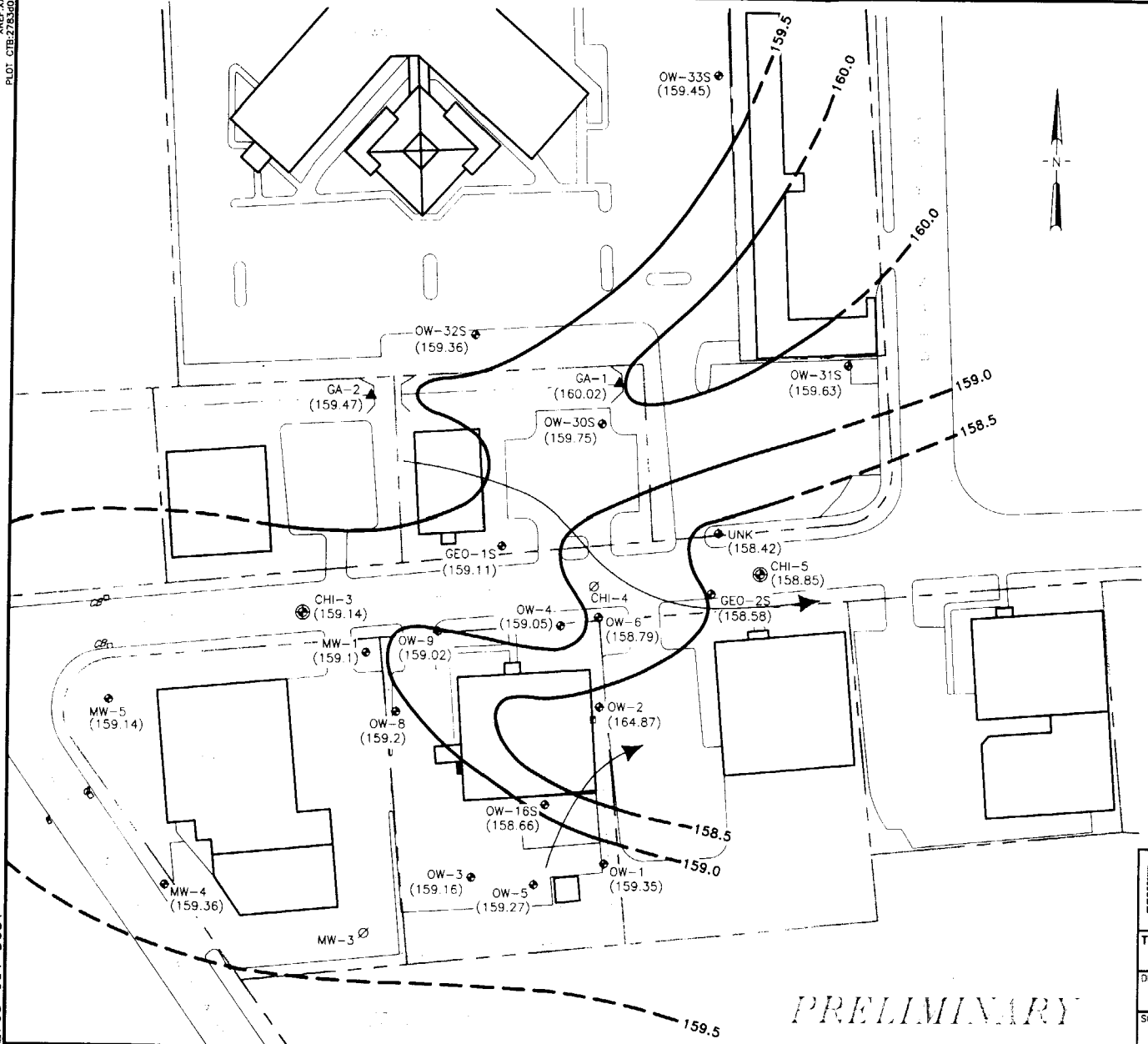
1 Reported concentrations are in micrograms per liter (ug/l) or ppb
2 USEPA Preliminary Remedial Goals (PRGs) for tap water are shown in italics where Method 1 Standards do not exist
3 Value was altered based upon results of Level 2 Data Validation
4 Methylene chloride was also detected in the trip blank
5 "J" Represents estimated value below the method detection limit
6 * Constituent of Concern
7 MCP = Massachusetts Contingency Plan
8 --- = Method 1 Standards or PRGs do not exist
9 ND(x) = Parameter not detected above method detection limit noted in parentheses
10 NA = Compound not analyzed
11 Blank = Compound not analyzed or compound not detected

TABLE 1
HISTORICAL GROUND WATER ANALYTICAL RESULTS
CLEAN HARBORS OF NATICK, INC.
10 MERCER ROAD
NATICK, MASSACHUSETTS

VOCs (USEPA 8260B)	MCP METHOD 1 STANDARDS			Well I.D. Numbers									
				11/08/00	11/07/00	7/23/02	11/07/00	11/10/00	7/25/02	7/25/02	7/24/02	7/24/02	7/24/02
	GW-1[2]	GW-2	GW-3	MW-2	MW-4	MW-5		GEO-1	GEO-1I	GEO-1S	GEO-2D	GEO-2I	GEO-2S
Acetone*	3,000	50,000	50,000	ND (4.7)	ND (4.7)	ND (1)	ND (4.7)	ND (4.7)	2 J	4 J	3 J	3 J	15
Benzene*	5	2,000	7,000	ND (0.5)	ND (0.5)	ND (0.04)	ND (0.5)	ND (0.5)	8	ND (0.04)	ND (0.04)	0.2 J	ND (0.04)
Chloroform*	5	400	10,000	ND (0.3)	ND (0.3)	ND (0.03)	ND (0.3)	ND (0.3)	ND (0.03)	ND (0.03)	ND (0.03)	0.3 J	ND (0.03)
1,1-Dichloroethane	70	9,000	50,000	ND (1.1)	ND (1.1)	ND (0.04)	ND (1.1)	ND (1.1)	9	ND (0.04)	6	4	ND (0.04)
1,2-Dichloroethane	5	20	50,000	ND (0.3)	ND (0.3)	ND (0.04)	4	ND (0.3)	6	ND (0.04)	ND (0.04)	ND (0.04)	ND (0.04)
1,1-Dichloroethene	7	1	50,000	ND (0.7)	ND (0.7)	ND (0.2)	ND (0.7)	ND (0.7)	0.4 J	ND (0.2)	0.9	0.5 J	ND (0.2)
cis-1,2-Dichloroethene	70	30,000	50,000	ND (0.4)	ND (0.4)	ND (0.02)	ND (0.4)	ND (0.4)	0.6	ND (0.02)	0.7	0.5	ND (0.02)
trans-1,2-Dichloroethene*	100	20,000	50,000	ND (0.4)	ND (0.4)	ND (0.2)	ND (0.4)	ND (0.4)	ND (0.2)	ND (0.2)	ND (0.2)	ND (0.2)	ND (0.2)
Ethylbenzene*	700	30,000	4,000	ND (0.4)	ND (0.4)	ND (0.1)	ND (0.4)	ND (0.4)	0.1 J	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)
4-Methyl-2-pentanone	*160*			ND (1.9)	ND (1.9)	ND (0.1)	ND (1.9)	ND (1.9)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)
2-Hexanone	*NA*			ND (1.6)	ND (1.6)	ND (0.1)	ND (1.6)	ND (1.6)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)
2-Butanone (MEK)	350	50,000	50,000	ND (2.7)	ND (2.7)	ND (0.3)	ND (2.7)	2	ND (0.3)	ND (0.3)	ND (0.3)	ND (0.3)	2 J
Methyl-t-butyl ether (MTBE)	70	50,000	50,000	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethene	5	3,000	5,000	ND (0.4)	ND (0.4)	ND (0.1)	ND (0.4)	ND (0.4)	ND (0.1)	ND (0.1)	ND (0.1)	0.2 J	ND (0.1)
Toluene*	1,000	6,000	50,000	ND (0.3)	ND (0.3)	ND (0.04)	ND (0.3)	ND (0.3)	ND (0.04)	ND (0.04)	ND (0.04)	ND (0.04)	ND (0.04)
Trichloroethene*	5	300	20,000	ND (0.5)	ND (0.5)	ND (0.1)	ND (0.5)	ND (0.5)	0.2 J	ND (0.1)	0.5	ND (0.1)	ND (0.1)
Vinyl chloride*	2	2	40,000	ND (0.5)	ND (0.5)	ND (0.1)	ND (0.5)	ND (0.5)	3	ND (0.1)	0.9	0.5 J	ND (0.1)
Total xylenes	10,000	6,000	50,000	ND (0.6)	ND (0.6)	ND (0.1)	ND (0.6)	ND (0.6)	ND (0.1)	ND (0.1)	ND (0.1)	0.3 J	ND (0.1)
Methylene chloride	5	50,000	50,000	ND (2.3)	ND (2.3)	ND (0.3)[4]	ND (2.3)	ND (2.3)	ND (0.3)	ND (0.3)	ND (0.3)[4]	ND (0.3)[4]	ND (0.3)
Chloromethane	*1.5*			ND (2.2)	ND (2.2)	ND (0.2)	ND (2.2)	ND (2.2)	ND (0.2)	ND (0.2)	ND (0.2)	ND (0.2)	ND (0.2)
Carbon disulfide	*1,000*			ND (0.7)	ND (0.7)	ND (0.3)	ND (0.7)	ND (0.7)	ND (0.3)	ND (0.3)	ND (0.3)	ND (0.3)	ND (0.3)
1,2-Dichlorobenzene	600	10,000	8,000			NA			NA	NA	NA	NA	NA
1,4-Dichlorobenzene	5	30,000	8,000			NA			NA	NA	NA	NA	NA
Bromodichloromethane	5	NA	50,000			ND (0.04)			ND (0.04)	ND (0.04)	ND (0.04)	0.5 J	ND (0.04)
Bromoform	5	800	50,000			ND (0.1)			ND (0.1)	ND (0.1)	ND (0.1)	0.4 J	ND (0.1)
Chlorobenzene	100	1,000	500			ND (0.03)			ND (0.03)	ND (0.03)	ND (0.03)	ND (0.03)	ND (0.03)
Dibromochloromethane	5		50,000			ND (0.1)			ND (0.1)	ND (0.1)	ND (0.1)	0.6	ND (0.1)
Naphthalene	20	6,000	6,000			NA			NA	NA	NA	NA	NA
trans-1,3-Dichloropropene	---					ND (0.1)			ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)

NOTES:

1. Reported concentrations are in micrograms per liter (ug/l) or ppb
2. USEPA Preliminary Remedial Goals (PRGs) for tap water are shown in italics where Method 1 Standards do not exist
3. Value was altered based upon results of Level 2 Data Validation
4. Methylene chloride was also detected in the trip blank
5. "J" Represents estimated value below the method detection limit
6. * Constituent of Concern
7. MCP = Massachusetts Contingency Plan
8. --- = Method 1 Standards or PRGs do not exist
9. ND(x) = Parameter not detected above method detection limit noted in parentheses
10. NA = Compound not analyzed
11. Blank = Compound not analyzed or compound not detected



LEGEND

OW-12	EXISTING MONITORING WELL
CHI-3	SMALL DIAMETER MONITORING WELL
GA-2	STREAM GAUGING AREA
— —	INTERMITTENT BROOK
. . .	CHAIN LINK FENCE
CB	CATCH BASIN
) (	CULVERT
(159.63)	GROUND WATER ELEVATION
159.0	GROUND WATER FLOW CONTOUR (DASHED WHERE INFERRED)
→	INFERRED GROUND WATER FLOW DIRECTION

NOTES:

1. GROUND WATER ELEVATIONS FROM MONITORING WELLS, CHI-5 AND OW-2, WERE NOT USED FOR CALCULATION OF GROUND WATER FLOW CONTOURS.

0 80 160
APPROX. SCALE IN FEET

GEO Insight INC

CLIENT: CLEAN HARBORS OF NATICK

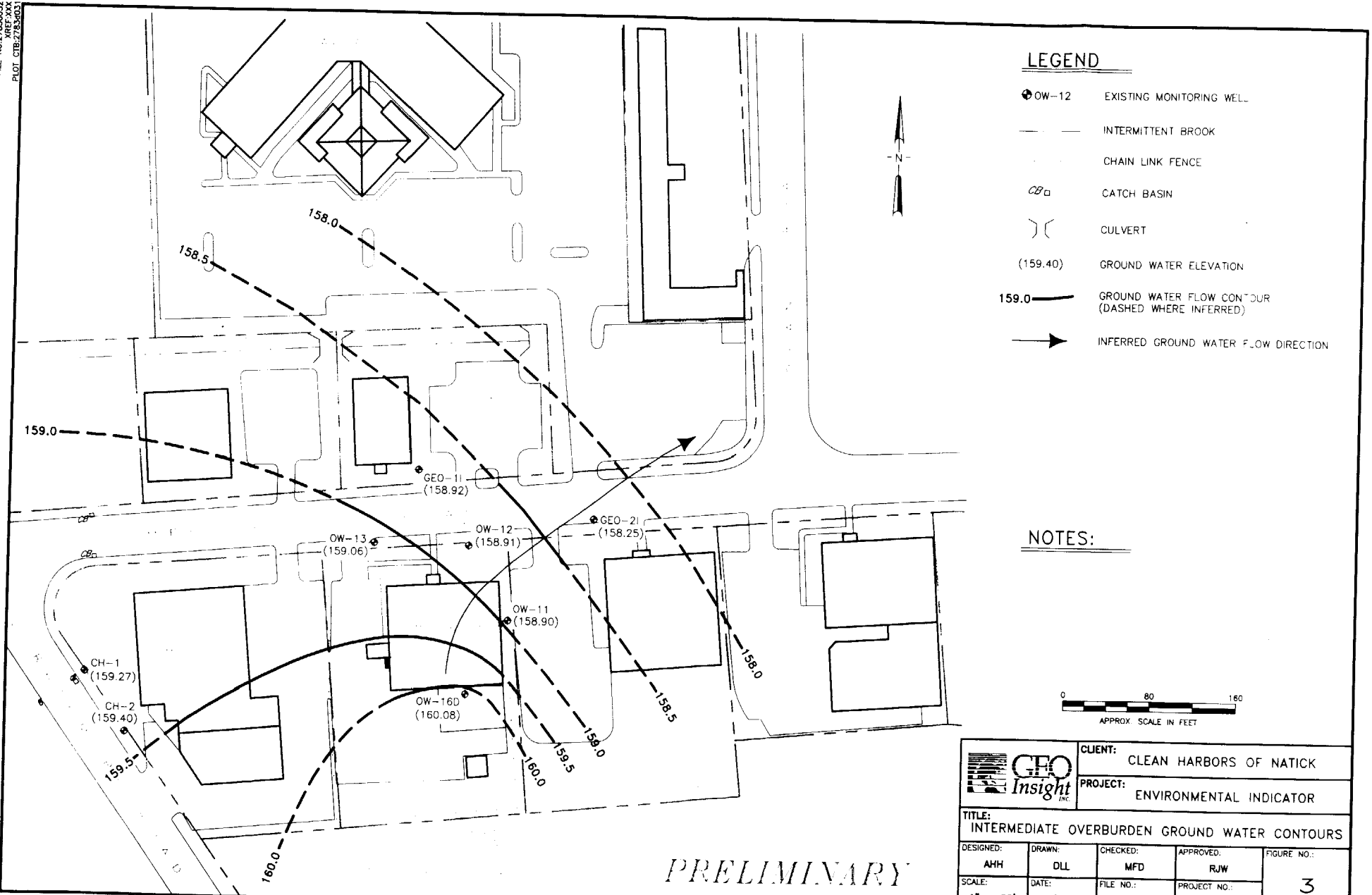
PROJECT: ENVIRONMENTAL INDICATOR

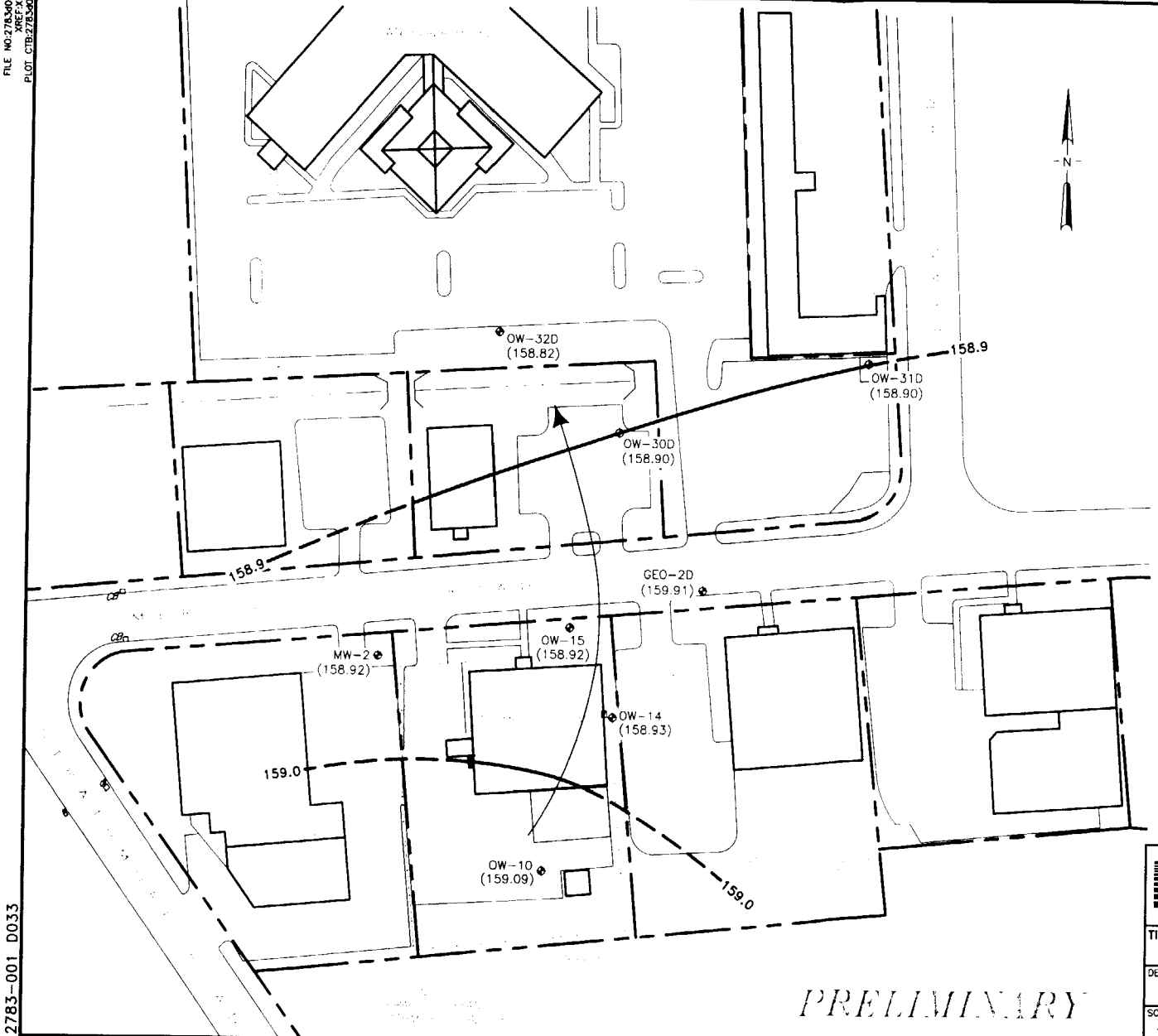
TITLE: SHALLOW OVERBURDEN GROUND WATER CONTOURS

DESIGNED:	DRAWN:	CHECKED:	APPROVED:	FIGURE NO.:
AHH	DLL	MFD	RJW	2
SCALE: 1" = 80'	DATE: 9/6/02	FILE NO.: 2783d031	PROJECT NO.: 2783-001	

2783-001 D031

FILE NO:2783d031
XREF:XXX
PLOT CTB:2783d031


FILE NO:2783d032
XREF:XXX
PLOT CTB:2783d031
LEGEND
OW-12 EXISTING MONITORING WELL
INTERMITTENT BROOK
CHAIN LINK FENCE
CB CATCH BASIN
CULVERT
(159.40) GROUND WATER ELEVATION
159.0 GROUND WATER FLOW CONTOUR (DASHED WHERE INFERRED)
INFERRED GROUND WATER FLOW DIRECTION
N
158.0
158.5
159.0
GEO-1I (158.92)
GEO-2I (158.25)
OW-13 (159.06)
OW-12 (158.91)
OW-11 (158.90)
OW-16D (160.08)
CH-1 (159.27)
CH-2 (159.40)
159.5
160.0
NOTES:
0 80 160
APPROX. SCALE IN FEET
PRELIMINARY
2783-001 D032
GEO Insight INC
CLIENT: CLEAN HARBORS OF NATICK
PROJECT: ENVIRONMENTAL INDICATOR
TITLE: INTERMEDIATE OVERBURDEN GROUND WATER CONTOURS
DESIGNED: AHH
DRAWN: DLL
CHECKED: MFD
APPROVED: RJW
FIGURE NO.: 3
SCALE: 1" = 80'
DATE: 9/6/02
FILE NO.: 2783d032
PROJECT NO.: 2783-001



LEGEND

- OW-15 — EXISTING MONITORING WELL
- INTERMITTENT BROOK
- CHAIN LINK FENCE
- CB — CATCH BASIN
- CULVERT
- (158.93) — GROUND WATER ELEVATION
- 159.0 — GROUND WATER FLOW CONTOUR (DASHED WHERE INFERRED)
- INFERRED GROUND WATER FLOW DIRECTION

NOTES:

0 80 160
APPROX. SCALE IN FEET

GEO Insight INC

CLIENT: CLEAN HARBORS OF NATICK

PROJECT: ENVIRONMENTAL INDICATOR

TITLE: DEEP OVERBURDEN GROUND WATER CONTOURS

DESIGNED:	DRAWN:	CHECKED:	APPROVED:	FIGURE NO.:
AHH	DLL	MFD	RJW	4
SCALE: 1" = 80'	DATE: 9/17/02	FILE NO.: 2783d033	PROJECT NO.: 2783-001	

FILE NO:2783d033
XREF:XXX
PLOT CTB:2783d031

2783-001 D033