



October 28, 2016

Mr. Hans Jensen
Strategic Planning and Community Development
City of Somerville
93 Highland Avenue
Somerville, Massachusetts 02143

Subject: Response to Comments
Peer Review Status Report #2
343-349 and 351 Summer Street
Somerville, Massachusetts

Dear Mr. Jensen:

On behalf of The Maggiore Companies (Owner), EnviroTrac Ltd. (EnviroTrac) has prepared this brief response to the comments presented in Peer Review Status Report #2, prepared by Nangle Consulting Associates, Inc. (NCA), relative to our Draft Limited Subsurface Investigation Report for the properties identified as 343-349 and 351 Summer Street in Somerville, Massachusetts (Subject Property).

For ease of review, our response to comments are numbered in the same fashion as the comments presented in the NCA letter:

EnviroTrac Conclusions #5 and #6

We agree that the elevated PAH present in UST soil samples S-1, S-3 and S-5 are not consistent with the chemical signature of the oil release, as represented by the results of laboratory analysis of the stockpile soil sample. However, it is our opinion that evidence of conditions which might lead to a reporting exemption under the MCP are not present. No asphalt, coal, coal ash or wood ash were observed in the soil samples collected. The asphalt fragments observed at other locations on the site were present in soil samples collected at approximately 3 feet below grade. The highest PAH concentrations in the soil samples from the UST excavation were observed in sample S-3, collected at 8.5 feet below grade. At this time, we do not believe that the additional time and expense to conduct additional investigations is warranted.

EnviroTrac Conclusion #7

The composite soil samples collected from B-101, B-102 and B-104 were collected solely to provide preliminary data to assist the developer in estimating the cost of disposal for soil requiring export from the site. As you correctly pointed out, it is not only common industry practice to composite soil samples for disposal characterization, but it is required by many disposal facilities. While the observation of asphalt in B-101

and B-102 would explain the presence of PAH in soil, it would not explain the presence of elevated lead concentrations.

In our opinion, the presence of two slightly different analytical results for benzo(a)pyrene (BaP) using two analytical methods run on a composite sample does not indicate a concern for the representativeness of the sampling or analytical methodology. Given the variables associated with collecting, processing and analyzing a composite soil sample, results as similar as 1.9 and 2.7 mg/kg are remarkably similar. As stated above, we do not believe that the additional time and expense to conduct additional investigations into this issue is warranted.

EnviroTrac Conclusion #8

At this time, the Owner intends to notify MassDEP of the reportable conditions at the site in accordance with the requirements of the Massachusetts Contingency Plan (MCP). Furthermore, the owner is of the opinion that managing site soil under the requirements of the MCP will provide all project stakeholders and interested parties with a transparent view of the development activities and ensure that human health, public health, safety and the environmental are protected to the highest standards.

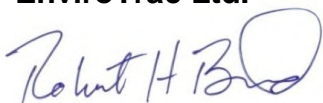
EnviroTrac Conclusion #9

We agree that interpretation of the water table elevation contours does not yield a consistent groundwater flow direction and gradient. We also agree that for the purposes of the investigation, the groundwater laboratory analytical program has adequately characterized site groundwater quality and supports the conclusion that no groundwater condition reportable to Mass DEP exists.

We very much appreciate the attention to detail and thoughtfulness of the comments provided by NCA on this project. At this time, the Owner intends to report the site to MassDEP and conduct all soil management in accordance with the requirements of the MCP. As such, we are of the opinion that Conditions 39 through 42 of the ZBA Decision have been met and respectfully request your acknowledgement of same. All future activities will be conducted in accordance with the requirements of Condition 43 until a Permanent Solution has been filed with MassDEP for the Disposal site.

Please do not hesitate to contact the undersigned with any questions or comments.

Sincerely,
EnviroTrac Ltd.



Robert H. Bird, LSP
Principal Hydrogeologist

Copy: Matthew Maggiore
Paul Maggiore