

ENVIRONMENTAL
SERVICES



ENGINEERING
SERVICES

IMMEDIATE RESPONSE ACTION
INITIAL STATUS REPORT
RELEASE TRACKING NUMBER 3-34474

RIVER'S EDGE DEVELOPMENT

484 BOSTON POST ROAD
WAYLAND, MASSACHUSETTS

DECEMBER 8, 2017

PREPARED FOR:

WAYLAND BOARD OF SELECTMEN
% TOWN ADMINISTRATOR NANNETTE F. BALMER
41 COCHITUATE ROAD
WAYLAND, MA 01778

PREPARED BY:

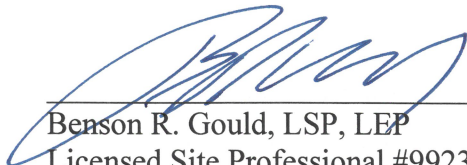
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CMG ID 2017-160

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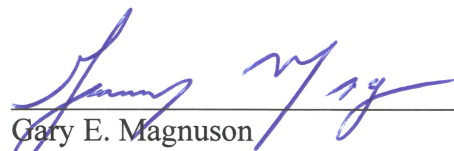
The undersigned employees of CMG Environmental, Inc. (CMG) prepared and reviewed this report. Please direct any requests for additional information regarding the content of this document to these individuals.



Benson R. Gould, LSP, LEP
Licensed Site Professional #9923

December 8, 2017

Date



Gary E. Magnuson
Principal

12-8-2017

Date

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1.0 INTRODUCTION

CMG Environmental, Inc. (CMG) has prepared this Immediate Response Action (IRA) Status Report for a portion of the property located at 484 Boston Post Road in Wayland, Massachusetts (the Property). Figure 1 (Site Location Map) depicts the Property in relation to streets and other topographic features.

This IRA Status Report addresses release tracking number (RTN) 3-34474. CMG followed regulations set forth by the Massachusetts Department of Environmental Protection (DEP) in the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000) in preparing this IRA Status Report.

1.1 PURPOSE

The purpose of an IRA is to address urgent releases or threats of release at a ‘disposal site’¹ that trigger two-hour notifications pursuant to 310 CMR 40.0311 or 40.0312, or 72-hour notifications per 40.0313 or 40.0314.

The purpose of an IRA Status Report is to document IRA activities completed since submittal of the last IRA Report (in this case, the 10/9/17 IRA Plan), in accordance with 310 CMR 40.0425.

1.2 SITE LOCATION & IDENTIFICATION

The Property is located at 484 Boston Post Road, Wayland MA 01778-1831. Boston Post Road is a portion of U.S. Route 20. The Property is on the northerly side of Route 20, approximately ½ mile west of its intersection with Andrew Avenue (at the Wayland Town Center development) and 0.3 miles west of the Sudbury River. It also abuts the neighboring town of Sudbury.

The Property consists of parcels of land identified on Wayland Assessor’s Map 22 as Lots 22-3 (7.63 acres), 22-4 (15 acres), 22-5 (24 acres), 22-6 (4.5 acres), and 22-7 (1.0 acre). The Town of Wayland has designated Lot 22-6, Lot 22-7, and the southerly half of Lot 22-3 as the planned “River’s Edge” development (which comprises approximately 7 acres of land).

CMG defines “the Site” (disposal site) as a large (estimated at 32,000 yd³) soil stockpile located principally on Lot 22-6, amassed over many years by the Town of Wayland Highway Department from roadway maintenance. The Site is at 42°21'51" north latitude (42.36413 °N), 71°22'55" west longitude (-71.38208 °E). The UTM (Universal Transverse Mercator) coordinates in the middle of the Site are 4,692,955 meters north and 303,845 meters east in Zone 19.

CMG has appended Figure 2 (Existing Conditions Aerial Photograph) and Figure 3 (Sample Location Plan) prepared by The Vertex Companies, Inc. (Vertex) to this IRA Plan. These figures each depict an “Approximate Area of Identified ACWM” (asbestos-containing waste material) near the apex of the large soil stockpile. CMG considers this area to be the approximate limits of the RTN 3-34474 ‘disposal site.’

¹ Defined at 310 CMR 40.0006 as “any structure, well, pit, pond, lagoon, impoundment, ditch, landfill or other place or area, excluding ambient air or surface water, where uncontrolled oil and/or hazardous material [OHM] has come to be located as a result of any spilling, leaking, pouring, abandoning, emitting, emptying, discharging, injecting, escaping, leaching, dumping, discarding or otherwise disposing of such [OHM].”

1.3 CURRENT PROPERTY OCCUPANTS & USES

The Lot 22-3 portion of the Property includes the First Student, Inc. parking area for Town of Wayland school buses. It also includes a former municipal wastewater treatment plan, a defunct firing range which the Wayland Police Department had used, and undeveloped wooded areas. The Lot 22-6 portion of the Property (formerly known as the Wayland Public Works Staging Yard) includes the majority of the large soil stockpile. It also contains undeveloped wooded areas, a dirt-paved parking area, and driveways. The Lot 22-7 portion of the Property includes a small part of the large soil stockpile. It also contains undeveloped wooded areas and the exit for the access drive to the Wayland Transfer Station (which is located primarily on Lot 22-4).

1.4 RELEASE NOTIFICATION [40.0311]

Vertex is supervising characterization of the large soil stockpile located on Lots 22-6 and 22-7 at the Property. In August 2017 Vertex had this stockpile partially graded into a more manageable configuration to allow sampling for waste classification or potential reuse. On August 8, 2017 Vertex observed suspect ACWM (pieces of 3-4" diameter transite pipe, vinyl floor tile) near the top of the stockpile and halted grading activities. They collected six samples of this material on August 10, 2017 and submitted these for asbestos analysis using polarized light microscopy (PLM) methodology. Five of the six samples contained >1% asbestos.

Vertex met with Wayland Town Engineer Paul Brinkman, Mr. Peter Seward of the DEP Bureau of Air and Waste, and CMG at the Property on August 14, 2017 to discuss these findings. At that time we concluded there was greater than the reportable quantity (1 pound) of asbestos contained in the ACWM separated out of the soil stockpile. Therefore the "release" of asbestos had the potential to pose an Imminent Hazard, and thus triggered a two-hour notification requirement per 310 CMR 40.0311(7). Mr. Brinkman verbally notified the DEP Bureau of Waste Site Cleanup of this finding at 6:40 p.m. on August 14, 2017.

1.5 IRA APPROVAL

Mr. Brinkman spoke with Sean Griffin of DEP, who forwarded this information to the DEP Northeast Region Asbestos Group. Chief John MacAulay of the Asbestos Group later spoke with Mr. Brinkman and advised him that Site IRA activities would be subsumed under an asbestos Work Plan.

CMG prepared a written IRA Plan for RTN 3-34474, which the Town of Wayland submitted via eDEP on October 12, 2017, that documented the verbal IRA Plan approved by DEP (Bureau of Waste Site Cleanup). CMG deemed this IRA Plan tacitly approved on November 2, 2017 following completion of the 21-day presumptive approval period set forth at 310 CMR 40.0420(9), since DEP did not issue any written denial of our plan during this interval. We note that all Site IRA activities will be conducted under a Non-Traditional Asbestos Work Plan (NTAWP) approved by the DEP Bureau of Air and Waste.

Vertex has prepared said NTAWP on behalf of their client Wood Partners, LLC. The Town of Wayland selected Wood Partners, LLC as developer for the River's Edge project. Thus Vertex (not CMG) will conduct or provide direct supervision of ACWM identification, segregation, containment, and proper disposal at the Site.

CMG will compile information provided by Vertex and prepare MCP submittals on behalf of the Town of Wayland, which we believe will culminate in an IRA Completion and Permanent Solution Report for RTN 3-34474.

1.6 POTENTIALLY RESPONSIBLE PARTY INFORMATION

PRP² Name: Town of Wayland
Town Building
41 Cochituate Road
Wayland, MA 01778-2614

Contact: Paul Brinkman, P.E.
Town Engineer
66 River Road
Wayland, MA 01778-1829
508-358-6852

2.0 RESPONSE ACTION STATUS [40.0425]

The MCP requires submittal of an initial written IRA Status Report within 120 days of the date that the person conducting IRA activities first notified DEP of their intention to conduct an IRA. As noted in Section 1.4 above, Mr. Brinkman verbally notified DEP of the Town of Wayland's intention to conduct an IRA at the time of release notification, on August 14, 2017. Therefore, the MCP mandates that Wayland submit this initial IRA Status Report to DEP on or before December 12, 2017.

2.1 IRA ACTIVITIES CONDUCTED SINCE IRA PLAN SUBMITTAL [40.0425(3)(a)]

Neither the Town of Wayland, Wood Partners, LLC, Vertex, nor CMG have conducted any IRA activities for RTN 3-34474 at the Site during the Initial IRA Status Report period (10/13/17 through 12/12/17).

2.2 SIGNIFICANT NEW INFORMATION OR DATA [40.0425(3)(b)]

CMG has not obtained any significant new information or data since submittal of our IRA Plan on October 12, 2017.

2.3 REMEDIATION WASTE [40.0425(3)(c)]

The Town of Wayland did not generate any remediation waste during the initial IRA Status Report period.

2.4 REMEDIATION SYSTEM MONITORING DATA [40.0425(3)(d)]

Neither the Town of Wayland, Wood Partners, LLC, Vertex, nor CMG have operated any remedial systems at the Site to date.

² "PRP" = Potentially Responsible Party, defined at 310 CMR 40.0006 as "a person who is potentially liable pursuant to M.G.L. c. 21E" (Massachusetts General Law Chapter 21E, the Massachusetts Oil and Hazardous Material Release Prevention Act).

2.5 MITIGATION OF CRITICAL EXPOSURE PATHWAY [40.0425(5)]

The MCP defines Critical Exposure Pathway (CEP) at 310 CMR 40.0006(12) as:

... those routes by which [OHM] released at a disposal site are transported, or are likely to be transported, to human receptors via:

- (a) vapor-phase emissions of measurable concentrations of [OHM] into the living or working space of a pre-school, daycare, school or occupied residential dwelling; or
- (b) ingestion, dermal absorption or inhalation of measurable concentrations of [OHM] from drinking water supply wells located at and servicing a pre-school, daycare, school or occupied residential dwelling.

CMG has conducted sufficient investigation to determine that no CEP currently exists as a result of the RTN 3-34474 release.

2.6 ADDITIONAL INFORMATION [40.0425(3)(d)]

CMG is not aware of any additional information requested by DEP regarding the IRA for RTN 3-34474.

2.7 LICENSED SITE PROFESSIONAL (LSP) OPINION [40.0425(3)(e)]

CMG prepared a Form BWSC105 [“Immediate Response Action (IRA) Transmittal Form”] using the eDEP electronic submittal system. Section E of this form presents the LSP Opinion regarding this IRA Status Report for RTN 3-34474. Section I of this form presents the certification required by 310 CMR 40.0425(3)(e). CMG has attached a .pdf copy of this IRA Status Report to the Form BWSC105 submitted electronically.

3.0 LIMITATIONS & CONDITIONS

3.1 METHODOLOGY

CMG Environmental, Inc. followed guidelines set forth by the DEP in the MCP and employed a “level of diligence reasonably necessary to obtain the quantity and quality of information adequate to assess” the disposal site in accordance with the Response Action Performance Standard promulgated at 310 CMR 40.0191.

Moreover, CMG followed guidelines set forth by DEP in the MCP. We specifically complied with IRA requirements set forth at 310 CMR 40.0410 through 40.0429.

3.2 SCOPE OF SERVICES

Wayland Town Administrator Nannette F. Balmer authorized CMG to oversee IRA activities for RTN 3-34474 on behalf of the Town of Wetland (including preparation of this initial IRA Status Report) on August 14, 2017. We performed the following scope of services between October and December 2017:

- Prepared an IRA Status Report transmittal form for the Town of Wayland’s electronic certification and eDEP submittal; and
- Prepared this IRA Status Report.

3.3 GENERAL LIMITATIONS

The Town of Wayland is relying upon Vertex to comply with 310 CMR 7.00 (the Massachusetts Air Pollution Control Regulation), 310 CMR 18.00 & 19.00 (Massachusetts Solid Waste Regulations) and their NTAWP in conducting asbestos identification, encapsulation, abatement, and proper disposal ancillary to the IRA for RTN 3-34474.

CMG conducted IRA response actions in accordance with generally accepted engineering and hydrogeologic practices. CMG makes no other warranty, express or implied. CMG cannot provide absolute assurance that we have identified any and all recognized environmental conditions (including DEP reportable conditions) at the Site.

Where CMG included visual or other observations in this report, they represent conditions visibly and/or physically observed at the time of the inspection, or verified through interviewing or by record review, and may not be indicative of past or future Site conditions.

Please be advised that environmental conditions at the disposal site and surrounding properties may change in time. CMG does not render an opinion as to environmental conditions at the Property that change after the date of the environmental studies reported herein.

3.4 SPECIFIC CONDITIONS OF THE IRA STATUS REPORT

CMG based the conclusions of this report, in large part, on information provided by the client, their agents, or third parties, including state or local officials. CMG assumes no responsibility for the accuracy and completeness of this information.

CMG based the conclusions discussed herein solely and in reliance upon information collected during activities detailed in our Scope of Services (see Section 3.2 above).

Vertex's investigation included the collection and laboratory PLM analysis of suspect ACWM samples from a limited number of locations at the Property. However, neither Vertex nor CMG intend this study to be a definitive investigation of subsurface conditions at the Property. Vertex restricted the scope of services for this investigation due to time and/or cost constraints, and though they did undertake a limited amount of analytical testing, currently unrecognized subsurface conditions may exist at the Property. Increasing exploration (such as placement of test pits, completion of additional soil borings with subsequent collection of soil samples for laboratory analysis, installation of additional groundwater monitoring wells with subsequent collection of groundwater samples for laboratory analysis, and conducting surface geophysical survey techniques) may better delineate subsurface conditions.

CMG's Site inspection included observing the Property and surrounding area. However not all boundaries were clearly delineated, making it difficult to distinguish certain Property features from those of the surrounding area. Therefore, the location of certain Property features described in this Report and depicted on the figures may be approximate.

3.5 RELIANCE

CMG prepared this IRA Status Report for the sole use of the Town of Wayland, its successors and assigns to address DEP reporting obligations regarding assessment and remediation activities associated with RTN 3-34474. CMG does not authorize use of this information by others for any reason, except with our prior written consent.

4.0 REFERENCES

INTERVIEWS

Wayland Town Engineer Paul Brinkman, P.E.: several occasions including August 14, 2017.

The Vertex Companies, Inc.: Senior Project Manager William J. Gibbons, P.G., LSP August 14, 2017.

Massachusetts DEP, Bureau of Air and Waste: Environmental Analyst and Asbestos Inspector Peter C. Seward August 14, 2017.

WAYLAND

Assessor's Office: available online records reviewed August and October 2017.

MASSACHUSETTS

Department of Environmental Protection: Cleanup Sites Search, records reviewed online September 26, 2017 at <http://db.state.ma.us/dep/cleanup/sites/search.asp>.

Department of Environmental Protection: Massachusetts Contingency Plan regulations (310 CMR 40.0000), April 25, 2014 revision.

Division of Water Pollution Control regulations (314 CMR 4.00): December 27, 1996 revision.

Geographic Information Systems: MassDEP Priority Resource Map Viewer information downloaded October 6, 2017 from <http://maps.massgis.state.ma.us/21E/viewer.htm>.

UNITED STATES

Geological Survey: "Natick, Massachusetts" 7.5×15-minute metric series topographic quadrangle, dated 1987.

PREVIOUS ENVIRONMENTAL REPORTS

The Vertex Companies, Inc.: "Non-Traditional Asbestos Work Plan" draft September 20, 2017.

Tighe & Bond, Inc.: "Phase I Environmental Site Assessment and Limited Phase II Investigation Report" for the former Route 20 Septage Site (484-490 Boston Post Road), October 2012.

CMG Environmental, Inc.: "Immediate Response Action Plan" for RTN 3-34474 dated October 9, 2017.

FIGURES

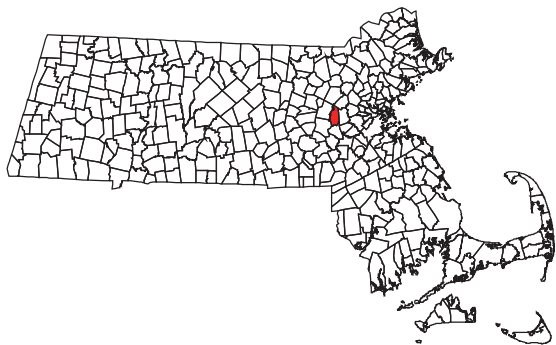
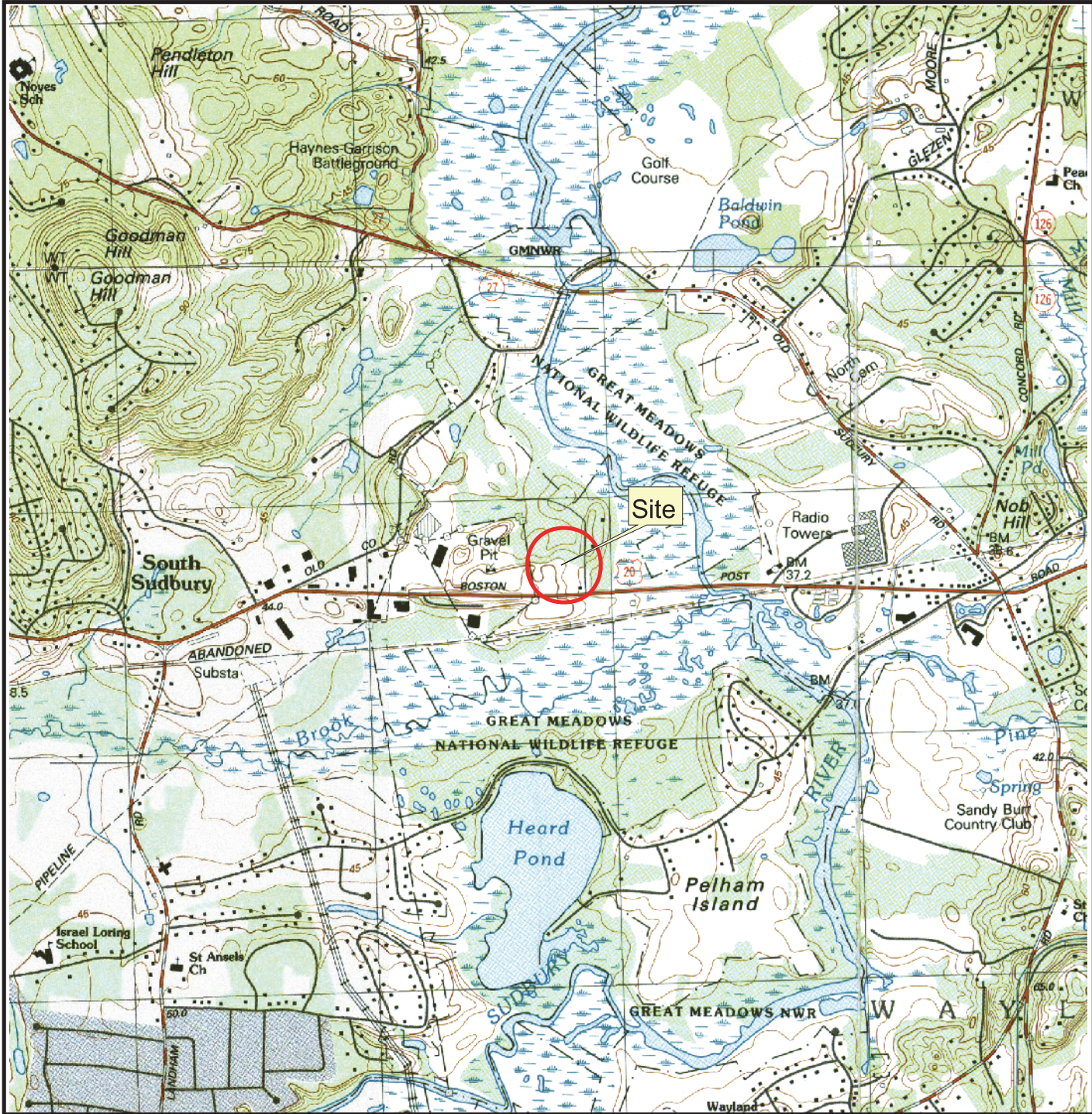
FIGURE 1 – SITE LOCATION

VERTEX* FIGURE 2 – EXISTING CONDITIONS AERIAL PHOTOGRAPH

VERTEX* FIGURE 3 – SAMPLE LOCATION PLAN

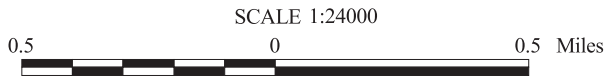
FIGURE 4 – PRIORITY RESOURCE MAP

*Figure 2 and Figure 3 prepared by The Vertex Companies, Inc. (Boston MA)



TOWN LOCATION - WAYLAND, MA

FIGURE 1
SITE LOCATION
 484 Boston Post Road
 Wayland, Massachusetts
 CMG ID 2017-160



ENVIRONMENTAL SERVICES **CMG** EST. 2002 ENGINEERING SERVICES
 67 HALL ROAD, STURBRIDGE MA 01566



Google Maps



VERTEX
1 CONGRESS STREET, 10TH FL.
BOSTON, MA 02114
617.275.5407

VERTEXENG.COM

REVISIONS

File No.:	NA	FIGURE
Date:	09/15/2017	
Drawn:	FC	2
Checked:	WJG	
Job No.:	46047	

EXISTING CONDITIONS AERIAL PHOTOGRAPH
FORMER PUBLIC WORKS STAGING YARD
484-490 Boston Post Road
Wayland, Massachusetts



AMMUNITION STORAGE TRAILERS

FIRING RANGE

ACWM AND ASSOCIATED SOIL TEMPORARY STORAGE AREA

STORAGE BINS

BUS PARKING / FORMER WASTEWATER TREATMENT PLANT

Test Pit #1
Test Pit #3
Test Pit #6

TP-4
Test Pit #4

Test Pit #5

Test Pit #2
TP-2

TP-1

TP-6

APPROXIMATE AREA OF IDENTIFIED ACWM



CONCRETE DEBRIS PILE

ORIGINAL EXTENT OF SOIL STOCKPILE

CURRENT EXTENT OF SOIL STOCKPILE

TRANSFER STATION ACCESS ROAD

LEGEND:

-  ORIGINAL LOCATION OF SOIL WITHIN STOCKPILE
-  SOIL SAMPLE LOCATION



SCALE: 1" = 50'-0"
(WHEN PRINTED AT 11x17)

VERTTEKX
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BOSTON, MA 02114
617.275.5407

VERTEXENG.COM

REVISIONS

NO.	DATE	DESCRIPTION

File No.:	NA	FIGURE	3
Date:	09/15/2017	FC	
Drawn:	WJG	WJG	
Checked:	WJG	WJG	
Job No.:	46047		

SAMPLE LOCATION PLAN
 FORMER PUBLIC WORKS STAGING YARD
 484-490 Boston Post Road
 Wayland, Massachusetts

Z:\Shared\Projects\...46047.River's Edge - Wayland\NTWP

MassDEP - Bureau of Waste Site Cleanup

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

Site Information:

RIVER'S EDGE DEVELOPMENT
484 BOSTON POST ROAD WAYLAND, MA
3-00034474

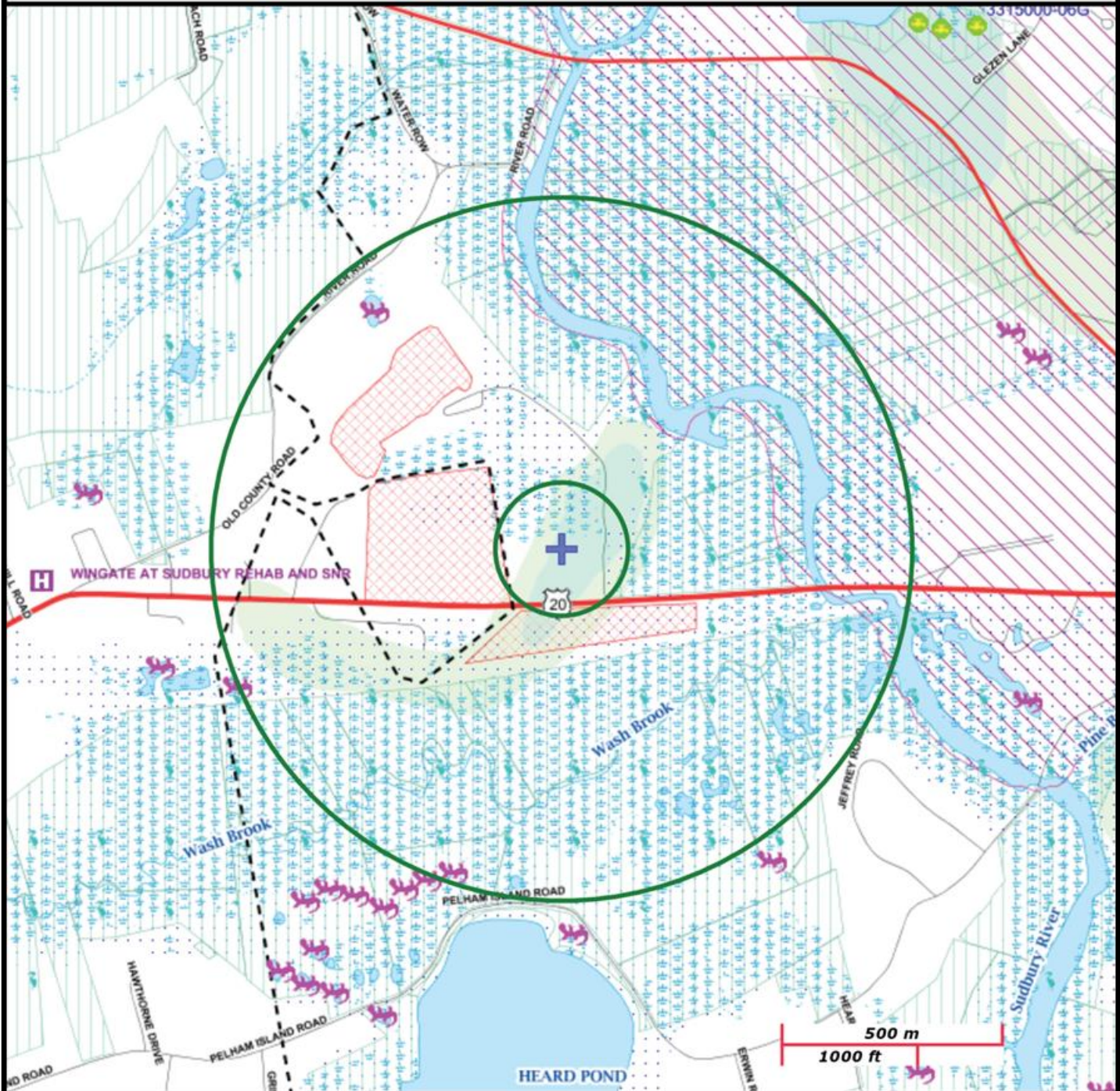
NAD83 UTM Meters:
4692950mN, 303850mE (Zone: 19)
October 6, 2017

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



MassDEP

Commonwealth of Massachusetts
Department of Environmental Protection



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

FIGURE 4: PRIORITY RESOURCE MAP
484 BOSTON POST ROAD, WAYLAND MA
CMG ID 2017-160