- DRAFT -
PUBLIC INVOLVEMENT PLAN

FORMER LUNT SILVERSMITH
298 FEDERAL STREET
GREENFIELD, MASSCHUSETTS 01301

RTN #1-18869

Submitted to:

Massachusetts Department of Environmental Protection
Western Regional Office
436 Dwight Street
Springfield, MA 01103

Prepared by:

OHI Engineering, Inc.
110 Pulpit Hill Road
Amherst, Massachusetts 01002

OHI Project #23-2322

November 21, 2024

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1.0 INTRODUCTION

On behalf of the City of Greenfield and the Lunt Neighborhood Action Group (LNAG), OHI Engineering, Inc. (OHI) prepared this Public Involvement Plan (PIP) for Release Tracking Number (RTN) 1-18869 located at 298 Federal Street in Greenfield, Massachusetts (see **Figure 1** Locus Map). Much of the Site-specific information presented herein is from the vast library of reports and information generated by O'Reily, Talbot & Okun (OTO) who have conducted assessment and remediation at this Site on behalf of 401 Liberty, Inc. (401 Liberty) since 2012. Information from the EPA and MassDEP assessment and remediation activities has also been incorporated.

1.1 Explanation of Public Involvement Plan Process

The Massachusetts Contingency Plan (MCP), 310 CMR 40.0000, is the state regulation that governs notification, assessment, and remediation of releases of oil and/ or hazardous materials to the environment. Under the MCP and M.G.L. c. 21E, the Massachusetts Department of Environmental Protection (MassDEP) is responsible for ensuring that response actions are conducted properly. Response actions at a disposal site are overseen by a Licensed Site Professional (LSP), an environmental expert licensed by an independent state board, to manage cleanups and provide opinions that site work meets state requirements.

Under M.G.L. c. 21E, MassDEP is responsible for overseeing remedial response actions at sites at which oil or hazardous materials have been released to the environment. Remedial response actions include determining the nature, source and extent of the release; evaluating the risk posed by the site to human health safety and welfare and to the environment; determining whether cleanup actions are necessary and if necessary, implementing appropriate actions. The remedial response action process is established by the MCP.

The MCP includes provisions (310 CMR 40.1400) for public involvement activities during the response action process for regulated releases of oil and/or hazardous materials. The public activities are undertaken to ensure that the public is informed of and involved in planning response actions. The public may petition MassDEP and the Potentially Responsible Party (PRP) to take an active role in the planning of remedial response actions at a disposal site. Within 20 days of receipt of the petition, the PRP is obligated to designate an eligible site as a PIP site.

On or about December 1, 2021 the City of Greenfield received a notice from the Lunt Neighborhood Action Group (LNAG) requesting that the former Lunt Silversmiths site (the "Site) located at 298 Federal Street in Greenfield, Massachusetts to be designated as a Public Involvement Plan (PIP) site, under Massachusetts General Laws Chapter 21E (M.G.L. c.21E) and the MCP [310 CMR 40.1400]. In response to the petitions filed, the City forwarded such notice to 401 Liberty Street, LLC ("401 Liberty"), the Site tenant and party conducting environmental assessment and remediation at the site to date. 401 Liberty designated the Site as a PIP site pursuant to the MCP, hired OTO to write a *Public Involvement Plan* (OTO, 2022. Copy in **Appendix A**) and was responsible for implementing the *Public Involvement Plan.*

1.2 Outreach

A public repository was to be established for the site in the Greenfield Public Library, 402 Main Street in Greenfield Massachusetts, and regular PIP meetings were to have taken place to inform the public of assessment and remediation progress.

The repository was not established and only one PIP meeting was convened (January 11, 2022) by 401 Liberty wherein the public was not informed of progress and public input was cut short by the moderator, the owner of 401 Liberty who was not a neutral party to the process. Public input that was provided was largely ignored in the updated Phase II SOW, and the frustration generated led to this revised PIP Plan.

On behalf of the LNAG, OHI has established a public repository at the Greenfield Public Library, 402 Main Street in Greenfield Massachusetts. The LNAG held one public hearing/PIP meeting on Feb 28, 2024 where recent sampling results generated by OTO were presented by OHI. A second PIP meeting was held on September 17, 2024, in part to introduce this revised PIP Plan, and a third will be held to discuss this revised PIP Plan and receive input from interested parties.

1.4 DRAFT Public Involvement Plan

This DRAFT PIP for RTN 1-18869, 298 Federal Street, Greenfield, Massachusetts was submitted to the information repository and MassDEP in October 2024. The DRAFT PIP was prepared by OHI Engineering, Inc. for the Lunt Neighborhood Action Group in accordance with the requirements of the MCP as outlined in 310 CMR 40.1400. A Final PIP will be prepared after the public comment period for the DRAFT PIP. As Site owner, the City of Greenfield has hired OHI to implement the PIP process on their behalf.

- **Sections 2 through 7** of the PIP present background information of the Site, including Site, environmental assessment, and public involvement histories.
- **Sections 9 & 10** describe how public involvement activities will be conducted during remedial actions and how the Public Involvement Plan process will address community concerns that have been raised during the development of the PIP.
- **Section 11** outlines a schedule for public involvement activities.

- **Table 1** summarizes soil sampling analytical data collected and
- **Table 2** summarizes groundwater sampling analytical data.

- **Figure 1** shows the location of the Property on a topographic map.
- **Figure 2** shows an aerial photograph of the Site.
- **Figure 3** is the Assessors Map of the area.
- **Figure 4** is the MassDEP Priority Resource Map.
- **Figure 5** shows historical groundwater data for TCE and the extent of contamination.

- **Figure 6** shows the location of catch basin and outfall sampling locations.

- **Appendixes** include:

Appendix A	PIP Petition
Appendix B	PIP Recognition Letter
Appendix C	Invitation to Petitioners Meeting
Appendix D	Responses to Questions - Petitioners Meeting
Appendix E	Public Notification of Draft PIP Public Meeting
Appendix F	Public Presentation Slide Show and Sign in Sheet
Appendix G	Questions/Comments and Responses to Questions – Draft PIP
Appendix H	Mailing List (Current September 4, 2024)

This Draft PIP was introduced at a public meeting held via Zoom from the City Hall, Greenfield, Massachusetts at 7:00 PM on September 17, 2024. This Draft PIP will be discussed and comments received at a public meeting held via Zoom from the City Hall, Greenfield, Massachusetts at 7:00 PM on December 10, 2024. PIP comments are encouraged will be accepted for 20 days following the public meeting, until December 27, 2024.

During the required public meeting for the DRAFT PIP, comments and questions will be solicited in a public forum and answers will be provided in the meeting. OTO/401 Liberty will be invited to the meeting to provide answers and insight on results of sampling they conducted. Lori McCarthy, LSP at OTO continues to provide response actions at the Site on behalf of 401 Liberty. OHI will work with OTO to provide information to the public about the Site, assessment and remedial measures conducted, and those still to be completed. OHI will request that any public comments/questions requiring written answers be submitted in writing (email/letter). LNAG/OHI will send a notice of availability of the Draft PIP to the PIP mailing list.

The City of Greenfield is implementing public involvement activities for RTN 1-18869 with the assistance of OHI Engineering. OHI Engineering, Inc. is an independent environmental and engineering services company that provides consulting services for private, industrial, commercial and public sector clients. Lyons Witten of OHI Engineering, Inc. is the Licensed Site Professional (LSP) who will implement the PIP on behalf of the City of Greenfield.

Comments during the Public Meeting and comments received by mail will be addressed in the final PIP.

1.5 Contact Information

Contact information regarding the persons assuming responsibility for conducting the Response Actions is provided as follows:

Primary Contact information for the PIP is:
(PLEASE PROVIDE ALL QUESTIONS OR COMMENTS TO THIS CONTACT)

Name:	Lyons Witten, PG, LSP (#8066)
	OHI Engineering, Inc.
Address:	110 Pulpit Hill Road
	Amherst, MA 01002
Telephone:	(413) 835-0780
Email:	lwitten@ohiengineering.com
Relationship to Site:	Agent

Contact information for the PRP is:

Name:	Mayor Desorger
Address:	Mayor's Office
	14 Court Square
	Greenfield, MA 01301
email:	Mayor@Greenfield-ma.gov
Relationship to Site:	Representative of Owner

Contact information for the Licensed Site Professional is:

Name:	Lori A. McCarthy, LSP (#7713)
	OTO Engineering Associates
Address:	293 Bridge Street, Suite 500
	Springfield, MA 01103
Emai:	Mccarthy@oto-env.com
Telephone:	(413) 788 – 6222
Relationship to Site:	LSP for 401 Liberty

Contact information for 410 Liberty is:

Name:	Raipher Pellegrino
	Manager of 401 Liberty Street, LLC
Address:	rpd@raipher.com
Relationship to Site:	Tenant with long-term lease.

Contact information for the MassDEP is:

Name:	MassDEP Western Regional Office (WERO)
Address:	436 Dwight Street Springfield, MA 01103
Contact person:	Kimberly Longridge, Acting Audits Section Chief
email:	Kimberly.Longridge@mass.gov

2.0 PROPERTY CHARACTERISTICS

The Property is currently owned by the City of Greenfield and leased to 401 Liberty which has redeveloped the Property from its former industrial past to offices and health care facilities, some of which provide long-term residential treatment programs.

The Property is currently occupied by Clinical & Support Options Inc. (CSO) a nonprofit community behavioral and mental health agency providing therapy, counseling, and family support services, and by Behavioral Health Network, Inc. (BHN) a regional provider of comprehensive behavioral health services for adults, children and families operating the Franklin [opioid] Recovery Center and Northern Hope Center.

The site has been used for industrial purposes for over 100 years. Past use of the facility was primarily silverware manufacturing, but over the years included other products such as bicycle, car and airplane parts, surgical equipment, and military supplies. The former Lunt Silversmiths factory operated from 1902 until approximately 2010. Lunt Silversmiths manufactured pewter utensils, silver plating and sterling silverware, silver plating tableware and hollowware.

The primary contaminants of concern (COCs) which have been identified in Site soils are the metals antimony, arsenic, lead and silver, and the chlorinated solvent trichloroethylene (TCE). Most locations with elevated metals concentrations were located in shallow soils in five locations which were subsequently excavated. Some metals-impacted soils remain at the Site.

The primary COC identified in groundwater is trichloroethylene (TCE). Related chlorinated volatile organic compounds (CVOCs) found above standards but at lower concentrations and frequency include tetrachloroethylene (perchloroethylene or PCE) and cis-1,2-Dichloroethylene (DCE). TCE has been identified as migrating off-Site in groundwater and discharging into the adjacent storm sewer pipe under Kenwood Street.

PCE, TCE, and DCE have all been identified in indoor air of on-Site buildings. TCE, and DCE have been identified in indoor air of off-Site residential buildings south of Kenwood Street.

Further Response Actions will be necessary to achieve a Condition of No Significant Risk pursuant to 310 CMR 40.0900, and a Permanent Solution Statement (PSS) pursuant to 310 CMR 40.1000.

2.1 General Site Information

The Site is a Limited Commercial (LC) zoned property located at 298 Federal Street in Greenfield, Massachusetts (**Figures 1-2**). The property is identified in City of Greenfield assessor's records as parcel 95-1-UTB and includes approximately 3.8 acres of land (**Figure 3**). Assessor's records indicate the original Site building was constructed in 1850. The site buildings were previously serviced by municipal water and sewer systems. Multiple additions were made to the building over time. The former Lunt property was listed as having a finished area of

approximately 74,280 square feet prior to demolition activities in 2015 and 2016. The square footage likely includes the northeast corner building (Unit A1) not included in the DEP Site. The current size of building footprints of the Site (not including off-Site Unit A1) is estimated at approximately 25,000 square feet. The series of interconnected buildings include one- and two-story portions constructed primarily of brick.

The property containing the Site is bounded by Norwood Street on the north, Federal Street on the east, Kenwood Street on the south, and baseball fields then Davis Street on the west. Residential neighborhoods are located to the north, south, and west. Development to the east, along Federal Street, is primarily commercial. Exterior portions of the site include paved parking areas on the east and west sides of the building. A paved parking area is located on the east side of the building, near the main entrance. Local topography is generally flat and slopes gently downward to the west, toward the Green River, which is located approximately 5,500 feet to the west. The nearest surface water body is the Connecticut River, which is located approximately 4,000 feet to the east of the site (**Figure 4**).

2.2 Surrounding Land Uses

The Subject Property is surrounded primarily by commercial properties to the East and residential properties to the North and South, and recreational ball fields to the West as follows:

North – Residential properties abut the Site to the north with an Aubuchon Hardware store on the corner of Federal and Norwood.

South – Residential properties abut the Site to the south with Goly's Garage Auto Care Center on the corner of Federal and Kenwood.

West – Municipal ball fields.

East – A Cumberland Farms convenience store gas station, a Sandri convenience store gas station, and a Tire Warehouse franchise exist on the east side of Federal Street across from the Site. Further east are residential properties.

2.3 On-Site Aboveground and Underground Storage Tanks

The site buildings were previously serviced by municipal water and sewer systems and were heated by fuel oil. Heating oil was stored in a 30,000-gallon aboveground storage tank (AST) constructed on the northwest corner of the site building. The tank was enclosed in a concrete and cinderblock building. Municipal water and sewer continue to service the Site.

No underground storage tanks (USTs) are known to be present or to have existed at the Site.

3.0 COMPLETED RESPONSE ACTIONS AND SUMMARY OF RELEASE HISTORY

Assessment and remediation activities have been on-going at a slow and sporadic pace at the Site since 2012. Activities completed have primarily aided the redevelopment of the Site into offices and clinical space, along with investigations into the extent of soil, sediment, groundwater and indoor air contamination by metals and CVOCs, primarily TCE.

Soil remediation has been conducted in select areas removing the most contaminated soils at the surface but leaving metals impacted soil in areas with reduced exposure to humans.

Vapor intrusion by CVOCs into indoor air at Site buildings was reduced by the implementation of passive exposure pathway mitigation measures (PEPMM) in select on-site building basements.

Soil impacted by COVCs is an on-going source of TCE impacts to groundwater at the Site. TCE impacted groundwater is migrating southwest from the Site and being intercepted by the storm drain along the northern side of Kenwood Street. This is an unpermitted discharge. The storm drain appears to intercept the TCE plume and to mostly prevent its further migration to residential properties south of Kenwood Street. Laboratory results of groundwater at a depth of 40 feet in the western portion of the Site indicate that the TCE may be migrating vertically downward. There is only one deep well near this portion of the Site so the extent of TCE at depth is not known, nor is its direction of migration if any. A map showing the extent of TCE in groundwater is presented as **Figure 5**. In **Figure 5**, results highlighted in yellow exceed published Method 1 standards for groundwater and the area highlighted in pink is the extent of TCE in groundwater.

A more detailed summary of response actions and results of recent sampling at the Site can be found in **Appendix B** along with information on the hydrogeologic characteristics of the Site and the extent of contamination as determined by data gathered to date.

4.0 ADDRESSING PUBLIC CONCERNS

The process for assessing and cleaning up disposal sites as set forth in the MCP (310 CMR 40.0000), is designed to address the effects on health, safety, public welfare, and the environment related to potential exposure to detected compounds in soil, and groundwater. When a release of oil or hazardous materials has been confirmed at a release site (Phase I of the remedial response action process), the process proceeds to:

- Comprehensive field investigation to determine the nature and extent of the contamination and an evaluation of any risks posed to the public and the environment from the Site (Phase II). OTO completed a Phase II Report in 2020 and MassDEP requested an expanded Phase II Scope of Work which was conditionally approved by MassDEP in a letter dated October 20, 2023. Part of the expanded scope of work was quarterly sampling and OTO has completed two rounds thus far in 2024. Results of the quarterly sampling are discussed in **Appendix B** and presented in **Tables 1-3**, and **Figure 5**.

- Identification and evaluation of remedial response action alternatives and selection of feasible measures that will achieve a permanent cleanup at the Site (Phase III).

Physical work at a release site may include sampling and other environmental field testing, and the implementation of the selected response actions. It may also include the implementation of measures designed to stabilize conditions at the site.

At each step of the response action process, plans for work are developed, the work is conducted, and reports describing results and recommendations for the next step are prepared. The documents that describe each of these steps are the cornerstone of the response action planning process, since they provide the information necessary to make decisions about how a site should be cleaned up. These items are summarized in milestone documents. Each milestone document will be available in draft for a 20-day public comment period. Notice of availability of each document and the comment period will be sent to each party on the mailing list and a notice will be placed in the *Greenfield Recorder*.

During the public meeting for the DRAFT PIP, OHI will solicit comments and questions. Answers will be provided during the meeting when possible by OHI and OTO. Questions/comments requiring written responses are required in written format (email/letter) and will be accepted during the comment period, 20 (twenty) days following the public meeting. Written comments are encouraged. Responses to the questions will be included in the PIP Appendices. A copy of the final PIP will be placed in the information repository and the MassDEP RTN 1-18869 Release Site on-line file. A notice of availability of the final PIP will be sent to the PIP mailing list, 401 Liberty/OTO, and to all those who submitted comments.

5.0 PUBLIC INVOLVEMENT ACTIVITIES

In accordance with the MCP (310 CMR 40.0000), activities undertaken to involve the public in response actions serve two purposes:

- for all disposal sites, Public Involvement Activities shall be used to inform the public about the risks posed by the disposal site conditions and provide the status of remedial response actions, the availability of Technical Assistance Grants, and the opportunities for public involvement; and

- for Public Involvement Plan sites, Public Involvement Activities shall be used to solicit the concerns of the public about the disposal site and remedial response actions so that, to the extent possible, these concerns can be addressed and incorporated in planning remedial response actions.

To meet each of these objectives, the City of Greenfield proposes to undertake specific public involvement activities during the assessment and remedial response process for the former Lunt Site (RTN 1-18869). These activities are described below.

9.1 Informing the Public

City of Greenfield will provide site-specific information to the public on the RTN 1-18869 Release Site by:

- establishing an information repository;
- developing and maintaining a mailing list to distribute information about RTN 1-18869 Release Site;
- providing advance notification of the meeting, reports and other PIP process information to local officials, Petitioners, PIP mailing list and public notices in local media; and,
- holding public meetings as required.

Information Repositories

Massachusetts Department of Environmental Protection Site Files: A file on RTN 1-18869 Release Site is maintained at the Western Regional Massachusetts Department of Environmental Protection (MassDEP) Office. The file contains all documents pertaining to the Site with the exception of any enforcement-sensitive material. The majority of documents are available from MassDEP on-line using the RTN: https://eeaonline.eea.state.ma.us/portal#!/search/wastesite

Appointments to view the Site files at MassDEP offices can be made by contacting:

Massachusetts Department of Environmental Protection
Western Region Office
436 Dwight Street
Springfield, MA 01103
Telephone: 413-784-1100

Local Information Repository: City of Greenfield has established and will maintain a local information repository to provide residents with easy access to information about RTN 1-18869 Release Site cleanup process. The information repository will contain a copy of the Release Site file (documents submitted to MassDEP) moving forward including: work plans; sampling and field testing plans; technical reports and documents summarizing results and recommendations; public information materials; the Public Involvement Plan; public meeting summaries; summaries of responses to comments received; and copies of public notices about the Site. Information will be sent to the repository by City of Greenfield as it is developed. Historic documents and information submitted to MassDEP are available on the eDEP web server and can be viewed at: https://eeaonline.eea.state.ma.us/portal#!/search/wastesite and searching for the Site using the RTN #1-18869.

The information repository for the RTN 1-18869 Release Site is located at:

Greenfield Public Library
412 Main Street
Greenfield, MA 01301
Contact the Librarian: (413) 772-1544
Hours of operation:
Mon-Wed 9:30am-8pm
Thu-Fri 9:30am-5pm
Sat 9:30am-2pm

9.1.2 Site Mailing List

City of Greenfield established a mailing list for RTN 1-18869 Release Site. The mailing list will be used to announce upcoming public meetings, distribute fact sheets, notices of public comment periods on and the availability of documents in the information repositories, and any other information about the RTN 1-18869 Release Site. The mailing list includes Petitioners, persons or officials from the community requesting in writing to be on the mailing list, the City of Greenfield Mayor, the Director of the Greenfield Health Department, 401 Liberty/OTO, and the Massachusetts Department of Environmental Protection (these will be submitted electronically).

With the exception of the City Offices and MassDEP, the mailing list is developed based on parties that request to be included on the list. Parties providing contact information at the public meeting or in a written request will be included on the mailing list. OHI Engineering will maintain the list and update it as necessary. Parties can also be removed from the mailing list by written request. The initial mailing list will be the one developed by the Lunt Neighborhood Action Group (LNAG). The mailing list is included as **Appendix H**.

City of Greenfield/OHI will provide DEP with a copy of the mailing list. Anyone wishing to be added to or removed from the mailing list can call or write to:

Name:	OHI Engineering, Inc.
Address:	110 Pulpit Hill Road
	Amherst, Massachusetts 01002
Contact person:	Lyons Witten
Telephone:	(413) 835-0780
Email:	lwitten@ohiengineering.com
Relationship to Site:	Consultant to City of Greenfield

9.1.3 Public Notification of Major Milestones and Events

The Massachusetts Contingency Plan requires community notification of major planning and implementation milestones at disposal sites. Major milestones may include:

1) the start of fieldwork involving:
    - the implementation of any Immediate Response Actions for imminent hazards;
    - the implementation of any Release Abatement Measures;
    - the use of respirators or level A,B, or C protective clothing;
    - residential sampling;
    - Phase IV remedial actions; and

2) the completion of each phase of the remediation process, including:
    - Immediate Response Action Completion Statements for imminent hazards;
    - Response Action Outcome;
    - Activity and Use Limitations; and
    - Downgradient Property Status Opinions.

Notification of fieldwork will include information on the type of work and its approximate duration. **Notification will be made by the party conducting the work** (e.g. OHI on behalf of the City or OTO on behalf of 401 Liberty) to the people on the mailing list by mail or email before activity is scheduled to begin. Notification at the end of a remedial phase will include a summary of the phase report and information on when the report can be reviewed at the repositories. Assessment fieldwork is not included in the notification requirement.

Notifications of milestones and other events will be made to individuals on the RTN 1-18869 Site mailing list and will be advertised in the *Greenfield Recorder*. In addition, the Greenfield Fire and Police Departments will be notified in situations where public safety is a concern.

A list of milestones normally part of a PIP process are outlined below. Any new reportable releases under the MCP that occur on the Property will become part of this PIP, and the public will be notified as described herein.

- Phase II Comprehensive Site Assessment Scope of Work prior to Phase II (was conditionally approved by MassDEP in a letter dated October 20, 2023)
- Phase II Comprehensive Site Assessment and Phase III Remedial Action Plan (RAP) February 2025
- Release Abatement Measure (RAM) Plan (as needed)
- Phase IV Remedial Implementation Plan (RIP) February 2026
- Phase IV Final Inspection Report (FIR) Completion Statement and Remedy Operating Status (ROS) Opinion February 2028
- Response Action Outcome (RAO) (To be determined)

The proposed dates are MCP deadlines. Drafts of these reports for public comment will be available at least 20 days (or more) in advance of these deadlines.

9.2 Soliciting Public Input

Based on input from Petitioners, City of Greenfield will provide opportunities for public commentary regarding RTN 1-18869 Release Site cleanup decisions during public comment periods.

9.2.1 Public Meeting

A public meeting to discuss this DRAFT PIP was held on December 10, 2024 via Zoom. The mailing list was notified of the meeting.

The Public meeting will serve two purposes:

1) to provide petitioners, community officials and the general public with a progress report regarding remedial response actions at the Site, and
2) to provide an opportunity for the public to question and comment on Response Actions for the Site.

LNAG sent notices announcing the public meeting to individuals on the mailing list and the City of Greenfield published announcements in the *Greenfield Record* 14 days (November X, 2024) in advance of the public meeting. A sign in sheet was taken at the public meeting to update the mailing list. A copy of the sign in sheet is included at the end of **Appendix F**. Questions received in writing and responses to questions are included in **Appendix G**.

9.2.2 Public Comment Periods

City of Greenfield will provide specific opportunities for the public to submit comments about documents concerning RTN 1-18869 Release Site. When milestone documents are available in draft form, they will be provided to the information repositories, and a notice of their availability will be sent to the PIP mailing list. The notice will include the title of the document, where it is available for review, information about how to submit comments to Norfolk Asphalt, and the length of the public comment period. As required by the regulation, the comment period will be 20 calendar days. In the extreme event that City of Greenfield deems an extension of the comment period is warranted, they may at their discretion extend the period.

In the unlikely event that time-critical remedial actions are necessary, they may be conducted prior to the close of the comment period if delaying the remedial actions would exacerbate release or site conditions or endanger health, safety, public welfare or the environment.

City of Greenfield/401 Liberty will be responsible for providing copies of documents they generate to the information repositories and to the MassDEP RTN 1-18869 Release Site file. City of Greenfield/OHI will send notices of availability of any documents prepared to the PIP mailing list.

Documents involving groundwater monitoring, well gauging results and potential future assessment activities will not be provided in draft format; however, the documents will be submitted to the Repository and notices of their availability will be sent to the PIP mailing list once they are incorporated into a milestone document. The notices will include the title of the document, and when it is available for review.

9.2.3 Response to Comments

City of Greenfield/OHI will prepare a summary of all written comments received on each milestone document available for public comment. The responses will be included as an Appendix to the final document once it is submitted to MassDEP. Responses to public comments will indicate which comments have been incorporated and explain why others have not been incorporated. These copies will be placed in the information repository and the RTN 1-18869 Release Site file. City of Greenfield/OHI will also send a notice of availability of the final report and response summary to the mailing list.

In accordance with the MCP (310 CMR 40.0000), activities undertaken to involve the public in response actions serve two purposes:

- for all disposal sites, Public Involvement Activities shall be used to inform the public about the risks posed by the disposal site conditions and provide the status of remedial response actions, the availability of Technical Assistance Grants, and the opportunities for public involvement; and

- for Public Involvement Plan sites, Public Involvement Activities shall be used to solicit the concerns of the public about the disposal site and remedial response actions so that, to the extent possible, these concerns can be addressed and incorporated in planning remedial response actions.

To meet each of these objectives, the City of Greenfield proposes to undertake specific public involvement activities during the assessment and remedial response process at the Site. These activities are described below.

5.1 Informing the Public

City of Greenfield will provide site-specific information to the public on the Former Lunt Silversmith Site by:

- establishing an information repository;
- developing and maintaining a mailing list to distribute information about RTN 1-18869 Release Site;
- providing advance notification of the meeting, reports and other PIP process information to local officials, Petitioners, PIP mailing list and public notices in local media; and,
- holding public meetings as required.

Information Repositories

Massachusetts Department of Environmental Protection Site Files: An electronic file on RTN 1-18869 Former Lunt Silversmith Site is maintained by the Massachusetts Department of Environmental Protection (MassDEP) via the Data Portal which can be accessed at this link: https://eeaonline.eea.state.ma.us/portal#!/search/wastesite.
The file contains all documents pertaining to the Site with the exception of any enforcement-sensitive material.

Local Information Repository: City of Greenfield has established and will maintain a local information repository to provide residents with easy access to information about RTN 1-18869 Release Site cleanup process. The information repository will contain a copy of the Release Site file (documents submitted to MassDEP) moving forward including: work plans; sampling and field testing plans; technical reports and documents summarizing results and recommendations; public information materials; the Public Involvement Plan; public meeting summaries; summaries of responses to comments received; and copies of public notices about the Site. Information will be sent to the repository by City of Greenfield as it is developed. Historic documents and information submitted to MassDEP are available on the eDEP web server and can be viewed at: https://eeaonline.eea.state.ma.us/portal#!/search/wastesite and searching for the Site using the RTN #1-18869.

The information repository for the RTN 1-18869 Former Lunt Silversmith Release Site is located at:

Greenfield Public Library

412 Main Street
Greenfield, MA 01301
Contact the Librarian: (413) 772-1544
Hours of operation:
Mon-Wed 9:30am-8pm
Thu-Fri 9:30am-5pm
Sat 9:30am-2pm

5.1.2 Site Mailing List

City of Greenfield will establish a mailing list for RTN 1-18869. The mailing list will be used to announce upcoming public meetings, distribute fact sheets, notices of public comment periods on and the availability of documents in the information repositories, and any other information about the Lunt Site. The mailing list includes Petitioners, persons or officials from the community requesting in writing to be on the mailing list, the Mayor of Greenfield, the Director of the Greenfield Health Department, 401 Liberty/OTO, and the Massachusetts Department of Environmental Protection (these will be submitted electronically).

With the exception of the Town Offices and MassDEP, the mailing list is developed based on parties that request to be included on the list. Parties providing contact information at the public meeting or in a written request will be included on the mailing list. Parties can also be removed from the mailing list by written request. The mailing list is included as **Appendix H**.

City of Greenfield/OHI will maintain the mailing list and update it as necessary. City of Greenfield will provide DEP with a copy of the mailing list. Anyone wishing to be added to or removed from the mailing list can call or write to:

Name:	OHI Engineering
Address:	110 Pulpit Hill Road
	Amherst, Massachusetts 01002
Contact person:	Lyons Witten, LSP
Telephone:	(413) 835-0780
Email:	lwitten@ohiengineering.com
Relationship to Site:	Agent

5.1.3 Public Notification of Major Milestones and Events

The Massachusetts Contingency Plan requires community notification of major planning and implementation milestones at disposal sites. Major milestones may include:

3) the start of fieldwork involving:
   - the implementation of any Immediate Response Actions for imminent hazards;
   - the implementation of any Release Abatement Measures;
   - the use of respirators or level A,B, or C protective clothing;
   - residential sampling;

- Phase IV remedial actions; and

4) the completion of each phase of the remediation process, including:
    - Immediate Response Action Completion Statements for imminent hazards;
    - Response Action Outcome;
    - Activity and Use Limitations; and
    - Downgradient Property Status Opinions.

Notification of fieldwork will include information on the type of work and its approximate duration. Notification will be made by the party conducting the work (e.g. OHI on behalf of City of Greenfield or OTO for 401 Liberty) to the people on the mailing list by mail or email before activity is scheduled to begin. Notification at the end of a remedial phase will include a summary of the phase report and information on when the report can be reviewed at the repositories. Assessment field work is not included in the notification requirement.

Notifications of milestones and other events will be made to individuals on the Lunt Site mailing list and will be advertised in the *Greenfield Record*. In addition, the Greenfield Fire and Police Departments will be notified in situations where public safety is a concern.

A list of milestones normally part of a PIP process are outlined below. Any new reportable releases under the MCP that occur on the Property will become part of this PIP, and the public will be notified as described herein.

- Phase II Comprehensive Site Assessment Scope of Work (conditionally approved by MassDEP October 20, 2023 and currently in progress)
- Phase II Comprehensive Site Assessment and Phase III Remedial Action Plan (RAP) March 2025
- Release Abatement Measure (RAM) Plan (as needed)
- Phase IV Remedial Implementation Plan (RIP) March 2026
- Phase IV Final Inspection Report (FIR) Completion Statement and Remedy Operating Status (ROS) Opinion January 2028
- Response Action Outcome (RAO) (To be determined)

The proposed dates are MCP deadlines. Drafts of these reports for public comment will be available at least 20 days (or more) in advance of these deadlines.

5.2 Soliciting Public Input

Based on input from Petitioners, City of Greenfield will provide opportunities for public commentary regarding the Former Lunt Silversmith Site cleanup decisions during public comment periods.

5.2.1 Public Meeting

A public meeting to discuss this DRAFT PIP will be held on December 10, 2024 via Zoom.

The Public meeting will serve two purposes:

3) to provide petitioners, community officials and the general public with a progress report regarding remedial response actions at the Site, and
4) to provide an opportunity for the public to question and comment on Response Actions for the Site.

City of Greenfield sent notices announcing the public meeting to individuals on the mailing list and published announcements in the *Greenfield Record* 14 days (November X, 2024) in advance of the public meeting. A sign in sheet was taken at the public meeting to update the mailing list. A copy of the sign in sheet is included at the end of **Appendix F**. Questions received in writing and responses to questions are included in **Appendix G**.

10.2.2 Public Comment Periods

City of Greenfield will provide specific opportunities for the public to submit comments about documents concerning the Lunt Site. When milestone documents are available in draft form, they will be provided to the information repositories, and a notice of their availability will be sent to the PIP mailing list. The notice will include the title of the document, where it is available for review, information about how to submit comments to City of Greenfield/OHI, and the length of the public comment period. As required by the regulation, the comment period will be 20 calendar days. In the extreme event that City of Greenfield deems an extension of the comment period is necessary, they may at their discretion extend the period.

In the unlikely event that time-critical remedial actions are necessary, they may be conducted prior to the close of the comment period if delaying the remedial actions would exacerbate release or site conditions or endanger health, safety, public welfare or the environment. The author of documents (e.g. City of Greenfield/OHI or 401 Liberty/OTO) will be responsible for providing copies of documents to the information repositories and to the MassDEP RTN 1-18869 eDEP Site file, as well as sending out notices of availability of any documents it prepares to the PIP mailing list.

Documents involving groundwater monitoring, well gauging results and potential future assessment activities will not be provided in draft format; however, the documents will be submitted to the Repository and notices of their availability will be sent to the PIP mailing list once they are incorporated into a milestone document. The notices will include the title of the document, and when it is available for review.

10.2.3 Response to Comments

City of Greenfield will prepare a summary of all written comments received on each milestone document available for public comment. The responses will be included as an Appendix to the final document once it is submitted to MassDEP. Responses to public comments will indicate which comments have been incorporated and explain why others have not been incorporated.

These copies will be placed in the information repository and the RTN 1-18869 eDEP Release Site file. City of Greenfield will also send a notice of availability of the final report and response summary to the mailing list.

6.0 SCHEDULE FOR PUBLIC INVOLVEMENT ACTIVITIES

- Public Meeting: September 17, 2024 where this DRAFT PIP Plan was introduced.
- Legal Notice of Public Meeting (November X, 2024)
- Draft PIP Public Meeting to solicit comments: December 10, 2024
- Public Comment Period (20 days after meeting): through December 27, 2024
- Finalized PIP Published (30 days after public comment period closes): by January 27, 2025.
- Comment Periods for milestones listed in Section 10.1.3 (20 days after availability)
- Responses to Comments for milestones listed in Section 10.1.3 (within 60 days from close of comment period).
- City of Greenfield intends to hold PIP meetings several times per year to keep the public informed. When more information is available faster, the intervals will be shorter.

7.0 REFERENCES

OTO, April 2020. Phase II Comprehensive Site Assessment & RAM Completion Report, Former Lunt Silversmith, 298 Federal Street, Greenfield, MA.

OTO, February 2024. Notice of Environmental Sampling , Former Lunt Silversmiths, 298 Federal Street, Greenfield, MA. MassDEP RTN #1-18869.

OTO, April 2024. Notice of Environmental Sampling , Former Lunt Silversmiths, 298 Federal Street, Greenfield, MA. MassDEP RTN #1-18869.

OTO, July 2024. Notice of Environmental Sampling , Former Lunt Silversmiths, 298 Federal Street, Greenfield, MA. MassDEP RTN #1-18869.

TABLES

O'Reilly, Talbot & Okun
ENGINEERING ASSOCIATES

July 2, 2024
J2693-01-06

City of Greenfield
Eric Twarog, AICP, Planning Director
14 Court Square
Greenfield, Massachusetts 01301

Via email: eric.twarog@greenfield-ma.gov

Subject: Notice of Environmental Sampling
Revised Phase II Comprehensive Site Assessment
Former Lunt Silversmiths, 298 Federal St., Greenfield, MA
MassDEP Release Tracking Number (RTN) 1-18869

Dear Mr. Twarog:

O'Reilly, Talbot & Okun Associates, Inc. (OTO), on behalf of 401 Liberty Street, LLC, is providing you with the environmental sampling results recently collected at the 298 Federal Street property and within public rights-of-way pursuant to the Phase II Scope of Work (SOW) [1] conditionally approved by the Massachusetts Department of Environmental Protection (MassDEP) in correspondence[2] dated October 20, 2023. This notice also serves as a means of providing a data package for the Lunt Public Involvement Plan (PIP) group's review. Copies of this notice have been delivered to the Mayor's Office, Board of Health, Department of Public Works, and Lunt Neighborhood Action Group primary contact.

This notice and attachments are subject to the Limitations attached in Appendix A. The data and findings of this document are for the exclusive use of OTO and 401 Liberty Street, LLC. Reliance on the attached environmental sampling results for any use or by parties other than those specifically stated is prohibited without the express written consent of OTO. Such use is at the sole risk of the user.

The spring sampling events were performed:

Groundwater Sampling	May 23 and 24, 2024
Catch Basin Stormwater Sampling	May 31, 2024
Catch Basin Sediment Sampling	May 31, 2024

[1] "Clarification of Revised Phase II Scope of Work" by OTO, 10/3/2023, https://eeaonline.eea.state.ma.us/EEA/FileViewer/FileViewer.aspx?fileEncryptionId=ijbajaae
[2] "CONDITIONAL APPROVAL OF PHASE II SCOPE OF WORK – ADDENDUM INTERIM DEADLINE" by MassDEP, 10/20/2023, https://eeaonline.eea.state.ma.us/EEA/FileViewer/FileViewer.aspx?fileEncryptionId=ijehbefe

Groundwater samples were collected via low-flow sampling techniques. Sediment and stormwater samples were collected as grab samples at catch basins where sediment was present and flowing stormwater was observed.

MassDEP's regulations at 310 CMR 40.01403(10) require 401 Liberty Street, LLC. to provide certain information to owners of properties from which environmental samples were collected. In accordance with those requirements, attached please find a table summarizing the recent laboratory analytical results with prior groundwater, catch basin sediment/soil data, and stormwater data, site maps showing sampling locations, and MassDEP's Notice of Environmental Sampling transmittal form (BWSC-123).

Additional documentation associated with the samples, such as that listed at 310 CMR 40.0017(3), will be provided to the City within 30 days of receipt of a request for such documentation. Additional public involvement opportunities are available under 310 CMR 40.1403(9) and 310 CMR 40.1404. Electronic copies of this correspondence are provided to the addressee and to the persons or entities identified in the electronic carbon copy list below. Hard copies of this correspondence will be provided to these persons or entities upon written request.

MassDEP has requested that these Notices of Environmental Sampling be uploaded to the eDEP electronic data portal instead of being transmitted via electronic mail. As the Municipality with Exempt Status with signing authority for the Disposal Site, the City of Greenfield is the entity who is able to upload and submit these documents on a Bureau of Waste Site Cleanup (BWSC) 126 Form through eDEP (https://edep.dep.mass.gov/).

As noted in our correspondence of January 23, 2024, OTO intends to collect quarterly samples in accordance with the MassDEP-approved scope of work. The next sampling events are expected to occur in July/August and October/November 2024.

Should you have any questions regarding this correspondence, please direct them to Raipher Pellegrino, Manager of 401 Liberty Street, LLC, at rdp@raipher.com.

Sincerely,
O'Reilly, Talbot & Okun Associates, Inc.

Lori A. McCarthy, LSP
Principal

Attachments:

TABLES

Table 1	Groundwater Analytical Results
Table 2	Catch Basin Sediment/Soil Analytical Results
Table 3	Catch Basin Stormwater Analytical Results

FIGURES

Figure 1	Site Locus
Figure 2	Site Map
Figure 3	Catch Basin & Outfall Locations

APPENDICES

Appendix A	Limitations
Appendix B	BWSC-123

Hard Copy and Email to:

- Raipher D. Pellegrino, 401 Liberty Street, LLC., 265 State Street, Springfield, MA 01103 rdp@raipher.com
- City of Greenfield, Mayor's Office, 14 Court Square, Greenfield, MA 01301 mayor@greenfield-ma.gov
- City of Greenfield, Board of Health, 20 Sanderson Street, Greenfield, MA 01301 greenfield_boh@greenfield-ma.gov
- City of Greenfield, Department of Public Works, 189 Wells Street, Greenfield, MA 01301 dpw@greenfield-ma.gov
- Lunt Neighborhood Action Group, Attn: Mr. Glen Ayers, 254 Davis Street, Greenfield, MA 01301 glenayers@gmail.com

O:\J2600\2693 401 Liberty LLC - Lunt\01-06 Former Lunt Silversmith Greenfield MA - Revised Phase II 2024-2025\Notices of Env Sampling\Notice of Environmental Sampling Results - May 2024\OTO_Notice of Environmental Sampling Results Letter July 2024.docx

TABLES

TABLE 1
GROUNDWATERA ANALTYICAL RESULTS
Chlorinated Volatile Organic Compounds (CVOCs)
Concentrations and Standards reported in micrograms per liter (µg/L)
298 Federal Street, Kenwood Street, and Forest Avenue
Greenfield, Massachusetts
MassDEP Release Tracking Number (RTN) 1-18869

Well ID.:	Applicable Groundwater Category	Sample Date:	cis-1,2- Dichloroethylene	Tetrachloroethylene (PCE)	trans-1,2- Dichloroethylene	Trichloroethylene (TCE)	Vinyl chloride
		Method 1 GW-2 Standard	20	20	90	5	2
		Method 1 GW-3 Standard	50,000	30,000	50,000	5,000	50,000
MW-A	GW-3	1/31/2024	< 1.0	20	< 1.0	61	< 1.0
		5/24/2024	1.9	16	2.3	77	< 1.0
MW-AD	GW-3	1/31/2024	< 25	90	< 80	**10,000**	< 25
		5/24/2024	< 20	26	< 20	3,100	< 5.0
MW-B	GW-2/3	1/31/2024	**37**	< 5.0	< 5.0	**630**	< 2.0
		5/24/2024	**26**	5.4	1.3	**270**	< 1.0
MW-C	GW-2/3	1/31/2024	< 20	**300**	< 20	**2,100**	< 5.0
		5/24/2024	11	**240**	< 10	**1,500**	< 2.5
MW-D	GW-3	1/31/2024	4.1	< 1.0	< 1.0	25	< 1.0
		5/24/2024	33	< 2.0	< 2.0	53	< 2.0
MW-E	GW-2/3	1/31/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/24/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
MW-F	GW-2/3	1/31/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/24/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
MW-G	GW-3	2/2/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/23/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
MW-I	GW-3	2/1/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/23/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
MW-ID	GW-3	2/1/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/23/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
MW-3	GW-3	3/13/2013	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
MW-5	GW-2/3	3/13/2013	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
MW-6	GW-2/3	1/19/2012	**23**	< 1.0	2	**8.8**	1.4
		2/28/2012	**186**	19	6.7	**232**	**47**
		3/13/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
MW-6R	GW-2/3	1/31/2024	< 1.0	< 1.0	< 1.0	1.7	< 1.0
		5/24/2024	4.9	< 1.0	2.2	3.1	< 1.0
MW-9	GW-2/3	3/13/2013	< 1.0	8.9	< 1.0	1.3	<2.0
LS-10	GW-2	1/19/2012	<10	<10	<10	<10	<10
LS-10R	GW-3	1/31/2024	< 1.0	1.7	< 1.0	24	< 1.0
		5/24/2024	< 1.0	1.4	< 1.0	14	< 1.0

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Greenfield, Massachusetts
MassDEP Release Tracking Number (RTN) 1-18869

Well ID.:	Applicable Groundwater Category	Sample Date:	cis-1,2- Dichloroethylene	Tetrachloroethylene (PCE)	trans-1,2- Dichloroethylene	Trichloroethylene (TCE)	Vinyl chloride
		Method 1 GW-2 Standard	20	20	90	5	2
		Method 1 GW-3 Standard	50,000	30,000	50,000	5,000	50,000
LS-19	GW-3	1/19/2012	6,340	6,400	<20,000	**107,000**	<20,000
		3/13/2013	76	210	<100	3,400	<100
		10/24/2019	1,200	400	13	2,700	<20
		2/1/2024	8,600	1,800	97	**41,000**	< 50
		5/23/2024	8,400	1,500	110	**34,000**	< 40
LS-20	GW-2/3	1/19/2012	**24**	<5	<5	**199**	<5.0
		8/9/2018	**23**	< 1.0	1.9	**180**	<2.0
LS-21	GW-3	2/28/2012	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		3/13/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
LS-21R	GW-3	2/1/2024	15	< 1.0	< 1.0	4.8	< 1.0
		5/23/2024	6.7	< 1.0	< 1.0	2.5	< 1.0
LS-22	GW-3	2/28/2012	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		3/13/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
		9/26/2019	< 1.0	< 1.0	< 1.0	5.4	<2.0
		2/2/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/24/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
LS-23	GW-2/3	2/28/2012	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		3/13/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
		9/26/2019	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
		2/2/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/24/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
LS-24	GW-2/3	2/28/2012	18	**1,630**	1	**17,200**	< 1.0
		3/13/2013	<250	2,300	<250	**18,000**	<500
MW-101	GW-2/3	3/12/2013	**45**	<20	<20	**1,000**	<40
		9/26/2019	**68**	<10	<10	**1,000**	<20
		12/26/2019	**130**	<50	<50	**3,400**	<100
		1/31/2024	**140**	< 10	15	**3,300**	< 2.5
		5/24/2024	**180**	< 20	21	**4,400**	< 5.0
MW-102	GW-3	3/12//13	3.5	<1.0	<1.0	4.5	3.4
		8/9/2018	4.2	<1.0	<1.0	15	<2.0
MW-102R	GW-3	1/31/2024	3.8	< 1.0	< 1.0	14	2.5
		5/24/2024	5.2	< 1.0	< 1.0	4.2	< 1.0
MW-103	GW-3	3/12/2013	280	<4.0	<4.0	27	<8.0
		9/26/2019	460	<4.0	160	<4.0	<8.0
		12/26/2019	56	<1.0	20	<1.0	<2
		1/31/2024	9.5	< 1.0	3.9	< 1.0	< 1.0
		5/23/2024	1.4	< 1.0	< 1.0	< 1.0	< 1.0

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MassDEP Release Tracking Number (RTN) 1-18869

Well ID.:	Applicable Groundwater Category	Sample Date:	cis-1,2- Dichloroethylene	Tetrachloroethylene (PCE)	trans-1,2- Dichloroethylene	Trichloroethylene (TCE)	Vinyl chloride
	Method 1 GW-2 Standard		20	20	90	5	2
	Method 1 GW-3 Standard		50,000	30,000	50,000	5,000	50,000
MW-104	GW-3	3/12/2013	<200	<200	<200	**19,000**	<400
		8/9/2018	180	15	4.6	890	9.8
		9/26/2019	5,500	<400	<400	**45,000**	<800
		1/31/2024	13	< 1.0	< 1.0	94	< 1.0
		5/24/2024	2,800	100	130	**33,000**	54
MW-105	GW-3	3/12/13	8.3	< 1.0	< 1.0	59	<2.0
MW-105R	GW-3	1/31/2024	4.1	< 1.0	< 1.0	34	< 1.0
		5/23/2024	5.2	< 1.0	1.2	25	< 1.0
MW-106	GW-3	3/12/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
		9/26/2019	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
		12/26/2019	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
		2/1/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/23/2024	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
MW-107	GW-3	3/12/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
MW-107R	GW-3	2/1/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/23/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
MW-108	GW-3	3/12/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
MW-109	GW-3	3/12/2013	< 1.0	< 1.0	< 1.0	1.8	<2.0
		2/1/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/23/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
MW-110	GW-3	3/12/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
MW-111	GW-3	3/12/2013	8.1	< 1.0	1.4	43	<2.0
		9/27/2019	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
		12/26/2019	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
MW-112	GW-3	3/12/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
MW-113	GW-2/3	3/12/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
MW-114	GW-2/3	3/12/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
MW-115	GW-3	3/12/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
MW-116	GW-3	3/12/2013	< 1.0	< 1.0	< 1.0	< 1.0	<2.0
		2/2/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
		5/23/2024	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0

TABLE 1
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298 Federal Street, Kenwood Street, and Forest Avenue
Greenfield, Massachusetts
MassDEP Release Tracking Number (RTN) 1-18869

Well ID.:	Applicable Groundwater Category	Sample Date:	cis-1,2- Dichloroethylene	Tetrachloroethylene (PCE)	trans-1,2- Dichloroethylene	Trichloroethylene (TCE)	Vinyl chloride
		Method 1 GW-2 Standard	20	20	90	5	2
		Method 1 GW-3 Standard	50,000	30,000	50,000	5,000	50,000
LWP-100	GW-2/3	8/18/2016	1.7	<1.0	<1.0	<1.0	<2.0
		9/15/2016	3.7	<1.0	<1.0	2.2	<2.0
LWP-101	GW-2/3	9/15/2016	<1,000	**3,200**	<1,000	**250,000**	<2,000
LWP-102	GW-2/3	9/15/2016	5.6	2	14	**28**	<2.0
LWP-103	GW-2/3	9/15/2016	**20**	1.5	48	**22**	<2.0
LWP-104	GW-2/3	9/15/2016	<1.0	<1.0	<1.0	**18**	<2.0
LWP-105	GW-2/3	9/15/2016	**31**	7.6	1.4	**510**	<2.0
LWP-106	GW-2/3	9/15/2016	16	<1.0	<1.0	**24**	<2.0
LWP-107	GW-2/3	9/15/2016	5.8	12	1.7	**2,200**	<2.0
LWP-108	GW-2/3	9/15/2016	2.4	<1.0	<1.0	**15**	<2.0
Sump-1	GW-2/3	9/15/2016	<1.0	<1.0	<1.0	2.6	<2.0

NOTES:
1. Concentrations in micrograms per liter (ug/L, or parts per billion).
2. "<" indicates not detected; value is laboratory method reporting limit.
3. MCP Method 1 groundwater standards from 310 CMR 40.0974(2). Effective March 1, 2024. Applicable in areas where the groundwater is considered to be in one or more category per 310 CMR 40.0932.
Groundwater shall be defined to be in category GW-2 if it is located within 30 feet of an existing or planned building or structure that is or will be occupied, and the average annual depth to groundwater in that area is 15 feet or less.
Groundwater at all disposal sites shall be considered a potential source of discharge to surface water and shall be categorized, at a minimum, as category GW-3.
4. Values shown in **bold** are greater than the applicable MCP Method 1 GW-2 or GW-3 Standard.
5. Only analytes frequently detected in at least one sample location are shown; refer to laboratory reports for full analyte listing.

TABLE 2
CATCH BASIN SEDIMENT*/SOIL ANALYTICAL RESULTS
Chlorinated Volatile Organic Compounds (CVOCs)
Concentrations and Standards in mg/Kg
298 Federal St., Kenwood St., Davis St., Chapman St., and Colrain St.
Greenfield, Massachusetts
MassDEP Release Tracking Number (RTN) 1-18869

			cis-1,2-Dichloroethylene	Tetrachloroethylene (PCE)	trans-1,2-Dichloroethylene	Trichloroethylene (TCE)	Vinyl Chloride
MCP Reportable Concentrations & Method 1 Soil Standards (Not applicable, for comparison only)		**RCS-1**	0.1	1	1	0.3	0.7
		S-3/GW-2	0.1	1	4	0.3	0.7
		S-3/GW-3	500	3,000	800	70	100
Sample Location/ID:	**Applicable Soil Category:**	**Sample Date:**					
CB-1N	S-3/GW-2	2/5/2024	0.063	< 0.0031	< 0.0031	0.24	< 0.0031
		5/31/2024	0.062	< 0.0056	< 0.0056	0.0059	0.013
CB-1S	S-3/GW-2	2/5/2024	< 0.0035	< 0.0035	< 0.0035	**0.35**	< 0.0035
		5/31/2024	< 0.0085	< 0.0085	< 0.0085	< 0.0085	< 0.0085
CB-2N	S-3/GW-3	2/5/2024	0.86	0.0039	0.013	0.6	0.094
		5/31/2024	0.48	0.012	< 0.0069	0.43	< 0.0069
CB-2S	S-3/GW-3	2/5/2024	< 0.003	< 0.003	< 0.003	< 0.003	< 0.003
		5/31/2024	0.035	< 0.0092	< 0.0092	< 0.0092	< 0.0092
CB-3N	S-3/GW-3	2/5/2024	0.57	< 0.0054	0.0049	0.69	< 0.0054
		5/31/2024	0.45	< 0.0059	< 0.0059	< 0.0059	< 0.0059
CB-3S	S-3/GW-2	2/5/2024	< 0.0041	< 0.0041	< 0.0041	< 0.0041	< 0.0041
		5/31/2024	< 0.006	< 0.006	< 0.006	< 0.006	< 0.006
CB-5N	S-3/GW-3	2/5/2024	0.0073	0.004	< 0.0027	0.68	< 0.0027
		5/31/2024	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011
CB-5S	S-3/GW-3	2/5/2024	< 0.0035	< 0.0035	< 0.0035	< 0.0035	< 0.0035
		5/31/2024	< 0.0037	< 0.0037	< 0.0037	< 0.0037	< 0.0037
CB-6S	S-3/GW-3	2/12/2024	< 0.0029	< 0.0029	< 0.0029	< 0.0029	< 0.0029
		5/31/2024	< 0.0058	< 0.0058	< 0.0058	< 0.0058	< 0.0058
CB-7	S-3/GW-3	2/12/2024	< 0.0024	< 0.0024	< 0.0024	0.0045	< 0.0024
		5/31/2024	0.01	< 0.0061	< 0.0061	0.036	< 0.0061

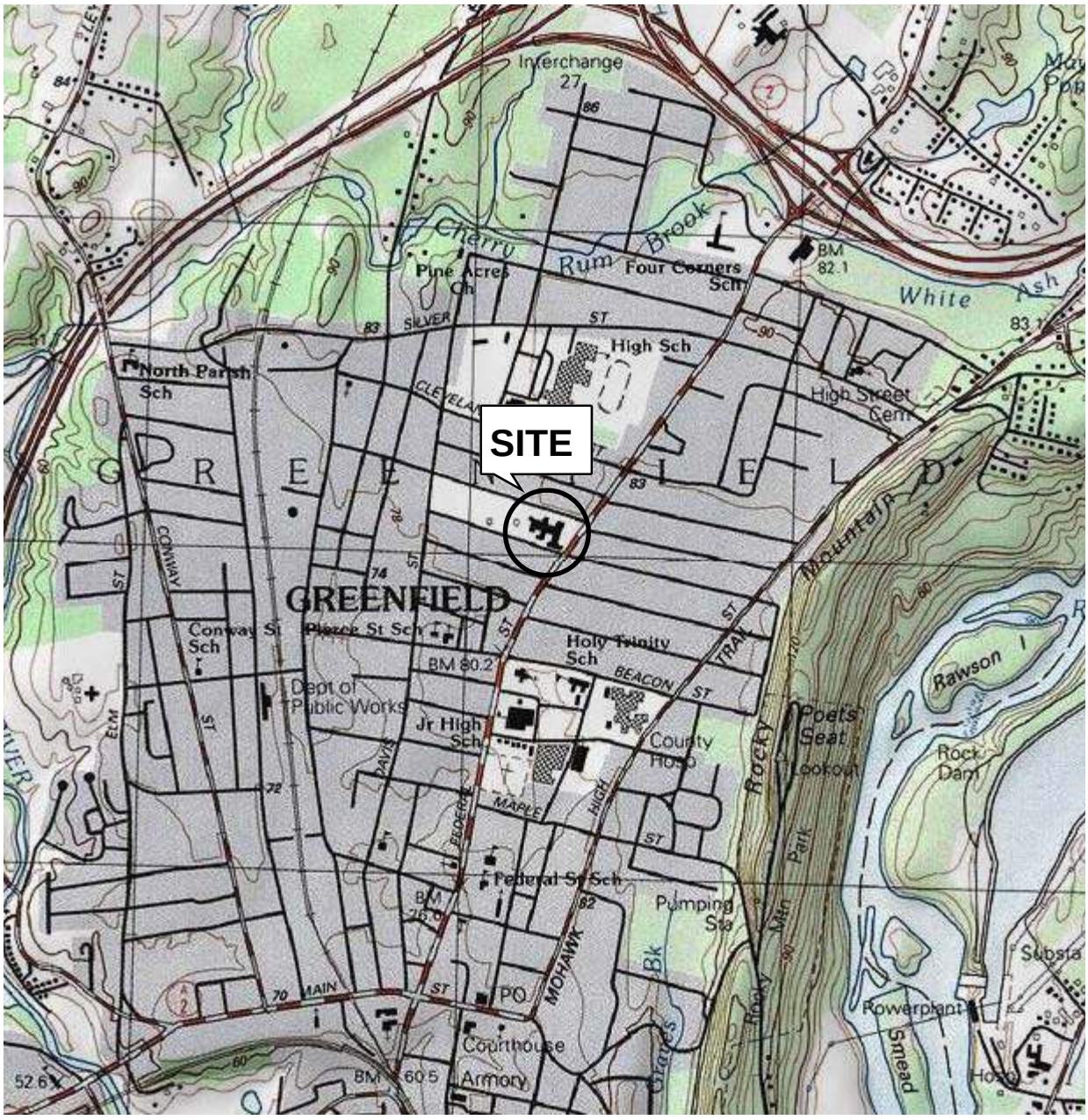
NOTES:
1. Concentrations in milligrams per kilogram (mg/Kg, or parts per million) on a dry weight basis.
2. "<" indicates not detected; value is sample-specific quantitation limit.
3. * Sediments means all detrital and inorganic or organic matter situated on the bottom of lakes, ponds, streams, rivers, the ocean, or other surface water bodies. Sediments are found:
   (a) in tidal waters below the mean high water line as defined in 310 CMR 10.23: Additional Definitions for 310 CMR 10.21 through 10.37; and
   (b) below the upper boundary of a bank, as defined in 310 CMR 10.54(2), which abuts and confines a water body.
4. Soil means any unconsolidated mineral and organic matter overlying bedrock that has been subjected to and influenced by geologic and other environmental factors, excluding sediment.
5. Per the definitions above, the above data are representative of soil, not sediment.
   The representative material is located within the confines of pipes and catch basins. As such it is potentially accessible by adults only, on an infrequent basis, and categorized as S-3.
6. "RCS-1" = Reportable concentration from 310 CMR 40.1600. Not applicable, for comparison only at the request of MassDEP.
7. MCP Method 1 soil standards from 310 CMR 40.0975(6). Effective March 1, 2024. For comparison only.
   Method 1 Soil Standards are not considered applicable or suitably analogus for a Method 3 Risk Characterization.
8. Values shown in **bold** are greater than the comparable MCP Method 1 Soil Standards.

TABLE 3
CATCH BASIN STORMWATER ANALYTICAL RESULTS
Chlorinated Volatile Organic Compounds (CVOCs)
Results and Standards reported in micrograms per Liter (µg/L)
298 Federal St., Kenwood St., Davis St., Chapman St., and Colrain St.
Greenfield, Massachusetts
MassDEP Release Tracking Number (RTN) 1-18869

		1,1,1-Trichloroethane	1,1-Dichloroethane	1,1-Dichloroethylene	cis-1,2-Dichloroethylene	trans-1,2-Dichloroethylene	Tetrachloroethylene (PCE)	Trichloroethylene (TCE)	Vinyl Chloride
Applicable Standards	Surface Water Benchmark	900	990	1,200	14,000	22,000	1,100	190	41,000
	(Fish & Shellfish Consumption Only)	200,000	650	20,000	NE	NE	29	7	1.6
Sample Location/ID:	**Sample Date:**								
CB-1N	3/15/12	<5	<5	<5	31	<5	<5	115	<5
	3/11/13	<1	<1	<1	9.5	1.3	<1	57	<2
	10/24/19	5.2	<2	<2	30	2.9	8.2	250	<4
	12/26/19	1.2	<1	<1	12	<1	<1	43	<2
	2/5/24	1	< 1.0	< 1.0	28	1.5	2.3	180	1.2
	5/31/24	< 1.0	< 1.0	< 1.0	29	2	2.2	160	1
CB-1S	3/11/13	<1	<1	<1	2.1	<1	<1	<1	<2
	9/27/19	5.0	1.8	1.0	56	2.3	<1	120	2.1
	10/24/19	12.0	3.1	3.1	120	4.4	7	390	4.2
	12/26/19	<2	<2	<2	10	<2	<2	6.3	<4
	2/5/24	< 250	< 250	< 250	< 250	< 250	< 250	< 250	< 250
	5/31/24	< 1.0	< 1.0	< 1.0	11	< 1.0	< 1.0	12	< 1.0
CB-2N	3/15/12	<10	<10	<10	158	<10	17	581	<10
	1/10/13	<20	<20	<20	240	<20	<20	700	<40
	3/11/13	<10	<10	<10	100	<10	12	470	<20
	12/26/19	<5	<5	<5	290	<5	11	430	<10
	2/5/24	< 1.0	< 1.0	1.9	310	4.2	42	1,100	4.5
	5/31/24	< 1.0	< 1.0	2.4	380	5.5	22	610	6.8
CB-2S	3/11/13	<1	<1	<1	2	<1	<1	12	<2
	9/27/19	<10	<10	<10	<10	<10	<10	<10	<20
	12/26/19	<1	<1	<1	<1	<1	<1	1.4	<2
	2/5/24	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
	5/31/24	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
CB-3N	2/5/24	< 1.0	< 1.0	1.5	270	4.2	25	670	3.5
	5/31/24	< 1.0	< 1.0	1.3	280	3.9	12	370	4
CB-3S	2/5/24	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
	5/31/24	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
CB-5N	1/10/13	<2	<2	<2	52	<2	6	170	<4
	3/11/13	<2	<2	<2	19	<2	3.6	110	<4
	2/5/24	< 1.0	< 1.0	< 1.0	79	1.3	7.2	190	< 1.0
	5/31/24	< 1.0	< 1.0	< 1.0	110	1.7	4.3	140	1.3
CB-5S	3/11/13	<1	<1	<1	1.2	<1	<1	4.5	<2
	9/27/19	<2	<2	<2	<2	<2	<2	3.2	<4
	2/5/24	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
	5/31/24	< 1.0	< 1.0	< 1.0	1	< 1.0	< 1.0	2.4	< 1.0
CB-9	1/10/13	<1	<1	<1	<1	<1	<1	3	<2
	9/27/19	<1	<1	<1	<1	<1	<1	1.1	<2
	12/26/19	<1	<1	<1	<1	<1	<1	<1	<2
	2/5/24	< 1.0	< 1.0	< 1.0	9.9	< 1.0	< 1.0	21	< 1.0
	5/31/24	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
CB-12	1/10/13	<1	<1	<1	<1	<1	<1	1.5	<2
	2/5/24	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
	5/31/24	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
OF-1	4/11/12	<1	<1	<1	<1	<1	<1	<1	<1
OF-2	4/11/12	<1	<1	<1	<1	<1	<1	<1	<1
CB-Outfall	2/5/24	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
	5/31/24	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0

NOTES:
1. Concentrations in micrograms per liter (ug/l, or parts per billion).
2. "<" indicates not detected; value is quantitation limit.
3. Surface Water Benchmarks are toxicity-based surface water concentrations used by MassDEP in developing GW-3 groundwater standards. These values are based on toxicity to aquatic life downstream of the outfall.
4. Human Health Criteria (Fish & Shellfish Consumption Only) from 314 CMR 4.06(6): Figures and Tables.
   Table 29: Generally Applicable Criteria, Table 29b: Human Health Criteria.
   Table 8: "Class B" applicable to stretch of the Green River and tributaries downstream of the outfall.
5. NE = not established

FIGURES



0 .5 1 MILES

1000 0 1000 2000 3000 4000 5000 FEET

1 .5 0 KILOMETERS 1

1000 0 METERS 1000

Topographic Map Quadrant: Greenfield, MA
Map Version: 1998
Current as of: 1990

O'Reilly, Talbot & Okun
[A S S O C I A T E S]
ENGINEERING

293 Bridge Street, Suite 500
Springfield, Massachusetts 01103

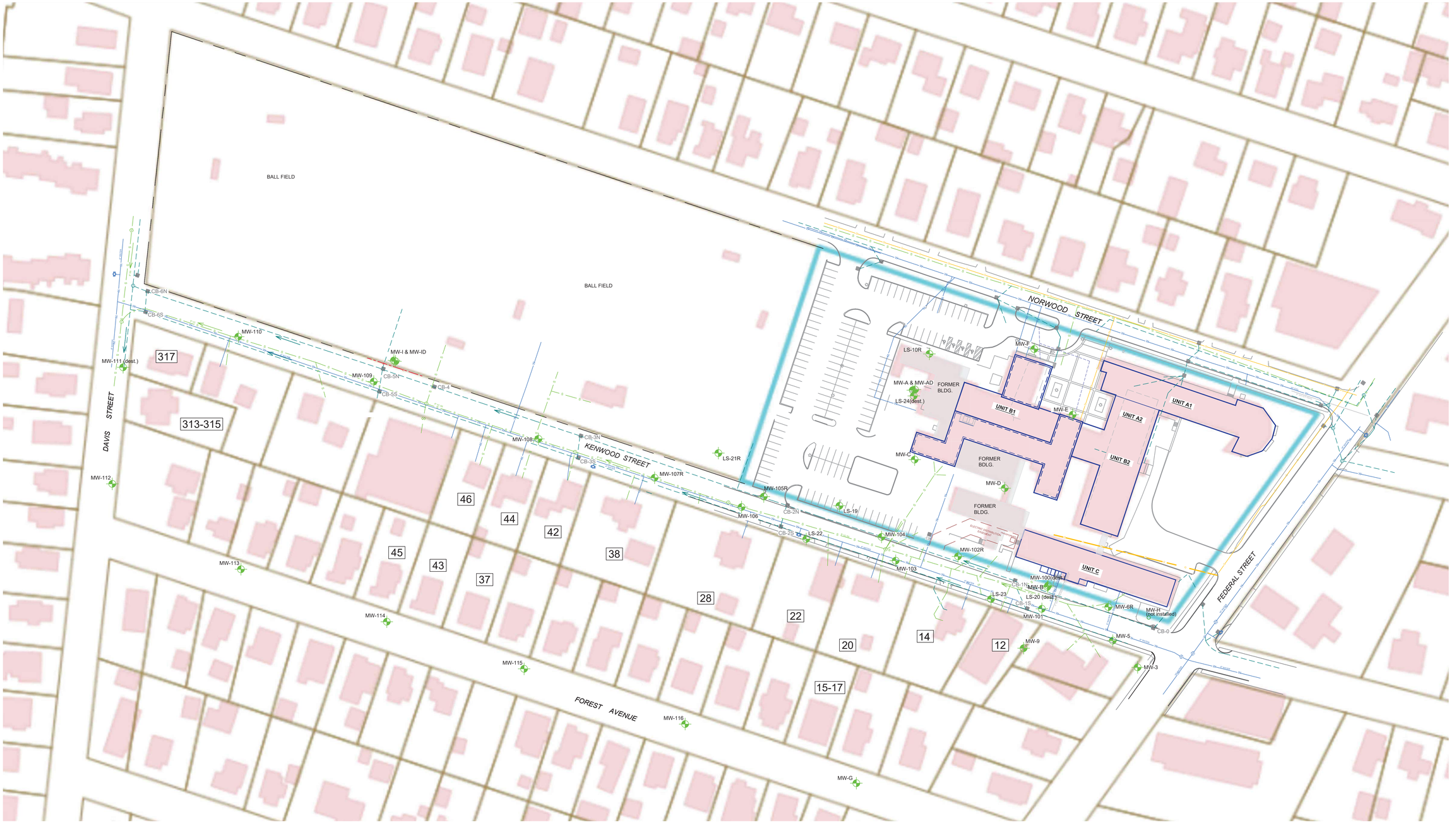
Phone: 413-788-6222
www.oto-env.com

Former Lunt Silversmiths
298 Federal Street
Greenfield, Massachusetts

SITE LOCUS

May 2016

Figure 1



NOTES:

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3. ALL DATA IS TO BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD(S) USED IN THE DEVELOPMENT OF THIS PLAN.
4. UTILITY LINES SHOWN HERE ARE A COMPOSITE OF DATA FROM VARIOUS DATES AND SOURCES AS PROVIDED TO OTO IN ELECTRONIC FORMAT. THE ACTUAL LOCATIONS OF CURRENT UTILITY LINES MAY VARY, AND THE DATA SHOWN HERE SHALL NOT BE CONSIDERED ACCURATE FOR THE PURPOSES OF SUB-GRADE EXPLORATIONS.
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LEGEND:

- APPROXIMATE PROPERTY BOUNDARY
- APPROXIMATE DRAIN UTILITY LINES AND FLOW DIRECTION
- APPROXIMATE WATER UTILITY LINES AND FLOW DIRECTION
- APPROXIMATE STORM SEWER UTILITY LINES AND FLOW DIRECTION
- APPROXIMATE GAS UTILITY LINES
- APPROXIMATE ELECTRIC UTILITY LINES
- APPROXIMATE FIRE UTILITY LINES

- CB-0 CATCH BASIN LOCATION WITH DESIGNATION
- HYDRANT
- W WATER UTILITY LINE MANHOLE
- S SEWER UTILITY LINE MANHOLE
- 12 RESIDENTIAL ADDRESS NUMBER
- MONITORING WELL LOCATION WITH DESIGNATION

SCALE
1" = 60'
0 30' 60' 120'

O'Reilly, Talbot & Okun
ENGINEERING ASSOCIATES
293 Bridge Street, Suite 500 Springfield, MA 01103 413.788.6222 www.OTO-ENV.com

MASSACHUSETTS CERTIFIED WBE

PROJECT TITLE:
298 FEDERAL STREET
GREENFIELD, MASSACHUSETTS

SCALE:	1" = 60'
PROJ. NO:	J2693-01-06
DRAWN:	04/01/2022 CDA (CAD)
CHECKED:	LAM
REV:	02/09/2024 MEO (ADOBE & BLUEBEAM)

DRAWING TITLE:
SITE MAP

FIGURE 2

O'Reilly, Talbot & Okun
ENGINEERING ASSOCIATES

293 Bridge Street, Suite 500 Springfield, MA 01103 413.788.6222
www.OTO-ENV.com

NOTES:

1. BASE MAP PROVIDED TO OTO IN ELECTRONIC FORMAT BY GREENFIELD DEPARTMENT OF PUBLIC WORKS.
2. CATCH BASIN AND SAMPLE LOCATIONS ARE SHOW ACCORDING TO TAPED MEASUREMENTS TAKEN FROM EXISTING SITE FEATURES.
3. ALL DATA IS TO BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD(S) USED IN THE DEVELOPMENT OF THIS PLAN.

PROJECT TITLE:
298 FEDERAL STREET

ADDRESS
GREENFIELD, MASSACHUSETTS

DRAWING TITLE:
CATCH BASIN & OUTFALL LOCATIONS

SCALE:	1" = 250'
PROJ. NO:	J2693-01-02
DRAWN:	CDA
CHECKED:	BHN
DATE:	02/06/2020
REV:	02/09/2024 MEO

FIGURE 3

APPENDIX A

LIMITATIONS

1. The observations presented in this report were made under the conditions described herein. The conclusions presented in this report were based solely upon the services described in the report and not on scientific tasks or procedures beyond the scope of the project or the time and budgetary constraints imposed by the client.

2. In preparing the report, O'Reilly, Talbot & Okun Associates, Inc. relied on certain information provided by state and local officials and other parties referenced herein, and on information contained in the files of state or local regulatory agencies. Although there may have been some degree of overlap in the information provided by these sources, O'Reilly, Talbot & Okun Associates, Inc. did not attempt to independently verify the accuracy or completeness of all information reviewed or received during the course of this assessment.

3. Unless otherwise specified in the Report, we did not perform testing or analyses to determine the presence or concentration of asbestos or polychlorinated biphenyls (PCBs) at the Site or in the environment at the Site.

4. This Report assesses the physical characteristics of the subject site with respect to the presence of oil or hazardous material (OHM) in soil or groundwater at the Site, and to assess risks associated with detected OHM, within the meaning of the Massachusetts Contingency Plan, 310 CMR 40.0000. No specific attempt was made to check on the compliance of present or past owners or operators of the Site with federal, state, or local laws and regulations, environmental or otherwise.

5. Risk assessment was performed in accordance with generally accepted practices of government agencies and other consultants conducting similar characterizations. The findings of the risk characterization are dependent on numerous assumptions and uncertainties inherent in the risk assessment process. Therefore, the findings of the risk assessment should not be interpreted as an absolute characterization of actual risks, but as general indicators highlighting potential sources of risk at the Site. Although the range of uncertainty in the risk characterization has not (and can not) be quantified, the use of conservative assumptions throughout the process would be expected to err on the side of protection of human health and the environment.

6. Where analytical data or information regarding site environmental conditions was unavailable or limited, we render no opinion as to risks due to oil and/or hazardous materials in those portions of the Site, or to oil and/or hazardous materials not tested.

7. Our report was prepared for the exclusive benefit of the client. The report and its conclusions are not extended to third parties or future property owners. We acknowledge copies of our report may be submitted to Massachusetts Department of Environmental Protection for Massachusetts Contingency Plan compliance purposes.

APPENDIX B

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC123

This Notice is Related to:
Release Tracking Number

1 - 18869

NOTICE OF ENVIRONMENTAL SAMPLING

As required by 310 CMR 40.1403(10) of the Massachusetts Contingency Plan

A. The address of the disposal site related to this Notice and Release Tracking Number (provided above):

1. Street Address: 298 Federal Street

City/Town: Greenfield Zip Code: 01301

B. This notice is being provided to the following party:

1. Name: City of Greenfield, Eric Twarog AICP, Planning Dir.

2. Street Address: 14 Court Square

City/Town: Greenfield Zip Code: 01301

C. This notice is being given to inform its recipient (the party listed in Section B):

☑ 1. That environmental sampling will be/has been conducted at property owned by the recipient of this notice.

☑ 2. Of the results of environmental sampling conducted at property owned by the recipient of this notice.

☑ 3. Check to indicate if the analytical results are attached. (If item 2. above is checked, the analytical results from the environmental sampling must be attached to this notice.)

D. Location of the property where the environmental sampling will be/has been conducted:

1. Street Address: 298 Federal St., Adjacent athletic field, and public rights of way

City/Town: Greenfield Zip Code: 01301

2. MCP phase of work during which the sampling will be/has been conducted:

☐ Immediate Response Action
☐ Release Abatement Measure
☐ Utility-related Abatement Measure
☐ Phase I Initial Site Investigation
☑ Phase II Comprehensive Site Assessment
☐ Phase III Feasibility Evaluation
☐ Phase IV Remedy Implementation Plan
☐ Phase V/Remedy Operation Status
☐ Post-Temporary Solution Operation, Maintenance and Monitoring
☐ Other _____ (specify)

3. Description of property where sampling will be/has been conducted:

☐ residential ☑ commercial ☐ industrial ☑ school/playground ☑ Other municipal (specify)

4. Description of the sampling locations and types (e.g., soil, groundwater, indoor air, soil gas) to the extent known at the time of this notice.

Groundwater samples collected 5/23-24/2024 at MW-A, MW-AD, MW-B, MW-C, MW-D, MW-E, MW-F, MW-G, MW-I, MW-ID, MW-6R, LS-10R, LS-19, LS-21R, LS-22, LS-23, MW-101, MW-102R, MW-103, MW-104, MW-105R, MW-106, MW-107R, MW-109, and MW-116, and sediment/soil and stormwater samples collected at catch basins located on Kenwood, Davis, and Chapman Streets.

E. Contact information related to the party providing this notice:

Contact Name: 401 Liberty Street, LLC, Attn: Raipher D. Pellegrino

Street Address: 265 State Street

City/Town: Springfield Zip Code: 01103

Telephone: _____ Email: rdp@raipher.com

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC123

This Notice is Related to:
Release Tracking Number

1 - 18869

NOTICE OF ENVIRONMENTAL SAMPLING

As required by 310 CMR 40.1403(10) of the Massachusetts Contingency Plan

MASSACHUSETTS REGULATIONS THAT REQUIRE THIS NOTICE

This notice is being provided pursuant to the Massachusetts Contingency Plan and the notification requirement at 310 CMR 40.1403(10). The Massachusetts Contingency Plan is a state regulation that specifies requirements for parties who are taking actions to address releases of chemicals (oil or hazardous material) to the environment.

THE PERSON(S) PROVIDING THIS NOTICE

This notice has been sent to you by the party who is addressing a release of oil or hazardous material to the environment at the location listed in **Section A** on the reverse side of this form. (The regulations refer to the area where the oil or hazardous material is present as the "disposal site".)

PURPOSE OF THIS NOTICE

When environmental samples are taken as part of an investigation of a release for which a notification to MassDEP has been made under the Massachusetts Contingency Plan (310 CMR 40.0300) on behalf of someone other than the owner of the property, the regulations require that the property owner (listed in **Section B** on the reverse side of this form) be given notice of the environmental sampling. The regulations also require that the property owner subsequently receive the analytical results following the analysis of the environmental samples.

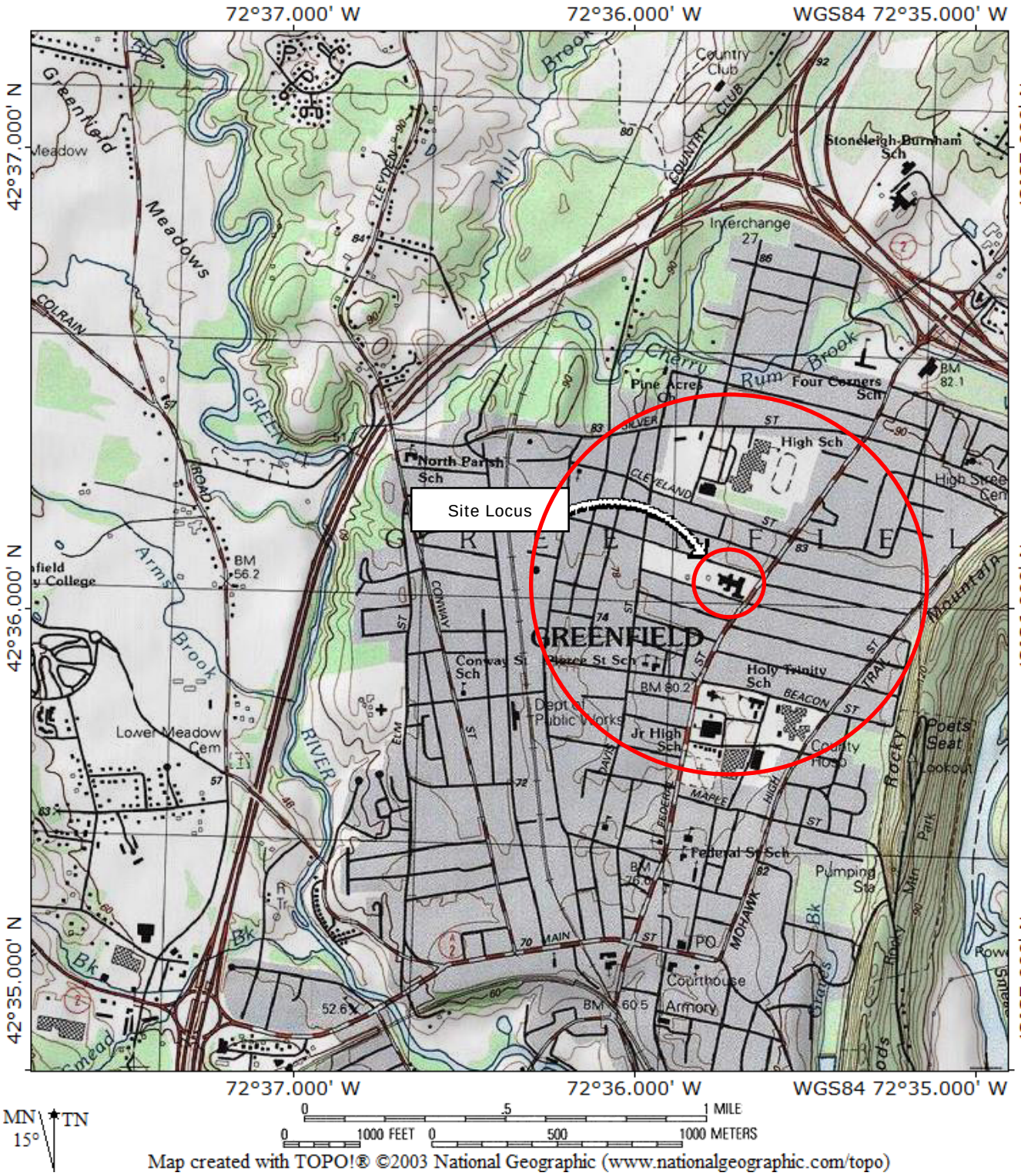
Section C on the reverse side of this form indicates the circumstance under which you are receiving this notice at this time. If you are receiving this notice to inform you of the analytical results following the analysis of the environmental samples, you should also have received, as an attachment, a copy of analytical results. These results should indicate the number and type(s) of samples (e.g., soil, groundwater) analyzed, any chemicals identified, and the measured concentrations of those chemicals.

Section D on the reverse side of this form identifies the property where the environmental sampling will be/has been conducted, provides a description of the sampling locations within the property, and indicates the phase of work under the Massachusetts Contingency Plan regulatory process during which the samples will be/were collected.

FOR MORE INFORMATION

Information about the general process for addressing releases of oil or hazardous material under the Massachusetts Contingency Plan and related public involvement opportunities may be found at http://www.mass.gov/eea/agencies/massdep/cleanup. For more information regarding this notice, you may contact the party listed in **Section E** on the reverse side of this form. Information about the disposal site identified in Section A is also available in files at the Massachusetts Department of Environmental Protection. See http://public.dep.state.ma.us/SearchableSites2/Search.aspx to view site-specific files on-line or http://mass.gov/eea/agencies/massdep/about/contacts/conduct-a-file-review.html if you would like to make an appointment to see these files in person. Please reference the **Release Tracking Number** listed in the upper right hand corner on the reverse side of this form when making file review appointments.

FIGURES



Map created with TOPO!® ©2003 National Geographic (www.nationalgeographic.com/topo)

Latitude 42o 36' 3.43" N
Longitude 72o 35' 44.26" E

Data Source: National Geographic

OHI Job # 23-2322

Former Lunt Silversmith
298 Federal Street
Greenfield, MA 01301

Rev. Date: September 10, 2024

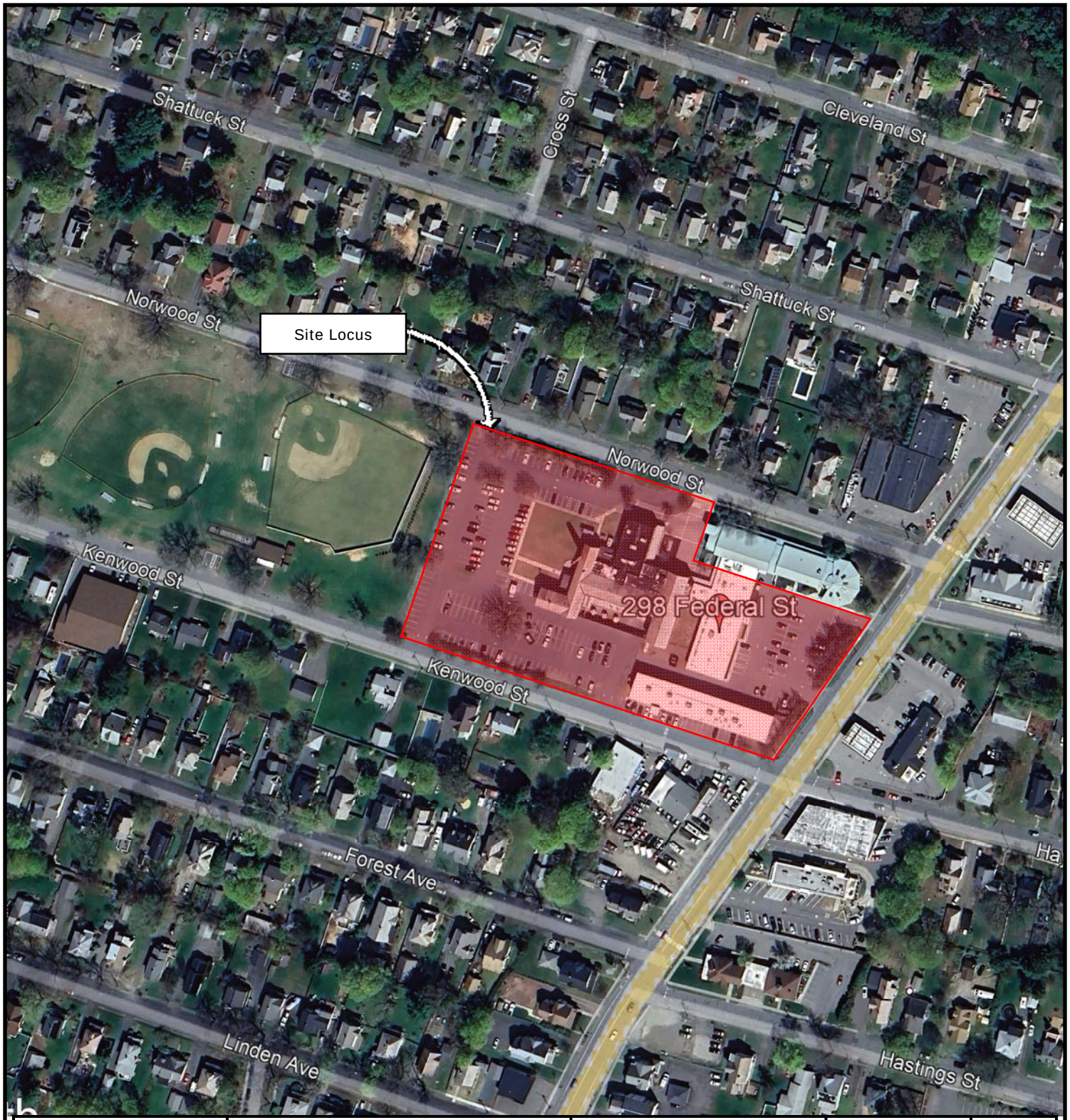
Figure 1
Locus Map

OHI Engineering, Inc.
Engineers and Environmental Scientists

44 Wood Ave
Mansfield, MA
Phone (508) 339-3929
Fax (508) 339-3140

110 Pulpit Hill Rd
Amherst, MA
Phone (413) 835-0780
Fax (413) 549-7918

www.ohiengineering.com



200 100 0 200

1" = 200'

Latitude 42o 36' 3.43" N
Longitude 72o 35' 44.26" E

Data Source: Google Maps

N

Former Lunt Silversmith
298 Federal Street
Greenfield, MA 01301

OHI Job # 23-2322

Figure 2
Orthographic

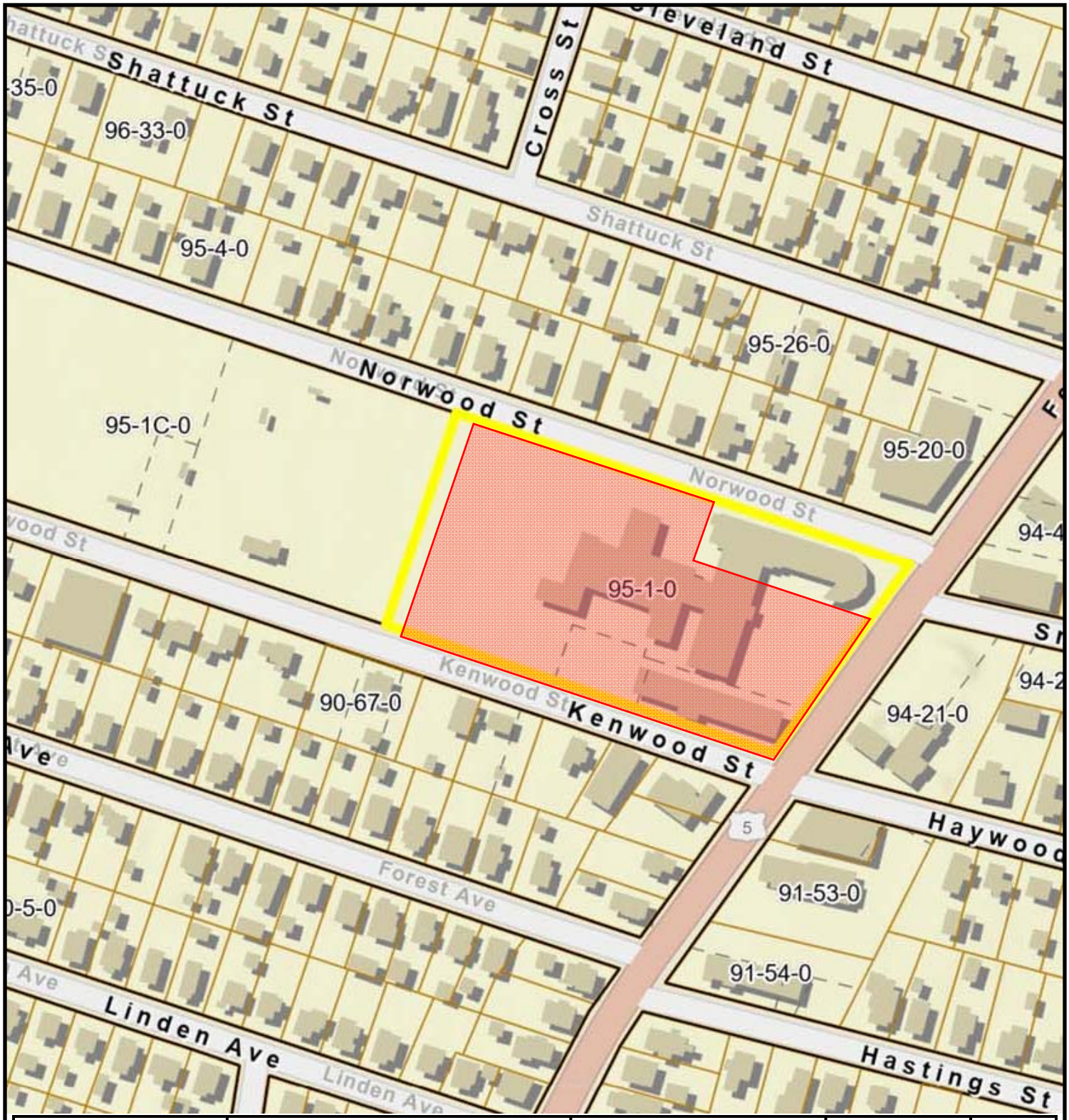
Rev. Date: September 10, 2024

OHI Engineering, Inc.
Engineers and Environmental Scientists

44 Wood Ave
Mansfield, MA
Phone (508) 339-3929
Fax (508) 339-3140

110 Pulpit Hill Rd
Amherst, MA
Phone (413) 835-0780
Fax (413) 549-7918

www.ohiengineering.com



200 100 0 200

1" = 200'

Data Source: Greenfield Assessors

N

Latitude 42o 36' 3.43" N
Longitude 72o 35' 44.26" E

OHI Job # 23-2322

Former Lunt Silversmith
298 Federal Street
Greenfield, MA 01301

OHI Engineering, Inc.
Engineers and Environmental Scientists

44 Wood Ave
Mansfield, MA
Phone (508) 339-3929
Fax (508) 339-3140

110 Pulpit Hill Rd
Amherst, MA
Phone (413) 835-0780
Fax (413) 549-7918

www.ohiengineering.com

Rev. Date: September 10, 2024

Figure 3
Assessors Map

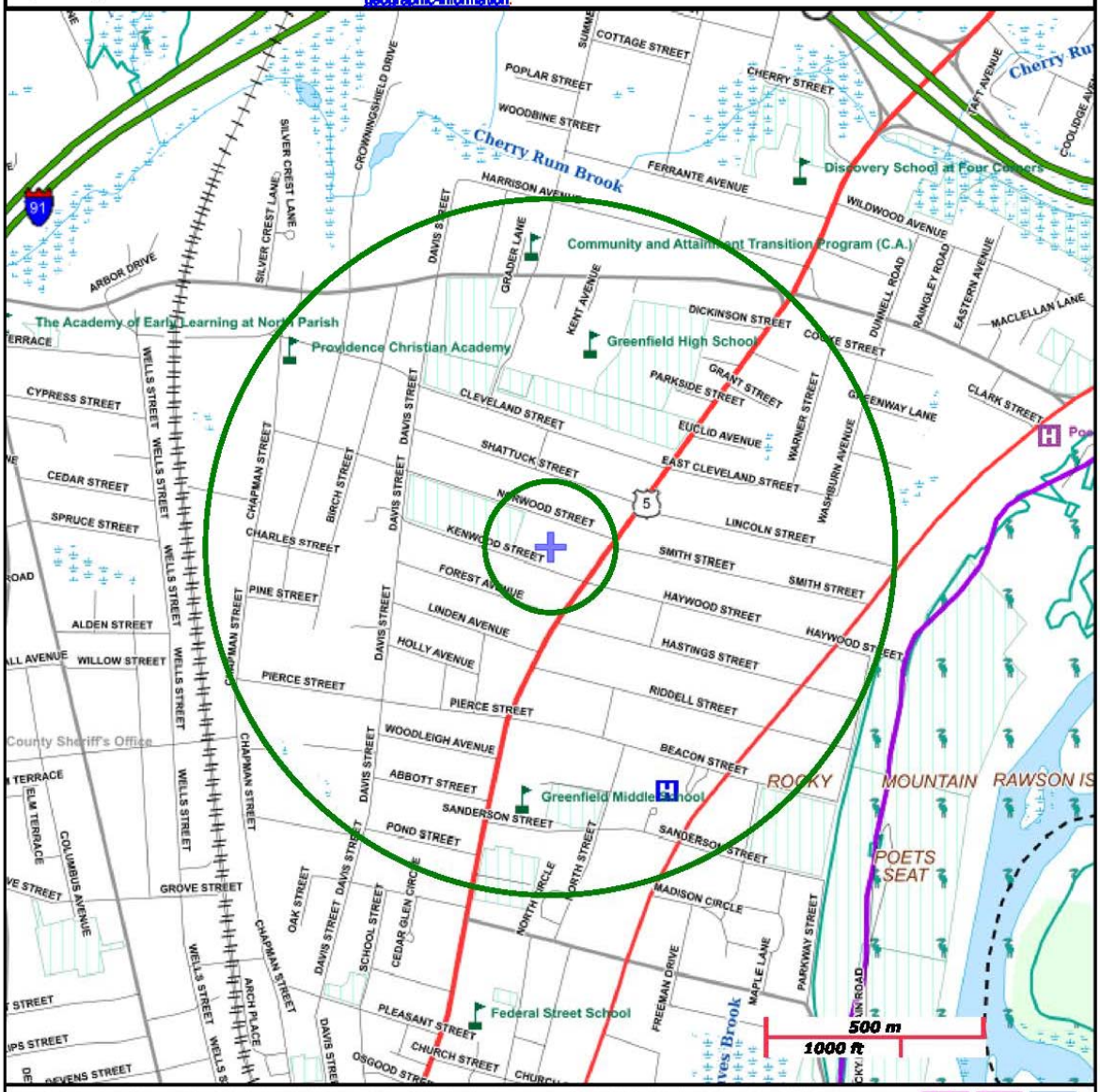
MassDEP - Bureau of Waste Site Cleanup

Phase 1 Site Assessment Map: 500 feet & 0.5 Mile Radii

Site Information:
FORMER LUNT SILVERSMITH
298 FEDERAL STREET GREENFIELD, MA
1-0000016869
NAD83 UTM Meters:
4719305mN, 697245mE (Zone: 18)
September 11, 2024

The information shown is the best available at the date of printing. However, it may be incomplete. The responsible party and LSP are ultimately responsible for ascertaining the true conditions surrounding the site. Metadata for data layers shown on this map can be found at: https://www.mass.gov/orgs/massgis-bureau-of-geographic-information.

MassDEP
Commonwealth of Massachusetts
Department of Environmental Protection



Roads: Limited Access, Divided, Other Hwy, Major Road, Minor Road, Track, Trail
Boundaries: Town, County, DEP Region; Train; Powerline; Pipeline; Aqueduct
Basins: Major, PWS; Streams: Perennial, Intermittent, Man Made Shore, Dam
Aquifers: Medium Yield, High Yield, EPA Sole Source
Non Potential Drinking Water Source Area: Medium, High (Yield)
PWS Protection Areas: Zone II, IWPA, Zone A
Hydrography: Open Water, PWS Reservoir, Tidal Flat
Wetlands: Freshwater, Saltwater, Cranberry Bog
FEMA 100yr Floodplain; Protected Open Space; ACEC
NHESP Pri-Hab of Rare Species; Vernal Pool: Cert., Potential
Solid Waste Landfill; PWS: Com.GW,SW, Emerg., Non-Com.

Latitude 42o 36' 3.43" N
Longitude 72o 35' 44.26" E

Data Source: MassGIS, Commonwealth of Massachusetts Executive Office of Environmental Affairs IUSGS

OHI Job # 23-2322

N

Former Lunt Silversmith
298 Federal Street
Greenfield, MA 01301

OHI Engineering, Inc.
Engineers and Environmental Scientists

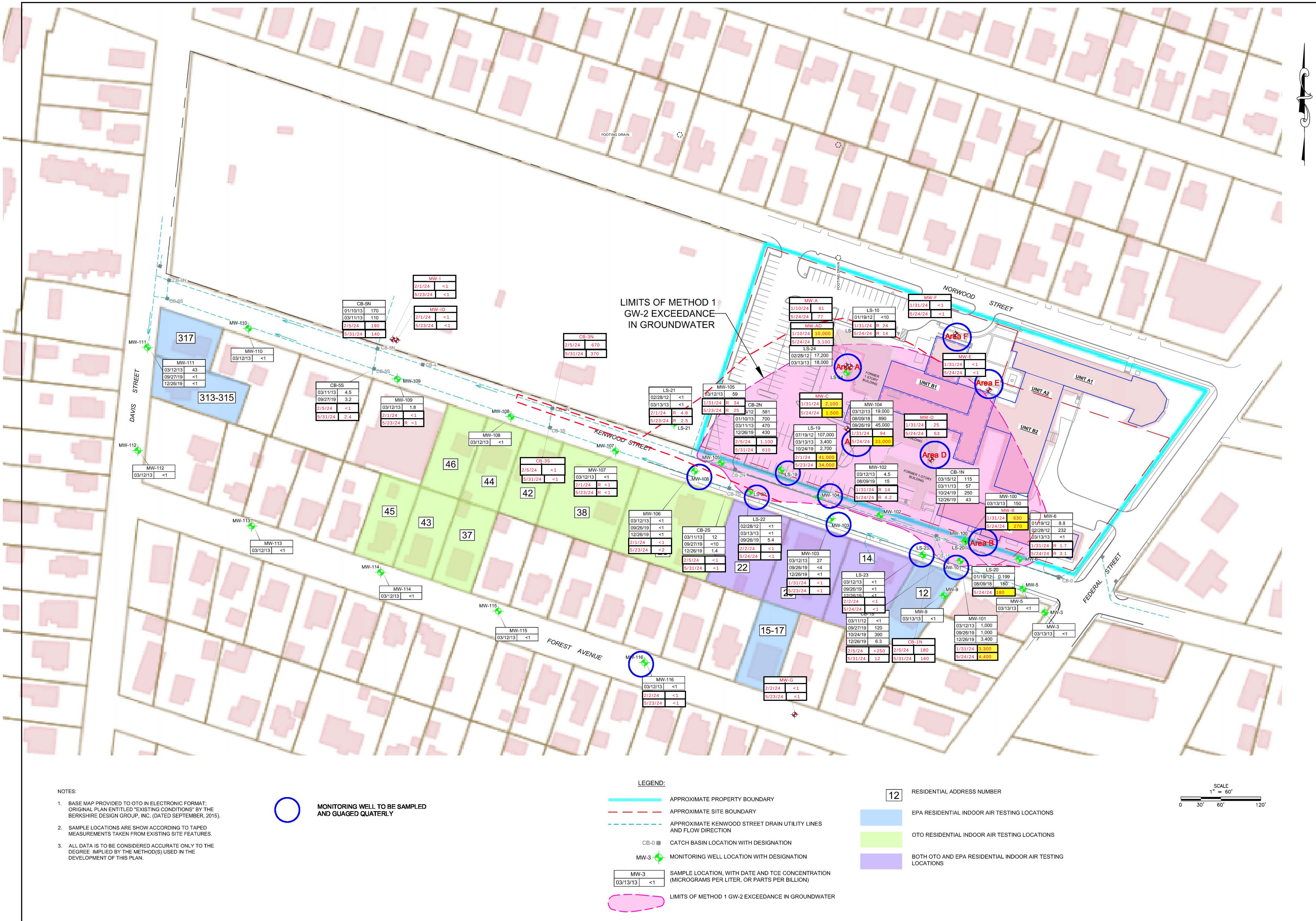
44 Wood Ave
Mansfield, MA
Phone (508) 339-3929
Fax (508) 339-3140

110 Pulpit Hill Rd
Amherst, MA
Phone (413) 835-0780
Fax (413) 549-7918

www.ohiengineering.com

Rev. Date: September 10, 2024

Figure 4
Priority Resource Map



Data Source: Base Plan: Revised Phase II SOW, Figure 5 (OTO, 5/2023)
New Data (OTO, 2/24, 4/24, 7/24)

MassDEP RTN # 1-18869
OHI Job # 23-2322

Rev. Date: September 10, 2024

Former Lunt Silversmith
298 Federal Street
Greenfield, MA 01301

Figure 5
TCE in GW Results

1" = 60'

Latitude 42o 36' 3.43" N ❖ Longitude 72o 35' 44.26" E

44 Wood Ave
Mansfield, MA
Phone (508) 339-3929
Fax (508) 339-3140

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OHI Engineering, Inc.
Engineers & Environmental Scientists

LEGEND:

CB-0 CATCH BASIN LOCATION WITH DESIGNATION

DRAIN LINE AND FLOW DIRECTION

SCALE
1" = 250'
0 125' 250' 500'

O'Reilly, Talbot & Okun
ENGINEERING ASSOCIATES

293 Bridge Street, Suite 500 Springfield, MA 01103 413.788.6222
www.OTO-ENV.com

NOTES:

1. BASE MAP PROVIDED TO OTO IN ELECTRONIC FORMAT BY GREENFIELD DEPARTMENT OF PUBLIC WORKS.
2. CATCH BASIN AND SAMPLE LOCATIONS ARE SHOW ACCORDING TO TAPED MEASUREMENTS TAKEN FROM EXISTING SITE FEATURES.
3. ALL DATA IS TO BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD(S) USED IN THE DEVELOPMENT OF THIS PLAN.

PROJECT TITLE:
298 FEDERAL STREET

ADDRESS
GREENFIELD, MASSACHUSETTS

DRAWING TITLE:
CATCH BASIN & OUTFALL LOCATIONS

SCALE:	1" = 250'
PROJ. NO:	J2693-01-02
DRAWN:	CDA
CHECKED:	BHN
DATE:	02/06/2020
REV:	02/09/2024 MEO

FIGURE 3

Figure 6

APPENDIX A

2022 PIP

Public Involvement Plan

RTN 1-0018869

FORMER LUNT SILVERSMITH BUILDING
298 FEDERAL STREET
GREENFIELD, MASSCHUSETTS 01301

401 Liberty Street, LLC
265 State Street
Springfield, Massachusetts
01103

LSP of Record:
Bruce Nickelsen, LSP
O'Reilly, Talbot, and
Okun Engineering
Associates
293 Bridge Street Suite 500
Springfield, Massachusetts 01103

Introduction

The Massachusetts Contingency Plan (MCP) process provides opportunities for public involvement throughout the duration of these response actions. Public involvement during the remedial response action process is undertaken to ensure that the public is both informed of, and involved in, planning for remedial response actions. For sites where the public indicates interest in becoming involved in this process, the site is designated as a "PIP site" and requires the preparation of a plan that identifies specific activities that will be undertaken to address public concerns to the extent possible.

On or about December 1, 2021 the City of Greenfield received a notice from residents of the City of Greenfield, Massachusetts requesting that the former Lunt Silversmiths site (the "Site) located at 298 Federal Street in Greenfield, Massachusetts to be designated as a Public Involvement Plan (PIP) site, under Massachusetts General Laws Chapter 21E (M.G.L. c.21E) and 310 CMR 40.14. In response to the petitions filed, the City forwarded such notice to 401 Liberty Street, LLC ("401 Liberty"), the party actively conducting environmental remediation efforts at the site. 401 Liberty has designated the Site as a PIP site pursuant to the MCP and is responsible for implementing the Public Involvement Plan. A public repository will be established for the site in the Greenfield Public Library, 402 Main Street in Greenfield Massachusetts. All documents pertaining to the site can also be found on the Mass. DEP website at:

https://eeaonline.eea.state.ma.us/portal#!/wastesite/1-0018869

The draft PIP will be reviewed by the public and revised based on comments submitted. The final PIP will incorporate public comments or questions received following issuance of the draft PIP. The final Plan will be implemented in conjunction with the development and implementation of remedial response actions for the disposal site.

This draft Plan will be presented by 401 Liberty Street, LLC at a public meeting on February 15, 2022, being held remotely. Comments on the draft Plan are encouraged and may be submitted at the meeting or by writing to:

Samuel R. Prickett
265 State Street
Springfield, MA 01103

srp@raipher.com

1. SITE BACKGROUND

1.1 Summary of Investigations

The Site is a Limited Commercial (LC) zoned property located at 298 Federal Street in Greenfield, Massachusetts. The property is identified in City of Greenfield assessor's records as parcel 95-1-UTB, and includes approximately 3.8 acres of land. Assessor's records indicate the original Site building was constructed in 1850. Multiple additions were made to the building over time. The former Lunt property was listed as having a finished area of approximately 74,280 square feet prior to demolition activities in 2015 and 2016. The square footage likely includes the northeast corner building (Unit A1) not included in the Site. The current size of building footprints of the Site (not including off-Site Unit A1) is estimated at approximately 25,000 square feet. The series of interconnected buildings include one- and two-story portions constructed primarily of brick.

The property containing the Site is bounded by Norwood Street on the north, Federal Street on the east, Kenwood Street on the south, and baseball fields on the west. south, and Davis Street on the west. Residential neighborhoods are located to the north, south, and west. Development to the east, along the east side of Federal Street, is primarily commercial. The site buildings were previously serviced by municipal water and sewer systems, and were heated by fuel oil. Heating oil was stored in a 30,000-gallon aboveground storage tank (AST) constructed on the northwest corner of the site building. The tank was enclosed in a concrete and cinderblock building. Exterior portions of the site include paved parking areas on the east and west sides of the building. A paved parking area is located on the east side of the building, near the main entrance. Local topography is generally flat and slopes gently downward to the west, toward the Green River, which is located approximately 5,500 feet to the west. The nearest surface water body is the Connecticut River, which is located approximately 4,000 feet to the east of the site.

The former Lunt Silversmiths factory operated from 1902 until approximately 2010. Lunt Silversmiths manufactured pewter utensils, silver plating and sterling silverware, silver plating tableware and hollowware.

In October 2011, Weston & Sampson Engineers, Inc. (W&S) prepared a Phase I Environmental Site Assessment (ESA) for the Franklin Regional Council of Governments (FRCOG). The ESA indicated that the site had been used for industrial purposes for over 100 years, but was vacant at that time. Past use of the facility was identified primarily as silverware manufacturing, but over the years included other products such as bicycle, car and airplane parts, surgical equipment, and military supplies. The Phase I ESA identified areas of Recognized Environmental Concern (RECs), which included the following:

• The site was historically used to manufacture silverware, hollowware, and tableware using high-powered machinery. Processes included cutting, stamping, degreasing, smelting, annealing, electroplating, buffing, and polishing, and utilizing raw hazardous chemicals, including TCE and petroleum products. These processes generated hazardous wastes, including waste silver cyanide, dry cyanide mixture, waste nitrating acid mixture, and nitric acid.

• There were abandoned chemical containers present throughout the building, the majority of which were unlabeled, improperly stored, and in poor condition.

• The site has been identified as a Resource Conservation and Recovery Act (RCRA) generator, and as potentially having a release of TCE. In addition, chlorinated solvents have been detected in groundwater at the site exceeding Reportable Concentrations per the Massachusetts Contingency Plan (MCP).

• There was a 30,000-gallon heating oil AST, age and condition unknown, present on site.

• There were four exterior cyclone units, which had been used to remove silver and other particulates from indoor air within the manufacturing area.

• ACM, lead-based paint, and PCBs were suspected to be present inside the buildings.

In May 2012, O'Reilly, Talbot & Okun Associates, Inc. (OTO) conducted a Phase II ESA on behalf of the City of Greenfield. As part of the Phase II ESA, OTO advanced soil borings and installed monitoring wells; collected soil and groundwater samples; collected water samples from catchbasins and storm drains; collected soil gas samples; and collected indoor air samples. Soil sample analytical results indicated elevated levels of volatile organic compounds (VOCs) [cis-1,2-dichloroethylene (c- 1,2-DCE), TCE, and tetrachloroethylene (PCE)] and metals (arsenic, cadmium, chromium, copper, lead, nickel, and silver) above MCP Reportable Concentrations (RCS-1).

Analytical results of the groundwater samples collected by OTO as part of the Phase II ESA indicated elevated levels of four VOCs (DCE, TCE, PCE, and vinyl chloride) above MCP RCGW-2. Analytical results of the catchbasin water samples indicated elevated levels of DCE, TCE, and PCE, with concentrations of TCE exceeding the MCP surface water benchmarks. Soil gas sample analytical results indicated elevated levels of TCE above the Massachusetts Department of Environmental Protection (MassDEP) Commercial/Industrial Sub-Slab Screening Values. Indoor air samples indicated elevated levels of TCE and PCE above the MassDEP Commercial/Industrial Indoor Air Threshold Values.

In March 2013, OTO conducted additional investigation activities as part of the Phase II ESA. These activities included advancing soil borings and installing 17 additional monitoring wells; collecting 10 additional soil samples; conducting an elevation survey of new wells and existing catchbasins; collecting groundwater samples from the 17 newly installed wells and eight existing wells; collecting water samples from six stormwater catchbasins along Kenwood Street; and collecting sediment samples from the Kenwood Street catchbasins. Analytical results were consistent with the known VOC contamination at the site.

The EPA performed pre-removal assessment between March and July 2014 and additional assessment both before and after soil excavation from May through August 2015. Analyses of shallow soils (the upper 0.5 feet) was performed throughout the Site. Analyses were performed for the VOCs TCE, tetrachloroethylene (PCE), lead, and arsenic using a mobile laboratory and off-Site laboratory following EPA protocols.

The EPA assessment included a soil sample (top six inches) from below a former cyclonic dust collector on the north side of Unit B1. This sample contained 860 mg/kg of silver. Following the EPA Removal Action in 2015, it was unclear whether soil had been removed from this location by EPA. As a result, in October, 2015 OTO performed a shallow grid soil sampling program of this area. The program included nine soil samples collected from the upper six inches of soil in a grid pattern around the former cyclonic dust collector. The former location was identified by the presence of the four concrete footings for the former dust collector. The soil samples were analyzed for antimony, arsenic, lead, silver and zinc.

In August, 2017 OTO performed soil explorations in advance of redevelopment activities at the Site. Previous Site redevelopment activities focused on interior building renovations, but the August 2017 explorations were performed prior to soil regrading and were incorporated into a RAM Plan to support the redevelopment. The explorations consisted of shallow hand auger samples from zero to two feet below grade and shallow borings to five feet. The soil samples were screened for VOCs and analyzed for the metal's antimony, arsenic, lead and silver.

The primary contaminants of concern (COCs) in Site soils were the metals antimony, arsenic, lead and silver, and the chlorinated solvent TCE. Most of the locations with elevated metals concentrations were located in shallow soils in five locations which were subsequently excavated.

Groundwater sampling was performed at the Site in 2012, 2013, 2016, 2018 and 2019. Each of these sampling rounds were performed by OTO using low flow sampling methods. The groundwater samples were analyzed for VOCs, petroleum hydrocarbons, dissolved metals and cyanide at Spectrum Analytical (now Eurofins Spectrum Analytical) and Contest Laboratory. OTO conducted assessment of potential off-Site VOC impacts in the residential neighborhood south of the Site in 2013. This entailed the installation of 17 additional monitoring in Davis Street, Forest Street, and Kenwood Street. Each of these monitoring wells, along with a number of the on-Site monitoring wells were sampled in 2013.

In 2016, nine one-inch diameter shallow groundwater monitoring wells were installed by OTO in the basement of Unit B1 and sampled for VOCs. Groundwater from a sump in the northern basement of Unit B1 was also sampled. In 2018 and 2019, additional sampling and analysis for VOCs was performed on a series of monitoring wells on-Site and immediately downgradient in and adjacent to Kenwood Street.

1.2 Summary of Remediation

Remediation has been performed as part of the EPA's Removal Action and under OTO's Immediate Response Action (IRA) and Release Abatement Measure (RAM) Plans. These have consisted of:

1. Excavation and off-site disposal of a total of 1,358 tons of soil from two areas containing elevated metals and/or chlorinated VOCs and from below the cyclonic dust collectors by EPA in 2015;
2. Installation of a Passive Exposure Pathway Mitigation Measure (PEPMM) below Unit B1 to control chlorinated VOCs, completed in January 2018;
3. Installation of a PEPMM below Unit C to control chlorinated VOCs, completed in March 2019; and
4. Excavation of 60 tons of soil from below the former vapor degreaser in Unit C in October 2019.

1.3 Summary of Phase II Comprehensive Environmental Site Assessment

The Phase II Comprehensive Environmental Site Assessment report describing Site investigations, remediation and the Method 3 risk characterization was submitted to MassDEP in April, 2020. The risk characterization found that the Site meets a condition of No Significant Risk to human health, public welfare, safety and the environment subject to certain restrictions to be implemented in an Activity and Use Limitation. The proposed limitations include continued maintenance of the PEPMM's below Site buildings to control vapor intrusion, continued non-residential use, and a soil management and health and safety plan for future construction activities.

2. ADDRESSING PUBLIC CONCERNS

The process for assessing and cleaning up disposal sites as set forth in the MCP, is designed to address the effects of the site on health, safety, public welfare, and the environment. Once a release of oil or hazardous materials has been confirmed at a disposal site (Phase I of the remedial response action process), the process proceeds to:

Phase II - Comprehensive field investigation of the nature and extent of the contamination,and an evaluation of any risks posed to the public and the environment from the site (Phase II);

Phase III - Identification and evaluation of remedial response action alternatives and selection of feasible measures that will achieve a permanent cleanup at the site (Phase III);

Phase IV/V – Design and implementation of the selected remedial response actions; and

Response Action Outcome – Evaluation of Site risk and closure submittal.

Physical work at a disposal site includes sampling and other environmental field testing, and the implementation of the selected response actions. It may also include the implementation of measures designed to stabilize conditions at the site to prevent the continued migration of contaminants or eliminate an imminent threat to public health, safety, welfare, or the environment until remedial response is underway (i.e., interim or short-term measures). In cases where a Permanent Solution is achieved prior to completion of one of the later phase reports (III, IV or V) the PIP process ends.

At each step of the remedial response action process, plans for work are developed, the work is conducted, and reports describing results and recommendations for the next step are prepared. The documents which describe each of these steps are the cornerstone of the remedial response action planning process, since they provide the information necessary to make decisions about how a site should be cleaned up.

3. PURPOSE

In accordance with the MCP (310 CMR 40.1400), activities undertaken to involve the public in response actions serve two purposes:

- To inform the public about the risks posed by a disposal site, the status of remedial response actions, and the opportunities for public involvement; and
- To solicit the concerns of the public about a disposal site and remedial response actions so that, to the extent necessary, these concerns can be addressed and incorporated in planning remedial response actions.

To meet each of these objectives, 401 Liberty proposes to undertake specific activities during the remedial response process at the site. These activities are described below.

4. INFORMING THE PUBLIC

401 Liberty will provide Site-specific information to the public by:

- establishing an information repository;
- providing Site-specific fact sheets in accordance with the DEP guidance;
- making responses to comments on regulatory submittals available to the public;
- developing and maintaining a mailing list to distribute information about the Site and public involvement activities;
- providing advance notification to local officials and residents about Site activities, as appropriate under the MCP.

4.1 Information Repositories

Greenfield Public Library, 402 Main Street in Greenfield Massachusetts.

All documents pertaining to the site can also be found on the Mass. DEP website at:

https://eeaonline.eea.state.ma.us/portal#!/wastesite/1-0018869

Local Information Repositories:

401 Liberty will establish a local information repository to provide Greenfield residents with easy access to information about site investigations and remedial plans. The site information repository will contain copies of documents filed with the DEP as necessary under the MCP, potentially including: work plans; sampling and field-testing plans; technical reports and documents summarizing results and recommendations; press releases; public information materials; the Public Involvement Plan; summaries of responses to comments received; and copies of public notices about the Site.

401 Liberty will compile information about the site to be included in the depository. The information repository for the Site will be Greenfield Public Library, 402 Main Street in Greenfield Massachusetts.

4.2 Mailing List

401 Liberty will establish a mailing list for the Site (the "Mailing List"). The Mailing List may include: petitioners, interested residents, site abutters, municipal officials (specifically the city Manager and the Chairperson of the Board of Health), state legislators, DEP, and anyone else indicating an interest in receiving information about the site.

4.3 Activity and Use Limitations

An Activity and Use Limitation restricts use of a site or portion of a site with the intent of reducing the risk a site poses to human health, the environment or safety. Within 30 days after recording and/or registering any original, amended, released or terminated Activity and Use Limitations (AUL), local officials and the public will be informed of the limitations that apply to activities and/or uses of the Site. A copy of the recorded and/or registered AUL will be provided to the:

- Chief Municipal Officer;
- Board of Health;
- Zoning Official; and
- Building Code Enforcement Official.

A legal notice, which indicates the recording and/or registering of any original, amended, released or terminated AUL, will be published in the Greenfield Recorder. The notice will be in the form established by the DEP and will include:

- The name and address and Release Tracking Number (RTN) for the Site;
- The type of AUL;
- Information about the project file and where the AUL can be reviewed; and
- The name address and telephone number of the person recording and/or registering the AUL and from whom the public may obtain additional information.

A copy of this legal notice will be submitted to the DEP within seven days of its publication.

5. SOLICITING PUBLIC INVOLVEMENT

5.1 Public Meeting

401 Liberty will brief the public about the status of the Site. Meetings will serve two purposes:

1) To provide community officials and the general public with progress report regarding remedial response actions at the site; and

2) To provide an opportunity for the public to question and comment on remedial action plans for the Site.

401 Liberty will send notices announcing public meetings to individuals on the Mailing List and publish a notice in The Greenfield Recorder at least 14 days prior to any meeting dates.

5.2 Public Comment Period

401 Liberty will provide opportunities for the public to submit comments about new documents concerning the Site. When new documents are available, they will be provided to the information repositories, and a notice of their availability will be sent to the Mailing List. The notice will include the title of the document, where it is available for review, information about how to submit comments to 401 Liberty, and the length of the public comment period (typically 20 days).

5.3 Response to Comments

401 Liberty will prepare a summary of all comments it has received for available for public comment, and 401 Liberty's responses to each within 60 days of the close of the public comment period. A copy of this response summary will be sent to all those who submitted comments and will be placed in the information repository and the DEP Site files. 401 Liberty will also send a notice of availability of the response summary to the mailing list.

Please see Exhibit B to this plan for a list of questions and comments received by the public and their corresponding answers.

6. SCHEDULE FOR PUBLIC INVOLVEMENT ACTIVITIES

Following the public meeting, there will be a 20-day public comment period to allow the public to submit written comments on the document or the status of response actions. Following the close of the public comment period, 401 Liberty will prepare a summary of the meeting and all comments received at the meeting and during the public comment period. The summary will include a description of which comments were incorporated into the subject document and which were not incorporated and an explanation of why. A copy of the responses to comments will be sent to the mailing list and included in the public repository within 60 days of the close of the public comment period.

7. RESPONSIBILITY FOR IMPLEMENTING PUBLIC INVOLVEMENT PLAN

The 298 Federal Street site has been designated a PIP Site and 401 Liberty is responsible for conducting both remedial and public involvement activities at this site. 401 Liberty has developed this Public Involvement Plan and is responsible for carrying out the activities listed in this Plan during the site cleanup process. To ensure that Public Involvement Plans are implemented properly by Potentially Responsible Parties (PRP), DEP has established an appeal process for handling disputes about public involvement activities at disposal sites. The appeal process is initiated when ten or more residents of the community in which the site is located or of a community potentially affected by the site submit a signed petition to the PRP and to DEP stating that the PRP is not implementing activities agreed upon in the final Public Involvement Plan. The petition must provide specific information documenting the PRP's failure to implement specificsections of the Plan. Upon receipt of the appeal petition, the PRP must provide written confirmation of receipt to the petitioners and provide a copy of this letter to DEP. The PRP then has twenty calendar days to work with the petitioners to address their concerns. Within this twenty-day period, the PRP must respond to the petition in writing, describing how each issue identified by the petition will be addressed. Any resulting changes in public involvement activities must be incorporated into the public involvement plan. A twenty-day public comment period must then be held on the revised Plan. Any revisions to the Plan or specific responses to the appeal petition must be copied to DEP. If the PRP and the petitioners cannot resolve the petitioners' concerns within twenty calendar days, the petitioners must each submit written information to DEP documenting their concerns, actions taken to date to resolve the issues, andtheir inability to resolve the issues independently of DEP. When DEP receives this information, it will take the following actions:

- Review the information Packages to assess specific petitioner complaints, identify other community concerns, and determine what public involvement activities, as specified in the

Plan have not been conducted. DEP may inspect local information repositories, review notification letters, and contact members of the Notification List.

- Determine whether the PRP has made any efforts to address community issues. This may include a review of meeting summaries, correspondence or other formal attempts to resolve community concerns about insufficiencies in public involvement activities. If, based upon reviewof the appeal petition. DEP determines that the Public Involvement Plan is not being implemented, DEP may take one or more of the following actions:
  - Requiring the PRP to hire a public involvement consultant specifically to perform activities contained in the final Plan; and/or
  - Conducting an audit of the site to determine whether the PRP is conducting the response action in compliance with the MCP, and/or the final Public Involvement Plan.

8. MAILING LIST

Please see Exhibit A to this plan for the full mailing list.

Exhibit A

Name:	Greenfield Street Address:	Email Address:	Phone Number
Glen Ayers	254 Davis Street	glenayers@gmail.com	413-834-5729
Norman Hirschfeld	41 Meadow Lane	nhms41@comcast.net	
Virginia Desorgher	43 Silvercrest Lane	ginnydoll4@yahoo.com	5083143776
Carisa Clifford	390 Mohawk Trail	ckmc90@comcast.net	9192599104
John Bottomley	63 Haywood St	jbottoml@gmail.com	
John Bos	8 Silver Crest Lane	jhbos@verizon.net	14136252082
Sheila Gilmour	134 High St	scullen246@gmail.com	
Susan C Worgaftik	45 Forest Avenue	suworg1@gmail.com	4132210354
Mireille Bejjani	92 Peabody Lane, Greenfield MA 01301	mbejjani8@gmail.com	
Karen Shapiro Miller	324 Davis St MA 01301, Apt. B	karenmiller118@gmail.com	4136873800
Daryl Beck	12 Birch St.	greasewrench@gmail.com	
kurt schellenberg	73 MAPLE ST	kurtschelle@gmail.com	8025795160
Jovonna Van Pelt	28 Linden Ave	jovanpelt@comcast.net	
Douglas Selwyn	38 Forest Avenue	dougselwyn@aol.com	2066790189
Jan Maher	38 Forest Ave.	jcmaher@aol.com	2062349146
Douglas Mayo	143 Wells Street	dwmayo59@gmail.com	
Matthew perry	31 Norwood st.	Perrymatthew67@gmail.com	603-208-6613
Marion Griswold	46 Hastings St	mbgriswold@yahoo.com	
Rachel Silverman	33 Norwood Street	mizsilverman@gmail.com	
Sarah Adam	40 Birch St	madsahara@gmail.com	
Dorothy McIver	88 Columbus Ave	twomoons45@gmail.com	14138347269
Marcia Webster	31 Norwood St	exth64@yahoo.com	4136266968
Emily Greene	260 1/2 Davis St.	Guacomolly54@gmail.com	14133258599
Wayne Garfinkel	11 Emily lane	waynegarfinkel36@gmail.com	
Dawn Rockwell	21 Mohawk Trail	darns-soled-0p@icloud.com	8283353447
Jim Geisman	64 E. Cleveland St.	jgeisman@gmail.com	6179012087
Wendy Goodman	529 Green River Rd	wendygg2000@yahoo.com	4137737899
Christine Forgey	290 Barton Road	chrisboss1360@hotmail.com	4137726990
Rachel Gordon	10 EASTERN AVE	rachel.h.gordon@gmail.com	16125990837
Norm Hirschfeld	41 Meadow Lane	nhms41@comcast.net	413-773-0201
Benjamin Miner	284 Chapman St.	sethbenjamin@gmail.com	
KAREN RENAUD	74 CRESCENT ST	SMALLSTIX@GMAIL.COM	413-841-1053
Louise Amyot	56 Madison Circle	lamyot@yahoo.com	
Devorah Rosenberg	17 Madison Cir	devorahnomad@gmail.com	15083414474
Marianna Ritchey	35 Beech St	captainsquid@gmail.com	
Gretchen Krull	23 Madison Circle	Galynkrull@gmail.com	
Henry East-Trou	23 Madison Circle	Heasttrou@gmail.com	
Donna Festinger	24 Oak Street	dfestinger1@gmail.com	413-774-6567
David E. Lewis	54 High Street Apt. 405	delewis43@hotmail.com	14135227292
Natascia Pica	45 Birch Street	natyp74@gmail.com	
Douglas Mayo	143 Wells St	dwmayo59@gmail.com	413-775-3878
Dodi Melnicoff	14 Kenwood Street	Dodimelnicoff@gmail.com	2677602051
Rui Santos	33 Norwood Street	rasmoon66@yahoo.com	4133585567
Joshua Paul Michal	82 Cleveland Street	joshmichal@gmail.com	15133128398
Sandra Stevens	20 Grinnell St. #4	Silversingle123@gmail.com	
William Drake	245 Conway Street	bdrake79@gmail.com	4136955574
Dawn Barrett	203 Chapman St Greenfield MA	dbarrett08@gmail.com	
Gregory St. Germain	301 Chapman Street	cullenam89@gmail.com	
Jennifer Renehan	33 Woodleigh Ave	jennifermason41@gmail.com	9783876699
Sandra Boston	15 Abbott Street	bostons111@gmail.com	
Michael Gove	42 Kenwood St	msgove@comcast.net	4137738636
Dawn	88 Hope Street	dawnMmorin@yahoo.com	4137742763
Dawn Barrett	203 Chapman St	dbarrett08@gmail.com	

Exhibit A

Mark Schwaber	5 Ferrante Ave	markschwaber@gmail.com	
Susan Malley	12 Congress St	wordspring99@gmail.com	14137738457
Jean Wall	301 Country Side	jeanwall1313@gmail.com	
Marianne Bullock	179 Hope Street	Councilor.bullock@greenfield-ma.gov	
Hillary Hoffman	30 Abbott Street	Hillary.hoffman@gmail.com	
David Cohen	335 Green River Rd	davidjc@comcast.net	
Patricia A Williams	147 Davis Street	Mspwilliams007@gmail.com	
Judith Atkind	335 Green River Rd	judithga@comcast.net	413 773 3584
Edward Schwerin	202 Munson Street	edwardschwerin@gmail.com	
Joshua Breitner	24 linden avenue	jsbreitner@gmail.com	
Laura MacKay	59 Madison Cir	noncework@gmail.com	
Elizabeth Diamond	12 Devens Street	elizabeth.a.f.diamond@gmail.com	
Pamela Goodwin	54 High St. Apt 307	pgoodwin038@gmail.com	413-834-0398
Edie Heinemann	41 Garfield St.	Ediesh82346@gmail.com	
Heidi Garfinkel	184 Chapman St.	garfinkelheidi@gmail.com	
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EXHIBIT B – Q&A

Q1: Does Raipher Pellegrino have a financial interest in the outcome of the development at 298 Federal Street in Greenfield, is this a conflict of interest?

A1: Yes Mr. Pellegrino has a financial interest in the outcome of the development at 298 Federal Street. No, this is not a conflict of interest.

Q2: Who hired and is directing the Licensed Cite Professional ("LSP")?

A2: The LSP was hired jointly between the City of Greenfield (hereinafter the "City" or "Greenfield") and 401 Liberty Street, LLC ("401," "401 Liberty").

Q3: Is it possible to replace O'Reilly, Talbot, and Okun, ("OTO") as the LSP?

A3: It is technically possible, but there is no plan to do so at this time.

Q4: Are the Parties aware of the Mass Attorney General lawsuit against OTO and could there be similar issues with the Lunt site?

A4: The parties are aware of these happenings, but these are separate and distinct issues from the cleanup at 298 Federal Street in Greenfield and are not relevant to this remediation.

Q5: Who determines the standard and scope of the cleanup?

A5: The LSP and the Department of Environmental Protection ("DEP").

Q6: The expectation of the community was that the site would be cleaned up to residential standard, why is the site not being cleaned up to a residential standard?

A6: The site meets the criteria for a commercial property not a residential property. We are not aware of a stipulation that the property be cleaned up to residential standards.

Q7: Define the role of the following entities in determining the AUL requirements:

a. 401 Liberty, LLC

b. Mayor of Greenfield

c. LSP

A7: The LSP manages the site and reports to 401 Liberty and Greenfield before filings are made with DEP, and renders opinions on whether work is being completed pursuant to the Massachusetts Contingency Plan.

Q8: Who drafted the lease between the City of Greenfield and 401 Liberty Street, LLC?

A8: Lawyers for Greenfield and lawyers for 401 Liberty.

Q9: Have Raipher or 401 Liberty had communications with Mayor Wedegartner regarding the lease terms, and can they share these communications?

A9: The terms of the Lease and communications between 401 Liberty and the City are not relevant to the environmental remediation of the site or this PIP process, however the lease is a public record and can be obtained from the Town of Greenfield.

Q10: Have Raipher or 401 Liberty had communications with Mayor Wedegartner regarding the AUL designation, if yes can these be shared?

A10: The City of Greenfield is a partner in the environmental remediation planning at the site but the AUL has not been finalized at this time.

Q11: What role does the City and the Mayor play in the next stages of cleanup?

A11: The conclusion of the Phase II Comprehensive Environmental Site Assessment was that a condition of No Significant Risk as that term is defined by the Massachusetts Contingency Plan has been achieved. Possible next stages of clean-up are yet to be determined.

Q12: Describe the carcinogenic effects of TCE and dangers of long-term exposure?

A12: Please see Exhibit C to the PIP for further information about TCE.

Q13: How long were people in BHN exposed to TCE before the current passive system was installed?

A13: Active ventilation of the buildings was initiated upon occupancy and indoor air testing indicated that the TCE concentrations met applicable guidance.

Q14: Were staff and residents of the facility notified of exposure risk?

A14: BHN was notified and the results were provided to them.

Q15: Were staff and residents notified of imminent hazard alert (IRA)?

A15: BHN was notified and the results were provided to them.

Q16: Why was Unit A1 not included in the remediation area or AUL delineation?

A16: There are not contaminants at this condominium site. This was historically used as a storefront and restaurant.

Q17: Please explain levels of Imminent Hazard Alerts and their implications?

A17: When a condition which poses an Imminent Hazard or could pose an Imminent Hazard is identified it is considered a two-hour notification condition, requiring that Immediate Response Actions (IRAs) be performed. In the case of the former Lunt building, the indoor air concentrations were ultimately found to not represent an Imminent Hazard, but the notification was made to DEP under an abundance of caution and the Passive Exposure Pathway Mitigation Measures installed under an IRA.

Q18: Why was a sub-slab depressurization system not installed as recommended by the LSP?

A18: An SSDS was not promised by the LSP. An SSDS was the first type of system contemplated for the site but after further work and review of the site conditions, the current passive system was deemed to be a better fit under the conditions and circumstances. The current system has successfully reduced levels of TCE to No Significant Risk as defined by the Massachusetts Contingency Plan.

Q19: Is it true that a sub-slab depressurization system could reduce exposure to TCE to zero or near zero?

A19: We cannot speculate on how such a change would affect indoor air concentrations. However, the two passive systems installed below the two building floors have reduced indoor air concentrations of TCE to concentrations below No Significant Risk for inhalation for the buildings uses.

Q20: When were the last air quality tests done?

A20: December of, 2019.

Q21: When will tests be completed going forward?

A21: There are no plans for further air testing at this time. The system has been shown to perform as needed—further tests will be completed if there are significant changes or renovations to the site necessitating further testing

Q22: Fluctuating air quality numbers show that contamination of TCE is not controlled—is this true and how is this being dealt with?

A22: This is not true.

Q23: Have neighborhood homes been rechecked for contamination since 2014?

A23: Not to our knowledge.

Q24: Has adequate testing been completed to accurately show spread of contamination into the neighborhood?

A24: Yes. The DEP and EPA came in an performed much of the work and testing, and showed that TCE was not spreading across the street. Each of the tested properties received “No Further Action” letters from EPA.

Q25: Are contaminants spreading into the surrounding neighborhood through the groundwater?

A25: Not to the knowledge of 401 Liberty or the City of Greenfield. The DEP and EPA came in an performed much of the work and testing, and showed that TCE was not spreading across the street. Each of the tested properties received "No Further Action" letters from the EPA.

Q26: What is the difference between the Passive System currently installed and the "active" SSDS system which was recommended to be installed?

A26: The passive systems do not use active fans to create a vacuum below the building floors.

Q27: Some of the measurements for TCE in the Phase II report are above commercial thresholds. Why is this OK?

A27: The threshold values from the Phase II Report are not standards that must be met, but conservative screening values which indicate that additional evaluation is needed. The Method 3 risk characterization included with the Phase II report demonstrates that a condition of No Significant Risk exists for inhalation of vapor exposures to current site workers and residential patients in portions of the site referred to as Units B1 and C with the operation of the PEPMMs. The evaluation of inhalation of vapor exposures was considered to be health protective of lesser-exposed receptors, such as visitors.

Q28: Is there a method for groundwater interception and treatment planned or installed? Is this necessary?

A28: Groundwater contamination is already being intercepted and is not disseminating into the community. It is being diluted in the sewer to non-detectible levels

Q29: Will the new owner of the former Lunt property be responsible for contamination that has spread into the neighborhood?

A29: Groundwater contamination is already being intercepted and is not disseminating into the community. It is being diluted in the sewer to non-detectible levels.

Q30: Why were two Phase II reports done, is this normal?

A30: There were not two Massachusetts Contingency Plan Phase II reports done. There was an Environmental Site Assessment performed in 2012 which may be being confused as a Phase II report.

Q31: Are the tenants at the site aware of the environmental issues and TCE levels in the building?

A31: Yes.

Q32: Will there be continued monitoring of contaminant levels at the site?

A32: There are currently no plans for continued monitoring of contaminant levels. However, there will be continued monitoring of the health of the system to ensure structural and mechanical integrity.

Q33: Who is directing the cleanup at the site? What party has liability for environmental issues at the site?

A33: This question calls for legal conclusions and is beyond the scope of the PIP process.

Q34: Can you explain why Attorneys from 401 Liberty conducted the interviews for the PIP? Why weren't the questions gathered by Samuel Prickett before the meeting answered?

A34: 401 Liberty Street, LLC is the tenant and acting in cooperation with the Town of Greenfield to address the environmental issues at the Lunt Site. As stated at the outset of the meeting the questions received prior to the meeting we put into categories in an effort to answer and allow discussion from all that participated. Further, Attorney Pellegrino clearly asked on multiple occasions if anyone had any further questions and in fact numerous additional questions were asked, answered and discussed at the PIP meeting.

Q35: Was the LSP in control of the safety of the site and in charge of preventing public exposure to hazardous waste? Is the LSP hired and directed by 401 Liberty? Please provide copies of payments to OTO?

A35: Yes, the LSP currently works for both 401 Liberty Street, LLC and the Town of Greenfield. Payments made to the OTO are private financial documents and beyond the scope of PIP and will not be produced.

Q36: Who wrote the lease? Please provide the signature page of the lease.

A36: Attorneys for the town and 401 Liberty LLC prepared the lease. The lease is a public record and can be obtained from the Town of Greenfield.

Q37: OTO stated that UNIT A had a different owner. S&W Realty was owned by James Lunt, who was the President and Treasurer of that corporation. He was also the owner of Lunt Properties. The buildings were all connected by hallways and underground pipes and utilities so why didn't you include all buildings as part of the remediation?

A37: As was explained in the PIP meeting, unit A of the condominium does not have any environmental issues to be addressed. Unit A is not leased from the Town of Greenfield.

Q38: Initial cost estimates for the SSDS and 20 years of operation and maintenance were included in your lengthy reports. The estimate for the SSDS and operation and maintenance was $350,000. The initial estimate for the cost of remediation was $1,044,000 in 2015. Only $507,000 was spent on remediation. Did the city receive the $330,000 that you didn't spend? See lease agreement page 1. Please send copies of all bills paid remediating the property. My understanding is that you used some of the remediation grant money for construction costs instead of remediation so please document your expenditures for all remediation.

A38: All initial costs were estimates, not actual amounts spent. As was answered in the PIP meeting the Town of Greenfield has not received $330,000. It is unclear what is being referred to by "you used some of the remediation money for ……" if this is referring to 401 Liberty Street, LLC the answer is that 401 Liberty LLC did not directly receive any grant funds for this project.

Q39: Estimated cost for SSDS with telemetry monitoring for 20 years is $200,000 (see page 24 of the first Phase 2 report by OTO dated 4/2012). This was promised and never installed.

A39: An SSDS was not promised by OTO. An SSDS was the first type of system contemplated for the site but after further work and review of the site conditions, the current passive system was deemed to be a better fit under the conditions and circumstances. The current system has successfully reduced levels of TCE to No Significant Risk as defined by the Massachusetts Contingency Plan.

Q40: Lease states that the property "cannot sublet without written consent of landlord". Please provide written consent especially for unit B1. The building was occupied before any air testing was done. A two-hour IRA was reported to DEP as indoor air level of TCE were so high.

A40: Lease and related documents are not relevant to this PIP process and will not be produced through this process.

Q41: Were the workers notified of high levels of TCE?

A41: It is impossible to give a targeted answer to this question without knowing which workers the question is referencing and the timeframes it is referencing, however when workers were present on the property, active ventilation measures were being taken to ensure exposure was mitigated, or the Passive system was already installed and operational, or both. The environmental conditions and remediations on site were public knowledge and routinely discussed will all associated with the site, including workers.

Q42: On January 21, 2013, the Board of Health, Mr. Pyers, Greenfield's Economic Development Director, the homeowners on Kenwood Street and Forest Street were all informed via letter/email that all indoor air testing was negative. However, on April 23, 2013, indoor air testing results which were positive for TCE were reported to you. On the same day, revised notification letters were sent to a few residents on Kenwood Street notifying them that TCE was present in their homes and over the residential standard. Mr. Pyers and the DEP were both notified of the revised data. Can you explain why the Board of Health wasn't notified?

A42: The City and all departments were well aware of the ongoing remediation efforts being conducted by the EPA, DEP and OTO.

Q43: On April 29, 2016, you notified the Mayor, the Board of Health and MA DEP of your plan to install the SSDS and thoroughly test the air quality of the Franklin Recovery Center for safety prior to occupancy. Did you notify Greenfield's Board of Health or the DEP that you were opening the residential treatment facility prior to doing the safety testing that you had outlined and that is required per MCP vapor intrusion guidelines?

A43: The remediation process has been a cooperative effort with Greenfield, 401 Liberty and both state and federal entities. Information was shared on a timely basis with all parties.

Q44: Who authorized opening the Franklin Recovery Center in early July of 2016 before the vapor intrusion pathway was eliminated and before any indoor air testing was completed? You tested the facility after it was full of patients. You were subsequently notified by the lab that the TCE levels in the air were high. Shortly after you received the notification, you, as required by law, notified the EPA what had occurred in what is known as a two-hour Imminent Release Statement. Why did you say in a public meeting that everything was fine? The indoor air level in the first-floor office was 8.7ug/m3. The residential standard is 0.4. The commercial standard is 1.8. Why did Mr. Nickelson say it was normal when it was so high that a two-hour Imminent Release needed to be filed?

A44: The numbers presented in this question are not "standards" which need to be met, but conservative screening values which indicate that additional evaluation is needed. The Method 3 risk characterization included with the Phase II report demonstrates that A condition of No Significant Risk exists for inhalation of vapor exposures to current Site workers and residential patients in portions of the Site referred to as Units B1 and C with the operation of the PEPMMs. The evaluation of inhalation of vapor exposures was considered to be health protective of lesser-exposed receptors, such as visitors. In the case of the former Lunt building, the indoor air concentrations were ultimately found to not represent an Imminent Hazard, but the notification was made to DEP under an abundance of caution.

Q45: What notifications did you send to the patients and the staff of BHN informing them of their exposure to the cancer-causing vapors of TCE? Medications given to detox residents increase absorption of TCE. Has a toxicologist been consulted to review the meds?

A45: The TCE concentrations in the indoor air indicate that a condition of No Significant Risk exists for inhalation exposures for properties in this commercial use category which includes structures with transient use, such as hospitals. A toxicologist was not consulted to our knowledge, nor did 401 Liberty ever have the identity or personal medical information of any patients at any time due to HIPPA regulations.

Q46: A meeting was held on June 7, 2017 with Mr. Eric Twarog of the City of Greenfield, LSP Bruce Nickelson, Mr. Pellegrino and EPA Representative Eva Tor. See letter titled URGENT LEGAL MATTER dated June 27,2017 which was written after this meeting. On page 2 is the following statement:

"AS STATED IN OUR MEETING, THE INSTALLATION OF THE SSDS WILL NEED TO BE COMPLETED IN THE BHN BUILDING BY 8/31/2017."

An extension was requested. The SSDS was never installed. Instead, in January 2018, the PEPMM was finished. This is a passive system without any monitoring. Please explain how this happened and who was notified in the City of Greenfield and DEP regarding the change of plans.

A46: As was explained in detail during the PIP meeting a passive system was installed and all appropriate parties were actively involved and/or notified as is required.

Q47: Will the City's CNTS status be affected by the purchase of part of Unit A from you in December 2017? 401 Liberty purchased Unit A from S&W Realty Corp. (James Lunt, President and Treasurer) for $500,000 on July 19, 2016. Then the City purchased part of this from you for $1 in December 2017. Why did this transaction occur? What is the status of the Deed 4, Unit A dated December 17, 2017. Does it affect the City's liability? Are you aware that the permitting process was not done correctly? Should you redo this with the deed?

A47: Commenting on the City's CNTS status calls for legal conclusions which are beyond the scope of this PIP plan. The remainder of the questions not relevant to this process and therefore will not be addressed here.

Q48: The graph on page 654 of Lunt Phase 2 report shows areas of increasing vapor intrusion of TCE. Where is the health and safety plan? This plan and the soil management plan were requested by EPA in an URGENT LETTER dated 6/27/2017 which is referenced above.

A48: There is no "graph" on page 654 of the Phase II Report. Tabulated indoor air testing data is shown on that page but it does not show "increasing vapor intrusion". Item 2 in the 6/27/2017 DEP letter (not an EPA letter) discusses the need to evaluate an area adjacent to Federal Street subsequently used to install storm water recharge and to "address unknown soils by collecting soil samples, and if impacted, prepare a soil-management plan to address worker safety and disposal needs, if necessary." This evaluation was performed as described in the Release Abatement Measure report submitted on September 5, 2017.

Q49: Do you know the migration pathway of TCE? The groundwater interception and treatment plan is not available. Where is it?

A49: Yes, as described in the Conceptual Site Model in the Phase II report, the TCE plume "is intercepted by the storm sewer in Kenwood Street, which limited southerly migration into the residential properties south of Kenwood Street. Indoor air testing by MassDEP and EPA is consistent with plume migration data, as indoor air testing has indicated residences south of Kenwood Street are not impacted. Sampling the storm sewer water indicates the TCE is intercepted but dissipates prior to the discharge point of the sewer at the Green River"

Q50: The building on Kenwood Street appears to have the highest number of TCE's in wells, ground water, and sewers. Why weren't any monitoring wells installed inside that building as was done for the first building (the original detox)? When the indoor air testing in that building was done, why wasn't the west end of the building tested? Isn't that where the two cyclones were located?

A50: There were three groundwater monitoring wells immediately downgradient of the building on Kenwood Street (referred to as Unit C in the report) which adequately characterize groundwater in this area. There were three indoor air samples collected on the ground floor along the length of the Unit C building, including one at the west end of the building as shown on Figure 4.

Q51: Revised results and revised letters were sent to Kenwood Street residents. Initial results reported to neighbors and BOH were negative. Revised results were positive. TCE levels in monitoring wells are rising (see monitoring well 104 and 101) TCE levels have increased 150-240% respectively. These are both on Kenwood Street. Considering the significant concentration and rise of TCE in several of the monitoring wells and catch basins on Kenwood Street, can you explain why further testing of down-gradient properties has not been repeated since 2014? Name any wells you reference if you dispute this fact.

A51: We are not aware of revised letters with initial negative reports followed by positive results. We typically detect varying contaminate concentrations in groundwater monitoring wells likely due to seasonal and sampling variability. The TCE plume at the Site is a mature plume and we do not believe the TCE levels are rising. Since each of the residents received "No Further Action" letters from EPA and the TCE plume is being intercepted by the Kenwood Street storm sewer we did not see the need for additional indoor air testing.

Q52: During the PIP meeting, you kept saying that you would do what DEP said you needed to do. Why aren't you doing more testing as requested by numerous citizens? Isn't the LSP responsible for the safety and control of the site?

A52: Citizen input is important, but we rely on the experts and DEP regulations and protocol to determine further action at the site. Despite this, as was said on a number of occasions during the PIP meeting, all of the citizens comments would be considered after the DEP audit was received which would provide guidance on this matter.

Q53: You just asked for a Phase 3 extension. Why wasn't a Phase 3 done right after the Phase 2 in 2012?

A53: The Massachusetts Contingency Plan Phase II Report was not done in 2012, but in 2020. The Phase II referred to in this question from 2012 was the Phase II environmental site assessment. As with any project of this magnitude there are competing deadlines and matters which need to be resolved and additional time was needed to ensure the LSP had ample time to analyze and implement the various remediation efforts. The Phase III deadline has been extended to accommodate this PIP process and resolve any outstanding issues which may be uncovered.

Q54: How will communication be handled with PIP petitioners going forward?

A54: Further necessary notices will be mailed and/or e-mailed to the PIP petitioners utilizing the contact information included in the PIP petition.

Q55: How will documents and information be handled for further stages?

A55: PIP petitioners will be notified and documents included in the information repository as required under the MCP.

Q56: Will there be a repository of information?

A56: Yes. Pursuant to the MCP copies of documents pertaining to the PIP petition and site remediation will be housed at the Greenfield Public Library and available upon request. All Documents submitted to DEP regarding this remediation are also available electronically at: https://eeaonline.eea.state.ma.us/portal#!/wastesite/1-0018869

Q57: Will information reporting be timely?

A57: Information will be reported as required by the MCP.

Q58: Will there be another public meeting?

A58: There are no further public meetings planned at time of this writing, but the Public Involvement Plan allows for more public meetings to be scheduled as necessary under the MCP to discuss further response actions being conducted at the site.

Q59: Can people continue to ask questions during the continuing phases of remediation?

A59: Petitioners and members of the public may contact Samuel R. Prickett, whose contact information has been provided in the PIP plan, with further questions regarding the environmental remediation and answers will be provided as required by the MCP.

Q60: When can people expect answers to their questions and questions of other petitioners?

A60: Petitioners and members of the public may contact Samuel R. Prickett, whose contact information has been provided in the PIP plan, with further questions regarding the environmental remediation and answers will be provided as required by the MCP. The timeline for answering questions will depend on the nature and extent of the question asked.

Important Information on
Trichloroethylene (TCE) in Workplace Indoor Air

March 2014

The purpose of this fact sheet is to provide information on TCE workplace exposures due to hazardous waste sites as the source of contamination and worker exposure. This information applies to workplaces that do not utilize TCE as part of its operations. OSHA standards cover workplaces that utilize TCE as part of its operations.

Why am I receiving this notice?
You are receiving this information because TCE has been measured in the air in your workplace at a level which exceeds MassDEP's "Imminent Hazard" concentration. An Imminent Hazard means that immediate action must be taken to reduce the exposure at the site because short-term exposure (five years or less) poses a risk of harm to human health.

- A TCE concentration above 24 micrograms per cubic meter ($\mu g/m^3$) in a typical workplace is identified as an Imminent Hazard for women who are or may be in the first 8 weeks of pregnancy, to ensure that measures are taken promptly to reduce the risk to the developing fetus. Developmental effects will not necessarily occur at exposures above this level, but they cannot be ruled out and steps to address the potential risk are required.
- A TCE concentration above 80 $\mu g/m^3$ is identified as an Imminent Hazard for everyone based on potential effects on the immune system from short-term (5 years or less) exposures. Immune system effects will not necessarily occur at exposures above this level, but they cannot be ruled out.

What is TCE? How might I be exposed?
TCE is a man-made, colorless liquid used mainly as a solvent to remove grease from metal parts. It has also been an ingredient in some consumer products such as glues and paint removers. When TCE is released to soil or groundwater as a result of spills or leaks at a facility, it can evaporate and enter into a building's indoor air through seams and cracks in building foundations. This process is called "vapor intrusion."

What is the safe level of TCE in the workplace?
The indoor air guideline for workplace settings is 8 $\mu g/m^3$. This value is based on the United States Environmental Protection Agency's (EPA's) guideline for continuous exposure, which has been adopted by MassDEP and adjusted for typical work hours. The value is based on a cautious interpretation of the data. At or below this level, there is no significant risk of health effects.

What are the possible health effects from indoor air TCE exposure?
The possible health effects from breathing TCE depend on the levels in indoor air, the length of exposure, and whether and when a pregnant woman is exposed. Women who are in the first 8 weeks of pregnancy are most sensitive to TCE exposures. TCE exposures may increase the risk of heart malformations in the developing fetus. Breathing TCE over a long period of time may affect the immune system and increase susceptibility to infections. Long-term exposures may increase an individual's risk of cancers of the kidney, liver and non-Hodgkin's lymphoma.

What should I know if I might be pregnant?
Because TCE exposure during the first 8 weeks of pregnancy could affect fetal heart development, pregnant women are of special concern. Where workplace indoor air TCE concentrations exceed 24 $\mu g/m^3$, MassDEP

requires immediate notification to workers and action to reduce concentrations to below 24 µg/m^3, or if feasible, eliminate the exposures.

For exposures during the first 8 weeks of pregnancy, MassDEP recommends the following protective measures:

- At TCE levels above 24 µg/m^3, women who may be in the first 8 weeks of pregnancy and are concerned about their risk may want to consult with their physician and/or an occupational doctor familiar with chemical exposures. Depending on the specific situation, there may be ways to minimize or eliminate the risk, for example by avoiding areas of the workplace with higher TCE levels if possible. TCE levels above 8 µg/m^3 and below 24 µg/m^3 present a low risk to the pregnant woman, but levels in this range must ultimately be reduced to meet EPA and MassDEP's indoor air guidelines.
- Levels above 60 µg/m^3 are of sufficient concern that MassDEP recommends that women who think they may be in the first 8 weeks of pregnancy consider taking immediate steps to reduce or eliminate exposure while mitigation measures are underway. For example, it may be possible to avoid areas of the workplace that have TCE levels above 60 µg/m^3 or temporarily relocate to a workspace with lower levels of TCE.

For exposures before or after the first eight weeks of pregnancy:

- Exposures that occurred two weeks or more before pregnancy do not contribute to risk since most TCE is eliminated from the body within several days.
- After the first 8 weeks of pregnancy, TCE does not present a risk to the developing fetal heart because it is fully formed, so the precautions suggested above would no longer be needed.

What measures might be taken to reduce TCE levels in my workplace?

Parties responsible for the contamination are required to contract environmental professionals to quickly take steps to reduce the indoor air levels. The first mitigation steps usually include sealing sumps and foundation cracks and increasing ventilation. Portable carbon filtration systems and changes to the heating and ventilation system may also help to temporarily reduce concentrations while more permanent measures are being designed and implemented. Installing a sub-slab depressurization (SSD) system can be an effective measure in the longer term. An SSD system, which is basically a radon abatement system, is a series of pipes under the basement with a fan that vents vapors to the outdoors. Groundwater treatment or soil vapor extraction may also be employed to reduce the source of TCE contamination.

What should I do if I'm concerned that my health has been affected?

If you have concerns about your health status, you should talk to your family doctor and/or an occupational doctor familiar with chemical exposures (see http://www.aoec.org/content/directory_MA.htm). When you meet with them, provide a copy of your TCE sampling results and this factsheet.

Where can my physician and I get more information about potential health effects?

More information on TCE health effects and the basis of the MassDEP guidance values can be found in "US EPA Trichloroethylene Toxicity Values and Office of Research and Standards Recommendations Regarding Remediation Targets and Timeframes to Address Potential Developmental Risks"and other information on MassDEP's website at http://www.mass.gov/eea/agencies/massdep/toxics/sources/chemical-research-and-standards.html.

Where can I get more information on TCE contamination and cleanup?

More information on MassDEP guidance for sites with TCE contamination can be found at http://www.mass.gov/eea/agencies/massdep/toxics/sources/chemical-research-and-standards.html or by contacting Paul Locke at MassDEP.

APPENDIX C

APPENDIX B

1.0 SUMMARY OF RESPONSE ACTIONS TO-DATE & RELEASE HISTORY

4.1 RTN 1-18869

In October 2011, Weston & Sampson Engineers, Inc. (W&S) prepared a Phase I Environmental Site Assessment (ESA) for the Franklin Regional Council of Governments (FRCOG). The ESA indicated that the site had been used for industrial purposes for over 100 years, but was vacant at that time. Past use of the facility was identified primarily as silverware manufacturing, but over the years included other products such as bicycle, car and airplane parts, surgical equipment, and military supplies. The Phase I ESA identified areas of Recognized Environmental Concern (RECs), which included the following:

- The site was historically used to manufacture silverware, hollowware, and tableware using high-powered machinery. Processes included cutting, stamping, degreasing, smelting, annealing, electroplating, buffing, and polishing, and utilizing raw hazardous chemicals, including TCE and petroleum products. These processes generated hazardous wastes, including waste silver cyanide, dry cyanide mixture, waste nitrating acid mixture, and nitric acid.
- There were abandoned chemical containers present throughout the building, the majority of which were unlabeled, improperly stored, and in poor condition.
- The site has been identified as a Resource Conservation and Recovery Act (RCRA) generator, and as potentially having a release of TCE. In addition, chlorinated solvents have been detected in groundwater at the site exceeding Reportable Concentrations per the Massachusetts Contingency Plan (MCP).
- There was a 30,000-gallon heating oil AST, age and condition unknown, present on site.
- There were four exterior cyclone units, which had been used to remove silver and other particulates from indoor air within the manufacturing area.
- ACM, lead-based paint, and PCBs were suspected to be present inside the buildings.

In May 2012, O'Reilly, Talbot & Okun Associates, Inc. (OTO) conducted a Phase II ESA at the Site. As part of the Phase II ESA, OTO advanced soil borings and installed monitoring wells; collected soil and groundwater samples; collected water samples from catch basins and storm drains; collected soil gas samples; and collected indoor air samples. Soil sample analytical results indicated elevated levels of volatile organic compounds (VOCs) [cis-1,2-dichloroethylene (c-1,2-DCE), TCE, and tetrachloroethylene (PCE)] and metals (arsenic, cadmium, chromium, copper, lead, nickel, and silver) above MCP Reportable Concentrations (RCS-1). Analytical results of the groundwater samples collected by OTO as part of the Phase II ESA indicated elevated levels of four VOCs (DCE, TCE, PCE, and vinyl chloride) above MCP RCGW- 2. Analytical results of the catch basin water samples indicated elevated levels of DCE, TCE, and PCE, with concentrations of TCE exceeding the MCP surface water benchmarks. Soil gas sample analytical results indicated elevated levels of TCE above the Massachusetts Department of Environmental Protection (MassDEP) Commercial/Industrial Sub-Slab Screening Values.

Indoor air samples indicated elevated levels of TCE and PCE above the MassDEP Commercial/Industrial Indoor Air Threshold Values.

In March 2013, OTO conducted additional investigation activities as part of the Phase II ESA. These activities included advancing soil borings and installing 17 additional monitoring wells; collecting 10 additional soil samples; conducting an elevation survey of new wells and existing catch basins; collecting groundwater samples from the 17 newly installed wells and eight existing wells; collecting water samples from six stormwater catch basins along Kenwood Street; and collecting sediment samples from the Kenwood Street catch basins. OTO reported analytical results were consistent with the known VOC contamination at the site.

The EPA performed pre-removal assessment between March and July 2014 and additional assessment both before and after soil excavation from May through August 2015. Analyses of shallow soils (the upper 0.5 feet) was performed throughout the Site. Analyses were performed for the VOCs TCE, tetrachloroethylene (PCE), lead, and arsenic using a mobile laboratory and off- Site laboratory following EPA protocols.

The EPA assessment included a soil sample (top six inches) from below a former cyclonic dust collector on the north side of Unit B1. This sample contained 860 mg/kg of silver. Following the EPA Removal Action in 2015, it was unclear whether soil had been removed from this location by EPA. As a result, in October, 2015 OTO performed a shallow grid soil sampling program of this area. The program included nine soil samples collected from the upper six inches of soil in a grid pattern around the former cyclonic dust collector. The former location was identified by the presence of the four concrete footings for the former dust collector. The soil samples were analyzed for antimony, arsenic, lead, silver and zinc.

In August, 2017 OTO performed soil explorations in advance of redevelopment activities at the Site. Previous Site redevelopment activities focused on interior building renovations, but the August 2017 explorations were performed prior to soil regrading and were incorporated into a RAM Plan to support the redevelopment. The explorations consisted of shallow hand auger samples from zero to two feet below grade and shallow borings to five feet. The soil samples were screened for VOCs and analyzed for the metal's antimony, arsenic, lead and silver.

The primary contaminants of concern (COCs) in Site soils were the metals antimony, arsenic, lead and silver, and the chlorinated solvent TCE. Most of the locations with elevated metals concentrations were located in shallow soils in five locations which were subsequently excavated.

Groundwater sampling was performed at the Site in 2012, 2013, 2016, 2018 and 2019. Each of these sampling rounds were performed by OTO using low flow sampling methods. The groundwater samples were analyzed for VOCs, petroleum hydrocarbons, dissolved metals and cyanide at Spectrum Analytical (now Eurofins Spectrum Analytical) and Contest Laboratory. OTO conducted assessment of potential off-Site VOC impacts in the residential neighborhood south of the Site in 2013. This entailed the installation of 17 additional monitoring in Davis

Street, Forest Street, and Kenwood Street. Each of these monitoring wells, along with a number of the on-Site monitoring wells were sampled in 2013.

In 2016, nine one-inch diameter shallow groundwater monitoring wells were installed by OTO in the basement of Unit B1 and sampled for VOCs. Groundwater from a sump in the northern basement of Unit B1 was also sampled. In 2018 and 2019, additional sampling and analysis for VOCs was performed on a series of monitoring wells on-Site and immediately downgradient in and adjacent to Kenwood Street.

First Quarter Sampling 2024

In January and February 2024, OTO collected samples of soil, groundwater, and catch basin stormwater, for analysis of CVOCs. The compound trichloroethylene (TCE) was detected by laboratory analysis at a concentration of 0.68 mg/kg in a sample of sediment/soil from catch basin CB-5N collected on February 5, 2024. The closest, but not directly applicable, standard for TCE is either the RCS-1 of 0.3 mg/kg or the S-3/GW-2 of 0.3 mg/kg. This result is similar to samples collected from CB-1S (0.35 mg/kg), CB-2N (0.6 mg/kg, and CB-3N (0.69 mg/kg).

Catch basin stormwater results were compared to the Surface Water Benchmark, which for TCE is 190 ug/L. Prior reports have noted groundwater at the Site discharges to this stormwater system which helps control the migration of VOC-impacted groundwater toward the south. It is therefore instructive to also compare the stormwater results to the GW-2 standard of 5 ug/L to note the levels of VOCs in groundwater discharging from the Site to the stormwater system. Only CB-2S (<1.0 ug/L), CB-3S (<1.0 ug/L), CB-5S (<1.0 ug/L), and CB-12 (<1.0 ug/L) were below the GW-2 standard. CB-1N (180 ug/L), CB-2N (1,100 ug/L), CB-3N (670 ug/L), CB-5N (190 ug/L) were close to or over the Surface Water Benchmark of 190 ug/L for TCE.

On February 12, 2024, OTO collected samples of catch basin sediment/soil from a down-stream side gradient catch basin identified as CB-6S and down-stream catch basin CB-7. Samples from CB-6S and CB-7 were submitted for analysis of chlorinated volatile organic compounds (CVOCs). Results published in July indicate that both samples contained low to non-detectable levels of CVOCs.

Soil samples collected from soil borings conducted in January indicate the presence of TCE in soil above the S-1/2/3 GW-2 standard of 0.3 mg/kg in soil boring MW-A between at least 18-30 feet below grade (b.g.) with the highest concentration of 110 mg/kg at 23-25 feet b.g. Both samples from MW-B were above this standard 3-5 ft. b.g. (24 mg/kg) and 8-10 ft. b.g. (0.5 mg/kg). At MW-C all four samples between 3-20 feet b.g. were above with the highest concentration of 260 mg/kg at 13-15 feet b.g. At MW-E the samples from 13-15 ft. b.g. (2.5 mg/kg) and 18-20 ft. b.g. ((2.3 mg/kg) were above the S-1/2/3 GW-2 standard of 0.3 mg/kg. Samples from MW-D/F/G/H/I were at or below detection limits for the laboratory.

Groundwater samples were collected from the new wells MW-A through MW-I, MW-6R (R for replacement of a previously destroyed well), LS-10R, LS-19, LS-21R, LS-22, LS-23, MW-101, MW-102R, MW-103, MW-104, MW-105R, MW-106, MW-107R, MW-109, and MW-116 by

OTO this round, including from the two deep wells MW-AD located at the former LS-24 which had been destroyed, and MW-ID located near the center of the south side of the ball fields along Kenwood Street. Groundwater from MW-AD (10,000 ug/L) exceeded the TCE GW-3 standard (5,000 ug/L). Groundwater from MW-A and MW-AD exceeded the GW-2 standards for TCE and PCE but the location is more than 30 horizontally from a current building so GW-2 does not currently apply. Groundwater from MW-B contained cis-1,2-Dichloroethylene (DCE; 37 ug/L) above the GW-2 standard of 20 ug/L and TCE (630 ug/L) above the GW-2 standard of 5 ug/L. Groundwater from MW-C contained PCE (300 ug/L) above the GW-2 standard of 20 ug/L and TCE (2,100 ug/L) above the GW-2 standard of 5 ug/L. LS-19 contained TCE (41,000 ug/L) above the GW-3 standard of 5,000 ug/L. Groundwater from MW-101 contained DCE (140 ug/L) above the GW-2 standard of 20 ug/L and TCE (3,300 ug/L) above the GW-2 standard of 5 ug/L. Groundwater from MW-E/F/G/I/ID/6R/102R/103/104/105R/106/107R/109/116, and LS-10R/21R/22/23 did not contain CVOCs above the applicable GW-2 or GW-3 or in most cases the laboratory detection limits.

These results indicate that the prior detection of TCE at LS-24 in the near surface groundwater in 2012 (17,200 ug.L) and 2013 (18,000 ug/L) has diminished as the MW-A near surface result is 61 ug/L. However, the MW-AD result for TCE of 10,000 ug/L indicates that the LS-24 TCE likely migrated downward to at least the screened interval of MW-AD (unknown as no boring logs were provided). There is only one deep monitoring well at the Site, so it is not yet known if this is the highest concentration or which direction, other than down, the CVOCs have migrated.

Second Quarter Sampling 2024

In May 2024, OTO collected samples of groundwater, stormwater and catch basin sediments for analysis of CVOCs. Groundwater laboratory results this round were mostly similar to the first quarterly results. Results differed at MW-AD where the TCE concentration dropped from 10,000 ug/L to 3,100 ug/L, and at MW-104 which rebounded from 94 ug/L to 33,000 ug/L to continue the wide vacillation of results over the past 11 years at this well. Groundwater laboratory results are summarized in the attached **Table 1** from OTO's July 2024 Notice of Environmental Sampling Results letter. Laboratory results for TCE are illustrated in the attached **Figure 5**.

The known extent of GW-2 exceedance in groundwater has not changed since this map was first published by OTO in 2023. The extent of migration of CVOCs in the stormwater system is now clearer, TCE extends to at least CB-3N, over 200 feet west of the Site. The extent of TCE at depth is not defined, with MW-AD as the only deep well at the Site.

Catch basin sediment laboratory results were all below applicable standards and mostly below laboratory reporting limits for CVOCs in this sampling round as summarized in the attached **Table 2** from OTO's July 2024 Notice of Environmental Sampling Results letter.

Stormwater laboratory results this round were similar to those in the first quarterly sampling and are summarized in the attached **Table 3** from OTO's July 2024 Notice of Environmental Sampling Results letter.

2.0 SITE HYDROGEOLOGICAL CHARACTERISTICS

OTO reports that soils in the Site vicinity are mapped as fine glaciolacustrine deposits over till. In soil borings and excavations, OTO encountered two to seven feet of fill, followed by silty sand or clayey silt, followed by two to five feet of glacial till over bedrock. Mapped bedrock outcrops are located approximately 500 feet southeast of the Site. Shallow bedrock has also been reported at the gasoline station across Federal Street, immediately east of the Site. Bedrock in the area is mapped as arkose sandstone interbedded with siltstone.

Review of the boring/monitoring well installation logs (OTO 2020 Phase II, Appendix F) indicate bedrock is likely at depths of five to ten feet (LS-18, LS-20 and MW-101) in the eastern portion of the Site, but drops to depths of approximately 30 feet below ground surface towards the west (monitoring wells MW-102, 103, 104, 105, 106, 109, 110, 111, 112, 113, and 114 hit no refusal to 30 feet below ground surface, while monitoring wells MW-107 108 on Kenwood and MW-115 and 116 on Forest Ave hit refusal, likely on bedrock, at depths of approximately 25 feet below ground surface).

The new well (2024) MW-AD was drilled to a depth of approximately 45 feet b.g., is the deepest on-Site monitoring well, but no boring log for this well has been published yet.

Groundwater was observed at depths of two to five feet across the Site. Based on Figure 3 from the *Phase II & RAM Completion Report* (OTO, 2020), groundwater flows to the southwest across the Site toward the Green River. The Green River runs south along the west side of Greenfield, then along the south side of Greenfield to join the Connecticut River southeast of town.

Groundwater from the Site discharges into the leaky storm drain sewer lines along Kenwood Street which eventually discharges into the Green River southwest of the Site (see attached **Figure 6** from OTO's July 2024 Notice of Environmental Sampling Results letter.). CVOCs have been detected in storm water collected in catch basins along the north side of Kenwood Street. While CVOCs have not been detected at the Green River outfall, this is an unpermitted/uncontrolled discharge of CVOCs from the Site into the storm sewer. It is not known if the CVOCs simply evaporate and dissipate into the air along Kenwood Street or if they leak back into groundwater further along the sewer.

3.0 Nature and Extent of the Release

The contaminants of concern (COCs) at the Site are metals antimony, arsenic, lead and silver in soil, and the chlorinated solvents TCE/PCE/DCE in soil, groundwater, and potentially indoor air. No significant concentrations of petroleum hydrocarbons have been detected in Site media.

3.1 Soil

Metals are relatively insoluble as shown by the lack of detection of dissolved metals concentrations in Site groundwater. Metals in soils do not degrade over time. The potential transport mechanism for the metals in soil would be physical movement through excavation. TCE in soil and groundwater is not expected to degrade significantly over time absent remedial efforts to encourage in-situ degradation.

Elevated concentrations of CVOCs remain in soil following the EPA excavations at the west grid and south grid areas. These two areas were excavated to depths of between two and four feet below grade by EPA in 2015.

- The average concentration for TCE in the soils from two to three feet below grade at the base of the western grid excavation location is approximately 3,000 ug/kg, approximately 10 times the Method 1 S-1 and S-2/GW-2 standard of 300 ug/kg; and
- The post excavation average concentration for TCE at the base of the southern grid excavation, from two to four feet below grade is approximately 8,000 ug/kg, over twenty times the Method 1 S-1 and S-2/GW-2 standard of 300 ug/kg.

Soils downgradient of the west grid excavation within the groundwater table (locations LS-14, LS-17, LS-19, MW-104 and MW-105) from depths of six to 12 feet below grade also contained TCE at concentrations above the Method 1 standards.

Based on the results of shallow soil sampling (either 0-0.5 feet or 0-1 feet) performed by EPA and OTO, OTO does not believe that there are Site soils within the upper one foot which are impacted with CVOCs remaining at the Site. CVOC impacted soils remain at depths of two to four feet at the two excavated areas.

3.2 Groundwater & Stormwater

Elevated concentrations of CVOCs were detected in Site groundwater, sourced from the west grid and south grid excavation areas. Concentrations of the principle CVOC (which is TCE) in groundwater downgradient of these two areas are above the Method 1 GW-2 standard and in some cases above the GW-3 standard. CVOCs present at lower concentrations in groundwater include tetrachloroethylene (PCE), cis-1,2- Dichloroethylene (DCE), and vinyl chloride. Groundwater below Unit B1 in eight of the nine ("LWP") monitoring wells installed below this

building exceeded the GW-2 standard. The estimated lateral extent of the CVOC plume with TCE concentrations in groundwater at or potentially above the Method 1 GW-2 standard is shown on **Figure 5**. This plume is intercepted by the storm sewer system in Kenwood Street. Impacted groundwater emanating from the south grid excavation area is also intercepted by the storm water system. Groundwater from the Site that discharges into the leaky storm drain sewer lines along Kenwood Street eventually discharges into the Green River southwest of the Site (see attached **Figure 6** from OTO's July 2024 Notice of Environmental Sampling Results letter.). CVOCs have been detected in storm water collected in catch basins along the north side of Kenwood Street. While CVOCs have not been detected at the Green River outfall, this is an unpermitted discharge of CVOCs from the Site into the storm sewer. The Site is not located in a current or potential drinking water source area (**Figure 4**).

3.3 Indoor Air

The primary exposure route of concern is intrusion of vapors volatilizing from groundwater into buildings. Assessments by MassDEP and EPA have not identified evidence of significant vapor intrusion related to the Disposal Site at downgradient residential properties. The vapor intrusion exposure pathway at the Site has been eliminated [greatly reduced] through installation of the Passive Exposure Pathway Mitigation Measures (PEPMM) within Site buildings (OTO, 2020). Indoor air sampling was most recently conducted in on-Site buildings in 2022 and at select off-Site properties in 2023.

3.4 Migration Pathways

Migration pathways for COCs at the Site are horizontal groundwater migration primarily of TCE potentially following utility lines, vertical migration of CVOCs through the water table to a confining layer, and vapor intrusion of the vapor phase of CVOCs into buildings. These pathways have been evaluated through groundwater sampling, storm sewer sampling and the sampling program performed in the residential neighborhood south of the Site. OTO indicates off-Site migration of DNAPL is expected to be limited by the presence of glacial till over bedrock, which has been found to be at least five feet thick (monitoring wells MW-115 and MW-116).

It is not known if the CVOCs simply evaporate and dissipate into the air along Kenwood Street or if they leak back into groundwater further along the sewer. It is also not clear if a DNAPL portion of the CVOC plume migrates under Kenwood Street. While there is no evidence of this to date, it has not been demonstrated that deep wells exist at the downgradient portions of the Site, that the bedrock contours are known, or that the till/bedrock is an effective confining layer at this Site. Since CVOCs can have a DNAPL phase, these are important questions to answer. Groundwater results from MW-AD answered one important question (are there CVOCs at depth?) and thereby posed several new ones (what is the extent and which direction of migration if any?).

APPENDIX D

APPENDIX E

APPENDIX F

APPENDIX G

APPENDIX H

Former Lunt Silversmith PIP email List

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