

MEMORANDUM

TO: Robert H. Bird, L.S.P. (EnviroTrac Ltd.)

FROM: Jeffrey A. Nangle, P.E., L.S.P

DATE: September 16, 2016

SUBJECT: Limited Subsurface Investigation
343-351 Summer Street

Before we prepare our final peer review comments for the Limited Subsurface Investigation Report, we would like to follow up on a few issues for your review and consideration.

1. The 0-10 foot composite sample from B-102 where a lead concentration of 400 mg/kg was detected contains asphalt within the 2.7 - 3.3 depth interval. As the sample hold time has not been exceeded, do you still have soil samples in-house for the 0-5 and 5-10 foot depth intervals that could be run to isolate this potential reportable condition? In addition, is it planned to do TCLP analyses for the sample containing the lead exceedance for purposes of evaluating future soil management requirements?
2. Sample S-3 contained several Polynuclear Aromatic Hydrocarbons (PAHs) above their respective Reportable Concentration (RC) values, and Massachusetts Department of Environmental Protection's (MDEP's) background standards. We understand that averaging the data could meet the requirements of a Permanent Solution for the petroleum release conditions; however, the PAH distribution detected in sample S-3 differs from what was observed in the stockpile sample associated with the spill. Further, several of the PAHs detected in sample S-3 and not in the stockpile would not be expected in a waste oil sample, nor were they detected at the additional seven (7) sampling locations (S series) above applicable RC values. Accordingly, we would appreciate clarification regarding the opinion that these exceedances are addressed by the two (2) hour notification.
3. Is it correct to assume that the sample from 13 feet at B-103 was analyzed in anticipation that this depth corresponded to the soil / groundwater interface, which was later determined to be at 16.81 feet after well stabilization? Similar consideration applies to the sampling depths for MW-105 and MW-108.
4. It is noted that the Semi-Volatile analyses of the 0-10 foot composite sample from B-104 did not detect Benzo(a)pyrene above the applicable RC value, while the Extractable Petroleum Hydrocarbons (EPH) analysis did reveal a slight exceedance. As the sample hold time has passed and several additional sample analyses were below

Memorandum
September 16, 2016
Page 2 of 2

the RC value, is it planned to reevaluate this location to confirm the repeatability and representativeness of the single exceedance?