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30 July 2009  
File No. 11845-146

Mr. Joseph F. LeMay, P.E.  
Remedial Project Manager  
United States Environmental Protection Agency - Region 1  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

Subject: 112 Commerce Way Development  
Completion Report Letter  
Woburn, Massachusetts

Dear Mr. LeMay:

Construction activities at the 112 Commerce Way Development in Woburn, Massachusetts have been completed. On behalf of the project owner, 112 Commerce Way LLC, we have prepared this Completion Report Letter to fulfill the requirements of Appendix IV, Section III, subparagraph 11 of the Grant of Environmental Restriction and Easement (Grant), dated 28 March 2009.

The project site is located within the bounds of the Industri-Plex Superfund Site, specifically within areas of Industri-Plex site classified as "Class B" and "Class C" land; however, construction activities were undertaken only in areas of the site classified as "Class B" land. No "Class C" land was disturbed as part of the development activities.

Haley & Aldrich, Inc. (Haley & Aldrich) served as the Independent Professional for the project. Representatives of Haley & Aldrich or our Health and Safety Subconsultant, Cashins & Associates, Inc. (Cashins), were present at the site on a full-time basis for the majority of the intrusive construction. With EPA approval, Haley & Aldrich reduced their presence to part-time monitoring near the end of the project when limited intrusive activities were occurring. During July 2009 following completion of construction activities, the Independent Professional and the Owner visited and reviewed the site in accordance with the Closure Process outlined in the approved work plan.

To the best of our knowledge based on our observations and information provided by project team members, the intrusive activities at the site were undertaken in compliance with the approved Work Plan dated 23 July 2008 and Section IV ("Technical Requirements") of Appendix IV of the Grant, with the exception of the approved variances outlined in the attached Table I. The variances were discussed with and approved in writing by the EPA before the activities were undertaken. Please refer to the attached Table I for further details.

A summary of the earthwork-related construction activities undertaken at the site and the results of the required air monitoring are contained in Haley & Aldrich Weekly Field Report numbers 1 through 18 and Cashins Daily Health and Safety Summary Reports dated 2 September through 17 December 2008. The referenced reports were previously submitted to the EPA under separate cover. Analytical test data obtained from soil and groundwater samples collected on the site and of materials imported to the site (crushed stone and soil) were also previously transmitted to the EPA under separate cover. The attached redline versions of the site utility and grading plans prepared by Maverick Construction; indicate the as-built locations and elevations of the new building structures, utilities and surface grading.

As indicated in the approved Work Plan, construction at the site included permanent modifications to the existing South Hide Pile geotextile cover located within "Class B" areas of the site. The attached Figures titled "Cover Modifications", Sheets 1 and 2, dated 28 July 2009 and prepared by Maverick Construction; provide an As-built record of the cover modifications that were performed. To the best of our knowledge, the cover modifications undertaken at the site were completed in compliance with the approved Work Plan (including variances) and Section IV ("Technical Requirements") of Appendix IV of the Grant. It is our opinion that the new cover as constructed and represented on the referenced as-built plan provides protection of human health and the environment equivalent to the previous cover.

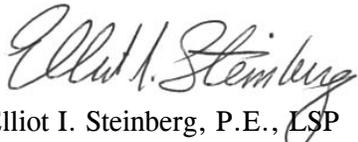
Paul Ozarowski, P.E., LSP was listed as the Independent Professional in the approved Work Plan, however, due to staffing changes, Mr. Elliot I. Steinberg, P.E., LSP of Haley & Aldrich has assumed the responsibilities of Independent Professional for the project. In accordance with the provisions for an Independent Professional outlined in the Grant, Appendix I, Paragraph V., Mr. Steinberg is a licensed Hazardous Waste Site Cleanup Professional (LSP) and Professional Engineer (P.E., Civil), and has reviewed the Grant and the approved work plan to become familiar with the requirements of the Grant including its appendices as described in the approved Work Plan. Mr. Steinberg was also briefed on the project background, construction activities and encountered conditions by the Haley & Aldrich Project Manager and Officer in Charge, and visited the site with the Haley & Aldrich Project Manager during July 2009 to view site conditions first hand.

On behalf of our client and the 112 Commerce Way project team, we thank the EPA for its cooperation, guidance and consideration during this project. Please feel free to contact the undersigned if you wish to discuss any aspect of this Completion Report Letter.

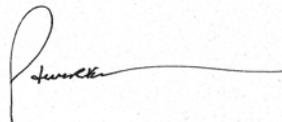
Sincerely yours,  
HALEY & ALDRICH, INC.



Michael J. Weaver, P.E.



Elliot I. Steinberg, P.E., LSP  
Vice President / Independent Professional



Steven R. Kraemer, P.E., D. GE  
Senior Vice President

Attachments:

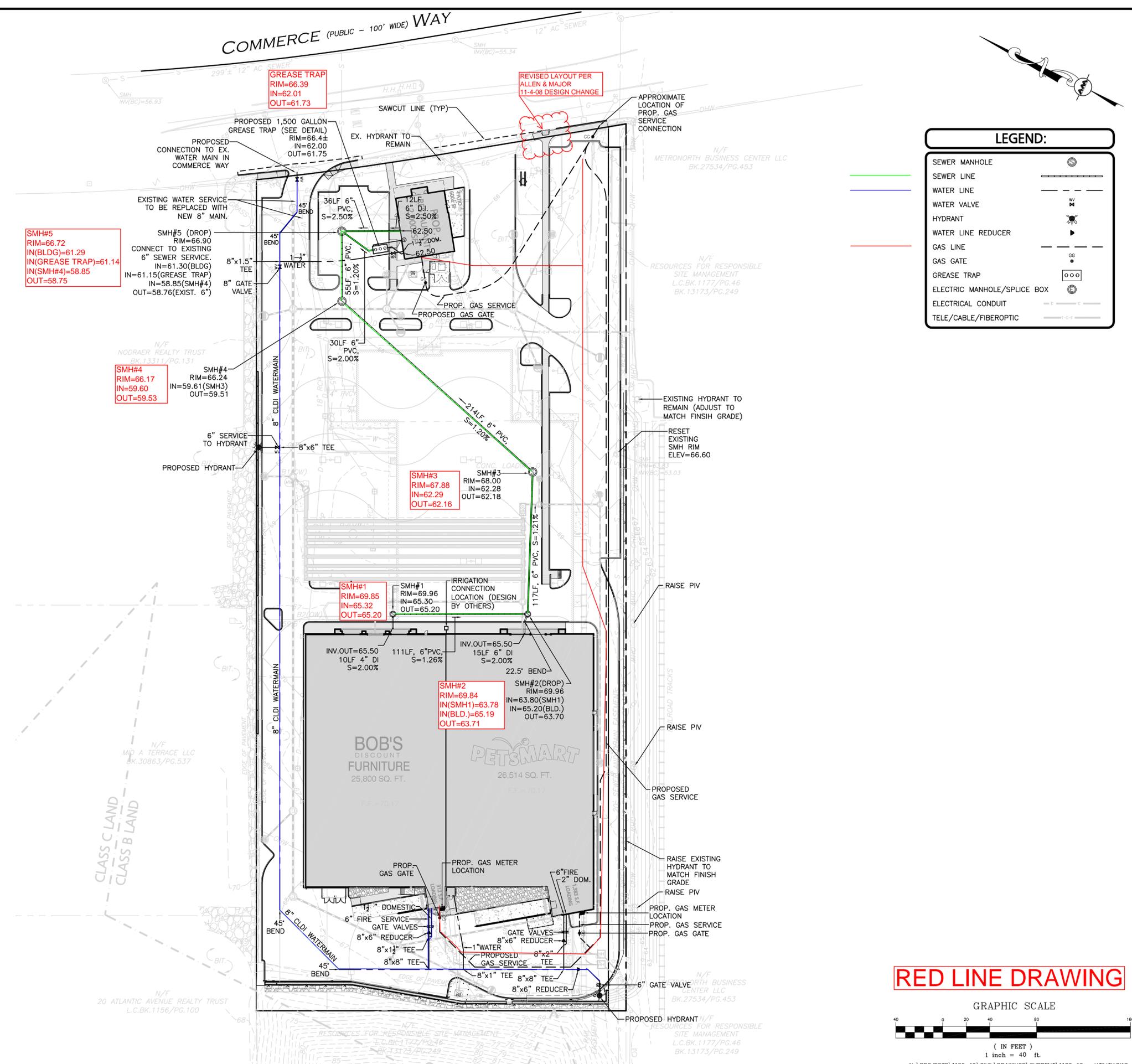
- Table I - Approved Variances From Work Plan
- Figures - Redline Versions of Site Grading and Drainage and Utility Plans (3 Sheets)
- Figures - "Cover Locations" - Sheet Numbers 1 and 2 (2- Sheets)

c: Massachusetts DEP; Attn: Jennifer McWeeney

**TABLE I - APPROVED VARIANCES FROM WORK PLAN**  
**112 Commerce Way Development**  
**Woburn, Massachusetts**

<b>Date Submitted to EPA</b>	<b>Date of EPA Approval</b>	<b>Issue</b>	<b>Conditions for Approval</b>
12/17/2008	12/17/2008	Daily air monitoring and contaminated materials oversight by SHSO to be suspended because on-going excavation is minimal.	None.
11/25/2008	12/2/2008	Alternate site retaining wall construction procedure along west side of site. Existing geotextile to be located by hand-digging holes 10-ft on center. Soils overlaying fabric to be removed by mini-excavator.	Test holes to indicate geotextile is relatively flat, excavation with rubber blade and within 6-inches of geotextile, H&A to have full-time representation, and work to stop if geotextile damaged.
11/11/2008	11/13/2008	Selection of topsoil for the site. Contractor supplied analytical test data for 6 samples that did not meet all criteria in Table I of Work Plan.	EPA approved use of material from Linden Street in Waltham, MA.
10/27/2008	10/30/2008	Proposal to segregate, decontaminate, and re-use gravel material encountered within the infiltration basin to construct the slope on the south side of the site.	Dust suppression as necessary, inspect washed rock prior to placement, and minimize suspended solids to the fractational tank.
10/15/2008	10/16/2008	Use of Earthstop 500 (polymer spray) to cover stockpiles at night in lieu of tarps.	Spray material only on piles. No over-spraying on adjacent properties/roadways.
10/1/2008	10/6/2008	Treatment and on-site re-use of dewatering effluent generated during installation of deeper utilities, for dust suppression.	Testing protocols and groundwater zones established by the EPA.
9/26/2009	10/3/2009	Stockpiles of clean imported materials and clean reclaimed asphalt and concrete to be stockpiled outside the SMMA.	None.
9/26/2009	10/3/2009	Leave some existing utility structures in place and fill with flowable fill rather than excavate and remove them.	Utilities abandoned in place to be located by owner in case future excavations will cross the area.
9/9/2008	9/10/2008	SMMA to be constructed using earth berms in lieu of concrete barriers.	Earth berms elevated around perimeter and a second layer of HDPE be placed in the SMMA prior to transportation of soils.
9/4/2008	9/4/2008	Soil samples to be removed from the site for geotechnical testing.	Material to be returned when testing is completed.

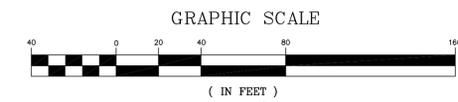
**Haley & Aldrich File No. 11845-146**



**LEGEND:**

SEWER MANHOLE	⊙
SEWER LINE	— — — — —
WATER LINE	— — — — —
WATER VALVE	⊕
HYDRANT	⊙
WATER LINE REDUCER	▶
GAS LINE	— — — — —
GAS GATE	⊙
GREASE TRAP	⊙
ELECTRIC MANHOLE/SPLICE BOX	⊙
ELECTRICAL CONDUIT	— — — — —
TELE/CABLE/FIBEROPTIC	— — — — —

**RED LINE DRAWING**



PROFESSIONAL ENGINEER FOR  
ALLEN & MAJOR ASSOCIATES, INC.

REV	DATE	DESCRIPTION
5	10-24-08	REVISE SMH1, SMH2 & SMH3 RIMS
4	08-21-08	REVISED SEWER INVERTS
3	07-16-08	PER WOBURN DPW COMMENTS
2	07-11-08	PIPE STORAGE / DETENTION
1	06-01-08	M.E.P. UTILITY COORDINATION

APPLICANT/OWNER:  
**NATIONAL DEVELOPMENT**  
2310 WASHINGTON STREET  
NEWTON LOWER FALLS, MA 02462

PROJECT:  
**112 COMMERCE WAY**  
WOBURN, MA

PROJECT NO.	1126-19	DATE:	03-14-08
SCALE:	1"=40'	DWG. NAME:	C1126-19
DESIGNED BY:	BDJ	CHECKED BY:	TJW

PREPARED BY:

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environmental consulting • landscape architecture  
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FAX: (781) 933-2896  
WOBURN, MA • MIDDLEBORO, MA • MANCHESTER, NH

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DRAWING TITLE:	SHEET No.
<b>PROPOSED UTILITY PLAN</b>	<b>C-4</b>

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**CATCH BASIN ACTUAL ELEVATIONS**

STRUCTURE	RIM	INVERT OUT
CB1a	66.32	63.53
CB1b	68.11	64.85
CB3	67.90	64.35
CB4a	68.75	65.97
CB4b	67.48	64.97
CB5	67.85	64.71
CB9	67.84	64.62
CB11a	65.33	62.55
CB11b	65.67	62.77
CB11c	65.41	62.64
CB11d	65.56	63.11
CB12a	66.09	63.26
CB12b	65.59	61.80
CB12c	65.46	61.96
CB13	65.44	62.00

**OIL-WATER SEPARATOR ACTUAL ELEVATIONS**

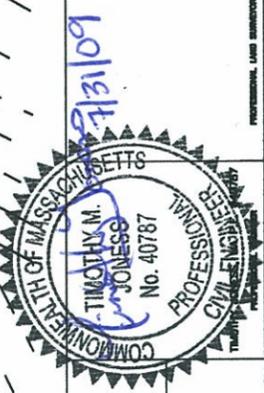
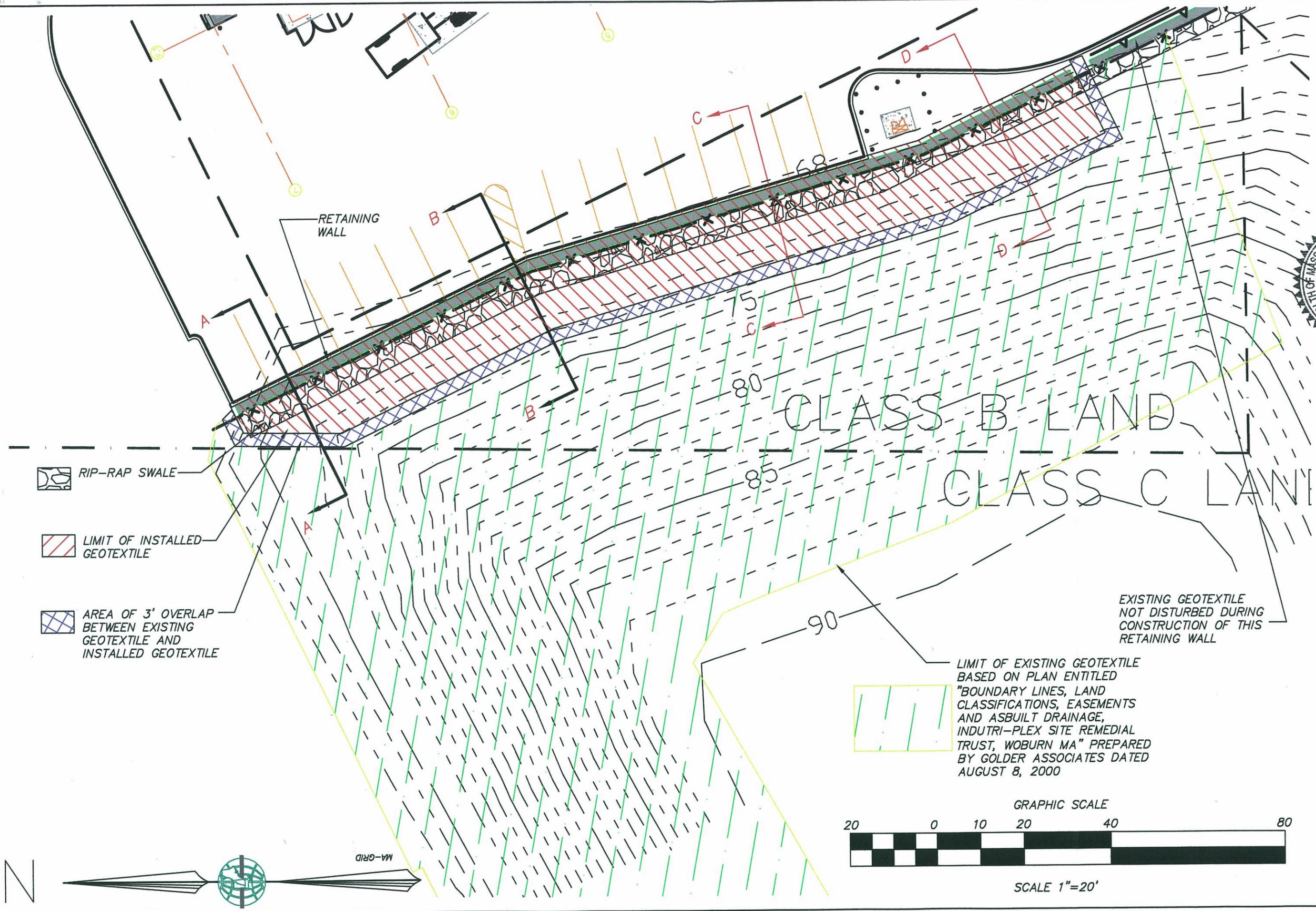
STRUCTURE	RIM	INVERT IN	INVERT OUT
OWS-A	66.95	64.28(T.D.)	64.03
OWS-B	69.96	64.45(T.D.)	64.21

**DRAINAGE MANHOLE ACTUAL ELEVATIONS**

STRUCTURE	RIM	INVERT IN	INVERT IN	INVERT IN	INVERT OUT
DMH1	66.41	63.41(CB1a)	63.57(CB1b)	63.56(OWS-A,B)	63.32
DMH2	67.81	62.85(DMH1)	-	-	62.81
DMH3	68.68	63.75(CB3)	62.51(DMH2)	-	62.47
DMH4	67.80	64.86(CB4a)	64.87(CB4b)	-	64.77
DMH5	68.25	64.53(CB5)	64.52(DMH4)	-	64.42
DMH6	69.78	65.95(ROOF)	-	-	65.71
DMH7	69.78	64.48(DMH6)	65.95(ROOF)	-	62.73
DMH8	68.77	61.58(36")	-	-	61.48
DMH9	68.35	64.20(CB9)	61.36(DMH8)	61.36(DMH3)	61.14
DMH10	-	-	-	-	-
DMH11	66.26	62.11(CB11a,b)	62.10(CB11c)	62.13(CB11d)	61.84
DMH12	65.83	61.58(CB12a,b,c)	61.56(ROOF)	61.32(DMH11)	61.08
DMH13	66.01	61.55(CB13)	60.58(DMH12)	60.60(DMH9)	60.48
DMH14	-	-	-	-	-
DMH15	67.02	60.10(DMH10)	-	-	59.49

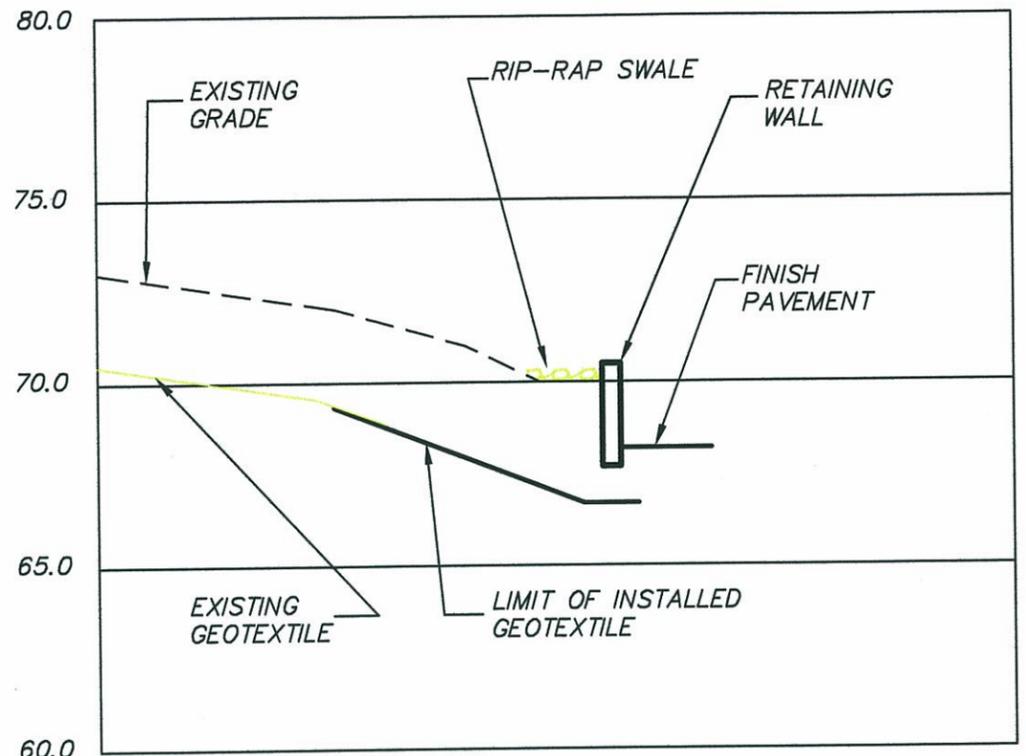
**Notes:**

1. ALL ELEVATIONS REFER TO NGVD '29.
- 2.

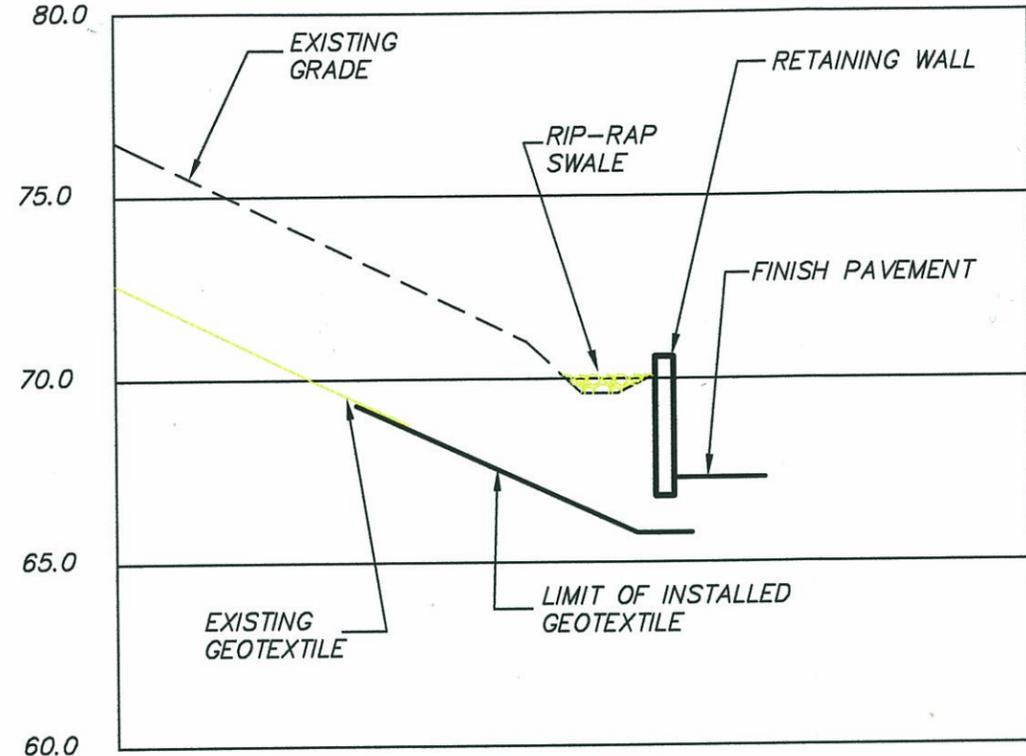



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 MAVERICK  
 Construction Management Services, Inc.

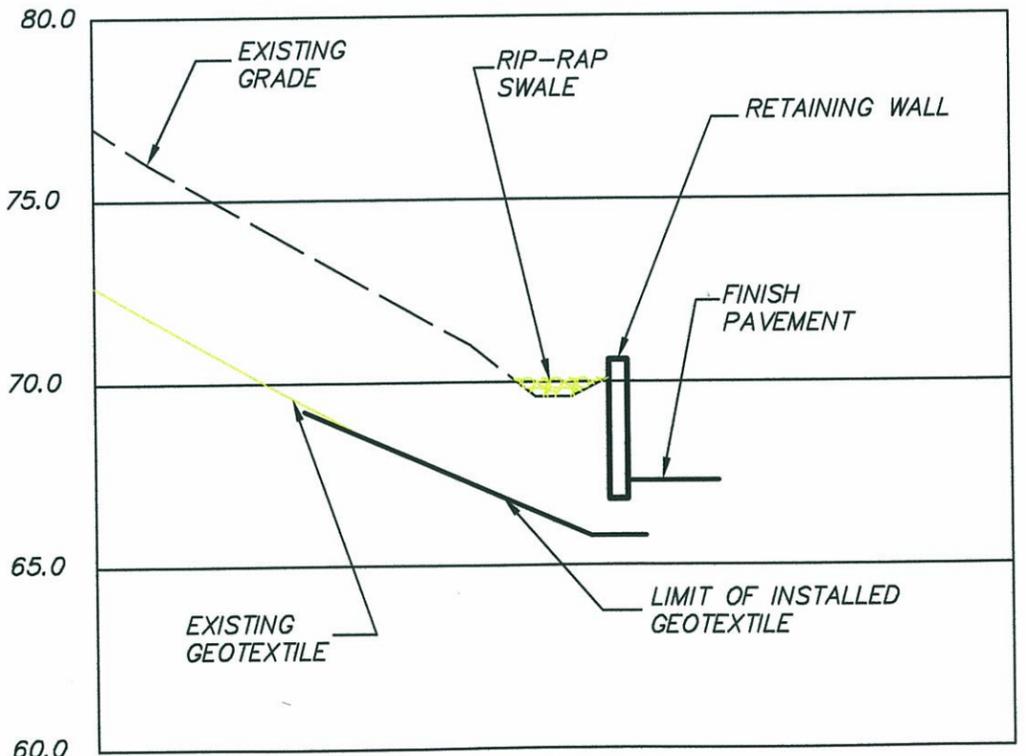
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DESIGNED BY: JAF	DRAWN BY: HIL	CHECKED BY: JAF	SHEET NO. 1
FILE: 0802-07	PROJECT: 0802	NO. OF SHEETS: 0802	SHEET: 1-07-1



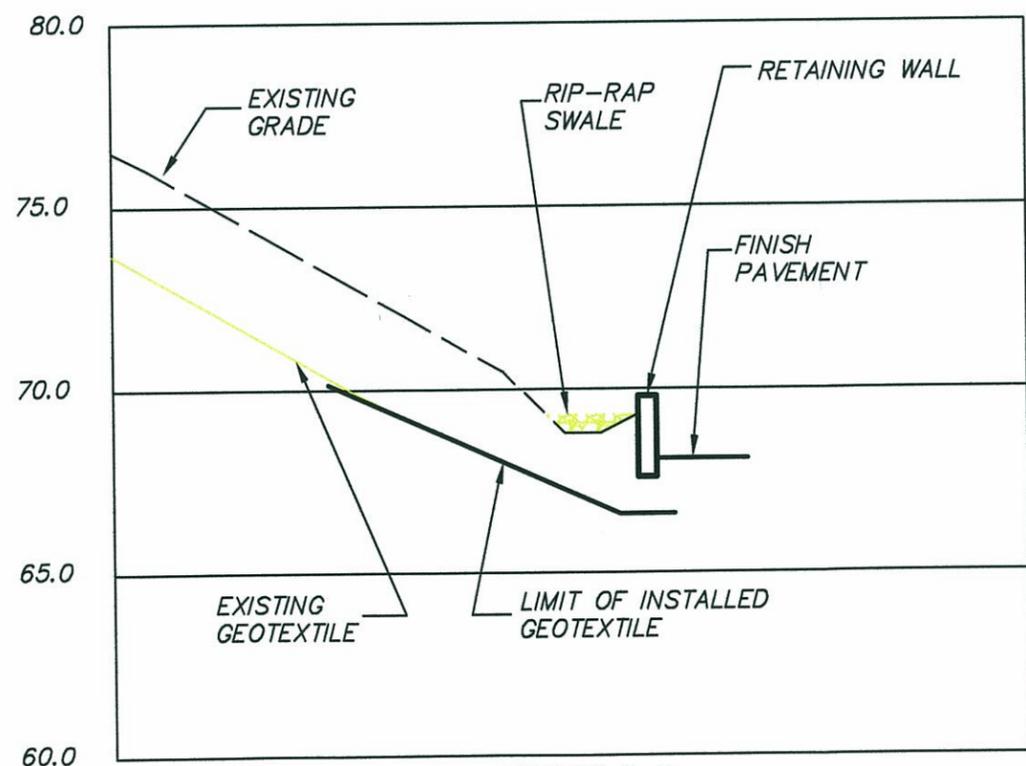
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 1"=5' VERTICAL



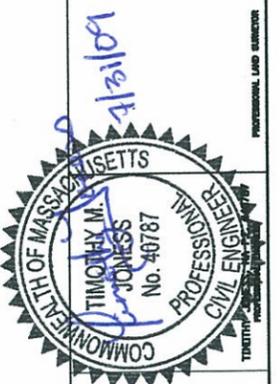
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 1"=5' VERTICAL



**SECTION C-C**  
 1"=10' HORIZONTAL  
 1"=5' VERTICAL



**SECTION D-D**  
 1"=10' HORIZONTAL  
 1"=5' VERTICAL



PREPARED BY:  
**M**  
 MAVERICK  
 Construction Management Services, Inc.

COVER LOCATIONS  
 112 COMMERCE WAY  
 WOBURN, MASSACHUSETTS  
 SCALE: AS NOTED | DATE: JULY 28, 2009

DESIGNED BY: JAF	2
DRAWN BY: JAF	SHEET NO.
CHECKED BY: JAF	PROJECT CODE
FILE: 0602-07	SHEET: 2-01-2