

PUBLIC INVOLVEMENT PLAN

FORMER BOSSI'S SERVICE STATION RTN 3-18598 12 SWANTON STREET WINCHESTER, MA 01890

Prepared for:

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PIP Former Bossi's Service Station 12 Swanton Street Winchester, MA 01890 RTN 3-18598 08/05/13 Page 2

TABLE OF CONTENTS

Section		Page
1.0	Introduction	4
2.0	Site Background	5
2.1	Regulatory History	6
2.2	IRA Activities	7
2.2.	1 Sampling and Disposal of Stockpiled Soil	7
2.2.	2 Subsurface Exploration Activities	8
2.2.	3 Ground Water Monitoring Well Installation and Sampling	8
3.0	Site Geology	8
3.1	Regional Hydrogeology	9
3.2	Site Hydrogeology	9
3.3	Soil Analytical Results	9
3.3.	1 VPH Fractions	10
3.3.	2 VPH Target Analytes	10
3.3.	3 EPH Fractions	10
3.3.	4 EPH Target Analytes	11
3.4	2000 Ground Water Analytical Results	11
3.4.	1 VPH Fractions	11
3.4.	2 VPH Target Analytes	11
3.4.	3 EPH Fractions	12
3.4.	4 EPH Target Analytes	12
3.5	Post 2005 RAO Ground Water Monitoring	12
4.0	July 2007 Soil Gas Survey	14
4.1	Soil Gas Survey – Northern Property Boundary	14
4.2	Soil Gas Survey – Western Property Boundary	15
4.3	Soil Gas Point SG-25	15
4.3.	1 APH Analytical Results	16
5.0	Public Involvement History	17
6.0	Addressing Public Concerns	17
7.0	Public Involvement Activities	18
7.1	Informing The Public	19
7.1.	1 Information Repositories	19
7.1.	2 Site Mailing List	20



PIP Former Bossi's Service Station 12 Swanton Street Winchester, MA 01890 RTN 3-18598 08/05/13 Page 3

TABLE OF CONTENTS (Continued)

Section	Page
7.1.3 Notification to Local Officials and Residents of Major Milestones and Events	21
7.2 Soliciting Public Input	21
7.2.1 Public Comment Periods	22
7.2.2 Response to Comments	22
7.2.3 Public Meetings	22
8.0 Schedule For Public Involvement Activities	23
9.0 Responsibility For Implementing The Public Involvement Plan	23
10.0 Revisions To This Plan	24

Tables

Table 1 - Soil Analytical ResultsTable 2 - Ground Water Analytical Results

Figures

Figure 1 - Site Locus Figure 2 - Site Plan

Appendices

Exhibit I - Response to Petitioner Comments Exhibit II - PIP Schedule Appendix I - List of Petitioners Appendix II - Documents on File at Winchester Library Repository Appendix III - Dissolved Concentration vs. Time Plots for Individual Monitoring Wells



1.0 Introduction

On or about May 13, 2013, the Bossi Realty Trust received a petition requesting that the Former Bossi's Service Station disposal site be designated as a Public Involvement Plan (PIP) site, under Section 14 (b) of Massachusetts General Laws chapter 21E (M.G.L. c. 21E), the State "Superfund" Law. On May ???, 2013 the Bossi Realty Trust officially accepted the designation of the Former Bossi's Service Station disposal site as a PIP site, requiring the preparation and implementation of a Public Involvement Plan.

This Plan has been prepared by the Bossi Realty Trust in accordance with the requirements of the Massachusetts Contingency Plan (MCP), 310 CMR 40.00. The Former Bossi's Service Station disposal site is a Tier II site. The MassDEP has assigned responsibility for conducting both technical and public involvement activities at the Former Bossi's Service Station disposal site to the Bossi Realty Trust. Sites which are tier classified are subject to all of the requirements in M.G.L. c. 21E and the MCP, including public involvement. The MassDEP retains the authority to ensure that public involvement activities are conducted in accordance with state law and regulations.

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 contamination;
- risk posed by the site;
- whether cleanup actions are necessary and if necessary,
- determining and implementing the most appropriate actions.

In addition, the remedial response action process provides opportunities for public involvement throughout the process. The remedial response action processes established by the MCP. 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 disposal sites at which the public indicates interest in becoming involved in this process, DEP designates the site as a PIP site, and requires the preparation of a plan which identifies specific activities that will be undertaken to address public concerns to the extent possible. Due to public concerns about the Former Bossi's Service Station disposal site, MassDEP has designated the site a PIP site, pursuant to the MCP.

This Draft Public Involvement Plan was prepared on behalf of the Bossi Realty Trust and was presented at a public meeting at the Winchester MA Public Library Large Meeting Room on July



3, 2013. The DRAFT PIP was provided at the Winchester Public Library Repository and on the dedicated Bossi PIP webpage for review. The 30 day public comment period was extended by one full week based on a request from Mr. Randell Drane, the key petitioner. The key petitioner submitted public comments by the close of the extended public comment period on July 29, 2013. The Final PIP has incorporated these comments which have been responded to in Appendix I.

The (PRP) will implement public involvement activities in accordance with the Public Involvement Plan for the Former Bossi's Service Station disposal located at 12 Swanton Street, Winchester, MA. Section 2 contains background information on the site; including site, environmental assessment, and public involvement histories. Section 3 explains how the remedial response action process addresses community concerns which have been raised during the development of the Plan. Section 4 explains the proposed public involvement activities. Section 5 contains a schedule for public involvement activities. Section 6 outlines the roles and responsibilities of those involved in implementing the Public Involvement Plan. It also explains the procedures MassDEP will use to address situations in which the agency receives complaints about the manner in which the Plan is being implemented. Section 7 describes how the Plan will be revised in the future.

2.0 Site Background

The site is located at 12 Swanton Street in Winchester, MA (UTM coordinates 4702910 mN, 324875 mE (Figure 1). The site is currently occupied by an automotive repair and used car sales facility. The site formerly dispensed gasoline and diesel fuel. The property consists of a 1,806 square foot building on a 0.31-acre lot (1) (Figure 2). The site is entirely asphalt paved except for landscaped islands located in the northeast and southwest of the property and a smaller landscaped island located in the northwest of the site. The site building is connected to municipal water and sanitary sewer. Nearby residents are also on the municipal water and sanitary system (2).

The site is located at an elevation of approximately 49 feet above Mean Sea Level (based upon the National Geodetic Vertical Datum of 1929). The topography is relatively flat with a mild grade from east to west. Regionally, the topography to the east rises sharply in elevation culminating in the Middlesex Fells Reservation located approximately 1,224 feet east of the site. The area to the west slopes gently to the Aberjona River approximately 2,021 feet west of the site (Figure 1).

In May 1999, six (6) underground storage tanks (USTs) were removed from the site under a permit issued by the Winchester Fire Department. The USTs consisted of three (3) gasoline USTs (4,000-gallon, 3,000-gallon, and 2,000-gallon), one (1) 3,000-gallon diesel UST, one (1) 500-gallon waste oil UST and one (1) 500-gallon heating oil UST.



On July 8, 1999, the MADEP Northeast Regional Office was notified of a 72-hour reportable condition at the site when a soil headspace reading exceeding 100 parts per million (ppm) was obtained from soil samples collected from within 10 feet of an underground storage tank (UST) outer wall. Approximately 20 cubic yards of soil were stockpiled when the six (6) USTs were removed from the site in May 1999. The four (4) gasoline USTs, the dispensing island, and the single 250-gallon waste oil UST were located in front of the site building (Figure 2). The 500-gallon heating oil UST was located at the rear of the building. The MADEP issued a Notice of Responsibility (NOR) dated November 19, 1999 to Bossi Realty Trust for a gasoline release associated with the UST system.

2.1 Regulatory History

The following is an annotated regulatory site history:

• On July 8, 1999, a release of petroleum was identified at the property based on elevated PID readings obtained from soils stockpiled at the site. The soil stockpile had been generated from the removal of six (6) USTs in May of 1999.

• On September 5, 1999, oral notification was provided to the MADEP by Subsurface Remediation Technologies, Inc. (SRT). The MADEP assigned Release Tracking Number (RTN) 3-18598. The MADEP issued a Notice of Responsibility to Bossi Realty Trust on November 19, 1999.

• On November 7, 2000, the MADEP issued a Notice of Noncompliance (NON) to Bossi Realty Trust for failure to submit a Release Notification Form (RNF), an Immediate Response Action (IRA) Status Report, and a Response Action Outcome (RAO) Statement or Tier Classification.

• On December 18, 2000, Bossi Realty Trust submitted an RNF and an IRA Plan in accordance with 310 CMR 40.0330 and 40.0424.

• On April 4, 2001, Bossi Realty Trust submitted an IRA Completion Statement, Phase I Initial Site Investigation Report, and Tier 2 Classification based on a Numerical Ranking Scoresheet total of 138 in accordance with 310 CMR 40.0427, 40.0480, and 40.0500.

• On May 24, 2004, the MADEP issued a Notice of NON for failure to complete and file a Phase II Report, a Phase III Remedial Action Plan and a Phase IV Plan within three years of the Tier II Classification.



• On January 24, 2005, REMSERV, Inc. submitted a Phase II Scope of Work along with a schedule for implementing the Phase II, the Phase III Feasibility Analysis, the Phase IV Remedial Implementation Plan and the Phase IV Completion Statement for achieving a Remedy Operation Status or Response Action Outcome.

• On March 14, 2005, the MADEP issued an Administrative Consent Order & Penalty (ACOP) (ACOP-NE-04-3A027) due to prior violations and the failure to submit a Phase II Report, a Phase III Remedial Action Plan, and/or a Phase IV Remedy Implementation Plan by required deadlines.

• On May 6, 2005 Bossi Realty Trust submitted a Phase II Comprehensive Site Assessment Completion Statement.

• On July 11, 2005 Bossi Realty Trust submitted a Phase III Remedial Action Plan.

• On August 16, 2007 Bossi Realty Trust submitted a Phase IV Remedy Implementation Plan.

• On June 26, 2012 Bossi Realty Trust submitted a Class C-2 Response Action Outcome and Tier II Extension.

• On June 27, 2013 Bossi Realty Trust submitted a Post Class C-2 Response Action Outcome Status Report and a Tier II Extension.

2.2 IRA Activities

In 2000, Subsurface Remedial Technologies (SRT) and Web Engineering Associates, Inc. (Web) undertook Immediate Response Action (IRA) activities to address the impacts to site soil and ground water from the petroleum release. The IRA activities consisted of the off-site recycling of the soil stockpile as well as assessment of the extent of gasoline contaminated soils and ground water at the property.

2.2.1 Sampling and Disposal of Stockpiled Soil

The UST excavation generated approximately 20 cubic yards of contaminated soil, which was stockpiled on site. On December 18, 2000 SRT collected a composite sample from the stockpile for laboratory analysis according to the soil disposal parameters of Aggregate Industries (AI) in Stoughton, MA. Based on the laboratory analytical results, the soils were transported to AI for asphalt batch recycling March 29, 2001 under a MADEP Bill of Lading (BOL).



2.2.2 Subsurface Exploration Activities

On October 13, 2000, Web observed the advancement of four (4) soil borings at the site by Soil Exploration of Leominster, MA. The borings were completed at depths ranging from 16 to 19 feet, approximately five (5) to eight (8) feet below the water table. Soil samples were screened with a photoionization detector (PID) using the jar headspace method (5). One (1) soil sample from each boring was submitted to Groundwater Analytical in Buzzards Bay, MA (GWA) for laboratory analysis according to the MADEP Volatile Petroleum Hydrocarbon (VPH) and Extractable Petroleum Hydrocarbons (EPH) analytical methods. The soil sample from soil boring MW-2 (10-12 feet) was analyzed for EPH only.

On February 28, 2005, Expedition Drilling of Atkinson, NH completed six (6) soil borings (B101, B102, B102A, B102B, B103, and B104) at the site to further assess the extent of petroleum impacted soils and to assess the current ground water conditions (Figure 2). The borings were advanced using a Mobile B53 ATV equipped with a 4¼-inch hollow stem auger and a 1 7/8-inch spilt spoon sampler. Samples were collected using a two-foot long split-spoon sampler driven by a 140 lb. hammer. Soil borings B101, B102B, B103, and B104 were completed as ground water monitoring wells constructed of 2-inch diameter Schedule 40 PVC pipe with a 0.01-inch slot screened section (Figure 2).

2.2.3 Ground Water Monitoring Well Installation and Sampling

Four (4) soil borings advanced on October 13, 2000 were completed as ground water monitoring wells (MW-1 through MW-4). On October 24, 2000, Web collected ground water samples from MW-1, MW-3 and MW-4. Web did not sample monitoring well MW-2 as a tow truck destroyed the monitoring well prior to sampling. Web used an oil/water interface probe to gauge water levels and check for the presence of Light Non-Aqueous Phase Liquid (LNAPL) in the wells. Web did not identify LNAPL in any of the wells during the October 24, 2000 ground water monitoring event. Web submitted three (3) ground water samples to Groundwater Analytical of Buzzard's Bay, MA for laboratory analysis according to the MADEP VPH and EPH Methods.

3.0 Site Geology

Based on the Webb Engineering and REMSERV, Inc. observations, the site geology from ground surface ranges from coarse to fine sand to silty fine sand with some to little silt, some to little gravel, and little to trace clay. The Webb site investigation characterized the site soils as silty fine sand and gravel fill to depths of approximately six (6) to eight (8) feet overlying dense glacial till (6). REMSERV, Inc. observed a layer of tan medium to fine sand with little silt and little coarse sand from five (5) to 10 feet in B101. The same soil type exhibited little gravel and trace clay at a depth of eight (8) to 10 feet in this boring. Soils below 13 feet in all REMSERV, Inc. borings consisted of brown to black coarse to fine sand and silty sand with little to trace clay and some to trace gravel.



3.1 Regional Hydrogeology

The site is located in the Mystic River Drainage Basin (8). Three (3) water supply reservoirs that service the Town of Winchester within a mile east of the site are topographically and hydrogeologically upgradient of the site. Storm water from the site is drained through catch basins located on Swanton Street, which discharge to the Aberjona River located west of the site.

3.2 Site Hydrogeology

The depth to ground water within the disposal site was gauged between 11.83 feet and 13.08 feet below ground surface during the August 10, 2007 ground water monitoring event. REMSERV, Inc. contoured water table elevations from the August 10, 2007 event to approximate the slope of the water table surface and the direction of ground water flow. The water table slopes to the northwest at a gradient of approximately 0.0101 foot/foot (Figure 2).

Hydraulic conductivity testing was not conducted as part of the Phase II Scope of Work but published values for coarse to fine sand aquifers are approximately 2.84 ft. /day (9).

$V_s = \underline{K_h}dh$	where;	
$\eta_e dI$		
	V_s = seepage velocity	
	K_h = horizontal hydraulic	conductivity = 2.84 ft/day
	η_e = effective porosity	= 0.25
	dh/dl = hydraulic gradient	= 0.0101 foot/foot

REMSERV, Inc. calculated an approximate ground water flow velocity of 0.115 ft. /day or 41.98 ft. /year.

3.3 Soil Analytical Results

Web submitted three (3) soil samples collected from 10 to 12 feet bgs (MW-1 (10'-12'), MW-2 (10'-12'), and MW-3 (10'-12')), and one soil sample collected from greater than 15 feet bgs (MW-4 (15'-15.5')). The samples were analyzed according to the MassDEP volatile petroleum hydrocarbon (VPH) analysis according to the MassDEP methodology and procedures. REMSERV submitted four (4) soil samples for VPH and extractable petroleum hydrocarbon (EPH) analysis according to the MassDEP methodology and procedures



3.3.1 VPH Fractions

- C5-C8 aliphatics were identified in soil samples MW-3 (10'-12') and MW-4 (15'-15.5') at concentrations of 2 mg/kg and 2,100 mg/kg, respectively, B101 S4 13-15 (16.4 mg/kg), B103 S1 13-15 (639 mg/kg), and B104 S1 13-15 (1,130 mg/kg);;
- C9-C12 aliphatics were identified in MW-1 (10'-12') and MW-3 (10'-12') at concentrations of 1.9 mg/kg and 2.2 mg/kg, respectively, C9-C12 aliphatics were identified in soil samples B101 S4 13-15 (6.08 mg/kg), B103 S1 13-15 (217 mg/kg), and B104 S1 13-15 (350 mg/kg); and
- C9-C10 aromatics were identified in soil samples MW-3 (10'-12') and MW-4 (15'-15.5') at concentrations of 1.4 mg/kg and 2,400 mg/kg, respectively, C9-C10 aromatics were identified in soil samples B101 S4 13-15 (8.66 mg/kg), B103 S1 13-15 (280 mg/kg), and B104 S1 13-15 (216 mg/kg).

No VPH fractions were identified in any other soil samples at concentrations exceeding laboratory minimum detection limits (Table 1).

3.3.2 VPH Target Analytes

- Benzene was identified in soil sample B103 S1 13-15 at a concentration of 1.75 mg/kg;
- Toluene was identified in soil sample MW-4 (15'-15.5') at a concentration of 470 mg/kg, B101 S4 13-15 (0.14 mg/kg), B103 S1 13-15 (39.6 mg/kg), and B104 S1 13-15 (5.99 mg/kg);
- Ethylbenzene was identified in soil sample MW-4 (15'-15.5') at a concentration of 170 mg/kg),
- B103 S1 13-15 (24.2 mg/kg) and B104 S1 13-15 (2.72 mg/kg);
- Total xylenes were identified in soil sample MW-4 (15'-15.5') at a concentration of 880 mg/kg, B103 S1 13-15 (127.8 mg/kg) and B104 S1 13-15 (11.72 mg/kg);
- Naphthalene was identified in soil sample MW-4 (15'-15.5') at a concentration of 60 mg/kg;
- Naphthalene was identified in soil samples B101 S4 13-15 (0.332 mg/kg), B103 S1 13-15 (9.55 mg/kg), and B104 S1 13-15 (5.82 mg/kg); and
- Methyl tert-butyl ether (MTBE) was identified in soil sample MW-4 (15'-15.5') at a concentration of 10 mg/kg.

No other VPH target analytes were identified in any other soil samples at concentrations exceeding laboratory minimum detection limits (Table 1).

3.3.3 EPH Fractions

• C9-C18 aliphatics were identified in soil sample MW-4 (15'-15.5') at a concentration of 350 mg/kg; and



• C11-C22 aromatics were identified in soil sample MW-4 (15'-15.5') at a concentration of 120 mg/kg.

No other EPH fractions were identified at concentrations exceeding laboratory minimum detection limits (Table 1).

3.3.4 EPH Target Analytes

- 2-methylnaphthalene was identified in soil sample MW-4 (15'-15.5') at a concentration of 26 mg/kg; and
- Naphthalene was identified in soil sample MW-4 (15'-15.5') at a concentration of 29 mg/kg.

No other EPH target analytes were identified at concentrations exceeding laboratory minimum detection limits.

3.4 2000 Ground Water Analytical Results

On October 24, 2000, Web collected three ground water samples for laboratory analysis according to the MADEP VPH and EPH Methods. The results of the laboratory analysis are summarized in Table 2 and the analytical data sheets are attached as Appendix III.

3.4.1 VPH Fractions

- C5-C8 aliphatics were identified in monitoring wells MW-1 (1,400 ug/L), MW-3 (30,000 ug/L), and MW-4 (2,440 ug/L);
- C9-C12 aliphatics were identified in monitoring wells MW-1 (340 ug/L), MW-3 (21,000 ug/L), and MW-4 (5,450 ug/L); and
- C9-C10 aromatics were identified in monitoring wells MW-1 (440 ug/L), MW-3 (17,000 ug/L), and MW-4 (10,700 ug/L).

3.4.2 VPH Target Analytes

- Benzene was identified in monitoring wells MW-1 (11 ug/L), MW-3 (1,900 ug/L), and MW-4 (1,900 ug/L);
- Toluene was identified in monitoring wells MW-1 (40 ug/L), MW-3 (23,000 ug/L), and MW-4 (41,000 ug/L);
- Ethylbenzene was identified in monitoring wells MW-1 (37 ug/L), MW-3 (4,500 ug/L), and MW-4 (6,200 ug/L);



- Total xylenes were identified in monitoring wells MW-1 (138 ug/L), MW-3 (24,200 ug/L), and MW-4 (8,030 ug/L);
- Naphthalene was identified in monitoring wells MW-3 (830 ug/L) and MW-4 (1,100 ug/L); and
- MTBE was identified in monitoring wells MW-1 (16 ug/L) and MW-4 (3,500 ug/L).

No other VPH target analytes were identified in ground water at concentrations exceeding laboratory minimum detection limits (Table 2).

3.4.3 EPH Fractions

- C9-C18 aliphatics were identified in monitoring wells MW-3 (1,500 ug/L) and MW-4 (1,300 ug/L); and
- C11-C22 aromatics were identified in monitoring wells MW-3 (630 ug/L) and MW-4 (800 ug/L).

No other EPH fractions were identified at concentrations exceeding laboratory minimum detection limits (Table 2).

3.4.4 EPH Target Analytes

- 2-methylnaphthalene was identified in monitoring wells MW-1 (1.4 ug/L), MW-3 (140 ug/L), and MW-4 (170 ug/L);
- Fluorene was identified in monitoring wells MW-3 (1.4 ug/L), and MW-4 (1.3 ug/L);
- Phenanthrene was identified in monitoring wells MW-3 (1.1 ug/L), and MW-4 (1.7 ug/L); and
- Naphthalene was identified in monitoring wells MW-1 (2.3 ug/L), MW-3 (170 ug/L), and MW-4 (280 ug/L).

No other EPH Target Analytes were identified at concentrations exceeding laboratory minimum detection limits (Table 2).

3.5 Post 2005 RAO Ground Water Monitoring

Ground water monitoring has been conducted since 2005 on a semi-annual basis. Since 2005, 18 ground water sampling events have been conducted. Ground water samples from all 18 events were submitted for VPH analysis. The post 2006 sampling events did not include the analysis of ground water samples for EPH fractions and target analytes.

Dissolved contaminant trends have been plotted versus time. The Plots are provided in Appendix IV.

Upgradient Monitoring Well – MW-1



Monitoring well MW-1 is located upgradient of the former underground storage tank location. MW-1 exhibits the presence of VPH fractions that have decreased since October 2000. A pike in the concentrations of C5-C8 aliphatics, C9-C10 aromatics and C9-C12 aliphatics was observed in April 2010 but this date and all other sampling events for MW-1 have not exceeded the applicable MassDEP published GW-2 and G-3 standards.

Source Area Monitoring Well - B104-MW

Monitoring well B104-MW is located in the former underground storage tank location and exhibits the presence of VPH fractions that have fluctuated within a consistent range of concentrations since December 2006. The C9-C10 aromatics and C9-C12 aliphatics have not exceeded the MassDEP published GW-2 standard over the history of sampling results. An exception is the C9-C12 aliphatic concentration which during the last sampling event exceeded the GW-2 standard for the first time. The C5-C8 aliphatics has fluctuated above and below the GW-2 MassDEP standard on alternating sampling dates from 2010 through 2013. The pattern appears to be slight exceedences of the GW-2 standard in April and concentrations less than the GW-2 standard in October. None of the VPH fractions exceed the MassDEP published GW-3 standards.

Downgradient Monitoring Wells - B103-MW and MW-4

Monitoring well B103 is located immediately downgradient of the former UST location. The dissolved VPH fraction concentrations have decrease since April 2005 and for the majority of the dates do not exceed the MassDEP published GW-2 values. Samples collected since June 2010 have fluctuated above and below the MassDEP published GW-2 standard. On two or three sampling dates, depending on the VPH fraction, C5-C8 aliphatics and C9-C12 aromatics have exceeded the GW-2 standard. C9-C10 aromatics concentrations have not exceeded the GW-2 standard since April 2005. None of the VPH fractions exceed the GW-3 standard

Monitoring well MW-4 is located further downgradient of the former UST locations. Monitoring well MW-4 located in the former underground storage tank location. MW-4 exhibits the presence of VPH fractions that have fluctuated within a consistent range of concentrations since April 2005. The C9-C10 aromatics and C9-C12 aliphatics have exceeded the MassDEP published GW-2 standard over the history of sampling results. An increase in the C9-C12 aliphatic concentration has been observed over the last two sampling events. The C5-C8 aliphatics have not exceeded the MassDEP GW-2 standard since April 2005. None of the VPH fractions exceed the MassDEP published GW-3 standards.



Crossgradient Monitoring Wells

Monitoring wells B101-MW and B102B-MW are located crossgradient of the dissolved gasoline plume. The monitoring wells approximate the width of the dissolved gasoline plume.

Monitoring well B102B-MW is located nearest the occupied downgradient building which is commercial in nature. This monitoring well is only sampled during elevated water table conditions. The concentrations have declined since April 2005 and approach non-detectable concentrations for all three VPH fractions during the most recent sampling event. The concentrations of VPH fractions have not exceeded the MassDEP GW-2 or GW-3 published standards since April 2008.

Monitoring well B101-MW is located on the downgradient corner of the property nearest Swanton Street. This monitoring well exhibits the presence of all three VPH fractions at concentrations which have decreased since December 2007. The latest sampling event in April 2013 has identified very low VPH concentrations. All VPH fractions are less than the MassDEP published GW-2 and GW-3 standards.

4.0 July 2007 Soil Gas Survey

REMSERV, Inc. conducted a soil gas survey based on the elevated dissolved VPH fractions and target analytes identified in ground water since 2000. The purpose of the soil gas survey was to collect data that could be used to assess the potential for soil gas to migrate to indoor air at the commercial building and the residences abutting the site to the west and north, respectively (Figure 5).

On July 13, 17, 18, and 30, 2007 REMSERV, Inc. completed 26 soil gas probes through asphalt cover along the south side of 12 Swanton Street and along the western property boundary (SG-1 through SG-25 and SG-21A) (Figure 2). The probes were completed through asphalt cover. The results of the soil gas survey are summarized in Table 3.

4.1 Soil Gas Survey – Northern Property Boundary

On July 13, 2007 REMSERV, Inc. advanced, by hand, soil gas probes SG-1 through SG-9 to approximately four (4) feet bgs using a slam bar threaded to a perforated soil probe. After attaining the desired depth the slam bar was detached and a quick-connect sampling fitting was attached to the top of the probe where it protruded from the ground. The annular space surrounding the soil probe was sealed to prevent atmospheric air from entering the soil gas probe. A MiniRae 2000 PID (10.6 eV) calibrated to a benzene standard was utilized to evacuate and screen soil gas for the presence of total volatile organic compounds (TVOCs). Each soil gas probe was monitored for an approximately three (3) minute period during which REMSERV, Inc. recorded the maximum, stabilized, and background PID readings (Table 3).



The maximum TVOC readings observed in soil gas points advanced along the northern property boundary ranged from 0.3 ppm (SG-8) to 3.2 ppm (SG-1) (Table 3). The sustained TVOC readings observed in soil gas points advanced along the northern property boundary ranged from 0.0 ppm (SG-7 and SG-8) to 0.7 ppm (SG-1). Background TVOC readings did not exceed 0.1 ppm TVOC (Table 3).

4.2 Soil Gas Survey – Western Property Boundary

On July 17 and 18, 2007 REMSERV, Inc. advanced soil gas probes SG-10 through SG-25 using one-inch diameter Geoprobe rods driven by a 30 lb. manual slide hammer. REMSERV, Inc. advanced soil gas probes SG-10 through SG-25 to approximately four (4) feet bgs prior to collecting a soil gas sample. REMSERV, Inc. utilized a Geopump 2 peristaltic pump to evacuate soil gas at a rate of 0.3 liters per minute while simultaneously monitoring the soil gas discharge using the MiniRae 2000 PID. Maximum, sustained, and background TVOC readings were recorded during the evacuation period for each soil gas point (Table 3).

The maximum TVOC readings observed in soil gas points advanced along the western property boundary ranged from 0.5 ppm (SG-9 and SG-21A) to 9.0 ppm (SG-20) (Table 3). The sustained TVOC readings observed in soil gas points advanced along the western property boundary ranged from 0.1 ppm (SG-9) to 6.1 ppm (SG-18). Background TVOC readings for soil gas points SG-13 and SG-16 through SG-20 were elevated above 1.0 ppm TVOC (Table 3).

Soil gas points SG-10 through SG-20 were advanced on July 17, 2007 during humid and rainy conditions. It is REMSERV, Inc. opinion that elevated background readings may have been the result of the instrument's (PID) sensitivity to moisture. Soil gas points SG-21 through SG-24, advanced and screened during drier conditions on July 18, 2007, identified soil gas background readings that ranged between 0.0 ppm and 0.1 ppm TVOCs.

4.3 Soil Gas Point SG-25

Based on the soil gas readings in SG-16 REMSERV, Inc. advanced an additional soil gas probe (SG-25) approximately 12 inches to the southeast and closer to the source area. As a conservative estimate of potential exposure to indoor air, REMSERV, Inc. collected a soil gas sample from SG-25 for laboratory analysis according to the MADEP Air Phase Hydrocarbon (APH) Method.

On July 30, 2007 REMSERV, Inc. advanced soil gas point SG-25 approximately twelve inches southeast of SG-16. REMSERV, Inc. selected this location based on elevated TVOC readings identified in SG-16 on July 17, 2007 as well as the proximity of the nearest occupied structure. REMSERV, Inc. prescreened the



soil gas in SG-25 using the hand-held PID. The PID maximum, sustained, and background TVOC readings exhibited by SG-25 were 1.2 ppm, 0.8 ppm, and 0.0 ppm respectively (Table 3).

REMSERV, Inc. proceeded to collect a soil gas sample in a SUMMA canister at this location. The SUMMA canister was prepared by Alpha Analytical. REMSERV, Inc. used threaded fittings and dedicated polyethylene tubing to connect the soil gas sampling rod to a laboratory calibrated flow control regulator prepared by Alpha. The SUMMA canister was connected to the down flow side of the regulator and the flow control valve was opened. The SUMMA Canister was calibrated by Alpha for a two-hour sample collection period at a constant flow rate.

The soil gas sample was submitted to Alpha under Chain of Custody for MADEP Air Phase Hydrocarbon (APH) analysis. Pre and post sampling pressure values were recorded by Alpha (-28.7 in Hg and -5.1 in Hg, respectively) to ensure that an adequate soil gas volume was collected to meet APH quality control standards. The APH laboratory analytical results are summarized in Table 4 and laboratory analytical data sheets are attached as Appendix II.

4.3.1 APH Analytical Results

The APH Method analysis of soil gas sample SG-25 identified hydrocarbon fractions and target analytes at the following concentrations (Table 4):

C5-C8 aliphatics	1,590 ug/m ³
C9-C12 aliphatics	$11,500 \text{ ug/m}^3$
C9-C10 aromatics	639 ug/m^3
MTBE	35.8 ug/m^3

No other APH fractions or target analytes were identified at concentrations exceeding the laboratory minimum detection limits (Table 4).

The results of APH analysis did not identify any petroleum contaminants at concentrations exceeding the Soil Gas GC Screening Levels identified in Table 4-10 of MADEP Policy #WSC-02-411. As mentioned previously, the MassDEP has published these threshold values to be protective of potential indoor air impacts. The APH analytical results also did not exceed the commercial/industrial sub-slab soil gas screening values published in Appendix II of the December 2011 WSC#-11-435 "Interim Final Vapor Intrusion Guidance". Based on the results of the soil gas survey and soil gas APH analysis it is REMSERV, Inc.'s opinion that the potential does not exist for dissolved contamination to affect the indoor air of the downgradient occupied structures.



5.0 Public Involvement History

On May 13, 2013, the Bossi Realty Trust received a petition from the petitioners group requesting that the Former Bossi Service Station disposal site be designated a Public Involvement Plan (PIP) site, in accordance with M.G.L. c. 21E. On May 30, 2013, the Bossi Realty Trust formally responded to the petition, accepting the designation as a PIP site. By accepting the PIP designation, Bossi Realty Trust has agreed to develop a draft Plan and conduct public involvement activities at the site. In developing this Public Involvement Plan, REMSERV, Inc. has conducted interviews in May and June 2013 with key officials and individuals interested in the site. Concerns identified are presented in Exhibit I.

On June 20, 2013 a group interview of the petitioners was conducted at the Winchester Library Large Meeting Room.

On June 13, 2013 a notice was published in the <u>Winchester Star</u> regarding the July 1, 2013 scheduled date for the presentation of the DRAFT Public Involvement Plan.

On June 27, 2013 a DRAFT Public Involvement Plan was completed and placed on display at the Winchester Public Library Repository.

On July 1, 2013 the DRAFT Public Involvement Plan was presented at the Winchester Library Large Meeting Room to the petitioners. The DRAFT Public Involvement Plan incorporated and responded to the questions raised during the petitioner's group interview.

On July 29, 2013 the comments on the DRAFT Public Involvement Plan were submitted by the petitioners.

6.0 Addressing Public Concerns

The process for assessing and cleaning up disposal sites as set forth in the Massachusetts Contingency Plan (310 CMR 40.00), is designed to address the effects of the site on health, safety, public welfare, and the environment. 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.

Once a release of oil or hazardous materials has been confirmed at a disposal site and the MassDEP has been notified, the process proceeds to a Phase II Comprehensive Site Assessment which is a



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.

Following the Phase II, an identification and evaluation of remedial response action alternatives and selection of feasible measures that will achieve a permanent cleanup at the site is conducted under a Phase III Remedial Action Plan. The Phase IV Remedy Implementation Plan is prepared which presents how the selected remedial alternative will be implemented at the site.

The Phase IV at the Former Bossi Service Station included environmental field testing to document the contaminant conditions at the site are stable and the continued migration of contaminants has been reduced or stabilized at levels which do not pose an imminent hazard, substantial hazard or a condition of significant risk or threat to public health, safety, welfare or the environment.

As noted in Exhibit I, the public has raised a number of concerns about the Former Bossi Service Station disposal site.

The remedial response action planning process is designed to address the concerns about the nature and extent of contamination; risks posed by the site to health, safety, public welfare, and the environment; and the adequacy of proposed cleanup measures. The site is in a Class C-2 Response Action Outcome and these concerns were primarily addressed in Phases II and III of this process.

The petitioners requested that Bossi Realty Trust address issues relating to the potential future development of the site under the PIP site designation and remedial response activities pertaining to such development. The Bossi Realty Trust has responded to these additional requests.

7.0 Public Involvement Activities

In accordance with the MCP (40.200), activities undertaken to involve the public in response actions serve two purposes:

1. <u>to inform the public</u> about the risks posed by the disposal site, the status of remedial response actions, and the opportunities for public involvement; and

2. <u>to solicit the concerns of the public</u> 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, Bossi Realty Trust has undertaken specific activities during the remedial response process at the Former Bossi Service Station disposal site. These activities are



described below.

7.1 Informing The Public

The Bossi Realty Trust has provided site-specific information to the public by establishing information repositories; developing and maintaining a site mailing list to distribute information about the site; and providing advance notification to local officials and residents about site activities. The Bossi Realty Trust has created a website <u>www.bossipip.info</u> where draft versions of substantive submittals to be submitted to the MassDEP will be posted for public review. The Bossi Realty Trust will provide updated information associated with the 21e process under the Massachusetts Contingency Plan in a timely fashion when it becomes available my posting the documentation on the website and an email notification will be provided to the key petitioner of the availability of this information.

7.1.1 Information Repositories

<u>Publicly Available Site</u> Files: A file on the Former Bossi Service Station disposal site is maintained at the Northeast Regional DEP Office, 205B Lowell Street, Wilmington, MA (781) 694-3200 under Release Tracking Number (RTN) 3-18598. The file will contain all documents pertaining to the site with the exception of any enforcement-sensitive material. Appointments to view the site files can be made by contacting (Site Assessment File Review Contact Person at DEP Regional office, address and phone number). The majority of the information contained in these files can be viewed on the electronic portal provided by the MassDEP at

http://public.dep.state.ma.us/SearchableSites2/Search.aspx by entering the RTN 3-18598 in the "Look Up" window.

Local Information Repositories: The Bossi Realty Trust has established and will maintain a local information repository for large format site plans as well as previously submitted documents at the Winchester Public Library. This will provide the site community residents with easy access to information about the site cleanup process and results of site investigations. The site information repository contains technical reports and documents summarizing results and recommendations; relevant correspondence; press releases; public information materials; the Public Involvement Plan; public meeting summaries; summaries of responses to comments received; and copies of public notices about the disposal site.. Information will be sent to the repository by (PRP) as it is developed.



The information repository for the Former Bossi's Service Station disposal site is located at:

Winchester Public Library 80 Washington Street Winchester, MA 01890 Contact Person (if appropriate) 781-721-7171 Monday–Thurs 9:30am – 9:00pm Friday 9:30am – 5:30pm Saturday 9:30am – 5:30pm Sunday Closed for Summer (May 12 - Sep 29)

The information will be on display with an index of the materials provided and the date on which the materials was provided. The annotated list of documents will index the submittal number followed by the article number in the order of the materials provided at the repository. For instance, the first document in the first submittal will be labeled "1.1". The first document in the second submittal will be "2.1" and so on.

7.1.2 Site Mailing List

The Bossi Realty Trust will establish a mailing list for the former Bossi Service Station disposal site. The site mailing list will include: petitioners, interested residents, site abutters, local and regional news media, municipal officials (the Chief Municipal Officer and the Chairperson of the Board of Health), state legislators, MassDEP, and anyone else indicating an interest in receiving information about the 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 Former Bossi Service Station disposal site. The Bossi Realty Trust will maintain the mailing list and update it as necessary. The Bossi Realty Trust will provide MassDEP with a copy of the site mailing list. Anyone wishing to be added to the mailing list can call or write to:

Mr. Tom Simmons REMSERV, Inc. 35 Winthrop Street Winchester, MA 01890 781-721-4455



7.1.3 Notification to Local Officials and Residents of Major Milestones and Events

The Massachusetts Contingency Plan requires community notification of major planning and implementation milestones at disposal sites. Major milestones include: 1) the start of field work, related to response actions, involving heavy equipment or protective clothing (Level A or B protection); 2) the completion of a Response Action Outcome; and 3) the start of any Release Abatement Measures (RAM).

Notification will be made by the PRP to the people on the Notification List orally or by writing at least 3 days 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 where the report can be reviewed. Those to be notified include:

Notification List

Mr. Douglas Marmon, Chairman of the Board of Selectmen, 16 Kenwin Road, Winchester `781-729-6985

Ms. Jennifer Murphy, MPH, Director of the Board of Health, Lower Level Town Hall, 71 Mount Vernon Street, Winchester, MA 01890

State Representative Jason M. Lewis, State House, Room 466, Boston MA 02133

State Senator Katherine Clark, State House, Room 513, Boston, MA 02133

State Senator Patricia D. Jehlen, State House, Room 313A, Boston, MA 02133

Key Petitioner Randell Drane, 330 Washington Street, Winchester, MA 01890

In addition, the Winchester Fire and Police Departments will be notified in situations where public safety is a concern.

7.2 Soliciting Public Input

The Bossi Realty Trust will provide opportunities for public input regarding site cleanup decisions by holding public comment periods to provide additional opportunities for oral and written input regarding site cleanup decisions and preparing summaries of all comments received during the public comment period and responses to them.



7.2.1 Public Comment Periods

The Bossi Realty Trust will provide specific opportunities for the public to submit comments about documents concerning the site. When key 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 site mailing list. The notice will include the title of the document, where it is available for review, information about how to submit comments to Bossi Realty Trust and the length of the public comment period. Bossi Realty Trust will determine the length of the comment period, which will normally be 20 calendar days, but may be longer if warranted by the complexity of a particular document or if requested by the public. Comment periods for Immediate Response Activities (IRA) may be reduced or eliminated with MassDEP's review and concurrence if the nature of the hazard dictates that an IRA be performed immediately. Bossi Realty Trust will be responsible for providing document copies to the information repositories and to the MassDEP site file, as well as sending out notices of availability of any documents it prepares.

Documents potentially available for public comment will include:

Response Action Outcome Statement and

Activity and Use Limitation (if necessary).

7.2.2 Response to Comments

The Bossi Realty Trust will prepare a summary of all comments received on each document available for public comment, and Bossi Realty Trusts responses to these comments. 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 MassDEP site file. Bossi Realty Trust will also send a notice of availability of the response summary to the mailing list. The summary will be made available prior to Bossi Realty Trust taking the remedial response action submitted for comment, or prior to moving to the next MCP phase.

7.2.3 Public Meetings

The Bossi Realty Trust will brief the public about the status of the Former Bossi Service Station disposal site during the remedial action process. Meetings will take place at the following milestones:

• Response Action Outcome Filing



When significant new materials become available that represents a milestone in the assessment process.

Meetings will serve two purposes: 1) to provide 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 remedial action plans for the site.

Bossi Realty Trust will send notices announcing public meetings to individuals on the site mailing list. Bossi Realty Trust will prepare meeting summaries, submit the summaries to MassDEP, and place a copy of the summaries in the local information repository.

8.0 Schedule For Public Involvement Activities

Exhibit II provides a schedule of the public involvement activities listed in Section 4.0. The schedule specifies the milestones during the remedial response, action when public involvement activities will be conducted.

9.0 Responsibility For Implementing The Public Involvement Plan

The Former Bossi Service Station disposal site is a Tier II site and the Bossi Realty Trust has been assigned responsibility for conducting both remedial and public involvement activities at this site. Bossi Realty Trust 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 PRPs, MassDEP has established an appeal process for handling disputes about public involvement activities. 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 MassDEP 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 specific sections 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 MassDEP. 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, in accordance with Section 7 of this 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 MassDEP documenting their concerns, actions taken to date to resolve the issues, and their inability to resolve the issues independently of MassDEP. When MassDEP receives this information, it will take the following actions:

1. <u>Review the information Packages</u> to assess specific petitioner complaints, identify other community concerns, and determine what public involvement activities, as specified in the Plan, have and have not been conducted. MassDEP may inspect local information repositories, review notification letters, and contact members of the Notification List.

2. <u>Determine whether the PRP has made any efforts to address community issues.</u> 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 review of the appeal petition, MassDEP determines that the Public Involvement Plan is not being implemented, MassDEP may take one or more of the following actions:

a. Adding a condition to waiver approval requiring the PRP to hire a public involvement consultant specifically to perform activities contained in the final Plan; and/or
b. Conducting an audit of the site to determine whether the PRP is conducting the response action in compliance with the MCP, any waiver conditions, and/or the final Public Involvement Plan. Based on the results of the audit, DEP will determine whether waiver status for the site will be maintained or revoked.

10.0 Revisions To This Plan

This Public Involvement Plan may be revised as necessary during the course of the remedial response action process. If revisions are proposed, Bossi Realty Trust will place copies of any proposed changes in the local information repository, and will send a notice of the availability of recommended changes to the mailing list. The Bossi Realty Trust will hold a twenty-day public comment period (see Section 4.2.1 above) on the proposed revised Plan. The Bossi Realty Trust will review any comments received and revise the Plan as appropriate. The final revised Plan will be placed in the information repository.

Sample ID	Sampling Date	Sample Depth (feet)	(mqq)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	MTBE (mg/kg)	o-Xylene (mg/kg)	m+p-Xylene (mg/kg)	Total Xylenes (mg/kg)	Naphthalene (by MA VPH) (mg/kg)	Naphthalene (by MA EPH) (mg/kg)	2-methylnaphthalene (mg/kg)	C ₅ -C ₈ Aliphatics (mg/kg)	Cy-C ₁₂ Aliphatics (mg/kg)	Cy-C ₁₀ Aromatics (mg/kg)	Cy-C ₁₈ Aliphatics (mg/kg)	C ₁₉ -C ₃₆ Aliphatics (mg/kg)	C ₁₁ -C ₂₂ Aromatics (mg/kg)
Method 1 S-1				30	500	500	100	NS	NS	500	500	500	500	100	1,000	100	1,000	3,000	800
Method 1 S-2				200	1,000	1,000	500	NS	NS	1,000	1,000	1,000	1,000	500	2,500	500	2,500	5,000	2,000
Method 1 S-3				900	3,000	2,500	500	NS	NS	3,000	700	700	3,000	500	5,000	500	5,000	5,000	5,000
UCLs				9,000	10,000	10,000	5,000	NS	NS	10,000	10,000	10,000	10,000	5,000	20,000	5,000	20,000	10,000	10,000
*MW-1 (10'-12') ¹	10/13/00	12	110	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.2	<0.5	<0.51	<0.51	1	1.9	<1	<31	<31	<31
*MW-2 (10'-12')	10/13/00	12	0.0	NA	NA	NA	NA	NA	NA	NA	NA	< 0.52	< 0.52	NA	NA	NA	<31	<31	<31
*MW-3 (10'-12') ¹	10/13/00	12	828	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.2	<0.5	<0.5	<0.5	2.0	2.2	1.4	<30	<30	<30
*MW-4 (15'-15.5') ¹	10/13/00	16	>1,000	<3.3	470	170	10	260	620	880	60	29	26	2,100	<33	2,400	350	<33	120
B101 S4 13-151	02/28/05	15	376	<0.089	0.14	<0.089	<0.089	<0.089	<0.179	<0.268	0.332	<0.147	0.162	16.4	6.08	8.66	<29.6	<29.6	<29.6
B102 S1B 11.5-12	02/28/05	12	0.0	<0.063	<0.063	<0.063	<0.063	<0.063	<0.126	<0.189	<0.063	<0.149	<0.149	<0.94	<0.313	<0.313	<30	<30	<30
B103 S1 13-15 ¹	02/28/05	15	520	1.75	39.6	24.2	<0.748	35.4	92.4	127.8	9.55	3.92	3.99	639	217	280	43.3	<35.3	40.6
B104 S1 13-15 ¹	02/28/05	14	72.6	<0.793	5.99	2.72	<0.793	2.62	9.10	11.72	5.82	0.642	1.66	1,130	350	216	129	<36.1	57.3
EPC				1.8	128.9	65.6	10.0	99.3	240.5	339.8	18.9	11.2	8.0	648.1	115.4	581.2	174.1	16.3	23.4

LEGEND

BDLBelow Laboratory Detection LimitsNSNo Standard PublishedNANot AnalyzedNRNot ReportedEPCSoil Exposure Point Concentration*Sample Collected by Web Engineering1Indicates that the soil sample was used in the EPC calculations

Notes:

1. Bolded values indicate concentrations above site applicable standards.

2. All concentrations and standards reported in mg/kg.

3. EPCs are calculated using one-half the minimum detection limit for samples with values below the laboratory detection limit

Sample ID	Sampling Date	PVC Casing Elevation (feet)	Depth to Water (feet)	Groundwater Elevation (feet)	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	m+p -Xylene (ug/L)	o-Xylene (ug/L)	Total Xylenes (ug/L)	MTBE (ug/L)	Naphthalene (by VPH) (ug/L)	Naphthalene (by EPH) (ug/L)	2-Methylnaphthalene (ug/L)	Phenanthrene	Fluorene	C ₅ -C ₈ Aliphatics (ug/L)	C ₉ -C ₁₂ Aliphatics (ug/L)	C ₉ -C ₁₀ Aromatics (ug/L)	C ₉ -C ₁₈ Aliphatics (ug/L)	C ₁₉ -C ₃₆ Aliphatics (ug/L)	C ₁₁ -C ₂₂ Aromatics (ug/L)
GW-1 Standard					5	1,000	700	NS	NS	10,000	70	140	140	10	40	30	300	700	200	700	14,000	200
GW-2 Standard					2,000	50,000	20,000	NS	NS	9,000	50,000	1,000	1,000	2,000	NA	NA	3,000	5,000	7,000	5,000	NS	50,000
GW-3 Standard					10,000	40,000	5,000	NS	NS	5,000	50,000	20,000	20,000	20,000	10,000	40	50,000	50,000	50,000	50,000	50,000	5,000
UCLs					100,000	100,000	100,000	NS	NS	100,000	100,000	100,000	100,000	100,000	100,000	400	100,000	100,000	100,000	100,000	100,000	100,000
*MW-1	10/24/00	NM	13.70		11	40	37	110	28	138	16	BDL	2.3	1.4	BDL	BDL	1,400	340	440	BDL	BDL	BDL
(GW-2, GW-3)	04/01/05		10.87		11.4	12.4	26.8	50.8	9.6	60.4	BDL	10.8	BDL	BDL	BDL	BDL	753	159	300	BDL	BDL	BDL
·	12/19/06		12.37		BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.569	BDL	BDL	BDL	370	229	111	BDL	BDL	BDL
·	08/10/07	102.12	13.08	89.04	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	#N/A	NA	NA	NA	NA	NA
	12/31/07		12.97	89.15	BDL	BDL	3.99	BDL	BDL	BDL	3.46	BDL	NA	NA	NA	NA	4/4	128	150	NA	NA	NA
	05/04/08		12.87	91.07	BDL	BDL	BDL	2.38 PDI	BDL	2.38 RDI	BDL	BDL	BDL	NA	NA	NA	92.8	114	128	NA	NA	NA
	12/15/08		12.87	90.03	BDL	BDL	2 91	BDL	BDL	BDL	BDL	BDL	NA	NA	NΔ	NA	311	114	106	NA	NA	NA
	03/31/09		11.03	90.03	BDL	2.7	9.72	24.1	10.1	34.2	BDL	BDL	NA	NA	NA	NA	461	161	263	NA	NA	NA
	06/08/09		12.66	89.46	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	338	136	87.4	NA	NA	NA
	09/03/09		12.79	89.33	BDL	BDL	2.23	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	125	BDL	98.6	NA	NA	NA
	01/15/10		12.48	89.64	BDL	BDL	3.51	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	290	64.4	97.8	NA	NA	NA
	03/18/10		8.12	94.00	2.85	95.9	686	1,340	279	1,619	14.4	173	NA	NA	NA	NA	2,770	2,410	2,500	NA	NA	NA
	06/18/10		12.66	89.46	BDL	BDL	2.77	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	286	122	80.5	NA	NA	NA
	10/05/10		13.34	88.78	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	92	97	BDL	NA	NA	NA
	04/06/11		11.53	90.59	BDL	7.54	21.7	78	35.2	113.2	4.12	13	NA	NA	NA	NA	460	83.8	494	NA	NA	NA
	10/14/11		12.20	89.92	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	145	103	BDL	NA	NA	NA
	03/27/12		12.50	89.62	BDL	BDL	6.86	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	321	176	82.3	NA	NA	NA
·	07/16/12		12.62	89.50	BDL	BDL	5.71	5.71	BDL	5.71	BDL	4.11	NA	NA	NA	NA	253	265	286	NA	NA	NA
	04/22/13		12.11	90.01	<2.00	<2.00	5.80	2.58	2.00	4.58	<3.00	<4.00	NA	NA	NA	NA	305	205	100	NA	NA	NA
*MW-3	10/24/00	NM	13.20		1,900	23,000	4,500	17,000	7,200	24,200	BDL	830	170	140	1.1	1.4	30,000.0	21,000.0	17,000.0	1,500.0	BDL	630
*MW-4	10/24/00	NM	13.34		1,900	41,000	6,200	25,000	12,000	32,000	3,500	1,100	280	170	1.7 DDI	1.3	47,000	29,000	18,000	1,300	BDL	800
(GW-2, GW-3)	12/10/06		10.43		BDL	1,950	4,480	6 200	1,640	25,140	BDI	504	379	108	BDL	BDL	22,400	5,830	10,200	4,200 PDI	BDL	400
	08/10/07	100.52	12.28	88.24	NA	NA	1,430 NA	0,200 NA	1,850 NA	0,030 NA	NA	594 NA	275 NA	NA	NA	NA	2,440 NA	5,450 NA	NA	NA	NA	NA
	03/04/08	100.52	10.50	90.02	BDL	BDL	1 750	7 790	2 180	9 970	BDL	854	NA	NA	NA	NA	BDL	6 590	13 800	NA	NA	NA
	07/03/08		12.06	88.46	BDL	BDL	1,750	5.580	1.470	7,050	BDL	BDL	NA	NA	NA	NA	BDL	BDL	11,700	NA	NA	NA
•	12/15/08		11.05	89.47	BDL	BDL	1,050	4,900	1,000	5,900	BDL	809	NA	NA	NA	NA	BDL	6,700	13,600	NA	NA	NA
	03/31/09		11.22	89.30	BDL	BDL	761	3,890	484	4,374	BDL	679	NA	NA	NA	NA	BDL	5,360	15,300	NA	NA	NA
	06/08/09		11.93	88.59	BDL	BDL	758	3,760	609	4,369	BDL	629	NA	NA	NA	NA	BDL	7,760	13,100	NA	NA	NA
	09/03/09		11.94	88.58	BDL	BDL	1,020	5,130	1,010	6,140	BDL	869	NA	NA	NA	NA	BDL	BDL	16,100	NA	NA	NA
	01/15/10		11.66	88.86	BDL	BDL	720	3,590	643	4,233	BDL	554	NA	NA	NA	NA	BDL	BDL	15,400	NA	NA	NA
	03/18/10		8.16	92.36	BDL	BDL	483	2,590	271	2,861	BDL	631	NA	NA	NA	NA	BDL	7,330	14,200	NA	NA	NA
	06/18/10		11.91	88.61	BDL	BDL	764	3,850	532	4,382	BDL	615	NA	NA	NA	NA	2,580	4,870	19,000	NA	NA	NA
	10/05/10		12.85	87.67	BDL	BDL	416	2,050	310	2,360	BDL	305	NA	NA	NA	NA	1,910	4,560	11,400	NA	NA	NA

Sample ID	Sampling Date	PVC Casing Elevation (feet)	Depth to Water (feet)	Groundwater Elevation (feet)	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	m+p -Xylene (ug/L)	o-Xylene (ug/L)	Total Xylenes (ug/L)	MTBE (ug/L)	Naphthalene (by VPH) (ug/L)	Naphthalene (by EPH) (ug/L)	2-Methylnaphthalene (ug/L)	Phenanthrene	Fluorenc	C ₅ -C ₈ Aliphatics (ug/L)	C ₉ -C ₁₂ Aliphatics (ug/L)	C ₉ -C ₁₀ Aromatics (ug/L)	C ₉ -C ₁₈ Aliphatics (ug/L)	C ₁₉ -C ₃₆ Aliphatics (ug/L)	C ₁₁ -C ₂₂ Aromatics (ug/L)
GW-1 Standard					5	1,000	700	NS	NS	10,000	70	140	140	10	40	30	300	700	200	700	14,000	200
GW-2 Standard					2,000	50,000	20,000	NS	NS	9,000	50,000	1,000	1,000	2,000	NA	NA	3,000	5,000	7,000	5,000	NS	50,000
GW-3 Standard					10,000	40,000	5,000	NS	NS	5,000	50,000	20,000	20,000	20,000	10,000	40	50,000	50,000	50,000	50,000	50,000	5,000
UCLs					100,000	100,000	100,000	NS	NS	100,000	100,000	100,000	100,000	100,000	100,000	400	100,000	100,000	100,000	100,000	100,000	100,000
	04/06/11		10.80	89.72	BDL	BDL	427	2,490	246	2,736	BDL	620	NA	NA	NA	NA	BDL	BDL	16,800	NA	NA	NA
	10/14/11		11.44	89.08	BDL	BDL	359	1,790	120	1,910	BDL	487	NA	NA	NA	NA	BDL	7,750	11,800	NA	NA	NA
	03/27/12		11.97	88.55	BDL	BDL	444	2,260	143	2,403	BDL	450	NA	NA	NA	NA	2,020	16,100	17,100	NA	NA	NA
	07/16/12		12.00	88.52	BDL	BDL	534	2,630	242	2,872	BDL	614	NA	NA	NA	NA	4,640	18,300	21,800	NA	NA	NA
	04/22/13		11.49	89.03	<2,500	<2,500	317	1,450	150	1,600	<150	390	NA	NA	NA	NA	<2,500	13,000	12,400	NA	NA	NA
B101-MW	04/01/05	100.00	9.99	90.01	BDL	7.2	58.5	212	12.3	224.3	BDL	92.4	44.5	96.3	BDL	BDL	1,110	1,110	4,230	300	BDL	600
(GW-3)	12/19/06		11.15	88.85	BDL	BDL	4.42	BDL	BDL	BDL	BDL	BDL	6.18	11.3	0.572	BDL	683	247	725	BDL	BDL	194
	08/10/07		11.83	88.17	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	12/31/07		11.72	88.28	BDL	BDL	BDL	22.3	BDL	22.3	BDL	BDL	NA	NA	NA	NA	1,680	562	2,230	NA	NA	NA
	03/04/08		10.07	89.93	BDL	BDL	5.31	6.29	BDL	6.29	4.45	12.1	NA	NA	NA	NA	679	215	1,150	NA	NA	NA
	07/03/08		11.60	88.40	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	796	BDL	994	NA	NA	NA
	12/15/08		10.58	89.42	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	504	190	406	NA	NA	NA
	03/31/09		10.78	89.22	BDL	BDL	3.19	3.76	BDL	3.76	BDL	BDL	NA	NA	NA	NA	834	258	805	NA	NA	NA
	06/08/09		11.52	88.48	BDL	BDL	2.4	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	367	262	591	NA	NA	NA
	09/03/09		11.52	88.48	BDL	BDL	2.05	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	692	186	461	NA	NA	NA
	01/15/10		11.26	88.74	BDL	BDL	BDL	2.46	BDL	2.46	BDL	BDL	NA	NA	NA	NA	616	60.8	490	NA	NA	NA
	03/18/10		7.78	92.22	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	122	85.0	BDL	NA	NA	NA
	06/18/10		11.39	88.61	BDL	BDL	2.33	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	374	221	225	NA	NA	NA
	10/05/10		12.41	87.59	BDL	51.4	BDL	11.9	BDL	11.9	BDL	BDL	NA	NA	NA	NA	500	BDL	672	NA	NA	NA
	04/06/11		10.39	89.61	BDL	BDL	BDL	2.78	BDL	2.78	BDL	6.85	NA	NA	NA	NA	260	BDL	252	NA	NA	NA
	10/14/11		10.95	89.05	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	267	71.8	96.3	NA	NA	NA
	03/27/12		11.46	88.54	BDL	BDL	2.04	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	401	229	278	NA	NA	NA
	07/16/12		11.63	88.37	2.34	BDL	2.36	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	498	317	348	NA	NA	NA
	04/22/13		11.07	88.93	<2.00	<2.00	2.12	<2.00	<2.00	<4.00	<3.00	<4.00	NA	NA	NA	NA	373	367	384	NA	NA	NA

Sample ID	Sampling Date	PVC Casing Elevation (feet)	Depth to Water (feet)	Groundwater Elevation (feet)	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	m+p -Xylene (ug/L)	o-Xylene (ug/L)	Total Xylenes (ug/L)	MTBE (ug/L)	Naphthalene (by VPH) (ug/L)	Naphthalene (by EPH) (ug/L)	2-Methylnaphthalene (ug/L)	Phenanthrene	Fluorene	C ₅ -C ₈ Aliphatics (ug/L)	C ₉ -C ₁₂ Aliphatics (ug/L)	C ₉ -C ₁₀ Aromatics (ug/L)	C ₉ -C ₁₈ Aliphatics (ug/L)	C ₁₉ -C ₃₆ Aliphatics (ug/L)	C ₁₁ -C ₂₂ Aromatics (ug/L)
GW-1 Standard					5	1,000	700	NS	NS	10,000	70	140	140	10	40	30	300	700	200	700	14,000	200
GW-2 Standard					2,000	50,000	20,000	NS	NS	9,000	50,000	1,000	1,000	2,000	NA	NA	3,000	5,000	7,000	5,000	NS	50,000
GW-3 Standard					10,000	40,000	5,000	NS	NS	5,000	50,000	20,000	20,000	20,000	10,000	40	50,000	50,000	50,000	50,000	50,000	5,000
UCLs					100,000	100,000	100,000	NS	NS	100,000	100,000	100,000	100,000	100,000	100,000	400	100,000	100,000	100,000	100,000	100,000	100,000
B102B-MW	04/01/05	100.97	11.35	89.62	230	1,600	680	2,560	1,910	4,470	87.4	368	114	30.6	BDL	BDL	4,620	2,250	6,910	400	BDL	500
(GW-2, GW-3)	12/19/06	100.05	11.83	89.14	No Sample Co	Dilected																
	08/10/07	100.96	Monitoring	s well Dry D	uring Sampling	Event 471	112	400	245	654	16.1	PDI	NA	NA	NA	NA	606	227	268	NA	NA	NA
	03/04/08		Monitoring	Well Dry D	uring Sampling	4/1 Event	112	409	243	034	10.1	BDL	NA	INA	INA	NA	000	557	308	INA	INA	INA
	12/15/08		Monitoring	Well Dry D	uring Sampling	Event																
	03/31/09		Monitoring	Well Dry D	uring Sampling	Event																
	06/08/09		Monitoring	Well Dry D	uring Sampling	Event																
	09/03/09		Monitoring	Well Dry D	uring Sampling	Event																
	01/15/10		Monitoring	Well Dry D	uring Sampling	Event																
	03/18/10		9.26	91.70	10.6	45.0	6.17	37.2	35.5	72.7	BDL	BDL	NA	NA	NA	NA	53.9	67.9	BDL	NA	NA	NA
	06/18/10		Monitoring	Well Dry D	uring Sampling	Event																
	10/05/10		Monitoring	Well Dry D	uring Sampling	Event																
	04/06/11		Monitoring	Well Dry D	uring Sampling	Event																
	10/14/11		Monitoring	Well Dry D	uring Sampling	Event																
	03/27/12		Monitoring	Well Dry D	uring Sampling	Event																
B103-MW	04/01/05	101.04	10.39	90.65	168	4,560	1,790	6,090	2,480	8,570	BDL	392	165	105	BDL	BDL	17,400	2,560	8,950	2,400	BDL	600
(GW-2, GW-3)	12/19/06		11.72	89.32	68.6	2,570	1,330	3,760	1,410	5,170	BDL	253	189	48.5	BDL	BDL	4,940	2,950	3,920	BDL	BDL	191
	08/10/07	101.04	12.42	88.62	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	90	NA	NA	NA
	12/31/07	-	12.53	88.51	BDL	797	1,030	2,310	630	2,940	BDL	261	NA	NA	NA	NA	3,930	1,940	4,140	NA	NA	NA
	03/04/08		10.64	90.40	BDL	476	764	2,580	585	3,165	BDL	303	NA	NA	NA	NA	4,390	2,360	4,320	NA	NA	NA
	12/15/08		12.21	80.61	BDL	435	822	2,130	424	2,354	BDL	208	NA NA	NA NA	INA NA	NA	2,550	2.040	3,240	INA NA	INA NA	NA NA
	03/31/00		11.45	80.68	BDL	308	1 000	2 130	30/	2 524	BDL	226	NA NA	NA NA	NA NA	NA	2,550	2,040	2,540	NA NA	NA NA	NA NA
	06/08/09		12.04	89.00	12.4	272	890	1,120	220	1.340	BDL	211	NA	NA	NA	NA	884	2,120	2,570	NA	NA	NA
	09/03/09		12.13	88.91	BDL	194	1,050	819	157	976	BDL	258	NA	NA	NA	NA	BDL	BDL	3,660	NA	NA	NA
	01/15/10		11.84	89.20	BDL	120	900	896	188	1,084	BDL	255	NA	NA	NA	NA	1,610	1,690	2,860	NA	NA	NA
	03/18/10	1	7.85	93.19	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	NA	NA	NA	NA	BDL	BDL	BDL	NA	NA	NA
	06/18/10]	12.06	88.98	BDL	145	1,040	2,150	634	2,784	BDL	207	NA	NA	NA	NA	4,320	6,110	3780	NA	NA	NA
	10/05/10		12.80	88.22	BDL	261	764	1,650	379	2,029	BDL	147	NA	NA	NA	NA	2,980	1,720	2,570	NA	NA	NA
	04/06/11		11.00	90.04	BDL	122	1,120	1,280	657	1,937	BDL	270	NA	NA	NA	NA	4,940	BDL	5,720	NA	NA	NA
	10/14/11		11.59	89.45	BDL	123	1,050	2,070	366	1,416	BDL	227	NA	NA	NA	NA	2250	3,940	2,560	NA	NA	NA
	03/27/12		13.09	87.95	BDL	171	884	1,210	377	1,587	BDL	189	NA	NA	NA	NA	2460	5,550	3,350	NA	NA	NA
	07/16/12		12.10	88.94	13.1	149	706	779	276	855	21.7	144	NA	NA	NA	NA	2,280	3,630	2,330	NA	NA	NA
	04/22/13		11.55	89.49	<2.00	60.5	733	940	139	1,079	16.8	176	NA	NA	NA	NA	2,770	4,740	2,800	NA	NA	NA

Sample ID	Sampling Date	PVC Casing Elevation (feet)	Depth to Water (feet)	Groundwater Elevation (feet)	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	m+p -Xylene (ug/L)	o-Xylene (ug/L)	Total Xylenes (ug/L)	MTBE (ug/L)	Naphthalene (by VPH) (ug/L)	Naphthalene (by EPH) (ug/L)	2-Methylnaphthalene (ug/L)	Phenanthrene	Fluorenc	C ₅ -C ₈ Aliphatics (ug/L)	C ₉ -C ₁₂ Aliphatics (ug/L)	C ₉ -C ₁₀ Aromatics (ug/L)	C ₉ -C ₁₈ Aliphatics (ug/L)	C ₁₉ -C ₃₆ Aliphatics (ug/L)	C ₁₁ -C ₂₂ Aromatics (ug/L)
GW-1 Standard					5	1,000	700	NS	NS	10,000	70	140	140	10	40	30	300	700	200	700	14,000	200
GW-2 Standard					2,000	50,000	20,000	NS	NS	9,000	50,000	1,000	1,000	2,000	NA	NA	3,000	5,000	7,000	5,000	NS	50,000
GW-3 Standard					10,000	40,000	5,000	NS	NS	5,000	50,000	20,000	20,000	20,000	10,000	40	50,000	50,000	50,000	50,000	50,000	5,000
UCLs					100,000	100,000	100,000	NS	NS	100,000	100,000	100,000	100,000	100,000	100,000	400	100,000	100,000	100,000	100,000	100,000	100,000
B104-MW	04/01/05	101.68	10.77	90.91	36.8	338	843	2,080	780	2,860	38.6	181	88.1	48.3	BDL	BDL	8,890	1,520	3,750	400	BDL	400
(GW-2, GW-3)	12/19/06		12.18	89.50	BDL	43.2	329	875	285	1,160	BDL	BDL	71.1	39.3	BDL	0.464	1,690	777	1,830	BDL	BDL	157
	08/10/07	101.68	12.90	88.78	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	12/31/07		12.96	88.72	BDL	134	496	1,300	306	1,606	BDL	107	NA	NA	NA	NA	2,780	1,070	2,460	NA	NA	NA
	03/04/08		11.08	90.60	BDL	291	618	1,320	368	1,688	BDL	157	NA	NA	NA	NA	2,330	1,310	2,800	NA	NA	NA
	07/03/08		12.68	89.00	BDL	81.1	444	1,020	175	1,195	BDL	BDL	NA	NA	NA	NA	2,480	BDL	2,360	NA	NA	NA
	12/15/08		11.91	89.77	BDL	78.0	418	1,060	205	1,265	BDL	BDL	NA	NA	NA	NA	2,210	1,520	2,120	NA	NA	NA
	03/31/09		11.78	89.90	BDL	100	741	1,750	635	2,385	BDL	176	NA	NA	NA	NA	1,860	1,780	3,250	NA	NA	NA
	06/08/09		12.48	89.20	BDL	84.5	434	938	191	1,129	BDL	109	NA	NA	NA	NA	619	1,420	2,060	NA	NA	NA
	09/03/09		12.64	89.04	BDL	59.8	437	1,020	188	1,208	BDL	140	NA	NA	NA	NA	2,220	1,350	2,360	NA	NA	NA
	01/15/10		12.34	89.34	BDL	59.7	370	922	196	1,118	BDL	BDL	NA	NA	NA	NA	595	BDL	2,330	NA	NA	NA
	03/18/10		8.01	93.67	BDL	BDL	50.0	248	50.3	298.3	BDL	BDL	NA	NA	NA	NA	BDL	525	666	NA	NA	NA
	06/18/10		12.55	89.13	BDL	216	698	1,510	264	1,774	BDL	131	NA	NA	NA	NA	2,950	950	2,940	NA	NA	NA
	10/05/10		12.94	00.20	BDL	880	528	1,330	314	1,644	BDL	104	NA	NA	NA	NA	1,740	926	2,360	NA	NA	NA
	04/06/11		12.10	89.58	BDI	408	/85 527	1,990	51/	2,507	BDI	233	NA	NA	NA	NA	3,000	2 240	3,/90	NA	NA	NA
	10/14/11		12.10	89.25	BDI	372	527 630	1,080	307	1,241	BDI	145	NA	NA NA	INA NA	NA	3.070	2,340 5 230	2 000	NA	INA NA	NA
	07/16/12		12.70	88.98	BDL	548	722	1,370	364	2.144	BDL	163	NA	NA	NA	NA	3.430	5.530	3 200	NA	NA	NA
	04/22/13		12.03	89.65	<2.00	155	517	1,240	306	1,546	<30.0	117	NA	NA	NA	NA	2,130	4,550	2,430	NA	NA	NA

LEGEND

BDL Below Laboratory Detection Limits

NS No Standard Published

NM Not Measured

NR Not Reported

NA Not Analyzed * Monitoring we

Monitoring well installed by previous consultant

Bolded values indicate concentrations above site applicable standards.

Note: All concentrations and standards reported in ug/L.





EXHIBIT I - RESPONSES TO PEITIONER COMMENTS ELECTRONCICALLY SUBMITTED BY THE KEY PETITIONER DRAFT PIP FORMER BOSSI SERVICE STAION 12 SWANTON STREET WINCHESTER, MA RTN 3-18598 AUGUST 5, 2013

REMSERV responses are provided in *italics* to questions received on July 29, 2013 following the closure of the comment review period for the DRAFT Pubic Involvement Plan review period.

Q4: Please elaborate on how site development will not affect the condition at the site if the development introduces a groundwater infiltration system within several feet of the contaminated soil. It is expected by us that this will significantly alter the groundwater flow rates and directions in this immediate area and change direction and flow rate of the contamination.

Ransom Environmental Consultant currently represents a potential developer and because of this their representatives were present at the group interviews and at the DRAFT PIP meeting to hear the concerns of the petitioners for future development activities. However at this point it is our understanding that the proposed property development has not yet commenced. REMSERV, Inc.is not part of this process and has not been part of or included in the design of the proposed site development scheme. Since the site development concerns are not part of the ongoing remedial response actions, until a RAM Plan is prepared by a future prospective developer for work proposed within the disposal site area, any site development work is hypothetical in nature. Site development concerns will need to be addressed if and when a RAM Plan has been prepared for site development work within the contaminated area of the site. A RAM Plan prepared by a future prospective developer would be submitted for review as part of a PIP process.

Q8: You state that the site will be found to have a condition of No Significant Risk in the near future based on the results of the risk characterization to date. However, Ransom indicated in a letter dated June 20, 2013 submitted to the Winchester Zoning Board that you intend to remediate the site using bioremediation. We are confused. Who is taking the lead here? Does that risk characterization include the Ransom data? What are the boundaries of the Disposal Site? Can you provide a copy of the risk characterization report? Who will be LSP of Record for potential remediation and management of remediation waste at the Disposal Site during/after redevelopment?

REMSERV is not aware of the recent purported reference by Ransom to bioremediation as a remedial strategy for the site. The current Licensed Site Professional (LSP) for the project, Tom Simmons, is the entity regarding the ongoing process under the MassDEP regulations. The remedial strategy implemented at the site is monitored natural attenuation (MNA). A future remedial strategy may be implemented if site development occurs and affords opportunities to access contaminated soils.

The boundary of the disposal site as it is currently configured is shown on the attached map. The risk characterization has been provided as part of the May 5, 2005Phase II Comprehensive Site Assessment Report a copy of which has been placed in the Winchester Public Library Repository and is available on the <u>www.bossipip.info</u> website. The risk characterization will be updated with any new site information obtained since the Phase II Report was filed, including the downgradient extent of petroleum products dissolved in ground water, prior to filing an RAO

Q11: You state that development is unlikely to reverse the decreasing contaminant trend. We accept that since water is diluting and biological action is reducing the contaminants and there is no new contaminant being released. However, as indicated in our question, we are more concerned with the spread of contamination. Thus, are there not development activities that would change the direction and speed of the movement of the contamination plume? What prevents the plume from spreading to the residential properties in the immediate vicinity? We have all heard the adage that the secret to pollution is dilution, but on might also argue that one person's dilution is another person's contamination. What systems are in place to protect neighbors downstream?

This development concern would be best addressed if and when a RAM Plan is prepared by a future prospective developer for future development activities within the disposal site area.

Q15: The intent of this question was to understand the sensitivity of the conclusions to the values of assumptions being used. Further the goal was to understand the level of confidence in the assumption being used. It is apparent that the testing that has been done has been limited. Thus what is the margin of error associated with the flow rate of the groundwater through the site. Further, it has been stated that this value fluctuates with the seasons. What are the values for these flow rates? What are their associated error bands?

Ground water flow direction has been mapped on 10 different dates at the site since 2007. There has not been a statistical study or assessment of the accuracy of the ground water flow rate calculations. Ground water flow rates are calculated using estimates of soil permeability properties and therefore include assumptions that are believed to be representative of the site geology. Seasonal variations in precipitation do not have an effect on soil hydraulic conductivity and therefore are less likely to affect the rate at which ground water flows. There may be an increase in the slope to the water table due to infiltration of precipitation falling on unpaved properties east of Washington Street however it is more likely that seasonal precipitation may affect the thickness of the water column in response to spring and fall recharge events. This would affect the volume of water flowing through the site as opposed the rate of ground water flow. It should be remembered that the release of gasoline occurred prior to 1998 and therefore the hydrogeologic variations in seasonal precipitation have occurred over an extended period of time. The resultant extent of dissolved contamination has already been influenced by annual and seasonal variations in ground water recharge from precipitation.

Q16: Hypothetically, how would the existing flow are be altered by an infiltration system? Similar to other questions here, would a developer be allowed to alter the existing remediation

RESPONSES TO FOLLOW UP QUESTIONS RECEIVED IN THE DRAFT PIP ELECTRONCICALLY SUBMITTED BY THE KEY PETITIONER DRAFT PIP FORMER BOSSI SERVICE STAION 12 SWANTON STREET WINCHESTER, MA RTN 3-18598 AUGUST 5, 2013

and possible closure plan and install an infiltration system? What would they have to do to justify it?

Hypothetically speaking, the affect of ground water recharge would be dependent upon several factors including the rate, frequency and volume of infiltration events. The size of the infiltration area, the soil type, the pre-existing depth to ground water the hydraulic conductivity of the existing soils the thickness of the saturated soils, the slope of the water table, etc. The questions on infiltration of rain water represent a hypothetical scenario in which REMSERV, Inc. is not involved. While future development of the site may be undertaken at some point, REMSERV is not involved in the design of a proposed development scenario and therefore is not qualified comment on the design. These development concerns would be best addressed during the review of the RAM Plan prepared by a future prospective development activities within the area of contamination.

Q19: Can you provide an estimate or rule of thumb? 1 foot of contaminant plume spread per 100 feet of water travel? 1,000 feet of water? What are the specifics for the "rate of contaminant movement"?

A rule of thumb for the ratio of contaminant spreading to plume length is generally not employed in an empirical sense. It is generally considered (non-empirically) that dissolved contaminant plumes are narrower in coarse grained deposits and oblate in finer grained soils. In other words sand and gravel deposits result in less lateral dispersion than silts and clays. The "specifics" of the rate of contaminant movement include the type of contaminant, the attenuation factors (dispersion, dilution, sorption, biodegradation, volatilization), the hydrogeologic gradient, the soil hydraulic conductivity and the aquifer porosity.

Q20: This question has not been answered. The intent was to know which samples were used to calculate the current model of the plume. Further, the specific assumptions used for these projections are desired. If this is existing in the current documentation, that is acceptable, but it has escaped my notices so far, please point to it.

The plume has not been modeled to date. The horizontal extent of the contamination has been assessed and is shown in its current depiction on the attached figure. Included in the assessment of extent are the soil contaminants, soil gas vapors along the property boundary and dissolved contaminant concentrations. Together this information has been used to estimate human health risk associated with the subsurface conditions.

New Questions:

A. What is the process that the developers must go through to change conditions at the site that effect the conclusions associated with the closing of the site? For instance, if

the site is closed because the plume is stable and decreasing in its concentrations because the site is effective capped by asphalt and the limited groundwater is flowing sideways through the site from uphill, and the development intends to install a groundwater infiltration system in the immediate vicinity of the plume, does this alter the conclusions of the closure? What must the developer do to justify the modifying the conditions that allowed the closure?

Again this question is related to a hypothetical development scenario. Future site development activities within the contaminated area would have to be proposed in a RAM Plan prepared by a future prospective developer and the opportunity to comment would be presented during a PIP process.

B. You state that a soil boring was completed as MW-2 behind the Bossi building to assess for contamination associated with the rear underground storage tank. Reportedly, the laboratory analysis did not identify petroleum in the soils or groundwater near the former UST location. However, based on you groundwater contour plan, this boring/well is located hydraulically up-gradient of the former UST. Additionally, it is our understanding that more than one data point is necessary to assess the extent of potential impact from a UST. Is there any additional data that you can provide that demonstrates the soils and groundwater in the location of the former UST and down-gradient of the former UST has been adequately assessed?

We do not have any additional soil or ground water information associated with the former heating oil tank for this location. One soil sample is usually insufficient to identify the extent of contamination once it is discovered, however, in the case of the heating oil tank no contamination was identified in the nearest soil boring and ground water monitoring well. It is my understanding from talking with the property owner that a representative from the Winchester Fire Department was present during the heating oil tank removal. The Fire Department representative has the responsibility for reporting contamination to the Mass DEP when observed during a tank removal. Since no report was made to the MassDEP it is our understanding that the Fire Department representative did not observe contamination.

C. The groundwater data table in the report shows that after approximately 12 years and 17 rounds of groundwater sampling, the groundwater quality at MW-4 remains significantly contaminated and similar to the 2000 baseline results.

In July and August 2012, Ransom Consulting, Inc, (Ransom) conducted subsurface investigations on the Bossi Property and adjoining properties (16-20 Scranton Street and 278-292 Washington Street) for proposed redevelopment of the area on behalf of Gershman Brown Crowley, Inc. and CVS Caremark Corporation. Ransom's investigation discovered that the groundwater contamination plume is about twice the

size as previously thought extending beneath the 16-20 Scranton (Swanton?) Street property and possibly beneath Scranton (Swanton?) Street.

i) Why was this not presented in your latest Class C RAO Status Report?

We have not reviewed this information.

ii) Is this new data being integrated into the Disposal Site?

We have not reviewed this information.

iii) Does this new data invalidate the 2007 Class C RAO, change the Disposal Site boundary, prompt further investigation; and require a new evaluation of risks/potential exposure pathways?

We have not reviewed this information.

iv) Does this new data require that additional investigation be performed to determine the extent of release pursuant to the Massachusetts Contingency Plan Performance Standards?

We have not reviewed this information.

v) Given that the concentrations in MW-4 have not decreased, how do you propose to achieve a Permanent Solution? What is the typical timeframe for conducting planned remediation to achieve a Permanent Solution?

The MassDEP expects to receive either a RAO, Remedy Operation Status, or Tier Classification Extension six years from the date of initial notification. This is a standard timeline and may be superseded by a timeline agreed to by the MassDEP and the Potentially Responsible Party. In 2005 both parties agreed to a site specific timeline for document submittals to the MassDEP and the Bossi Realty Trust has met this schedule. In accordance with this schedule, the Bossi Realty Trust has filed a Class C-2 RAO with the MassDEP.

The concentrations in MW-4 suggest that a stable plume has been established. A stable plume is one in which the extent of the plume is not expanding. Stable plumes are typically associated with sites where the contaminant source(s) have been removed and the dissolved contaminant boundary is no longer spreading. If a plume is stable and there is no unacceptable level of risk, a site can be closed out using a Response Action Outcome (RAO). At the Former Bossi Service Station site, the source were the leaking underground storage tank(s) removed in 1999. vi) Will any investigation be conducted beneath the Bossi building prior to or after proposed demolition?

At this time, REMSERV does not intend to collect additional data beneath the current building at 12 Swanton Street.

D. We assume you are aware of the developer's plan to install a subsurface storm water infiltration system at 16-20 Scranton (Swanton?) St., very close and potentially within the boundaries of the groundwater plume at the Disposal Site. Given the proposed location of the storm water infiltration system relative to the groundwater plume and location of the nearby residential properties, we are concerned that the storm water infiltration system will lead to higher groundwater elevations in the area and enhanced migration of subsurface contamination, including metals.

We have been made aware of this hypothetical scenario by the PIP petitioners. To date, REMSERV has not performed metals analysis on soils or ground water samples collected from the site therefore REMSERV is not aware of the source of the concern for metals expressed by the petitioners. Future site development activities within the contaminated area would have to be proposed in a RAM Plan prepared by a future prospective developer and the opportunity to comment would be presented during a PIP process.

i. Have you reviewed Ransom's data and investigation reports? Will additional investigation of the groundwater plume limits be performed in light of the developers plan for the storm water infiltrations system?

We have not reviewed this information. If the storm water infiltration system is constructed within the boundaries of the disposal site then it would likely be included within a RAM Plan prepared by a future prospective developer that would be subject to a PIP process.

> ii. As the LSP of Record, have you conducted a study or review on how the proposed infiltration system may affect the Disposal Site? What controls will be in place to prevent migration of contaminants to other properties?

I have not reviewed this information. If the storm water infiltration system is constructed within the boundaries of the disposal site then it would likely be included within a RAM Plan prepared by a future prospective developer that would be subject to a PIP process.

> iii. Have you been provided with Ransom's testing and storm water infiltration modeling reports? If so, are Ransom's findings consistent with your findings regarding subsurface conditions, soil type, and the

RESPONSES TO FOLLOW UP QUESTIONS RECEIVED IN THE DRAFT PIP ELECTRONCICALLY SUBMITTED BY THE KEY PETITIONER DRAFT PIP FORMER BOSSI SERVICE STAION 12 SWANTON STREET WINCHESTER, MA RTN 3-18598 AUGUST 5, 2013

slow groundwater recharge (in dense glacial till) document in your reports?

I have not reviewed this information. If the storm water infiltration system is constructed within the boundaries of the disposal site then it would likely be included within a RAM Plan prepared by a future prospective developer that would be subject to a PIP process.

iv. As the LSP of Record for the Disposal Site, do you agree with the hydraulic conductivity values estimated by Ransom? How do their hydraulic conductivity values compare with yours? Are their published values for hydraulic conductivity in glacial till? If so, how does Ransom's and our conductivity values compare with the published values? Do you agree with Ransom's storm water infiltration model? Do you believe that additional groundwater conductivity testing should be performed?

I have not reviewed this information. There are a range of published hydraulic conductivity values for glacial till. It is possible that hydraulic conductivity testing may occur. At present, published values have been used by REMSERV and the use of published hydraulic conductivity is an acceptable approach for estimating ground water flow rates and volumes.



EXHIBIT II - PUBLIC INVOLVEMENT PLAN SCHEDULE Former Bossi's Service Station 12 Swanton Street Winchester, MA RTN 3-18598

			PUBLIC
REPORT	STATUS	DATE	INVOLVEMENT
Phase II Comprehensive Site Plan	Completed	5/5/2005	No
Phase III Remedial Action Plan	Completed	6/11/2005	No
Phase IV Completion Report & Class C-2 Response Action Outcome	Completed	8/16/2007	No
DRAFT Public Involvement Plan	Completed	7/27/2013	Yes
Public Involvement Plan	Completed	8/5/2013	Yes
Response Action Outcome	Pending	TBD	Yes
Activity and Use Limitation	Potential	TBD	Yes

APPENDIX II - LIST OF DOCUMENTS FOR PUBLIC REVIEW WINCHESTER LIBBRART PUBLIC INFORMATION REPOSITORY PUBLIC INVOLVEMENT PLAN FORMER BOSSI SERVICE STATION 12 SWANTON STREET WINCHESTER, MA RTN 3-18598 AUGUST 15, 2013

- 1.1 April 3, 2001, Web Engineering Associates, Inc., "Immediate Response Action Completion Report", Bossi's Automotive Service, Inc.
- 1.2 May 5, 2005, REMSERV, Inc., "Phase II Comprehensive Site Assessment", 12 Swanton Street
- 1.3 July 11, 2005, REMSERV, Inc., "Phase III Remedial Action Plan", Bossi Realty Trust
- 1.4 August 16, 2007, REMSERV, Inc., "Phase IV Completion Report & Class C-2 Response Action Outcome (RAO) Statement", Bossi Realty Trust
- 1.5 May 7, 2013, REMSERV, Inc., "Post Class C-2 RAO Status Report", 12 Swanton Street
- 1.6 July 1, 2013, Site Plan
- 1.7 January 1991, Mass DEP, "Public Involvement Plan Interim Guidance For Waiver Sites", Interim Policy WSC-800-90
- August 5, 2013 "Final Public Involvement Plan", Former Bossi's Service Station, RTN 3-18598" prepared for the Bossi Realty Trust.

APPENDIX I – LIST OF PETITIONERS

LIST OF PETITIONERS AND CONTACT PERSONS Public Involvement Plan Former Bossi's Service Station 12 Swanton Street Winchester, MA RTN 3-18598

First Name	Last Name	Status	Street	Town	State	Zip
Joan	Bellino	Resident	33 Oak Street	 Winchester	MA	01890
Alexander	Blumsack	Resident	21 Chester Street	 Winchester	MA	01890
Michelle	Blumsack	Resident	21 Chester Street	 Winchester	MA	01890
D.	Cefalo	Resident	29 Oak Street	 Winchester	MA	01890
Greg	Chastain	Resident	266 Washington St.	 Winchester	MA	01890
Andrea	Corey	Resident	28 Harvard Street	 Winchester	MA	01890
Elmira	Corey	Resident	PO Box 327	 Winchester	MA	01890
Dexter	Cronin	Resident	31 Swanton Street	 Winchester	MA	01890
Joan	Cronin	Resident	31 Swanton Street	 Winchester	MA	01890
Jennifer	diBenedetto	Resident	326 Washington St.	 Winchester	MA	01890
Deborah I.	Donahue	Resident	2 Bushcliff Terrace	 Winchester	MA	01890
Leo C.	Donahue	Resident	2 Bushcliff Terrace	 Winchester	MA	01890
Randell	Drane	Key Petitioner	330 Washington St.	 Winchester	MA	01890
Christine	Drane	Resident	330 Washington St.	 Winchester	MA	01890
Heather	Eitassen	Resident	22 Grayson Road	 Winchester	MA	01890
Christine	Falkenberg	Resident	36 Oak Street	 Winchester	MA	01890
Kristen	Fitzgerald	Resident	6 Spruce Street	 Winchester	MA	01890
Paula	Harker	Resident	24 Park Road	 Winchester	MA	01890
Lanqi	Hua	Resident	296 Washinton St.	 Winchester	MA	01890
Ula	Jurkunas	Resident	19 Swanton Street	 Winchester	MA	01890
Andrea	Kennedy	Resident	30 Oak Street	 Winchester	MA	01890
Afshan	Kirmani	Resident	22 Oak Street	 Winchester	MA	01890
Erica	Kleinkopf	Resident	26 Lincoln St.	 Winchester	MA	01890
Chiwing	Lee	Resident	270 Washington St.	 Winchester	MA	01890
Leanne	Lee	Resident	77 Forest St.	 Winchester	MA	01890
Cathy	MacDonald	Resident	8 Webster street	 Winchester	MA	01890
David	McWhan	Resident	43 Oak Street	 Winchester	MA	01890
Ann	Muir	Resident	92 Church Street	 Winchester	MA	01890
John	Natale	Resident	45 Chester Street	 Winchester	MA	01890
Joe	O'Connor	Resident	4 Park Road	 Winchester	MA	01890
John	Orrall	Resident	12 Keenan Drive	 Winchester	MA	01890
Amy	Pierce	Resident	325 Washington St.	 Winchester	MA	01890
Alison	Pike	Resident	6 Park Road	 Winchester	MA	01890
Lisa	Ran	Resident	45 Swanton Street	 Winchester	MA	01890
Robert	Rose	Resident	16 Park Road	 Winchester	MA	01890
Alexander	Schusteff	Resident	35 Oak Street	 Winchester	MA	01890
Karen	Schwab	Resident	32 Oak Street	 Winchester	MA	01890
Joe	Scotti	Resident	271 Washington St.	 Winchester	MA	01890
Ann	Sera	Resident	5 Andrea Circle	 Winchester	MA	01890
Jack	Shea	Resident	163 Highland Drive	 Winchester	MA	01890
Sulan	Shediac	Resident	45 Forest Street	 Winchester	MA	01890

LIST OF PETITIONERS AND CONTACT PERSONS Public Involvement Plan Former Bossi's Service Station 12 Swanton Street Winchester, MA RTN 3-18598

First Name	Last Name	Status	Street		Town	State	Zip
Anyah	Suderman	Resident	283 Washington St.		Winchester	MA	01890
Brooke	Swearwingen	Resident	4 Bushcliff		Winchester	MA	01890
Christian M.	Тесса	Resident	312 Washinton St.		Winchester	MA	01890
Kim	Тесса	Resident	312 Washinton St.		Winchester	MA	01890
Patricia	Toro	Resident	43 Oak Street		Winchester	MA	01890
Alex & Christa	Tsiantos	Resident	7 Swanton Street		Winchester	MA	01890
Lydia Kenion	Walsh	Resident	16 Park Road		Winchester	MA	01890
Liang	Xu	Resident	79 Forest St.		Winchester	MA	01890
Christa	Xydaki	Resident	7 Swanton Street		Winchester	MA	01890
Jing	Yu	Resident	336 Washington St.		Winchester	MA	01890
Xiaowei	Zhang	Resident	79 Forest St.		Winchester	MA	01890
Karen	Stromberg	NERO PIP Coordinator	MA DEP	205B Lowell Street	Wilmington	MA	1887
Douglas	Marmon	Chair	Winchester Board of Selectmen	Town Hall Second Floor, 71 Mount Vernon Street	Winchester	MA	1891
Jennifer	Murphy	Chair	Winchester Board of Health	Town Hall, 71 Mount Vernon Street	Winchester	MA	1890
Representative Jason M.	Lewis	State Representative	State House	Room 466	Boston	MA	2133
Senator Katherine	Clark	State Senator	State House	Room 513	Boston	MA	2133
Senator Patricia D.	Jehlen	State Senator	State House	Room 313A	Boston	MA	2133

Notes:

1. Italicized enteries attended DRAFT PIP meeting on July 1, 2013

APPENDIX II

APPENDIX II - LIST OF DOCUMENTS FOR PUBLIC REVIEW WINCHESTER LIBBRART PUBLIC INFORMATION REPOSITORY PUBLIC INVOLVEMENT PLAN FORMER BOSSI SERVICE STATION 12 SWANTON STREET WINCHESTER, MA RTN 3-18598 AUGUST 15, 2013

- 1.1 April 3, 2001, Web Engineering Associates, Inc., "Immediate Response Action Completion Report", Bossi's Automotive Service, Inc.
- 1.2 May 5, 2005, REMSERV, Inc., "Phase II Comprehensive Site Assessment", 12 Swanton Street.
- 1.3 July 11, 2005, REMSERV, Inc., "Phase III Remedial Action Plan", Bossi Realty Trust.
- 1.4 August 16, 2007, REMSERV, Inc., "Phase IV Completion Report & Class C-2 Response Action Outcome (RAO) Statement", Bossi Realty Trust.
- 1.5 May 7, 2013, REMSERV, Inc., "Post Class C-2 RAO Status Report", 12 Swanton Street.
- 1.6 July 1, 2013, Site Plan.
- 1.7 January 1991, Mass DEP, "Public Involvement Plan Interim Guidance For Waiver Sites", Interim Policy WSC-800-90.
- June 27, 2013 "DRAFT Public Involvement Plan", Former Bossi's Service Station, RTN 3-18598" prepared for the Bossi Realty Trust.
- 2.1 August 5, 2013 "Public Involvement Plan", Former Bossi's Service Station, RTN 3-18598" prepared for the Bossi Realty Trust.

APPENDIX III – SERIES PLOTS

MW-1 Contaminant Concentrations vs.Time Bossi Realty Trust 12 Swanton Street Winchester, MA RTN 3-18598



GW-2 = 7,000 ug/L C9-C10 Aromatics GW-2 = 5,000 ug/L C9-C12 Aliphatics



B104-MW Contaminant Concentrations vs. Time **Bossi Realty Trust** 12 Swanton Street Winchester, MA GW-3 = 50,000 ug/L C9-C12 Aliphatics RTN 3-18598

C5-C8 Aliphatics



B103-MW Contaminant Concentrations vs.Time Bossi Realty Trust 12 Swanton Street Winchester, MA RTN 3-18598



GW-3 = 30,000 ug/L Naphthalene 18,000 16,000 C9-C12 Aliphatics 14,000 - Naphthalene 12,000 Concentration (ug/L) 10,000 8,000 GW-2 C9-C10 Aromatics 6,000 GW-2 C9-C12 Aliphatics 4,000 GW-2 C5-C8 2,000 Aliphatics **GW-2** Naphthalene 0

B102B-MW Contaminant Concentrations vs. Time Bossi Realty Trust 12 Swanton Street Winchester, MA RTN 3-18598 GW-3 = 50,000 ug/L C9-C12 Aliphatics

C5-C8 Aliphatics



B101-MW Contaminant Concentrations vs. Time Bossi Realty Trust 12 Swanton Street Winchester, MA RTN 3-18598



GW-2 = 7,000 ug/L C9-C10 Aromatics



MW-4 Contaminant Concentrations Vs. Time Bossi Realty Trust 12 Swanton Street Winchester, MA RTN 3-18598

