

**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**

Interim Final 2/5/99

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)****Current Human Exposures Under Control**

Facility Name: Dominion Energy Brayton Point, LLC
Facility Address: 1 Brayton Point Road, Somerset, Massachusetts 02725
Facility EPA ID #: MAD055179634

1. Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, 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?

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

If no - re-evaluate existing data, or

if data are not available skip to #6 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 "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "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 "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

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).

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be “contaminated”¹ above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

| | Yes | No | ? | Rationale / Key Contaminants |
|-------------------------------|-----|----|---|---|
| Groundwater | X | | | Based on sampling – Ref. 1 / oil (LNAPL) |
| Air (indoors) ² | | X | | Based on sampling – Ref. 2 |
| Soil (surface, e.g., <2 ft) | X | | | Based on sampling – Ref. 3 /oil- TPH above Method 1 S-3 Soil Standards; metals - arsenic, nickel, vanadium, barium, beryllium, and selenium were detected in excess of DEP published background |
| Surface Water | | X | | Based on sampling – Ref. 4 |
| Sediment | | X | | Based on sampling– Ref. 5 |
| Soil (subsurface e.g., >2 ft) | | X | | Based on sampling– Ref. 3 |
| Air (outdoors) | | X | | Unlikely – Ref. 2 |

_____ If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

X If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

_____ If unknown (for any media) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

- A. Activity and Use Limitation for the No. 3 Auxiliary Diesel Generator Site (RTN 4-13687), dated August 2005
- B. Activity and Use Limitation for the No. 2 Fuel Oil Site (RTN 4-0158), dated July 1997
- C. Phase II Comprehensive Site Assessment the Ash Management Area Site (RTN 4-13169), dated September 2000
- D. Release Action Outcome (RAO) Statement for the Ash Management Area Site (RTN 4-13169) dated May 2009
- E. MADEP Comprehensive Site Assessment Approval, dated October 26, 2007
- F. MADEP Corrective Action Alternative Analysis, Dated July 3, 2008
- G. Class C-RAO Report dated November 2010 for the No. 2 Oil Release Site (RTN 4-18750)

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 appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

H. Class C-RAO Status Report, dated May 2011 for the No. 2 Oil Release Site (RTN 4-18750)

Ref 1: Groundwater

No. 3 Auxiliary Diesel Generator Site (RTN 4-13687) and No. 2 Fuel Oil Site (RTN 4-0158): These areas are permanently closed under the MCP with a RAO and AUL.

No. 2 Oil Release Site (RTN 4-18750): No analyzed constituents are currently detected in groundwater above the MCP Method 1 GW-2/GW-3 groundwater standards. Therefore, groundwater is not considered a migration pathway for the contaminants detected in soil for this area. However, LNAPL is present at depths below 15 feet below grade in well MW-711 which is installed to bedrock (*see* Figure 4A and Table 1 in Attachment A). LNAPL is not present in any other wells in this area and the oil is not migrating beyond the current location. In addition, dissolved groundwater concentrations in all other wells in this area are below applicable MCP standards (GW-2 and GW-3).

Oil-impacted groundwater is present at this area, beneath paved areas or at depths generally greater than 3 feet below unpaved areas. Current groundwater quality at areas beyond wells MW-711, do not pose unacceptable risk to plant workers or visitors. However, response actions are required because contamination is present at levels that pose potential future risk at this area, and LNAPL thickness is greater than 0.5 inch. LNAPL thicknesses have declined in wells as shown in Table 1 in Attachment A.

Phase IV remedial actions were implemented in April 2008 to remove oil from the subsurface as part of MCP activities. Since April 2008, a total of 2.4 gallons of oil have been recovered from MW-711. Oil recharge into the well has slowed since May 2008, as evidenced by diminishing product thicknesses and minimal product recovery amounts in MW-711. There was a slight increase in the amount of LNAPL recovered in January 2009, but the amount was not significant, as only 0.1 gallon of oil could be removed from the well at that time. In general, greater amounts of LNAPL were present MW-711 when the water table is low.

The Licensed Site Professional (LSP) believes that LNAPL is not mobile, and it is essentially trapped within the fractures of weathered bedrock near MW-711. The site investigations from 2004 through 2010 documented the geology and hydrogeology at the site. Numerous bedrock monitoring wells have been installed at the site, slug tests have been performed on several monitoring wells, groundwater dewatering has been done on large excavations, and product recovery has been attempted in the wells. All of the information generated from the on-site geologic and hydrogeologic investigations is consistent: there has been a small release of oil to the subsurface; the oil has been observed as a sheen in large 10 ft by 10 ft by 18 ft deep bedrock excavations; the bedrock excavations have been easily dewatered and yield little water; there was no measureable amounts of oil present in the excavations; the monitoring wells act as "sumps" and exaggerate true LNAPL thicknesses in the aquifer; and LNAPL has not been found in downgradient monitoring wells or in deep monitoring wells surrounding the release area.

Ref 2: Vapors to Indoor Air

No. 3 Auxiliary Diesel Generator Site (RTN 4-13687) and No. 2 Fuel Oil Site (RTN 4-0158): These areas are permanently closed under the MCP with a RAO and AUL.

Ash Management Area Site (RTN 4-13169): The constituents of concern are metals and do not include VOCs, which would be a concern for vapors.

No. 2 Oil Release Site (RTN 4-18750): No analyzed constituents are currently detected in groundwater above the MCP Method 1 GW-2/GW-3 groundwater standards. Therefore, potential impacts to indoor air quality are not considered a concern at this area.

Ref 3: Soil (Surface and Subsurface)

No. 3 Auxiliary Diesel Generator Site (RTN 4-13687) and No. 2 Fuel Oil Site (RTN 4-0158): These areas are permanently closed under the MCP with a RAO and AUL.

Ash Management Area Site (RTN 4-13169): Each of the COCs were detected in greater than 60 percent of the soil samples collected during the MCP Phase II investigation with the exception of antimony (29 percent), beryllium (45 percent), cadmium (3 percent), and mercury (41 percent). The majority of the COCs were detected in greater than 95 percent of the soil samples tested.

The maximum concentrations of the heavy metals detected in soil were found in the vicinity of Cell 1A and were generally detected in the oil ash layer. The exceptions to this general finding were that the maximum concentrations of cadmium, mercury, and selenium were detected in coal ash samples from the former cooling canal and the maximum concentrations of iron, manganese, and zinc were found in the wetland soil in Fox Hill Cove. (see Table 23 in Attachment B).

The concentration results of the heavy metals detected in soil samples collected at the area evaluated were compared with the DEP published background for rural and suburban soil [DEP, 1995]. The majority of the COCs were detected at concentrations less than the DEP background concentrations. Only arsenic (65 percent), nickel (51 percent), and vanadium (78 percent) were detected in excess of DEP published background in more than 50 percent of the samples tested (Table 23 in Attachment B). Barium, beryllium, and selenium concentrations in soil were detected in excess of the DEP published background concentrations in 41 percent, 44 percent, and 33 percent, respectively. All other constituents were detected in excess of DEP published background concentrations in less than 20 percent of the samples. Cadmium, lead, and zinc concentrations in soil were not detected in excess of DEP published background in any of the soil samples collected including samples of oil ash and coal ash.

Based on the frequency of detection greater than background, nickel and vanadium can be used as key indicators of oil ash contamination in soil within the area. The distribution of vanadium concentrations in soil is an indicator of oil ash. Vanadium concentrations are highest in the vicinity of Cell 1A. This distribution of vanadium in soil also corresponds to the visually identified layers of oil ash. Elevated concentrations of vanadium were also detected in soil in the vicinity of landfill Cell 9 where a former ash settling pond was also known to exist.

UCLs in soil samples were exceeded in only two soil samples, for arsenic in BP-09, and vanadium in BP-23.

No. 2 Oil Release Site (RTN 4-18750): Oil-impacted soils are present at the area of the release, beneath paved areas or at depths generally greater than 3 feet below unpaved areas. Current soil quality at areas of the release beyond wells MW-711, do not pose unacceptable risk to plant workers or visitors.

Ref 4: Surface Water

No. 3 Auxiliary Diesel Generator Site (RTN 4-13687) and No. 2 Fuel Oil Site (RTN 4-0158): These areas are permanently closed under the MCP with a RAO and AUL

Ash Management Area Site (RTN 4-13169): No surface water samples collected in support of the Ash Management Area MCP Phase II investigation exceeded AWQC for saltwater environments.

No. 2 Oil Release Site (RTN 4-18750): No surface water bodies are on the release area. The closest surface water bodies are the Taunton River and Mount Hope Bay located approximately 400 feet and 800 feet to the east and south, respectively. However, the constituents of concern detected above the applicable MCP Method 1 cleanup standards are only identified in soils in the release area and are not likely to migrate to surface water. Therefore, potential impacts to surface water quality are not considered a concern at this area.

Quarterly Toxicity Testing: As required in the Station's NPDES permit, since 2004, toxicity testing has been conducted on the cooling water and wastewater treatment system effluent that is discharged to Mount Hope Bay. The results have consistently shown no toxic effects to the species analyzed.

Ref 5: Sediments

No. 3 Auxiliary Diesel Generator Site (RTN 4-13687) and No. 2 Fuel Oil Site (RTN 4-0158): These areas are permanently closed under the MCP with a RAO and AUL.

Ash Management Area Site (RTN 4-13169): The extent of vanadium in the sediments of Fox Hill Cove (see Figures 1 and 2) is summarized in Table 34 in Attachment B. The highest concentrations of vanadium are present in the vicinity of the historical discharge point from the former ash settling ponds. Vanadium concentrations decrease radially away from this area and are comparable at the mouth of Fox Hill Cove to the concentrations measured at the reference coves³ (Table 35 in Attachment B). A similar, decreasing concentration gradient was also observed for nickel.

Vertically, the concentration of vanadium decreases rapidly. The highest concentrations of vanadium in sediments were detected immediately beneath a root mat that is 4 to 6 inches thick. Concentrations of heavy metals greater than one foot below the bottom of the root mat were comparable to those measured in the reference coves. Therefore, it appears that the root mat is preventing the migration of the impacted sediments by acting as a 'cap' and preventing the surface water⁴ and tides from washing away the sediments containing vanadium. This is supported by the decreasing concentration gradient (both horizontally and vertically) away from the discharge point. Vanadium at the mouth of Fox Hill Cove was detected at comparable concentrations to those detected at the reference coves.

In addition, MADEP approved a Comprehensive Site Assessment (CSA) in a letter dated October 26, 2007 (provided in Attachment C) and approved the Corrective Action Alternative Analysis (CAAA) in a letter dated July 3, 2008 (provided in Attachment D). Both the CSA and CAAA address sediments in Fox Hill Cove and concluded that the Cove is functioning as would be expected in the absence of any contamination and, therefore, there is no visible evidence of biological significant harm. MADEP determined the CAAA was technically complete and approved the CAAA with respect to sediments in Fox Hill Cove and approved the "No Action" alternative with a condition to conduct semi-annual surface water sampling at two locations in Fox Hill Cove which is on the Lee River.

No. 2 Oil Release Site (RTN 4-18750): No surface water bodies and associated sediment are on the location of the No. 2 Oil Release area. Therefore, potential impacts to sediment quality are not considered a concern at this area.

³ The objectives for using the reference coves were:

1. To document "background" metals concentrations in the absence of known contaminant source(s);
2. To document the abundance and diversity of ecological species in the absence of known contaminant source(s); and
3. To assess whether contaminant conditions posed a risk of harm to ecological receptors.

Reference coves were selected based upon their size, shape, and proximity to Fox Hill Cove. The conclusions of our work included that the species diversity and abundance indicated that Fox Hill Cove was functioning as would be expected in the absence of any contaminants and there was no evidence of biologically significant harm.

⁴ The surface water is the Lee River.

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

| Contaminated Media | Potential Human Receptors (Under Current Conditions) | | | | | | |
|-------------------------------|--|---------|----------|--------------|-------------|------------|-------------------|
| | Residents | Workers | Day-Care | Construction | Trespassers | Recreation | Food ⁵ |
| Groundwater | No | No | No | No | No | No | No |
| Air (indoors) | | | | | | | |
| Soil (surface, e.g., <2 ft) | No | No | No | No | No | No | No |
| Surface Water | | | | | | | |
| Sediment | | | | | | | |
| Soil (subsurface e.g., >2 ft) | | | | | | | |
| Air (outdoors) | | | | | | | |

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not “contaminated”) as identified in #2 above.
2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media – Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“___”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

 X If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

_____ If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code

Rationale and Reference(s):

⁵ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

Residents via “contaminated”:

- Groundwater = no complete pathway- Oil contamination in groundwater monitoring wells is limited to the site property and would not impact residents. See the priority resources map, shown in Figure 3 in Attachment E, displays natural resources information from the Massachusetts Geographic Information System (MassGIS). Based on this information, the site is not located in a Current of Potential Drinking Water Source Area, as defined in the MCP. There are no private drinking water wells, surface water bodies, wetlands, vernal pools, Areas of Critical Environmental Concern, Sole Source Aquifers, protected open space, or endangered species habitat located within 500 feet of the site. In addition, there are no public water supply wells, public water supplies, or interim wellhead protection areas within one mile of the Site. The Taunton River, Lee River, and Mount Hope Bay are fish habitats, located within ½ mile of the Site.
- Soil (subsurface) = no complete pathway- The only subsurface soil contamination is on-site, and no residences are on-site.

Workers via “contaminated”:

- Groundwater = no complete pathway- There are no on-site wells for production or water supply (or other opportunities for production worker contact with contaminated groundwater).
- Soil (subsurface) = no complete pathway – Workers cannot come in contact with on-site subsurface soil contamination during their normal course of work (under current conditions). For the Ash Management Area Site (RTN 4-13169), construction within contaminated soil is being conducted under a RAM Plan required by the Massachusetts Contingency Plan and under the direction of a LSP. A RAM Status Report is provided to MADEP every 6 months (April and October).

Day-Care⁶ via “contaminated”:

- Groundwater = no complete pathway- No Day Care or other non-production (e.g., schools, hospitals, commercial, etc.) uses exist near groundwater contaminated and these receptors are not expected to have other contact with contaminated groundwater.
- Soil (subsurface) = no complete pathway- No Day Care or other non-production (e.g., commercial or sensitive) uses exist in close proximity to subsurface soil contamination.

Construction (workers) via “contaminated”:

- Groundwater = no complete pathway- A Remediation Action Management (RAM) Plan will be submitted to MADEP and implemented if construction in area of contamination is planned or anticipated.
- Soil (subsurface) = no complete pathway- A Remediation Action Management (RAM) Plan will be submitted to MADEP and implemented if construction in area of contamination is planned or anticipated.

Trespassers via “contaminated”:

- Groundwater = no complete pathway- No trespassers are expected as facility has 24-hour security and well maintained fencing. Trespassers would have same pathway as “Workers”, above.
- Soil (subsurface) = no complete pathway- No trespassers are expected as facility has 24-hour security and well maintained fencing. Trespassers would have same pathway as “Workers”, above.

Recreation (users) via “contaminated”:

- Groundwater = no complete pathway - No recreational use of this property is allowed.
- Soil (subsurface) = no complete pathway- No recreational use of this property is allowed.

Food contaminated via:

⁶ Includes other non-production and possibly sensitive receptor uses (e.g., schools, hospitals, etc.)

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

4 Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**⁷ (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale and Reference(s):

⁷ If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

- Groundwater = no complete pathway- No food items are produced/grown in contact with “contaminated” groundwater.
- Soil (subsurface) = no complete pathway- No food items are produced/grown in contact with “contaminated” subsurface soil (for example no foods are produced on-site).

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

5 Can the "significant" exposures (identified in #4) be shown to be within **acceptable** limits?

_____ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

_____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s):

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Brayton Point Station facility, EPA ID # MAD055179634, located at 1 Brayton Point Road Somerset, MA under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

NO - "Current Human Exposures" are NOT "Under Control."

IN - More information is needed to make a determination.

Completed by

Meredith M. Simas

Meredith M. Simas

Dominion, Supervisor Environmental Regulation

Date

9/13/2011

RCRA Facility Manager

Marilyn St. Fleur

Marilyn St. Fleur

RCRA Facility Manager

U.S. EPA Region 1

Date

9/29/11

Locations where References may be found:

U.S. EPA Region 1 - Office of Site Remediation and Restoration Records Center'

Contact telephone and e-mail numbers:

OSSR RIC Service Desk

617-918-1440

Records-OSRR.R1@epa.gov

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

Attachment A

No. 2 Oil Release Site (RTN 4-18750)

Selected Tables and Figures from the following reports:

Class C-RAO Report for the No. 2 Oil Release Site (RTN 4-18750), dated November 2010

Class C-RAO Status Report for the No. 2 Oil Release Site (RTN 4-18750), dated May 2011

FILE: I:\E:\D04\108402_dmyan\Site Plan No Well_Somerset.dwg

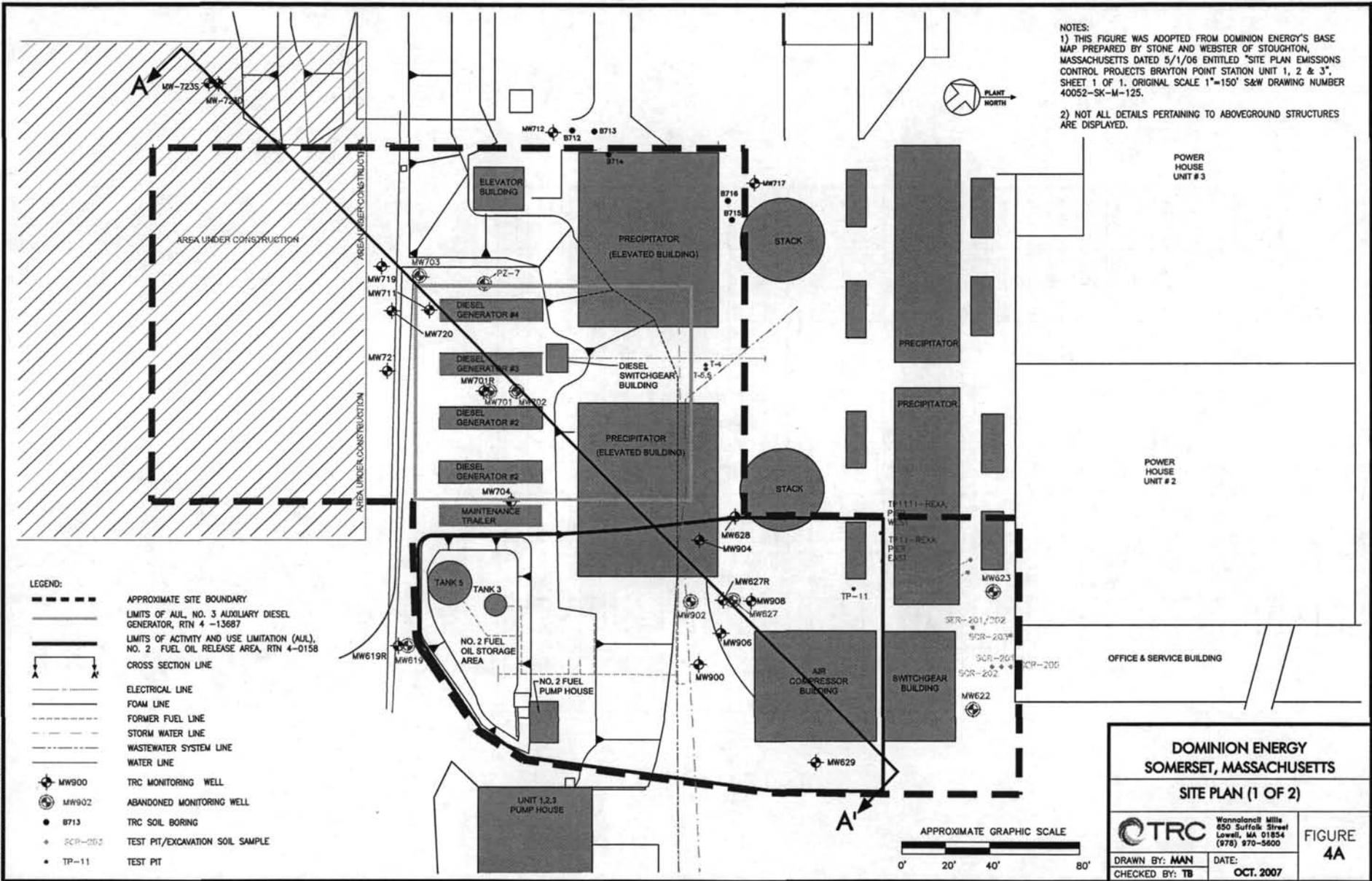


Table 1
 Water Level and Product Thickness Measurements
 Brayton Point Station
 Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-619 | | 29.49 | | | | | |
| MW-619 | 11/1/2004 | | 8.77 | -- | 20.72 | None | |
| MW-619 | 11/2/2004 | | 8.89 | -- | 20.60 | None | |
| MW-619 | 12/3/2004 | | 7.68 | -- | 21.81 | None | |
| MW-619 | 1/3/2005 | | 10.55 | -- | 18.94 | None | |
| MW-619 | 2/2/2005 | | 5.28 | -- | 24.21 | None | |
| MW-619 | 3/2/2005 | | 5.38 | -- | 24.11 | None | |
| MW-619 | 4/8/2005 | | 3.72 | -- | 25.77 | None | |
| MW-619 | 5/6/2005 | | 6.85 | -- | 22.64 | None | |
| MW-619 | 6/8/2005 | | 7.96 | -- | 21.53 | None | |
| MW-619 | 7/1/2005 | | 9.97 | -- | 19.52 | None | |
| MW-619 | 8/1/2005 | | 12.07 | -- | 17.42 | None | |
| MW-619 | 9/2/2005 | | 11.91 | -- | 17.58 | None | |
| MW-619 | 10/7/2005 | | 6.24 | -- | 23.25 | None | |
| MW-619 | 11/4/2005 | | 5.30 | -- | 24.19 | None | |
| MW-619 | 12/2/2005 | | 3.58 | -- | 25.91 | None | |
| MW-619 | 1/10/2006 | | 6.03 | -- | 23.46 | None | |
| MW-619 | 2/15/2006 | | Could not locate well | -- | -- | -- | |
| MW-619 | 3/14/2006 | | 10.13 | -- | 19.36 | None | |
| MW-619 | 4/28/2006 | | Could not locate well | -- | -- | -- | |
| MW-619 | 7/27/2006 | | 12.22 | -- | 17.27 | None | |
| MW-619 | 8/7/2006 | | 13.26 | -- | 16.23 | None | |
| MW-619R | | 29.32 | | | | | |
| MW-619R | 3/22/2007 | | 11.92 | -- | 17.40 | None | |
| MW-619R | 4/19/2007 | | 11.29 | -- | 18.03 | None | |
| MW-619R | 4/30/2007 | | na | -- | -- | -- | |
| MW-619R | 6/19/2007 | | 13.42 | -- | 15.90 | None | |
| MW-619R | 8/23/2007 | | 15.58 | -- | 13.74 | None | |
| MW-619R | 9/13/2007 | | na | -- | -- | -- | |
| MW-619R | 9/27/2007 | | 15.11 | -- | 14.21 | None | |
| MW-619R | 2/4/2008 | | Could not locate well | -- | -- | -- | |
| MW-619R | 5/2/2008 | | Could not locate well | -- | -- | -- | |
| MW-619R | 5/8/2008 | | Could not locate well | -- | -- | -- | |
| MW-619R | 5/16/2008 | | Could not locate well | -- | -- | -- | |
| MW-619R | 5/22/2008 | | 12.38 | -- | 16.94 | None | |
| MW-619R | 5/30/2008 | | 12.62 | -- | 16.70 | None | |
| MW-619R | 6/6/2008 | | -- | -- | -- | -- | |
| MW-619R | 6/13/2008 | | 13.10 | -- | 16.22 | None | |
| MW-619R | 6/20/2008 | | 13.21 | -- | 16.11 | None | |
| MW-619R | 6/26/2008 | | 13.2 | -- | 16.02 | None | |
| MW-619R | 7/14/2008 | | 13.95 | -- | 15.37 | None | |
| MW-619R | 7/25/2008 | | 14.25 | -- | 15.07 | None | |
| MW-619R | 8/8/2008 | | -- | -- | -- | -- | |
| MW-619R | 8/20/2008 | | 13.6 | -- | 15.72 | None | |
| MW-619R | 9/2/2008 | | 14.49 | -- | 14.83 | None | |
| MW-619R | 9/18/2008 | | -- | -- | -- | -- | |
| MW-619R | 11/17/2008 | | -- | -- | -- | -- | |
| MW-622 | | 14.29 | | | | | |
| MW-622 | 11/1/2004 | | 2.77 | -- | 11.52 | None | |
| MW-622 | 11/2/2004 | | 1.82 | -- | 12.47 | None | |
| MW-622 | 12/3/2004 | | 2.82 | -- | 11.47 | None | |
| MW-622 | 1/5/2005 | | -- | -- | -- | -- | |
| MW-622 | 2/2/2005 | | -- | -- | -- | -- | |
| MW-622 | 3/2/2005 | | 1.17 | -- | 13.12 | None | |
| MW-622 | 4/8/2005 | | 1.20 | -- | 13.09 | None | |
| MW-623 | | 14.41 | | | | | |
| MW-623 | 11/1/2004 | | na | -- | na | na | |
| MW-623 | 11/2/2004 | | 3.24 | -- | na | None | |
| MW-623 | 12/3/2004 | | 1.76 | -- | na | None | |
| MW-623 | 12/7/2004 | | 2.42 | -- | na | None | |

Table 1
Water Level and Product Thickness Measurements
Brayton Point Station
Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-627 | | 14.20 | | | | | |
| MW-627 | 11/1/2004 | | 1.99 | 1.77 | 12.21 | 0.22 | 12.40 |
| MW-627 | 11/2/2004 | | 1.99 | 1.76 | 12.21 | 0.23 | 12.41 |
| MW-627 | 12/3/2004 | | 1.50 | -- | 12.70 | Sheen | |
| MW-627 | 1/5/2005 | | 1.63 | 1.55 | 12.57 | 0.08 | 12.64 |
| MW-627 | 2/2/2005 | | 2.15 | 1.65 | 12.05 | 0.50 | 12.48 |
| MW-627 | 3/2/2005 | | 1.72 | 1.02 | 12.48 | 0.70 | 13.09 |
| MW-627 | 4/8/2005 | | 1.50 | 0.80 | 12.70 | 0.70 | 13.31 |
| MW-627 | 5/6/2005 | | 2.22 | 1.49 | 11.98 | 0.73 | 12.61 |
| MW-627 | 6/8/2005 | | 2.32 | 1.52 | 11.88 | 0.80 | 12.57 |
| MW-627 | 7/1/2005 | | 2.04 | 1.78 | 12.16 | 0.26 | 12.39 |
| MW-627 | 9/2/2005 | | 1.76 | 1.75 | 12.44 | 0.01 | 12.45 |
| MW-627 | 10/7/2005 | | 1.70 | 1.68 | 12.50 | 0.02 | 12.52 |
| MW-627 | 11/4/2005 | | 1.69 | 1.67 | 12.51 | 0.02 | 12.53 |
| MW-627 | 12/2/2005 | | 1.30 | 1.29 | 12.90 | 0.01 | 12.91 |
| MW-627 | 1/10/2006 | | 1.61 | 1.59 | 12.59 | 0.02 | 12.61 |
| MW-627 | 2/15/2006 | | 1.38 | -- | 12.82 | Sheen | |
| MW-627 | 3/14/2006 | | 1.63 | 1.56 | 12.57 | 0.07 | 12.63 |
| MW-627 | 4/28/2006 | | 2.32 | 1.85 | 11.88 | 0.47 | 12.29 |
| MW-627 | 11/20/2006 | | 4.75 | 4.20 | 9.45 | 0.55 | 9.93 |
| MW-627 | 12/4/2006 | | 1.38 | 1.15 | 12.82 | 0.23 | 13.02 |
| MW-627R | 3/22/2007 | 14.43 | 1.44 | -- | 12.99 | None | |
| MW-627R | 4/3/2007 | | 1.55 | -- | 12.88 | None | |
| MW-627R | 4/10/2007 | | 1.50 | -- | 12.93 | None | |
| MW-627R | 4/19/2007 | | 1.20 | -- | 13.23 | None | |
| MW-627R | 4/30/2007 | | 1.42 | -- | 13.01 | None | |
| MW-627R | 6/19/2007 | | 1.98 | -- | 12.45 | None | |
| MW-627R | 8/23/2007 | 14.21 | 1.90 | -- | 12.31 | None | |
| MW-627R | 9/13/2007 | | 1.85 | -- | 12.36 | None | |
| MW-627R | 9/27/2007 | | 1.44 | -- | 12.77 | None | |
| MW-627R | 2/4/2008 | | 1.11 | -- | 13.10 | Sheen | |
| MW-627R | 4/17/2008 | | 1.59 | -- | 12.62 | None | |
| MW-627R | 4/24/2008 | | 1.70 | -- | 12.51 | None | |
| MW-627R | 5/2/2008 | | 1.40 | -- | 12.81 | None | |
| MW-627R | 5/8/2008 | | 1.46 | -- | 12.75 | None | |
| MW-627R | 5/16/2008 | | 1.51 | -- | 12.70 | None | |
| MW-627R | 5/22/2008 | | 1.37 | -- | 12.84 | None | |
| MW-627R | 5/30/2008 | | 1.68 | -- | 12.53 | None | |
| MW-627R | 6/6/2008 | | 1.67 | -- | 12.54 | None | |
| MW-627R | 6/13/2008 | | -- | -- | -- | -- | |
| MW-627R | 6/20/2008 | | -- | -- | -- | -- | |
| MW-627R | 6/26/2008 | | 1.59 | -- | 12.62 | None | |
| MW-627R | 7/14/2008 | | -- | -- | -- | None | |
| MW-627R | 7/25/2008 | | 1.25 | -- | 12.96 | None | |
| MW-627R | 8/8/2008 | | -- | -- | -- | -- | |
| MW-627R | 8/20/2008 | | 1.68 | -- | 12.53 | None | |
| MW-627R | 9/3/2008 | | 3.76 | -- | 10.45 | None | |
| MW-627R | 9/18/2008 | | 3.16 | -- | 11.05 | None | |
| MW-627R | 11/17/2008 | | 1.37 | -- | 12.84 | None | |
| MW-627R | 12/12/2008 | | 0.65 | -- | 13.56 | None | |
| MW-627R | 1/14/2009 | | 1.15 | -- | 13.06 | None | |
| MW-627R | 1/29/2009 | 14.27 | | | | | |
| MW-627R | 2/18/2009 | | 1.55 | -- | 12.72 | None | |
| MW-627R | 3/19/2009 | | 1.5 | -- | 12.77 | None | |
| MW-627R | 12/1/2009 | | 0.99 | -- | 13.28 | None | |
| MW-627R | 1/19/2010 | | 1.26 | -- | 13.01 | None | |
| MW-627R | 3/22/2010 | | 1.35 | -- | 12.92 | None | |
| MW-627R | 6/25/2010 | | 1.58 | -- | 12.69 | None | |
| MW-627R | 1/4/2011 | | 0.83 | -- | 13.44 | None | |
| MW-627R | 3/2/2011 | | 1.23 | -- | 13.04 | None | |

Table 1
 Water Level and Product Thickness Measurements
 Brayton Point Station
 Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-628 | | 14.35 | | | | | |
| MW-628 | 1/1/2004 | | 1.92 | -- | 12.43 | None | |
| MW-628 | 1/12/2004 | | 1.95 | -- | 12.40 | None | |
| MW-628 | 12/3/2004 | | 1.55 | -- | 12.80 | None | |
| MW-628 | 1/5/2005 | | 1.54 | -- | 12.81 | None | |
| MW-628 | 2/2/2005 | | 1.87 | -- | 12.48 | None | |
| MW-628 | 3/2/2005 | | 0.95 | -- | 13.40 | None | |
| MW-628 | 3/14/2005 | | 0.88 | -- | 13.47 | None | |
| MW-628 | 3/15/2005 | | 1.25 | -- | 13.10 | None | |
| MW-628 | 3/22/2005 | | 1.90 | -- | 12.45 | None | |
| MW-628 | 3/30/2005 | | 1.00 | -- | 13.35 | None | |
| MW-628 | 4/8/2005 | | 0.90 | -- | 13.45 | None | |
| MW-628 | 5/6/2005 | | 1.63 | -- | 12.72 | None | |
| MW-628 | 6/8/2005 | | 1.73 | -- | 12.62 | None | |
| MW-628 | 7/1/2005 | | 1.90 | -- | 12.45 | None | |
| MW-628 | 8/1/2005 | | 3.32 | -- | 11.03 | None | |
| MW-628 | 9/2/2005 | | 1.84 | -- | 12.51 | None | |
| MW-628 | 10/7/2005 | | 1.92 | -- | 12.43 | None | |
| MW-628 | 11/4/2005 | | 1.63 | -- | 12.72 | None | |
| MW-628 | 12/2/2005 | | 1.41 | -- | 12.94 | None | |
| MW-628 | 1/10/2006 | | 1.62 | -- | 12.73 | None | |
| MW-628 | 2/15/2006 | | 1.42 | -- | 12.93 | None | |
| MW-628 | 3/14/2006 | | 1.63 | -- | 12.72 | None | |
| MW-628 | 4/28/2006 | | 1.83 | -- | 12.52 | None | |
| MW-628 | 11/20/2006 | | 1.61 | -- | 12.74 | None | |
| MW-628 | 12/4/2006 | | 1.55 | -- | 12.80 | None | |
| MW-628 | 3/15/2007 | | 1.70 | -- | 12.65 | None | |
| MW-628 | 3/22/2007 | | 1.55 | -- | 12.80 | None | |
| MW-628 | 4/3/2007 | | 1.57 | -- | 12.78 | None | |
| MW-628 | 4/19/2007 | | 1.43 | -- | 12.92 | None | |
| MW-628 | 4/30/2007 | | 1.42 | -- | 12.93 | None | |
| MW-628 | 6/19/2007 | | 1.78 | -- | 12.57 | None | |
| MW-628 | 8/23/2007 | | 1.88 | -- | 12.47 | None | |
| MW-628 | 9/13/2007 | | 1.91 | -- | 12.44 | None | |
| MW-628 | 9/27/2007 | | 2.06 | -- | 12.29 | None | |
| MW-628 | 2/4/2008 | | 1.41 | -- | 12.94 | Sheen | |
| MW-628 | 4/17/2008 | | 1.65 | -- | 12.70 | None | |
| MW-628 | 4/24/2008 | | 1.85 | -- | 12.50 | None | |
| MW-628 | 5/2/2008 | | 1.54 | -- | 12.81 | None | |
| MW-628 | 5/8/2008 | | 1.61 | -- | 12.74 | None | |
| MW-628 | 5/16/2008 | | 1.63 | -- | 12.72 | None | |
| MW-628 | 5/22/2008 | | 1.35 | -- | 13.00 | None | |
| MW-628 | 5/30/2008 | | 1.80 | -- | 12.55 | None | |
| MW-628 | 6/6/2008 | | 1.83 | -- | 12.52 | None | |
| MW-628 | 6/13/2008 | | 1.87 | -- | 12.48 | None | |
| MW-628 | 6/20/2008 | | 1.78 | -- | 12.57 | None | |
| MW-628 | 6/26/2008 | | 1.65 | -- | 12.70 | None | |
| MW-628 | 7/14/2008 | | 1.87 | -- | 12.48 | None | |
| MW-628 | 7/25/2008 | | 1.70 | -- | 12.65 | None | |
| MW-628 | 8/8/2008 | | 1.62 | -- | 12.73 | None | |
| MW-628 | 8/20/2008 | | -- | -- | -- | -- | |
| MW-628 | 9/3/2008 | | 2.03 | -- | 12.32 | None | |
| MW-628 | 9/18/2008 | | 1.49 | -- | 12.86 | None | |
| MW-628 | 11/17/2008 | | 1.61 | -- | 12.74 | None | |
| MW-628 | 12/12/2008 | | 1.48 | -- | 12.87 | None | |
| MW-628 | 1/14/2009 | | 1.19 | -- | 13.16 | None | |
| MW-628 | 2/18/2009 | | 1.48 | -- | 12.87 | None | |
| MW-628 | 3/19/2009 | | 1.57 | -- | 12.78 | None | |
| MW-628 | 12/1/2009 | | 1.33 | -- | 13.02 | None | |
| MW-628 | 1/19/2010 | | 1.25 | -- | 13.10 | None | |
| MW-628 | 3/22/2010 | | 1.48 | -- | 12.87 | None | |
| MW-628 | 6/25/2010 | | 1.71 | -- | 12.64 | None | |
| MW-628 | 1/4/2011 | | 1.21 | -- | 13.14 | None | |
| MW-628 | 3/2/2011 | | 1.22 | -- | 13.13 | None | |

Table 1
 Water Level and Product Thickness Measurements
 Brayton Point Station
 Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-629 | | 14.08 | | | | | |
| MW-629 | 11/1/2004 | | 3.53 | 3.47 | 10.55 | 0.06 | 10.60 |
| MW-629 | 11/2/2004 | | 3.58 | 3.53 | 10.50 | 0.05 | 10.54 |
| MW-629 | 12/3/2004 | | 2.95 | -- | 11.13 | None | |
| MW-629 | 1/5/2005 | | 3.06 | -- | 11.02 | None | |
| MW-629 | 2/2/2005 | | 3.30 | -- | 10.78 | None | |
| MW-629 | 3/2/2005 | | 2.98 | -- | 11.10 | None | |
| MW-629 | 4/8/2005 | | 2.85 | -- | 11.23 | None | |
| MW-629 | 5/6/2005 | | 3.22 | -- | 10.86 | None | |
| MW-629 | 6/8/2005 | | 3.49 | -- | 10.59 | None | |
| MW-629 | 7/1/2005 | | 3.73 | -- | 10.35 | None | |
| MW-629 | 8/1/2005 | | 4.45 | -- | 9.63 | None | |
| MW-629 | 9/2/2005 | | 4.20 | -- | 9.88 | None | |
| MW-629 | 10/7/2005 | | 5.14 | -- | 8.94 | None | |
| MW-629 | 11/4/2005 | | 3.46 | -- | 10.62 | None | |
| MW-629 | 12/2/2005 | | 3.12 | -- | 10.96 | None | |
| MW-629 | 1/10/2006 | | 3.71 | -- | 10.37 | None | |
| MW-629 | 2/15/2006 | | 3.52 | -- | 10.56 | None | |
| MW-629 | 3/14/2006 | | 3.33 | -- | 10.75 | None | |
| MW-629 | 4/28/2006 | | 3.88 | -- | 10.20 | None | |
| MW-629 | 11/20/2006 | | 3.40 | -- | 10.68 | None | |
| MW-629 | 12/4/2006 | | 3.49 | -- | 10.59 | None | |
| MW-629 | 3/15/2007 | | 4.51 | -- | 9.57 | None | |
| MW-629 | 3/22/2007 | | 3.28 | -- | 10.80 | None | |
| MW-629 | 4/3/2007 | | 3.32 | -- | 10.76 | None | |
| MW-629 | 4/19/2007 | | 5.21 | -- | 8.87 | None | |
| MW-629 | 4/30/2007 | | 2.93 | -- | 11.15 | None | |
| MW-629 | 6/19/2007 | | 3.78 | -- | 10.30 | None | |
| MW-629 | 8/23/2007 | | 4.12 | -- | 9.96 | None | |
| MW-629 | 9/13/2007 | | 4.12 | -- | 9.96 | None | |
| MW-629 | 9/27/2007 | | 4.33 | -- | 9.75 | None | |
| MW-629 | 2/4/2008 | | 3.11 | -- | 10.97 | None | |
| MW-629 | 4/17/2008 | | 3.42 | -- | 10.66 | None | |
| MW-629 | 4/24/2008 | | 3.54 | -- | 10.54 | None | |
| MW-629 | 5/2/2008 | | 3.40 | -- | 10.68 | None | |
| MW-629 | 5/8/2008 | | 3.36 | -- | 10.72 | None | |
| MW-629 | 5/16/2008 | | 3.49 | -- | 10.59 | None | |
| MW-629 | 5/22/2008 | | 3.41 | -- | 10.67 | None | |
| MW-629 | 5/30/2008 | | 3.56 | -- | 10.52 | None | |
| MW-629 | 6/6/2008 | | 3.72 | -- | 10.36 | None | |
| MW-629 | 6/13/2008 | | 3.76 | -- | 10.32 | None | |
| MW-629 | 6/20/2008 | | 3.73 | -- | 10.35 | None | |
| MW-629 | 6/26/2008 | | 3.63 | -- | 10.45 | None | |
| MW-629 | 7/14/2008 | | 3.91 | -- | 10.17 | None | |
| MW-629 | 7/25/2008 | | 4.08 | -- | 10.00 | None | |
| MW-629 | 8/8/2008 | | 3.45 | -- | 10.63 | None | |
| MW-629 | 8/20/2008 | | 3.57 | -- | 10.51 | None | |
| MW-629 | 9/5/2008 | | 3.76 | -- | 10.32 | None | |
| MW-629 | 9/18/2008 | | 3.16 | -- | 10.92 | None | |
| MW-629 | 11/17/2008 | | 3.58 | -- | 10.50 | None | |
| MW-629 | 12/12/2008 | | 3.35 | -- | 10.73 | None | |
| MW-629 | 1/14/2009 | | 2.73 | -- | 11.35 | None | |
| MW-629 | 1/29/2009 | 14.08 | | | | | |
| MW-629 | 2/18/2009 | | 2.98 | -- | 11.10 | None | |
| MW-629 | 3/19/2009 | | 3.04 | -- | 11.04 | None | |
| MW-629 | 1/19/2010 | | 3.27 | -- | 10.81 | None | |
| MW-629 | 3/22/2010 | | 4.02 | -- | 10.06 | None | |
| MW-629 | 6/25/2010 | | 4.34 | -- | 9.74 | None | |
| MW-629 | 1/4/2011 | | 3.68 | -- | 10.40 | None | |
| MW-629 | 3/2/2011 | | 3.50 | -- | 10.58 | None | |

Table 1
 Water Level and Product Thickness Measurements
 Brayton Point Station
 Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted CW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-701 | | 29.75 | | | | | |
| MW-701 | 11/2/2004 | | 11.43 | 6.89 | 18.32 | 4.54 | 22.25 |
| MW-701 | 11/3/2004 | | 11.32 | 6.00 | 18.43 | 5.32 | 23.04 |
| MW-701 | 11/4/2004 | | na | na | na | na | |
| MW-701 | 11/5/2004 | | 11.25 | 5.25 | 18.50 | 6.00 | 23.70 |
| MW-701 | 11/6/2004 | | 7.20 | 5.30 | 22.55 | 1.90 | 24.20 |
| MW-701 | 11/7/2004 | | 7.22 | 5.32 | 22.53 | 1.90 | 24.18 |
| MW-701 | 11/8/2004 | | 7.34 | 5.38 | 22.41 | 1.96 | 24.11 |
| MW-701 | 11/9/2004 | | 6.10 | 5.73 | 23.65 | 0.37 | 23.97 |
| MW-701 | 11/10/2004 | | 6.10 | 5.72 | 23.65 | 0.38 | 23.98 |
| MW-701 | 11/11/2004 | | 7.55 | 7.41 | 22.20 | 0.14 | 22.32 |
| MW-701 | 11/12/2004 | | 5.96 | 5.81 | 23.79 | 0.15 | 23.92 |
| MW-701 | 11/15/2004 | | 5.70 | 5.54 | 24.05 | 0.16 | 24.19 |
| MW-701 | 11/16/2004 | | 5.52 | 5.37 | 24.23 | 0.15 | 24.36 |
| MW-701 | 11/17/2004 | | 5.49 | 5.35 | 24.26 | 0.14 | 24.38 |
| MW-701 | 11/18/2004 | | 5.51 | 5.38 | 24.24 | 0.13 | 24.35 |
| MW-701 | 11/19/2004 | | 5.38 | 5.37 | 24.37 | 0.01 | 24.38 |
| MW-701 | 11/22/2004 | | 5.38 | -- | 24.37 | None | |
| MW-701 | 11/23/2004 | | 5.41 | -- | 24.34 | None | |
| MW-701 | 11/24/2004 | | 5.36 | -- | 24.39 | None | |
| MW-701 | 11/29/2004 | | 5.20 | -- | 24.55 | None | |
| MW-701 | 12/3/2004 | | 4.50 | -- | 25.25 | 0.00 | 25.25 |
| MW-701 | 12/7/2004 | | 4.72 | -- | 25.03 | None | |
| MW-701 | 12/9/2004 | | na | -- | na | na | |
| MW-701 | 1/5/2005 | | 4.47 | -- | 25.28 | None | |
| MW-701 | 2/2/2005 | | 4.79 | -- | 24.96 | None | |
| MW-701 | 3/2/2005 | | 4.65 | -- | 25.10 | None | |
| MW-701 | 3/15/2005 | | 4.21 | -- | 25.54 | None | |
| MW-701 | 3/22/2005 | | 4.43 | -- | 25.32 | None | |
| MW-701 | 3/30/2005 | | 5.35 | 4.61 | 24.40 | 0.74 | 25.04 |
| MW-701 | 4/8/2005 | | 4.54 | 3.74 | 25.21 | 0.80 | 25.90 |
| MW-701 | 5/6/2005 | | 5.43 | 4.64 | 24.32 | 0.79 | 25.00 |
| MW-701 | 6/8/2005 | | -5.58 | 4.82 | 24.17 | 0.76 | 24.83 |
| MW-701 | 7/1/2005 | | 6.37 | 5.89 | 23.38 | 0.48 | 23.80 |
| MW-701 | 8/1/2005 | | 8.49 | 7.54 | 21.26 | 0.95 | 22.08 |
| MW-701 | 9/2/2005 | | 9.60 | 9.38 | 20.15 | 0.22 | 20.34 |
| MW-701 | 10/7/2005 | | 7.47 | 6.72 | 22.28 | 0.75 | 22.93 |
| MW-701 | 11/4/2005 | | na | na | na | na | |
| MW-701 | 12/2/2005 | | 5.16 | 4.88 | 24.59 | 0.28 | 24.83 |
| MW-701 | 1/10/2006 | | 5.47 | 5.19 | 24.28 | 0.28 | 24.52 |
| MW-701 | 2/15/2006 | | 6.16 | 5.87 | 23.59 | 0.29 | 23.84 |
| MW-701 | 3/14/2006 | | 7.14 | -- | 22.61 | -- | -- |
| MW-701 | 4/28/2006 | | 9.12 | 8.90 | 20.63 | 0.22 | 20.82 |

Table 1
Water Level and Product Thickness Measurements
Brayton Point Station
Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-701R | 3/22/2007 | 30.09 | 6.21 | shoen | 23.88 | 0.01 | 23.89 |
| MW-701R | 4/3/2007 | | 7.59 | -- | 22.50 | None | |
| MW-701R | 4/13/2007 | | 6.37 | -- | 23.72 | None | |
| MW-701R | 4/19/2007 | | 6.23 | -- | 23.86 | None | |
| MW-701R | 4/30/2007 | | 6.58 | -- | 23.51 | None | |
| MW-701R | 6/19/2007 | | 10.34 | -- | 19.75 | None | |
| MW-701R | 8/23/2007 | | 10.95 | -- | 19.14 | None | |
| MW-701R | 9/13/2007 | | 9.51 | -- | 20.58 | None | |
| MW-701R | 9/27/2007 | | 11.57 | -- | 18.52 | None | |
| MW-701R | 2/4/2008 | | 7.99 | -- | 22.10 | None | |
| MW-701R | 4/17/2008 | | 8.55 | -- | 21.54 | None | |
| MW-701R | 4/24/2008 | | 9.31 | -- | 20.78 | None | |
| MW-701R | 5/2/2008 | | 7.75 | -- | 22.34 | None | |
| MW-701R | 5/8/2008 | | 8.40 | -- | 21.69 | None | |
| MW-701R | 5/16/2008 | | 8.52 | -- | 21.57 | None | |
| MW-701R | 5/22/2008 | | 7.51 | -- | 22.58 | None | |
| MW-701R | 5/30/2008 | | 8.98 | -- | 21.11 | None | |
| MW-701R | 6/6/2008 | | 9.71 | -- | 20.38 | None | |
| MW-701R | 6/13/2008 | | 10.13 | -- | 19.96 | None | |
| MW-701R | 6/20/2008 | | 8.90 | -- | 21.19 | None | |
| MW-701R | 6/26/2008 | | 8.42 | -- | 21.67 | None | |
| MW-701R | 7/14/2008 | | 10.98 | -- | 19.11 | None | |
| MW-701R | 7/25/2008 | | 7.73 | -- | 22.36 | None | |
| MW-701R | 8/8/2008 | | 7.85 | -- | 22.24 | None | |
| MW-701R | 8/20/2008 | | 9.25 | -- | 20.84 | None | |
| MW-701R | 9/3/2008 | | 11.45 | -- | 18.64 | None | |
| MW-701R | 9/18/2008 | | 7.63 | -- | 22.46 | None | |
| MW-701R | 11/17/2008 | | 9.52 | -- | 20.57 | None | |
| MW-701R | 12/12/2008 | | 6.96 | -- | 23.13 | None | |
| MW-701R | 1/14/2009 | | 6.61 | -- | 23.48 | None | |
| MW-701R | 1/29/2009 | 30.1 | | | | | |
| MW-701R | 3/19/2009 | | 7.13 | -- | 22.97 | None | |
| MW-701R | 4/16/2009 | | 6.61 | -- | 23.49 | None | |
| MW-701R | 5/29/2009 | | 7.63 | -- | 22.47 | None | |
| MW-701R | 9/10/2009 | | 8.31 | -- | 21.79 | None | |
| MW-701R | 12/1/2009 | | 7.16 | -- | 22.94 | None | |
| MW-701R | 1/19/2010 | | 7.44 | -- | 22.66 | None | |
| MW-701R | 3/22/2010 | | 6.55 | -- | 23.55 | None | |
| MW-701R | 6/25/2010 | | 7.49 | -- | 22.61 | None | |
| MW-701R | 1/4/2011 | | 8.21 | -- | 21.89 | None | |
| MW-701R | 3/2/2011 | | na | -- | na | na | |
| MW-702 | | 29.78 | | | | | |
| MW-702 | 11/2/2004 | | 1.60 | -- | 28.18 | None | |
| MW-702 | 1/5/2005 | | 1.75 | -- | 28.03 | None | |
| MW-702 | 2/2/2005 | | na | -- | na | na | |
| MW-702 | 3/2/2005 | | 1.81 | -- | 27.97 | None | |
| MW-702 | 4/8/2005 | | 1.10 | -- | 28.68 | None | |
| MW-702 | 5/6/2005 | | 1.29 | -- | 28.49 | None | |
| MW-702 | 6/8/2005 | | 1.38 | -- | 28.40 | None | |
| MW-702 | 7/1/2005 | | 1.75 | -- | 28.03 | None | |
| MW-702 | 8/1/2005 | | 2.50 | -- | 27.28 | None | |
| MW-702 | 9/2/2005 | | 1.29 | -- | 28.49 | None | |
| MW-702 | 10/7/2005 | | 1.45 | -- | 28.33 | None | |
| MW-702 | 11/4/2005 | | 1.23 | -- | 28.55 | None | |
| MW-702 | 12/2/2005 | | 0.84 | -- | 28.94 | None | |
| MW-702 | 1/10/2006 | | 1.18 | -- | 28.60 | None | |
| MW-702 | 2/15/2006 | | 1.07 | -- | 28.71 | None | |
| MW-702 | 3/14/2006 | | 1.49 | -- | 28.29 | None | |
| MW-702 | 4/28/2006 | | 1.59 | -- | 28.19 | None | |
| MW-703 | | 29.93 | | | | | |
| MW-703 | 11/2/2004 | | 12.54 | -- | 17.39 | None | |
| MW-703 | 12/3/2004 | | 10.55 | -- | 19.38 | None | |
| MW-703 | 1/5/2005 | | 10.51 | -- | 19.42 | None | |
| MW-703 | 2/2/2005 | | 10.78 | -- | 19.15 | None | |
| MW-703 | 3/2/2005 | | 10.62 | -- | 19.31 | None | |
| MW-703 | 4/8/2005 | | 10.12 | -- | 19.81 | None | |
| MW-703 | 5/6/2005 | | 10.67 | -- | 19.26 | None | |
| MW-703 | 6/8/2005 | | 11.11 | -- | 18.82 | None | |
| MW-703 | 7/1/2005 | | 12.12 | -- | 17.81 | None | |
| MW-703 | 8/1/2005 | | 13.82 | -- | 16.11 | None | |
| MW-703 | 9/3/2005 | | na | -- | na | na | |
| MW-703 | 10/7/2005 | | 12.18 | -- | 17.75 | None | |
| MW-703 | 11/4/2005 | | 10.79 | -- | 19.14 | None | |
| MW-703 | 12/2/2005 | | 10.65 | -- | 19.28 | None | |
| MW-703 | 1/10/2006 | | 10.79 | -- | 19.14 | None | |
| MW-703 | 2/15/2006 | | 11.11 | -- | 18.82 | None | |
| MW-703 | 3/14/2006 | | 12.50 | -- | 17.43 | None | |
| MW-703 | 4/28/2006 | | Could not locate well | | na | Well covered by rocks | |

Table 1
 Water Level and Product Thickness Measurements
 Brayton Point Station
 Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-704 | | 30.12 | | | | | |
| MW-704 | 11/2/2004 | | 6.55 | -- | 23.57 | None | |
| MW-704 | 12/3/2004 | | 3.45 | -- | 26.67 | None | |
| MW-704 | 1/5/2005 | | na | -- | na | na | |
| MW-704 | 2/2/2005 | | na | -- | na | na | |
| MW-704 | 3/2/2005 | | 5.76 | -- | 24.36 | None | |
| MW-704 | 4/8/2005 | | 2.24 | -- | 27.88 | None | |
| MW-704 | 5/6/2005 | | 5.04 | -- | 25.08 | None | |
| MW-704 | 6/8/2005 | | 5.88 | -- | 24.24 | None | |
| MW-704 | 7/1/2005 | | 7.58 | -- | 22.54 | None | |
| MW-704 | 8/1/2005 | | 9.10 | -- | 21.02 | None | |
| MW-704 | 9/2/2005 | | 4.95 | -- | 25.17 | None | |
| MW-704 | 10/7/2005 | | 5.81 | -- | 24.31 | None | |
| MW-704 | 11/4/2005 | | 4.11 | -- | 26.01 | None | |
| MW-704 | 12/2/2005 | | 3.35 | -- | 26.77 | None | |
| MW-704 | 1/10/2006 | | 4.23 | -- | 25.89 | None | |
| MW-704 | 2/15/2006 | | 4.42 | -- | 25.70 | None | |
| MW-704 | 3/14/2006 | | 7.34 | -- | 22.78 | None | |
| MW-704 | 4/28/2006 | | 8.46 | -- | 21.66 | None | |
| MW-704 | 11/20/2006 | | 7.71 | -- | 22.41 | None | |
| MW-704 | 12/4/2006 | | 7.73 | -- | 22.39 | None | |
| MW-704 | 4/3/2007 | | 7.25 | -- | 22.87 | None | |
| MW-704 | 4/19/2007 | | 5.22 | -- | 24.90 | None | |
| MW-704 | 4/30/2007 | | 6.37 | -- | 23.75 | None | |
| MW-704 | 6/19/2007 | | 9.79 | -- | 20.33 | None | |
| MW-704 | 8/23/2007 | | 10.72 | -- | 19.40 | None | |
| MW-704 | 9/13/2007 | | na | -- | na | na | |
| MW-704 | 9/27/2007 | | 10.61 | -- | 19.51 | None | |
| MW-704 | 2/4/2008 | | 7.85 | -- | 22.27 | None | |
| MW-704 | 4/17/2008 | | 8.17 | -- | 21.95 | None | |
| MW-704 | 4/24/2008 | | 8.89 | -- | 21.23 | None | |
| MW-704 | 5/2/2008 | | 8.12 | -- | 22.00 | None | |
| MW-704 | 5/8/2008 | | 8.41 | -- | 21.71 | None | |
| MW-704 | 5/16/2008 | | 8.46 | -- | 21.66 | None | |
| MW-704 | 5/22/2008 | | 8.01 | -- | 22.11 | None | |
| MW-704 | 5/30/2008 | | 8.74 | -- | 21.38 | None | |
| MW-704 | 6/6/2008 | | 9.58 | -- | 20.54 | None | |
| MW-704 | 6/13/2008 | | 9.98 | -- | 20.14 | None | |
| MW-704 | 6/20/2008 | | 10.90 | -- | 19.22 | None | |
| MW-704 | 6/26/2008 | | 9.72 | -- | 20.40 | None | |
| MW-704 | 7/14/2008 | | 10.79 | -- | 19.33 | None | |
| MW-704 | 7/25/2008 | | 9.80 | -- | 20.32 | None | |
| MW-704 | 8/8/2008 | | 8.38 | -- | 21.74 | None | |
| MW-704 | 8/20/2008 | | 9.00 | -- | 21.12 | None | |
| MW-704 | 9/3/2008 | | 10.94 | -- | 19.18 | None | |
| MW-704 | 9/18/2008 | | 7.40 | -- | 22.72 | None | |
| MW-704 | 11/17/2008 | | 9.63 | -- | 20.49 | None | |
| MW-704 | 12/12/2008 | | 8.26 | -- | 21.86 | None | |
| MW-704 | 1/14/2009 | | 6.83 | -- | 23.29 | None | |
| MW-704 | 2/18/2009 | | 8.32 | -- | 21.80 | None | |
| MW-704 | 3/19/2009 | | 7.00 | -- | 23.12 | None | |
| MW-704 | 4/16/2009 | | 6.40 | -- | 23.72 | None | |
| MW-704 | 5/29/2009 | | 7.82 | -- | 22.30 | None | |
| MW-704 | 9/10/2009 | | 8.52 | -- | 21.60 | None | |
| MW-704 | 12/1/2009 | | 7.93 | -- | 22.19 | None | |
| MW-704 | 1/19/2010 | | 8.58 | -- | 21.54 | None | |
| MW-704 | 3/22/2010 | | 6.23 | -- | 23.89 | None | |
| MW-704 | 6/25/2010 | | 8.14 | -- | 21.98 | None | |
| MW-704 | 1/4/2011 | | 9.50 | -- | 20.62 | None | |
| MW-704 | 3/2/2011 | | 6.17 | -- | 23.95 | None | |

Table 1
Water Level and Product Thickness Measurements
Brayton Point Station
Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-711 | | 29.68 | | | | | |
| MW-711 | 4/3/2007 | | 12.16 | 11.83 | 17.52 | 0.33 | 17.81 |
| MW-711 | 4/10/2007 | | 11.90 | 11.74 | 17.78 | 0.26 | 18.01 |
| MW-711 | 4/19/2007 | | 10.31 | 10.07 | 19.37 | 0.24 | 19.58 |
| MW-711 | 4/30/2007 | | 10.90 | 11.07 | 18.78 | 0.17 | 18.93 |
| MW-711 | 6/19/2007 | | 14.56 | 13.71 | 15.12 | 0.85 | 15.86 |
| MW-711 | 8/23/2007 | | 14.68 | sheen | 15.00 | sheen | 15.00 |
| MW-711 | 9/13/2007 | | 14.20 | 13.70 | 15.48 | 0.5 | 15.91 |
| MW-711 | 9/27/2007 | | 16.56 | 14.91 | 13.12 | 1.65 | 14.55 |
| MW-711 | 10/3/2007 | | 16.93 | 15.3 | 12.75 | 1.63 | 14.16 |
| MW-711 | 2/4/2008 | | 13.73 | 12.18 | 15.95 | 1.55 | 17.29 |
| MW-711 | 4/17/2008 | | 13.36 | 11.91 | 16.32 | 1.45 | 17.58 |
| MW-711 | 4/24/2008 | | 13.81 | 12.53 | 15.87 | 1.28 | 16.98 |
| MW-711 | 5/2/2008 | | 12.57 | 11.19 | 17.11 | 1.38 | 18.31 |
| MW-711 | 5/8/2008 | | 13.05 | 11.9 | 16.63 | 1.15 | 17.63 |
| MW-711 | 5/16/2008 | | 13.17 | 12.16 | 16.51 | 1.01 | 17.38 |
| MW-711 | 5/22/2008 | | 11.75 | 11.57 | 17.93 | 0.18 | 18.09 |
| MW-711 | 5/30/2008 | | 12.77 | 12.73 | 16.91 | 0.04 | 16.94 |
| MW-711 | 6/6/2008 | | 13.40 | 13.38 | 16.28 | 0.02 | 16.30 |
| MW-711 | 6/13/2008 | | 13.63 | 13.61 | 16.05 | 0.02 | 16.07 |
| MW-711 | 6/20/2008 | | 13.13 | 13.12 | 16.55 | 0.01 | 16.56 |
| MW-711 | 6/26/2008 | | 12.75 | 12.74 | 16.93 | 0.01 | 16.94 |
| MW-711 | 7/14/2008 | | 14.14 | 14.11 | 15.54 | 0.03 | 15.57 |
| MW-711 | 7/25/2008 | | 10.38 | 10.35 | 19.30 | 0.03 | 19.33 |
| MW-711 | 8/8/2008 | | 12.85 | 12.84 | 16.83 | 0.01 | 16.84 |
| MW-711 | 8/20/2008 | | 13.54 | 13.49 | 16.14 | 0.05 | 16.18 |
| MW-711 | 9/3/2008 | | 14.74 | 14.68 | 14.94 | 0.06 | 14.99 |
| MW-711 | 9/18/2008 | | 11.82 | 11.77 | 17.86 | 0.05 | 17.90 |
| MW-711 | 11/17/2008 | | 13.55 | 13.51 | 16.13 | 0.04 | 16.16 |
| MW-711 | 12/12/2008 | | 11.76 | 11.66 | 17.92 | 0.10 | 18.01 |
| MW-711 | 1/14/2009 | | 11.52 | 11.47 | 18.16 | 0.05 | 18.20 |
| MW-711 | 1/29/2009 | 29.68 | | | | | |
| MW-711 | 2/18/2009 | | 11.68 | 11.64 | 18.00 | 0.04 | 18.03 |
| MW-711 | 3/19/2009 | | 11.10 | 11.03 | 18.58 | 0.07 | 18.64 |
| MW-711 | 4/9/2009 | | 10.31 | 10.23 | 19.37 | 0.08 | 19.44 |
| MW-711 | 4/16/2009 | | 10.65 | 10.58 | 19.03 | 0.07 | 19.09 |
| MW-711 | 5/29/2009 | | 11.22 | 11.02 | 18.46 | 0.20 | 18.63 |
| MW-711 | 12/1/2009 | | 12.10 | 11.69 | 17.58 | 0.41 | 17.94 |
| MW-711 | 9/10/2009 | | 11.51 | 11.13 | 18.17 | 0.38 | 18.50 |
| MW-711 | 1/19/2010 | | 11.91 | 11.63 | 17.77 | 0.28 | 18.01 |
| MW-711 | 3/22/2010 | | 11.16 | 11.06 | 18.52 | 0.10 | 18.61 |
| MW-711 | 6/25/2010 | | 10.35 | 10.25 | 19.33 | 0.10 | 19.42 |
| MW-711 | 1/4/2011 | | 12.15 | 11.83 | 17.53 | 0.32 | 17.81 |
| MW-711 | 3/2/2011 | | 10.72 | 10.21 | 18.96 | 0.51 | 19.40 |
| MW-712 | | 16.45 | | | | | |
| MW-712 | 4/3/2007 | | 0.41 | -- | 16.04 | None | |
| MW-712 | 4/19/2007 | | 0.89 | -- | 15.56 | None | |
| MW-712 | 4/30/2007 | | 0.06 | -- | 16.39 | None | |
| MW-712 | 6/19/2007 | | 1.38 | -- | 15.07 | None | |
| MW-712 | 8/23/2007 | | 2.38 | -- | 14.07 | None | |
| MW-712 | 9/13/2007 | | na | -- | na | na | |
| MW-712 | 9/27/2007 | | 2.39 | -- | 14.06 | None | |
| MW-712 | 2/4/2008 | | 0.94 | -- | 15.51 | None | |
| MW-712 | 4/17/2008 | | 0.80 | -- | 15.65 | None | |
| MW-712 | 4/24/2008 | | 0.94 | -- | 15.51 | None | |
| MW-712 | 5/2/2008 | | 0.73 | -- | 15.72 | None | |
| MW-712 | 5/8/2008 | | 0.59 | -- | 15.86 | None | |
| MW-712 | 5/16/2008 | | 0.88 | -- | 15.57 | None | |
| MW-712 | 5/22/2008 | | 0.55 | -- | 15.90 | None | |
| MW-712 | 5/30/2008 | | 1.16 | -- | 15.29 | None | |
| MW-712 | 6/6/2008 | | 1.13 | -- | 15.32 | None | |
| MW-712 | 6/13/2008 | | 1.41 | -- | 15.04 | None | |
| MW-712 | 6/20/2008 | | 1.36 | -- | 15.09 | None | |
| MW-712 | 6/26/2008 | | 1.13 | -- | 15.32 | None | |
| MW-712 | 7/14/2008 | | 1.79 | -- | 14.66 | None | |
| MW-712 | 7/25/2008 | | 1.04 | -- | 15.41 | None | |
| MW-712 | 8/8/2008 | | 0.95 | -- | 15.50 | None | |
| MW-712 | 8/20/2008 | | 1.57 | -- | 14.88 | None | |
| MW-712 | 9/3/2008 | | 2.04 | -- | 14.41 | None | |
| MW-712 | 9/18/2008 | | 0.84 | -- | 15.61 | None | |
| MW-712 | 11/17/2008 | | 1.05 | -- | 15.40 | None | |
| MW-712 | 12/12/2008 | | 0.60 | -- | 15.85 | None | |
| MW-712 | 1/14/2009 | | 0.30 | -- | 16.15 | None | |
| MW-712 | 1/29/2009 | 16.45 | | | | | |
| MW-712 | 2/18/2009 | | 0.78 | -- | 15.67 | None | |
| MW-712 | 3/19/2009 | | 0.21 | -- | 16.24 | None | |
| MW-712 | 4/16/2009 | | 0.09 | -- | 16.36 | None | |
| MW-712 | 5/29/2009 | | 0.50 | -- | 15.95 | None | |
| MW-712 | 9/10/2009 | | 0.20 | -- | 16.25 | None | |
| MW-712 | 12/1/2009 | | -- | -- | -- | -- | |
| MW-712 | 1/19/2010 | | 0.18 | -- | 16.27 | None | |
| MW-712 | 3/22/2010 | | -- | -- | -- | -- | |
| MW-712 | 6/25/2010 | | -- | -- | -- | -- | |
| MW-712 | 1/4/2011 | | 0.24 | -- | 16.21 | None | |
| MW-712 | 3/2/2011 | | na | -- | na | na | |

Table 1
Water Level and Product Thickness Measurements
Brayton Point Station
Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-717 | | 14.26 | | | | | |
| MW-717 | 4/3/2007 | | 0.24 | -- | 14.02 | None | |
| MW-717 | 4/19/2007 | | 0.89 | -- | 13.37 | None | |
| MW-717 | 4/30/2007 | | 0.44 | -- | 13.82 | None | |
| MW-717 | 6/19/2007 | | 1.36 | -- | 12.90 | None | |
| MW-717 | 8/23/2007 | | 1.47 | -- | 12.79 | None | |
| MW-717 | 9/13/2007 | | na | -- | na | na | |
| MW-717 | 9/27/2007 | | 1.39 | -- | 12.87 | None | |
| MW-717 | 2/4/2008 | | 0.85 | -- | 13.41 | None | |
| MW-717 | 4/17/2008 | | 0.74 | -- | 13.52 | None | |
| MW-717 | 4/24/2008 | | 0.92 | -- | 13.34 | None | |
| MW-717 | 5/2/2008 | | 0.71 | -- | 13.55 | None | |
| MW-717 | 5/8/2008 | | 0.63 | -- | 13.63 | None | |
| MW-717 | 5/16/2008 | | 0.66 | -- | 13.60 | None | |
| MW-717 | 5/22/2008 | | 0.45 | -- | 13.81 | None | |
| MW-717 | 5/30/2008 | | 1.03 | -- | 13.23 | None | |
| MW-717 | 6/6/2008 | | 0.38 | -- | 13.88 | None | |
| MW-717 | 6/13/2008 | | 1.17 | -- | 13.09 | None | |
| MW-717 | 6/20/2008 | | 0.91 | -- | 13.35 | None | |
| MW-717 | 6/26/2008 | | 0.65 | -- | 13.61 | None | |
| MW-717 | 7/14/2008 | | 1.29 | -- | 12.97 | None | |
| MW-717 | 7/25/2008 | | 0.20 | -- | 14.06 | None | |
| MW-717 | 8/8/2008 | | 0.52 | -- | 13.74 | None | |
| MW-717 | 8/20/2008 | | 1.30 | -- | 12.96 | None | |
| MW-717 | 9/3/2008 | | 1.40 | -- | 12.86 | None | |
| MW-717 | 9/18/2008 | | 0.65 | -- | 13.61 | None | |
| MW-717 | 11/17/2008 | | 0.58 | -- | 13.68 | None | |
| MW-717 | 12/12/2008 | | 0.00 | -- | 14.26 | None | |
| MW-717 | 1/14/2009 | | 0.15 | -- | 14.11 | None | |
| MW-717 | 2/18/2009 | | 0.77 | -- | 13.49 | None | |
| MW-717 | 4/16/2009 | | 0.78 | -- | 13.48 | None | |
| MW-717 | 5/29/2009 | | 0.19 | -- | 14.07 | None | |
| MW-717 | 9/10/2009 | | nm | -- | | None | |
| MW-717 | 12/1/2009 | | 0.43 | -- | 13.83 | None | |
| MW-717 | 1/19/2010 | | 0.15 | -- | 14.11 | None | |
| MW-717 | 3/22/2010 | | 0.62 | -- | 13.64 | None | |
| MW-717 | 6/25/2010 | | 0.91 | -- | 13.35 | None | |
| MW-717 | 1/4/2011 | | 0.63 | -- | 13.63 | None | |
| MW-717 | 3/2/2011 | | 0.34 | -- | 13.92 | None | |
| MW-719 | | 29.38 | | | | | |
| MW-719 | 4/19/2007 | | 9.51 | -- | 19.87 | None | |
| MW-719 | 4/30/2007 | | 10.62 | -- | 18.76 | None | |
| MW-719 | 6/19/2007 | | 13.77 | -- | 15.61 | None | |
| MW-719 | 8/23/2007 | | 15.04 | -- | 14.34 | None | |
| MW-719 | 9/13/2007 | | na | -- | na | na | |
| MW-719 | 9/27/2007 | | 15.25 | -- | 14.13 | None | |
| MW-719 | 2/4/2008 | | 12.45 | -- | 16.93 | None | |
| MW-719 | 4/17/2008 | | 10.41 | -- | 18.97 | None | |
| MW-719 | 4/24/2008 | | 11.60 | -- | 17.78 | None | |
| MW-719 | 5/2/2008 | | 12.02 | -- | 17.36 | None | |
| MW-719 | 5/8/2008 | | 12.21 | -- | 17.17 | None | |
| MW-719 | 5/16/2008 | | 12.26 | -- | 17.12 | None | |
| MW-719 | 5/22/2008 | | 12.31 | -- | 17.07 | None | |
| MW-719 | 5/30/2008 | | 12.39 | -- | 16.99 | None | |
| MW-719 | 6/6/2008 | | 13.36 | -- | 16.02 | None | |
| MW-719 | 6/13/2008 | | 13.59 | -- | 15.79 | None | |
| MW-719 | 6/20/2008 | | 13.42 | -- | 15.96 | None | |
| MW-719 | 6/26/2008 | | 13.37 | -- | 16.01 | None | |
| MW-719 | 7/14/2008 | | 14.28 | -- | 15.10 | None | |
| MW-719 | 7/25/2008 | | 12.04 | -- | 17.34 | None | |
| MW-719 | 8/8/2008 | | 13.20 | -- | 16.18 | None | |
| MW-719 | 8/20/2008 | | 13.41 | -- | 15.97 | None | |
| MW-719 | 9/3/2008 | | 14.68 | -- | 14.70 | None | |
| MW-719 | 9/18/2008 | | 13.05 | -- | 16.33 | None | |
| MW-719 | 11/17/2008 | | 13.70 | -- | 15.68 | None | |
| MW-719 | 12/12/2008 | | 13.05 | -- | 16.33 | None | |
| MW-719 | 1/14/2009 | | 10.38 | -- | 19.00 | None | |
| MW-719 | 1/29/2009 | 29.38 | | | | | |
| MW-719 | 2/18/2009 | | 10.57 | -- | 18.81 | None | |
| MW-719 | 3/19/2009 | | 10.51 | -- | 18.87 | None | |
| MW-719 | 4/16/2009 | | 10.41 | -- | 18.97 | None | |
| MW-719 | 5/29/2009 | | 10.59 | -- | 18.79 | None | |
| MW-719 | 9/10/2009 | | 10.73 | -- | 18.65 | None | |
| MW-719 | 12/1/2009 | | 10.65 | -- | 18.73 | None | |
| MW-719 | 1/19/2010 | | 10.53 | -- | 18.85 | None | |
| MW-719 | 3/23/2010 | | 11.26 | -- | 18.12 | None | |
| MW-719 | 6/25/2010 | | 11.38 | -- | 18.00 | None | |
| MW-719 | 1/4/2011 | | 11.28 | -- | 18.10 | None | |
| MW-719 | 3/2/2011 | | 10.99 | -- | 18.39 | None | |

Table 1
Water Level and Product Thickness Measurements
Brayton Point Station
Somerset, Massachusetts

| Well Number | Date | Caslog Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-720 | | 29.69 | | | | | |
| MW-720 | 4/19/2007 | | 10.74 | 10.64 | 18.95 | 0.10 | 19.04 |
| MW-720 | 4/30/2007 | | 11.81 | 11.90 | 17.88 | 0.09 | 17.96 |
| MW-720 | 6/19/2007 | | 14.03 | 13.94 | 15.66 | 0.09 | 15.74 |
| MW-720 | 8/23/2007 | | 15.15 | Sheen | 14.54 | Sheen | 14.54 |
| MW-720 | 9/13/2007 | | 14.30 | 14.20 | 15.39 | 0.10 | 15.48 |
| MW-720 | 9/27/2007 | | 15.68 | 15.47 | 14.01 | 0.21 | 14.19 |
| MW-720 | 10/3/2007 | | 16.11 | 15.84 | 13.58 | 0.27 | 13.81 |
| MW-720 | 2/4/2008 | | 12.77 | -- | 16.92 | None | |
| MW-720 | 4/17/2008 | | 12.33 | 12.18 | 17.36 | 0.15 | 17.49 |
| MW-720 | 4/24/2008 | | 12.48 | 12.30 | 17.21 | 0.18 | 17.37 |
| MW-720 | 5/2/2008 | | 12.45 | 12.40 | 17.24 | 0.05 | 17.28 |
| MW-720 | 5/8/2008 | | 12.77 | 12.67 | 16.92 | 0.10 | 17.01 |
| MW-720 | 5/16/2008 | | 12.77 | -- | 16.92 | None | |
| MW-720 | 5/22/2008 | | 12.61 | 12.6 | 17.08 | 0.01 | 17.09 |
| MW-720 | 5/30/2008 | | 12.64 | 12.63 | 17.05 | 0.01 | 17.06 |
| MW-720 | 6/6/2008 | | 13.87 | 13.82 | 15.82 | 0.05 | 15.86 |
| MW-720 | 6/13/2008 | | 13.97 | 13.95 | 15.72 | 0.02 | 15.74 |
| MW-720 | 6/20/2008 | | 13.89 | 13.86 | 15.80 | 0.03 | 15.83 |
| MW-720 | 6/26/2008 | | 13.67 | 13.64 | 16.02 | 0.03 | 16.05 |
| MW-720 | 7/14/2008 | | 14.81 | 14.57 | 14.88 | 0.24 | 15.09 |
| MW-720 | 7/25/2008 | | 13.83 | 13.82 | 15.86 | 0.01 | 15.87 |
| MW-720 | 8/8/2008 | | 13.30 | 13.29 | 16.39 | 0.01 | 16.40 |
| MW-720 | 8/20/2008 | | 13.40 | 13.40 | 16.29 | 0.00 | 16.29 |
| MW-720 | 9/3/2008 | | 15.02 | 14.91 | 14.67 | 0.11 | 14.77 |
| MW-720 | 9/18/2008 | | 13.23 | 13.22 | 16.46 | 0.01 | 16.47 |
| MW-720 | 11/17/2008 | | 13.99 | 13.98 | 15.70 | 0.01 | 15.71 |
| MW-720 | 12/12/2008 | | 13.60 | 13.59 | 16.09 | 0.01 | 16.10 |
| MW-720 | 1/14/2009 | | 11.13 | 11.12 | 18.56 | 0.01 | 18.57 |
| MW-720 | 1/29/2009 | 29.69 | | | | | |
| MW-720 | 2/18/2009 | | 10.78 | -- | 18.91 | None | |
| MW-720 | 3/19/2009 | | 10.66 | -- | 19.03 | None | |
| MW-720 | 4/9/2009 | | 10.65 | -- | 19.04 | None | |
| MW-720 | 4/16/2009 | | 9.91 | -- | 19.78 | None | |
| MW-720 | 5/29/2009 | | 10.00 | -- | 19.69 | None | |
| MW-720 | 9/10/2009 | | 10.34 | -- | 19.35 | None | |
| MW-720 | 12/1/2009 | | 10.32 | -- | 19.37 | None | |
| MW-720 | 1/19/2010 | | 10.27 | -- | 19.42 | None | |
| MW-720 | 3/22/2010 | | 10.99 | -- | 18.70 | None | |
| MW-720 | 6/25/2010 | | 11.05 | -- | 18.64 | None | |
| MW-720 | 1/4/2011 | | 11.30 | -- | 18.39 | None | |
| MW-720 | 3/2/2011 | | 11.04 | -- | 18.65 | None | |
| | | 30.08 | | | | | |
| MW-721 | 4/19/2007 | | 8.78 | -- | 21.30 | None | |
| MW-721 | 4/30/2007 | | 8.02 | -- | 22.06 | None | |
| MW-721 | 6/19/2007 | | 9.88 | -- | 20.20 | None | |
| MW-721 | 8/23/2007 | | 11.40 | -- | 18.68 | None | |
| MW-721 | 9/13/2007 | | 10.72 | -- | 19.36 | None | |
| MW-721 | 9/27/2007 | | 12.61 | -- | 17.47 | None | |
| MW-721 | 2/4/2008 | | 10.39 | -- | 19.69 | None | |
| MW-721 | 4/17/2008 | | 10.27 | -- | 19.81 | None | |
| MW-721 | 4/24/2008 | | 10.06 | -- | 20.02 | None | |
| MW-721 | 5/2/2008 | | 9.06 | -- | 21.02 | None | |
| MW-721 | 5/8/2008 | | 9.30 | -- | 20.78 | None | |
| MW-721 | 5/16/2008 | | 9.30 | -- | 20.78 | None | |
| MW-721 | 5/22/2008 | | 7.95 | -- | 22.13 | None | |
| MW-721 | 5/30/2008 | | 9.13 | -- | 20.95 | None | |
| MW-721 | 6/6/2008 | | 10.68 | -- | 19.40 | None | |
| MW-721 | 6/13/2008 | | 11.04 | -- | 19.04 | None | |
| MW-721 | 6/20/2008 | | 9.48 | -- | 20.60 | None | |
| MW-721 | 6/26/2008 | | 9.20 | -- | 20.88 | None | |
| MW-721 | 7/14/2008 | | 11.85 | -- | 18.23 | None | |
| MW-721 | 7/25/2008 | | 7.66 | -- | 22.42 | None | |
| MW-721 | 8/8/2008 | | 8.58 | -- | 21.50 | None | |
| MW-721 | 8/20/2008 | | -- | -- | -- | -- | |
| MW-721 | 9/3/2008 | | 11.96 | -- | 18.12 | None | |
| MW-721 | 9/18/2008 | | 8.17 | -- | 21.91 | None | |
| MW-721 | 11/17/2008 | | -- | -- | -- | -- | |
| MW-721 | 12/12/2008 | | -- | -- | -- | -- | |
| MW-721R | 1/29/2009 | 29.72 | | | | | |
| MW-721R | 1/15/2009 | | 8.81 | -- | 20.91 | None | |
| MW-721R | 2/18/2009 | | 10.57 | -- | 19.15 | None | |
| MW-721R | 3/19/2009 | | 5.83 | -- | 23.89 | None | |
| MW-721R | 4/16/2009 | | 5.97 | -- | 23.75 | None | |
| MW-721R | 5/29/2009 | | 6.99 | -- | 22.73 | None | |
| MW-721R | 9/10/2009 | | 7.75 | -- | 21.97 | None | |
| MW-721R | 12/1/2009 | | 6.82 | -- | 22.90 | None | |
| MW-721R | 1/19/2010 | | 6.62 | -- | 23.10 | None | |
| MW-721R | 3/22/2010 | | 6.35 | -- | 23.37 | None | |
| MW-721R | 6/25/2010 | | 7.06 | -- | 22.66 | None | |
| MW-721R | 1/4/2011 | | 7.54 | -- | 22.18 | None | |
| MW-721R | 3/2/2011 | | 6.36 | -- | 23.36 | None | |
| MW-722S | | 41.95 | | | | | |
| MW-722S | 9/27/2007 | | 24.47 | -- | 17.48 | None | |
| MW-722S | 5/8/2008 | | 18.83 | -- | 23.12 | None | |

Table 1
 Water Level and Product Thickness Measurements
 Brayton Point Station
 Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-722D | | 42.21 | | | | | |
| MW-722D | 9/27/2007 | | 26.25 | -- | 15.96 | None | |
| MW-722D | 5/8/2008 | | 19.83 | -- | 22.38 | None | |
| MW-723S | | 32.82 | | | | | |
| MW-723S | 9/27/2007 | | 16.94 | -- | 15.88 | None | |
| MW-723S | 10/3/2007 | | 17.48 | -- | 15.34 | None | |
| MW-723S | 2/4/2008 | | 16.25 | -- | 16.57 | None | |
| MW-723S | 4/17/2008 | | 15.02 | -- | 17.80 | None | |
| MW-723S | 4/24/2008 | | 15.15 | -- | 17.67 | None | |
| MW-723S | 5/2/2008 | | 15.20 | -- | 17.62 | None | |
| MW-723S | 5/8/2008 | | 14.95 | -- | 17.87 | None | |
| MW-723S | 5/16/2008 | | 15.09 | -- | 17.73 | None | |
| MW-723S | 5/22/2008 | | 15.15 | -- | 17.67 | None | |
| MW-723S | 5/30/2008 | | 15.43 | -- | 17.39 | None | |
| MW-723S | 6/6/2008 | | 15.61 | -- | 17.21 | None | |
| MW-723S | 6/13/2008 | | -- | -- | -- | -- | |
| MW-723S | 6/20/2008 | | 15.81 | -- | 17.01 | None | |
| MW-723S | 6/26/2008 | | 15.75 | -- | 17.07 | None | |
| MW-723S | 7/14/2008 | | 16.17 | -- | 16.65 | None | |
| MW-723S | 7/25/2008 | | 16.62 | -- | 16.20 | None | |
| MW-723S | 8/8/2008 | | 16.23 | -- | 16.59 | None | |
| MW-723S | 8/20/2008 | | 16.48 | -- | 16.34 | None | |
| MW-723S | 9/3/2008 | | 16.76 | -- | 16.06 | None | |
| MW-723S | 9/18/2008 | | 16.40 | -- | 16.42 | None | |
| MW-723S | 11/17/2008 | | 15.55 | -- | 17.27 | None | |
| MW-723S | 12/12/2008 | | 15.19 | -- | 17.63 | None | |
| MW-723S | 1/14/2009 | | 14.56 | -- | 18.26 | None | |
| MW-723S | 1/29/2009 | 32.82 | | | | | |
| MW-723S | 2/18/2009 | | 14.88 | -- | 17.94 | None | |
| MW-723S | 3/19/2009 | | 14.53 | -- | 18.29 | None | |
| MW-723S | 4/16/2009 | | 14.08 | -- | 18.74 | None | |
| MW-723S | 5/29/2009 | | 13.50 | -- | 19.32 | None | |
| MW-723S | 12/1/2009 | | -- | -- | -- | -- | |
| MW-723S | 9/10/2009 | | 14.90 | -- | 17.92 | None | |
| MW-723S | 1/19/2010 | | 14.52 | -- | 18.30 | None | |
| MW-723S | 3/22/2010 | | 13.09 | -- | 19.73 | None | |
| MW-723S | 6/25/2010 | | 14.68 | -- | 18.14 | None | |
| MW-723D | | 32.91 | | | | | |
| MW-723D | 9/27/2007 | | 18.51 | -- | 14.40 | None | |
| MW-723D | 10/3/2007 | | 18.59 | -- | 14.32 | None | |
| MW-723D | 2/4/2008 | | 17.11 | -- | 15.80 | None | |
| MW-723D | 4/17/2008 | | 16.30 | -- | 16.61 | None | |
| MW-723D | 4/24/2008 | | 16.50 | -- | 16.41 | None | |
| MW-723D | 5/2/2008 | | 16.41 | -- | 16.50 | None | |
| MW-723D | 5/8/2008 | | 16.28 | -- | 16.63 | None | |
| MW-723D | 5/16/2008 | | 16.42 | -- | 16.49 | None | |
| MW-723D | 5/22/2008 | | 16.36 | -- | 16.55 | None | |
| MW-723D | 5/30/2008 | | 16.70 | -- | 16.21 | None | |
| MW-723D | 6/6/2008 | | 16.84 | -- | 16.07 | None | |
| MW-723D | 6/13/2008 | | 16.97 | -- | 15.94 | None | |
| MW-723D | 6/20/2008 | | 16.98 | -- | 15.93 | None | |
| MW-723D | 6/26/2008 | | 16.88 | -- | 16.03 | None | |
| MW-723D | 7/14/2008 | | 17.36 | -- | 15.55 | None | |
| MW-723D | 7/25/2008 | | 17.29 | -- | 15.62 | None | |
| MW-723D | 8/8/2008 | | 17.12 | -- | 15.79 | None | |
| MW-723D | 8/20/2008 | | 17.45 | -- | 15.46 | None | |
| MW-723D | 9/3/2008 | | 17.71 | -- | 15.20 | None | |
| MW-723D | 9/18/2008 | | 17.08 | -- | 15.83 | None | |
| MW-723D | 11/17/2008 | | 16.85 | -- | 16.06 | None | |
| MW-723D | 12/12/2008 | | 16.40 | -- | 16.51 | None | |
| MW-723D | 1/14/2009 | | 16.00 | -- | 16.91 | None | |
| MW-723D | 1/29/2009 | 32.91 | | | | | |
| MW-723D | 2/18/2009 | | 16.34 | -- | 16.57 | None | |
| MW-723D | 3/19/2009 | | 15.90 | -- | 17.01 | None | |
| MW-723D | 4/16/2009 | | 15.60 | -- | 17.31 | None | |
| MW-723D | 5/29/2009 | | 15.37 | -- | 17.54 | None | |
| MW-723D | 9/10/2009 | | 15.76 | -- | 17.15 | None | |
| MW-723D | 1/19/2010 | | 15.99 | -- | 16.92 | None | |
| MW-723D | 3/22/2010 | | 14.90 | -- | 18.01 | None | |
| MW-723D | 6/25/2010 | | 16.23 | -- | 16.68 | None | |

Table 1
Water Level and Product Thickness Measurements
Brayton Point Station
Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|--|------------|-------------------------|---------------------------|-------------------------|------------------------------|--------------------------|---------------------------------------|
| MW-900 | | 13.98 | | | | | |
| MW-900 | 3/2/2005 | | 0.10 | -- | 13.88 | None | |
| MW-900 | 4/8/2005 | | 0.10 | -- | 13.88 | None | |
| MW-900 | 5/6/2005 | | 0.10 | -- | 13.88 | None | |
| MW-900 | 6/8/2005 | | 0.15 | -- | 13.83 | None | |
| MW-900 | 7/1/2005 | | 0.90 | -- | 13.08 | None | Sheen |
| MW-900 | 8/1/2005 | | 1.97 | -- | 12.01 | None | |
| MW-900 | 9/2/2005 | | 0.31 | -- | 13.67 | None | |
| MW-900 | 10/7/2005 | | 0.32 | -- | 13.66 | None | |
| MW-900 | 10/14/2005 | | 0.00 | -- | 13.98 | None | |
| MW-900 | 11/4/2005 | | -0.10* | -- | 14.08 | None | |
| MW-900 | 12/2/2005 | | 0.07 | -- | 13.91 | None | |
| MW-900 | 1/10/2006 | | 0.07 | -- | 13.91 | None | |
| MW-900 | 2/15/2006 | | 0.08 | -- | 13.90 | None | |
| MW-900 | 3/14/2006 | | 0.14 | -- | 13.84 | None | |
| MW-900 | 4/28/2006 | | 0.65 | -- | 13.33 | None | |
| MW-900 | 11/20/2006 | | 0.04 | -- | 13.94 | None | |
| MW-900 | 12/4/2006 | | 0.00 | -- | 13.98 | None | |
| MW-900 | 4/3/2007 | | 0.04 | -- | 13.94 | None | |
| MW-900 | 4/19/2007 | | na | -- | na | None | |
| MW-900 | 4/30/2007 | | 0.09 | -- | 13.89 | None | |
| MW-900 | 6/19/2007 | | 1.04 | -- | 12.94 | None | |
| MW-900 | 8/23/2007 | | 1.58 | -- | 12.40 | None | |
| MW-900 | 9/13/2007 | | 0.80 | -- | 13.18 | None | |
| MW-900 | 9/27/2007 | | 1.69 | -- | 12.29 | None | |
| MW-900 | 2/4/2008 | | Well under water (puddle) | -- | na | na | |
| MW-900 | 4/17/2008 | | 0.15 | -- | 13.83 | None | |
| MW-900 | 4/24/2008 | | 0.45 | -- | 13.53 | None | |
| MW-900 | 5/2/2008 | | -- | -- | -- | None | |
| MW-900 | 5/8/2008 | | -- | -- | -- | None | |
| MW-900 | 5/16/2008 | | 0.11 | -- | 13.87 | None | |
| MW-900 | 5/22/2008 | | 0.20 | -- | 13.78 | None | |
| MW-900 | 5/30/2008 | | 0.75 | -- | 13.23 | None | |
| MW-900 | 6/6/2008 | | -- | -- | -- | None | |
| MW-900 | 6/13/2008 | | 1.08 | -- | 12.90 | None | |
| MW-900 | 6/20/2008 | | 0.84 | -- | 13.14 | None | |
| MW-900 | 6/26/2008 | | 0.70 | -- | 13.28 | None | |
| MW-900 | 7/14/2008 | | 1.58 | -- | 12.40 | None | |
| MW-900 | 7/25/2008 | | NA | -- | NA | None | |
| MW-900 | 8/8/2008 | | -- | -- | -- | None | |
| MW-900 | 8/20/2008 | | 0.97 | -- | 13.01 | None | |
| MW-900 | 9/3/2008 | | 1.58 | -- | 12.40 | None | |
| MW-900 | 9/18/2008 | | 0.20 | -- | 13.78 | None | |
| MW-900 | 11/17/2008 | | 0.10 | -- | 13.88 | None | |
| MW-900 | 12/12/2008 | | -- | -- | -- | None | |
| MW-900 | 1/14/2009 | | 0.20 | -- | 13.78 | None | |
| MW-900 | 2/18/2009 | | -0.26 | -- | 13.72 | None | |
| MW-900 | 3/19/2009 | | 0.23 | -- | 13.75 | None | |
| MW-900 | 4/16/2009 | | -- | -- | -- | None | |
| MW-900 | 5/29/2009 | | -- | -- | -- | None | |
| MW-900 | 9/10/2009 | | 0.57 | -- | 13.41 | None | |
| * - negative value indicates that groundwater table was above top of PVC riser | | | | | | | |
| MW-900 | 12/1/2009 | | 0.17 | -- | 13.81 | None | |
| MW-900 | 1/19/2010 | | -- | -- | -- | None | |
| MW-900 | 3/22/2010 | | -- | -- | -- | None | |
| MW-900 | 6/25/2010 | | 0.35 | -- | 13.63 | None | |
| MW-900 | 1/4/2011 | | na | -- | na | na | |
| MW-900 | 3/2/2011 | | na | -- | na | na | |
| MW-902 | | 14.00 | | | | | |
| MW-902 | 3/2/2005 | | 0.90 | -- | 13.10 | None | |
| MW-902 | 4/8/2005 | | 0.60 | -- | 13.40 | None | |
| MW-902 | 5/6/2005 | | 1.31 | -- | 12.69 | None | |
| MW-902 | 6/8/2005 | | 1.39 | -- | 12.61 | None | |
| MW-902 | 7/1/2005 | | 1.54 | -- | 12.46 | None | |
| MW-902 | 8/1/2005 | | 2.02 | -- | 11.98 | None | |
| MW-902 | 9/2/2005 | | 1.51 | -- | 12.49 | None | |
| MW-902 | 10/7/2005 | | 1.50 | -- | 12.50 | None | |
| MW-902 | 11/4/2005 | | 1.34 | -- | 12.66 | None | |
| MW-902 | 12/2/2005 | | 1.11 | -- | 12.89 | None | |
| MW-902 | 1/10/2006 | | 1.40 | -- | 12.60 | None | |
| MW-902 | 2/24/2006 | | 1.58 | -- | 12.42 | None | |
| MW-902 | 3/14/2006 | | 1.39 | -- | 12.61 | None | |
| MW-902 | 4/28/2006 | | 1.70 | -- | 12.30 | None | Damaged well - possible broken casing |
| MW-902 | 11/20/2006 | | -- | -- | -- | -- | Well vault completely sited in NM |
| MW-902 | 12/4/2006 | | -- | -- | -- | -- | Well vault completely sited in NM |

Table 1
 Water Level and Product Thickness Measurements
 Brayton Point Station
 Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-904 | | 14.19 | | | | | |
| MW-904 | 3/14/2005 | | 1.37 | -- | 12.82 | None | |
| MW-904 | 4/8/2005 | | 0.95 | -- | 13.24 | None | |
| MW-904 | 5/6/2005 | | 1.47 | -- | 12.72 | None | |
| MW-904 | 6/8/2005 | | 1.49 | -- | 12.70 | None | |
| MW-904 | 7/1/2005 | | 1.38 | -- | 12.81 | None | |
| MW-904 | 8/1/2005 | | 2.01 | -- | 12.18 | None | |
| MW-904 | 9/2/2005 | | 1.58 | -- | 12.61 | None | |
| MW-904 | 10/7/2005 | | 1.60 | -- | 12.59 | None | |
| MW-904 | 11/4/2005 | | 1.47 | -- | 12.72 | None | |
| MW-904 | 12/2/2005 | | 1.28 | -- | 12.91 | None | |
| MW-904 | 1/10/2006 | | 1.41 | -- | 12.78 | None | |
| MW-904 | 2/15/2006 | | 1.33 | -- | 12.86 | None | |
| MW-904 | 3/14/2006 | | 1.43 | -- | 12.76 | None | |
| MW-904 | 4/28/2006 | | 1.65 | -- | 12.54 | None | |
| MW-904 | 11/20/2006 | | 0.43 | -- | 13.76 | None | |
| MW-904 | 12/4/2006 | | 1.00 | -- | 13.19 | None | |
| MW-904 | 4/3/2007 | | 1.38 | -- | 12.81 | None | |
| MW-904 | 4/19/2007 | | 1.28 | -- | 12.91 | None | |
| MW-904 | 4/30/2007 | | 1.33 | -- | 12.86 | None | |
| MW-904 | 6/19/2007 | | 1.62 | -- | 12.57 | None | |
| MW-904 | 8/23/2007 | | 1.76 | -- | 12.43 | None | |
| MW-904 | 9/13/2007 | | 1.55 | -- | 12.64 | None | |
| MW-904 | 9/27/2007 | | 1.83 | -- | 12.36 | None | |
| MW-904 | 2/4/2008 | | 1.16 | -- | 13.03 | None | |
| MW-904 | 4/17/2008 | | 1.50 | -- | 12.69 | None | |
| MW-904 | 4/24/2008 | | 1.57 | -- | 12.62 | None | |
| MW-904 | 5/2/2008 | | 1.41 | -- | 12.78 | None | |
| MW-904 | 5/8/2008 | | 1.45 | -- | 12.74 | None | |
| MW-904 | 5/16/2008 | | 1.48 | -- | 12.71 | None | |
| MW-904 | 5/22/2008 | | 1.38 | -- | 12.81 | None | |
| MW-904 | 5/30/2008 | | 1.56 | -- | 12.63 | None | |
| MW-904 | 6/6/2008 | | 1.60 | -- | 12.59 | None | |
| MW-904 | 6/13/2008 | | 1.62 | -- | 12.57 | None | |
| MW-904 | 6/20/2008 | | 1.53 | -- | 12.66 | None | |
| MW-904 | 6/26/2008 | | 1.44 | -- | 12.75 | None | |
| MW-904 | 7/14/2008 | | 2.68 | -- | 11.51 | None | |
| MW-904 | 7/25/2008 | | 1.26 | -- | 12.93 | None | |
| MW-904 | 8/8/2008 | | 1.43 | -- | 12.76 | None | |
| MW-904 | 8/20/2008 | | 1.58 | -- | 12.61 | None | |
| MW-904 | 9/3/2008 | | 1.75 | -- | 12.44 | None | |
| MW-904 | 9/18/2008 | | 1.38 | -- | 12.81 | None | |
| MW-904 | 11/17/2008 | | 1.41 | -- | 12.78 | None | |
| MW-904 | 12/12/2008 | | 1.04 | -- | 13.15 | None | |
| MW-904 | 1/14/2009 | | 1.31 | -- | 12.88 | None | |
| MW-904 | 2/18/2009 | | 1.45 | -- | 12.74 | None | |
| MW-904 | 3/19/2009 | | 1.40 | -- | 12.79 | None | |
| MW-904 | 4/16/2009 | | 1.37 | -- | 12.82 | None | |
| MW-904 | 5/29/2009 | | 1.40 | -- | 12.79 | None | |
| MW-904 | 9/10/2009 | | 1.51 | -- | 12.68 | None | |
| MW-904 | 12/1/2009 | | 1.34 | -- | 12.85 | None | |
| MW-904 | 1/19/2010 | | 1.30 | -- | 12.89 | None | |
| MW-904 | 3/22/2010 | | 1.33 | -- | 12.86 | None | |
| MW-904 | 6/25/2010 | | 1.41 | -- | 12.78 | None | |
| MW-904 | 1/4/2011 | | 1.03 | -- | 13.16 | None | |
| MW-904 | 3/2/2011 | | 1.30 | -- | 12.89 | None | |

Table 1
 Water Level and Product Thickness Measurements
 Brayton Point Station
 Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-906 | | 14.09 | | | | | |
| MW-906 | 3/2/2005 | | 2.01 | -- | 12.08 | None | |
| MW-906 | 4/8/2005 | | 1.42 | -- | 12.67 | None | |
| MW-906 | 5/6/2005 | | 1.86 | -- | 12.23 | None | |
| MW-906 | 6/8/2005 | | 1.91 | -- | 12.18 | None | |
| MW-906 | 7/1/2005 | | 1.85 | -- | 12.24 | None | |
| MW-906 | 8/1/2005 | | 2.90 | 2.57 | 11.19 | 0.33 | 11.48 |
| MW-906 | 9/2/2005 | | 1.93 | -- | 12.16 | None | Sheen |
| MW-906 | 10/7/2005 | | 2.02 | -- | 12.07 | None | Sheen |
| MW-906 | 11/4/2005 | | 1.91 | -- | 12.18 | None | Sheen |
| MW-906 | 12/2/2005 | | 1.66 | -- | 12.43 | None | |
| MW-906 | 1/10/2006 | | 1.83 | -- | 12.26 | None | Sheen |
| MW-906 | 2/15/2006 | | 1.86 | -- | 12.23 | None | Sheen |
| MW-906 | 3/14/2006 | | 1.82 | -- | 12.27 | None | |
| MW-906 | 4/28/2006 | | 2.42 | -- | 11.67 | None | |
| MW-906 | 11/20/2006 | | 2.05 | -- | 12.04 | None | |
| MW-906 | 12/4/2006 | | 1.78 | -- | 12.31 | None | |
| MW-906 | 4/3/2007 | | 1.86 | -- | 12.23 | None | |
| MW-906 | 4/19/2007 | | 1.32 | -- | 12.77 | None | |
| MW-906 | 4/30/2007 | | 1.84 | -- | 12.25 | None | |
| MW-906 | 6/19/2007 | | 2.27 | -- | 11.82 | None | |
| MW-906 | 8/23/2007 | | 2.35 | -- | 11.74 | None | |
| MW-906 | 9/13/2007 | | 1.96 | -- | 12.13 | None | |
| MW-906 | 9/27/2007 | | 2.35 | -- | 11.74 | None | |
| MW-906 | 2/4/2008 | | 1.75 | -- | 12.34 | None | |
| MW-906 | 4/17/2008 | | 2.00 | -- | 12.09 | None | |
| MW-906 | 4/24/2008 | | 2.14 | -- | 11.95 | None | |
| MW-906 | 5/2/2008 | | 1.89 | -- | 12.20 | None | |
| MW-906 | 5/8/2008 | | 1.92 | -- | 12.17 | None | |
| MW-906 | 5/16/2008 | | 1.94 | -- | 12.15 | None | |
| MW-906 | 5/22/2008 | | 1.94 | -- | 12.15 | None | |
| MW-906 | 5/30/2008 | | 2.09 | -- | 12.00 | None | |
| MW-906 | 6/6/2008 | | 2.09 | -- | 12.00 | None | |
| MW-906 | 6/13/2008 | | 2.15 | -- | 11.94 | None | |
| MW-906 | 6/20/2008 | | 2.14 | -- | 11.95 | None | |
| MW-906 | 6/26/2008 | | 2.02 | -- | 12.07 | None | |
| MW-906 | 7/14/2008 | | 2.30 | -- | 11.79 | None | |
| MW-906 | 7/25/2008 | | 1.96 | -- | 12.13 | None | |
| MW-906 | 8/8/2008 | | 1.94 | -- | 12.15 | see notes | |
| MW-906 | 8/20/2008 | | 2.11 | -- | 11.98 | see notes | |
| MW-906 | 9/3/2008 | | 2.28 | -- | 11.81 | see notes | |
| MW-906 | 11/17/2008 | | 1.45 | -- | 12.64 | None | |
| MW-906 | 12/12/2008 | | 1.81 | -- | 12.28 | None | |
| MW-906 | 1/14/2009 | | 1.39 | -- | 12.70 | None | |
| MW-906 | 1/29/2009 | 14.10 | | | | | |
| MW-906 | 2/18/2009 | | 2.01 | -- | 12.09 | None | |
| MW-906 | 3/19/2009 | | 2.73 | -- | 11.37 | None | |
| MW-906 | 4/16/2009 | | 1.78 | -- | 12.32 | None | |
| MW-906 | 5/29/2009 | | 1.67 | -- | 12.43 | None | |
| MW-906 | 9/10/2009 | | 1.83 | -- | 12.27 | None | |
| MW-906 | 12/1/2009 | | 1.51 | -- | 12.59 | None | |
| MW-906 | 1/19/2010 | | 1.59 | -- | 12.51 | None | |
| MW-906 | 3/22/2010 | | 1.35 | -- | 12.75 | None | |
| MW-906 | 6/25/2010 | | 1.80 | -- | 12.30 | None | |
| MW-906 | 1/4/2011 | | 0.67 | -- | 13.43 | None | |
| MW-906 | 3/2/2011 | | 1.59 | -- | 12.51 | None | |

Table 1
Water Level and Product Thickness Measurements
Brayton Point Station
Somerset, Massachusetts

| Well Number | Date | Casing Elevation (NGVD) | Depth to Water (feet) | Depth to Product (feet) | Groundwater Elevation (NGVD) | Product Thickness (feet) | Adjusted GW Elevation (NGVD) |
|-------------|------------|-------------------------|-----------------------|-------------------------|------------------------------|--------------------------|------------------------------|
| MW-908 | | 14.39 | | | | | |
| MW-908 | 3/2/2005 | | 2.47 | -- | 11.92 | None | |
| MW-908 | 4/8/2005 | | 0.85 | -- | 13.54 | None | |
| MW-908 | 5/6/2005 | | 1.80 | -- | 12.59 | None | |
| MW-908 | 6/8/2005 | | 1.57 | -- | 12.82 | None | |
| MW-908 | 7/1/2005 | | 1.92 | -- | 12.47 | None | |
| MW-908 | 8/1/2005 | | 2.40 | -- | 11.99 | None | |
| MW-908 | 9/2/2005 | | 2.05 | -- | 12.34 | None | |
| MW-908 | 10/7/2005 | | 1.96 | -- | 12.43 | None | |
| MW-908 | 11/4/2005 | | 1.68 | -- | 12.71 | None | |
| MW-908 | 12/2/2005 | | 1.70 | -- | 12.69 | None | |
| MW-908 | 1/10/2006 | | 1.80 | -- | 12.59 | None | |
| MW-908 | 2/15/2006 | | 1.02 | -- | 13.37 | None | |
| MW-908 | 3/14/2006 | | 1.63 | -- | 12.76 | None | |
| MW-908 | 4/28/2006 | | 2.08 | -- | 12.31 | None | |
| MW-908 | 11/20/2006 | | 1.82 | -- | 12.57 | None | |
| MW-908 | 12/4/2006 | | 1.65 | -- | 12.74 | None | |
| MW-908 | 4/3/2007 | | 1.59 | -- | 12.80 | None | |
| MW-908 | 4/19/2007 | | 1.68 | -- | 12.71 | None | |
| MW-908 | 4/30/2007 | | 1.65 | -- | 12.74 | None | |
| MW-908 | 6/19/2007 | | 1.78 | -- | 12.61 | None | |
| MW-908 | 8/23/2007 | | 2.08 | -- | 12.31 | None | |
| MW-908 | 9/13/2007 | | 2.12 | -- | 12.27 | None | |
| MW-908 | 9/27/2007 | | 2.03 | -- | 12.36 | None | |
| MW-908 | 2/4/2008 | | 1.78 | -- | 12.61 | None | |
| MW-908 | 4/17/2008 | | 1.82 | -- | 12.57 | None | |
| MW-908 | 4/24/2008 | | 1.86 | -- | 12.53 | None | |
| MW-908 | 5/2/2008 | | 1.82 | -- | 12.57 | None | |
| MW-908 | 5/8/2008 | | 1.84 | -- | 12.55 | None | |
| MW-908 | 5/16/2008 | | 1.88 | -- | 12.51 | None | |
| MW-908 | 5/22/2008 | | 1.85 | -- | 12.54 | None | |
| MW-908 | 5/30/2008 | | 1.86 | -- | 12.53 | None | |
| MW-908 | 6/6/2008 | | 1.93 | -- | 12.46 | None | |
| MW-908 | 6/13/2008 | | 1.91 | -- | 12.48 | None | |
| MW-908 | 6/20/2008 | | 1.87 | -- | 12.52 | None | |
| MW-908 | 6/26/2008 | | 1.68 | -- | 12.71 | None | |
| MW-908 | 7/14/2008 | | 1.98 | -- | 12.41 | None | |
| MW-908 | 7/25/2008 | | 1.60 | -- | 12.79 | None | |
| MW-908 | 8/8/2008 | | 1.68 | -- | 12.71 | None | |
| MW-908 | 8/20/2008 | | 1.80 | -- | 12.59 | None | |
| MW-908 | 9/3/2008 | | 2.07 | -- | 12.32 | None | |
| MW-908 | 9/18/2008 | | 1.68 | -- | 12.71 | None | |
| MW-908 | 11/17/2008 | | 1.84 | -- | 12.55 | None | |
| MW-908 | 12/12/2008 | | 1.81 | -- | 12.58 | None | |
| MW-908 | 1/14/2009 | | 1.45 | -- | 12.94 | None | |
| MW-908 | 1/29/2009 | 14.40 | | | | None | |
| MW-908 | 2/18/2009 | | 1.71 | -- | 12.69 | None | |
| MW-908 | 3/19/2009 | | NM | -- | | None | |
| MW-908 | 4/16/2009 | | 1.55 | -- | 12.85 | None | |
| MW-908 | 5/29/2009 | | 1.70 | -- | 12.70 | None | |
| MW-908 | 9/10/2009 | | 1.88 | -- | 12.52 | None | |
| MW-908 | 12/1/2009 | | 1.45 | -- | 12.95 | None | |
| MW-908 | 1/19/2010 | | 1.46 | -- | 12.94 | None | |
| MW-908 | 3/22/2010 | | 1.43 | -- | 12.97 | None | |
| MW-908 | 6/25/2010 | | 1.76 | -- | 12.64 | None | |
| MW-908 | 1/4/2011 | | 1.68 | -- | 12.72 | None | |
| MW-908 | 3/2/2011 | | 1.20 | -- | 13.20 | None | |
| AST-703 | | 24.2 | | | | | |
| AST-703 | 8/23/2007 | | dry | -- | dry | None | |
| AST-703 | 9/13/2007 | | 22.18 | -- | 2.02 | None | |
| AST-703 | 9/27/2007 | | 21.07 | -- | 3.13 | None | |
| AST-703 | 5/8/2008 | | 21.72 | -- | 2.48 | None | |
| AST-704 | | 21.33 | | | | | |
| AST-704 | 8/23/2007 | | 20.10 | -- | 1.23 | None | |
| AST-704 | 9/13/2007 | | 19.86 | -- | 1.47 | None | |
| AST-704 | 9/27/2007 | | 19.75 | -- | 1.58 | None | |
| AST-704 | 5/8/2008 | | 18.77 | -- | 2.56 | None | |
| AST-708S | | 20.24 | | | | | |
| AST-708S | 8/23/2007 | | 17.57 | -- | 2.67 | None | |
| AST-708S | 9/13/2007 | | 17.47 | -- | 2.77 | None | |
| AST-708S | 9/27/2007 | | 17.57 | -- | 2.67 | None | |
| AST-708S | 10/3/2007 | | 17.71 | -- | 2.53 | None | |
| AST-708D | | 20.29 | | | | | |
| AST-708D | 9/13/2007 | | 17.70 | -- | 2.59 | None | |
| AST-708D | 9/27/2007 | | 17.79 | -- | 2.50 | None | |
| AST-708D | 10/3/2007 | | 17.91 | -- | 2.38 | None | |
| PZ-7 | | 30.13 | | | | | |
| PZ-7 | 6/8/2005 | | 1.85 | -- | 28.28 | None | |
| PZ-7 | 7/1/2005 | | 1.38 | -- | 28.75 | None | |
| PZ-7 | 8/1/2005 | | 5.98 | -- | 24.15 | None | |
| PZ-7 | 9/2/2005 | | 1.75 | -- | 28.38 | None | |
| PZ-7 | 10/7/2005 | | 1.91 | -- | 28.22 | None | |
| PZ-7 | 11/4/2005 | | 1.70 | -- | 28.43 | None | |
| PZ-7 | 12/2/2005 | | 1.28 | -- | 28.85 | None | |
| PZ-7 | 1/10/2006 | | 1.67 | -- | 28.46 | None | |
| PZ-7 | 2/15/2006 | | 1.56 | -- | 28.57 | None | |
| PZ-7 | 3/14/2006 | | 2.02 | -- | 28.11 | None | |
| PZ-7 | 4/28/2006 | | 2.06 | -- | 28.07 | None | |

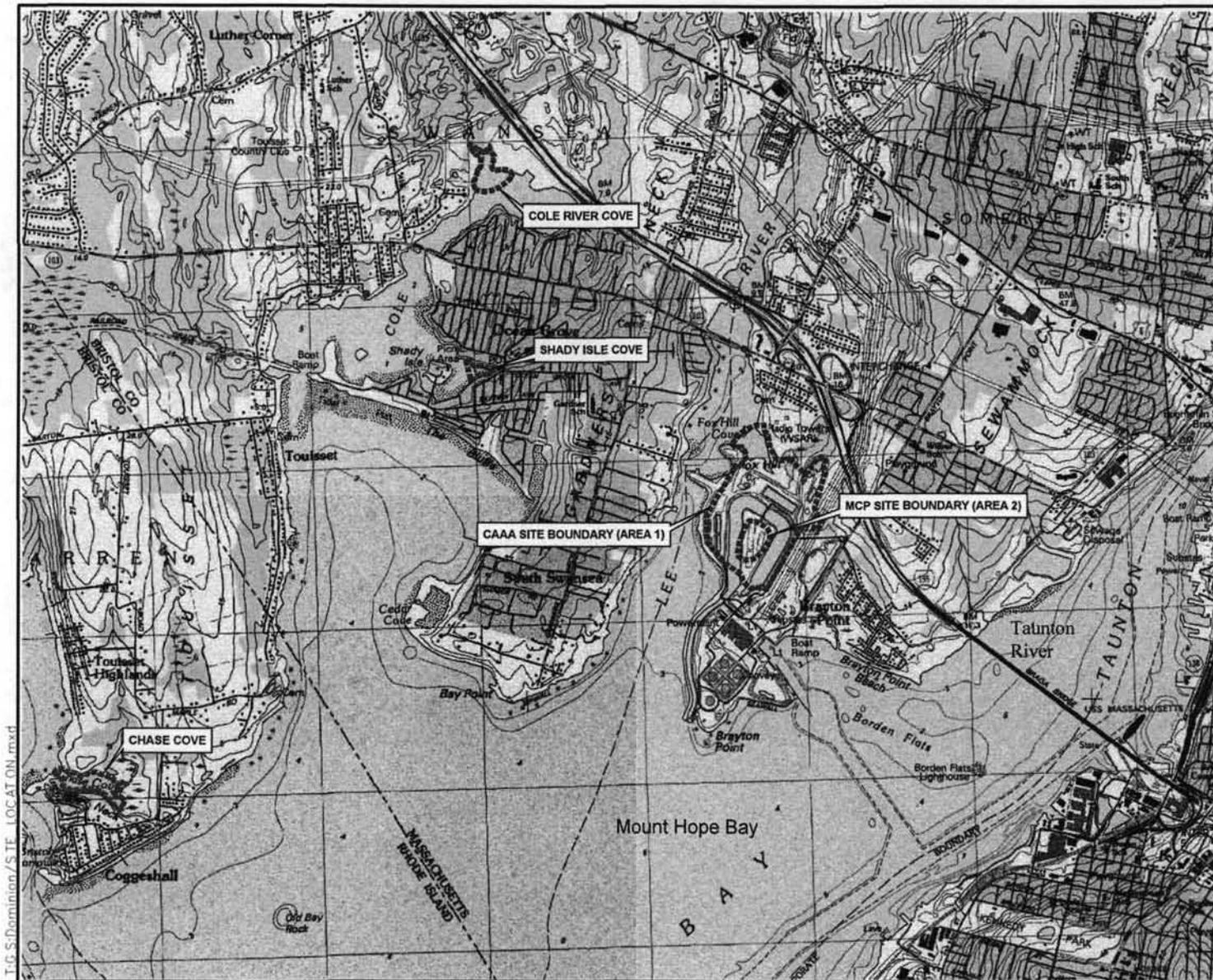
Note:
 All depths in feet below inner casing.
 Monitoring wells MW-900, MW-902, MW-906 & MW-908 installed in February 2005.
 Monitoring wells MW-619R, MW-701R, MW-711 installed in March 2007.
 Monitoring well MW-622 abandoned on April 8, 2005.
 Monitoring well MW-619, MW-701, MW-702, MW-703, and PZ-07 abandoned in September 2006.
 Monitoring well MW-619R was destroyed in
 Monitoring wells MW-732S and MW-723D abandoned in November 2010.
 NGVD based on Tibbets Engineering Corp. surveys
 -- no measurement recorded on this date.
 -- No product was detected.

Attachment B

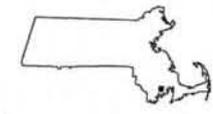
Ash Management Area Site (RTN 4-13169)

Selected Tables and Figures from the following report:

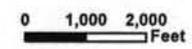
*Phase II Comprehensive Site Assessment the Ash Management Area Site (RTN 4-13169),
dated September 2000*



■ QUADRANGLE LOCATION



SOURCE:
USGS: 1995, Fall River Massachusetts
7.5 Minute Topographic Quadrangle
Contour Interval 3 Meters



SITE LOCATION MAP

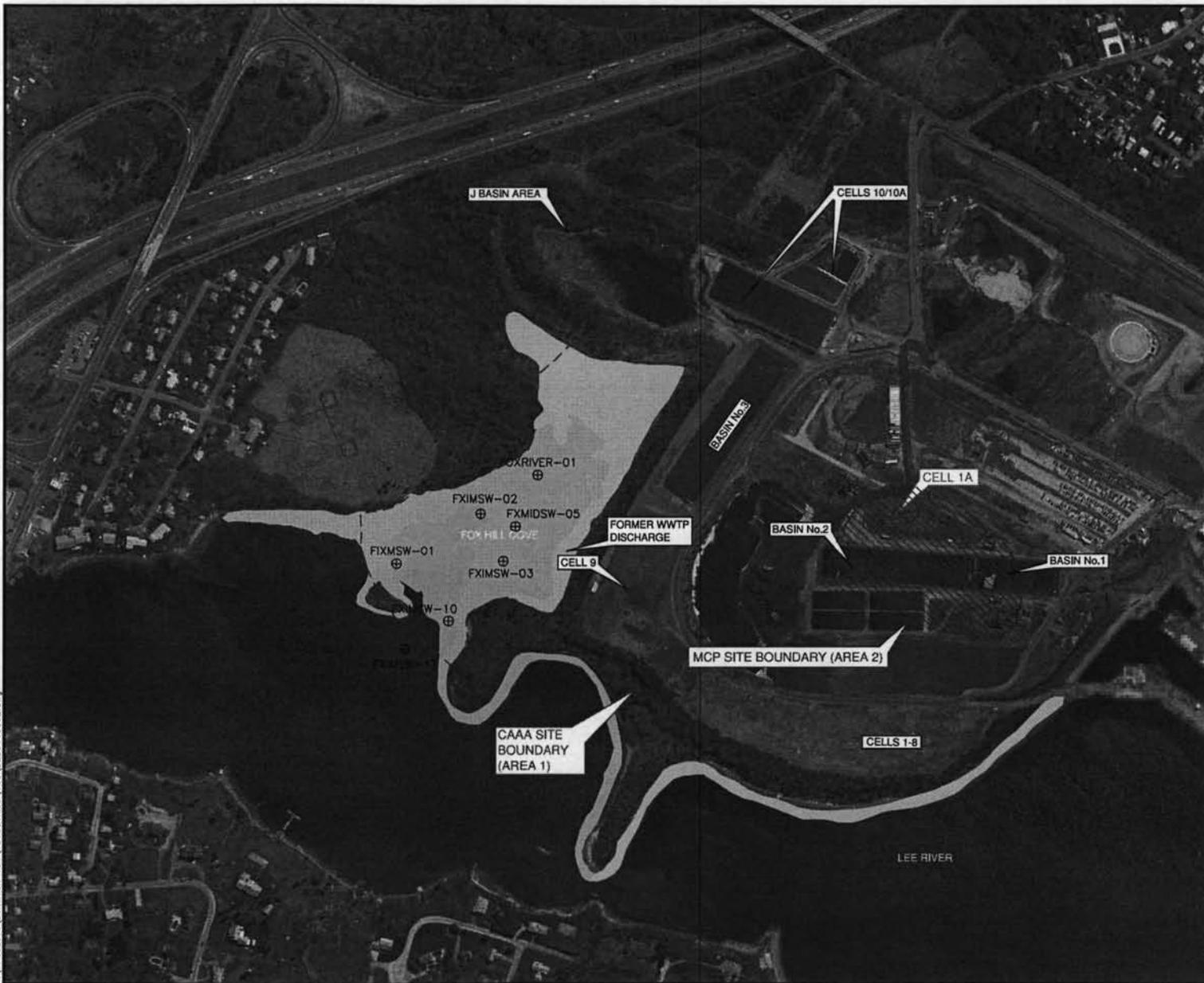
FRAYTON POINT ROAD
SOMERSET, MASSACHUSETTS

DOMINION

| | | | |
|--|--------------------------------------|--------------------------------------|---|
| | 100% POLYMER CONCRETE PRODUCTS | 100% POLYMER CONCRETE PRODUCTS | 1 |
| | 100% POLYMER CONCRETE PRODUCTS | 100% POLYMER CONCRETE PRODUCTS | |

T:\GIS\Dominion\SITE_LOCATION.mxd

NA PROJECTS\Dominion 151\151001M03\100\DEB0110002.dwg



LEGEND

- ⊕ SURFACE WATER SAMPLE LOCATION
- FRESH WATER NON-FORESTED WETLANDS
- BRACKISH MARSH
- INTER-TIDAL MUDFLATS
- INTERTIDAL SANDY BEACH

NOTE:
 CAAA SITE BOUNDARY (AREA 1) DOES NOT
 INCLUDE THE MCP SITE BOUNDARY (AREA 2)

SOURCE
 AERIAL PHOTOGRAPH RETRIEVED FROM
 MASSACHUSETTS GIS WEB SITE
<http://www.mass.gov/mgis/colororthos2005.htm>



Title: SITE PLAN AND SURFACE WATER SAMPLING LOCATIONS

BRAYTON POINT
 SOMERSET, MASSACHUSETTS

Prepared For: DOMINION

| | | | |
|---|---------------------|--------------------|-----------------|
| ROUX ASSOCIATES, INC. <i>Environmental Consulting & Management</i> | Compiled by: JV | Date: 4/14/08 | FIGURE 2 |
| | Prepared by: CRS | Scale: AS SHOWN | |
| | Project Mgr: JV | Office: MA | |
| | File No: DEB0110002 | Project: 151001M03 | |

Table 23.
Soil Samples Above DEP Background
Phase II Site Assessment
Brayton Point Station
RTN 4-13169
Somerset, Massachusetts

| Constituent | Number of Samples | Number of Samples Detected | Frequency of Samples Detected | Minimum Concentration Detected (mg/kg) | Maximum Concentration Detected (mg/kg) | Sample ID of Maximum Concentration | Location (Area) * of Maximum Concentration | DEP Background Concentration (mg/kg) | Number of Samples Detected Above DEP Background | Frequency of Samples Detected Above DEP Background |
|------------------|-------------------|----------------------------|-------------------------------|--|--|------------------------------------|--|--------------------------------------|---|--|
| Antimony, Total | 99 | 29 | 29% | 0.2 | 2 | GP-10-S4A | Cell 1A | 1.4 | 2 | 2% |
| Arsenic, Total | 294 | 287 | 98% | 1.4 | 380 | BP-09-S4 and B97006-S3 | Cell 1A | 17 | 191 | 65% |
| Barium, Total | 63 | 63 | 100% | 4.9 | 1200 | BP-09-S4 | Cell 1A | 45 | 26 | 41% |
| Beryllium, Total | 55 | 25 | 45% | 0.26 | 26 | BP-23-S6 | Cell 1A | 0.4 | 24 | 44% |
| Cadmium, Total | 63 | 2 | 3% | 0.54 | 0.63 | BP-15-S3 | Former Cooling Canal | 2 | 0 | 0% |
| Chromium, Total | 107 | 107 | 100% | 3.5 | 68.2 | GP101 | Cell 1A | 29 | 20 | 19% |
| Copper, Total | 99 | 99 | 100% | 4.8 | 106 | GP4-S3 | Cell 1A | 38 | 19 | 19% |
| Iron, Total | 55 | 55 | 100% | 4400 | 35000 | FXFWSD-08-S1 | Fox Hill Cove | 17000 | 8 | 15% |
| Lead, Total | 107 | 104 | 97% | 3.4 | 74 | B97007-S4 | Cell 1A | 99 | 0 | 0% |
| Manganese, Total | 55 | 55 | 100% | 23 | 2100 | FXFWSD-08-S1 | Fox Hill Cove | 300 | 10 | 18% |
| Mercury, Total | 63 | 26 | 41% | 0.05 | 0.53 | BP-11-S2 | Former Cooling Canal | 0.3 | 4 | 6% |
| Nickel, Total | 294 | 294 | 100% | 0.34 | 9900 | B97007-S4 | Cell 1A | 17 | 150 | 51% |
| Selenium, Total | 63 | 39 | 62% | 0.19 | 44 | BP-11-S2 | Former Cooling Canal | 0.5 | 21 | 33% |
| Vanadium, Total | 294 | 294 | 100% | 0.5 | 35500 | GP16-S3B | Cell 1A | 29 | 230 | 78% |
| Zinc, Total | 99 | 99 | 100% | 12 | 85 | FXFWSD-08-S1 | Fox Hill Cove | 116 | 0 | 0% |

Note:

* Refer to Figure 3, which shows generalized areas of the Site.

Shaded values represent frequencies of metal analyses above DEP Background concentration greater than 20%.

mg/kg = milligrams per kilogram.

Table 24.
Groundwater Samples Above GW-3 Standards
Phase II Site Assessment
Brayton Point Station
RTN 4-13169
Somerset, Massachusetts

| Constituent | Number of Samples | Number of Samples Detected | Frequency of Samples Detected | Minimum Concentration Detected (ug/L) | Maximum Concentration Detected (ug/L) | Sample ID of Maximum Concentration | Location (Area) * of Maximum Concentration | DEP GW-3 Standard (ug/L) | Number of Samples Detected Above GW-3 Standards | Frequency of Samples Detected Above GW-3 Standards |
|----------------------|-------------------|----------------------------|-------------------------------|---------------------------------------|---------------------------------------|------------------------------------|--|--------------------------|---|--|
| Antimony, Dissolved | 69 | 11 | 16% | 2.3 | 43 | BP-27 | Cell 1A | 300 | 0 | 0% |
| Arsenic, Dissolved | 69 | 41 | 59% | 2.3 | 170 | MW402S | Cells 10/10A | 400 | 0 | 0% |
| Barium, Dissolved | 69 | 38 | 55% | 8.7 | 300 | BP-13 | Former Cooling Canal | 30000 | 0 | 0% |
| Beryllium, Dissolved | 69 | 0 | 0% | NA | NA | NA | NA | 50 | 0 | 0% |
| Cadmium, Dissolved | 69 | 39 | 57% | 0.03 | 160 | BP-28 | Former Cooling Canal | 10 | 4 | 6% |
| Chromium, Dissolved | 69 | 6 | 9% | 16 | 80 | BP-06A | Cells 1-8 | 2000 | 0 | 0% |
| Copper, Dissolved | 69 | 29 | 42% | 0.5 | 6.9 | B97005 | Cell 1A | None | 0 | 0% |
| Iron, Dissolved | 69 | 56 | 81% | 5.4 | 140000 | BP-27 | Former Cooling Canal | None | 0 | 0% |
| Lead, Dissolved | 69 | 24 | 35% | 0.05 | 2.1 | BP-08B | Cells 1-8 | 30 | 0 | 0% |
| Manganese, Dissolved | 69 | 61 | 88% | 11 | 220000 | BP-27 | Former Cooling Canal | None | 0 | 0% |
| Mercury, Dissolved | 69 | 0 | 0% | NA | NA | NA | NA | 1 | 0 | 0% |
| Nickel, Dissolved | 69 | 45 | 65% | 1 | 520 | MW6 | Cells 1-8 | 80 | 8 | 12% |
| Selenium, Dissolved | 69 | 14 | 20% | 2 | 91 | BP-11 | Former Cooling Canal | 80 | 1 | 1% |
| Vanadium, Dissolved | 69 | 48 | 70% | 13 | 34000 | B97007 | Cell 1A | 2000 | 22 | 32% |
| Zinc, Dissolved | 69 | 33 | 48% | 2.8 | 97 | BP-27 | Former Cooling Canal | 900 | 0 | 0% |

Notes:

* Refer to Figure 3, which shows generalized areas of the Site.

Shaded values represent frequencies of metal analyses above DEP Background concentration greater than 20%.

ug/L = micrograms per liter.

Table 34.
Wetland Sediment Analytical Results - Fox Hill Cove
Phase II SRA Assessment
Brayton Point Station
RTN 4-13169
Somerset, Massachusetts

| Analyte | Method | Units | Cover Type: | | | Intertidal Mudflat | | | | | | | | | | | | | | | | | | | | | |
|--------------------------|----------|--------|-----------------------------|------|-------------------------|--------------------|---|---------------|----|--------------------|----|---------------|------|---------------|----------------------------------|---------------|------|---------------|----|----------------|------|---------------|------|---------------|-------|---------------|-----|
| | | | Sample Location: | | | FXIMS01-01-S1 | | FXIMS02-02-S1 | | FXIMS02-02-S1 DUPE | | FXIMS02-02-S2 | | FXIMS02-10-S1 | | FXIMS02-11-S1 | | FXIMS03-01-S1 | | Brackish Marsh | | FXIMS03-02-S2 | | FXBMS04-04-S1 | | FXBMS04-04-S2 | |
| | | | Sample Depth (ft.): | | | 0 to 0.5 | | 0 to 0.5 | | 0 to 0.5 | | 1.5 to 2 | | 0 to 0.5 | | 0 to 0.5 | | 0.4 to 0.6 | | 0.5 to 1.3 | | 0 to 0.5 | | 0.5 to 1.3 | | 0.5 to 1.3 | |
| | | | Sample Elevation (ft. MSL): | | | 1.0-2 | | 2.0-3 | | 2.5-3 | | 1.1-6 | | 1.5-2 | | 1.1-6 | | 3.0-3.1 | | 2.2-3 | | 3.5-4 | | 2.7-3.5 | | 2.7-3.5 | |
| Salt/Brackish Benchmarks | | | | | Effects Range-Low (ERL) | | | | | Range-Medium (ERM) | | | | | Apparent Effects Threshold (AET) | | | | | | | | | | | | |
| | | | | | (mg/Kg) | | | | | (mg/Kg) | | | | | (mg/Kg) | | | | | | | | | | | | |
| Metals | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Antimony, Total | 7041 | mg/Kg | NS | NS | NS | 9.3 | E | 0.36 | F- | 0.51 | F- | 0.5 | F- | <0.2 | F- | 0.21 | F- | <0.2 | | 1.1 | F- | <0.2 | F- | 0.78 | F- | <0.2 | F- |
| Arsenic, Total | 7060 | mg/Kg | 8.2 | 70 | 35 | B | | 10 | G | 120 | G | 33 | G | 8.4 | | 9.3 | G | 12 | | 26 | G | 3.4 | | 25 | G | 20 | |
| Barium, Total | 6010 | mg/Kg | NS | NS | 48 | A | | 35 | G | 370 | G | 970 | G | 25 | G | 25 | G | 28 | | 33 | G | 3.9 | | 62 | G | 16 | |
| Beryllium, Total | 6010 | mg/Kg | NS | NS | NS | | | 1.5 | G | 8 | G | 4.2 | G | 0.64 | | 0.69 | G | 0.68 | | 2.1 | G | <0.4 | | 2.1 | G | 0.85 | |
| Cadmium, Total | 6010 | mg/Kg | 1.2 | 9.6 | 3 | N | | NT | | NT | | NT | <0.5 | | 0.55 | | 0.55 | | NT | | <0.5 | | NT | | NT | | NT |
| Cadmium, Total | 7131 | mg/Kg | 1.2 | 9.6 | 3 | N | | 1.2 | | <0.5 | | 0.78 | | NT | | 1.8 | | NT | | 1 | | <0.5 | | NT | | <0.5 | |
| Chromium, Total | 6010 | mg/Kg | 81 | 370 | 62 | N | | 45 | | 52 | | 74 | | 30 | | 36 | | 27 | | 48 | | 5.2 | | 42 | | 20 | |
| Copper, Total | 6010 | mg/Kg | NS | NS | 340 | M,O | | 53 | | 64 | | 70 | | 18 | | 32 | | 20 | | 55 | | 3.4 | | 46 | | 3.5 | |
| Iron, Total | 6010 | mg/Kg | NS | NS | 220000 | | | 19000 | | 25000 | | 20000 | | 22000 | FK- | 21000 | | 21000 | | 15000 | | 6400 | FK- | 18000 | | 38000 | FK- |
| Lead, Total | 6010 | mg/Kg | 46.7 | 218 | 400 | B | | 45 | G | 34 | G | 75 | G | 27 | | 44 | G | 25 | | 77 | G | NT | | 78 | G | 21 | |
| Lead, Total | 7421 | mg/Kg | 46.7 | 218 | 400 | B | | NT | | NT | | NT | | NT | | NT | | NT | | NT | | 3.5 | | NT | | NT | |
| Manganese, Total | 6010 | mg/Kg | NS | NS | 180 | N | | 180 | | 94 | | 130 | | 210 | | 240 | | 200 | | 210 | | 83 | | 250 | | 210 | |
| Mercury, Total | 7471 | mg/Kg | 0.15 | 0.71 | 0.41 | M | | 0.48 | | 0.42 | | 0.28 | A | 0.52 | | 0.29 | | 0.25 | | <0.05 | A | | 0.18 | | <0.05 | A | |
| Nickel, Total | 6010 | mg/Kg | 20.9 | 51.6 | 110 | E,L | | 27 | G | 18 | G | 3.9 | G | 14 | | 30 | G | 12 | | 17 | G | 6.4 | | 54 | G | 27 | |
| Selenium, Total | 7740 | mg/Kg | NS | NS | 1000 | A | | 1.1 | G | 18 | G | 0.27 | | 0.32 | | 0.32 | | 0.39 | F- | 0.2 | | 1.7 | G | 0.2 | | 1.7 | G |
| Vanadium, Total | 6010 | mg/Kg | NS | NS | 57 | I | | 75 | | 60 | | 100 | | 25 | | 51 | | 26 | | 150 | | 20 | | 230 | | 94 | |
| Zinc, Total | 6010 | mg/Kg | 150 | 410 | 410 | I | | 130 | G | 55 | G | 140 | G | 75 | | 210 | G | 68 | | 140 | G | 12 | | 130 | G | 52 | |
| AVS/SEM | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Acid Volatile Sulfide | INT04 | umol/g | NS | NS | NS | | | 8 | | 15 | | NT | | NT | | <0.4 | | NT | | 64 | | NT | | 1.3 | | NT | |
| SEM/AVS Ratio | AVS/SEM | | NS | NS | NS | | | 0.26 | | 0.14 | | NT | | NT | | >4.6 | | NT | | 0.45 | | NT | | 1.8 | | NT | |
| Cadmium, Extractable | SEM-6010 | umol/g | NS | NS | NS | | | 0.006 | | <0.007 | | NT | | NT | | 0.008 | | NT | | <0.027 | | NT | | <0.018 | | NT | |
| Copper, Extractable | SEM-6010 | umol/g | NS | NS | NS | | | 0.19 | | 0.14 | | NT | | NT | | 0.12 | | NT | | 0.23 | | NT | | 0.37 | | NT | |
| Lead, Extractable | SEM-6010 | umol/g | NS | NS | NS | | | 0.09 | G | 0.19 | G | NT | | NT | | 0.17 | G | NT | | 0.42 | G | NT | | 0.39 | G | NT | |
| Nickel, Extractable | SEM-6010 | umol/g | NS | NS | NS | | | 0.32 | G | 0.39 | G | NT | | NT | | <0.2 | G | NT | | <1 | G | NT | | <0.7 | G | NT | |
| Zinc, Extractable | SEM-6010 | umol/g | NS | NS | NS | | | 1.5 | G | 1.4 | G | NT | | NT | | 1.4 | G | NT | | 2.3 | G | NT | | 1.6 | G | NT | |
| Other | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TOC by Lloyd Kahn | OSIA | mg/Kg | NS | NS | NS | | | 31000 | | 90000 | | NT | | NT | | 20000 | | 19000 | | >240000 | | NT | | >110000 | | NT | |
| % Solids | IN623 | % | NS | NS | NS | | | 58.4 | | 44.2 | | 39.5 | | 59 | | 61.4 | | 59.5 | | 16.8 | | 57.2 | | 22 | | 69.3 | |

- General Notes:**
- < = Analyte not detected at a concentration above the specified laboratory reporting limit.
 - mg/Kg = milligrams per kilogram.
 - umol/g = micromoles per gram.
 - Salt/Brackish Benchmarks are effects based screening values from National Oceanic and Atmospheric Administration (NOAA), September 1999.
 - ERL = Effects Range-Low.
 - ERM = Effects Range-Medium.
 - AET = Apparent Effects Threshold; entry is lowest value among AET levels: I = Infaunal community impacts; A = Amphipod; B = Bivalve; M = Microtox; O = Oyster larvae; E = Echinodem larvae; L = Larval; N = Nereid biomass.
 - NS = No standard established.
 - NT = Not tested for this analyte.
 - MSL = Mean Sea Level.
 - Shaded values indicate that the concentration exceeds the highest applicable screening level.

- Qualifying Notes:**
- The result is estimated due to exceedance of holding times.
 - The result is estimated due to matrix spike recovery outside of control limits.
 - The result is estimated due to duplicate precision outside of control limits.
 - The result is estimated due to blank spike compound recovery outside of control limits.
 - *+ or *- Indicates potential for high (+) or low (-) bias in result based on spike recovery.

Table 34.
Wetland Sediment Analytical Results - Fox Hill Cove
Phase II Site Assessment
Brayton Point Station
RTN 4-13169
Somerset, Massachusetts

| | | | | | | Brackish Marsh (continued) | | | | | | | | |
|-----------------------|----------|--------|-------------------|----------------------------|--|----------------------------|----------------------------|--|--------------|--------------|----------|----------|-------|--------|
| | | | | | | FXMDS05-05-S1 | FXMDS05-05-S2 | FXBMSD-06-S1 | FXBMSD-06-S2 | FXBMSD-13-S1 | FXC-01 | | | |
| | | | | | | 8/14/99 | 8/14/99 | 8/15/99 | 8/16/99 | 12/13/99 | 8/27/99 | | | |
| | | | | | | 0.4 to 0.6 | 0.5 to 1 | 0.4 to 0.5 | 0.5 to 0.9 | 0.5 to 1 | 0.5-1.0 | | | |
| | | | | | | 3.0-3.1 | 2.5-3 | 3.5-3.8 | 3.1-3.5 | 3-3.5 | 3.0-3.5 | | | |
| | | | | | | Sample Location: | | | | | | | | |
| | | | | | | Sample Date: | | | | | | | | |
| | | | | | | Sample Depth (ft): | | | | | | | | |
| | | | | | | Sample Elevation (ft MSL): | | | | | | | | |
| | | | | | | Cover Type: | | | | | | | | |
| Analyte | Method | Units | Effects | | | Effects Range-Low (mg/Kg) | Range-Medium (ERM) (mg/Kg) | Apparent Effects Threshold (AET) (mg/Kg) | | | | | | |
| | | | Range-Low (mg/Kg) | Range-Medium (ERM) (mg/Kg) | Apparent Effects Threshold (AET) (mg/Kg) | | | | | | | | | |
| Metals | | | | | | | | | | | | | | |
| Antimony, Total | 7041 | mg/Kg | NS | NS | NS | 9.3 | E | 0.72 F | | 0.51 F | 0.54 F | 0.33 F | 0.28 | 0.57 |
| Arsenic, Total | 7060 | mg/Kg | 8.2 | 70 | 35 | B | | 87 G | | 58 | 24 G | 78 | 16 | 44 |
| Barium, Total | 6010 | mg/Kg | NS | NS | NS | 48 | A | 730 G | | 290 | 92 G | 270 | 12 | 420 |
| Beryllium, Total | 6010 | mg/Kg | NS | NS | NS | | | 7 G | | 4.3 | 1.4 G | 3 | 0.41 | 3.3 |
| Cadmium, Total | 6010 | mg/Kg | 1.2 | 9.6 | 3 | N | | NT | | < 0.5 | NT | < 0.5 | < 0.5 | < 0.56 |
| Cadmium, Total | 7131 | mg/Kg | 1.2 | 9.6 | 3 | N | | 0.86 | | NT | 0.84 | NT | NT | NT |
| Chromium, Total | 6010 | mg/Kg | 81 | 370 | 62 | N | | 47 | | 18 | 44 | 18 | 10 | 15 |
| Copper, Total | 6010 | mg/Kg | 34 | 270 | 330 | M O | | 85 | | 100 | 55 | 67 | 4.3 | 27 |
| Iron, Total | 6010 | mg/Kg | NS | NS | 220000 | | | 18000 | | 15000 FK | 19000 | 11000 FK | 20000 | 7900 |
| Lead, Total | 6010 | mg/Kg | 46.7 | 218 | 400 | B | | 58 G | | 13 | 75 G | 12 | 22 | 13 |
| Lead, Total | 7421 | mg/Kg | 46.7 | 218 | 400 | B | | NT | | NT | NT | NT | NT | NT |
| Manganese, Total | 6010 | mg/Kg | NS | NS | 250 | N | | 150 | | 70 | 250 | 100 | 210 | 55 |
| Mercury, Total | 7471 | mg/Kg | 0.15 | 0.71 | 0.41 | M | | 0.2 | | 0.06 A | 0.13 | 0.11 A | 0.06 | 0.29 |
| Nickel, Total | 6010 | mg/Kg | 20.9 | 51.6 | 110 | E L | | 7.0 G | | 14 | 150 G | 11 | 6.8 | 170 |
| Selenium, Total | 7740 | mg/Kg | NS | NS | 1000 | A | | 7.2 G | | 8.4 | 2.3 G | 36 | 0.52 | 5.5 |
| Vanadium, Total | 6010 | mg/Kg | NS | NS | 57 | N | | 2800 | | 27 | 570 | 36 | 20 | 1200 |
| Zinc, Total | 6010 | mg/Kg | 150 | 410 | 410 | I | | 130 G | | 30 | 140 G | 22 | 34 | 28 |
| AVS/SEM | | | | | | | | | | | | | | |
| Acid Volatile Sulfide | IN704 | umol/g | NS | NS | NS | | | 6.1 | | NT | 8.3 | NT | NT | NT |
| SEM/AVS Ratio | AVS/SEM | | NS | NS | NS | | | 1.1 | | NT | 0.55 | NT | NT | NT |
| Cadmium, Extractable | SEM-6010 | umol/g | NS | NS | NS | | | < 0.021 | | NT | < 0.017 | NT | NT | NT |
| Copper, Extractable | SEM-6010 | umol/g | NS | NS | NS | | | 0.15 | | NT | 0.12 | NT | NT | NT |
| Lead, Extractable | SEM-6010 | umol/g | NS | NS | NS | | | 0.26 G | | NT | 0.25 G | NT | NT | NT |
| Nickel, Extractable | SEM-6010 | umol/g | NS | NS | NS | | | 4.5 G | | NT | 2.1 G | NT | NT | NT |
| Zinc, Extractable | SEM-6010 | umol/g | NS | NS | NS | | | 1.9 G | | NT | 2.1 G | NT | NT | NT |
| Other | | | | | | | | | | | | | | |
| TOC by Lloyd Kahn | Q51A | mg/Kg | NS | NS | NS | | | > 120000 | | NT | > 120000 | NT | 40000 | NT |
| % Solids | IN623 | % | NS | NS | NS | | | 21.7 | | 72.8 | 21.5 | 68 | 46.7 | 59 |

General Notes:

1. "C" = Analyte not detected at a concentration above the specified laboratory reporting limit.
2. mg/Kg = milligrams per kilogram.
3. umol/g = micromoles per gram.
4. Salt/Brackish Benchmarks are effects based screening values from National Oceanic and Atmospheric Administration (NOAA), September 1999.
5. ERL = Effects Range-Low.
6. ERM = Effects Range-Medium.
7. AET = Apparent Effects Threshold; entry is lowest value among AET levels. I = Infaunal community impacts. A = Amphipod; B = Bivalve; M = Microtox; O = Oyster larvae;
8. E = Echinoderm larvae; L = Larval; N = Neerthis boesayii.
9. NS = No standard established.
10. NT = Not tested for this analyte.
11. MSL = Mean Sea Level.
11. Shaded values indicate that the concentration exceeds the highest applicable screening level.

Qualifying Notes:

- A. The result is estimated due to exceedance of holding times.
- F. The result is estimated due to matrix spike recovery outside of control limits.
- G. The result is estimated due to duplicate precision outside of control limits.
- K. The result is estimated due to blank spike compound recovery outside of control limits.
- *+ or *- Indicates potential for high (+) or low (-) bias in result based on spike recovery.

Table 35.
Wetland Sediment Analytical Results - Reference Covs
Phase II Site Assessment
Brayton Point Station
RTN 4-13169
Somerset Massachusetts

| Analyte | Method | Units | Salt/Brackish Benchmarks | | | Chase Cove | | | | Shady Isle Cove | |
|-------------------|--------|-------|---------------------------------|------------------------------------|--|--|--|--|--|--|--|
| | | | | | | Cover Type: | | Brackish Marsh | Intertidal Mudflat | Brackish Marsh | Intertidal Mudflat |
| | | | Effects Range-Low (ERL) (mg/Kg) | Effects Range-Medium (ERM) (mg/Kg) | Apparent Effects Threshold (AET) (mg/Kg) | Sample Location: Sample Date: Sample Depth (ft): |
| Metals | | | | | | | | | | | |
| Antimony, Total | 7041 | mg/Kg | NS | NS | 9.3 E | | | | | | |
| Arsenic, Total | 7060 | mg/Kg | 8.2 | 70 | 35 B | 0.35 FK | < 0.2 FK | < 0.2 FK | < 0.2 FK | < 0.2 FK | < 0.2 FK |
| Barium, Total | 6010 | mg/Kg | NS | NS | 48 A | 5.3 | 7.8 | 8.5 | 2.7 | 7.5 | 7 |
| Beryllium, Total | 6010 | mg/Kg | NS | NS | NS | 4.4 | 15 | 4.1 | 3.2 | 19 | 11 |
| Cadmium, Total | 6010 | mg/Kg | NS | NS | NS | < 0.4 | 0.54 | < 0.4 | < 0.4 | 1.2 | 0.52 |
| Chromium, Total | 6010 | mg/Kg | 1.2 | 9.6 | 3 N | 0.82 | 1.2 | < 0.5 | < 0.5 | 0.82 | 0.61 |
| Copper, Total | 6010 | mg/Kg | 81 | 370 | 62 N | 9.2 | 56 | 9 | 6.8 | 39 | 25 |
| Iron, Total | 6010 | mg/Kg | 34 | 270 | 390 M,O | 7.9 | 67 | 5.7 | 4.4 | 67 | 34 |
| Lead, Total | 6010 | mg/Kg | NS | NS | 220000 N | 2000 FK | 15000 FK | 15000 FK | 6800 FK | 21000 FK | 14000 FK |
| Manganese, Total | 6010 | mg/Kg | 46.7 | 218 | 400 B | 67 | 170 | 15 | 12 | 250 | 160 |
| Mercury, Total | 7471 | mg/Kg | NS | NS | 260 N | 16 | 150 | 75 | 73 | 210 | 160 |
| Nickel, Total | 6010 | mg/Kg | 0.15 | 0.71 | 0.41 M | < 0.05 A | 0.67 A | 0.07 A | < 0.05 A | 0.24 A | 0.26 A |
| Selenium, Total | 7740 | mg/Kg | 20.9 | 51.6 | 110 E,L | 6.9 | 16 | 3.9 | 4.2 | 19 | 12 |
| Vanadium, Total | 6010 | mg/Kg | NS | NS | 1000 A | 0.32 | 0.42 | 0.23 | 0.13 | 0.51 | 0.28 |
| Zinc, Total | 6010 | mg/Kg | NS | NS | 57 N | 20 | 38 | 19 | 8.6 | 67 | 45 |
| Zinc, Total | 6010 | mg/Kg | 150 | 410 | 410 I | 48 | 170 | 17 | 21 | 180 | 110 |
| Other | | | | | | | | | | | |
| TOC by Lloyd Kahn | QSIA | mg/Kg | NS | NS | NS | > 140000 | 65000 | 48000 | 7800 | > 94000 | 31000 |
| % Solids | IN623 | % | NS | NS | NS | 19.1 | 33.9 | 52 | 73.2 | 23.7 | 56.4 |

General Notes

- "c" = Analyte not detected at a concentration above the specified laboratory reporting limit.
- mg/Kg = milligrams per kilogram.
- umol/g = micromoles per gram.
- Effects based screening values from National Oceanic and Atmospheric Administration (NOAA), September 1999.
- Background values are derived from a compilation of sources, but come primarily from the International Joint Commission Sediment Subcommittee (1988).
- ERL = Effects Range-Low
- ERM = Effects Range-Medium
- AET = Apparent Effects Threshold; entry is lowest value among AET levels: I = Infaunal community impacts; A = Amphipod; B = Bivalve; M = Microtox; O = Oyster larvae; E = Echinoderm larvae; L = Larval; N = Neanthes bioassay.
- NS = No standard established.
- NT = Not tested for this analyte.
- MSL = Mean Sea Level.
- Boxed values indicate that the concentration exceeds the highest applicable screening level.

Qualifying Notes:

- A. The result is estimated due to exceedance of holding times.
- F. The result is estimated due to matrix spike recovery outside of control limits
- K. The result is estimated due to blank spike compound recovery outside of control limits.

Attachment C

Comprehensive Site Assessment (CSA) letter, dated October 26, 2007



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHEAST REGIONAL OFFICE
20 RIVERSIDE DRIVE, LAKEVILLE, MA 02347 508-946-2700

DEVAL L. PATRICK
Governor

IAN A. BOWLES
Secretary

TIMOTHY P. MURRAY
Lieutenant Governor

LAURIE BURT
Commissioner

October 26, 2007

Kenneth L. Small
Dominion Brayton Point, LLC.
P.O. Box 440
Somerset, Massachusetts 02726-0440

RE: Provisional Approval with Conditions
Application for: BWP SW23 Comprehensive Site Assessment
Transmittal Number: W105247

AT: Somerset Powerplant Ash Landfills (Cells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, and 10A)
Brayton Point Road
Somerset, MA
Facility Identification # 402959

2007 OCT 30 AM 8:24
BRAYTON PT. STATION

Dear Mr. Small:

The Massachusetts Department of Environmental Protection (the "MassDEP") has completed its administrative and technical review of the Comprehensive Site Assessment ("CSA") permit application for Somerset Powerplant Ash Landfills Cells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 10A (excluding Cell 1A). The permit application was prepared on behalf of Dominion Brayton Point, LLC (the "Applicant") by Roux Associates of Burlington, Massachusetts and submitted on November 14, 2006 to MassDEP. MassDEP has determined the permit application is administratively and technically complete and hereby approves the Comprehensive Site Assessment subject to the conditions specified herein.

I. SUBMITTALS:

MassDEP has reviewed the permit application (the "Application") pursuant to 310 CMR 19.000 Solid Waste Regulations, 310 CMR 19.150 Landfill Assessment Requirements and MassDEP's *Landfill Technical Guidance Manual, May 1997* (the "Manual"). The Application consists of the following:

- A. A Dominion letter report dated November 9, 2006 that summarized MassDEP discussions with Dominion on the regulatory approach for dividing the site into two (2) areas.
- B. The permit transmittal, application forms for a Comprehensive Site Assessment (BWP SW 23) and documents received by MassDEP on November 14, 2006 prepared by Roux Associates of Burlington, Massachusetts.

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD Service - 1-800-298-2207.

DEP on the World Wide Web: <http://www.mass.gov/dep>

Printed on Recycled Paper

C. A GEI Consultants, Inc. report prepared on behalf of USGen New England, Inc that consists of three bound documents entitled:

Phase II Comprehensive Site Assessment
Brayton Point Station Somerset, MA
RTN 4-13169
Vols. I, II, III
September 30, 2000

In addition to the Application, MassDEP reviewed ongoing groundwater monitoring data collected from the environmental monitoring network for landfill Cells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 10A.

Previous Investigations under Solid Waste Regulations and Massachusetts Contingency Plan (MCP): In 1996 the landfill assessment process was initiated by a previous site owner, New England Power Company, based upon the detection of elevated concentrations of nickel, iron and vanadium detected in groundwater samples from on-site landfill monitoring wells. A solid waste permit application for an Initial Site Assessment (BWP SW 12) for oil ash-cells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 10A was received by MassDEP on January 6, 1997. On March 21, 1997 MassDEP approved the Initial Site Assessment with conditions. MassDEP received an ISA addendum on June 16, 1997.

On July 8, 1997, MassDEP's Bureau of Waste Site Cleanup was notified of concentrations of heavy metals, specifically vanadium, nickel, and arsenic in soil and vanadium in groundwater, in excess of MCP reportable concentrations in the vicinity of Cell 1A. MassDEP's Bureau of Waste Site Cleanup assigned release-tracking number (RTN) 4-13169. The groundwater samples had been collected as part of an investigation of an area upgradient of the lined oil ash cells. A Phase I investigation and Tier classification was submitted to MassDEP, Bureau of Waste Site Cleanup on July 7, 1998. During the Phase I for 4-13169, the site was defined as including an area of approximately three (3) acres (including Cell 1A) located within former cooling canal and east of lined ash Cells 1-8.

A meeting was held between MassDEP and USGen on March 11, 1999 to coordinate site investigations under the MCP and Solid Waste Regulations. MassDEP and USGen agreed that comprehensive investigations of the ash management area was to proceed with the investigations under the MCP and RTN 4-13169 prior to completing a CSA for the lined oil ash landfill cells in accordance with solid waste regulations. As a result, the site (4-13169) limits were expanded during the Phase II to include most of the northern half of the property including but not limited to Cells 1, 1A, 2-10 and 10A. Based upon the findings of the ISA and MCP Phase I, MassDEP and USGen agreed upon the list of constituents of concern and areas to be investigated. Additionally, MassDEP and USGen agreed that the MCP investigation would incorporate MassDEP's solid waste management sections comments for the development of the CSA scope of work and comments regarding the revisions to the groundwater monitoring plan for lined landfill Cells 1-10 and 10A. On March 18, 1999, MassDEP issued comments for the development of the CSA scope of work and revisions to the groundwater monitoring plan. The Phase II Scope of work was submitted on June 30, 1999. The Phase II Comprehensive Site Assessment (the "Phase II") for RTN 4-13,169 was prepared by GEI Consultants, Inc. and was submitted to MassDEP on September 30, 2000. The Phase II report was written to satisfy key requirements of a MCP Phase II report and the Comprehensive Site Assessment requirements under solid waste regulations. The public involvement plan was submitted to MassDEP on November 29, 2000. On April 13, 2001 MassDEP extended the deadline for submittal of the MCP Phase III and for the completion of the of the solid waste assessment requirements. In a November 9, 2006 letter Dominion Brayton Point, LLC summarized discussions with MassDEP concerning completion of response and remedial actions for RTN 4-13169 and completion of the CSA and Corrective Action Alternative Analysis (CAAA) for landfill Cells 1-10 and 10A. The Applicant proposed to divide the northern half of the property into two (2) areas. Area 1 will include landfill Cells 1-10 and 10A and the adjacent environments (Lee River and Fox Hill Cove). Area 2 will include Cell 1A. Area 1 will be assessed and remediated pursuant to Solid

Waste Regulations 310 CMR 19.000 and Area 2 will be assessed and remediated pursuant to 310 CMR 40.0000 Massachusetts Contingency Plan under RTN 4-13169. The focus of MassDEP's permit application review is Area 1.

II. SITE DESCRIPTION & PREVIOUS INVESTIGATIONS:

Brayton Point Power Station is a fossil fuel powerplant that is located on approximately 250-acre point of land surrounded by Taunton and Lee River to the east and west, respectively, by Mount Hope Bay to the south and by Fox Hill Cove to the north. The Brayton Point Power Station property can be divided into two halves: the southern half of the property consists of the power generation and plant operations and the northern half of the property that consists of the current and historical areas of wastewater treatment and ash management. Within the northern half of the property there are two (2) active lined Cells (10 and 10A) and ten (10) inactive, lined oil ash disposal cells (Cells 1, 1A, 2, 3, 4, 5, 6, 7, 8, and 9), former wastewater treatment system basin areas, and coal ash fill areas.

Brayton Point Station has generated electrical power by burning coal, oil and natural gas. The burning of oil and coal generate ash and "power plant sludge" which is disposed of in off-site landfills and in on-site lined landfills. Power plant sludge consists primarily of oil ash from the burning of oil, coal ash from the burning of coal, and metal hydroxide precipitates (primary oil and coal ash residues) from the plants non-sanitary wastewater treatment system. The principal constituents of the waste streams are silica, carbon, iron, sulfur, magnesium, oxygen, aluminum, nickel, and vanadium. Coal ash generated during the burning of coal has been used as structural fill on the 250-acre property.

Prior to the solid waste regulations and construction of the lined landfill cells at the property, coal ash was used on the property as fill or disposed of at off-site landfills. From 1963 to 1970 oil and coal ash were managed in the northern portion of the property in the vicinity of the current oil ash cells. Coal ash was disposed and stored on the northern half of the property. Oil ash was treated in the historical ash settling ponds, discharged from the former ash settling ponds to Fox Hill Cove, and placed in the on-site lined landfill cells. As part of the ash recovery system, a series of three unlined ash-settling ponds were constructed and operated between approximately 1969 and 1975. These ponds were used as part of a historical wastewater treatment system for settling out oil ash prior to the discharge of treated wastewater to Fox Hill Cove. As a result of these historical ash management operations coal ash and oil ash are present within the soils throughout the northern portion of the property.

The history of this site indicates that oil ash was present throughout the northern half of the property and may have been discharged to Fox Hill Cove as part of the historical wastewater treatment system operations. This is relevant to the current investigations, as the residual oil ash throughout the northern half of the property appears to be a likely source of heavy metals detected during the previous investigations and historically detected in the groundwater quality monitoring programs. In addition, the history of the site indicates there has been substantial filling and excavation in the past thirty-five (35) years that have resulted in the ground surface elevation generally increasing ten (10) to twenty (20) feet. The construction of twelve (12) oil ash disposal cells and three (3) wastewater treatment system basins and the construction and subsequent filling of the former cooling canal, have resulted in the spreading of oil ash throughout the northern half of the property.

Lined Landfill Cells: Beginning in 1979 11 lined landfill cells (Cells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 10A) were constructed in compliance with Massachusetts solid waste regulations. Cells 1, 2, 3, 4, 5, 6, 7, and 8 are lined, capped and closed oil ash landfill cells located on the western perimeter near the Lee River. Each of these eight (8) cells is approximately one half acre in size. Cell 9 is a lined, capped and closed oil ash landfill cell that is approximately 1.5 acres in size. Cell 9 is located in the northwestern portion of the site adjacent to Fox Hill Cove. Cell 10 and 10A are the only active landfill cells at Brayton Point Station and have a combined footprint of five (5) acres. Cells 10 and 10A are located in northeastern portion of the site.

Cell 1A is separated from the eleven (11) other oil ash landfill cells by the former cooling canal. Cell 1A is approximately three quarters of an acre in size and contains oil ash, coal ash and power plant sludge. Cell 1A has a liner and cap. The Phase I Initial Site Investigation for Cell 1A (RTN 4-13169) prepared by GEI Consultants, Inc. includes the following statement: "Information related to the construction of Cell 1A, or the volume of material placed in the cell, and the time period Cell 1A was used, are not precisely known." In the Phase II report dated September 30, 2000, GEI notes "Cell 1A was constructed as an emergency storage area in 1979, under the approval of DEQE". Dominion does not have any environmental permit specifically for the Cell 1A site. Oil ash is present in the soils adjacent to Cell 1A along the western and northern sides.

As required by 310 CMR 19.000, groundwater monitoring programs have been implemented for oil ash Cells 1-8, oil ash Cell 9, and oil ash Cells 10/10A since 1982, 1986, and 1993, respectively. Prior to the commencement of the initial site assessment investigations groundwater samples for monitoring wells for the oil ash cells have been analyzed for the following parameters:

- Dissolved metals (arsenic, barium, cadmium, chromium (total and hexavalent), copper, iron, lead, manganese, mercury, nickel, selenium, silver, vanadium and zinc),
- Alkalinity, chemical oxygen demand, chloride, cyanide, nitrate as nitrogen, sulfate, total dissolved solids, total organic carbon,
- Volatile organic compounds via EPA method 8260,
- Field indicator parameters: pH, temperature, specific conductance.

Additionally, wastewater treatment plant infiltration basin #3, which was located between Cells 9 and 10, has been monitored since 1991. Groundwater samples from the monitoring wells for basin #3 have been analyzed for the following parameters:

- arsenic, barium, cadmium, calcium, chromium, copper, iron, lead, magnesium, manganese, mercury, potassium, selenium, silver, sodium, and zinc,
- Alkalinity, chemical oxygen demand, chloride, fluoride, nitrate as nitrogen, will increase, sulfate, total nitrogen,
- Volatile organic compounds via EPA method 624.

Unlined Basin No. 3 has been remediated and closed. Contaminated material within unlined treatment basin No. 3 was removed and disposed at a landfill.

In summary three potential sources of heavy metals in the environment were identified during the initial site assessment: 1) subsurface areas of oil ash and oil ash contaminated soils and sediments; 2) lined landfill cells; and 3) former unlined basin No.3. The Initial Site Assessment indicated that one or more of these potential sources cause elevated concentrations of heavy metals in soil and groundwater and potentially in surface water, sediments and biota (plants, invertebrates, fish/shellfish). The extent to which these media were impacted was unknown at the time of the initial site assessment and a primary focus of the CSA. The CSA investigation was designed to address the following objectives and data gaps:

- To identify the source of the heavy metals in soil and groundwater,
- Determine whether heavy metals are present in other media (surface water, sediment, nature and extent, and biota)
- Determine the horizontal and vertical extent of heavy metals in each media,
- Evaluate whether any of the potential receptors are exposed to condition of significant risk,
- Evaluate need for remedial action.

III. COMPREHENSIVE SITE ASSESSMENT REPORT SUMMARY:

Potential Public Health and Environmentally Sensitive Receptors: There are no vernal pools, areas of critical environmental concern, sole source aquifers, protected open space, or endangered species habitat, located within 500 feet of Area 1. Residential homes are located across the Lee River and Fox Hill Cove, approximately 0.3 miles west and 0.4 miles north, respectively. A residential home and farm are located approximately 1000 feet east of the site (hydraulically upgradient). Salt water and non-forested wetlands are located to the north and northeast, and coastal and inland water bodies (Lee River and Fox Hill Cove) abut the site to the west-northwest and north, respectively. Fox Hill Cove is located on Brayton Point Station's northern property boundary and covers an area of approximately eighteen (18) acres. Fox Hill Cove is a tidal embayment of the Lee River. The freshwater marsh, at the head of the Cove transitions into a brackish saltwater marsh and intertidal mud flat to the west.

Area 1 is not located within a current or potential drinking water source area. There are no private drinking water wells or public water supply wells and groundwater in most of Area 1 is brackish. Surface soils in Area 1 are potentially accessible (0-3 feet) and adults are assumed to be present and potentially exposed at low intensity and frequency (Category S-3). Children, in the form of trespassers, may also be present at low frequency and intensity (Category S-2). Category S-3 is also applicable to surface soils in Area 1 at depths greater than fifteen (15) feet. Therefore for Area 1, the applicable MCP soil categories are S-2 and S-3 and the applicable MCP groundwater category is GW-3.

Geology and Hydrogeology: Brayton Point Station is surrounded by the Taunton and Lee Rivers to the east and west, respectively and Mount Hope Bay to the south. Both the Lee and Taunton rivers flow south into Mount Hope Bay to the south and eventually into Narragansett Bay. The Lee River, Taunton River and Mount Hope Bay are tidal. Groundwater from Area 1 flows into Mount Hope Bay via the Lee River.

Surficial geology in the vicinity of the site is comprised of glacial till and stratified outwash deposits. On-site borings indicate there is a significant fill layer comprised of sand with coal ash and fly ash. The fill is ten (10) to sixty (60) feet thick and overlies a sand and silty-sand layer that is fifteen (15) to thirty (30) feet thick. The sand and silty-sand layer overlies glacial till comprised of silty-sand with gravel traces the clay. The till is generally five (5) to thirty-five (35) feet thick and overlies bedrock. Bedrock comprised of shale and phyllite is found at depths of thirty (30) to eighty (80) feet below the ground surface.

Groundwater is found at depths from one (1) foot to forty (40) feet below the ground surface. Groundwater flow direction is west toward the Lee River and west-northwest towards Fox Hill Cove on the northern portion of Area 1. MW6 is the only monitoring well for which groundwater elevations are affected by tidal surface water elevations. The groundwater flow rate for the site is estimated at 0.2 feet per day or seventy-three (73) feet per year.

Source, Nature and Extent: The primary source of heavy metals in the soil, sediment and groundwater within Area 1 is the residual oil ash from the former ash settling ponds and their historical discharge point into Fox Hill Cove. Vanadium and other heavy metals detected within Area 1 are contributed to by both coal ash and oil ash. The Applicant indicates that there is no evidence that lined oil ash cells are contributing to heavy metal detections in groundwater. Cell 1A (Area 2) is being investigated under the MCP and RTN 4-13169.

The nature of the contamination within Area 1 is heavy metals associated with historical ash management practices. The contaminants of concern (COCs) list was developed based on historical sampling at Brayton Point Station over the past twenty (20) years. Soil, groundwater, surface water and ash materials

have been analyzed for wide variety of chemical constituents including metals, inorganics, volatile organic compounds, polychlorinated biphenyls, total petroleum hydrocarbons, and polynuclear aromatic hydrocarbons. Of these constituents, only metals are present as indicators of coal ash and oil ash. The list of COCs consists of the following metals: antimony, arsenic, barium, beryllium, cadmium, chromium, copper, iron, lead, manganese, mercury, nickel, selenium, vanadium and zinc. The COCs were analyzed in the groundwater, soil, sediment, surface water and biota sampled during the CSA investigation.

Vanadium was selected as the contaminant of concern that best describes the extent of the contamination in soil, groundwater and sediment. The extent of heavy metals in soil and sediment is limited to the areas where oil ash was deposited between 1965 and the mid-1970s. Vanadium and other heavy metals in groundwater have generally been detected in the immediate vicinity of areas where oil ash in soil was observed, indicating that most groundwater contamination is a function of rainwater infiltration and percolation through these oil ash layers.

Evidence of historical discharge of oil ash via the former ash settling ponds to Fox Hill Cove was detected in the sediments based upon chemical testing.

Soil: The highest vanadium concentrations associated with Area 1 are adjacent to Cell 9 and are associated with visible layers of oil ash found in subsurface areas of the former ash settling ponds. Concentrations of vanadium in soil greater than 150 ppm generally indicates oil ash is present. Vanadium concentrations less than 150 ppm may be associated with coal ash only. Reworking and regrading of the soil has resulted in the mixing of oil ash, coal ash and soils. Concentrations of vanadium in soil between 150 and 1000 ppm are generally found in areas surrounding the former ash settling basins.

Groundwater: sixty-nine (69) groundwater samples were collected from the northern half of the property in August 1999 in May 2000 as part of the CSA investigations. Groundwater samples were analyzed for the following parameters:

- antimony, arsenic, barium, beryllium, cadmium, chromium, copper, iron, lead, manganese, mercury, nickel, selenium, vanadium and zinc
- bicarbonate, carbonate, chloride, sulfate, nitrate, calcium, magnesium, potassium and sodium
- total dissolved solids

The maximum concentrations of the heavy metals detected in groundwater were found in the vicinity of Cell 1A (antimony, copper, and vanadium), landfill Cells 1-8 (chromium, lead and nickel), the former cooling canal (barium, cadmium, iron, manganese, selenium, and zinc), and landfill Cells 10/10A (arsenic).

Vanadium has been detected in groundwater samples collected from monitoring wells at concentrations greater than one (1) ppm. The Applicant has concluded that the extent of heavy metals in groundwater appears to generally be limited to areas where there is evidence of the presence of oil ash including the areas of the former ash settling ponds. Based upon the distribution of vanadium in groundwater, rainwater percolating through the oil ash layers and oil ash contaminated soil appears to be the source of vanadium into groundwater. The Applicant has concluded that based upon the geochemical data and the results of groundwater testing, a plume(s) of dissolved heavy metals is not present at the site. There are no nonaqueous phase liquids or sheens detected in any of the monitoring wells at the site.

Surface Water Sampling-Fox Hill Cove: Seven (7) surface water samples were collected as part of the Phase II were collected from Fox Hill Cove in December 1999 (one sample at low tide and six samples at high tide). Samples were analyzed for dissolved and total metals. Samples were not collected in less than six inches of water.

Four (4) surface water samples were collected from Fox Hill Cove in March 1996. In 1996 the samples were analyzed for dissolved metals only. The concentrations of vanadium detected in surface water samples SW-4B LT, SW-4B HT, SW-5 LT, and SW-5 HT collected from Fox Hill Cove in 1996 were higher (97, 100, 84, 110 ppb, respectively) than the samples collected from similar locations in Fox Hill Cove in 1999 (Fox River-01, FXIMSW-01,-02,-03,-05,-10,-11 (< 2 to 28 ppb).

Surface water samples collected in March 1996 were reported as dissolved concentrations. Surface water samples collected in December 1999 were analyzed for dissolved and totals at each location. There was little variation in the concentrations of vanadium detected regardless of whether the samples was analyzed for dissolved or total metals from the 1999 sampling around.

Concentrations in excess of Ambient Water Quality Criteria (AWQC) or suitably analogous standards were not detected in surface water at the site including Fox Hill Cove. There is currently no AWQC for vanadium. However, a standard for vanadium was derived at 200 ppb. Surface water samples from Fox Hill Cove have not exceeded 200 ppb.

MassDEP requires the Applicant conduct two (2) additional surface water monitoring rounds for Fox Hill Cove (refer to condition #3).

Sediments: Vanadium concentrations in sediment at the site range from 220 to 2,800 ppm. The highest observed concentration of vanadium in sediment was collected from the vicinity of the historic discharge from the former ash settling ponds in Fox Hill Cove. The highest measured vanadium concentrations detected in sediments were in the immediate vicinity of a historical discharge point from the former ash settling ponds. Vanadium and heavy metals were detected in sediments beneath a root mat approximately four (4) to six (6) inches thick and approach background concentrations at a depth of one foot below the bottom of the root mat.

Human Health Risk Characterization & Stage II Ecological Risk Characterization:

The Application included a Method 3 Human Health Risk Characterization and Stage II Ecological Risk Characterization. All data for all the constituents tested during the MCP Phase II were considered in the human health and ecological risk characterization.

Menzie-Cura & Associates as part of the MCP Phase II investigation performed a Method 3 Human Health Risk Characterization for Area 1 and Area 2. The consultants summarized the risk assessment for the site within the Phase II. The consultant presented the following conclusions:

"A condition of no significant risk to human health exists under current and foreseeable uses at the site. This opinion applies to facility and construction workers, trespassers, and recreational users of the waterways within and in the immediate vicinity of Area 1. Recreational users included adults and children swimming/wading/boating in the Lee River and Fox Hill Cole or consuming fish or shellfish collected at the site and its immediate vicinity".

"A condition of no significant risk to safety in public welfare exists under current conditions."

Menzie-Cura & Associates as part of the MCP Phase II investigation performed a Stage II ecological risk characterization for Area 1 and Area 2. The consultant summarized the risk assessment for the site within the Phase II. The consultant presented the following conclusions:

"Ecological conditions including species diversity and abundance are indicative Fox Hill Cove is functioning as would be expected in the absence of any contamination and,

therefore, there's no visible evidence of biologically significant harm. Fox Hill Cove was identified as the largest and most well developed marsh in the Lee River Ecosystem.

"Observations of wildlife indicate that Fox Hill Cove supports a diverse assemblage of wildlife and the benthic species. The habitat survey found that Fox Hill Cove and its surrounding habitat to provide extensive cover, foraging, breeding resources for a diverse variety of birds, mammals, reptiles, and amphibians and that the use of the area by many of the species is high."

"An indication of the potential for biologically significant harm was predicted for birds, other than waterfowl, that consume soil invertebrates in the freshwater portion of Fox Hill Cove. The term "potential" is used when effects are predicted from measurements or models. An indication of potentially for biologically significant harm does not mean that any harm is actually occurring."

"No significant risk of harm was predicted for any species inhabiting the salt-water marsh of Fox Hill Cove. No significant risk of harm was also predicted for carnivorous mammals that consume small mammals, for small mammals that consume freshwater plants, and for waterfowl and small mammals that consume plants and soil invertebrates in the freshwater wetlands. The weight-of-evidence approach for environmental risk assessment indicates that there is likely no significant risk of harm to other mammals such as shrews in the freshwater wetlands."

Field observations by the Applicants and MassDEP's wetlands staff indicate that Fox Hill Cove is a functioning wetland with no evidence of harm.

The need for remediation of Fox Hill Cove will be evaluated as part of the Corrective Action Alternative Analysis (CAAA) (refer to condition #4). The Applicant concluded that remediation of other areas of the site is not required, as a condition of no significant risk exists under current and foreseeable use.

IV. APPROVAL CONDITIONS:

In accordance with its authority granted pursuant to M.G.L. c.111, s. 150A, and 310 CMR 19.000, MassDEP hereby APPROVES the Comprehensive Site Assessment permit application subject to the following conditions:

1. **Permit Limitations:** This Approval is limited to the Comprehensive Site Assessment permit application for the oil ash Cells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 10A. The Applicant shall conduct environmental monitoring of Area 1 in accordance with MassDEP regulations, permits, and as modified by MassDEP through review of monitoring data. MassDEP reserves the right to require additional assessment or action, as deemed necessary to protect and maintain environment free from objectionable nuisance conditions, dangers or threats to public health or the environment.
2. **Regulatory Compliance:** This Approval does not relieve the Applicant, from the responsibility to comply with all other regulatory permitting requirements. The Applicant shall fully comply with all applicable local, state and federal laws, regulations and policies, by-laws and ordinances. Applicable federal requirements include but are not limited to 29 CFR part 1910 OSHA standards governing employee health and safety in the workplace.
3. **Surface Water Monitoring Fox Hill Cove:** The Applicant shall conduct two (2) additional surface water-sampling rounds of Fox Hill Cove. Surface water samples shall be collected from the seven

- (7) locations (FXINSW-01, FXINSW-02, FXINSW-03, FXINSW-05, FXINSW-10, FXINSW-11, and FOXRIVER-01) and analyzed for the following parameters:
- a. total and dissolved metals (antimony, arsenic, boron, beryllium, cadmium, chromium, copper, iron, lead, manganese, mercury, nickel, selenium, vanadium and zinc).
4. Corrective Action Alternative Analysis: **Within 180 days from the date of this letter**, the Applicant shall submit a permit application for a Corrective Action Alternative Analysis (BWP SW24) and the results of the two (2) additional surface water sampling round to MassDEP for review. The Applicant shall discuss whether there were any significant differences between CSA surface water sampling results and the two (2) additional surface water-sampling rounds.
 5. Groundwater Monitoring Network for Oil Ash Cells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 10A: The Applicant shall conduct groundwater monitoring in accordance with the following plan:
 - a. The following sixteen (16) groundwater monitoring wells (BP-05A, BP-05B, BP-06A, BP-06B, BP-07A, BP-07B, BP-04, BPD-701, BPD-702, BP-01, MW401D, MW402S, MW402D, MW403S, MW403D and MW301) shall be sampled quarterly.
 - b. Groundwater samples shall be analyzed for the following parameters:
 - dissolved metals (antimony, arsenic, beryllium, iron, manganese, nickel, selenium, and vanadium),
 - alkalinity,
 - field parameters (dissolved oxygen, pH, specific conductance and temperature).
 6. Reporting Groundwater Exceedances: Exceedances of the GW-3 standards must be reported to MassDEP within fourteen (14) days of the finding (e.g. receipt of the analytical results from the laboratory), and the wells must be re-sampled for the parameters of concern within sixty (60) days of the prior date of sample collection or as specified by MassDEP in accordance with 310 CMR 19.132(1)(j).
 7. Modification of Environmental Monitoring Plan: The Applicant shall continue to perform groundwater monitoring of oil ash landfill Cells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 10A and submit the results in accordance with the environmental monitoring plan (as modified herein) unless MassDEP receives and approves an alternative plan. Any request for modification of the Post Closure Environmental Monitoring Plan shall include a transmittal form, and minor modification permit application BWP SW22.
 8. Lined Cells 10 and 10A: The Applicant shall operate, maintain and monitor lined landfill Cells 10 and 10A in accordance with the authorization to operate permits issued on August 20, 1992 and March 23, 1993, respectively and 310 CMR 19.000.
 9. Post closure Maintenance and Monitoring Cells 1-9: The Applicant shall maintain, care for and monitor Cells 1, 2, 3, 4, 5, 6, 7, 8 and 9 during the post closure period in accordance with 310 CMR 19.142 and maintain the Environmental Control and Monitoring Systems in accordance with 310 CMR 19.133.
 10. Biennial Report: A biennial report for closed oil ash Cells 1-9 shall be submitted to the MassDEP's Solid Waste Section by February 15th of every second year beginning in the year 2008. Pursuant to 310 CMR 19.142 (6) Reporting Requirements, the report shall describe any activity at the site and summarize the results of the environmental monitoring programs.

RIGHT OF APPEAL

Right to Appeal – This approval has been issued pursuant to M.G.L. Chapter 111, Section 150A, and 310 CMR 19.037: Procedure for Existing Facility Permits, Permit Modifications, Permit Renewals and other Approvals, of the “Solid Waste Management Regulations”. Pursuant to 310 CMR 19.037(5), any person aggrieved by the issuance of this determination may file an appeal for judicial review of said decision in accordance with the provisions of M.G.L. Chapter 111, Section 150A and M.G.L. Chapter 30A not later than thirty days following receipt.

Notice of Appeal - Any aggrieved person intending to appeal the decision to the superior court shall provide notice to MassDEP of their intention to commence such action. Said notice of intention shall include MassDEP File Number listed above (transmittal #W105247) and shall identify with particularity the issues and reason(s) why it is believed the approval decision was not proper. Such notice shall be provided to the Office of General Counsel of MassDEP and the Regional Director for the regional office that made the decision. The appropriate addresses to send such notices are:

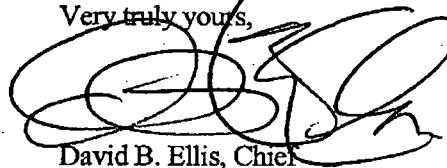
Office of General Counsel
Department of Environmental Protection
One Winter Street
Boston, MA 02108

Gary S. Moran
Regional Director
Department of Environmental Protection
20 Riverside Drive
Lakeville, MA 02347

No allegation shall be made in any judicial appeal of this decision unless the matter complained of was raised at the appropriate point in the administrative review procedures established in those regulations, provided that matter may be raised upon showing that it is material and that it was not reasonably possible with due diligence to have been raised during such procedures, or that matter sought to be raised is of critical importance to the public health or environmental impact of the permitted activity.

Please direct any questions regarding this matter to me at (508) 946-2833 or to Mark Dakers at (508) 946-2847, or write to the letterhead address. Refer to Transmittal Number W105247 in any correspondence to this office regarding this project.

Very truly yours,



David B. Ellis, Chief
Solid Waste Management Section

E/MD/tr
NEPCO\Dominion CSA approval 092407 comments 101607

Attachment D

Corrective Action Alternative Analysis (CAAA) Approval, July 3, 2008



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHEAST REGIONAL OFFICE

20 RIVERSIDE DRIVE, LAKEVILLE, MA 02347 508-946-2700

DEVAL L. PATRICK
Governor

IAN A. BOWLES
Secretary

TIMOTHY P. MURRAY
Lieutenant Governor

LAURIE BURT
Commissioner

July 3, 2008

Steven Horn
Dominion Brayton Point, LLC.
P.O. Box 440
Somerset, Massachusetts 02726-0440

RE: Approval with Conditions
Application for: BWP SW 24 Corrective Action Alternative Analysis
Transmittal Number: W219111

AT: Brayton Point Station
Brayton Point Road
Somerset, MA
Facility Identification # 402959

Dear Mr. Horn:

The Massachusetts Department of Environmental Protection (the "MassDEP") has completed its technical review of the Corrective Action Alternative Analysis ("CAAA") permit application to address the presence of oil ash impacted sediments in Fox Hill Cove adjacent to Brayton Point Station. The permit application was prepared on behalf of Dominion Brayton Point, LLC (the "Applicant") by Roux Associates of Burlington, Massachusetts and submitted on April 23, 2008 to MassDEP. On June 10, 2008, MassDEP determined the Application was administratively complete and accordingly began its technical review. MassDEP has determined the permit application is technically complete and hereby approves the Corrective Action Alternative Analysis subject to the conditions specified herein.

I. SUBMITTALS:

MassDEP has reviewed the permit application (the "Application") pursuant to 310 CMR 19.000 Solid Waste Regulations, 310 CMR 19.150 Landfill Assessment Requirements and MassDEP's Landfill Technical Guidance Manual, May 1997 (the "Manual"). The Application consists of the following:

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057, TDD# 866-539-7622 or 617-574-6868.

DEP on the World Wide Web: <http://www.mass.gov/dep>

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- A. The permit application transmittal, application form for a Corrective Action Alternative Analysis (BWP SW24) and documents received by MassDEP on April 23, 2008 prepared by Roux Associates of Burlington, Massachusetts.

II. COMPREHENSIVE SITE ASSESSMENT CONCLUSIONS - FOX HILL COVE:

Brayton Point Power Station is a fossil fuel powerplant that is located on approximately 250-acre parcel of land surrounded by: the Taunton River to the east, the Lee River to west, Mount Hope Bay to the south, and Fox Hill Cove to the north. Fox Hill Cove area encompasses approximately 16.5 acres. Fox Hill Cove is a tidal embayment of the Lee River. In November 2006, the Applicant submitted a Comprehensive Site Assessment (CSA) for Brayton Point Station Landfills Cells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 10A (excluding Cell 1A) to MassDEP for review. Cell 1A is being addressed under the Massachusetts Contingency 310 CMR 40.0000.

In an October 26, 2007, letter MassDEP approved the Comprehensive Site Assessment permit application for the ash landfills cells and required the Applicant submit a CAAA permit application to MassDEP to address the presence of heavy metals detected in sediments within Fox Hill Cove. MassDEP limited the CAAA scope to analyzing options for corrective actions to eliminate or mitigate the potential impact caused by the oil ash contaminated sediments in Fox Hill Cove.

The source of the heavy metals in the sediments within Fox Hill Cove was determined to most likely be from the discharge from the historical ash settling ponds. Prior to the adoption of the solid waste regulations and the construction of the lined landfill cells at the property, coal ash was used on the property as fill or disposed of at off-site landfills. From 1963 to 1970 oil and coal ash were managed in the northern portion of the property in the vicinity of the current oil ash cells. Coal ash was disposed and stored on the northern half of the property. Oil ash was treated in the historical ash settling ponds, discharged from the former ash settling ponds to Fox Hill Cove, and placed in the on-site lined landfill cells. As part of the ash recovery system, a series of three unlined ash-settling ponds were constructed and operated between approximately 1969 and 1975. These ponds were used as part of a historical wastewater treatment system for settling out oil ash prior to the discharge of treated wastewater to Fox Hill Cove.

Beginning in 1979, eleven (11) lined landfill cells (Cells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 10A) were constructed pursuant to the Massachusetts's solid waste regulations. Cells 1, 2, 3, 4, 5, 6, 7, and 8 are located on the western perimeter near the Lee River. Each of these eight (8) cells is approximately one half acre in size, and each cell is lined, closed and capped. Cell 9 is a lined, closed and capped oil ash landfill cell that is approximately 1.5 acres in size. Cell 9 is located in the northwestern portion of the site adjacent to Fox Hill Cove. Cell 10 and 10A are located in northeastern portion of the site and have a combined footprint of five (5) acres. These two (2) cells (i.e. 10 and 10A) are the only active landfill cells at the Brayton Point Station.

III. CORRECTIVE ACTION ALTERNATIVE ANALYSIS:

The Applicant is requesting approval of the CAAA and recommended corrective action for Fox Hill Cove. Two (2) alternatives were evaluated as part of the CAAA application:

1. No Action; and
2. Excavation and off-site disposal of oil ash impacted sediments and restoration of the wetlands of Fox Hill Cove.

Source, Nature and Extent of Contaminants in Sediments: The primary source of heavy metals in the sediments within Fox Hill Cove is the residual oil ash from the former ash settling ponds and the historical discharge point into Fox Hill Cove. Vanadium was selected as the contaminant of concern that best describes the extent of contamination in the sediments. The vanadium concentrations in the sediments on the site range from 220 to 2800 ppm. The highest observed concentration of vanadium in sediment was collected from the vicinity of the historic discharge from the former ash settling ponds in Fox Hill Cove. Vanadium and other heavy metals were detected in sediments beneath a root mat approximately four (4) to six (6) inches thick and approach background concentrations at a depth of 1 foot below the bottom of the root mat.

As part of the CSA investigation, a Stage II Ecological Risk Characterization was performed. The consultant summarized the Risk Characterization for the site within the CSA. The consultant presented the following conclusions:

"Ecological conditions including species diversity and abundance are indicative that Fox Hill Cove is functioning as would be expected in the absence of any contamination and, therefore, there is no visible evidence of biologically significant harm. Fox Hill Cove was identified as the largest and most well developed marsh in the Lee River Ecosystem."

"Observations of wildlife indicate that Fox Hill Cove supports a diverse assemblage of wildlife and the benthic species. The habitat survey found that Fox Hill Cove and its surrounding habitats provide extensive cover, foraging, breeding resources for a diverse variety of birds, mammals, reptiles, and amphibians and that the use of the area by many of the species is high."

"An indication of the potential for biologically significant harm was predicted for birds, other than waterfowl, that consume soil invertebrates in the freshwater portion of Fox Hill Cove. The term "potential" is used when effects are predicted from measurements or models. An indication of potential for biologically significant harm does not mean that any harm is actually occurring."

"No significant risk of harm was predicted for any species inhabiting the salt-water marsh of Fox Hill Cove. No significant risk of harm was also predicted for carnivorous mammals that consume small mammals, for small mammals that consume freshwater plants, and for waterfowl and small mammals that consume plants and soil invertebrates in the freshwater wetlands. The weight-of-evidence approach for environmental risk assessment indicates that there is likely no significant risk of harm to other mammals such as shrews in the freshwater wetlands."

Field observations by the Applicant and MassDEP's wetlands staff indicate that Fox Hill Cove is a functioning wetland with no evidence of harm.

Evaluation of Alternatives: The Applicant selected the "1. No Action" alternative. The Applicant determined that no action alternative was the least intrusive activity and would not require the present functioning wetland habitat to be destroyed and restored. The Applicant states that "...it is our opinion that the documented biological abundance and diversity within Fox Hill Cove and the observed functionality of the wetlands take precedence over the food chain modeling..." results presented in the CSA. The Applicant proposed post closure monitoring of groundwater in the vicinity of the existing landfill cells, as well as post closure maintenance of the closed landfill cells. Additionally, MassDEP is requiring monitoring of surface water within Fox Hill Cove during the post closure-monitoring period (refer to condition #4).

As a second alternative, the excavation and off-site disposal of oil ash impacted sediments and restoration of the wetlands associated with Fox Hill Cove was evaluated by the Applicant. The excavation and restoration alternative would require:

1. a vegetation survey and inventory,
2. permitting by local conservation commission and MassDEP,
3. construction of a temporary dam to facilitate clearing and grubbing of a majority of the 16.5 acre area,
4. excavation and off-site disposal of approximately 1.5-feet of soil, root mass and sediments resulting in 40,000 yd.³ of material,
5. backfilling and vegetation planting,
6. habitat monitoring.

The Applicant evaluated both alternatives in accordance with MassDEP's Manual. Each alternative was evaluated for its 1) protectiveness, 2) ability to comply with state, federal and local laws, 3) long-term effectiveness, 4) reduction of contaminant toxicity to acceptable values, 5) implementability, and 6) costs.

The advantages of implementing alternative 2, identified in the Application, would be the reduction of contaminant concentrations in sediments to background and expected decrease in contaminant concentrations in surface water. The disadvantages of this alternative are the long-term effectiveness of the restored wetland area would be unknown for many years. The restoration may not result in a similar diversity and abundance of species as currently exists. Alternative 2 would be difficult and time-consuming to implement and the cost would be significant. The costs associated with this alternative that are estimated to be in excess of \$10,000,000.

The Applicant recommended the No Action alternative since the current condition of Fox Hill Cove does not pose a significant risk to human health, welfare or the environment, the costs associated with the excavation and restoration alternative is excessive and disproportionate to the limited additional benefits.

IV. APPROVAL CONDITIONS:

In accordance with its authority granted pursuant to M.G.L. c.111, s. 150A, and 310 CMR 19.000, MassDEP hereby approves the Corrective Action Alternative Analysis permit application and the proposed No Action alternative subject to the following conditions:

1. **Permit Limitations:** This Approval is limited to the Corrective Action Alternative Analysis permit application to address the presence of heavy metals attributable to oil ash in Fox Hill Cove. MassDEP reserves the right to require additional assessment or action, as deemed necessary to protect and maintain environment free from objectionable nuisance conditions, dangers or threats to public health or the environment.
2. **Regulatory Compliance:** This Approval does not relieve the Applicant, from the responsibility to comply with all other regulatory permitting requirements. The Applicant shall fully comply with all applicable local, state and federal laws, regulations and policies, by-laws and ordinances. Applicable state requirements include, but are not limited to, *310 CMR 19.043 Standard Conditions*. Applicable federal requirements include but are not limited to 29 CFR part 1910 OSHA standards governing employee health and safety in the workplace.
3. **Maintenance and Monitoring:** The Applicant shall continue to conduct environmental monitoring and maintenance in accordance with *310 CMR 19.142 Landfill Post Closure Requirements* and MassDEP's October 26, 2007 CSA permit approval letter, as modified herein (**refer to condition #4**). The Applicant shall maintain and repair environmental monitoring network in accordance with *310 CMR 19.133 Maintenance of Environmental Control and Monitoring System*.
4. **Surface Water Monitoring Fox Hill Cove:** The Applicant shall conduct surface water monitoring in accordance with the following plan:
 - a) The following two (2) surface water-monitoring locations (FXIMSW03 and FXIMSW-10) shall be sampled semiannually (every six (6) months).
 - b) Surface water samples shall be analyzed for the following parameters:
 - dissolved metals (antimony, arsenic, beryllium, iron, manganese, nickel, selenium and vanadium),
 - hardness,
 - field parameters (dissolved oxygen, pH, specific conductance and temperature).
 - c) The Applicant shall compare surface water sampling results to background values and appropriate benchmarks such as Massachusetts Surface Water Quality Standards promulgated at 314 CMR 4.00 and National Recommended Water Quality Criteria published by EPA pursuant to section 304(a).
 - d) All surface water reports must be submitted within **sixty (60) days** of sampling and include summary tables of analytical data, a site map showing all monitoring locations, and a discussion of the results (**refer to 310 CMR 19.132(1)(f)**).

RIGHT OF APPEAL

Right to Appeal – This approval has been issued pursuant to M.G.L. Chapter 111, Section 150A, and 310 CMR 19.037: Review Procedures for Permit Modifications, Permit Renewals and other Approvals, of the “Solid Waste Management Regulations”. Pursuant to 310 CMR 19.037(5), any person aggrieved by the issuance of this determination may file an appeal for judicial review of said decision in accordance with the provisions of M.G.L. c. 111, § 150A and M.G.L. c. 30A not later than thirty (30) days following receipt of the final permit. The standing of a person to file an appeal and the procedures for filing such an appeal shall be governed by the provisions of M.G.L. c. 30A. Unless the person requesting an appeal requests and is granted a stay of the terms and conditions of the permit by a court of competent jurisdiction, the permit decision shall remain effective or become effective at the conclusion of the thirty (30) day period.

Notice of Appeal - Any aggrieved person intending to appeal a grant of a permit to the Superior Court shall first provide notice of intention to commence such action. Said notice of intention shall include the Department file number (W219111) and shall identify with particularity the issues and reason why it is believed the permit decision was not proper. Such notice shall be provided to the Office of General Counsel of the Department and the Regional Director for the regional office which processed the permit application at least five days prior to the filing of an appeal.

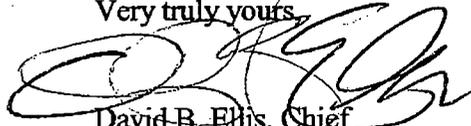
Office of General Counsel
Department of Environmental Protection
One Winter Street
Boston, MA 02108

David Johnston, Acting Regional Director
Department of Environmental Protection
20 Riverside Drive
Lakeville, MA 02347

No allegation shall be made in any judicial appeal of a permit decision unless the matter complained of was raised at the appropriate point in the administrative review procedures established in 310 CMR 19.000, provided that a matter may be raised upon a showing that it is material and that it was not reasonably possible with due diligence to have been raised during such procedures or that matter sought to be raised is of critical importance to the environmental impact of the permitted activity.

Please direct any questions regarding this matter to me at (508) 946-2833 or to Mark Dakers at (508) 946-2847, or write to the letterhead address. Refer to Transmittal Number W219111 in any correspondence to this office regarding this project.

Very truly yours,



David B. Ellis, Chief
Solid Waste Management Section

E/MD

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ec: DEP-SERO
ATTN: Gerard Martin (RTN 4-13169)
Ellie Grillo
Chris Tilden

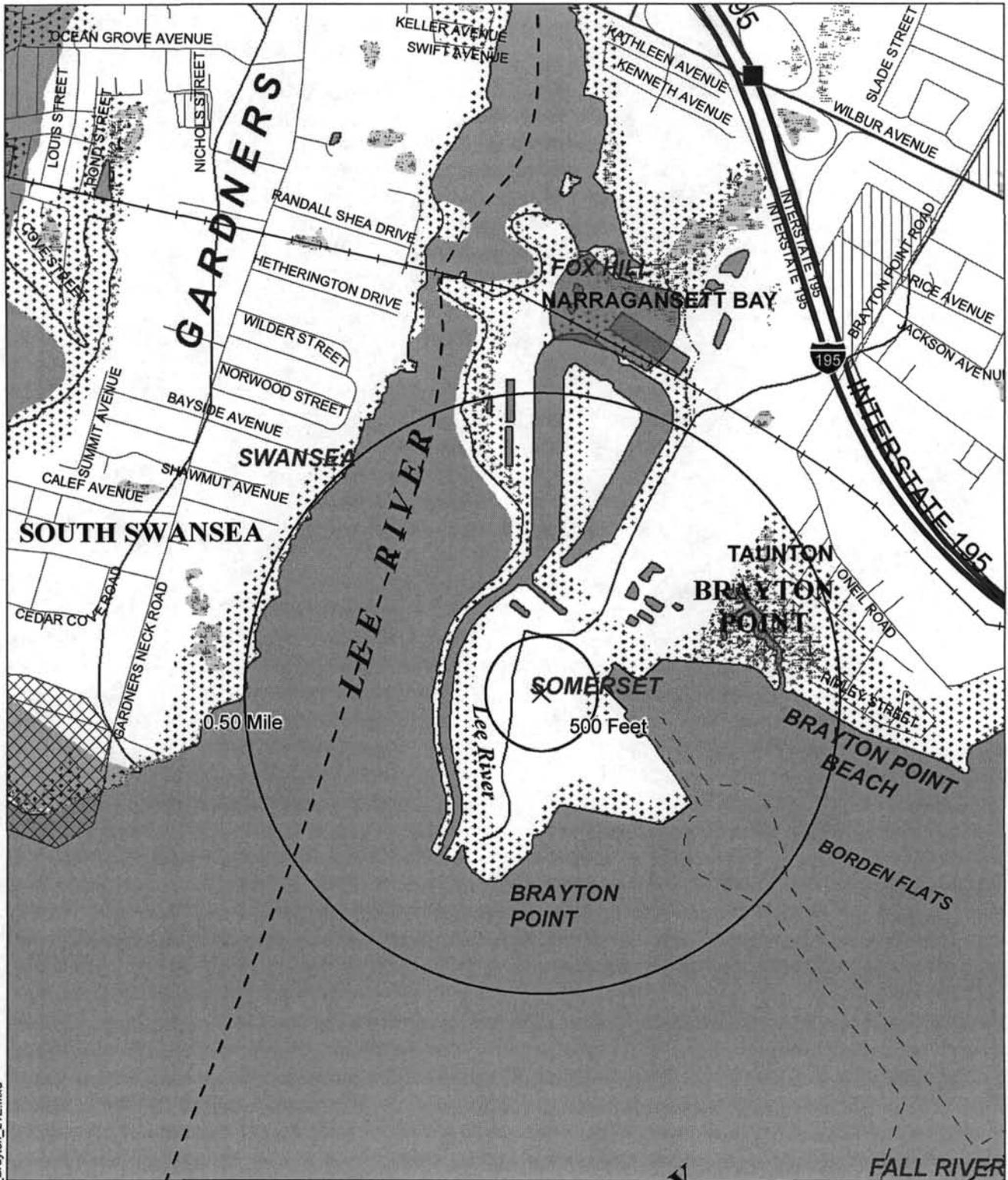
DEP-Boston
ATTN: J. Doucett

fc: Roux Associates, Ian Phillips
(fax 781-270-9066)

Somerset Board of Health
(fax 508-646-2802)

Conservation Law Foundation
(fax 617-350-4030)

Attachment E
Priority Resources Map



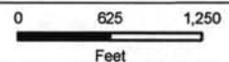
- Roads: Limited Access, Multi-Lane, Major/Minor
- Major Basin, Perennial Str, Int Str, Aqueduct, Dam, Channel in Water
- Wetland, Salt Wetland, Open Water, Reservoir
- Potentially Productive Aquifers: Medium, High Yield
- Non-Potential Drinking Water Source Area: Medium, High Yield
- EPA Sole Source Aquifer, FEMA 100 Yr. Floodplain, DEP Solid Waste Facility
- Public Water Supplies: Ground, Surface, Non-Community (NTNC, TNC)
- Approved Zone II, IWPA, Surface Water Supply Zone A
- Protected Open Space, ACEC, Certified Vernal Pool 2003
- Priority Habitat 2005, Rare Wildlife 2005
- Marsh/Bog, Wooded Marsh, Salt Marsh, Tidal Flat, Cranberry Bog, Beach/Dune

TRC

Boott Mills South
116 John Street
Lowell, MA 01852
978-970-5600

Source: MassGIS/EOEA

**FIGURE 3
DEP 21E PRIORITY
RESOURCES MAP**



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