

Cover Certification Report

**Pacer Headquarters, Inc.
Tax Map 10-1-2
112 Commerce Way
Woburn, Massachusetts 01801**

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1.0 INTRODUCTION

The Industri-Plex Site Remedial Trust (Remedial Trust) is required by the Consent Decree entered on April 24, 1989 by the United States District Court for the District of Massachusetts in the matter styled *United States v. Stauffer Chemical Company et al.*, Civil Action No. 89-0195-MC, and *Commonwealth of Massachusetts v. Stauffer Chemical Company et al.*, Civil Action No. 89-0196-MC, and recorded at the Middlesex South Registry of Deeds in Book 19837, Page 476 (Consent Decree) to fund and administer the obligations of the Consent Decree. At the request of the Remedial Trust, Roux Associates, Inc. (Roux Associates) has prepared this property-specific Final Cover Certification Report (Cover Certification Report) in compliance with the Consent Decree requirements. This Cover Certification Report documents completion of a portion of the Remedial Action for soil, sediments and air at the Industri-Plex Superfund Site (Industri-Plex Site), Woburn, Massachusetts. The specific property addressed in this report is owned by Pacer Headquarters, Inc. (Tax Map 10-1-2) and located at 112 Commerce Way in Woburn, Massachusetts. Construction of the Remedial Action for soil, sediment and air was completed on June 28, 1996. Changes to the cover at this property may have been made since that date. Approved changes to the cover are documented in the Administrative Record for the Industri-Plex Site.

In accordance with the Consent Decree and the Contract Documents for the Remedial Action, a certification report must be prepared by a registered professional engineer certifying that all remedial activities have been completed in full satisfaction of the requirements of the Consent Decree. As defined by the United States Environmental Protection Agency (EPA), (Federal Register, July 26, 1982) certification does not constitute a guarantee or warranty, but a “rendering of a professional opinion concerning compliance with a requirement of the regulations by a qualified professional in the field.”

1.1 Site Description and History

The Industri-Plex Site is a 245 (+/-) acre area, located about 10 miles northwest of Boston, Massachusetts in the north part of Woburn, within the Aberjona River Valley. The Site is bounded on the east side by Interstate 93, and Interstate 95/State Route 128 is located about one half mile south of the Site. The Boston Edison Power Company right-of-way No. 9 is the southwest boundary of the Site. The Massachusetts Bay Transportation Authority (MBTA) railway transects roughly the western third of the Site in a northwest-southeast direction. The

Industri-Plex Site was surveyed by SAIC Engineering, Inc. and Liu Aerial Surveys in 1990 and 1991.

Since the mid-1800s, the Industri-Plex Site has been used primarily by companies producing chemicals for textile, leather, and paper. Chemical manufacturing operations occurred at the Site from 1853 to 1931, producing sulfuric acid and related chemicals, arsenic insecticides, acetic acid, dry colors, phenol, benzene, picric acid, toluene and trinitrotoluene (TNT). By 1929, the Merrimac Chemical Company, which occupied the Industri-Plex Site, had become one of the leading producers of insecticides and other chemicals in the United States. The Merrimac Chemical Company plant included 90 buildings on 417 acres, many of which were within the current Industri-Plex Site. Early operations included disposal of wastes in pits or low-lying wetlands. Liquid wastes were discharged into streams and later sewers. As a result, heavy metal wastes from the chemical operations contaminated Site soils and wetland sediments.

From 1934 to 1969, the property was used by several companies to manufacture glues and gelatins from animal hides. Raw, salted or limed hides, hide fleshings, or chrome tanned leather scraps from cattle, hogs, sheep or other animals were used to manufacture glue by extracting a protein called collagen from animal tissues or bones. Animal hide waste products from the rendering process were disposed of in mounds or hide piles on-Site. A developer purchased the plant property in the early 1970s intending to build a complex of industrial buildings (hence Industri-Plex) and began grading operations. During hide pile excavation, noxious gases and odors, attributable to the decomposing hide wastes, were released. The distinctive odor became known as the “Woburn odor.” Complaints from local residents and encroachment on wetland areas stopped further development of the Site.

In 1981, the EPA proposed the Industri-Plex Site for the National Priorities List (NPL), also known as Superfund. The Industri-Plex Site was finalized on the NPL in 1983. In May 1982, EPA and the Massachusetts Department of Environmental Quality Engineering [DEQE – currently known as the Massachusetts Department of Environmental Protection (MassDEP)] entered into a Consent Order with Stauffer Chemical Company to undertake a Remedial Investigation/Feasibility Study (RI/FS). In April 1985, Phase II of the RI/FS was completed. The Remedial Investigation identified arsenic, lead, and chromium in Site soils and wetland

sediments as well as impacts to the ground water and odors due to hydrogen sulfide and methyl mercaptans emitted from the hide piles. Abandoned buildings and waste lagoons were also present on the Site. Based on the RI/FS, EPA, along with MassDEP, established a Record of Decision (ROD) in 1986 for the first phase of the cleanup at the Industri-Plex Site (known as Operable Unit 1, OU-1), which included a protective cover over more than 100 acres of soil contaminated with heavy metals and animal wastes, a gas collection and treatment system, institutional controls, an interim groundwater remedy, as well as further investigations of Site-related contamination at and downstream of the Site to support a future second phase (known as Operable Unit 2, OU-2). The location of the protective cover is illustrated in **Attachment 1**, which includes an impermeable cover for the gas collection and treatment system situated at what is known as the East Hide Pile.

Further details of the Industri-Plex Site history can be found in the 1986 Record of Decision.

In a 1989 Consent Decree between EPA, MassDEP and the current and former property owners, two Trusts were established which set in motion the remediation and reuse of the Industri-Plex Site. The Remedial Trust was formed to prepare and implement the remedy according to the ROD. The Industri-Plex Site Custodial Trust (Custodial Trust) was formed to hold, manage, and sell a portion of the Site.

Golder Associates, Inc. was selected in 1989 by the Remedial Trust to design the remediation for the Industri-Plex Site. The remedial design included pre-design investigations of the soils, wetlands, air, and groundwater.

The pre-design investigations included sampling analysis and studies to determine the extent of contamination and, in accordance with the Consent Decree, to evaluate cover types. Designs were needed to prepare the ground surface for cover. The remedial design included:

1. Plans for the demolition or decommissioning of abandoned buildings, railroad tracks, underground utilities, a personnel tunnel, and over 120 existing observation wells and piezometers used during the preliminary investigation.
2. Plans for controlling odors, fugitive dusts, and surface water runoff during construction to prevent off-Site impacts.

3. Evaluation of, and considerations for the future stability of, the hide pile slopes.
4. Plans for collecting and treating waste gases in a Thermal Oxidation Unit.
5. Plans for dredging, remediating, and revitalizing streams and wetlands.

The remedial design for contaminated soils and air included both permeable (soil and geotextile) and impermeable (soil and geomembrane) covers. A permeable cover system was designed for 60 acres of upland soils and three hide piles (known as the West, East-Central, and South Hide Piles) contaminated with high concentrations of heavy metals and decomposing organic wastes. The permeable cover included a geotextile base to maintain separation between contaminated soils and clean cover material, a clean grading fill, and topsoil with vegetation. An impermeable cover was designed for a fourth hide pile (known as the East Hide Pile) which was approximately four acres in size and an active odor source. The impermeable cover included a high permeability gas collection layer, geomembrane, cover grading fill, topsoil, and vegetation. An active gas collection system was designed to collect gases trapped by the impermeable cover and convey the gases to a Thermal Oxidation Unit for treatment. The permeable cover system for the Site was further divided into two categories: “Engineered Cover”; and “Equivalent Cover”. The Engineered Cover was designed and constructed by the Industri-Plex Site Remedial Trust as part of the response activities at the Site to prevent exposure to contaminated soil, and may be comprised of one or more of the following materials: geotextile, geomembrane, soil, gravel, bituminous concrete and/or asphalt. The Equivalent Cover represents existing structures serving as an adequate permeable cover. Equivalent Cover, although not designed as part of the Engineered Cover, functions to prevent exposure to contaminated soil, and may be comprised of one or more of the following ground covering structures or features, or portions of such structures or features: buildings; foundations; slabs; paved driveways, walkways, parking lots and/or roads; or other such ground covering structures or features. The location of Engineered and Equivalent Covers are illustrated in the Record Drawings.

Site remediation also required capping approximately five acres of contaminated streams and wetland sediment. Approximately seven acres of wetland enhancement, restoration, and creation were designed to compensate for wetland losses. Normandeau Associates, Inc. of Bedford, New Hampshire, was a key designer of the wetland mitigation plans.

A revised final (100%) Design Report was issued on May 8, 1992. Approval for the 100% Design Report was issued by EPA in consultation with the MassDEP on May 18, 1992. A Remedial Action Work Plan for Soil, Sediment and Air Remedy was issued on June 22, 1994, and approved by EPA, in consultation with MassDEP, on July 11, 1994.

1.2 Scope of the Remedial Action

The Remedial Action (RA) implemented the Remedial Design prepared by Golder and distributed for bidding in April 1992. The RA included covering metal-contaminated soils encountered over an approximately 100-acre portion of the 245-acre Site, a portion of which this property represents, as shown on Sheet B-36 of **Attachment 1**. This certification addresses the remedial action performed on the Pacer Headquarters, Inc. (Pacer) Property (Tax Map 10-1-2). The remedial action on this property included a designed permeable cover of clean soil and/or riprap overlying a geotextile layer that was placed on the South Hide Pile.

Work conducted between 1992 and December 1997 is addressed in this report.

This report includes the following information as it pertains to the remedial action performed on the Pacer Property:

- Relevant portions of the Final 100% Design Report (**Appendix A**);
- The submittal log (**Appendix B**);
- Modifications of specifications and plans (**Appendix C**);
- Results of Site air and surface water monitoring (**Appendix D**);
- Decommissioning of wells, piezometers, gas vents, and unidentified wells (UIDs) (**Appendix E**);
- Results of soil conformance and in-place material testing during the Remedial Action (**Appendix F**);
- Results of geosynthetics conformance material testing (**Appendix H**);
- Observations of subgrade preparation, and geosynthetic installation (**Appendix I**); and,
- Review of lines and grade control.

1.3 Report Format

This property-specific Cover Certification Report was derived from the Master Cover Certification Report documenting the completion of the soil, sediment and air remedies at the Site [excluding MassPort Authority property documented in the April 1998 Regional Transportation Center (RTC) Cover Certification Report]. Other property-specific Cover Certification Reports will be produced for the remaining properties at the Site. This property-specific Cover Certification Report presents a generic description of all work performed to complete the soil, sediment and air remedies, some of which are applicable to this property. For those portions/sections which are not relevant to this property-specific Cover Certification Report, those sections have been identified as “[Not Applicable to This Property]”. The Master Cover Certification Report contains property-specific details and record drawings for 31 Tax Map lots at the Site including additional general and Woburn Roads/Right of Way information. Please reference the Master Cover Certification Report for this additional Site-wide information.

2.0 PROJECT PARTICIPANTS

In July of 1989 Golder was retained by the Remedial Trust to prepare the Remedial Design for the Site. The Consent Decree included the Remedial Design/Remedial Action Plan (RDAP). The RDAP required the preparation of Pre-Design Investigations and a Remedial Design. The design was executed in accordance with the requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) as amended and re-authorized. From 1990 to 1992 Golder prepared Preliminary, Intermediate, Pre-Final, and Final Design Reports in conformance with the RDAP.

The Remedial Trust entered into an agreement with Chemical Waste Management, Inc. Remediation Services Group of Princeton, New Jersey, (CWM, also Contractor) to perform the RA in accordance with the RDAP and the Remedial Design plans and specifications. The name of the Contractor changed January 1, 1993 when CWM was acquired by Rust Remedial Services Inc. (Rust), then again in May of 1995 when OHM acquired Rust. The name Chemical Waste Management was retained as the legal name of the Contractor throughout the period covered by this report.

Several subcontractors assisted the Contractor with specific tasks during the remedial work. A list of the subcontractors and the services they provided is presented below:

- Rust Environment and Infrastructure, formerly SEC Donohue Inc., of Burlington, Massachusetts provided engineering support;
- Earth Tech Inc. (Earth Tech), formerly HMM Associates Inc., of Concord, Massachusetts provided surveying services from 1992 to 1993 and Meridian Land Services Inc. (Meridian) of Milford, New Hampshire provided surveying services from 1993 to 2001. Both surveying companies collected field documentation that would be used to establish the as-built drawings for this report;
- Eastmont Environmental Inc. of Walpole, Massachusetts conducted perimeter air monitoring;
- Beattie Enterprises of Lancaster, New Hampshire assisted with clearing and grubbing the Site;
- Maher Environmental Services (Maher), formerly D.L. Maher Company, of Reading, Massachusetts decommissioned the wells and piezometers;
- Barbella Environmental Technology Inc. of Whitehouse, New Jersey assisted in the hide pile remediation;

- Toxikon Laboratories, of Woburn, Massachusetts, and 21st Century Environmental Inc. of Bridgeport, New Jersey, assisted the Contractor with water and soil analytical testing; and,
- Reliable Fence Company of Woburn, Massachusetts installed chain link fence on the Site.

In accordance with the Consent Decree, EPA contracted with Halliburton NUS (HNUS) of Wilmington, Massachusetts to provide technical oversight. Representatives of EPA and MassDEP met with the Remedial Trust monthly (approximately) throughout the RA to oversee the performance of the work. Minutes of the meetings were recorded but are not included in this report.

Golder provided engineering quality assurance (QA) for the RA from September 1992 through December 1995. QA included examining and testing materials and procedures to verify and provide confidence to the Remedial Trust that the construction conformed to the requirements of the specifications and drawings. At the Remedial Trust's request, Golder also performed a geophysical investigation during May 1993. Golder provided on-Site construction management services for the Remedial Trust from March 1995 through December 1995.

The Remedial Trust contracted with Professional Service Industries, Inc. (PSI) of Canton, Massachusetts to perform soil moisture/density testing of compacted soils, soil laboratory testing, and asphalt testing. PSI also performed on-Site QA testing from August 1993 through December 1995.

During 1995, the Remedial Trust contracted with *de maximis, inc.* to be the Site manager for the Remedial Trust and to coordinate the work conducted by Golder, CWM, and other contractors. In 1998, the Site manager role was assumed by Maverick Construction Management Services, Inc. (Maverick). Following remedial construction activities, the Remedial Trust contracted directly with Maverick to coordinate the documentation of as-built cover conditions, to manage construction activities necessary to bring the cover into compliance with the 100% Design, and to prepare a Draft Cover Certification Report. In 2007, the Remedial Trust contracted with Roux Associates to complete the certification of the cover, including the completion of the draft and final Cover Certification Report.

3.0 CONSTRUCTION DOCUMENTS

RD/RA work performed for the Remedial Trust was completed according to the documents, plans, and specifications described in Sections 3.1 through 3.4.

3.1 Consent Decree

The Consent Decree (EPA, 1989) entered into between the Plaintiffs [*i.e.*, EPA and the MassDEP (Agencies)] and the Settlers defined the work that was to be undertaken at the Site. This definition is within the Consent Decree as well as the RDAP. The Consent Decree was based on the Record of Decision (ROD) for the Site (EPA, 1986). While the Consent Decree, the RDAP, and the ROD were consulted for the specific definition of the remedies to be implemented at the Site, the RDAP generalized the remedy and formed the basis for Golder's preparation of the Remedial Design Work Plan and ultimately the Final 100% Design Report. This certification applies to the Consent Decree but the primary component is the RDAP.

3.2 100% Design Report and Addenda

Golder developed the design and specifications and produced the Final "100% Design Report, Part I" for the Industri-Plex Site (**Appendix A**), which was submitted to EPA and MassDEP in December 1991. This report only applied to the remedy for soil, sediments and air for the Site. Other Consent Decree requirements were deferred in accordance with the Agencies' instructions. The Agencies provided comments on the 100% Design Report, and responses to those comments were submitted April 3, 1992. A revised final 100% Design Report was issued April 3, 1992. The 100% Design was issued for bid April 25, 1992. The 100% Design Report was approved on May 18, 1992.

Subsequent addenda were issued for the 100% Design Report including the following:

- Addendum 1 issued May 1992 (EPA/MassDEP Approval March 11, 1993)
- Addendum 2 issued June 1992 (EPA/MassDEP Approval March 11, 1993)
- Addendum 3 issued May 14, 1993 (EPA/MassDEP Approval May 27, 1993)
- Addendum 3 revision 1 August 27, 1993 (EPA/MassDEP Approval September 10, 1993)
- Addendum 3 revision 2 October 18, 1993 (EPA/MassDEP Approval November 2, 1993)

On October 1, 1996, EPA approved an alternative permeable cover design for the RTC entitled RTC Alternate Cover Design (Golder, 1996). Details of the construction and certification of the RTC Alternative Cover Design are presented in the RTC Cover Certification Report (Golder, 1998), which was approved by EPA on April 29, 1998.

3.3 Remedial Action Work Plan

According to the Consent Decree, the RA Work Plan (RAWP) was to be submitted to the Agencies within sixty (60) days after EPA and the Commonwealth received notification of the selected RA Contractor. The RAWP was prepared by the RA Contractor for the Remedial Trust to implement the Site remedy consistent with the approved design for each Site area. The Consent Decree required that the RAWP contain:

- “(1) A description of all the activities necessary to implement the RAs; and,
- (2) A timetable for the completion of all these activities, which shall also identify major and minor milestone events in the RA process. The schedule of significant events shall be consistent with Attachment D, [Project Schedule and Remedial Design/Action Milestones].”

On August 18, 1992, prior to EPA’s receipt, review, and acceptance of the RAWP, the Remedial Trust requested EPA and MassDEP approval of a preparatory, non-intrusive work plan for work that would begin in September. Submittal of this work plan allowed the Contractor to maximize the construction work season while awaiting final approval of the RAWP. An addendum to the August request was submitted to EPA and MassDEP on October 9, 1992 expanding the earlier request to include debris removal and non-intrusive work and above ground structure demolition. Both the August 18 and October 9 requests were tacitly approved by EPA, after consultation with MassDEP. As required, the Remedial Trust submitted a RAWP to EPA on October 5, 1992 (Consent Decree Attachment, Section B, Subsection 3B).

An interim RAWP was submitted to EPA on October 22, 1992 with a request to begin work west of the MBTA railroad tracks. EPA, after consultation with MassDEP, provided comments on the interim RAWP on November 25, 1992 and a revised interim RAWP was submitted to EPA in December 1992. With EPA and MassDEP concurrence, the Remedial Trust authorized the Contractor to begin remediation of the Site on December 2, 1992.

EPA's review of the original RAWP, after consultation with MassDEP, continued through the first half of 1993. EPA, after consultation with MassDEP, provided a conditional approval of the RAWP on March 11, 1993. The Agencies had two main concerns, 1) "the effect of the proposed groundwater treatment changes on the 'Created Wetlands' (CW); and 2) the maintenance of air and stream water quality (ARARs) during the construction of the Remedy." EPA, after consultation with MassDEP, requested the following: 1) a revised CW design with a buffer and separation from the groundwater; and 2) implementation of a program for surface water sampling for contaminants.

Following the Remedial Trust's responses, EPA, after consultation with MassDEP, presented an approval of the RAWP on May 19, 1993, contingent upon 1) sampling of surface water to measure water quality; 2) resolution of water treatment design questions; 3) provision of a copy of the Contractor drilling and blasting plan; and 4) a requirement to cover all frequently used roads with a minimum of 4 inches of crushed stone. On July 2, 1993, EPA, after consultation with MassDEP, and the Remedial Trust reached an agreement on procedures for testing surface water and revisions to the CW.

Erosion and sediment control issues prompted further revisions to the RAWP. On March 1, 1994, a major revision to the RAWP was submitted to EPA. EPA, after consultation with MassDEP, approved the revision July 11, 1994. Subsequent revisions were submitted and the latest version of the RAWP at the preparation of this report is August 21, 1995.

3.4 Health and Safety Plan

A Health and Safety Plan (HASP), prepared by CWM and dated August 1992, for the remediation of the Site was transmitted to EPA, after consultation with MassDEP, on September 2, 1992. The submission was made in fulfillment of the requirements to the Consent Decree Appendix I, Section F. The Remedial Trust was informed at the March 22, 1993 meeting that EPA, after consultation with MassDEP, would not approve the HASP but would provide comments. The HASP was revised on March 16, 1994; December 20, 1994; May 5, 1995; and June 29, 1995 largely to address changes to the Emergency Response Plan. In accordance with the Agencies' policy, the HASP was reviewed but not approved. The latest version of the HASP as of this report is June 29, 1995.

4.0 REMEDIAL DESIGN/ACTIONS

4.1 Soil Remedy

The soil remedy for the majority of the Site involved covering on-Site soils containing lead, arsenic, or chromium at or above the action levels established by the Consent Decree with permeable soil cover. An impermeable cover was designed for a four-acre hide pile (East Hide Pile) on Site which was an active odor source. The Pacer Property (Tax Map 10-1-2), however, does not include the East Hide Pile and therefore required only permeable soil cover.

4.1.1 Soil Remedy - Consent Decree Requirements

The RDAP is included as Appendix I of the Consent Decree. Throughout the RDAP, the remedy for the Site is referred to as the “cap”. However, the 100% Design refers to the Site remedy as the “cover”. The term “cover” has been retained for the text of this report, excluding the RDAP.

Page 1 of the RDAP states the following:

“The remedial action for soils, sediments, and sludges contaminated with Hazardous Substances, other than those emitting odors (the East Hide Pile), shall include site grading, capping with a permeable soil cover, excavation, dredging, and/or consolidation for all areas containing Hazardous Substances at concentrations above established action levels (arsenic = 300 ppm, lead = 600 ppm, chromium = 1,000 ppm)...”

Furthermore the RDAP states, “Settlers shall design and implement remedial action for soils contaminated with Hazardous Substances above the action level for metals that shall consist of site grading and capping together with Institutional Controls. Areas already covered adequately by buildings, roadways, parking lots, or other ground covering features, would not receive cover material, instead allowing the structures themselves to act as the protective cap.

For small areas on-Site, such as the landscaped areas between buildings and parking lots, Settlers may propose location-specific alternatives to capping consisting of excavation of contaminated soil and consolidation on-site with similarly contaminated soils, or placement of a protective layer such as asphalt to cap the contaminated soils.

Settlers shall design and implement the remedial actions for contaminated soils in accordance with the following requirements:

(1) cap design and construction activities shall be in accordance with regulations and/or guidance on cap design for permeable covers as summarized in [RDAP] Attachment A ... provided that an alternative permeable cap design including a permeable synthetic fabric and a soil layer less than 30 inches in depth, may be used in all areas of the Site where Settlers demonstrate to EPA and the Commonwealth that the alternative cap design will perform as well as or better than the permeable cap design summarized in Attachment A.”

Attachment A to the RDAP states that:

“Permeable covers shall be designed and constructed to include at a minimum the following:

A. A vegetated top layer which shall be:

1. of a minimum thickness of six (6) inches;
2. capable of supporting vegetation that minimizes erosion and minimizes continued maintenance;
3. planted with a persistent species with roots that will not penetrate into the contaminated soils;
4. designed and constructed with a top slope of between 3 percent and 5 percent after settling and subsidence or, if designed and constructed with less than 3 percent, a drainage plan to ensure that the ponding of surface water does not occur or, if designed and constructed with a slope of greater than 5 percent, an expected soil loss of less than 2 tons/acre/year using the USDA universal soil loss equation; and,
5. designed and constructed with a surface drainage system capable of conducting effective run-off across the cap.

B. A base layer that shall be:

1. of a minimum thickness of twenty-four (24) inches of appropriate fill material; and
2. designed and constructed to prevent clogging.”

Two alternative permeable covers were designed as part of the remedy under the Consent Decree. The first alternative permeable cover design concept utilizing a 16-inch thick borrow cover overlaying a geotextile was developed in the Alternative Cover Design Report (Golder, 1989). This design was subsequently approved by the EPA and MassDEP in a letter dated September 11, 1989. The second alternative permeable cover design was the design to accommodate the RTC Alternative Cover (VHB/Golder, 1996). The EPA, in consultation with the MassDEP, approved the RTC Alternate Cover design in a letter dated October 1, 1996. The RTC Alternative Cover was properly constructed and documented in the RTC Cover Certification Report (Golder, 1998), approved by EPA on April 28, 1998.

4.2 Sediment Remedy [Not Applicable To This Property]

4.3 Air Remedy [Not Applicable To This Property]

5.0 SITE CONTROLS AND DOCUMENTATION

5.1 Survey Control

The Contractor utilized Meridian and Earth Tech to provide record survey documentation of the extent of cover, configuration of grading and general as-built conditions of the cover and any buried or concealed construction. The results of these record surveys are provided in **Attachment 1** (Sheets B-36 through B-40). The record drawings are based on the survey control provided in the 100% Design Report plans.

5.2 Construction Control

During the RA work, the Contractor was required by the project specifications to provide controls to maintain a safe work environment and protect the public health and safety. Such controls included air monitoring and surface water monitoring (**Appendix D**).

Air Monitoring

The objective of the ambient air monitoring program was to monitor total reduced sulfur (TRS) compounds and total suspended particulate (TSP) and inhalable particulate (PM10) as well as heavy metals (arsenic, lead and chromium) in TSP at fence line locations during remediation efforts.

Specification section 01562 - Dust Control of the 100% Design Report required the contractor to employ construction methods and means that would keep airborne particulates below the following action levels:

- PM10 particulates were to be limited to an annual average of less than 150 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) at Site monitoring points; and,
- Respirable dust concentrations were limited to $90 \mu\text{g}/\text{m}^3$ at Site monitoring points and $5,000 \mu\text{g}/\text{m}^3$ in the worker's breathing zone.

Data gathered by dust monitoring devices was used to monitor metals in the particulates to ensure that they were below the following threshold limit values (TLVs) outlined in the American Council of Governmental and Industrial Hygienists:

Arsenic	Chromium	Lead
0.02 µg/m ³ (of air)	1.36 µg/m ³ (of air)	1.36 µg/m ³ (of air)

Appendix B to Volume 6 of the 100% Design Report provides a detailed Odor Control Plan which specifies that TRS compounds in air at the perimeter of the Site may not exceed 47 parts per billion (ppb).

Eastmount Environmental Inc. (Eastmount Environmental) conducted ambient air quality testing, beginning in September 1992. The particulates and heavy metals were sampled at four perimeter monitoring locations. TRS sampling was conducted at seven perimeter monitoring locations. See **Appendix D.1** for a map indicating sample points.

TSP and PM10 Sampling

TSP and PM10 samples were collected using Hi-Volume samplers. Each Hi-Volume sampler was programmed to sample at each of the four sample locations from midnight to midnight on six day intervals. In addition to the four sample locations, a duplicate TSP sampler was stationed at Location 4 and a duplicate PM10 sampler was stationed at Location 2. The duplicate TSP sample was also analyzed for metals (arsenic, chromium, and lead).

Eastmount Environmental prepared Hi-Volume Sampling Summary reports. The Summary of Hi-Volume Results tables from those reports issued for periods during performance of work on the RA are included in **Appendix D.1**. Analytical results showed levels of TSP, PM10, and metals below the action levels.

TRS Sampling

The ambient TRS sampling was conducted using a Photovac 10S Plus portable gas chromatograph capable of measuring odorous sulfur compounds in the low part per billion range. Ambient TRS sampling was conducted twice a week from the beginning of the sampling program up until December 1992. After that, the sampling frequency was reduced to once every six days.

Eastmount Environmental prepared Ambient Air Sampling Summary reports. The Summary of Ambient TRS Results tables from those reports issued for periods during performance of work on the RA are included in **Appendix D.1**. The majority of TRS results were non-detects. Hydrogen sulfide was detected on a few occasions; however, there were no exceedances of the 47 ppb action level.

Surface Water Monitoring

CWM was also required to monitor surface water during remedial activities. According to the Site Surface Water Monitoring Plan (RAWP, Section 5.2), the following Ambient Water Quality Control (AWQC) concentrations were used as the response action levels for the Industri-Plex Site:

- AWQC chronic concentration for arsenic = 0.190 milligrams per liter (mg/L);
- AWQC chronic concentration for chromium = 0.210 mg/L; and
- AWQC acute concentration for lead = 0.082 mg/L.

The above-tabulated AWQC limits correspond to a hardness of 100 parts per million (ppm). Water hardness values on-Site indicated moderately hard to very hard conditions (EPA, 1986). Historical background surface water data collected from surface water drainways periodically contained lead concentrations of 0.025 mg/L. Since these background levels routinely exceeded the threshold value of the AWQC chronic concentration for lead, the AWQC acute concentration was approved on June 8, 1994 as the response action level by MassDEP and EPA.

Surface water sampling was conducted to meet the project specifications and the RAWP requirements. The surface water controls established by EPA and included in the Contractor's RAWP required the following procedures:

- Each work day, field measurements were conducted at various stations (whenever there was flow) for turbidity, dissolved oxygen, temperature, specific conductivity, and pH. The sample from each station with the highest turbidity during the week was submitted for laboratory analyses of total and dissolved arsenic, lead, and chromium, total suspended solids (TSS), and hardness. Any sample with a turbidity greater than or equal to 85 nephelometric turbidity units (NTU) was also submitted for the same laboratory analyses.

- Additional sampling was conducted if a storm and/or a construction event caused the turbidity to rise above 85 NTU at the monitoring stations. The samples were analyzed for total and dissolved metals (arsenic, chromium, and lead), TSS, and hardness. Field measurements for turbidity, dissolved oxygen, temperature, specific conductivity, and pH were conducted at the time of sampling.

HMM conducted surface water quality sampling as a subcontractor to CWM. Test results indicated that the surface water quality remained below the response action thresholds with the exception of exceedances as listed in **Appendix D.2**. Specific reasons and mitigating actions for each exceedance are described in the Quarterly Reports of 1993-1995. Generally, the Agencies were notified and the mitigating actions were performed to the satisfaction of the Agencies.

5.3 Decontamination

CWM was required to decontaminate all equipment that came in contact with contaminated soils, sediments, and sludges during the work. Water used during the pressure washing was collected and treated at the on-Site storage areas. The decontamination was performed in accordance with the specifications and the project work plans. Water generated from decontamination activities was stored in a Modu-tank on the east side (across the MBTA rail lines) of the Site. The water was treated and properly disposed of on-Site as approved by the Agencies.

Personnel entering work areas (exclusion zones) during the remedial action wore protective equipment as specified by CWM's HASP. The HASP also specified personal decontamination procedures. All personnel leaving work areas were required to properly clean or dispose of all protective equipment, small tools, and instruments.

5.4 Facility Documentation for Off-Site Disposal

Prior to disposing of any materials off-Site during the RA, EPA was to determine if the proposed facilities were of "acceptable status" and could receive materials from the Site. Only non-hazardous vegetation (cleared/cut above ground surface) was disposed off-Site during the RA. During the work, as previously discussed, wastewater from decontamination activities was stored on the east side of the Site and treated prior to disposal.

All grubbed vegetation (containing soil), and contaminated soil, sediments, and sludges excavated from the Site were consolidated in other areas of the Site in accordance with the

RDAP. All contaminated materials excavated from the Site were placed on the hide piles that were covered as part of the approved RA. However, prior to placement on the hide piles, saturated sediments and sludges were dried over large areas east of the MBTA rail lines on the Site within the remedial cover area.

6.0 SOURCE AND CONFORMANCE TESTING

Testing performed for the Remedial Trust, such as testing of soil and soil products and geosynthetics, is described in Sections 6.1 and 6.2, respectively. The testing methods according to the specifications are summarized in **Table 2** [*i.e.*, Golder's Quality Assurance Procedure Plan (QAPP) Table 1-1]. Abbreviations used in the supporting documentation found in the appendices are summarized in **Table 3**.

6.1 Soil and Soil Products

6.1.1 Compacted Fill

The majority of compacted fill materials were derived from on-Site grubbing and dredging operations. Compacted fills were used as stabilizing fill to flatten hide pile slopes and re-grade low relief areas to promote drainage. A portion of rock and concrete demolition debris generated by crushing and screening operations was also used to a limited degree as compacted fill material. The remaining compacted fill was imported from off-Site borrow areas. Most of the off-Site fill was composed of silty sand from a quarry in Hubbardston, Massachusetts and glacial till from a borrow pit on Deer Island, Boston Harbor, Massachusetts. Compacted fill tests included grain size distribution and primarily Standard Proctor tests with some Modified Proctor tests as needed.

6.1.2 Cover Soil

All cover soil used on-Site was from off-Site sources. Cover soil placed on slopes flatter than 8 horizontal to 1 vertical (8H:1V) was typically a granular silt from a glacial till deposit on Deer Island. Cover soil placed on slopes steeper than 8H:1V and some slopes flatter than 8H:1V was a silty sand from a quarry in Hubbardston. Cover soil tests included grain size distribution, Standard and Modified proctor densities, interface friction, and Atterburg Limits. Results of the testing are provided in **Appendix F**. Analytical testing was performed on Deer Island cover soil materials to verify the levels of potential contaminants. All soil materials tested and placed on-Site met the clean soil thresholds set up by EPA, after consultation with MassDEP, or were otherwise approved by a variance in accordance with EPA, after consultation with MassDEP, criteria. EPA, after consultation with MassDEP, clean soil threshold criteria for cover soil used at the Site are summarized in **Table 1**. Analytical test results are provided in **Appendix F.1**.

6.1.3 Topsoil

According to the Consent Decree, topsoil must be capable of supporting vegetation that minimizes both erosion and continued maintenance. Topsoil used for the cover in upland areas and as a wetland vegetative cover soil came from several off-Site sources. Such source locations were from the following Massachusetts towns: Andover, Reading, Salem, and Tewksbury. Other topsoils were sourced from the following New Hampshire towns: Nashua, New Boston, and Manchester. Each source was tested for grain size distributions, organic content, and soil fertility or Baker Soil test. Results of testing are provided in **Appendix F.2.3**. Where the topsoil did not meet some criteria, but would be capable of meeting the Consent Decree requirement for being capable of supporting vegetation, a variance was requested and received from EPA, after consultation with MassDEP.

6.1.4 Subangular Stone

There were several varieties of subangular stone required by the 100% Design Report. Each of the subangular stone materials was a product of off-Site crusher/screener operations from PJ Keating Company of Lunenburg, Massachusetts or Bardon Trimount Inc. of Burlington, Massachusetts. The products required for the RA included American Association of State Highway and Transportation Officials (AASHTO) No. 8, the stone used in the gas collection layer material; AASHTO No. 57, a variety of stone used for bedding and armoring purposes; and both AASHTO 2 and 67, stone materials used in sediment filter construction. Testing of these stone materials consisted of the following: grain size, permeability, and carbonate content. Testing was performed on a per source basis unless the Remedial Trust requested additional testing. Test results are provided in **Appendix F.2.2**.

6.1.5 Stone Riprap

Two average sizes of stone riprap ($d_{50} = 6$ -inch and $d_{50} = 3$ -inch by weight) were required by the 100% Design Report. Each of the riprap stone materials was produced at off-Site crusher/screener operations owned by PJ Keating Company of Lunenburg, Massachusetts or Bardon Trimount Inc. of Burlington, Massachusetts. Both types of stone riprap were used as gravel/cobble lining for remediated drainways and hide pile toe drain construction. The 6-inch riprap was also used in permanent erosion control features and as gabion backfill material. Testing of the riprap included a test for abrasion, freeze-thaw susceptibility, and specific gravity. Gradation tests were also reviewed. Stone riprap materials were tested once per source area

unless the Remedial Trust requested additional testing. The stone riprap test results are presented in **Appendix F.2.2**.

6.1.6 Subbase

Road Structural Fill as specified in Section 02223 was used as subbase in the RA. Tests for the subbase material included gradation and compaction. All subbase materials were supplied by an off-Site quarry. Test results are provided in **Appendix E.2.1**.

6.2 Geosynthetics

6.2.1 Geotextile

6.2.1.1 Materials

Geotextile materials were supplied by the following three manufacturers: Nicolon/Mirafi, Polyfelt Americas Inc., and Synthetic Industries. Nicolon/Mirafi provided 6-ounce (oz), 10-oz, and 16-oz geotextile, Polyfelt Americas Inc. provided 6-oz and 16-oz geotextile and Synthetic Industries provided 16-oz geotextile. All fabrics are permeable, non-woven, needle-punched monofilament and allow percolation. The geotextile was used in the cover to primarily separate the contaminated soil from the clean cover soil (Golder, 1989). The geotextile also precludes upward migration of contaminated material by frost heave effects; provides a drainage capillary break layer at the base of the cover on slopes to prevent sloughing during thaws; and provides further means of reducing the chance of incidental contact through land use.

6.2.1.2 Quality Control Testing

The manufacturers of the geotextile material provided Quality Control certificates for the installed 6-, 10-, and 16-oz materials. Copies of the Quality Control Certificates are presented in **Appendix H.1.2**. As material was delivered to the Site, Golder reviewed the Quality Control Certificates for conformance with the 100% Design through the submittal process.

6.2.1.3 Quality Assurance Testing

Rolls of 6-, 10-, and 16-oz geotextile were tested for conformance to the 100% Design Report specifications. Conformance testing was performed by Golder Construction Service's Geosynthetic Laboratory (Golder Construction's Geosynthetic Laboratory) located in Atlanta,

Georgia. Test results are provided in **Appendix H.1.3**. Before individual rolls of geotextile were deployed on-Site, Golder reviewed the test results for conformance with the project specifications.

6.2.2 Geomembrane [Not Applicable To This Property]

6.2.3 Geocomposite

6.2.3.1 Material

Rolls of TN3002CN geocomposite, geonet with a factory bonded geotextile on both sides, were supplied by Fluid Systems and delivered to the Site. The geocomposite was used for supplementary drainage in the permeable cover on the South Hide Pile where slopes were 25 percent or steeper.

6.2.3.2 Quality Control Testing

The manufacturer of the geocomposite material provided Quality Control Certificates. Golder initially reviewed the Quality Control Certificates for conformance with the 100% Design Report specifications and determined the material did not meet the project specifications. Consequently, the Contractor provided a letter of evaluation which concluded that the geocomposite was capable of providing drainage per the design. This letter is provided in **Appendix H.3.2**. Golder also evaluated the drainage capability of the material and confirmed the geocomposite would provide the drainage capacity of the design storm. The material was accepted for use.

6.2.3.3 Quality Assurance Testing

Rolls of geocomposite were sampled and tested for conformance with the project specifications; conformance samples were tested by Golder Construction's Geosynthetic Laboratory. Transmissivity tests were performed by TRI/Environmental Inc., Austin, Texas. Test results are provided in **Appendix H.3.3**.

6.2.4 Geogrid

6.2.4.1 Material

Rolls of UX1400 uniaxial geogrid were supplied by Tensor Inc. and delivered to the Site for placement on the South Hide Pile slopes. These geogrid materials were used to reinforce the cover layer only where the slope of the cover was steeper than 33 percent.

6.2.4.2 Quality Control Testing

The manufacturer of the geogrid materials provided Quality Control Certificates. Through submittals, Golder reviewed the Quality Control Certificates for conformance with the 100% Design Report specifications. Copies of the Quality Control Certificates are presented in **Appendix H.4.2**. Based on the Quality Control Certificates, the geogrid used was in conformance with the 100% Design Report specifications.

6.2.4.3 Quality Assurance Testing

Rolls of geogrid were sampled and tested for conformance with the 100% Design Report specifications. All the conformance tests of the geogrid met the minimum 100% Design Report specification requirements and were tested by Golder Construction's Geosynthetic Laboratory. Test results are provided in **Appendix H.4.3**.

6.2.5 Interface Friction

A key design concern for the cover is its internal stability on slopes. The 100% Design Report required testing of the interface friction between the cover soil and the geotextile. Representative tests of cover soil with geotextile or geocomposite materials were required to verify the design friction angle of 26 degrees. The Contractor presented a testing program and provided initial source test results of the interface friction. Through submittals, Golder reviewed the source test results and determined that, based on the Contractor's certification of source representative testing, the cover soil with geotextile or geocomposite met the 100% Design Report specification requirements. Additional testing was performed by Golder on representative samples of cover soil and geotextile or geocomposite materials for interface friction from the South Hide Pile. Conformance testing of interface friction was performed on a 12-inch by 12-inch direct shear apparatus in the Golder testing laboratory in Calgary, Canada. All conformance test results showed the cover soil with geotextile or geocomposite met the 100% Design Report specifications. Test results are provided in **Appendix H.6**.

6.3 Bituminous Materials [Not Applicable To This Property]

7.0 REMEDY CONSTRUCTION

7.1 Construction Sequence

7.1.1 Decommissioning

7.1.1.1 Decommissioning Wells

Various existing wells and piezometers were identified in the 100% Design Report requiring decommissioning or abandonment prior to construction of the cover on the Site. The 100% Design Report identified wells and piezometers to be decommissioned. The Contractor with a subcontractor (Maher) proposed and submitted for review decommissioning methods for each well in accordance with the 100% Design Report specifications. Maher used several drilling rigs during the decommissioning work, including all-terrain vehicles for remote locations, and a Barber dual rotary drill for over drilling wells. A Smeal pump hoist was used to perforate Poly-vinyl chloride (PVC) pipe left in place. All cuttings were retained in water tight roll-offs and later deposited on the west side of the East Central Hide Pile. PVC pipe removed during decommissioning was disposed of off-Site after decontamination. From December 1992 until April 1993, the majority of the wells were decommissioned or abandoned in accordance with the 100% Design Report specifications. The two wells (OW-13 and OW-41) located on the Pacer Property (Tax Map 10-1-2) were decommissioned or abandoned in accordance with the 100% Design Report.

After reviewing the contractor's well decommissioning reports, Roux Associates confirmed that well decommissioning on the Site was substantially compliant with the 100% Design Report and the procedures outlined in Section 4.6 of the January 2001 *Standard Reference for Monitoring Wells* set forth by MassDEP. Wells were over drilled, pulled, or grouted in place with a grouting mixture of 95% cement and 5% bentonite. Wells were grouted to appropriate depths and plugged with concrete after the time requirement set forth by the standard. Copies of the driller's decommissioning logs are provided in **Appendix E**.

7.1.1.2 Decommissioning Utilities and Structures

The 100% Design Report identified features that required decommissioning or abandonment prior to construction of the cover for the RA. Other abandoned below grade features that were

discovered during construction of the cover were either removed to a depth 2 feet below the placement of the permeable cover or cleaned and backfilled with clean concrete. These features were left in place without any demolition or decommissioning if they did not otherwise impair the long-term effectiveness of the remedy. The general majority of the structure decommissioning occurred during construction of the RTC. A more detailed illustration of this decommissioning can be found in the “Final Report on RTC Cover Certification” dated April 1998 and prepared by Golder.

7.1.2 Soil Remedy

7.1.2.1 Subgrade and Drainage

Existing vegetation was cleared and root matter grubbed to a minimum depth of one foot prior to placement of the permeable cover in areas other than the South Hide Pile. No herbicides were employed to control re-establishment of vegetative growth. Tree roots were grubbed to a depth of two feet. In areas of the hide piles, all existing vegetation was cleared by means of back blading with a dozer, and brush or tree roots were cut to ground surface in order to minimize cutting into the hide pile. Woody material from above ground, roots, and other vegetation were chipped and stockpiled for later placement as fill under the permeable cover. Rocks and concrete debris grubbed from the surface were crushed on-Site in order to comply with the fill material specifications. Reinforcing steel was removed from the concrete during the crushing operations and stockpiled for off-Site disposal.

The cover area in the vicinity of bedrock outcrops or exposed concrete structures was grubbed of vegetation and cleaned in accordance with recommendations of the Site Health and Safety Officer and documented by the Contractor. The surrounding soil cover was extended up to the outcrop or structure.

Material excavated on-Site was the primary source of fill to regrade the slopes of the hide pile or regrade flat areas to provide positive drainage. A granular material has less than 12% by weight passing the #200 sieve. Materials placed to flatten the South Hide Pile were from on-Site sources but were not granular. On-Site soils not meeting the granular criteria were placed as fill in permeable cover areas of the Site flatter than 8H:1V.

Existing subgrade soils were proof rolled prior to placing the cover and fill materials were compacted and tested. The final prepared grade was rolled with a 10-ton smooth wheel compactor or in small areas compacted with a hand operated plate vibratory compactor. Where positive drainage was called for in the 100% Design Report plans, such drainage was achieved in the finish grade of the cover. Throughout construction, erosion and sedimentation measures were generally utilized and maintained in accordance with the 100% Design Report specifications to control soil loss. Any deficiencies in the erosion and sedimentation measures were corrected in accordance with EPA, after consultation with MassDEP, guidelines.

7.1.2.2 Geosynthetics

After proof rolling, the prepared subgrade was inspected and any protruding debris or roots greater than ½-inch in diameter were manually removed prior to placing geosynthetics. After geosynthetics were placed, filling was performed to reach final elevations.

A 16-oz per square yard non-woven geotextile was used in the South Hide Pile permeable cover where slopes were less than 25 percent. The TX3002CN geocomposite was used in the South Hide Pile permeable cover where slopes were steeper than 25 percent. The geocomposite drain material extended to an elevation approximately 10 feet above the toe of the hide pile slopes to intercept any seepage from potential groundwater mounding within the hide pile.

The geotextile materials were sewn together using white nylon thread for dark fabric and black thread for white fabric. Geocomposite was joined at the net with nylon cable ties and then sewn or thermal bonded with another piece of geotextile to minimize cover soil infiltration into the net.

The geotextile seam was initially placed with a minimum slack along the seam to protect it and allow for movement in the geotextile during placement of cover soil. This procedure was primarily practiced in the developed areas of the Site with little topographic relief. Subsequent reviews of the procedure and the 100% Design Report concluded the extra slack was unnecessary and the procedure was discontinued for the remainder of the RA.

7.1.2.3 Cover Soil

Cover soils placed over the geotextile on slopes greater than 8H:1V were granular materials from off-Site sources that had an inherently low potential to clog the geotextile. For slopes flatter than 8H:1V, the cover soil from off-Site sources could contain more than 12 percent by weight passing the #200 sieve. In all areas where the remediated slope was steeper than 33 percent, a geogrid reinforcement layer was included at the base of the cover soil immediately above the geosynthetic layer. The cover soil was placed in a manner that minimized imposed stresses on the underlying geosynthetics by using low ground pressure earth moving equipment and maintaining a minimum thickness of 12 inches of soil between the rubber tire equipment and the geosynthetic. Cover soil placed in unpaved areas with permeable cover was nominally compacted by the action of the placing equipment only.

Each modified section of cover is designed to be a minimum of 16 inches in accordance with the specifications of the 100% Design Report. The types and locations of these modified sections are included in the record drawing documentation, **Attachment 1**.

Minimum thicknesses of cover soil are detailed in Section 02242 of the 100% Design Report. Generally, the permeable cover consists of 12 inches of select soil fill and 4 inches of topsoil. The tolerance, in thickness is -0.0 feet and +0.3 feet. Based upon survey data collected both at the time of construction, as well as post construction data collected, the vast majority of the Site met the design thickness within the tolerances.

Any isolated areas identified by multiple post construction survey data points to be below the acceptable tolerances, were corrected by the placement of additional cover fill to meet the required thickness. This repair of cover fill was performed during the summer of 1999 by Maverick.

Based on analysis of the of the relevant survey data points on the Pacer Property (Tax Map 10-1-2), the minimum thickness of cover soil specified in Section 02242 of the 100% Design Report was met at all locations surveyed throughout the subject property.

7.1.2.4 Topsoil and Vegetation

Topsoil was placed over the cover soil in 4-, 6-, or 8-inch thicknesses as specified by the 100% Design Report. After placing the top soil, lime and fertilizer were applied to the topsoil by a York rake in larger areas and by a walk-behind drop-spreader for small areas. Seed was broadcast by the hydroseed method in all other areas using fertilizer mulch and seed according to the 100% Design Report, or approved variances.

7.1.2.5 Revegetation

The vegetation on the upland soil covers of the Site has been restored to an herbaceous meadow to protect the underlying geotextile from penetration of large, woody roots of trees and shrubs. Drainways adjacent to upland covers have been revegetated with shallow-rooted overhanging vegetation which will eventually provide cooling shade and organic input in the form of leaves.

Criteria for selecting the revegetation plants and seeds in the 100% Design Report included:

- Endemic to Central Massachusetts;
- Tolerant of full sun and water levels;
- Easily established, with fibrous root systems rather than tap roots; and,
- Perennials, or prolific annuals.

7.1.3 Sediment Remedy [Not Applicable To This Property]

7.1.4 Air Remedy [Not Applicable To This Property]

8.0 DESIGN CHANGES

Section 8.0 describes design changes associated with the Alternative Cover Design Report (Golder, 1989), approved by EPA on September 11, 1989, and the RTC Cover Certification Report (VHB/Golder, 1996), approved by EPA on October 1, 1996.

8.1 Change Management

During the RA from 1992 to 1994 for the Site, changes were managed through the Remedial Trust. At the start of 1995, the Remedial Trust and Contractor agreed to a new scope and cost contract for the remaining remedial work. The Construction Management contractor, Golder Construction, performed change management during 1995 as an agent for the Remedial Trust.

Managing changes for the RA primarily included changing the agreed upon scope of work or technical details of the 100% Design Report. Requirements identified in the Consent Decree were not changed unless approved by EPA, after consultation with MassDEP. Changes could be initiated from any of the following: EPA or MassDEP, the Contractor, the Remedial Trust, or Golder as the designer, and later, Golder Construction in the role of Construction Managers.

Changes were divided into two categories, design specification changes and administrative, cost, and schedule changes. Design specification changes were usually technical in nature and involved specific changes to the details of the specifications and plans presented in the 100% Design Report. Generally these changes were minor and EPA, after consultation with MassDEP, initially wanted only to review significant changes. Design changes were originally documented as design/specification change requests (“DSCR”). Impacts to cost and schedule were handled by another system administered by the Remedial Trust.

Early 1994, the Contractor made several management revisions including a new method for managing changes. The Contractor introduced a change management system that included Variance Requests (“VRs”), Change Request Authorizations (“CRAs”), Corrective Action Requests (“CARs”), and Requests for Information (“RFIs”), procedures that subsequently were accepted by the Remedial Trust. The DSCR system was phased out by mid 1994 with the introduction of this change management system. Copies of all the associated forms pertaining to this Cover Certification Report are included in **Appendix C**.

8.2 Site Wide Design Changes

A series of DSCRs and CARs were adopted for Site wide application.

The Site wide design changes listed below were approved by the resident design engineer, project manager, EPA and/or MassDEP. The design changes generally related to grubbing, geotextile selection, geotextile installation, fill materials selection, and fill materials sampling. Several design changes applied to design details that required revision to match the 100% Design Report. The approved design changes included:

- DSCR-001
- DSCR-002
- DSCR-003
- DSCR-023
- DSCR-027
- DSCR-030
- DSCR-056
- DSCR-069

Additional Site wide design changes were identified as requiring further review in order to verify compliance with the 100% Design Specifications. These design changes included:

- CAR-053 involved a request for resampling of Deer Island Stockpile materials due to incorrect initial sampling procedures. The stockpile was resampled on March 30, 1994 and approved by the Agencies on April 28, 1994. The CAR was not signed completely by the design engineer, which appears to be an administrative discrepancy that does not affect the integrity of the cover.
- CAR-071 involved a request for resampling of soil Stockpiles 5 and 6. Hold times for volatiles in the soils were exceeded. The Remedial Trust decided to accept data for Stockpile 5, but requested Stockpile 6 be resampled. Stockpile 6 was resampled on March 30, 1994, and test results were approved by the Agencies on April 28, 1994. The CAR was not signed completely by the design engineer, which appears to be an administrative discrepancy that does not affect the integrity of the cover.

8.3 Property-Specific Design Changes

A series of DSCRs, CARs, VRs, and CRAs were adopted for application on the subject property.

The property-specific design changes listed below were approved by the resident design engineer, project manager, EPA and/or MassDEP. The design changes generally related to materials, materials testing, materials placement, and drainage design. The approved design changes included:

- DSCR-011
- DSCR-012
- DSCR-024
- DSCR-032
- DSCR-034
- DSCR-050
- CAR-001
- VR-008
- VR-009
- VR-034
- VR-056
- VR-064
- VR-067
- VR-076
- VR-077
- VR-079
- VR-086
- VR-089
- VR-090
- CRA-016

Additional property-specific design changes were identified as requiring further review in order to verify compliance with the 100% Design Specifications. These design changes included:

- VR-031 indicates that RUST Remedial Services Inc. requested a variation of DSCR-030-R1 to change the method of placement of riprap over 16-ounce geotextile. The riprap placement was to be performed in accordance with Section 02271-3.01(b) of the 100% Design Report specifications. The Remedial Trust and Design Engineers reviewed this variance request and modified the request, but did not approve it. Their modification required testing of the procedures to be conducted prior to approval of the variance request. Based on Roux Associates' research of available records, including Design Engineer Field Books and Quality Assurance Documents, no evidence was identified that the required testing was conducted or that this design modification was implemented on the Site. Therefore, the tasks discussed in this variance request do not affect the integrity of the cover.

Additional details and documentation of property-specific design changes are located in **Appendix C**.

9.0 QUALITY ASSURANCE OBSERVATION AND TESTING

Construction documentation includes daily field reports and weekly reports to the Remedial Trust. Inspection field diaries were also prepared, and photographs were taken on a regular basis throughout construction. The Golder reports and diaries are not included in this document, but are available for review at Golder's Manchester, New Hampshire office.

9.1 Decommissioning

Wells and piezometer abandonment operations were conducted under intermittent field observation by Golder as a representative of the Remedial Trust. The well decommissioning observations included:

- Verifying the submitted method and equipment to seal the well;
- Verifying the well depth and depth drilled;
- Verifying the diameter of overdrill;
- Verifying the grout mix and volume used; and,
- Verifying the final concrete cap.

A report of well decommissioning for each well on the property (OW-13 and OW-41) was prepared by Maher. The individual decommission logs are presented in **Appendix E**. Roux Associates reviewed the reports for conformance with the decommissioning procedures. Based on the well decommissioning records prepared by Maher, the wells were decommissioned in conformance with the 100% Design Report specifications.

9.2 Compacted Fill

Field moisture-density tests were generally performed at least once per 5,000 square feet per lift using a Troxler Model 3440 Nuclear Density gauge. Golder periodically monitored the soil testing operations performed by PSI. Failing tests were retested. During 1993 to 1994 the Contractor performed soil moisture density tests as quality control testing. The QC testing was performed by Express Geotesting, Concord, Massachusetts.

9.3 Subgrade Preparation

Subgrade preparation was inspected by Golder or PSI and the Contractor prior to geotextile deployment. A subgrade inspection form was prepared by Golder, PSI, or the Contractor for areas in which deployment would take place. Subgrade inspection forms are provided in **Appendix I.1**.

9.4 Permeable Cover

Geotextile was deployed over the prepared subgrade and seamed. The seams were inspected by Golder or PSI and the Contractor to verify the connection. A geotextile seam inspection form was prepared by Golder, PSI, or the Contractor. Geotextile seam inspection forms are provided in **Appendix I.2**.

Cover soil was placed as permeable cover over the geotextile in accordance with the 100% Design Report, and was nominally compacted by the placing equipment. No inspection or testing was required according to the 100% Design Report. Surveyors verified the cover thickness prior to placing topsoil or gravel. Topsoil, soil amendments, and seeds were then added, and the seed germinated with rainfall or water applied from water trucks. The quality of vegetative cover was evaluated. Erosion control matting was utilized in areas where seed did not germinate well.

9.5 Impermeable Liner Installation [Not Applicable To This Property]

9.6 Geocomposite Drainage

Geocomposite provided additional drainage capacity in the permeable cover on the South Hide Pile where slopes were steeper than 25 percent. A geocomposite seam inspection form was prepared by Golder, PSI, or the Contractor for geocomposite seams. Geocomposite forms are provided in **Appendix I.3**.

9.7 Geogrid Reinforcing

Geogrid was deployed for use in the permeable cover for securing the cover soil veneer on the South Hide Pile where slopes were steeper than 33 percent. A geogrid inspection form was prepared by Golder, PSI or the Contractor for seaming the geogrid together. Geogrid inspection forms are provided in **Appendix I.4**.

9.8 Manholes and Culverts [Not Applicable To This Property]

9.9 Seeding and Wetland Vegetation

Calculations for soil loss, based on the United States Department of Agriculture (USDA) Soil Loss Equation, verify assumptions of the topsoil type, anticipated rainfall, vegetative cover type, and slope steepness are still valid with a calculated loss of less than 2 tons per acre per year. Erosion control matting was installed as a temporary measure to supplement the vegetated cover when the remaining growing season was too short to establish protective vegetative growth.

10.0 RECORD DRAWINGS

Based upon the Survey Control (Section 5.1) established for the Industri-Plex Site, Record Drawings of the as-built conditions were established for the soil, sediment and air remedies constructed at the Site, and certified by a Massachusetts Land Surveyor (Meridian Land Services, Inc.). The Record Drawings for this property at the Site are included in **Attachment 1**.

The Record Drawings include an elaborate survey network and extensive details on the horizontal and vertical locations of the various protective covers installed for the soil, sediment and air remedies. These details may aid in the future monitoring and management of the remedy, and Institutional Controls/Grant of Environmental Restrictions boundaries denoted as Class A, B, C, and D Lands.

Where located in Class C lands, existing concrete structures such as concrete pads, stairways, ramps, and loading docks remained in-place as an equivalent cover. These structures are similar to cover types 4, paved equivalent cover, and 5, building equivalent cover. However, because they were not specifically identified in the 100% Design Report, they have not been identified as a specific equivalent cover type herein.

The Record Drawings have plan views and points charts. The plan view shows grid points and intermediate point locations. The points chart shows elevation data collected at each point shown on the plan view. The plan views include contour lines for subgrade and finish grade. A summary of the separate sections of the Record Drawings is as follows:

- Sheet B-36: Specific Property Location;
- Sheet B-37: Boundary Lines, Land Classifications, Easements and As-built Drainage;
- Sheet B-38: Record Points, Topography, & Limits of Engineered Cover;
- Sheet B-39: Cover Types and Transitions; and,
- Sheet B-40: Details and Transitions.

11.0 CERTIFICATION

On behalf of the Remedial Trust, Roux Associates certifies that the Pacer Headquarters, Inc. Property (Tax Map 10-1-2) remedial action was completed in compliance with the approved remedial design and work plans, approved design variances, and the Consent Decree. Any exceptions to the design are noted within this Cover Certification Report. Changes to the cover made following construction completion on June 28, 1996 are not addressed in this report. Approved changes to the cover made since that date are documented in the Administrative Record. The Professional Engineer's certification (below) comprises a declaration of his professional judgment. It does not constitute a warranty or guarantee, expressed or implied, nor does it release any other party of their responsibility to abide by contract documents or applicable codes, standards, regulations, and ordinances.

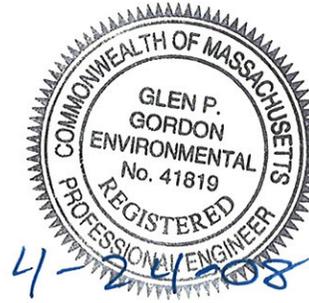
The Professional Engineer's certification is based upon a review of the remedial action documentation. Roux Associates' certification relies upon the accuracy of the as-built survey and record drawings prepared by Meridian and upon the representations made and information provided by the Remedial Trust and its representatives, contractors and consultants involved with the remedial action effort. These contractors and consultants include CWM, Golder, PSI and Maverick.

Respectfully Submitted,

ROUX ASSOCIATES, INC.



Glen Gordon, P.E.
Certifying Engineer for Roux Associates, Inc.
MA License No. 41819



Lawrence McTiernan
Project Principal

Table 1
ISRT Clean Soil Thresholds
in milligrams per kilogram (mg/kg)

Adapted from Table 02223-1

The following table is presented as the clean soil guideline for the Industri-Plex (I-Plex) Site. Metals which are naturally rock-forming compounds may vary from the guideline values on a case by case basis.

Tests	Proposed Threshold Levels for Clean Soil Used at I-Plex		
<i>Volatile Organic (TCL)</i>	Non-detectable (3)	EPA Method	8240
<i>Acid/Base Neutrals (TCL)</i>	Non-detectable (3)	EPA Method	3550/8270/8270
<i>Pesticides/PCBs (TCL)</i>	Non-detectable	EPA Method	3550/8080
<i>Metals - Target Analyte List (TAL) (4)</i>			
Aluminum	< 100,000 mg/kg	EPA Method	3050/6010
Antimony	< 10 mg/kg	EPA Method	3050/6010
Arsenic	< 25 mg/kg	EPA Method	3050/7060
Barium	< 500 mg/kg	EPA Method	3050/6010
Beryllium	< 1 mg/kg	EPA Method	3050/6010
Cadmium	< 10 mg/kg	EPA Method	3050/6010
Calcium	< 50,000 mg/kg	EPA Method	3050/6010
Chromium	< 23 mg/kg	EPA Method	3050/6010
Cobalt	< 20 mg/kg	EPA Method	3050/6010
Copper	< 50 mg/kg	EPA Method	3050/6010
Iron	< 70,000 mg/kg	EPA Method	3050/7420
Lead	< 87 mg/kg	EPA Method	3050/6010
Magnesium	< 10,000 mg/kg	EPA Method	3050/6010
Manganese	< 1,000 mg/kg	EPA Method	3050/6010
Mercury	< 1 mg/kg	EPA Method	3050/7470
Nickel	< 100 mg/kg	EPA Method	3050/6010
Potassium	< 10,000 mg/kg	EPA Method	3050/6010
Selenium	< 20 mg/kg	EPA Method	3050/7740
Silver	< 20 mg/kg	EPA Method	3050/6010
Sodium	< 4,000 mg/kg	EPA Method	3050/6010
Thallium	< 5 mg/kg	EPA Method	3050/7840
Vanadium	< 150 mg/kg	EPA Method	3050/6010
Zinc	< 200 mg/kg	EPA Method	3050/6010
Cyanide	< 10 mg/kg	EPA Method	9010
TPH (Total Petroleum Hydrocarbon)	< 200 mg/kg	EPA Method	418.1

Notes:

- 1) At any time the Trust may revise this list to include testing for additional constituents which may pose a health threat.
- 2) TCL = Target Compound List
- 3) Excludes common laboratory contaminants given in the EPA Region 1 Contract Laboratory Program Data Validation Functional Guidelines.
- 4) TAL Metals by Inductively Coupled Plasma (ICP) and Atomic Absorption (AA) Methods, Test 6010, except run the following constituents by the following methods: (As) 7060, (Pb) 7420, (Se) 7740, (Th) 7840, (Hg) 7470. The 7000's are "furnace and cold vapor AA" methods.

Table 2
Testing Methods for Soil and Geosynthetics
 adapted from Golder's QAPP Table 1-1

7.2 TESTING METHODS	STANDARD	PRECONSTRUCTION FREQUENCY	CONSTRUCTION FREQUENCY
BACKFILL & FILL (Specification Section 02223)			
Backfill and fill tests will be performed by Professional Service Industries, Inc.			
Compacted Fill			
Gradation Test	ASTM D422	1/Source	1/5,000 CY
Plasticity Index	ASTM D4318	1/Source	1/5,000 CY
Standard Compaction	ASTM D698	1/Source	1/5,000 CY
Modified Compaction	ASTM D1557	1/Source	1/5,000 CY
Field Moisture/Density	ASTM D2922	Not Required	9/Lift or 1/100 LF
In-Place Methods	ASTM D1556 or D2167	Not Required	1/Day
Sand Bedding			
Gradation Test	ASTM D422	1/Source	1/5,000 CY
Carbonate Content	ASTM D3042	1/Source	Not Required
SUBANGULAR STONE (Specification Section 02233)			
Subangular stone tests will be performed by Professional Service Industries, Inc.			
AASHTO No. 2, 57, 67			
Gradation Test	ASTM D422	1/Source	1/1,000 CY
Carbonate Content	ASTM D3042	1/Source	Not Required
AASHTO No. 8			
Gradation Test	ASTM D422	1/Source	1/1,000 CY
Carbonate Content	ASTM D3042	1/Source	Not Required
Permeability Test	USCO EM1110-2-1906	1/Source	Not Required
IMPERMEABLE & PERMEABLE COVER FILL (Specification Section 02242)			
Impermeable and permeable cover fill test will be performed by Professional Service Industries, Inc. unless designated with **			
Cover Soil (Select Cover Fill)			
Gradation Test	ASTM D422	1/Source	1/2,000 CY
Plasticity Index	ASTM D4318	1/Source	1/5,000 CY
Direct Shear Test**	Section 02242	1/Source	1/2,000 CY
** Test to be performed by Golder Associates Ltd.			
Top Soil			
Gradation Test	ASTM D422	1/Source	1/2,000 CY
pH Test	ASTM D4972	1/Source	Not Required
Baker Soil Fertility Test**	Section 02242	1/Source	1/2,000 CY
** Test to be performed by Land Management Decisions, Inc.			
WETLANDS SEDIMENT REMEDIATION COVER SOILS (Specification Section 02243)			
Wetland sediment cover soil tests will be performed by Professional Service Industries, Inc. unless designated with **			
Wetland Gravel (Road Structural Fill: Section 02223)			
Gradation Test	ASTM D422	1/Source	1/5,000 CY
Wetland Topsoil (Topsoil: Section 02937)			
Gradation Test	ASTM D422	1/Source	1/5,000 CY
pH Test	ASTM D4972	1/Source	1/5,000 CY
Organic Matter Content	Section 02937, Tbl 2	1/Source	1/5,000 CY
Soil Fertility Test**	Section 02937, Tbl 2	1/Source	1/5,000 CY
** Test to be performed by Land Management Decisions, Inc.			
STREAM SEDIMENT REMEDIATION COVER (Specification Section 02244)			
Stream sediment cover tests will be performed by Professional Service Industries, Inc.			
Gravel/Cobble (Section 02271)			
Abrasion Test	ASTM C535	Not Required	Not Required
Freeze Thaw Test	AASHTO T103	Not Required	Not Required
Specific Gravity	ASTM C127	Not Required	Not Required
Gradation Test-Aggregate	ASTM C136	1/Source	Not Required

Table 2
Testing Methods for Soil and Geosynthetics
 adapted from Golder's QAPP Table 1-1

7.2 TESTING METHODS	STANDARD	PRECONSTRUCTION FREQUENCY	CONSTRUCTION FREQUENCY
STONE RIPRAP (Specification Section 02271) Stone riprap tests will be performed by Professional Service Industries, Inc.			
Gravel/Cobble (d_{50} =3 inches) (Section 02271)			
Abrasion Test	ASTM C535	Not Required	Not Required
Freeze Thaw Test	AASHTO T103	Not Required	Not Required
Specific Gravity	ASTM C127	Not Required	Not Required
Gradation Test-Aggregate	ASTM C136	1/Source	Not Required
Streambed Sediment Filter and Gabion Rock (d_{50} =6 inches)			
Abrasion Test	ASTM C535	Not Required	Not Required
Freeze Thaw Test	AASHTO T103	Not Required	Not Required
Specific Gravity	ASTM C127	Not Required	Not Required
Gradation Test-Aggregate	ASTM C136	1/Source	Not Required
SUBBASE AND PAVEMENT (Specification Section 02575) Subbase and Pavement tests will be performed by Professional Service Industries, Inc.			
Graded Aggregate Base Course			
Gradation Test	AASHTO T11 & T27	1/Source	1/5,000 SY or 1 Day
Compacted Density	AASHTO T180 Method D	1/Source	1/5,000 SY or 1 Day
Abrasion Test*	AASHTO T96	1/Source	1/5,000 SY or 1 Day
Freeze Thaw Test*	AASHTO T103	1/Source	1/5,000 SY or 1 Day
(* as required by MDPW specifications)			
Binding and Wearing Asphalt Courses			
Extraction Test (Plant)	AASHTO T168	Not Required	1/500 Tons
Gradation Test (Plant)	AASHTO T11 or T27	Not Required	1/500 Tons
Density/Stability (Plant)	AASHTO T209, T245, T246, T247	Not Required	1/500 Tons
Max. Theoretical Density	ASTM D2041	Not Required	1/500 Tons
Max. Density - Marshall	AASHTO T209 or T245	Not Required	2/500 Tons
In place Density	ASTM D2950	Not Required	1/100 LF
In place Density (Core)	AASHTO T166	Not Required	1 Core/500 SY
In place Thickness (Core)	AASHTO T166	Not Required	1 Core/500 SY
In place Smoothness Test	Section 02575	Not Required	1/100 LF
GEOTEXTILE (Specification Section 02595) Geotextile tests will be performed by Golder Construction Services, Inc.			
Non-woven, 6, 10, and 16 ounces/square yard			
Mass Per Unit Area	ASTM D5261	1/100,000 SF	Not Required
Grab Strength	ASTM D4632	1/100,000 SF	Not Required
Trapezoidal Tear Strength	ASTM D4533	1/100,000 SF	Not Required
Burst Strength	ASTM D3786	1/100,000 SF	Not Required
Puncture Strength	ASTM D4833	1/100,000 SF	Not Required
Thickness	ASTM D5199	1/100,000 SF	Not Required
Apparent Opening Size	ASTM D4751	1/100,000 SF	Not Required
GEOMEMBRANE (Specification Section 02597) Geomembrane tests will be performed by Golder Construction Services, Inc.			
Textured HDPE			
Thickness	ASTM D5199	1/100,000 SF	Not Required
Density	ASTM D1505	1/100,000 SF	Not Required
Minimum Tensile Properties:	ASTM D638	1/100,000 SF	Not Required
Tensile Strength, Yield			
Tensile Strength, Break			
Elongation at Yield			
Elongation at Break			
Tear Resistance	ASTM D1004 Die C	Not Required	Not Required
Low Temperature Brittleness	ASTM D746 Proc. B	Not Required	Not Required
Dimensional Stability	ASTM D1204	1/100,000 SF	Not Required
Environmental Stress Crack	ASTM D1693	Not Required	Not Required
Puncture Resistance	FTMS 101C Method 2065	Not Required	Not Required
Carbon Black Content	ASTM D1603	1/100,000 SF	Not Required
Carbon Black Dispersion	ASTM D3015	1/100,000 SF	Not Required
Shear Test	ASTM D4437 NSF Mod.	Not Required	1/500 LF
Peel Adhesion (Hot Wedge Fusion Weld)	ASTM D4437 NSF Mod.	Not Required	1/500 LF
Peel Adhesion (Fillet Extrusion Weld)	ASTM D4437 NSF Mod.	Not Required	1/500 LF

Table 2
Testing Methods for Soil and Geosynthetics
 adapted from Golder's QAPP Table 1-1

7.2 TESTING METHODS	STANDARD	PRECONSTRUCTION FREQUENCY	CONSTRUCTION FREQUENCY
GEOCOMPOSITE (Specification Section 02598) Geocomposite tests will be performed by Golder Construction Services, Inc.			
Geocomposite (TEX-NET TN3002CN)			
Geocomposite Transmissivity @ 500 psf; Gradient = 1	ASTM D4716	1/100,000 SF	Not Required
Geocomposite Transmissivity @ 20,000 psf; Gradient = 1	ASTM D4716	1/100,000 SF	Not Required
Tensile Strength - Net only (prior to lamination)	ASTM D5035	Not Required	Not Required
Tensile Strength - Geotextile only (prior to lamination)	ASTM D4632	Not Required	Not Required
Geocomposite Peel Strength	ASTM D413	1/100,000 SF	Not Required
Density - Net only (prior to lamination)	ASTM D1505	Not Required	Not Required
Carbon Black Content - Net only (prior to lamination)	ASTM D1603	Not Required	Not Required
Thickness - Net only (prior to lamination)	ASTM D5199	Not Required	Not Required
Thickness - Geotextile only (prior to lamination)	ASTM D5199	Not Required	Not Required
Geotextile Mass/Unit Area	ASTM D5261	1/100,000 SF	Not Required
Apparent Opening Size - Geotextile only (prior to lamination)	ASTM D4751	Not Required	Not Required
GEOGRID (Specification Section 02599) Geocomposite tests will be performed by Golder Construction Services, Inc.			
Geocomposite (TEX-NET TN3002CN)			
Open Area	COE CW 02215-89	1/100,000 SF	Not Required
Thickness:	ASTM D5199	1/100,000 SF	Not Required
Ribs			
Junctions			
Long Term Design Load (MD)	ASTM D5262	Not Required	Not Required
Flexural Rigidity	ASTM D1388	1/100,000 SF	Not Required
Geogrid Rib Tensile Strength	GRI GG1	1/100,000 SF	Not Required
Junction Node Strength	GRI GG2	1/100,000 SF	Not Required
Strength			
Efficiency			
Density	ASTM D1248	1/100,000 SF	Not Required
Carbon Black Content	ASTM D1603	1/100,000 SF	Not Required
WETLAND MITIGATION (Specification Section 02937) Wetland sediment cover soil tests will be performed by Professional Service Industries, Inc. unless designated with **			
Wetland Cover Soil			
Gradation Test	ASTM D422	1/Source	1/Acre/Lift
Plasticity Index	ASTM D4318	1/Source	1/Acre/Lift
Standard Compaction	ASTM D698	1/Source	1/Source
Flexible Wall Perm Test **	ASTM D5084	1/Source	1/Acre/Lift
Field Moisture/Density	ASTM D2922	Not Required	1/10,000 SF
** Test will be performed by Golder Associates, Inc.			
CAST IN PLACE CONCRETE (Specification Section 03300) Cast in place concrete tests will be performed by Professional Service Industries, Inc.			
Compression Test Cylinders	ASTM C39	Not Required	4/Class/100 CY to
Making of Test Cylinders	ASTM C31	Not Required	4/Class/5,000 SF of
Testing of Aggregate	ASTM C33	Not Required	Concrete Place As

Notes:

QAPP = Quality Assurance Project Plan
 ASTM = American Society for Testing and Materials
 CY = cubic yard
 LF = linear feet
 AASHTO = American Association of State Highway and Transportation Officials
 Tbl = Table
 MDPW = Massachusetts Department of Public Works
 SF = square foot
 PSF = pounds per square foot

Table 3
Summary of Abbreviations
Property-Specific Cover Certification Reports
Industri-Plex Site

Mapping Location:

@	=	at
AAD	=	Atlantic Avenue Drainway
AL	=	Above Geotextile
AP	=	Above Pipe
BECO	=	Boston Edison Company right of way
BLDG	=	Building
BRD	=	Bradford
BSG	=	Below Subgrade
BTOB	=	Below Top of berm
CO	=	Company
COMM	=	Commerce (Way Extension)
DET	=	Detention Basin
E	=	East
EEOS	=	East End of Seam
ECHP	=	East Central Hide Pile
EXT	=	Extension
HUB	=	Hubbardston
MID	=	Middle
N	=	North
PLYM	=	Plymouth
PRES	=	Presidential (Way Extension)
REV	=	Revere
S	=	South
SEOS	=	South End of Seam
SG	=	Subgrade
STK	=	Stock (yard)
UGT	=	Under Ground Tank
UTIL	=	Utility
W	=	West
w/	=	with
WEOS	=	West End of Seam
WIL	=	Wilmington
WOB	=	Woburn

Cover Materials:

GB	=	Gravel Borrow (Subbase)
LL	=	Liquid Limit
MOIST	=	Optimum Moisture Content
NP	=	Non-Plastic
PCF	=	Pounds per Cubic Foot
PL	=	Plastic Limit
PSI	=	Pounds per Square Inch
PROC	=	Processed
SCRND	=	Screened
SD	=	Sand
SS	=	Site Soil
TRI	=	(Bardon) Trimount

INDUSTRI-PLEX SITE OU-1 COVER CERTIFICATION REPORT LOCUS OF TAX MAP LOT 10-1-2 (AKA IC-41) N/F PACER HEADQUARTERS, INC. **RECORD DRAWINGS** WOBURN, MASSACHUSETTS AUGUST 8, 2000

- REFERENCE PLANS:**
- "REGIONAL TRANSPORTATION CENTER - WOBURN, MASSACHUSETTS" ALTERNATE COVER DESIGN - ISSUED FOR EPA/DEP APPROVAL DATE ISSUED: MAY 16, 1995 LATEST ISSUE: JULY 26, 1996, BY VANASSE HANGEN BRUSTLIN, INC., WATERTOWN, MA
 - "INDUSTRI-PLEX SITE - WOBURN, MASSACHUSETTS - 100% DESIGN REPORT, PART I - REMEDIAL WORK FOR SOIL, SEDIMENTS AND AIR - VOLUME 7 OF 8" PREPARED BY GOLDBERG ASSOCIATES, MT. LAUREL, N.J., APRIL 25, 1992.
 - "SUBDIVISION PLAN OF LAND IN WOBURN - DANA F. PERKINS AND SONS, INC., SURVEYORS - JULY 6, 1976 - AUGUST 6, 1976", SCALE: 1"=300', CERT. OF TITLE NO. 150320 BOOK 788 PAGE 132, RECORDED AS PLAN NO. 7312K, LOT 34 ON MAY 6, 1977 AT SOUTH REGISTRY DISTRICT OF MIDDLESEX COUNTY.
 - "ALTA/ACSM - LAND TITLE SURVEY - 112 COMMERCE WAY - WOBURN, MA. - PREPARED FOR NATIONAL DEVELOPMENT - 2310 WASHINGTON STREET - NEWTON LOWER FALLS, MA. 02462", SCALE: 1"=40' DATED MAY 1, 2006 BY ALLEN & MAJOR ASSOCIATES, INC.
 - "PLAN OF LAND IN WOBURN, MA.", SCALE: 1"=100', DATED MARCH 2, 1977 BY DANA F. PERKINS & SONS, INC. (RECORDED IN SRDMC AS PLAN NO. 301 OF 1977).
 - "INDEX PLAN OF - LAND COURT SUBDIVISION - IN - WOBURN, MA" PREPARED FOR THE NORTHEAST REGIONAL TRANSPORTATION CENTER BY MASSACHUSETTS PORT AUTHORITY, DATED OCTOBER 21, 1996, SHEETS 1-6, LCC 7312.

NOTES:

- THE OWNER OF RECORD FOR LOT 10-1-2 IS (NOW OR FORMERLY) PACER HEADQUARTERS, INC. - 112 COMMERCE WAY WOBURN, MASSACHUSETTS 01801. DEED REFERENCE TO PARCEL IS TRANSFER CERTIFICATE #189788 BOOK 1079 PAGE 38, DATED MARCH 14, 1991 (REGISTERED LAND) AND BOOK 21049 PAGE 461 DATED MARCH 14, 1991 (RECORDED LAND). FILED IN THE LAND REGISTRATION OFFICE OF THE SOUTH REGISTRY DISTRICT OF MIDDLESEX COUNTY.
- ELEVATION RECORDS TABULATED ON THESE DRAWINGS WERE COMPILED FROM FIELD OBSERVATIONS COLLECTED BY ELECTRONIC TOTAL STATION AND DATA COLLECTION TECHNIQUES. ELEVATIONS ARE SHOWN TO ONE HUNDREDTH OF A FOOT FOR SIMPLICITY OF TABULATION AND TO REDUCE COMPOUNDING ROUNDING ERRORS. IT IS THE INTENTION OF THE SURVEY TO REFLECT ELEVATIONS ONLY TO THE PRECISION REQUIRED BY THE PROJECT SPECIFICATIONS. ADDITIONAL PRECISION IS NOT IMPLIED BY THE TABULATION. COVER DEPTHS ARE GIVEN IN DECIMAL INCHES AND CALCULATED BY MULTIPLYING THE ELEVATION DIFFERENCES GIVEN IN DECIMAL FEET BY 12.
- THE INFORMATION CONTAINED HEREIN IS THE RESULT OF AN ON-SITE FIELD SURVEY PERFORMED BY MERIDIAN LAND SERVICES, INC. DURING THE PERIOD OF SEPTEMBER, 1993 THROUGH JANUARY, 2000.
- IN GENERAL, PLAN GRAPHICS SUCH AS BUILDINGS, WALKWAYS, CONCRETE PADS, EDGES OF PAVEMENT, CURBING, DRAINAGE FEATURES, ETC. WERE LOCATED FROM A FIELD SURVEY BY THIS OFFICE. ADDITIONAL GRAPHIC REPRESENTATIONS, NOT FIELD LOCATED, SUCH AS NON-GERMANE EDGES OF PAVEMENT, FENCE LINES, WATER COURSES AND ABUTTING DETAIL WERE TAKEN FROM REFERENCE PLANS 1, 2 AND 3. THE LATTER MENTIONED DETAIL WILL BE REFERENCED ON THE PLAN WITHIN THE APPROPRIATE AREAS.
- THE CONSTRUCTION SURVEY CONTROL NETWORK USED BY MERIDIAN LAND SERVICES, INC. WAS DERIVED ENTIRELY FROM THE EXISTING SITE CONTROL POINTS PROVIDED BY GOLDBERG ASSOCIATES AND VHB, INC., AS SHOWN ON REFERENCE PLAN 1, SHEET C-2 AND REFERENCE PLAN 2, SHEETS 11-1A THRU 11-1D.
- THE COORDINATES AND ELEVATIONS OF THE EXISTING SITE CONTROL POINTS ARE BASED ON MASSACHUSETTS GRID COORDINATE SYSTEM/NAD-83 (NORTH AMERICAN DATUM OF 1983), AS STATED IN THE REFERENCE PLAN 2 NOTE 3 & SUBSEQUENTLY VERIFIED BY THIS OFFICE VIA GPS (GLOBAL POSITIONING) IN 2001.
- A BOUNDARY "THE IN" SURVEY WAS PERFORMED BY MERIDIAN LAND SERVICES, INC. PROPERTY LINES SHOWN HEREON WERE COMPILED AND MATHEMATICALLY COMPUTED FROM LAND COURT CASE NUMBER 7312. THESE COMPUTED PLANS WERE "BEST FIT" TO THE PROJECT COORDINATE SYSTEM USING NUMEROUS FIELD LOCATED MONUMENTS. SEE REFERENCE PLAN #5 FOR BOUNDARY LINES PERTAINING TO THIS PARCEL.
- LAND CLASSIFICATION LINES SHOWN HEREON WERE TAKEN FROM REFERENCE PLAN 2.
- ADDITIONAL SITE-WIDE INFORMATION CAN BE FOUND IN THE MASTER COVER CERTIFICATION REPORT, INCLUDING, MASTER RECORD DRAWINGS.

SURVEY CONTROL NETWORK POINTS

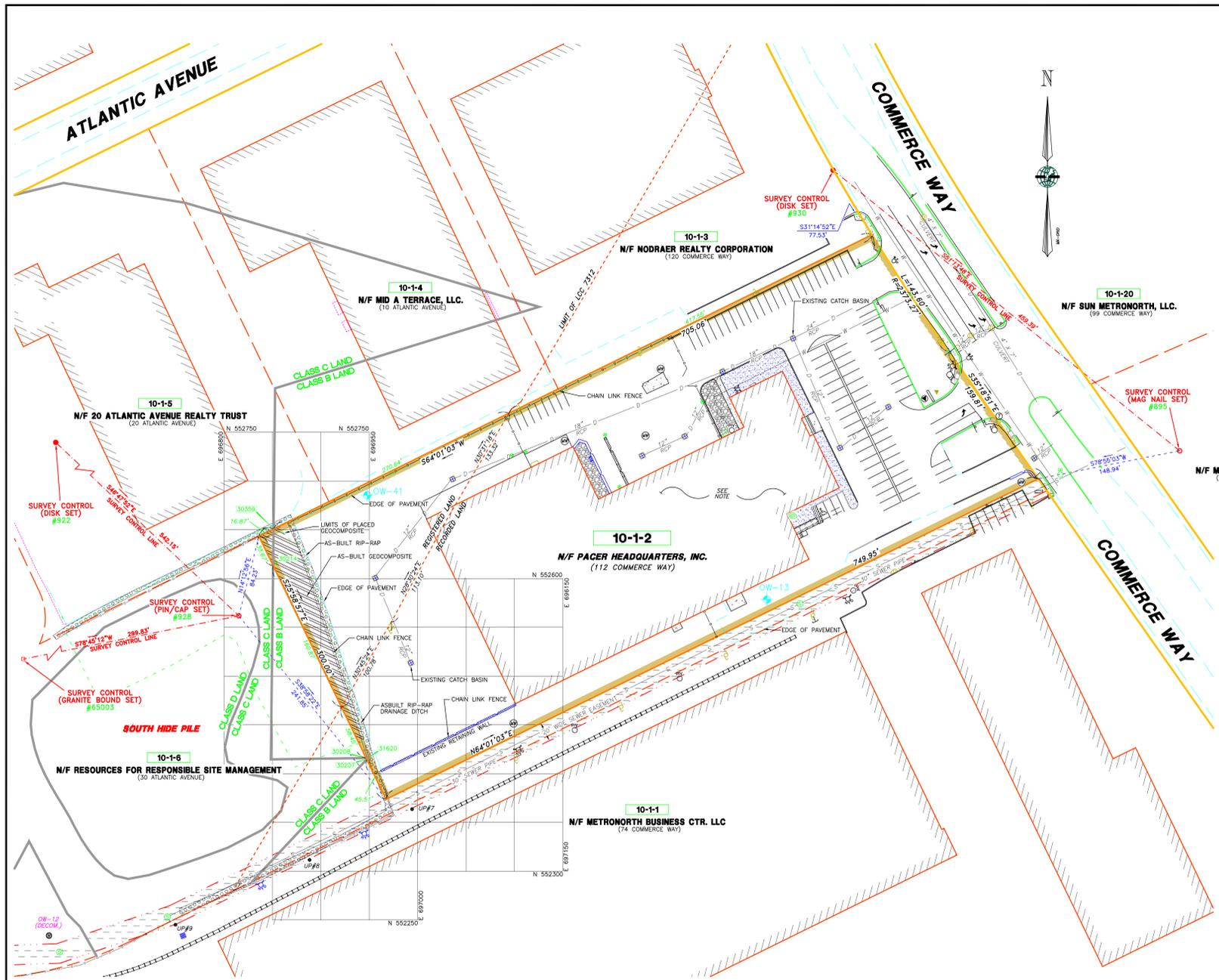
POINT #	NORTHING (FEET)	EASTING (FEET)	ELEVATION (FEET)	DESC.
8	550829.34	698197.41	88.93	PNV(C)
9	549703.83	695347.19	93.29	MAP(C)
117	554935.71	696605.05	119.44	LPN(C)
118	554997.69	696744.31	124.49	LPN(C)
119	554977.42	696743.82	124.49	LPN(C)
120	556005.46	696613.05	95.27	C.B.(I)
128	555127.88	697140.29	115.81	LPN(C)
129	555279.16	696980.59	117.47	LPN(C)
130	556070.20	696889.50	118.61	C.B.(I)
132	554947.71	694165.86	78.43	LPN(C)
133	555008.90	695126.18	96.01	PX.(I)
134	555102.48	695356.34	96.90	LPN(C)
135	555142.01	695223.43	96.28	PX.(I)
157	555902.41	696284.78	96.59	C.B.(I)
216	554833.75	696989.97	115.51	DSK
220	554921.67	695784.06	73.06	D.H.(I)
221	554863.96	695488.38	98.35	PX.(I)
245	553801.79	695102.81	70.74	PNV(C)
301	552991.99	695450.71	67.70	C.B.(I)
302	552983.98	695736.35	68.50	C.B.(I)
303	552824.40	695720.82	66.92	G.B.(I)
751	55014.48	698868.23	58.42	G.B.(I)
752	550353.51	698115.21	57.52	G.B.(I)
754	550089.43	697819.49	53.51	PNV(C)
755	550155.77	697925.27	54.70	C.B.(I)
756	550192.19	698080.56	56.08	PNV(C)
826	552989.66	695204.96	72.68	RRP(C)
831	550171.07	696967.26	92.16	PNV(C)
832	555402.29	695870.66	86.06	PX.(I)
833	558448.48	695550.37	78.24	PNV(C)
834	550080.77	695290.39	98.82	PNV(C)
850	553168.01	695458.74	66.79	PX.(I)
857	554298.42	694140.00	73.19	PNV(C)
858	553407.27	694211.18	73.66	PX.(I)
871	552035.83	694889.59	75.27	PX.(I)
872	553190.49	694871.47	74.38	PX.(I)
873	553293.14	694886.21	73.74	PNV(C)
874	553192.65	695285.83	72.86	PX.(I)
887	553589.05	697762.19	74.87	G.B.(I)
888	553721.99	698088.18	75.46	G.B.(I)
889	553895.08	698391.10	74.41	PNV(C)
890	553542.21	698469.64	72.97	G.B.(I)
891	552979.28	698142.48	68.34	PNV(C)
892	552674.56	698135.57	68.58	G.B.(I)
893	552536.04	698135.57	68.58	G.B.(I)
894	553002.10	698412.19	69.40	MAP(C)
895	552730.89	697787.70	67.50	MAP(C)
910	554448.09	698130.30	106.02	PNV(C)
920	553826.01	698985.76	78.40	PNV(C)
921	553411.21	698356.36	78.84	PNV(C)
922	552932.88	698420.08	71.72	DSK
923	553120.20	698516.46	72.78	DSK
924	553462.01	697531.77	68.39	DSK
925	553842.55	697009.22	94.88	PNV(C)
926	554033.87	697969.28	79.00	DSK
927	553812.75	696737.39	107.69	PNV(C)
928	552561.14	698815.28	86.15	PNV(C)
929	552790.05	697119.09	71.75	PNV(C)
930	553185.65	697429.23	80.02	DSK
931	554521.69	694562.77	87.39	D.H.(I)
932	554421.26	694348.31	101.39	G.B.(I)
933	554231.87	694564.35	90.86	G.B.(I)
934	553498.56	694623.81	69.94	PNV(C)
944	553781.01	694317.86	72.10	PNV(C)
945	553702.01	694300.90	81.03	PNV(C)
937	553144.85	694221.58	87.94	PNV(C)
938	552836.53	694053.72	80.60	PNV(C)
944	550614.66	697437.80	N/A	G.B.(I)
945	554603.77	694263.96	74.68	PX.(I)
947	552992.72	695761.93	65.82	DSK
948	552433.09	695355.77	63.57	G.B.(I)
949	552814.87	695662.32	71.33	G.B.(I)
950	552035.73	696113.53	68.40	G.B.(I)
951	552837.13	696113.53	68.40	G.B.(I)
952	551433.89	697800.32	73.68	DSK
953	551807.91	698466.50	63.84	LPN(C)
954	550919.29	698799.73	60.45	DSK
955	551537.44	698410.23	63.81	DSK
956	551981.51	698306.16	65.32	G.B.(I)
957	552594.26	698003.18	67.73	G.B.(I)
960	554676.37	696577.56	96.32	G.B.(I)
961	554434.15	696071.84	85.91	G.B.(I)
962	553960.20	695295.07	79.36	G.B.(I)
963	553612.09	695462.70	78.81	DSK
964	553810.04	696033.71	79.67	G.B.(I)
965	553424.46	696186.34	79.07	G.B.(I)
966	553373.67	695676.30	77.88	DSK
967	553108.66	695962.24	76.92	DSK
968	552790.10	695786.11	73.69	DSK
971	554876.18	698686.81	126.11	PNV(C)
972	555073.02	698622.69	125.79	PNV(C)
975	555324.88	697186.40	117.15	PNV(C)
974	555329.59	697186.40	117.15	PNV(C)
976	555468.38	697809.50	92.45	DSK
978	555460.49	697867.72	72.39	PNV(C)
977	555411.42	697977.77	85.47	PNV(C)
978	555238.37	697940.64	70.49	G.B.(I)
979	555115.08	698015.18	87.28	PNV(C)
980	554828.03	698008.18	80.83	PNV(C)
981	554830.02	697791.82	87.61	G.B.(I)
982	554608.27	697651.98	76.95	DSK
983	554373.91	697697.91	77.28	MAP(C)
984	554072.15	697338.66	76.58	PNV(C)
985	554090.37	697850.88	75.15	PNV(C)

SURVEY CONTROL NETWORK POINTS

POINT #	NORTHING (FEET)	EASTING (FEET)	ELEVATION (FEET)	DESC.
198	553791.19	697828.87	72.71	G.B.(I)
1141	550481.21	698190.85	83.57	LPN(C)
10874	55318.80	695378.82	69.28	G.B.(I)
10875	553209.96	695361.06	69.88	G.B.(I)
10841	553209.59	695443.81	67.53	G.B.(I)
60300	553394.76	694754.40	69.61	G.B.(I)
60302	552811.04	694811.44	81.43	G.B.(I)
60304	553431.74	694740.48	72.60	G.B.(I)
60305	553431.74	694740.48	72.60	G.B.(I)
60306	552811.04	694811.44	81.43	G.B.(I)
60307	552811.04	694811.44	81.43	G.B.(I)
60308	552811.04	694811.44	81.43	G.B.(I)
60309	552811.04	694811.44	81.43	G.B.(I)
60310	552811.04	694811.44	81.43	G.B.(I)
60311	552811.04	694811.44	81.43	G.B.(I)
60312	552811.04	694811.44	81.43	G.B.(I)
60313	552811.04	694811.44	81.43	G.B.(I)
60314	552811.04	694811.44	81.43	G.B.(I)
60315	552811.04	694811.44	81.43	G.B.(I)
60316	552811.04	694811.44	81.43	G.B.(I)
60317	552811.04	694811.44	81.43	G.B.(I)
60318	552811.04	694811.44	81.43	G.B.(I)
60319	552811.04	694811.44	81.43	G.B.(I)
60320	552811.04	694811.44	81.43	G.B.(I)
60321	552811.04	694811.44	81.43	G.B.(I)
60322	552811.04	694811.44	81.43	G.B.(I)
60323	552811.04	694811.44	81.43	G.B.(I)
60324	552811.04	694811.44	81.43	G.B.(I)
60325	552811.04	694811.44	81.43	G.B.(I)
60326	552811.04	694811.44	81.43	G.B.(I)
60327	552811.04	694811.44	81.43	G.B.(I)
60328	552811.04	694811.44	81.43	G.B.(I)
60329	552811.04	694811.44	81.43	G.B.(I)
60330	552811.04	694811.44	81.43	G.B.(I)
60331	552811.04	694811.44	81.43	G.B.(I)
60332	552811.04	694811.44	81.43	G.B.(I)
60333	552811.04	694811.44	81.43	G.B.(I)
60334	552811.04	694811.44	81.43	G.B.(I)
60335	552811.04	694811.44	81.43	G.B.(I)
60336	552811.04	694811.44	81.43	G.B.(I)
60337	552811.04	694811.44	81.43	G.B.(I)
60338	552811.04	694811.44	81.43	G.B.(I)
60339	552811.04	694811.44	81.43	G.B.(I)
60340	552811.04	694811.44	81.43	G.B.(I)
60341	552811.04	694811.44	81.43	G.B.(I)
60342	552811.04	694811.44	81.43	G.B.(I)
60343	552811.04	694811.44	81.43	G.B.(I)
60344	552811.04	694811.44	81.43	G.B.(I)
60345	552811.04	694811.44	81.43	G.B.(I)
60346	552811.04	694811.44	81.43	G.B.(I)
60347	552811.04	694811.44	81.43	G.B.(I)
60348	552811.04	694811.44	81.43	G.B.(I)
60349	552811.04	694811.44	81.43	G.B.(I)
60350	552811.04	694811.44	81.43	G.B.(I)

LOT # CHART

LOT #	TAX MAP	ADDRESS
LOT 10-1-1	4-7-9	229 NEW BOSTON STREET
LOT 10-1-2	9-2-1	129 NEW BOSTON STREET R
LOT 10-1-3	9-2-2	223 NEW BOSTON STREET
LOT 10-1-4	9-2-3	221 NEW BOSTON STREET
LOT 10-1-5	9-2-4	219 NEW BOSTON STREET
LOT 10-1-6	9-2-5	217 NEW BOSTON STREET
LOT 10-1-7	9-2-6	215 NEW BOSTON STREET
LOT 10-1-8	9-2-7	211 NEW BOSTON STREET
LOT 10-1-9	9-2-8	NEW BOSTON STREET
LOT 10-1-10	9-2-9	MERRIMAC STREET
LOT 10-1-11	9-2-10	MERRIMAC STREET
LOT 10-1-12	9-2-11	209 MERRIMAC STREET
LOT 10-1-13	9-2-12	207 MERRIMAC STREET
LOT 10-1-14	9-2-13	205 MERRIMAC STREET
LOT 10-1-15	9-2-14	201 MERRIMAC STREET
LOT 10-1-16	9-2-15	210 NEW BOSTON STREET
LOT 10-1-17	9-2-16	208 NEW BOSTON STREET
LOT 10-1-18	9-2-17	206 NEW BOSTON STREET
LOT 10-1-19	9-2-18	204 NEW BOSTON STREET
LOT 10-1-20	9-2-19	202 NEW BOSTON STREET



MLB LEGEND

ASBUILT COVER TYPE	BOUNDARY LINE	LIMITS OF EXISTING EASEMENTS
TEST PIT	RIGHT-OF-WAY	EDGE OF EXISTING BUILDINGS
MONITOR WELL	ABUTTING PROPERTY LINES	AREA OF LEDE
BORING LOCATION	ASPHALT, CONCRETE, GRANITE CURB	HIDE FILES BASED ON CONSENT DECREE
MICRO WELL LOCATION	TRANSITION ZONE	LIMITS OF RIPRAP = 6" STONE
PIEDMETER LOCATION	LAND CLASS LINE	AREA OF ENGINEERED COVER
SOIL SAMPLE LOCATION	GRID LINE	(COMPLIES WITH 100% DESIGN PLANS UNLESS OTHERWISE NOTED)
STAFF GAUGE LOCATION	EDGE OF EXISTING PAVEMENT	LIMITS OF GEOTEXTILE
TELEPHONE LOCATION	LIMIT OF GEOTEXTILE	A.T.A.T. FIBER OPTIC CABLE
UID LOCATION	TOE OF SLOPE	TOP OF SLOPE
MONITORING WELL LOCATION	LIMIT CHAIN LINK FENCE	EDGE OF ASBUILT GRAVEL ROAD
HYDRANT	BACK EDGE OF PLANTER	EDGE OF PROPOSED PAVEMENT
GATE VALVE	EDGE OF ASBUILT GRAVEL ROAD	EXISTING EASEMENT
CATCH BASIN (SQUARE)	ASBUILT FINISH GRADE CONTOUR 5' INTERVAL	ASBUILT FINISH GRADE CONTOUR 1' INTERVAL
CATCH BASIN (ROUND)	ASBUILT FINISH GRADE CONTOUR 1' INTERVAL	OVERHEAD WIRES
DRAIN MANHOLE	EXISTING EASEMENT	ASBUILT CULVERT
SEWER MANHOLE	ASBUILT CULVERT	UTILITY POLE
UTILITY POLE	UTILITY POLE	GUY WIRE
GUY WIRE	UTILITY POLE	EXISTING CONCRETE STRUCTURE
ASBUILT POINT NO. & LOCATION	ASBUILT POINT NO. & LOCATION	ASBUILT POINT NO. & LOCATION
GAS METER	GAS METER	GAS SHUT OFF
GAS SHUT OFF	GAS SHUT OFF	WATER SHUT OFF
WATER SHUT OFF	WATER SHUT OFF	WATER CONTROL BOX
WATER CONTROL BOX	WATER CONTROL BOX	SIGN
SIGN	SIGN	BOLLARD
BOLLARD	BOLLARD	TELEPHONE MANHOLE
TELEPHONE MANHOLE	TELEPHONE MANHOLE	SURVEY CONTROL MONUMENT (GRANITE BOUND SET)
SURVEY CONTROL MONUMENT (GRANITE BOUND SET)	SURVEY CONTROL MONUMENT (DISK SET)	SURVEY CONTROL MONUMENT (PIN/CAP SET)
SURVEY CONTROL MONUMENT (DISK SET)	SURVEY CONTROL MONUMENT (PIN/CAP SET)	SURVEY CONTROL MONUMENT (DISK SET)
SURVEY CONTROL MONUMENT (PIN/CAP SET)	SURVEY CONTROL MONUMENT (DISK SET)	SURVEY CONTROL MONUMENT (PIN/CAP SET)

LEGEND PER REFERENCE PLAN 3b

LEGEND

DOWNSPOUT	BOLLARD	POSITION INDICATOR VALVE
SIGN	GAS GATE	HANDICAP RAMP
TRAFFIC MAST	DRAIN MANHOLE	FLAG POLE
WATER GATE	CATCH BASIN	UTILITY POLE W/LIT
FLAG POLE	GUY WIRE	GAS METER
GUY WIRE	ROUND BASIN	MONITOR WELL
MONITOR WELL	FIRE BOX	FIRE HYDRANT
FIRE HYDRANT	RETAINING WALL	CURB BIT
RETAINING WALL	CURB GRANITE	EDGE OF PAVE
CURB BIT	CRUSHED STONE	CONCRETE
CRUSHED STONE	CONCRETE	LANDSCAPED AREA

SURVEY CONTROL NETWORK POINTS

POINT #	NORTHING (FEET)	EASTING (FEET)	ELEVATION (FEET)	DESC.
8	558209.94	698197.41	88.83	PA(C/S)
9	558209.94	698197.41	88.83	PA(C/S)
117	558355.71	698205.05	19.44	IPN(C)
118	558355.71	698205.05	19.44	IPN(C)
119	558355.71	698205.05	19.44	IPN(C)
120	558355.71	698205.05	19.44	IPN(C)
121	558355.71	698205.05	19.44	IPN(C)
122	558355.71	698205.05	19.44	IPN(C)
123	558355.71	698205.05	19.44	IPN(C)
124	558355.71	698205.05	19.44	IPN(C)
125	558355.71	698205.05	19.44	IPN(C)
126	558355.71	698205.05	19.44	IPN(C)
127	558355.71	698205.05	19.44	IPN(C)
128	558355.71	698205.05	19.44	IPN(C)
129	558355.71	698205.05	19.44	IPN(C)
130	558355.71	698205.05	19.44	IPN(C)
131	558355.71	698205.05	19.44	IPN(C)
132	558355.71	698205.05	19.44	IPN(C)
133	558355.71	698205.05	19.44	IPN(C)
134	558355.71	698205.05	19.44	IPN(C)
135	558355.71	698205.05	19.44	IPN(C)
136	558355.71	698205.05	19.44	IPN(C)
137	558355.71	698205.05	19.44	IPN(C)
138	558355.71	698205.05	19.44	IPN(C)
139	558355.71	698205.05	19.44	IPN(C)
140	558355.71	698205.05	19.44	IPN(C)
141	558355.71	698205.05	19.44	IPN(C)
142	558355.71	698205.05	19.44	IPN(C)
143	558355.71	698205.05	19.44	IPN(C)
144	558355.71	698205.05	19.44	IPN(C)
145	558355.71	698205.05	19.44	IPN(C)
146	558355.71	698205.05	19.44	IPN(C)
147	558355.71	698205.05	19.44	IPN(C)
148	558355.71	698205.05	19.44	IPN(C)
149	558355.71	698205.05	19.44	IPN(C)
150	558355.71	698205.05	19.44	IPN(C)
151	558355.71	698205.05	19.44	IPN(C)
152	558355.71	698205.05	19.44	IPN(C)
153	558355.71	698205.05	19.44	IPN(C)
154	558355.71	698205.05	19.44	IPN(C)
155	558355.71	698205.05	19.44	IPN(C)
156	558355.71	698205.05	19.44	IPN(C)
157	558355.71	698205.05	19.44	IPN(C)
158	558355.71	698205.05	19.44	IPN(C)
159	558355.71	698205.05	19.44	IPN(C)
160	558355.71	698205.05	19.44	IPN(C)
161	558355.71	698205.05	19.44	IPN(C)
162	558355.71	698205.05	19.44	IPN(C)
163	558355.71	698205.05	19.44	IPN(C)
164	558355.71	698205.05	19.44	IPN(C)
165	558355.71	698205.05	19.44	IPN(C)
166	558355.71	698205.05	19.44	IPN(C)
167	558355.71	698205.05	19.44	IPN(C)
168	558355.71	698205.05	19.44	IPN(C)
169	558355.71	698205.05	19.44	IPN(C)
170	558355.71	698205.05	19.44	IPN(C)
171	558355.71	698205.05	19.44	IPN(C)
172	558355.71	698205.05	19.44	IPN(C)
173	558355.71	698205.05	19.44	IPN(C)
174	558355.71	698205.05	19.44	IPN(C)
175	558355.71	698205.05	19.44	IPN(C)
176	558355.71	698205.05	19.44	IPN(C)
177	558355.71	698205.05	19.44	IPN(C)
178	558355.71	698205.05	19.44	IPN(C)
179	558355.71	698205.05	19.44	IPN(C)
180	558355.71	698205.05	19.44	IPN(C)
181	558355.71	698205.05	19.44	IPN(C)
182	558355.71	698205.05	19.44	IPN(C)
183	558355.71	698205.05	19.44	IPN(C)
184	558355.71	698205.05	19.44	IPN(C)
185	558355.71	698205.05	19.44	IPN(C)
186	558355.71	698205.05	19.44	IPN(C)
187	558355.71	698205.05	19.44	IPN(C)
188	558355.71	698205.05	19.44	IPN(C)
189	558355.71	698205.05	19.44	IPN(C)
190	558355.71	698205.05	19.44	IPN(C)
191	558355.71	698205.05	19.44	IPN(C)
192	558355.71	698205.05	19.44	IPN(C)
193	558355.71	698205.05	19.44	IPN(C)
194	558355.71	698205.05	19.44	IPN(C)
195	558355.71	698205.05	19.44	IPN(C)
196	558355.71	698205.05	19.44	IPN(C)
197	558355.71	698205.05	19.44	IPN(C)
198	558355.71	698205.05	19.44	IPN(C)
199	558355.71	698205.05	19.44	IPN(C)
200	558355.71	698205.05	19.44	IPN(C)

SURVEY CONTROL NETWORK POINTS

POINT #	NORTHING (FEET)	EASTING (FEET)	ELEVATION (FEET)	DESC.
886	557391.19	697828.87	72.71	G.B.(F)
1141	555438.21	696190.95	83.27	IPN(C)
10874	555119.80	695375.82	89.28	G.B.(C)
10875	555350.95	695361.85	89.88	G.B.(C)
10941	553309.59	694548.81	67.53	G.B.(C)
52003	553504.76	694675.40	69.61	IPN(C)
60500	552811.04	694811.44	81.43	G.B.(F)
60501	552811.04	694811.44	81.43	G.B.(F)
60502	552811.04	694811.44	81.43	G.B.(F)
60503	552811.04	694811.44	81.43	G.B.(F)
60504	552811.04	694811.44	81.43	G.B.(F)
60505	552811.04	694811.44	81.43	G.B.(F)
60506	552811.04	694811.44	81.43	G.B.(F)
60507	552811.04	694811.44	81.43	G.B.(F)
60508	552811.04	694811.44	81.43	G.B.(F)
60509	552811.04	694811.44	81.43	G.B.(F)
60510	552811.04	694811.44	81.43	G.B.(F)
60511	552811.04	694811.44	81.43	G.B.(F)
60512	552811.04	694811.44	81.43	G.B.(F)
60513	552811.04	694811.44	81.43	G.B.(F)
60514	552811.04	694811.44	81.43	G.B.(F)
60515	552811.04	694811.44	81.43	G.B.(F)
60516	552811.04	694811.44	81.43	G.B.(F)
60517	552811.04	694811.44	81.43	G.B.(F)
60518	552811.04	694811.44	81.43	G.B.(F)
60519	552811.04	694811.44	81.43	G.B.(F)

NOTE:
EXISTING IMPROVEMENTS SHOWN (OUTSIDE THE ENGINEERED COVER) FOR LOT 10-1-2 ARE PER REFERENCE PLAN #3b AND ARE NOT THE RESULT OF A FIELD SURVEY BY THIS OFFICE.

LAND CLASS RESTRICTED AREAS POINTS CHART

NUMBER	NORTHING	EASTING	BEARING	LENGTH
10339	552650.4	696831.7	S05°37'59"W	17.66
10340	552650.4	696831.7	S05°37'59"W	17.66
10341	552650.4	696831.7	S05°37'59"W	17.66
10342	552650.4	696831.7	S05°37'59"W	17.66
10343	552650.4	696831.7	S05°37'59"W	17.66
10344	552650.4	696831.7	S05°37'59"W	17.66
10345	552650.4	696831.7	S05°37'59"W	17.66
10346	552650.4	696831.7	S05°37'59"W	17.66
10347	552650.4	696831.7	S05°37'59"W	17.66
10348	552650.4	696831.7	S05°37'59"W	17.66
10349	552650.4	696831.7	S05°37'59"W	17.66
10350	552650.4	696831.7	S05°37'59"W	17.66

RESTRICTED AREAS BY CLASSES OF LAND

CLASS OF LAND	DESCRIPTION
A	MAY CONTAIN CONTAMINATED GROUNDWATER
B	MAY CONTAIN CONTAMINATED GROUNDWATER, AND MAY CONTAIN CONTAMINATED SOILS. NO COVER WAS REQUIRED WITHIN CLASS B.
C	MAY CONTAIN CONTAMINATED GROUNDWATER, AND CONTAINS CONTAMINATED SOIL AND COVER.
D	MAY CONTAIN CONTAMINATED GROUNDWATER, AND CONTAINS CONTAMINATED SOIL AND COVER. CLASS D ALSO CONTAINS FOUR ANIMAL HIDE PILES.

FINAL

PROJECT RECORD (TAX MAP LOT 10-1-2)
BOUNDARY LINES, LAND CLASSIFICATIONS, EASEMENTS AND ASBUILT DRAINAGE
INDUSTRI-PLEX SITE REMEDIAL TRUST
WOBURN, MASSACHUSETTS

DESIGNED BY: MDP
DRAFTED BY: CAC
CHECKED BY: JGK

B-37
SHEET NO.
PROJECT: 29000.00
SHEET 2 OF 5

SCALE: 1" = 40'

GRAPHIC SCALE

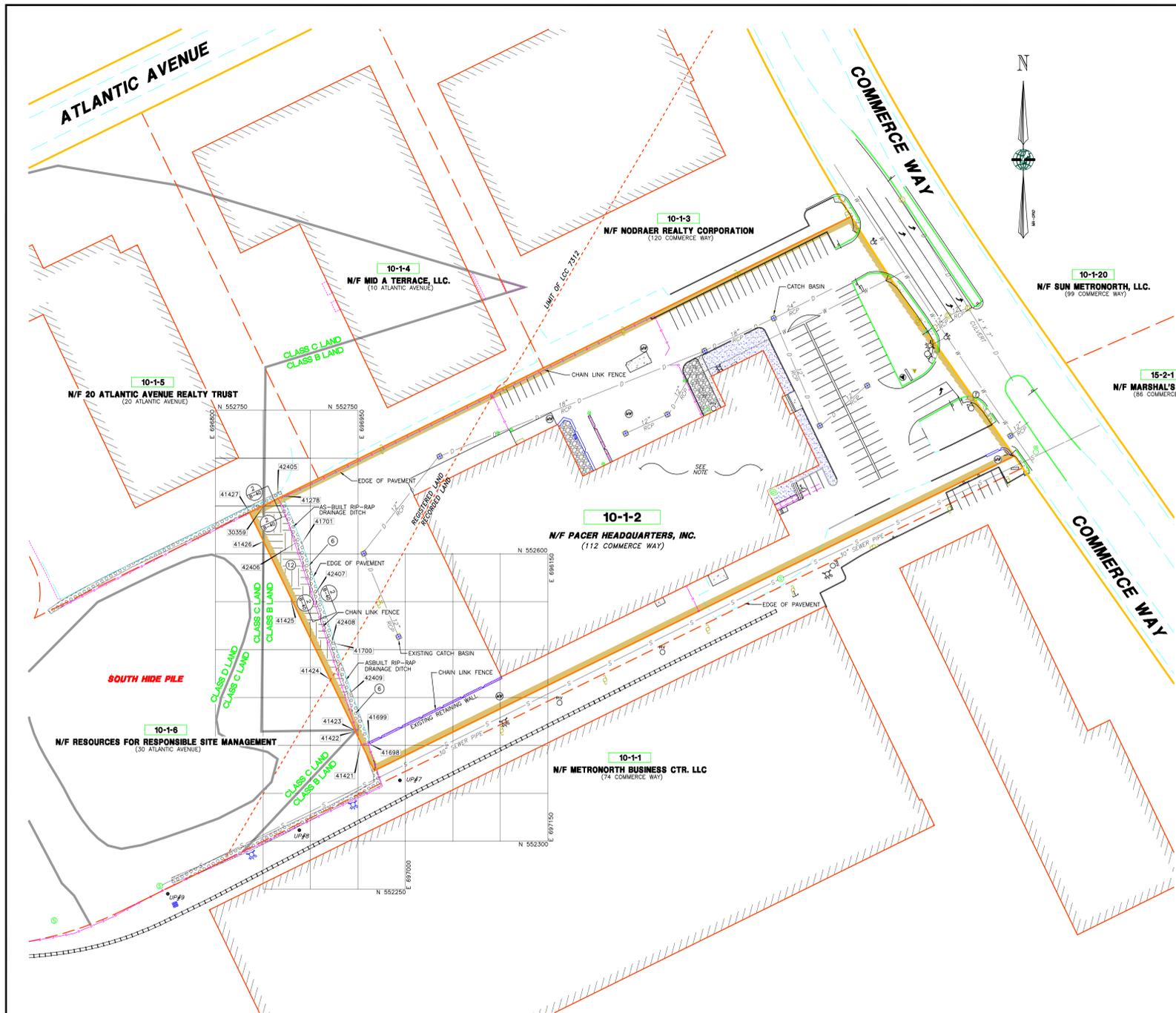
APRIL 8, 2020

PROFESSIONAL ENGINEER
PROFESSIONAL LAND SURVEYOR

ROUX ASSOCIATES, INC.
Environmental Consulting & Management

Meridian Land Services, Inc.
LAND SURVEYING & MAPPING
CONSTRUCTION SURVEYING & MAPPING
UTILITY SURVEYING & MAPPING
AS-BUILT SURVEYING & MAPPING
CONCRETE SURVEYING & MAPPING
LANDSCAPED AREA SURVEYING & MAPPING

Golden Associates
Monroeville, New Hampshire
400 Commercial Street
Monroeville, NH 03858
603-668-1050 • FAX 603-668-1199



MLS LEGEND

—	BOUNDARY LINE	—	ASBUILT COVER TYPE
—	RIGHT-OF-WAY	—	TEST PIT
—	ABUTTING PROPERTY LINES	—	MONITOR WELL
—	ASPHALT, CONCRETE, GRANITE CURB	—	HYDRANT
—	TRANSITION ZONE	—	GATE VALVE
—	LAND CLASS LINE	—	CATCH BASIN (SQUARE)
—	GRID LINE	—	CATCH BASIN (ROUND)
—	EDGE OF EXISTING PAVEMENT	—	DRAIN MANHOLE
—	LIMIT OF GEOTEXTILE	—	SEWER MANHOLE
—	A.T.&T. FIBER OPTIC CABLE	—	UTILITY POLE
—	TOE OF SLOPE	—	GUY WIRE
—	TOP OF SLOPE	—	ASBUILT POINT NO. & LOCATION
—	LIMIT CHAIN LINK FENCE	—	GAS METER
—	EDGE OF ASBUILT GRAVEL ROAD	—	GAS SHUT OFF
—	BACK EDGE OF PLANTER	—	WATER SHUT OFF
—	EDGE OF PROPOSED PAVEMENT	—	WATER CONTROL BOX
—	EXISTING EASEMENT	—	SIGN
—	ASBUILT CULVERT	—	BOLLARD
—	LIMIT OF TREE LINE	—	TELEPHONE MANHOLE
—	EXISTING CONCRETE STRUCTURE	—	POINT MARKER (SEE POINTS CHART)
—	ASBUILT FINISH GRADE CONTOUR 5' INTERVAL	—	
—	ASBUILT FINISH GRADE CONTOUR 1' INTERVAL	—	
—	OVERHEAD WIRES	—	
—	UNDERGROUND GAS LINE	—	
—	LIMITS OF EXISTING EASEMENTS	—	
—	EDGE OF EXISTING BUILDINGS	—	

DETAIL/CROSS SECTION DESIGNATION
SHEET NO. WHERE DETAIL/CROSS SECTION IS PRESENTED

COVER TYPES (EQUIVALENT)

AREA	ORIGINAL CONDITION	EQUIVALENT COVER TYPE
4	PAVED	EQUIVALENT COVER
5	BUILDING	EQUIVALENT COVER
8	BEDROCK DRAINAGE SWALE	BLAST/EXCAVATE CHANNEL EQUIVALENT COVER
21	BEDROCK OUTCROP	GRUB & CLEAN EQUIVALENT COVER
30	STACK	EQUIVALENT COVER

LEGEND PER REFERENCE PLAN 3b

LEGEND

○	DOWNSPOUT
○	BOLLARD
○	POSITION INDICATOR VALVE
○	SIGN
○	GAS GATE
○	HANDICAP RAMP
○	TRAFFIC MAST
○	DRAIN MANHOLE
○	WATER GATE
○	FLAG POLE
○	CATCH BASIN
○	UTILITY POLE W/LOT
○	GUY WIRE
○	GAS METER
○	ROUND BASIN
○	MONITOR WELL
○	FIRE BOX
○	FIRE HYDRANT
○	RETAINING WALL
○	CURB BIT
○	CURB GRANITE
○	EDGE OF PAVE
○	CONCRETE
○	LANDSCAPED AREA

COVER TYPES (ENGINEERED)

AREA	ORIGINAL CONDITION	COVER TYPE
1	VARIES	ABOVE GRADE PERMEABLE COVER
2	VARIES	AT GRADE PERMEABLE COVER
3	PLANTER WITH GRASS SHRUBS, SMALL TREES	AT GRADE PERMEABLE COVER
6	DRAINAGE SWALE	GRAVEL/COBBLE LINED CONCRETE CULVERT (BENEATH EAST-CENTRAL HIDE PILE REMEDIATED SLOPE)
7	DRAINAGE SWALE	ABOVE GRADE PERMEABLE COVER (WETLANDS REMEDIATION)
9	WETLANDS	DREDGE SEDIMENT, PLACE PERMEABLE COVER (WETLANDS REMEDIATION)
10	WETLANDS	IMPERMEABLE COVER (EAST HIDE PILE REMEDIATION)
11	EAST HIDE PILE	ABOVE GRADE PERMEABLE COVER (EXTENT OF SOUTH HIDE PILE REMEDIATION)
12	VARIES	ABOVE GRADE PERMEABLE COVER
13	SOUTH HIDE PILE	ABOVE GRADE PERMEABLE COVER
14	EAST CENTRAL HIDE PILE	ABOVE GRADE PERMEABLE COVER
15	DEPRESSION VEGETATION VARIES	AT GRADE PERMEABLE COVER
16	RAILROAD LINES	RAILROAD COVER
17	VARIES	PLACE TRENCH GRASS
18	VARIES	GRAVEL ACCESS ROAD
19	CHROMIUM LAGOONS	FILL ABOVE GRADE PERMEABLE COVER
20	CONCRETE FOUNDATION	CLEAR, CLEAN & PATCH
22	PAVED	REGRADE ABOVE GRADE ASPHALT
23	VARIES	PLACE CULVERT
24	CULVERT	EXTEND CULVERT
25	VARIES	SEE NOTE 4 (SHEET 11-30) (ON REFERENCE PLAN 2)
26	VARIES	ABOVE GRADE ASPHALT COVER
27	VARIES	EXCAVATE, STORMWATER STORAGE, PLACE 18" FILL
28	DRAINAGE CHANNEL	DREDGE 18" SEDIMENT, PLACE GRAVEL/COBBLE LINED
29	EXISTING MDC SEWER SERVICE	RAISE MANHOLES
31	DRAINAGE SWALE	DREDGE 16" GRAVEL/COBBLE (GROUNDWATER RECHARGE BASIN)
32	VARIES	AT GRADE COVER (GRAVEL SURFACE)
33	VARIES	ABOVE GRADE COVER (GRAVEL SURFACE)
34	VARIES	GROUNDWATER TREATMENT PLANT
35	VEGETATION VARIES	AT GRADE ASPHALT COVER
36	WEST HIDE PILE	ABOVE GRADE PERMEABLE COVER
37	VARIES	GRAVEL/COBBLE LINED GREATED WETLAND STREAM
38	VARIES	DETENTION BASIN REMEDIATION IMPERMEABLE COVER
39	VARIES	LIMITS OF RIP RAP = 6" STONE (DRAINAGE SWALE / COBBLE LINED)
40	VARIES	GRAVEL ACCESS ROAD IMPERMEABLE COVER

NOTE:
EXISTING IMPROVEMENTS SHOWN (OUTSIDE THE ENGINEERED COVER) FOR LOT 10-1-2 ARE PER REFERENCE PLAN #3b AND ARE NOT THE RESULT OF A FIELD SURVEY BY THIS OFFICE.

COVER TYPE POINT CHART

NUMBER	NORTHING*	EASTING*
41421	552482.8	698952.2
41422	552474.6	698947.5
41423	552476.0	698948.8
41424	552488.5	698921.2
41425	552555.9	698978.6
41426	552613.1	698950.7
41427	552663.5	698938.0
41428	552681.2	698961.9
41701	552611.3	698991.2
41700	552594.4	698935.8
41699	552604.9	698962.0
41698	552611.1	698956.5
42405	552657.6	698965.2
42406	552672.0	698985.0
42407	552656.0	698954.0
42408	552693.8	698921.5
42409	552672.2	698939.2

* HORIZONTAL POSITION REPRESENTED BY DATA LISTED ABOVE WAS DEVELOPED FROM VARIOUS SOURCES. (SEE NOTES 3 & 4 ON SHEET 1)

RESTRICTED AREAS BY CLASSES OF LAND

CLASS OF LAND	DESCRIPTION
A	MAY CONTAIN CONTAMINATED GROUNDWATER.
B	MAY CONTAIN CONTAMINATED GROUNDWATER, AND MAY CONTAIN CONTAMINATED SOILS. NO COVER WAS REQUIRED WITHIN CLASS B.
C	MAY CONTAIN CONTAMINATED GROUNDWATER, AND CONTAINS CONTAMINATED SOIL AND COVER.
D	MAY CONTAIN CONTAMINATED GROUNDWATER, AND CONTAINS CONTAMINATED SOIL AND COVER. CLASS D ALSO CONTAINS FOUR ANIMAL HIDE PILES.

FINAL

PROFESSIONAL LAND SURVEYOR

PROFESSIONAL ENGINEER

ROUX ASSOCIATES, INC.
Environmental Consulting & Management

MERIDIAN
Land Services, Inc.
ENGINEERS • LAND SURVEYORS • CONSULTANTS • LAND PLANNERS

Golden Associates
Monmouth, New Hampshire
400 Commercial Street
Monmouth, N.H. USA 03101
603-668-0880 • FAX 603-668-1199

PROJECT RECORD (TAX MAP LOT 10-1-2)

COVER TYPES AND TRANSITIONS

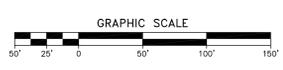
INDUSTRI-PLEX SITE REMEDIAL TRUST
WOBURN, MASSACHUSETTS

DESIGNED BY: MDP
DRAFTED BY: CAC
CHECKED BY: JGK

B-39

SHEET NO. _____
PROJECT: 29005.00
FILE: 29005014.dwg
DO NOT SCALE DRAWING

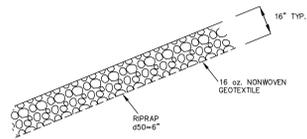
AUGUST 8, 2000
SCALE: 1" = 40'



COVER TYPE

6

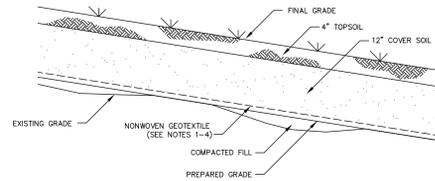
ENGINEERED DRAINAGE SWALE/COBBLE LINED
NOT TO SCALE



COVER TYPE

12

ABOVE GRADE ENGINEERED PERMEABLE COVER
FOR SLOPES FLATTER THAN 25%
NOT TO SCALE

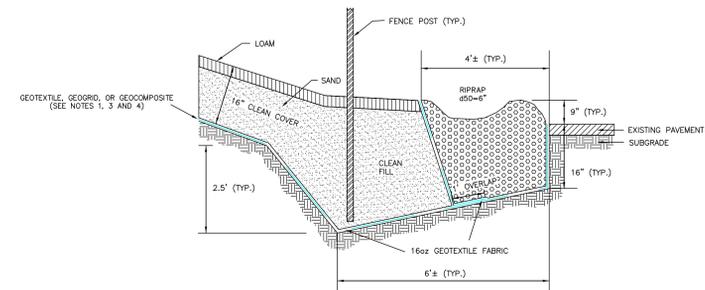


LEGEND

- A — DETAIL/CROSS SECTION DESIGNATION
- B-40 — SHEET No. WHERE DETAIL/CROSS SECTION IS PRESENTED

NOTES

- 1.) SEE SPECIFICATIONS FOR DETAILS AND MATERIALS USED.
- 2.) FOR SLOPES FLATTER THAN 25% A 16oz. NONWOVEN GEOTEXTILE WAS INSTALLED ON HIDE PILES AND A 6oz. NONWOVEN GEOTEXTILE WAS INSTALLED ELSEWHERE.
- 3.) FOR SLOPES 25% OR STEEPER, A GEOSYNTHETIC DRAIN WAS USED AS FOLLOWS:
 - a. ON HIDE PILES, A GEOCOMPOSITE DRAIN WAS EXTENDED FROM THE TOE OF SLOPE A DISTANCE EQUAL TO A 10 FOOT CHANGE IN ELEVATION, A 16oz. NONWOVEN GEOTEXTILE WAS USED ELSEWHERE AND FIELD SEWN WITH THE GEOCOMPOSITE.
 - b. IN AREAS OTHER THAN HIDE PILES, A 16oz. NONWOVEN GEOTEXTILE WAS USED THROUGHOUT.
- 4.) FOR SLOPES STEEPER THAN 33%, A GEOGRID WAS PLACED DIRECTLY ABOVE THE GEOSYNTHETIC AND EXTENDED A DISTANCE OF 10 FEET BEYOND THE CREST OF THE SLOPE. FOR SLOPES 50% OR STEEPER A RIPRAP FACING WAS PLACED WITHOUT GEOGRID.



2
B-40

**ENGINEERED FENCE TRENCH
ADJACENT TO PAVEMENT**
NOT TO SCALE

FINAL

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& Management

MERIDIAN
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ENGINEERS • LAND SURVEYORS • CONSULTANTS • LAND PLANNERS

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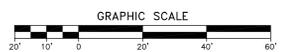
PROJECT RECORD (LOT 10-1-2)

DETAILS & TRANSITIONS

INDUSTRI-PLEX SITE REMEDIAL TRUST
WOBURN, MASSACHUSETTS

SCALE: 1" = NONE
AUGUST 8, 2000

DESIGNED BY: MDP	B-40
DRAFTED BY: CAC	SHEET NO.
CHECKED BY: JGK	PROJECT: 29005.00
FILE: 29005010.dwg	SHEET 5 OF 5



DATE	ISSUE	DESCRIPTION
8/12/00	MP	PROFESSIONAL LAND SURVEYOR
8/12/00	MP	PROFESSIONAL ENGINEER
8/12/00	MP	PROFESSIONAL LAND PLANNER

PROFESSIONAL LAND SURVEYOR

PROFESSIONAL ENGINEER

PROFESSIONAL LAND PLANNER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

ONE CONGRESS STREET SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

April 25, 2008

Thomas Alperin
112 Commerce Way LLC
2310 Washington Street
Newton Lower Falls, MA 02472

Re: Industri-plex Superfund Site, Operable Unit 1: Final Property-Specific Cover Certification Report for 112 Commerce Way, Woburn, MA, (Tax Map 10-1-2).

Please find attached the property-specific final Cover Certification Report (CCR) for your property located at 112 Commerce Way, Woburn, MA, (Tax Map 10-1-2), formerly owned by Pacer Headquarters, Inc. This CCR documents the completion of a portion of the Remedial Action for soil, sediments, and air at the Industri-Plex Superfund Site, Operable Unit 1, Woburn, MA, in accordance with approved 100% Design Report, dated April 1992. The Remedial Action implemented on your property was required by the Consent Decree entered on April 24, 1989 by the United States District Court for the District of Massachusetts in the matter styled United States v. Stauffer Chemical Company et al., Civil Action No. 89-0195-MC, and Commonwealth of Massachusetts v. Stauffer Chemical Company et al., Civil Action No. 89-0196-MC.

The CCR contains detailed full-size Record Drawings illustrating the Remedial Action implemented on your property, such as the location of Engineered and/or Equivalent Covers which serve as barriers preventing contact to the underlying Contaminated Soils. The Record Drawings also illustrate the location of various land classifications designated on your property (i.e. Land Class A, B, C and/or D), which represent various conditions and restrictions. The details contained in the CCR, particularly the Record Drawings, will be useful towards ensuring the long protectiveness of the remedy and compliance with institutional controls (i.e. Grant of Environmental Restriction).

In addition to the CCR, your are also being provided:

- 1) a set of half-size Record Drawings; and
- 2) a compact disc containing electronic versions of the CCR, as well as electronic CAD files of the Record Drawings.

The half-size drawings will be useful towards your periodic inspection of the remedial action implemented on your property, as well as any consideration you may have towards implementing future intrusive work on the property that may affect the remedial action. If you elect to alter the

