SCANNED

KROLL ASSOCIATES, INC.

10 WATERVIEW BOULEVARD, PARSIPPANY, NEW JERSEY 07054

TELEPHONE: (201) 331-0700 FAX: (201) 335-2957

July 28, 1997

Commonwealth of Massachusetts
Department of Environmental Protection
Central Regional Office
75 Grove Street
Worcester, MA

Dear Sir/Madam:

Appended you will find a completed BWSC Form 103, Release Notification Form (RNF) for the above referenced property (the "Site").

During the removal of an abandoned subsurface water supply line, petroleum contaminated soil was encountered. Based on a Geoprobe delineation the volume of soil was initially thought to be within the parameters of a Limited Removal Action (LRA) [310CMR40.0318]. While awaiting analytical confirmation of post-excavation samples that the residual soil contamination was less than Reportable Concentrations (RCs), the subject area where the excavation had been undertaken was closed in order to accommodate the completion of the construction project.

The residual soil analysis reported levels in excess of the RCs, but within the parameters of a Class A-3 Response Action Outcome with an Activity and Use Limitation. Those documents are presently being prepared and will be submitted within the requisite time frame.

Should you have any questions regarding this matter do not hesitate to contact my office directly at (508) 443-1833.

Very truly yours,
KROLL ASSOCIATES, INC.

Neal M. Drawas, LSP

Encl.

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RDMS Doc ID 107639

SCANNED

I. SITE CONCERNS (Based upon conditions at time of PRA submittal)				
A. Indoor Air (Based upon conditions at time of submittal)	**Yes**	**No**	**?**	**Pg#**
1. ⚑ Applicable GW-2 standard exceeded @ residence/school with no soil gas/indoor air sampling		X		
2. ⚑ Site contaminants impacting indoor air		X		
B. Groundwater/Drinking Water (Based upon conditions at time of submittal)	**Yes**	**No**	**?**	**Pg#**
1. ⚑ More than 0.5" NAPL observed in any monitoring well		X		
2. Site within potential drinking water source area (PDWSA)		X		
3. Site located within IWPA/mapped Zone II		X		
4. Private/Non-municipal public well(s) (TNC, NTNC) located within 500 feet of site		X		
5. Municipal well(s) located within 1000 feet of site		X		
6. ⚑ Private well contaminated as a result of site		X		
7. ⚑ Public water supply contaminated as a result of site		X		
C. Soil (Based upon conditions at time of submittal)	**Yes**	**No**	**?**	**Pg#**
1. IH levels of Arsenic (40), Cadmium (60), Chromium (200), Cyanide (100), Mercury (300), Methyl Mercury (10), or PCBs (10) in surface soil (< 1 foot)		X		
D. Environmental Concerns	**Yes**	**No**	**?**	**Pg#**
1. Site within 500 feet of surface water and/or wetlands	X			
2. Endangered species habitat, ACEC and/or certified vernal pool within 500 feet			X	
3. Confirmed contamination of surface water, sediments and/or wetlands with site contaminants		X		
E. Site & Area Use (Choose all that apply)	**Yes**	**No**	**?**	**Pg#**
1. School/Institution/Playground		X		
2. Residential		X		
F. Released OHM (Primary Contaminant Type(s))	**Yes**	**No**	**?**	**Pg#**
1. Petroleum Fuel Oils (#2, #4, #6, Jet fuel, kerosene, lube oil, MODF, etc.)			X	
2. Gasoline, waste oil			X	
3. Metals, coal tar, PCBs, pesticides/herbicides, asbestos, PAHs, cyanide		X		
4. Chlorinated solvents or other organic compounds		X		
G. Site Complexity (Check all that apply)	**Yes**	**No**	**?**	**Pg#**
1. Co-mingled plumes (i.e., different sources from one or more sites co-mingled)			X	
2. Bedrock contamination			X	
If ⚑ conditions currently exist, see supervisor to discuss.				

Disclaimer: This checklist is for use by DEP in reviewing Preliminary Response Action (PRA) Statements, and may not be relied upon for any other purpose. This checklist is not a comprehensive list of PRA requirements, which are fully set forth in MGL c. 21E and 310CMR 40.0000. Completion of this checklist by DEP does not constitute a final agency decision, and does not create any legal rights or relieve any party of obligations that exist pursuant to applicable laws.

II. ADMINISTRATIVE ADEQUACY:		Citation(s)	Yes	No	?	NA	Pg #
A. Regulatory Deadlines							
1. Notification Made On Time Date:	8/5/1997	40.0300	X				
2. Phase I/TC within 1 Phase I/TC within 1 yr of notification; Effective Date/ Tier		40.0406				X	
3. Phase II submitted within 2 years of Tier Classification/Permit Effective Date		40.0550, 40.0560				X	
4. Phase III submitted with 2 years of Tier Classification/Permit Effective Date		40.0550, 40.0560				X	
5. Phase IV submitted within 3 years of Tier Classification/Permit Effective Date		40.0550, 40.0560				X	
6. RAO submitted within 5 years of Tier Classification/Permit Effective Date		40.0550, 40.0560				X	
7. Tier II Extension or Permit Extension submitted/ # of Extensions		40.0560(7), 40.0720				X	
8. For IRAs, submittal deadlines have been met (Plan within 60 days, Status Report within 120 days and every 6 months from approval or receipt of Plan, Completion Report within 60 days following completion of IRA activities, Remedial Monitoring Report monthly for IH/SRM or every 6 months for non-IH/SRM)		40.0404(2), 40.0420(7), 40.0425(1)(2)(6).40.0427(2)				X	
9. For RAMs, submittal deadlines have been met (Status Report within 120 days and every 6 months from approval or receipt of Plan, Completion Report within 60 days following completion of RAM activities, Remedial Monitoring Report every 6 months)		40.0404(2), 40.0445(1)(5), 40.0446(1)				X	
10. For URAMs, submittal deadlines have been met (Letter of Intent within 7 days, Status Report within 120 days and every 6 months from notification, Completion Report within 60 days following completion of URAM activities, Remedial Monitoring Report every 6 months)		40.0404(2), 40.0462, 40.0465(1)(5), 40.0466(1)				X	

III. TECHNICAL ADEQUACY:			Yes	No	?	NA	Pg #
A. Response Action Type							
1. Assessment Only		40.0332		X			
2. Innovative Technology				X			
3. Soil Excavation Volume			X				
a. Recycle				X			
b. Landfill				X			
c. Reuse				X			
d. Treat/Stabilize					X		
4. Cap/Cover/Engineered Barrier *Residual contaminated soil is covered by asphalt parking lot*				X			
a. Ph III completed when cap/engineered barrier was proposed or constructed as part of a Permanent Solution		40.0414(7)			X		

A. Response Action Type						
5. Construction of Building in Contaminated Area		X				
6 Groundwater Treatment			X			
a. Pump & Treat					X	
b. Removal (Vacuum)					X	
c. Free Product Recovery					X	
d. Bioremediation			X			
i. Application within 50' surface water/100' private well/800' public well	40.0046(3)				X	
7. Venting/Sub Slab Depressurization System			X			
8. Soil Vapor Extraction/Air Sparging			X			
9. Chemical Oxidation			X			
a. Application within 50' surface water/100' private well/800' public well	40.0046(3)				X	
B. Description of Response Actions – Indication That:		**Yes**	**No**	**?**	**NA**	**Pg #**
1. Plan/Status Report/Completion Report is adequate/complete	40.0420, 40.0440, 40.0460	X				
2. Response actions taken were in accordance with MassDEP approvals (i.e., special conditions, Interim deadlines, etc.)	40.0404(1), 40.0420(2), 40.0443(3), 40.0463(2)			X		
3. Response actions proposed or taken demonstrate the level of diligence necessary, consider relevant policies, methods or practices, or have been technically justified	40.0191, 40.0193	X				
4. Monitoring of response actions is adequate (soil, groundwater, air, dust, etc.)	40.0041			X		
5. Analytical or environmental monitoring data is scientifically valid and defensible, and of a level of precision and accuracy commensurate with its stated or intended use	40.0017				X	
6. System shutdown/operational problems	40.0041				X	
C. Remediation Waste – Indication That:		**Yes**	**No**	**?**	**NA**	**Pg #**
1. Remediation waste has been managed appropriately	40.0030				X	
2. Water/air discharges are within discharge limitations	40.0040				X	

IV. Preliminary Response Action Type	Citation(s)	Yes	No	?	NA	Pg#
A. Immediate Response Actions (required for 2/72-hr release) – Indication That:						
1. Release/TOR has been adequately assessed or additional assessment is planned	40.0405, 40.0414(2)				X	
2. An Imminent Hazard condition has been eliminated/controlled	40.0427				X	
3. A condition of Substantial Release Migration has been mitigated	40.0414				X	
4. An Imminent Hazard condition has been assessed	40.0414(3)&(4),40.0427(1)(c)				X	
5. . Excavation and stockpiling of >100 cyds (cum.) UST-related oil- or waste oil- contaminated soil before notification	40.0421(3)				X	
B. Release Abatement Measures – Indication That:		Yes	No	?	NA	Pg#
1. Off-site disposal of > 500 cubic yards (cumulative) of OHM-contaminated soil	40.0442(2)(a)		X			
2. On or off-site treatment, recycling, or reuse of > 1500 cubic yards (cum.) of OHM contaminated soil	40.0442(2)(b)		X			
3. Certification of sufficient financial resources if excavation of >1500 cyds (cum.) OHM contaminated soil	40.0442(5)				X	
4. RAM was initiated within one year of receipt of RAM Plan	40.0443(5)				X	
5. RAM fee paid, if prior to Tier Classification/RAO	40.0444(2)				X	
C. Utility-related Abatement Measures – Indication That:		Yes	No	?	NA	Pg#
1. During emergency repair, notification provided within 72-hours of conducting URAM	40.0462(3)				X	
2. A 2-hour or 72-hour reporting condition likely exists	40.0461(3)				X	
3. Excavation of >100 cyds (cum) oil- or waste oil-contaminated soil (LSP required)	40.0462(4)(a)				X	
4. Excavation of >20 cyds (cum.) haz. mat.-contaminated soil or mix (LSP required)	40.0462(4)(b)				X	
5. Temporary relocation of soil is returned to site or otherwise managed within 14 days	40.0462(6)				X	
6. Reasonable attempt made to notify property owner, except during non-business-hour emergency repairs	40.462(7)				X	

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-103

Release Tracking Number

2 - 11846

If assigned by DEP

RELEASE NOTIFICATION & NOTIFICATION RETRACTION FORM

Pursuant to 310 CMR 40.0335 and 310 CMR 40.0371 (Subpart C)

A. RELEASE OR THREAT OF RELEASE LOCATION:

Street: 355 Main Street Location Aid: opposite Arcade Pond

City/Town: Northbridge (Whitinsville) ZIP Code: 01588

B. THIS FORM IS BEING USED TO: (check one)

[X] Submit a **Release Notification** (complete all sections of this form).

[ ] Submit a **Retraction of a Previously Reported Notification** of a Release or Threat of Release (complete Sections A, B, E, F and G of this form). You MUST attach the supporting documentation required by 310 CMR 40.0335.

C. INFORMATION DESCRIBING THE RELEASE OR THREAT OF RELEASE (TOR):

Date and time you obtained knowledge of the Release or TOR. Date: 05-20-97 Time: 1000 Specify: [X] AM [ ] PM

The date you obtained knowledge is always required. The time you obtained knowledge is not required if reporting only 120 Day Conditions.

IF KNOWN, record date and time release or TOR occurred. Date: _____ Time: _____ Specify: [ ] AM [ ] PM

[ ] Check here if you previously provided an Oral Notification to DEP (2 Hour and 72 Hour Reporting Conditions only).

Provide date and time of Oral Notification. Date: _____ Time: _____ Specify: [ ] AM [ ] PM

Check all Notification Thresholds that apply to the Release or Threat of Release: (for more information see 310 CMR 40.0310 - 40.0315)

2 HOUR REPORTING CONDITIONS

- [ ] Sudden Release
- [ ] Threat of Sudden Release
- [ ] Oil Sheen on Surface Water
- [ ] Poses Imminent Hazard
- [ ] Could Pose Imminent Hazard
- [ ] Release Detected in Private Well
- [ ] Release to Storm Drain
- [ ] Sanitary Sewer Release (Imminent Hazard Only)

72 HOUR REPORTING CONDITIONS

- [ ] Subsurface Non-Aqueous Phase Liquid (NAPL) Equal to or Greater than 1/2 Inch
- [ ] Underground Storage Tank (UST) Release
- [ ] Threat of UST Release
- [ ] Release to Groundwater near Water Supply
- [ ] Release to Groundwater near School or Residence

120 DAY REPORTING CONDITIONS

- [X] Release of Hazardous Material(s) to Soil or Groundwater Exceeding Reportable Concentration(s)
- [X] Release of Oil to Soil Exceeding Reportable Concentration(s) and Affecting More than 2 Cubic Yards
- [ ] Release of Oil to Groundwater Exceeding Reportable Concentration(s)
- [ ] Subsurface Non-Aqueous Phase Liquid (NAPL) Equal to or Greater than 1/8 Inch and Less than 1/2 Inch

List below the Oils or Hazardous Materials that exceed their Reportable Concentration or Reportable Quantity by the greatest amount. If necessary, attach a list of additional Oil and Hazardous Material substances subject to reporting.

Name and Quantities of Oils (O) and Hazardous Materials (HM) Released:

O or HM Released	O (check one)	HM (check one)	CAS # (If known)	Amount or Concentration	Units	Reportable Concentrations Exceeded, if Applicable (RCS-1, RCS-2, RCGW-1, RCGW-2)
Oil (as TPH)	[X]	[ ]		5810	ppm	RCS-1
	[ ]	[ ]				
	[ ]	[ ]				

D. ADDITIONAL INVOLVED PARTIES:

[ ] Check here if attaching names and addresses of owners of properties affected by the Release or Threat of Release, other than an owner who is submitting this Release Notification (required).

[X] Check here if attaching Licensed Site Professional (LSP) name and address (optional).

You may write in names and addresses on the bottom of the second page of this form.

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-103

Release Tracking Number
2 - 11846
If assigned by DEP

RELEASE NOTIFICATION & NOTIFICATION RETRACTION FORM

Pursuant to 310 CMR 40.0335 and 310 CMR 40.0371 (Subpart C)

E. PERSON REQUIRED TO NOTIFY:

Name of Organization: WRT Management

Name of Contact: Len Jolles Title: Property Manager

Street: 1 Main Street

City/Town: Northbridge (Whitinsville) State: MA ZIP Code: 01588

Telephone: 508-234-6301 Ext.: FAX: (optional)

F. RELATIONSHIP OF PERSON REQUIRED TO NOTIFY TO RELEASE OR THREAT OF RELEASE: (check one)

[X] RP or PRP Specify: (X) Owner ( ) Operator ( ) Generator ( ) Transporter Other RP or PRP:

[ ] Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

[ ] Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

[ ] Any Person Otherwise Required to Notify Specify Relationship:

G. CERTIFICATION OF PERSON REQUIRED TO NOTIFY:

I, _____, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of 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.

By: _____ Title: President
(signature)

For: WRT MANAGEMENT Date: Aug 1, 1997
(print name of person or entity recorded in Section E)

Enter address of the person providing certification, if different from address recorded in Section E:

Street:

City/Town: State: ZIP Code:

Telephone: Ext.: FAX: (optional)

YOU MUST 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.

RECEIVED
AUG - 5 1997
DEP
CENTRAL REGION

Fold at line over top of envelope

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

WRT Management
1 Main St
Northeast Mass
Attn: Ken Jolla

4a. Article Number

P053 173575

4b. Service Type

☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

8/28/97

5. Received By: *(Print Name)*

X Diane Carney 8-29-97

6. Signature: *(Addressee or Agent)*

X Diane Ca

8. Addressee's Address *(Only if requested and fee is paid)*

PS Form 3811, December 1994 102595-97-B-0179 Domestic Return Receipt

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE

WORCESTER PM 26 AUG 1997

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

DEPT. OF ENVIRONMENTAL PROTECTION
CENTRAL REGION
627 MAIN ST.
WORCESTER, MA 01608

BH.

P 053 173 575

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail *(See reverse)*

Sent to WRT Management	
Street & Number 1 Main Street	
Post Office, State, & ZIP Code Northbridge, MA 01588	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date 2-11846 8-21-97	

355 Main Street
Northbridge, MA 01588

PS Form 3800, April 1995

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL REGIONAL OFFICE

ARGEO PAUL CELLUCCI
Governor

TRUDY COXE
Secretary

DAVID B. STRUHS
Commissioner

URGENT LEGAL MATTER: PROMPT ACTION NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

August 26, 1997

WRT Management
1 Main Street
Northbridge, MA 01588

RE: CRWSC - Northbridge
355 Main Street

Attention: Len Jolles,
Property Manager

Release Tracking #2-11846

NOTICE OF RESPONSIBILITY
120-DAY NOTIFICATION
M.G.L. c. 21E, 310 CMR 40.0000

Dear Mr. Jolles:

Thank you for submitting the Oil and Hazardous Material Release Notification Form (RNF) received by the Department of Environmental Protection (the Department) on August 5, 1997. In light of this action, the Department wishes to ensure that you (as used in this notice, "you" refers to WRT Management) are aware of your rights and responsibilities under the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, M.G.L. c. 21E, and the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000.

The information contained in your submittal indicates that the above-referenced property has been subject to a release of oil to soil in excess of the applicable reportable concentrations. Based on this information, the Department has reason to believe that the property, or portions thereof, is a disposal site which requires a response action. The cleanup of disposal sites is governed by M.G.L. c. 21E and the MCP.

Information available to the Department also indicates that you are a party with potential liability for response action costs and damages under M.G.L. c. 21E, § 5. The attached summary provides information about liability under Chapter 21E to assist you in deciding what actions to take in response to this notice.

627 Main Street • Worcester, Massachusetts 01608 • Telephone (508) 792-7653

Fax (508)792-7621
Printed on Recycled Paper
TTD #(508)767-2788

You should be aware that you may have claims against third parties for damages, including claims for contribution or reimbursement for the costs of cleanup. Such claims do not exist indefinitely but are governed by laws which establish the time allowed for bringing litigation. The Department encourages you to take any action necessary to protect any such claims you may have against third parties.

ACTIONS UNDERTAKEN TO DATE AT THE SITE

On August 5, 1997, the Department received an RNF for the above-referenced site. According to the RNF, total petroleum hydrocarbons (TPH) are present in soil at the site at concentrations up to 5,810 parts per million (ppm). This concentration exceeds the Reportable Concentration of 500 ppm identified in the RNF.

The Department has assigned Release Tracking #2-11846 to the release of oil. The Department has no information regarding other actions conducted or proposed in response to this release.

NECESSARY RESPONSE ACTIONS AND APPLICABLE DEADLINES

Please be advised that August 5, 1997 is considered to be the date of release/threat of release notification for this release. Unless otherwise stated, this date will be the baseline for calculating compliance with deadlines contained within the MCP.

No disposal site will be deemed to have had all the necessary and required response actions taken for it unless and until all substantial hazards presented by the release and/or threat of release have been eliminated and a level of no significant risk exists or has been achieved in compliance with the MCP.

The MCP requires persons undertaking response actions at a disposal site to submit to the Department a Response Action Outcome Statement prepared by a Licensed Site Professional upon determining that a level of no significant risk already exists or has been achieved at the disposal site. **A fee of $750.00 is assessed if an RAO is filed 120 days after release notification, but before Tier Classification.** If all remediation work has been completed, you are encouraged to submit the RAO promptly to avoid the fee.

Unless otherwise provided by the Department, responsible parties have one year from the initial date notice of a release or threat of release is provided to the Department pursuant to 310 CMR 40.0300 or from the date the Department issues a Notice of Responsibility, whichever occurs earlier, to file with the Department one of the following submittals: (1) a completed Tier Classification Submittal; or (2) a Response Action Outcome Statement. If required by the MCP, a completed Tier I Permit Application must also accompany a Tier Classification Submittal. The deadline for these submittals for this release is **August 5, 1998.**

The MCP requires responsible parties and any other person undertaking response actions to perform Immediate Response Actions in response to sudden releases, Imminent Hazards and Conditions of Substantial Release Migration. Such persons must continue to evaluate the need for Immediate Response Actions and notify the Department immediately if such a need exists.

PROCEDURES TO FOLLOW TO UNDERTAKE RESPONSE ACTIONS

The Department encourages parties having liability under M.G.L. c. 21E to take prompt action in response to releases and threats of release of oil and hazardous materials. By taking prompt action, liable parties may significantly lower cleanup costs and avoid the imposition of, or reduce the amount of, certain permit and/or annual compliance assurance fees payable under 310 CMR 4.00 (e.g., no annual compliance assurance fee is due for Response Action Outcome Statements submitted to the Department within 120 days of the initial date of release notification).

You must continue to employ or engage a Licensed Site Professional to manage, supervise or perform all response actions which you intend to undertake at this disposal site. You may obtain a list of the names and addresses of Licensed Site Professionals by contacting the Board of Registration of Hazardous Waste Site Cleanup Professionals by telephone at (617) 556-1145 or in person or by mail at One Winter Street, 6th Floor, Boston, Massachusetts 02108.

If you have any further questions, please contact the Central Regional Office at the letterhead address or at 508/792-7653. All future correspondence communications regarding this release should reference Release Tracking #2-11846.

Sincerely,

Edmond G. Benoit
Deputy Regional Director
Waste Site Cleanup

EGB\FS\DMT
Enclosure
cc: Northbridge Health Department
Northbridge Fire Department
Kroll Associates, 10 Waterview Boulevard, Parsippany, NJ 07054
Database Entry

2-11846.nor

SUMMARY OF LIABILITY UNDER CHAPTER 21E

As stated in the Notice of Responsibility accompanying this summary, the Department has reason to believe that you are a Potentially Responsible Party ("PRP") with potential liability under M.G.L. c. 21E, section 5, for response action costs and damages to natural resources caused by the release and/or threat of release. The Department has identified you as a PRP because it believes you fall within one or more of the following categories of persons made potentially liable by subsection 5(a):

- any current owner or operator of a site from or at which there is or has been a release or threat of release of oil and/or hazardous material;

- any person who owned or operated a site at the time hazardous material was stored or disposed of;

- any person who arranged for the transport, disposal, storage or treatment of hazardous material to or at a site;

- any person who transported hazardous material to a transport, disposal, storage or treatment site from which there is or has been a release or threat of release of such material; and

- any person who otherwise caused or is legally responsible for a release or threat of release of oil or hazardous material at a site.

For purposes of the MCP, you are considered a Responsible Party ("RP") with actual liability under Chapter 21E if you fall within one of these categories unless you (1) are entitled to a defense under section 5 or other applicable law, and (2) have reasonably incurred cleanup costs in an amount equal to or greater than any applicable cap on liability under subsection 5(d).

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

Section 5 provides a few narrowly drawn defenses to liability, including a defense for releases and damages caused by an act of God, an act of war or an act by a third party other than an employee, agent or person with whom the party has a contractual relationship (*see* subsection 5(c)); a defense for certain owners of residential property at which the owner maintains a permanent residence (*see* subsection 5(h)); and a defense for certain public utilities and agencies of the Commonwealth which own a right-of-way

that is a site (*see* subsection 5(j)).

You may voluntarily undertake response actions under the MCP without having your liability under Chapter 21E formally adjudicated by the Department. If you do not take the necessary response actions, or fail to perform them in an appropriate and timely manner, the Department is authorized by Chapter 21E to perform the necessary work.

By taking the necessary response actions, you can avoid liability for response action costs incurred by the Department in performing these actions. If you are an RP and you fail to perform necessary response actions at the site, you may be held liable for up to three (3) times all response action costs incurred by the Department and sanctions may be imposed on you for failure to perform response actions required by the MCP.

Response action costs include, without limitation, the cost of direct hours spent by Department employees arranging for response actions or overseeing work performed by persons other than the Department or its contractors, expenses incurred by the Department in support of those direct hours, and payments to the Department's contractors (for more detail on cost liability, *see* 310 CMR 40.1200: Cost Recovery). The Department may also assess interest on costs incurred at the rate of twelve percent (12%), compounded annually.

Any liability to the Commonwealth under Chapter 21E constitutes a debt to the Commonwealth. To secure payment of this debt, the Department may place liens on all of your property in the Commonwealth under M.G.L. c. 21E, section 13. To recover this debt, the Commonwealth may foreclose on these liens or the Attorney General may bring legal action against you.

In addition to your potential liability for response action costs and damages to natural resources caused by the release, civil and criminal liability may also be imposed by a court of competent jurisdiction under M.G.L. c. 21E, section 11, and civil administrative penalties may be assessed by the Department under M.G.L. c. 21A, section 16, for each violation of Chapter 21E, the MCP or any order, permit or approval issued thereunder.

If you are an RP and you have reason to believe that your performance of the necessary response actions is beyond your technical, financial or legal ability, you should promptly notify the Department in writing of your inability in accordance with Chapter 21E, subsection 5(e), and 310 CMR 40.0172. If you assert and demonstrate in compliance therewith that performing or paying for such response action is beyond your ability, subsection 5(e) provides you with a limited defense to an action by the Commonwealth for recovery of two to three times the Department's response action costs and 310 CMR 40.0172 provides you with a limited defense to the Department's assessment of civil administrative penalties.

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL REGIONAL OFFICE, 627 Main St., Worcester, MA 01605

ARGEO PAUL CELLUCCI
Governor

JANE SWIFT
Lieutenant Governor

BOB DURAND
Secretary

EDWARD P. KUNCE
Acting Commissioner

RECEIVED
MAY 1 1999

WRT MGMT
1 MAIN ST,
WHITINSVILLE, MA 01588-0000
ATTN: **LEN JOLLES**

May 7, 1999

RE: **NORTHBRIDGE, 2-0011846**
355 MAIN ST,
NOTICE OF AUDIT

Dear LEN JOLLES:

On August 5, 1998, the Legislature enacted the "Brownfields Act" which provides new incentives for parties to clean up and reuse contaminated property in Massachusetts. The legislation also calls on the Department of Environmental Protection to conduct targeted audits of all sites at which Activity and Use Limitations ("AULs") have been implemented. The goal of these audits is to determine whether response actions performed at a site comply with the Massachusetts Contingency Plan, 310 CMR 40.0000 ("MCP"), and Chapter 21E.

The Department's records indicate that on 12/8/97 a Class A3 Response Action Outcome (RAO) Statement and AUL were submitted for the above referenced site ("Site"). The Department's Central Regional Office will conduct an audit of this Site following the procedures set forth at 310 CMR 40.1100. All audits will include a file review of the AUL submitted for the Site, and some will also include a Site inspection and/or comprehensive review of the RAO documentation. If additional information and/or access to the Site is necessary at the time of the audit, you will be notified. Attached please find a fact sheet that describes the Activity and Use Limitation Audit Project in greater detail.

This Notice is being sent to all parties who have submitted an AUL as part of their RAO and to the Licensed Site Professional(s)-of-Record ("LSP-of-Record") for these sites. If you are no longer the contact person for the subject Site, please notify Mr. Thomas M. Potter in writing at the Massachusetts Department of Environmental Protection, Bureau of Waste Site Cleanup, One Winter Street, 7th Floor, Boston, Massachusetts, 02108.

If you have any questions regarding the contents of this Notice, please call the "MCP Help Line" during regular business hours on Monday through Thursday (voicemail messages left on Friday will be returned the following Monday). Help Line staff is available to answer your questions and provide you with information on current policies, guidance, and fact sheets. From area code 617 and outside Massachusetts, call (617) 338-2255. From outside the 617 area code call (800) 462-0444. Information is also available through DEP's web site (http://www.state.ma.us/dep/bwsc)

Very truly yours,

Thomas M. Potter
Audit Coordinator
Compliance & Enforcement
Bureau of Waste Site Cleanup

Attachments: Activity & Use Limitation Audit Project Fact Sheet

cc: Board of Health, NORTHBRIDGE, MA
Chief Municipal Officer, NORTHBRIDGE, MA
Building Inspector, NORTHBRIDGE, MA
Planning/Zoning Office, NORTHBRIDGE, MA

LSP (S): NEAL DRAWAS, 9844
Regional Audit File
DEP Boston File

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central Regional Office, 627 Main Street, Worcester, MA 01608

File Copy

JANE SWIFT
Governor

BOB DURAND
Secretary

LAUREN A. LISS
Commissioner

DEC 14 2001

WRT Management
1 Main Street
Whitinsville, MA 01588

Attention: Leonard Jolles,
Property Manager

Re: CRWSC - Northbridge
RAO, AUL
Opposite Arcade Pond
355 Main Street

RTN 2-11846

RAO SCREENING REVIEW
AUL SUMMARY COMPLIANCE REVIEW

Dear Mr. Jolles,

On December 8, 1997, the Department of Environmental Protection (the Department) received a Class A-3 Response Action Outcome (RAO) Statement and Activity & Use Limitation (AUL) for the above-referenced site. On August 5, 1998, the Legislature enacted the "Brownfields Act" which called on the Department of Environmental Protection to conduct targeted audits of sites at which Activity and Use Limitations ("AULs") have been implemented in order to ensure that these sites are meeting the requirements of Massachusetts laws and regulations, including Massachusetts General Law chapter 21E and the Massachusetts Contingency Plan (MCP). The Department's audit of this site consisted of a RAO screening review and an AUL Summary Compliance Review.

RESPONSE ACTION OUTCOME (RAO) SCREENING REVIEW

A screening review of the Response Action Outcome (RAO) was performed using a standard Department checklist. Examples of the Department's checklists are available on the Internet at http://www.state.ma.us/dep/bwsc/audits.htm. Based on the screening review of the RAO, the Department is not directing you to undertake further response actions at this time with regard to the RAO. Please note, however, that the review conducted by the Department on the RAO was not a comprehensive audit, and the Department reserves the right to conduct a comprehensive audit of the RAO at any time in the future. It is possible that a future audit of the RAO, if one

occurs, may identify deficiencies and/or violations of applicable laws and regulations, and may require you to undertake further response actions at the site.

AUL SUMMARY COMPLIANCE REVIEW

The Department has established special procedures for reviewing AULs recorded on or before October 29, 1999, including the AUL Notice instrument submitted as part of the Response Action Outcome (RAO) for your site. Please note that these procedures do not apply to AULs recorded on or after October 30, 1999, and this Summary of AUL Compliance Review should not be relied upon to predict audit results for such AULs.

Applying the procedures described above, the Department has not identified any errors in the AUL Notice instrument that require correction. In order to ensure that the public is aware of the restrictions that the AUL imposes at the site, the Department may issue a public notice identifying the site and the location of the AUL at the Registry of Deeds. Such notice may be published in a local newspaper and/or on the Internet.

LICENSED SITE PROFESSIONAL

A copy of this letter has been sent to Neal Drawas, LSP#9844, the LSP-of-Record for the Disposal site.

LIMITATIONS & RESERVATION OF RIGHTS

Please note that the screening review conducted by the Department on the RAO was not a comprehensive audit, and the Department reserves the right to conduct a comprehensive audit of the RAO at any time in the future. It is possible that a future comprehensive audit, if one occurs, may identify violations of applicable laws and regulations, may require you to undertake further response actions at the site, and may invalidate the Activity & Use Limitation. The screening review is not a representation by the Department that the RAO complies with M.G.L. c.21E, 310 CMR 40.0000, or any other laws, regulations, or requirements.

The Department's findings were based upon the accuracy and certainty of the information reviewed during the audit. These findings do not: (1) preclude future audits of past, current, or future actions at the site; (2) apply to actions or other aspects of the site that were not reviewed in the audit; (3) in any way constitute a release from any liability, obligation, action or penalty under M.G.L. c. 21E, 310 CMR 40.0000, or any other laws, regulations, or requirements. The Department retains authority to take or arrange, or to require any Responsible Party or Potentially Responsible Party to perform any response action authorized by M.G.L. c. 21E, which the Department deems necessary to protect health, safety, public welfare, or the environment.

If you have any questions regarding this letter, please contact Greg Root at 508-849-4017. Please reference the Release Tracking Number 2-11846 in any future correspondence to the Department regarding the site.

Very truly yours,

DEC 14 2001

Mary Gardner
Section Chief
Audits and Site Management
Bureau of Waste Site Cleanup

11846aulscreen

cc : Town of Northbridge, Board of Selectmen
Town of Northbridge, Board of Health
Town of Northbridge, Zoning Code Enforcement Official
Town of Northbridge Building Inspector
Neal Drawas, LSP-of-Record LSP #9844
Thomas M. Potter, Audit Coordinator, DEP-Boston
Jim Moody, DEP
Data Entry: [AUL/TSAUD RAO/TSAUD AUDTEC/NAFNVD]

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC102

RELEASE AMENDMENT FORM

Release Tracking Number
2 - 11846

A. RELEASE/SITE LOCATION:

1. Site Name/Location Aid: OPPOSITE ARCADE POND
2. Street Address: 355 MAIN ST
3. City/Town: WHITINSVILLE, NORTHBRIDGE
4. ZIP Code: 015880000

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

1. Date of Response(s): 5/29/2009 (mm/dd/yyyy) Start Time: 10:00 (hh:mm) ☑ AM ☐ PM

☐ 2. Record an **Initial Compliance Field Response - Announced.**
☐ 3. Record an **Initial Compliance Field Response - Unannounced.**
☑ 4. Record a **Compliance Field Response - Announced.**
☐ 5. Record a **Compliance Field Response - Unannounced.**
☐ 6. Record a **Field Response - Direct Oversight.**
☐ 7. Record a **Follow-up or Other Field Response.**
☐ 8. Record a **Follow-up Office Response.**
☐ 9. Identify or Update **a PRP or Other Person Associated with Release.** (Fill out Section E)
☐ 10. Correct or Add **Data to WSC Database** otherwise not specified on this form. (Record in Section C and, if needed, F)

C. DESCRIPTION OF ACTIVITIES RECORDED BY THIS FORM : (If additional lines are needed, record in Section F.)

STEPHANIE KELLY AND I CONDUCTED A SHORT NOTICE AUDIT INSPECTION AT THE CORE-MARK WAREHOUSE THIS MORNING IN RESPONSE TO INQUIRIES. WE MET WITH NEAL DRAWAS, LSP, LEONARD JOLLES, OWNER REPRESENTATIVE, TIM BEAUBIEN, MANAGER OF PERFORMANCE CONTRACTING, INC., AND PAUL CONNORS AND CRAIG SASSE OF TRIUMVIRATE ENVIRONMENTAL. THEY ARE CONDUCTING A POST-RAO RAM WITHIN AN AUL AREA TO INSTALL ADDITIONAL LOADING DOCKS TO THE EXISTING WAREHOUSE. THE OWNER SUBMITTED A RAM PLAN IN APRIL THAT PROPOSED THE REMOVAL OF UP TO 500 CY AND OFF SITE DISPOSAL OF DEWATERING IF NEEDED. THE INITIAL PLAN UNDERESTIMATED THE VOLUME OF SOIL TO BE EXCAVATED AND THE VOLUME OF GROUNDWATER TO BE DEWATERED, SO A RAM MODIFICATION WAS SUBMITTED TO INCREASE THE VOLUME OF SOIL TO 1450 CY AND CONDUCT ON SITE TREATMENT AND DISCHARGE OF THE WATER UNDER A NPDES PERMIT.

D. DEP STAFF AND FORM PREPARER:

1. DEP Staff: a. Name: VIGEANT PAUL ☐ b. Check here, if Unassigned (or staff name not applicable).
2. Preparer Signature: Paul Vigeant 3. Date: 05/29/2009

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC102

RELEASE AMENDMENT FORM

Release Tracking Number
2 - 11846

E. PRP OR OTHER PERSON ASSOCIATED WITH RELEASE :

1. Check all that apply: ☐ a. change in contact name ☐ b. change of address ☐ c. new person associated with release

2. Name of Organization:

3. Contact First Name: NEAL M 4. Last Name: DRAWAS

5. Street: 15 COLONIAL RD 6. Title:

7. City/Town: SUDBURY 8. State: MA 9. ZIP Code: 017760000

10. Telephone: 9784431833 11. Ext.: 12. FAX: 9784431929

13. Relationship of Person to Release: ☐ a. PRP ☑ b. Other c. Type Licensed Site Professional

F. ADDITIONAL DESCRIPTION:

THE EXCAVATION WORK WAS ONGOING DURING THE INSPECTION. WE OBSERVED A STOCKPILE CONTAINING ABOUT 1,000 CY OF OILY SOIL. THE STOCKPILE WAS WELL COVERED BUT HAD A MODERATE OIL ODOR SIMILAR TO CUTTING OIL. APPROXIMATELY 40 FRAC TANKS ARE STAGED ON SITE, AND MOST ARE FILLED WITH WATER FROM DEWATERING. THEY ARE AWAITING A NPDES DISCHARGE PERMIT TO TREAT AND DISCHARGE THE WATER. THE EXCAVATION SHOULD BE COMPLETED NEXT WEEK AND THE SOIL WILL BE TRANSPORTED OFF SITE AS SOON AS POSSIBLE. THE WORK APPEARS TO BE IN COMPLIANCE WITH THEIR RAM PLAN AND THE AUL. MR. SASSE PRODUCED THE HEALTH AND SAFETY PLAN FOR THE SITE, WITH DAILY SIGNATURES OF ALL THE SITE WORKERS. WE OBSERVED NO VIOLATIONS DURING OUR INSPECTION. I REQUESTED COPIES OF THE AVAILABLE SOIL AND GROUNDWATER ANALYSES RESULTS. MR DRAWAS GAVE ME A COPY OF THE NPDES PERMIT APPLICATION THAT HAS THE GROUNDWATER RESULTS. MR SASSE AGREED TO SEND THE SOIL RESULTS BY EMAIL TODAY.

AUDIT INSPECTION SCREENING CHECKLIST

LEAD RTN: 2 - 11846	Date Inspected__May 29, 2009__	Action Inspected:___RAM_____
TOWN: NORTHBRIDGE	Site Name WAREHOUSE	
ADDRESS: 355 MAIN STREET		
PRP/OP: ARCADE RT	LSP/Consultant NEAL DRAWAS	

Condition	Yes/No	Comments
Public Health		
>NAPL w/in 15 feet of ground surface	N	
>5 mg/l total VOCs <15' & within 30 feet school/residence	N	
OHM in surficial soil in S-1area (school/residence/park)	N	
Potential for impacts to nearby receptors	N	
Private wells<500 feet, Zone II, or IWPA	N	
Public Safety		
Accessible pits/lagoons/ debris related to clean-up	N	
Possible fire/explosion hazard	N	
Remedial system not secured	N	
Public Welfare		
Odors/dust/debris/appearance problem	N	
Environment		
Within 500 feet of surface water, ACEC and/or wetlands	Y	
Confirmed contamination of surface water and/or wetlands	N	
Multiple sources of OHM	Y	
Multiple media affected (GW & surface water, soil & air)	Y	
Regulatory Requirements		
Remediation Waste Issues [310 CMR 40.0030]		
Failure to remove remediation waste w/in 120 days	N	
Failure to properly implement BOL process	N	
Preliminary Response Actions		
Immediate Response Actions [310 CMR 40.0411]		
Failure to notify of new release or new condition	N	
Current IRA condition not addressed	N	
Missed deadlines (Forms/Reports)	N	
Failure to comply with IRA Approval/Plan/Conditions	N	
Failure to perform Imminent Hazard Evaluation (40.0426)	N	
Failure to notify of field activities	N	
Assessment & Receptor Issues		
Risk Characterization [310 CMR 40.0900]		
Soil/groundwater category omitted or misidentified	N	
Missed receptors (private wells, wetlands, etc.)	N	
Inadequate soil/groundwater sampling	N	
Extent of contamination not defined	N	
COC/OHM not analyzed for and/or evaluated	N	
Potential migration pathway not evaluated	N	
Potential Source not identified or assessed	N	

Site Summary/Release History/Inspection Highlights/Comments:

STEPHANIE KELLY AND I CONDUCTED A SHORT NOTICE AUDIT INSPECTION AT THE CORE-MARK WAREHOUSE THIS MORNING IN RESPONSE TO INQUIRIES. THEY ARE CONDUCTING A POST-RAO RAM WITHIN AN AUL AREA TO INSTALL ADDITIONAL LOADING DOCKS TO THE EXISTING WAREHOUSE. THE OWNER SUBMITTED A RAM PLAN IN APRIL THAT PROPOSED THE REMOVAL OF UP TO 500 CY AND OFF SITE DISPOSAL OF DEWATERING IF NEEDED. THE INITIAL PLAN UNDERESTIMATED THE VOLUME OF SOIL TO BE EXCAVATED AND THE VOLUME OF GROUNDWATER TO BE DEWATERED, SO A RAM MODIFICATION WAS SUBMITTED TO INCREASE THE VOLUME OF SOIL TO 1450 CY AND CONDUCT ON SITE TREATMENT AND DISCHARGE OF THE WATER UNDER A NPDES PERMIT.

MassDEP Inspector/Signature: PAUL VIGEANT PV Date: MAY 29, 2009

File

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central Regional Office, 627 Main Street, Worcester, MA 01608

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

JUN 17 2009

WRT Management
1 Main Street
Whitinsville, MA 01588
Attention: Len Jolles, Property Manager

RE: **NOTICE OF AUDIT FINDINGS**
Northbridge
355 Main Street
RTN: 2-0011846

Dear Mr. Jolles:

On May 29, 2009, the Massachusetts Department of Environmental Protection (MassDEP, the Department) conducted an audit inspection at the location identified above. This notice informs you of the results of MassDEP's audit.

The audit site inspection was conducted by Paul Vigeant and Stephanie Kelley of the MassDEP's Central Regional Office with you and Neal Drawas, LSP in attendance. In particular the audit focused primarily on the post-RAO Release Abatement Measure (RAM) for the site. The RAM currently includes soil excavation and dewatering with treatment and discharge under a NPDES permit. This work is being done to facilitate the construction of additional loading docks within an area having a recorded Activity and Use Limitation.

NO VIOLATIONS IDENTIFIED

MassDEP did not identify any violations of the requirements applicable to the RAM at the site. A copy of the applicable Audit Inspection Checklist is attached.

LICENSED SITE PROFESSIONAL (LSP)

A copy of this notice has been sent to Neal Drawas, the current LSP-of-Record for the disposal site.

LIMITATIONS

The audit inspection did not include a compliance review of all the response actions taken to date at this site. The audit was focused primarily on compliance with obligation and maintenance conditions as detailed in reports and observed on May 29, 2009.

MassDEP's findings were based on the certainty of the information reviewed during the audit. These findings do not: (1) apply to actions or other aspects of the site that were not reviewed in the audit, (2) preclude future audits of past, current, or future actions at the site, (3) in any way constitute a release from any liability, obligation, action or penalty under M.G.L. c. 21E, 310 CMR 40.0000, or any other law, regulation, or requirement, or (4) limit MassDEP's authority to take or arrange, or to require any Responsible Party or Potentially Responsible Party to perform, any response action authorized by M.G.L. c. 21E which MassDEP deems necessary to protect health, safety, public welfare, or the environment.

If you have any questions regarding this Notice, please contact Paul Vigeant at (508) 767-2810. Please reference the Release Tracking Number, RTN 2-0011846, in any future correspondence to MassDEP regarding the site.

Sincerely,

Diane T. Belliveau

Date: JUN 17 2009

Diane T. Belliveau, P.E.
Section Chief
Compliance and Risk Reduction
Bureau of Waste Site Cleanup

DTB/PAS/pv

Enc. Audit Inspection Screening Checklist

cc: Northbridge Board of Health
Neal Drawas, LSP, Marsh Risk Consulting, 15 Colonial Road, Sudbury, MA 01776
File
Database [RR/SNAUDI AUDCOM/NAFNVD]

ec: Lisa Alexander, Audit Coordinator, MassDEP-Boston
Mark Baldi, BWSC CERO Audit Section Chief

AUDIT INSPECTION SCREENING CHECKLIST

LEAD RTN: 2 - 11846	Date Inspected__May 29, 2009__	Action Inspected:___RAM_____
TOWN: NORTHBRIDGE	Site Name WAREHOUSE	
ADDRESS: 355 MAIN STREET		
PRP/OP: ARCADE RT	LSP/Consultant NEAL DRAWAS	

Condition	Yes/No	Comments
Public Health		
>NAPL w/in 15 feet of ground surface	N	
>5 mg/l total VOCs <15' & within 30 feet school/residence	N	
OHM in surficial soil in S-1area (school/residence/park)	N	
Potential for impacts to nearby receptors	N	
Private wells<500 feet, Zone II, or IWPA	N	
Public Safety		
Accessible pits/lagoons/ debris related to clean-up	N	
Possible fire/explosion hazard	N	
Remedial system not secured	N	
Public Welfare		
Odors/dust/debris/appearance problem	N	
Environment		
Within 500 feet of surface water, ACEC and/or wetlands	Y	
Confirmed contamination of surface water and/or wetlands	N	
Multiple sources of OHM	Y	
Multiple media affected (GW & surface water, soil & air)	Y	
Regulatory Requirements		
Remediation Waste Issues [310 CMR 40.0030]		
Failure to remove remediation waste w/in 120 days	N	
Failure to properly implement BOL process	N	
Preliminary Response Actions		
Immediate Response Actions [310 CMR 40.0411]		
Failure to notify of new release or new condition	N	
Current IRA condition not addressed	N	
Missed deadlines (Forms/Reports)	N	
Failure to comply with IRA Approval/Plan/Conditions	N	
Failure to perform Imminent Hazard Evaluation (40.0426)	N	
Failure to notify of field activities	N	
Assessment & Receptor Issues		
Risk Characterization [310 CMR 40.0900]		
Soil/groundwater category omitted or misidentified	N	
Missed receptors (private wells, wetlands, etc.)	N	
Inadequate soil/groundwater sampling	N	
Extent of contamination not defined	N	
COC/OHM not analyzed for and/or evaluated	N	
Potential migration pathway not evaluated	N	
Potential Source not identified or assessed	N	

Site Summary/Release History/Inspection Highlights/Comments:

STEPHANIE KELLY AND I CONDUCTED A SHORT NOTICE AUDIT INSPECTION AT THE CORE-MARK WAREHOUSE THIS MORNING IN RESPONSE TO INQUIRIES. THEY ARE CONDUCTING A POST-RAO RAM WITHIN AN AUL AREA TO INSTALL ADDITIONAL LOADING DOCKS TO THE EXISTING WAREHOUSE. THE OWNER SUBMITTED A RAM PLAN IN APRIL THAT PROPOSED THE REMOVAL OF UP TO 500 CY AND OFF SITE DISPOSAL OF DEWATERING IF NEEDED. THE INITIAL PLAN UNDERESTIMATED THE VOLUME OF SOIL TO BE EXCAVATED AND THE VOLUME OF GROUNDWATER TO BE DEWATERED, SO A RAM MODIFICATION WAS SUBMITTED TO INCREASE THE VOLUME OF SOIL TO 1450 CY AND CONDUCT ON SITE TREATMENT AND DISCHARGE OF THE WATER UNDER A NPDES PERMIT.

MassDEP Inspector/Signature: PAUL VIGEANT PV Date: MAY 29, 2009