

ENVIRONMENTAL
SERVICES



ENGINEERING
SERVICES

IMMEDIATE RESPONSE ACTION
STATUS REPORT #5
RELEASE TRACKING NUMBER 3-34474

RIVER'S EDGE DEVELOPMENT

484 BOSTON POST ROAD
WAYLAND, MASSACHUSETTS

DECEMBER 10, 2019

PREPARED FOR:

WAYLAND BOARD OF SELECTMEN
% TOWN ADMINISTRATOR LOUISE MILLER
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WAYLAND, MA 01778

PREPARED BY:

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SIGNATURE OF REPORT AUTHORS

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.



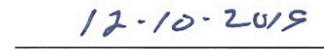
Benson R. Gould, LSP, LEP
Licensed Site Professional #9923



Date



Gary E. Magnuson
Principal



Date

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1.0 INTRODUCTION

CMG Environmental, Inc. (CMG) has prepared this Immediate Response Action (IRA) Status Report for 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 6/11/19 IRA Status Report #4), 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 (approximately 34,000 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.

Figure 2 (Assessor’s Map) shows the Property in relation to existing lot boundaries, and Figure 3 (Property Plan) illustrates Property details along with all known Site sampling locations. Figure 3 also depicts 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 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 plant, 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]

The Vertex Companies, Inc. (Vertex) of Boston, Massachusetts 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 is being 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) is conducting (or providing direct supervision of) ACWM identification, segregation, containment, and proper disposal at the Site.

The DEP Bureau of Air and Waste, Asbestos Section issued written (email) approval for the NTAWP on November 26, 2018 subject to the following conditions:

1. File an ANF001 utilizing approval number NNT18170 and waiver number NAW1811399.
2. MassDEP requires pre-abatement and post-abatement inspections. Work shall not start until the MassDEP pre-inspection has been conducted.
3. Provide advance notice to schedule the required inspections. Scheduling of such inspections will be determined by MassDEP availability.
4. All requirements of the NTWP must be onsite, set-up, and in place at the time of the MassDEP pre-inspection.
5. MassDEP shall be notified immediately if the perimeter air monitoring results reach or exceed 0.010 f/cc. All air monitoring results shall be emailed on a daily basis to: NERO.Asbestos@mass.gov.
6. If visible emissions are observed work must cease and MassDEP shall be notified immediately.
7. The primary hauler of the Asbestos Containing Waste Material (ACWM) shall be W.L. French of North Billerica, MA. The final disposal facility for the ACWM shall be Waste Management Turnkey Landfill located in Rochester, NH.
8. Copies of Waste Shipment Records (asbestos WSRs) shall be provided to MassDEP on the day the waste leaves the site for disposal.
9. The final visual clearance documentation that is conducted by the project monitor shall be provided to MassDEP.

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 additional IRA Status Reports every six months following submittal of the first such report. The Town of Wayland has submitted the following IRA Status reports for RTN 3-34474:

- Initial IRA Status Report on December 11, 2017;
- IRA Status Report #2 on June 11, 2018;
- IRA Status Report #3 on December 14, 2018; and
- IRA Status Report #4 on June 12, 2019.

This report is the fifth IRA Status Report for RTN 3-34474.

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).

2.1 IRA ACTIVITIES CONDUCTED SINCE PREVIOUS STATUS REPORT [40.0425(3)(a)]

Neither the Town of Wayland, Vertex, nor any other party has conducted activities at the Site during the subject IRA Status period (June 13 through December 10, 2019).

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

Vertex prepared a report titled “Phase I Environmental Site Assessment & Phase II Limited Site Investigation” regarding the Property dated August 7, 2019. This report identified several 120-day reportable conditions at the Property. The Town of Wayland reported these RCS-1 and RCGW-1 exceedances via DEP on December 2, 2019 and DEP subsequently issued new RTN 3-36013 to identify them.

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

Neither the Town of Wayland nor any other party has transported any remediation waste associated with RTN 3-34474 from the Property since December 10, 2018. A small amount of apparent Transite and suspect ACBM remains securely stockpiled at the Property awaiting laboratory analysis and transport for proper off-Site disposal.

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

Neither the Town of Wayland, Vertex, nor any other party has operated any remedial systems at the Site to date.

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 exists as a result of the RTN 3-34474 release.

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

CMG is are 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

Former Wayland Town Administrator Nannette F. Balmer authorized CMG to oversee IRA activities for RTN 3-34474 on behalf of the Town of Wayland (including preparation of this IRA Status Report) on August 14, 2017. We performed the following scope of services between June and December 2019:

- Discussed IRA investigation and remediation activities which Vertex conducted at the Site with Wayland Town Engineer Paul Brinkman;
- Reviewed pertinent available information provided to us by the Town of Wayland;
- Prepared an IRA Status Report transmittal form for the Town of Wayland’s electronic certification and eDEP submittal; and
- Prepared IRA Status Report.

3.3 GENERAL LIMITATIONS

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 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

WAYLAND

Town Engineer Paul Brinkman: emails and telephone conversations June-December 2019.

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

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.

Tighe & Bond, Inc.: memorandum re: “Former Wayland-Sudbury Septage Facility Groundwater Summary – August 2015 Sampling Event” dated September 2, 2015.

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

The Vertex Companies, Inc.: (final) “Non-Traditional Asbestos Work Plan” dated November 16, 2018.

The Vertex Companies, Inc.: letter re: “River’s Edge Summary of Asbestos Response Actions” dated June 13, 2019.

The Vertex Companies, Inc.: “Phase I Environmental Site Assessment & Phase II Limited Site Investigation” dated August 7, 2019.

CMG Environmental, Inc. Immediate Response Action reports for RTN 3-34474:

- IRA Plan dated October 9, 2017;
- Initial IRA Status Report dated December 8, 2017;
- IRA Status Report #2 dated June 11, 2018; and
- IRA Status Report #3 dated December 14, 2018; and
- IRA Status Report #4 dated June 12, 2019.

CMG Environmental, Inc.: “Phase I – Initial Site Investigation” for RTN 3-34474 dated August 14, 2018.

FIGURES

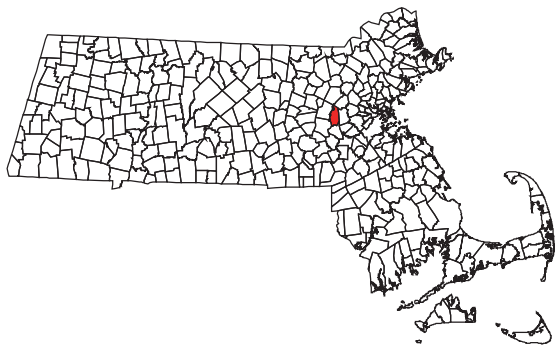
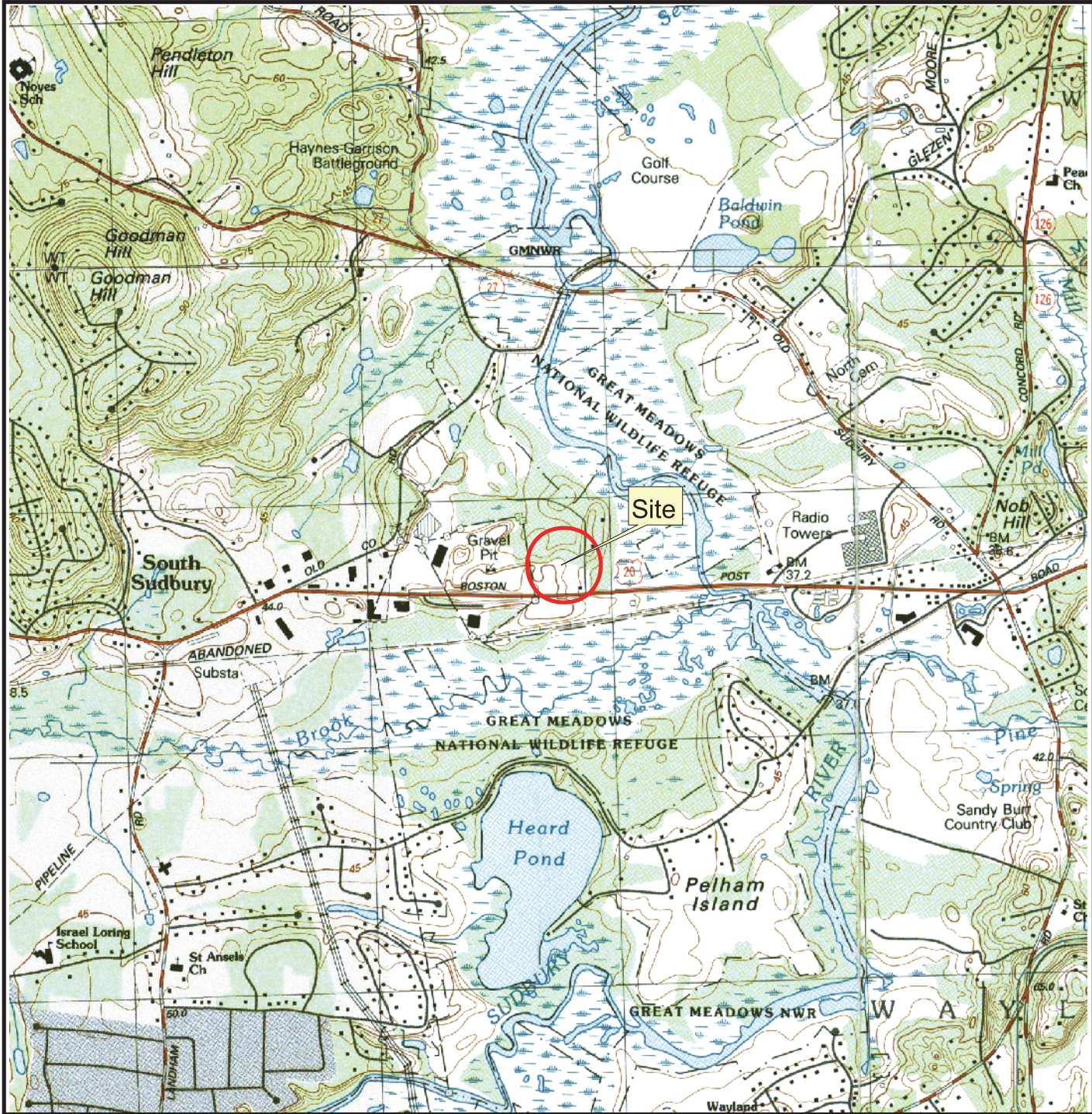
FIGURE 1 – SITE LOCATION

FIGURE 2 – ASSESSOR'S MAP

FIGURE 3 – PROPERTY PLAN

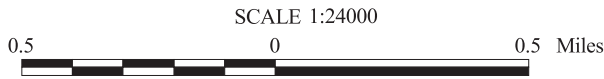
FIGURE 4 – PRIORITY RESOURCE MAP

VERTEX FIGURE 3 – STOCKPILE GRID LAYOUT



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

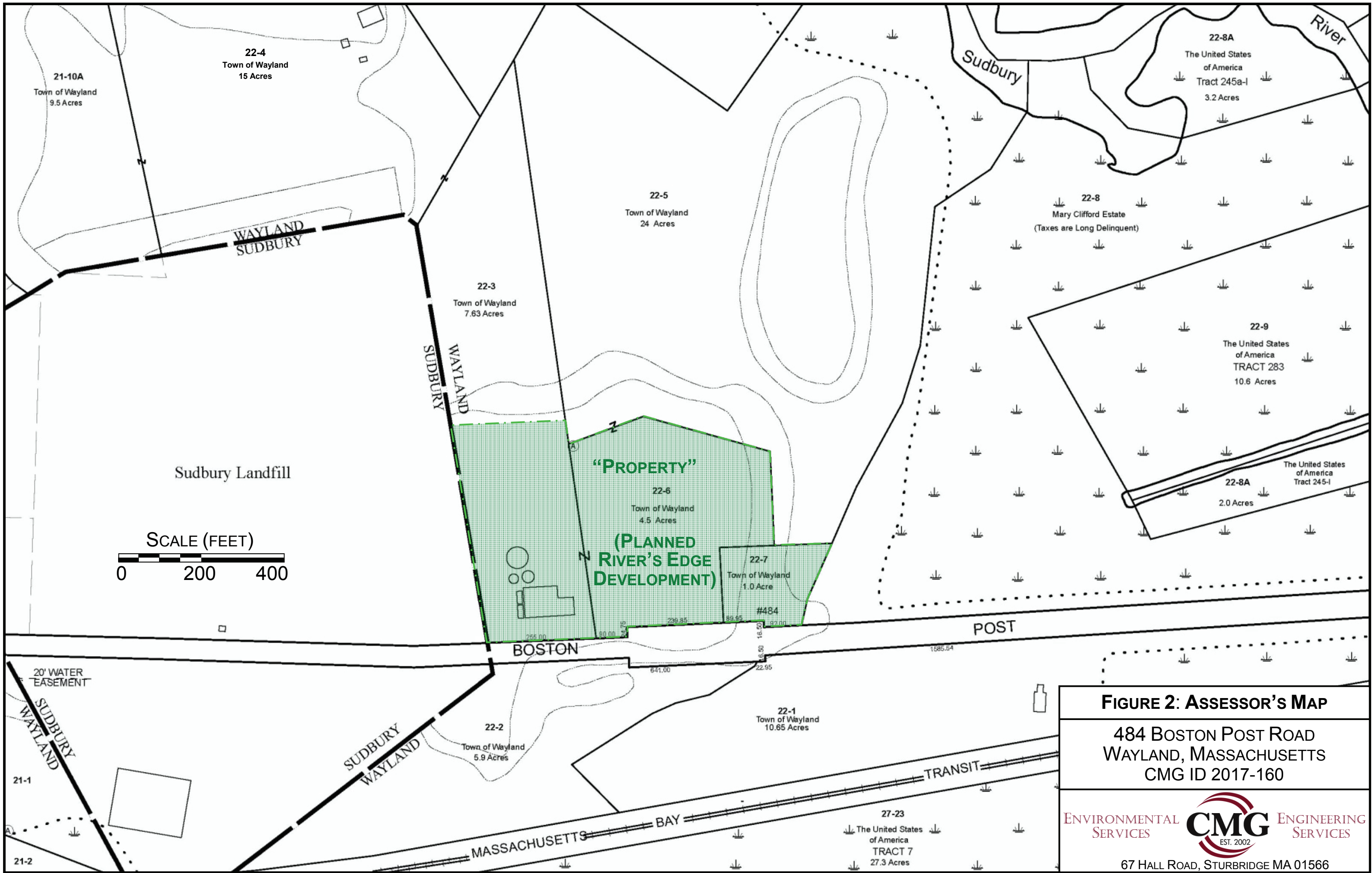


FIGURE 2: ASSESSOR'S MAP

**484 BOSTON POST ROAD
WAYLAND, MASSACHUSETTS
CMG ID 2017-160**

ENVIRONMENTAL SERVICES **CMG** EST. 2002 ENGINEERING SERVICES

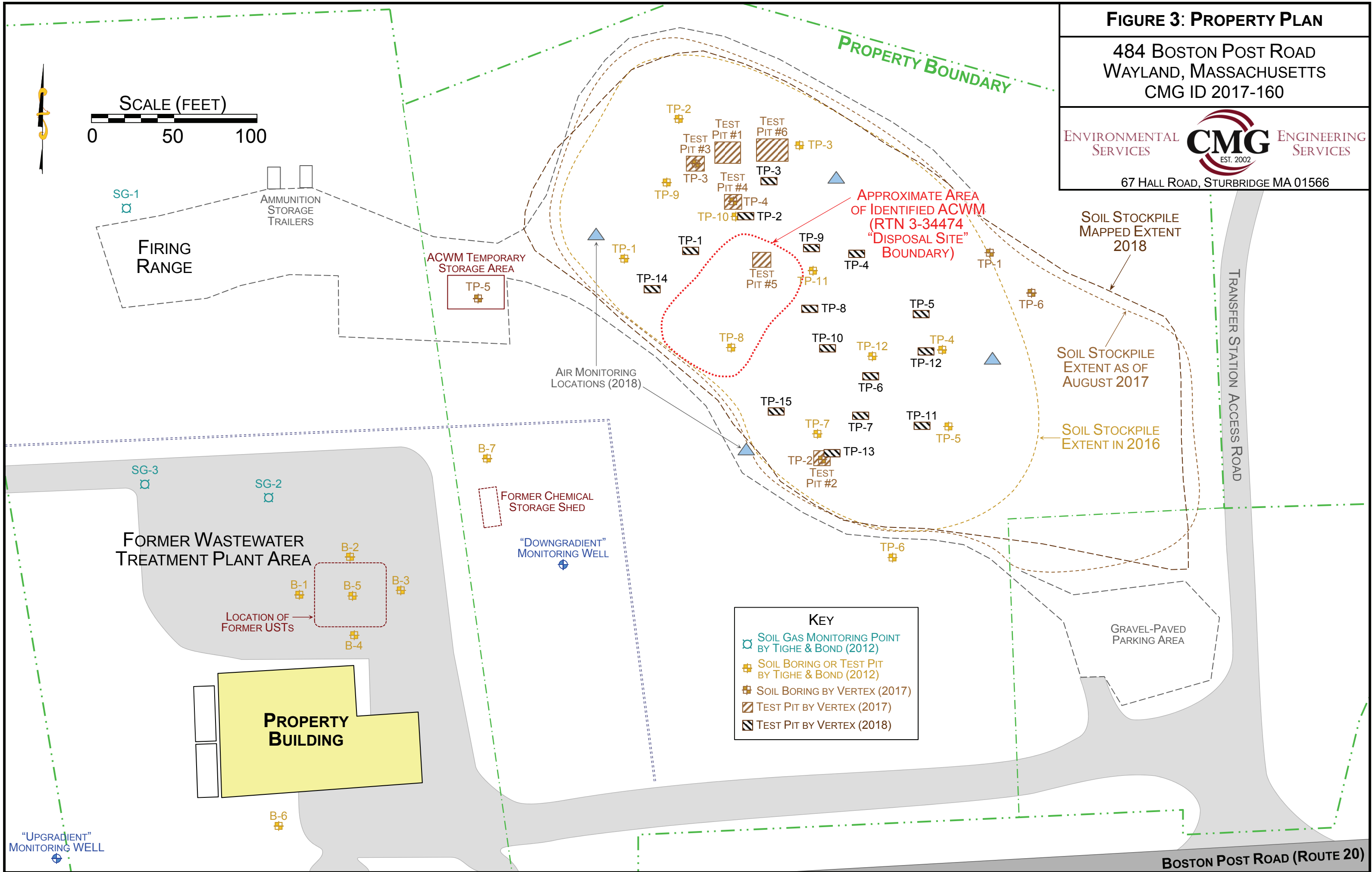
67 HALL ROAD, STURBRIDGE MA 01566

FIGURE 3: PROPERTY PLAN

484 BOSTON POST ROAD
WAYLAND, MASSACHUSETTS
CMG ID 2017-160

ENVIRONMENTAL SERVICES **CMG** EST. 2002 ENGINEERING SERVICES

67 HALL ROAD, STURBRIDGE MA 01566



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

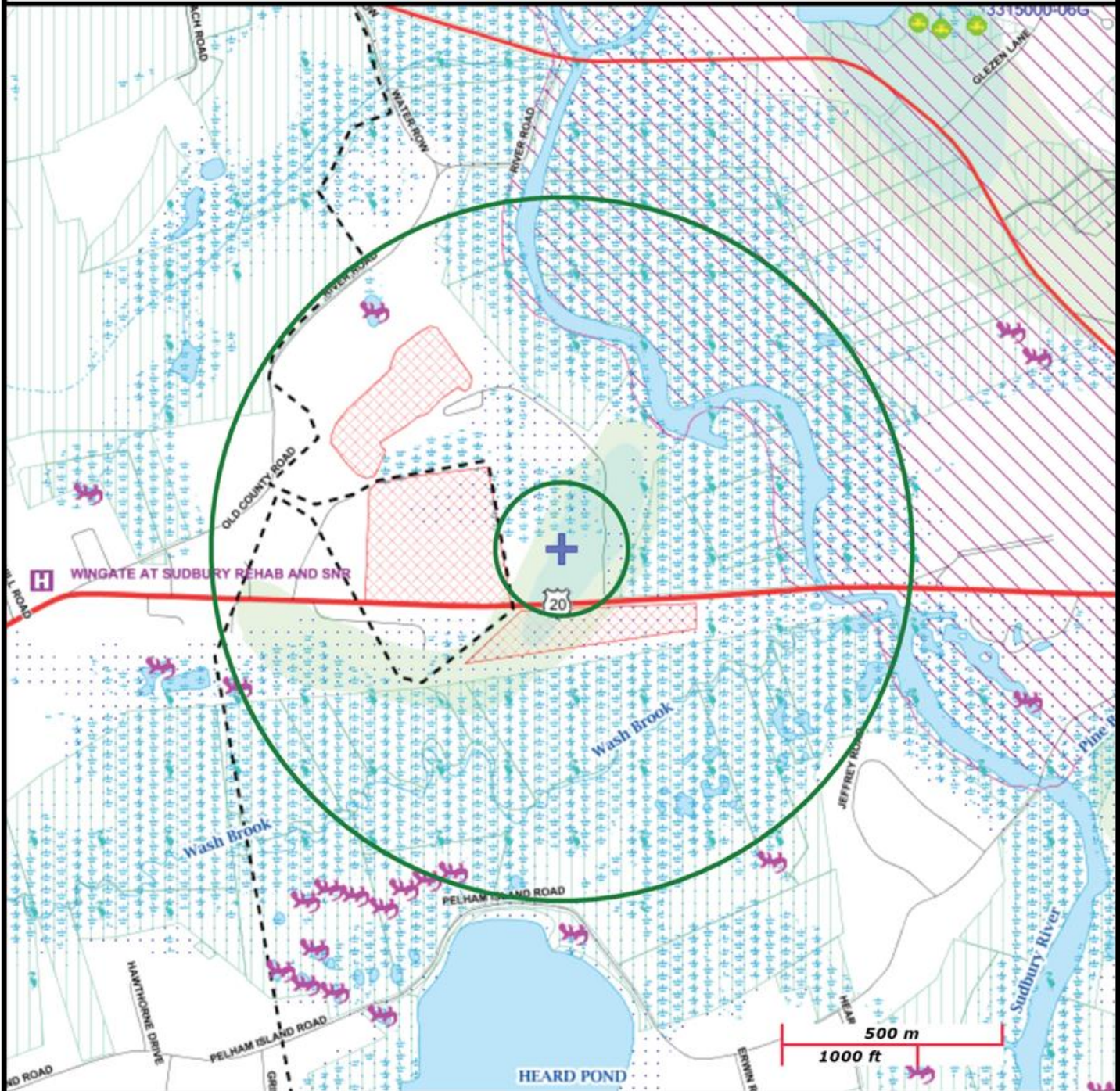
NAD83 UTM Meters:
4692950mN, 303850mE (Zone: 19)
October 6, 2017

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

LEGEND:

- E5 Test Pit Grid Number
-  Approximate Configuration of 32,000 cy Stockpile
-  4,500 cy Stockpile
TP-V-101 Test Pit Location
-  Approximate Configuration of 4,500 cy Stockpile



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

STOCKPILE GRID LAYOUT

RIVER'S EDGE

484 - 490 BOSTON POST ROAD
WAYLAND, MA

File No.:	DRAFT	FIGURE
Date:	03/05/19	3
Drawn:	KS	
Checked:	BP	
Job No.:	46047	

REVISIONS
 03/14/19

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