

# REPORT

September 2019

**DRAFT**  
**PUBLIC INVOLVEMENT PLAN UPDATE**  
**Former Medfield State Hospital**  
**45 Hospital Road,**  
**Medfield, Massachusetts**

*Prepared for:*

Division of Capital Asset Management  
and Maintenance  
One Ashburton Place, Room 201  
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## 1.0 PUBLIC INVOLVEMENT PLAN – UPDATE 2019

### Former Medfield State Hospital MCP Areas Medfield, Massachusetts Protection Release Tracking Number 2-3020799

#### 1.1 Introduction

Weston & Sampson, on behalf of the Division of Capital Asset Management and Maintenance (DCAMM), has prepared this Updated Draft Public Involvement Plan (PIP) for Release Tracking Number (RTN) 2-3020799 at the former Medfield State Hospital (MSH). This update amends the original 2010 PIP Plan addressing three Massachusetts Contingency Plan (MCP) disposal areas at the former MSH, located at 45 Hospital Road, Medfield, Massachusetts (the Site), as provided on Figure 1.

The Site consists of approximately 225-acres sub-divided into Parcel A2, currently owned by the Commonwealth of Massachusetts, and Parcel A, owned by the Town of Medfield. DCAMM anticipates transferring operating responsibility for a portion of Parcel A2 to the Massachusetts Department of Conservation and Recreation (DCR), however DCAMM will retain ownership of the proposed Activity and Use Limitation (AUL) area in Gateway Park. Additionally, a small portion of Parcel A, located near the Former Laundry Building, remains DCAMM's responsibility until it can be transferred to the Town of Medfield following remedial activities. Prior to these transfers occurring, additional MCP Response Actions at the three MCP disposal areas need to be conducted such that a "Condition of No Significant Risk" may be achieved.

The three disposal areas are being assessed and cleaned up as required by the MCP (310 CMR 40.0000) and include the following locations:

- Former Salvage Yard (SY) Area: Achieved permanent closure under Release Abatement Measure (RAM) Completion and partial A-1 RAO submitted to the Massachusetts Department of Environmental Protection (MassDEP) in August 2011.
- Construction and Debris (C&D) Area: Pursuing closure via a Phase IV Completion Report and Partial Permanent Solution Statement with Conditions (PSC) and AUL.
- Former Power Plant (PP) Area: Pursuing closure via a Phase IV Completion Report and Partial PSC and AUL.

This Updated Draft PIP Plan is being submitted per Subpart N (310 CMR 40.1400) of the MCP that describes the requirements and opportunities for public involvement, including the designation of Public Involvement Plan (PIP) sites and the development of PIPs. Section 2.5 describes the history of the Site pertaining to the development of the PIP for MSH.

The objectives of a PIP are to identify the specific opportunities for public participation in response action decision making that will take place; describe how and when advance notice of site activities will be provided; and explain how and when information about site investigations will be made available. As described in the following paragraph there is a specific process that must be followed under a PIP.

The preparation and distribution of an Updated Draft Plan is an important step in the process of continuing the involvement of the PIP Group. The Updated Draft Plan is to be distributed to members of the PIP Group and placed in the Medfield Town repository. A notice of availability of the proposed changes to the Draft Plan will be sent to those on the mailing list. DCAMM will hold a twenty-day public comment period on the proposed revised Plan. DCAMM will review the comments received, respond to the comments, and revise the Plan as appropriate. The final revised Plan will be placed in the information repository. As requested by the Town, electronic copies of these documents will be provided to the Town of Medfield for their upload to the Town of Medfield's website such that files can be reviewed using home computers.

## 1.2 MCP Process Summary

The Massachusetts General Laws Chapter 21E and the MCP regulations (310 CMR 40.0000) address environmental releases in Massachusetts. The MCP also known as "310 CMR 40.0000", is a body of detailed regulations and associated guidance documents that are required to be used in assessment and remediation activities for releases that may have impacted the environment. The MCP places primary responsibility for the assessment and remediation of a Site on the Site owner. A Site owner is then required to hire a state-licensed environmental professional called a Licensed Site Professional (LSP) to conduct and oversee the cleanup. An LSP is licensed by the State based on education, experience, and the satisfactory completion of an examination. Weston & Sampson is responsible for providing LSP services for the Site. More information on the LSP Program can be located at <https://www.mass.gov/how-to/hiring-a-licensed-site-professional> and <https://www.lspa.org/what-is-an-lsp>.

The MCP requires that response actions be conducted to address release conditions at sites. These response actions include assessing the nature, source and extent of the contamination; identifying the risk posed by the site; evaluating whether cleanup actions are necessary and if necessary, determining and implementing the most appropriate remedial actions. In addition, the remedial response action process provides opportunities for public involvement during the cleanup process.

The disposal site now encompassing all three of the previous RTNs includes locations where historic activities resulted in the release of one or more contaminants which were historically related to petroleum use (e.g. underground storage tanks associated with the Power Plant); boiler ash, construction debris and demolition debris (the C&D disposal area); and construction debris, demolition debris, and limited miscellaneous fill (the Salvage Yard disposal area).

## 2.0 DESCRIPTION OF RELEASE CONDITIONS

### 2.1 Site Description and History

The Massachusetts Department of Mental Health (and predecessor agencies) operated the Medfield State Hospital during its operating life from 1896 until it was closed in 2003. The former hospital grounds occupy approximately 225 acres, located about 2-miles north of Medfield's center.

The former Medfield State Hospital (hereafter "the Property") operated for over 100 years. As would be expected of facilities that operated for this long a period, historic waste management practices evolved over time and followed the evolution of applicable environmental rules and accepted practices. These waste management areas, once considered normal and legal, are now regulated under applicable laws, regulations, and policies. Based on the historic practices, releases to the soil and groundwater have been identified at the Property.

These releases or disposal sites are now subject to regulation under the MCP and have been assigned Release Tracking Numbers (RTNs) by the MassDEP. Table 1 provides a summary of these releases, as well as their regulatory status. In 2009, at DEP's suggestion, the open RTN's were linked under the oldest RTN (herein referred to as the "mother" RTN) and evaluated as one disposal Site, identified as the Special Project Designation (SPD) Area. The oldest RTN, is identified as RTN 2-3020799 Power Plant USTs Disposal Site. The approximate locations of the disposal sites are shown on Figure 2.

A brief summary of the three disposal areas is provided in the following paragraphs. Detailed information on the chronology, assessment and remediation activities, and the results of sampling and analysis of these areas are presented in a series of documents located at the Document Repository in the Town of Medfield's Public Library. As supplemental data is collected, new reports will be generated that will address the relationship of the new data with historical information in the previous reports.

#### The C&D Fill Disposal Area

The C&D Fill Disposal Area is located along the locally southern bank of the Charles River and includes approximately 2.2 acres land located within the Property. According to MassGIS resource mapping, the Site is within a potentially productive aquifer (PPA), and a portion of the Site is within a designated Zone II (a term used to describe the area surrounding a public water supply). Following the identification of lead and dissolved zinc in groundwater exceeding applicable Reportable Concentrations (RCs), notification was provided to the MassDEP on February 2, 2006. The MassDEP issued RTN 2-3025651 for the release notification. The former C&D Area was associated with historic waste management and disposal activities at the Site in areas that were wetlands. The former fill material ranged in thickness from approximately 7 to 12.5 feet (ft.) and was formerly present over much of the C&D Area. Summaries of environmental studies in the area performed by previous consultants and by Weston & Sampson are provided in Sections 2.3 and 2.4, respectively.

#### The Former Salvage Yard

In December 2008, test pitting activities located in the Salvage Yard identified the presence of lead in a soil sample collected on December 2, 2008. A Release Notification Form (RNF) was submitted to the MassDEP on April 1, 2009 for the presence of lead above the applicable RCS-2. Lead was detected at a concentration of 2,300 mg/kg. Summaries of environmental studies in the area performed by previous consultants and by Weston & Sampson are provided in Sections 2.3 and 2.4, respectively.

## Power Plant Area

In June 2001, eight monitoring wells located in the boiler plant area site were gauged and inspected for the presence of free product (NAPL). NAPL was discovered at a thickness of 14 inches in a monitoring well located at the western end of underground storage tank (UST) #2. The RTN was assigned based on the NAPL discovery. Additional reporting on this RTN was combined with RTNs 3-20984 and 3-21162 due to the close proximity of the releases.

In June 2002 a Phase I (ISI) and Tier Classification (TC) was prepared for the Power Plant Site. The Site was classified as Tier II based on a score of 168. In 2004, a Phase II/III was completed for the Power Plant area. The Phase II indicated no substantial hazard at the Site however additional response actions were determined to be necessary. A Phase III was conducted for the Site and remedial alternatives were identified. Remediation was determined not to be feasible due to existing USTs and the location of the building in close proximity to the USTs as well as the depth of soil. Therefore, a Temporary Solution in support of regulatory closure was proposed.

In support of the Temporary Solution, monitoring of the groundwater was selected as the most feasible remedial action. In August 2004, a Class C (Temporary Solution) Response Action Outcome (RAO) was submitted to the MassDEP. In November 2009, no measurable NAPL was detected in the monitoring wells. Based on the past observation of NAPL, the monitoring wells were rechecked and it was determined based on the gauging events, that the NAPL measurements may have been over estimated due to the high viscosity of the oil. It is likely that the viscous oil coated the inside of the well, contacted the oil/water interface probe and resulted in overestimation of the values of measurable NAPL present in the well. The buildings have since been removed and an evaluation of the presence of NAPL was conducted prior to construction of the C&D Area remedial alternative. No measurable NAPL was detected in the Power Plane wells and the data support a Permanent Solution. Summaries of environmental studies in the area performed by previous consultants and by Weston & Sampson are provided in Sections 2.3 and 2.4, respectively.

## 2.2 Soil and Groundwater Characterization According to the MCP

### 2.2.1 Soil

Considering both current and reasonably foreseeable Site activities and uses, soil is categorized as S-1, in accordance with the MCP, 310 CMR 40.0933(5). The soil is considered accessible because the Site is mostly unpaved and contaminants were detected in potentially accessible soils. The S-1 category is the most restrictive standard that can be applied to a disposal site.

### 2.2.2 Groundwater

At a minimum, the MCP categorizes all groundwater in Massachusetts as GW-3 (310 CMR 40.0932). The GW-2 criteria, as defined in the MCP, 310 CMR 40.0932, do not currently apply to the Site because, although groundwater is identified at the Site less than 15 feet below ground surface, occupied structures are not present. However, potential future residential development is proposed for a portion of the Site adjacent to the Former Laundry Building area; therefore, groundwater concentrations in this area will be compared to the GW-2 standards. The GW-1 criteria as defined in the MCP, 310 CMR 40.0932 (4) applies to a portion of the Site west of the Charles River Link trail because this area of the Site is located within a medium yield PPA. MassGIS data was used to delineate the GW-1/GW-2 boundary. Please refer to Figure 3 for the pre-remediation site plan which shows relevant boundaries.

### 2.3 Summary of Environmental Studies by Past Consultants

Assessment activities were conducted at the three disposal areas for approximately 10 years before Weston & Sampson was contracted by DCAMM in 2009. These prior assessments were conducted by several different consulting firms under contract to various Commonwealth Agencies. Specific activities included soil boring advancement, monitoring well installation, test pit excavation, topographic surveying to delineate disposal areas, and geophysical monitoring. Soil, groundwater, surface water, and sediment samples were collected and analyzed for compounds commonly encountered in these disposal areas, including: volatile organic compounds (VOCs), volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons (EPH), polychlorinated biphenyls (PCBs), semivolatile organic compounds (SVOCs), polycyclic aromatic hydrocarbons (PAHs), metals, total petroleum hydrocarbons (TPH), pesticides, methane, carbon dioxide, oxygen, lower explosive limit, hydrogen sulfide, toxicity characteristic leaching procedure (TCLP) metals, petroleum fingerprinting, hydrogen sulfide, total organic carbon (TOC), asbestos, pH, hardness, sulfate, nitrate, dissolved ferrous iron, dissolved solids, alkalinity, and chemical oxygen demand (COD).

Additional remediation activities were conducted at the former Power Plant UST disposal area to address leakage from the fuel oil USTs. The initial remediation activity occurred in 1978 to address a petroleum release to the ground surface. Contaminated soils were excavated and placed in two clay lined excavations. The locations of the excavations are shown on Figure 2 labeled as Clay Containment Area. This work was approved by the Massachusetts Department of Environmental Quality Engineering (the predecessor to the MassDEP). Later remediation activities were also conducted at the former Power Plant due to leakage from the underground storage tanks as well as the Clay Containment Area. These activities were conducted as Immediate Response Actions (IRAs) and Release Abatement Measures (RAMs). In accordance with the MCP, written plans were prepared describing proposed activities as well as summary reports describing actual field activities. These plans and reports were provided to MassDEP's Central Regional Office.

### 2.4 Environmental Studies by Weston & Sampson

DCAMM contracted with Weston & Sampson in 2009 to evaluate past activities at the three disposal areas (The SPD Site area) and to develop a comprehensive assessment program to validate the usefulness of the existing data in light of changes in the analytical methods, to identify data gaps, and evaluate the necessary investigative program to complete the characterization of the proposed SPD Site. Various assessment and remedial activities have been performed since that time in support of reports including:

- A RAM Completion and partial A-1 RAO were submitted to MassDEP on August 16, 2011 for the Salvage Yard Area.
- A RAM Completion and partial A-2 RAO were submitted to MassDEP on February 17, 2012 for the Clay Containment Area.
- A Phase III RAP for the SPD Area and Power Plant Area groundwater was submitted to MassDEP on February 28, 2012.
- A Final Phase II Comprehensive Site Assessment Report was submitted to MassDEP on June 4, 2012.
- A Final C&D Area Phase III RAP was submitted to MassDEP on June 4, 2012 which was later

revised during mediation and re-submitted.

- A Final SPD Area and PP Area Groundwater Phase IV RIP was submitted to MassDEP on December 30, 2013.
- Phase IV Status Reports for the SPD Area and PP Area Groundwater were submitted to MassDEP for November 2014, May 2015, March 2016, August 2016, March 2017, February 2018, April 2018, and January 2019.
- Supplemental Phase II Comprehensive Site Assessment was submitted to MassDEP on March 20, 2014.
- A Final Revised C&D Area Phase III RAP was submitted to MassDEP in March 2014.
- Final C&D Area Phase IV RIP was submitted to MassDEP on February 29, 2016.
- Phase IV Status Reports for the C&D Area were submitted to MassDEP for December 2014, June 2015, December 2015, and October 2016.
- IRA Status Reports were submitted to MassDEP on June 18, 2012, December 14, 2012, July 1, 2013, December 30, 2013, July 7, 2014, and February 2015.
- An IRA Completion Report was submitted to MassDEP on August 4, 2015.
- A Phase IV RIP Modification for the SPD Area groundwater was submitted on February 28, 2017.
- A Draft Phase IV Completion Statement for the C&D Area remediation was submitted on April 18, 2017. The finalization of this report is pending PIP review.
- A Draft Partial Permanent Solution with Conditions and Activity and Use Limitation for the C&D Area is under PIP review.

Highlights of the assessment and remedial activities performed to date are summarized as follows:

#### **Supplemental Phase II, March 2014**

Weston & Sampson conducted a series of supplemental subsurface investigations at the Site between February 2012 and February 2014 to improve understanding of Site subsurface characteristics and the extent of contamination. These investigations included passive diffusion bag sampling, the excavation of 76 test pits, the advancement of six (6) soil and 11 river borings, the installation of 10 monitoring wells, and the collection and analysis of numerous soil, groundwater, and sediment samples. Seven (7) seasonal groundwater sampling events were also completed during that span. Results of those investigations were used to delineate the extent of subsurface contamination, perform a Method 3 Human Health Risk Characterization, and to support the development of remedial options for the Site. The report concluded that a Condition of No Significant Risk to public welfare did not exist in the C&D Area, and that comprehensive remedial actions would be necessary to achieve a permanent solution for the Site.

#### **RAM Completion and Partial A-1 RAO – Salvage Yard, Status as of June 2019**

The remedial measures implemented during the RAM included the excavation, removal, and disposal of approximately 17,500 tons of fill material containing construction and miscellaneous debris from the SY Area. A RAM Completion Report and Class A-1 partial RAO was submitted to MassDEP in August 2011.

#### **Phase IV – C&D Area, Status as of June 2019**

Remedial activities were performed for the C&D Area beginning in July 2014 to address lead-impacted soils, asbestos-containing fill, and impacted sediments throughout the area. Approximately 550 cubic yards of stabilized lead-impacted fill materials were transported for off-site disposal; 30,420 cubic yards

of asbestos-containing fill materials were excavated and transported to a designated Relocation Area or segregated for alternate disposal or re-use; and 1,600 cubic yards of additional fill material were excavated from the Gas-line Area and replaced in the designated Relocation Area. Additionally, approximately 200 cubic yards of petroleum-impacted sediments were dredged from the CRS Area and transported to an off-site landfill. A cover system was constructed over the compacted fill material replaced in the Relocation Area for containment purposes. Please refer to Figure 4 for the C&D Area existing conditions Site plan.

Following the completion of remediation activities, Weston & Sampson conducted site restoration, biostabilization, and site closeout tasks to continue to improve the C&D Area. The Relocation Area was shaped, graded, and revegetated. Additional improvements to the area included the installation of stormwater management features, and the construction of a gravel parking area, canoe drop-off, site access road, walking trails, signage, and landscape features. Along the banks of the Charles River, approximately 78,000 square feet of wetlands were restored, including the application of hydric soil selected for its suitability for native species and the placement of tree trunks and stumps throughout the wetland for use as avian habitat. The riverbank was then stabilized using both biostabilization techniques and soil/stone materials to restore the natural riverbank profile, and to protect the newly restored wetland area from river erosion.

A Draft Phase IV Completion Statement was submitted to DEP on April 18, 2017. The finalization of this report is pending PIP review. Additionally, a Draft Partial PSC and AUL for the C&D Area is under PIP review.

#### **Phase IV – SPD Area, Status as of June 2019**

*In Situ* Chemical Oxidation (ISCO) was selected as the Comprehensive Remedial Alternative for treatment of PCE-impacted groundwater in the SPD Area in December 2013. Three separate ISCO injection events were conducted in February 2014, May 2014, and November 2014/January 2015. Weston & Sampson has performed seasonal groundwater monitoring of the SPD area following the injection events. Results of the monitoring events have indicated that PCE concentrations are stable with respect to post-ISCO event concentrations or rebounding due to matrix diffusion. Seasonal groundwater monitoring will continue to be performed on a quarterly basis to evaluate future ISCO applications and/or other/additional potential remedial alternatives.

Additionally, as part of the C&D Area remediation, six wells were installed on the downgradient edge of the Relocation Area. These sentinel monitoring wells are located within the wedge area of fill along the gas line easement and were sampled for VOCs and CAM 14 metals. Groundwater analytical results indicate that concentrations of cadmium, lead, and zinc exceeded the applicable Method 1 Cleanup Standards in three monitoring wells. Generally, concentrations are decreasing over time and equilibrating following construction activities. Concentrations will continue to be monitored in future sampling events and/or other potential remedial alternatives.

#### **2.5 Public Involvement History**

On October 14, 2009, DCAMM held a public meeting to convey the status of the project and their intention to file a Special Project Designation (SPD) with the MassDEP and to combine the open MCP sites under one assessment and remediation program.

On December 30, 2009, DCAMM submitted a letter to the DEP a Notice of Delay in Compliance with deadlines for a Tier II Disposal Site and requested a Tier II Extension Request and PIP Modification. The Tier II Extension Request was submitted based on conversations with the DEP regarding the submittal of a Special Project Designation and the linking of the three open Release Tracking Numbers (RTNs) at the MSH. At DEP's suggestion, the open RTN's were linked to the oldest RTN (herein referred to as the "mother" RTN). The oldest RTN, is identified as RTN 2-3020799 Power Plant USTs Disposal Site. Based on the Tier II Extension submittal, the three linked disposal sites will be evaluated as one disposal site under the "mother" RTN.

On December 30, 2009, DCAMM filed an SPD with the MassDEP. In the SPD application, DCAMM was seeking extensions or suspension of applicable MCP comprehensive response action deadlines. DCAMM was seeking MCP timeline relief so that rigid public funding timelines could be met. DCAMM anticipated that the SPD designation would help to successfully allow for the transfer of the relevant properties to MassDCR, as well as those designated for potential redevelopment in the existing central building area to the Town of Medfield. The SPD approach was and is the appropriate mechanism for coordinating the pace of the assessment and remediation activities under the MCP at the Property, with the rigid timelines and public funding and spending requirements for this project. As previously noted, the SPD Application was forwarded to the MassDEP on December 30, 2009 for uploading to eDEP. The public officials (Chief Municipal Officer and the Board of Health) were notified of the submittal by way of correspondence dated December 30, 2009. The legal notice for the SPD was submitted for publication in the Medfield Press and was printed on January 7, 2010. DCAMM has submitted SPD Permit and Tier Classification Extensions in 2012, 2014, 2016, and 2018.

The three MCP disposal areas listed on Table 1 have each become PIP sites due to the requests of a minimum of 10 citizens of the Town of Medfield. The first group was created in April 2003, to provide public input into the activities related to RTN 2-3020799 (Underground Storage Tank leakage at the former Power Plant). This group did not disband after submission of a Class C Response Action Outcome (RAO) statement in August 2004. It is DCAMM's goal to bring all MCP matters at the Property to a permanent solution, therefore, additional assessment and remediation, as necessary, may be required. The members of this original PIP group were contacted, and several members indicated their intention to continue as a PIP group. The other two PIP groups were formed in June 2009, for RTN 2-3025651 (the C&D Disposal Area) and September 2009 for RTN 2-0017471 (the Salvage Yard). The locations of the three MCP sites and the area being evaluated under the SPD are identified on Figure 2.

DCAMM originally intended to address each of these groups as separate and distinct PIP groups. However, meetings with the community and petitioners indicated that numerous PIP members were members of more than one of the PIP groups established for MSH. PIP Members indicated that they were looking to understand the MCP process, the technical aspects of the assessment and remediation programs, and the implementation of a comprehensive or holistic approach across the three MassDEP listed disposal areas. In addition, those members who were in multiple PIP groups were concerned about needing to attend multiple PIP meetings and reviewing an overwhelming number of plans and reports. DCAMM was sympathetic to the three groups concerns and established a single PIP group encompassing all three disposal sites upon submission of MassDEP Bureau of Waste Site Cleanup (BWSC) Form 107 Tier II Extension Request on December 30, 2009. Upon discussions with the MassDEP, the Tier II Extension also sought to combine the three active RTNs under the oldest active RTN (also referred to as the Power Plant RTN 2-3020799) forming one "mother" RTN and one PIP group.

This one PIP group approach streamlined the dissemination of information and reports to interested parties, and reduced the number of meetings that PIP members would need to attend.

In addition, this approach simplified the overall administration of the PIP process and allowed for more efficiency in responding to information requests from the interests of the group in a more cost-effective manner. Streamlining the process benefited the PIP members who requested merging the PIP Sites and who were not interested in attending multiple meetings where, arguably, the same content would be presented.

Prior to the Overview Meeting held on October 14, 2009, DCAMM and prior consultants (e.g. O'Reilly Talbot, and Okun Associates (OTO)) had several conversations with concerned citizens and Town officials to better understand the public concerns about the Site. Participants in these discussions included, but were not limited to:

- Mr. Michael Sullivan, Town Administrator
- Ms. Kristine Trierweiler, Assistant Town Administrator
- Ms. Leslee Willitts, Conservation Agent
- Ms. Ann Thompson, Chairman of the Board of Selectmen
- Ms. Betsy Dorisca, Chairman of the Board of Health

\*Since the submission of the initial PIP Plan, the following Town personal changes have occurred:

- Ms. Kristin Trierweiler, Town Administrator
- Ms. Evelyn Clarke, Administrative Assistant
- Ms. Leslee Willitts, Conservation Agent
- Mr. Gus Murby, Chairman of the Board of Selectmen
- Ms. Nancy Bennotti, Chairman of the Board of Health

In addition, DCAMM and Weston & Sampson have reviewed comments about the Site collected at several public meetings. The original PIP plan includes comment letters previously received regarding the sites within the SPD Area and a Transcript from the September 15, 2009 meeting identifying the public's concerns and responses to those concerns. Appendix A in this update includes public comments regarding the SPD Permit Extension, Phase IV C&D Area Completion Report, and the Partial PSC and AUL.

### 3.0 PUBLIC CONCERNS

#### 3.1 Addressing Public Concerns

The process for assessing and cleaning up disposal sites as set forth in the Massachusetts Contingency Plan (310 CMR 40.0000), is designed to address the effects of the site on health, safety, public welfare, and the environment. Once a release of oil or hazardous materials has been confirmed at a disposal site (Phase I of the remedial response action process), the process proceeds to:

- 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 (Phase II);
- Identification and evaluation of remedial response action alternatives and selection of feasible measures that will achieve a permanent cleanup at the site (Phase III); and
- Implementation of the selected remedial response actions (Phase IV).

Physical work at a disposal site includes sampling and other environmental field testing, and the implementation of the selected response actions. It may also include the implementation of measures designed to stabilize conditions at the site to implement risk reductions measures, and to prevent the continued migration of contaminants until planning for remedial response is underway (i.e., Immediate Response Measures or IRAs).

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.

As noted in Appendix A, the public has raised concerns about the three MCP disposal areas. The remedial response action planning process is designed to address 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.

Three major concerns that originally arose, and are included in the original 2010 PIP Plan, were related to the possible migration of groundwater contamination to one of the Town's public water supply wells (Town Well No. 6); contamination in the Charles River associated with historical disposal adjacent to the River; and potential impacts to children who may occupy the redevelopment area (Parcel A). These concerns were addressed by collection of relevant data during assessment activities. The results of this data collection were clearly identified in reports of Site activities prepared by Weston & Sampson.

Current concerns, provided in Appendix A, include the Phase IV Remedy Implementation Plan (RIP) for the SPD Area groundwater that is located on a parcel to be transferred to the Town of Medfield. Additional concerns include monitoring and maintenance of the Site, access road to/from the Site, public comment responses, and finalization of the Partial PSC and AUL.

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#### 4.0 PUBLIC INVOLVEMENT

In accordance with the MCP (310 CMR 40.1400), activities undertaken to involve the public in response actions serve two purposes:

- To inform the public about the risks posed by the disposal site, the status of remedial response actions, and the opportunities for public involvement; and
- To solicit the concerns of the public 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, DCAMM proposes to undertake specific activities during the remedial response process at the Site. These activities are described in greater detail in the sections that follow in this draft plan.

In accordance with 310 CMR 40.1405(6)(c), DCAMM is responsible for conducting response actions at the MCP site:

Contact Information is as follows:

Jason Kruckas  
Senior Operations Manager  
Division of Capital Asset Management & Maintenance  
220 Old Common Road  
Lancaster, MA 01523  
978-368-7602 Ext 101

#### 4.1 Information Repositories

**Publicly Available Site Files:** A file on each of the three disposal areas is maintained at the Central Regional MassDEP Office in Worcester. These files contain the documents pertaining to the Site. As new MCP reports are developed, copies are required to be provided to MassDEP. Opportunities to review MassDEP's Site files can be made by contacting the Worcester office at (508-792-7650) or online at <https://eeaonline.eea.state.ma.us/portal#!/search/wastesite>.

**Local Information Repositories:** DCAMM has established a local information repository to provide (site community) residents with easy access to information about the site cleanup process and results of site investigations. The site information repository contains copies of information related to the MCP sites. Information regarding the MCP site will continue to be sent to the repository by DCAMM as it is developed.

The information repository for the Site is located at:

The Medfield Public Library  
468 Main Street  
Medfield, MA 02052  
Phone (508) 359-4544

Web site: <http://www.medfieldpubliclibrary.org/>

As requested by the Town, electronic copies of documents subject to the PIP will be provided to the Town of Medfield for their upload to the Town of Medfield's website such that files can be reviewed using home computers. The Town of Medfield's web site is located at: <http://www.town.medfield.net>

#### 4.2 Site Mailing List

DCAMM will establish a master mailing list for the disposal site by combining the lists for each of the three RTNs. Anyone who wishes to be placed on the master list may be added or deleted (if already on the list and wish to be removed) by contacting Jason Kruckas at the address listed below. 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 other information about the MCP Site. DCAMM will maintain the mailing list and update it as necessary.

Anyone wishing to be added to or removed from the mailing list can write to:

Mr. Jason Kruckas  
Senior Operations Manager  
Division of Capital Asset Management & Maintenance  
220 Old Common Road  
Lancaster, MA 01523  
978-368-7602 Ext 101

Email: [jason.kruckas@state.ma.us](mailto:jason.kruckas@state.ma.us)

#### 4.3 Notification of Major Milestones and Events

The Massachusetts Contingency Plan requires community notification (310 CMR 40.1401) of major planning and implementation milestones at regulated sites. Major milestones include:

- Field work involving the implementation of any Immediate Response Actions (IRAs) for imminent hazards;
- The implementation of any Release Abatement Measures (RAMs);
- The use of respirators and other protective clothing;
- Residential sampling; and
- Phase IV remedial action.

and at the completion of each phase of remediation process including:

- IRA Completion Statement for imminent hazards;
- Each phase (e.g. Phase II, III);
- Response Action Outcome (RAO);
- Activity and Use Limitations (AUL); and
- Downgradient Property Status (DPS).

DCAMM has been involved with the MSH property for more than ten (10) years and as such has participated in multiple meetings with the community including local officials and Town representatives. Many of these meetings have been included in Selectman Meeting Minutes as posted on the Medfield Town website.

Notification to the CMO and BOH of field work activities related to the above bulleted items (Imminent Hazard IRAs, RAMs, respirators/protective clothing, residential sampling, Phase IV remedial actions) has and will continue to include information on the type of work and its approximate duration. Notification will be made by DCAMM to the CMO and BOH by first class mail at least three days prior to the start of field work. Notification has and will continue to be made to the PIP Group at the end of a remedial phase (as identified above) and will include a summary of the phase report and information on where the report can be reviewed. In the interest of maintaining the privacy of the individuals involved, copies of the Notification List are not included as part of this plan, but may be obtained from DCAMM by written request. DCAMM reserves the right to limit the distribution of the list, if in DCAMM's opinion, the requester may use the list for an illegal or inappropriate reason.

#### 4.4 Public Meetings

Appendix B 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. The public will be notified of the public meetings 14 days in advance. DCAMM will place a legal advertisement in the Medfield Press (in accordance with 310CMR 40.1400) and the PIP group will be sent a mailing regarding the meeting date, location and time. The schedule is a living document and as such is subject to change due to various factors.

A copy of the public notice announcing the public meeting will be mailed to each petitioner, the Chief Municipal Officer, the Board of Health and the MassDEP.

Appendix C provides the most recent public presentation for the draft Phase IV Completion Statement and Partial PSC and AUL.

#### 4.5 Public Comment Opportunities

DCAMM will provide specific opportunities for the public to submit comments on MCP response action submittals for the site. When key documents are available copies will be provided to the information repositories, and a notice of their availability will be sent to those on the Site mailing list. The notice will include the title of the document, where it is available for review, information about how to submit written comments to DCAMM and the length of the public comment period. DCAMM will determine the length of the comment period, which will normally be 20 calendar days. The public may also request extensions to comments periods. Notification procedures as identified in 310 CMR 40.1403(2) will be conducted.

Comment periods for Preliminary Response Actions may be reduced or eliminated (with MassDEP's review and concurrence) if the nature of a hazard dictates that response actions be performed immediately. DCAMM will be responsible for providing copies of documents to the information repositories and to the MassDEP Site file, as well as sending out notices of availability for the MCP documents it prepares.

Public comment periods are required for the following:

- Draft PIP;
- Phase II SOW;
- Phase II Report;
- Phase II Risk Assessment SOW;
- Phase II Risk Assessment Report;
- Phase III Remedial Action Plan;
- Phase IV Remedy Implementation Plan;
- IRA or RAM Plans and Completion Statements; and
- RAOs (including AULs).

As noted in 310 CMR 40.1405 (6)(e)(3), except as provided in 310CMR 40.1405 (6)(e)4, remedial actions that are the subject of the public comment period shall not proceed until the close of the public comment period.

#### **4.6 Response to Comments**

DCAMM will prepare a summary of the comments received for each reviewed document. DCAMM's responses to the comments will also be provided. A copy of this response summary will be sent by first class mail to those who submitted comments and will be placed in the information repository and the MassDEP site file. DCAMM will send a notice of availability of the response summary to those on the mailing list. The summary will be made available prior to DCAMM implementing remedial response actions recommended in the document under review and prior to moving to the next MCP phase.

## 5.0 SCHEDULE FOR PUBLIC INVOLVEMENT

Appendix B 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. The schedule is a living document and as such is subject to change due to various factors.

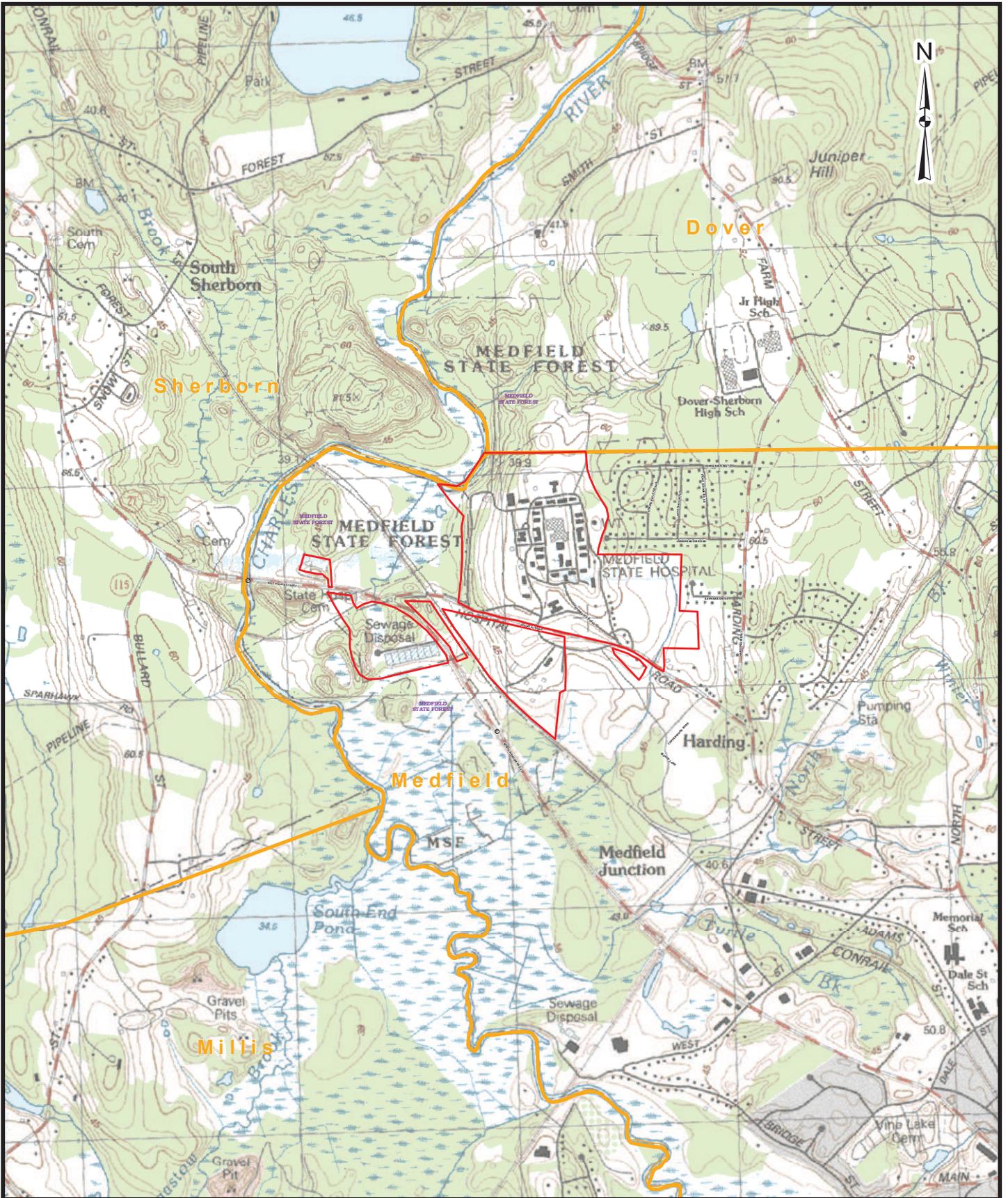
## 6.0 RESPONSIBILITY FOR PUBLIC INVOLVEMENT PLAN

DCAMM is responsible for conducting the public involvement activities at this site. In that capacity, DCAMM has developed this Updated Draft Public Involvement Plan (PIP) to solicit public comment, after which it will prepare a final PIP.

## 7.0 REVISIONS TO PUBLIC INVOLVEMENT PLAN

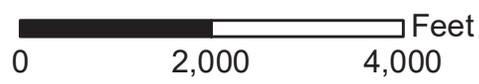
This PIP may be revised as necessary during the course, of the remedial response action process. If revisions are proposed, DCAMM will place copies of the proposed changes in the local information repository, and will send a notice of the availability of the proposed changes to those on the mailing list. DCAMM will hold a twenty-day public comment period on the proposed revised Plan. DCAMM will review the comments received and revise the Plan as appropriate. The final revised Plan will be placed in the information repository.

Figures



- MSH Property Boundary
- MA Towns

**FIGURE 1**  
**Medfield State Hospital**  
**Location Plan**



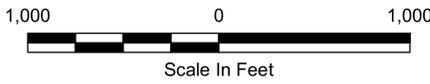
Path: \\gisdata\serv\gis\DateStore\Client\Medfield\MA\Project\Medfield State Hospital Figure 2 Assessment Areas Map Updated 20120301 8x11.mxd User: laplewip Saved: 3/1/2012 3:17:43 PM Opened: 3/1/2012 3:18:03 PM



**Legend**

- Proposed Development Parcel
- MSH Property Boundary
- Areas of Assessment

**FIGURE 2**  
**TOWN OF MEDFIELD, MASSACHUSETTS**  
**MEDFIELD STATE HOSPITAL**  
**ASSESSMENT AREAS**





SCALE IS APPROXIMATE

LEGEND:

- 190— EXISTING 10' CONTOUR
- 192— EXISTING 2' CONTOUR
- — — — — ORDINARY HIGH WATER (APPROX. ELEV.=114.0)
- — — — — FLOOD PLAIN (ELEV. 123.0)
- — — — — TOP OF BANK
- — — — — LIMIT OF WETLANDS
- — — — — 200' RIVERFRONT AREA
- — — — — WETLAND BUFFER ZONES (50' AND 100')
- BUTTONBUSH SWAMP
- — — — — SEASONAL LOW WATER (APPROX. ELEV.=110.0)
- — — — — C&D AREA BOUNDARY
- — — — — MEDIUM YIELD POTENTIALLY PRODUCTIVE AQUIFER
- — — — — ZONE II BOUNDARY (SOURCE MASSGIS)
- W — WATER LINE
- D — DRAIN LINE
- G — GAS LINE
- ST — STEAM LINE
- S — SEWER LINE
- — — — — UNDERGROUND TUNNEL
- ||||| ABANDONED RAIL LINE
- — — — — ESTIMATED LIMIT OF FILL
- — — — — STREAM
- — — — — TREE LINE
- UMH-2 UTILITY MANHOLE (STEAM PIPE)
- ⊙ DRAIN MANHOLE
- CATCHBASIN
- ⊙ SEWER MANHOLE
- ⊙ UTILITY POLE
- — — — — STORMWATER OUTFALL
- ⊙ BOULDERS AND AREAS OF ROCK
- ASPHALT PAVEMENT
- 20' WIDE GAS LINE AREA
- FORMER POWER PLANT AREA
- HISTORIC DISPOSAL AREA

NOTES:

1. BASE TOPOGRAPHIC SURVEY PLAN PREPARED BY COL-EAST, INC., DATED AUGUST 2, 2010, WITH ADDITIONAL SURVEY PERFORMED BY WESTON & SAMPSON IN DECEMBER 2010 AND JANUARY 2011.
2. BANK OF RIVER ALIGNMENT ADAPTED FROM AERIAL PHOTOGRAMMETRY.

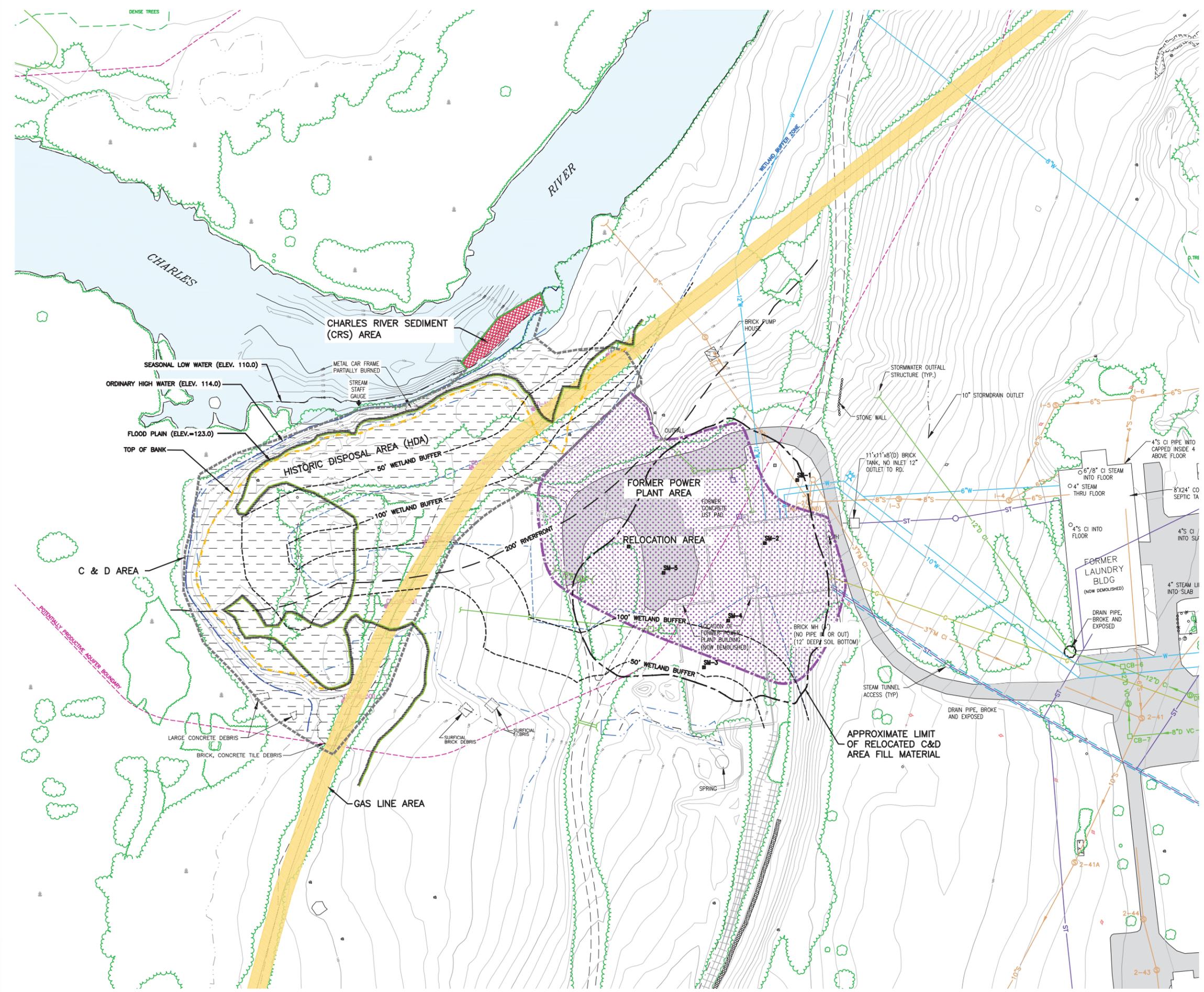
**FIGURE 3**

MA DIVISION OF CAPITAL ASSET MANAGEMENT AND MAINTENANCE  
MEDFIELD STATE HOSPITAL, MEDFIELD, MA

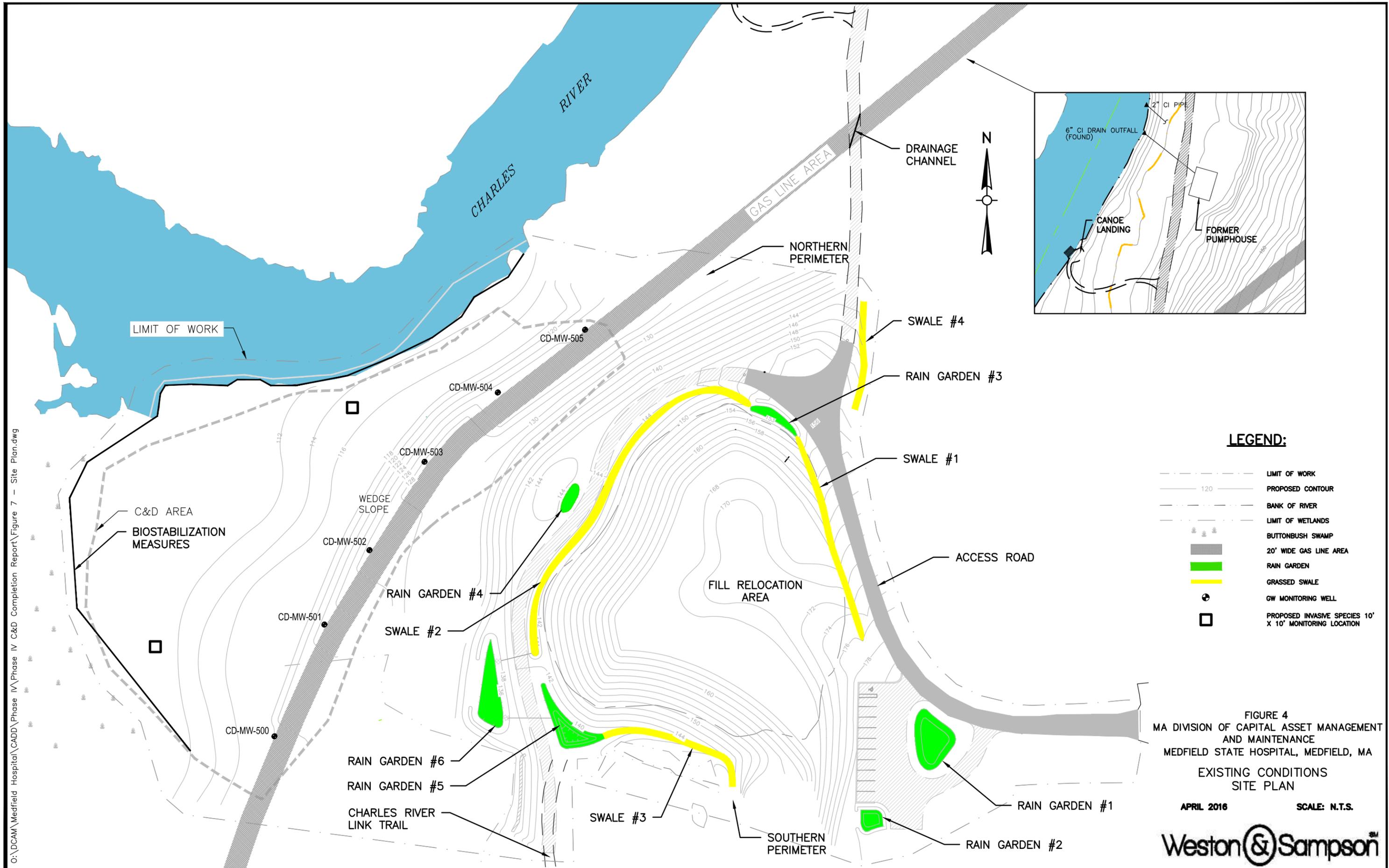
**PRE-REMEDATION SITE PLAN**

DESIGNED BY:	CHECKED BY:	DATE:
--------------	-------------	-------

**Weston & Sampson**<sup>SM</sup>



C:\DCAMM\Medfield Hospital\CADD\Phase III\Report Drawings\Figure 2 Site Plan.dwg



c:\DCAM\Medfield Hospital\CADD\Phase IV\C&D Completion Report\Figure 7 - Site Plan.dwg

**LEGEND:**

- LIMIT OF WORK
- 120 PROPOSED CONTOUR
- BANK OF RIVER
- LIMIT OF WETLANDS
- BUTTONBUSH SWAMP
- 20' WIDE GAS LINE AREA
- RAIN GARDEN
- GRASSED SWALE
- GW MONITORING WELL
- PROPOSED INVASIVE SPECIES 10' X 10' MONITORING LOCATION

FIGURE 4  
 MA DIVISION OF CAPITAL ASSET MANAGEMENT  
 AND MAINTENANCE  
 MEDFIELD STATE HOSPITAL, MEDFIELD, MA  
 EXISTING CONDITIONS  
 SITE PLAN

APRIL 2016 SCALE: N.T.S.



Tables

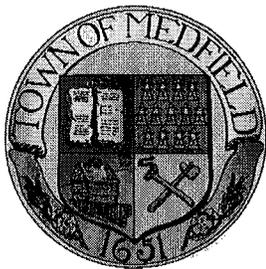
**Table 1**  
**Summary of Release Tracking Numbers (RTNs) associated with Special Project Designation**  
**Former Medfield State Hospital**  
**Medfield, Massachusetts**

RTN	Release Location	Description	Reporting Category	Notification Date	Compliance Status	Compliance Date	Phase	RAO Class	Chemical Type
2-3020799	Power Plant	Discovery of 14" of NAPL in a monitoring well adjacent to UST#2	72 Hour	6/15/2001	RAO	8/10/2004	Phase IV	C1	Oil
2-3025651	Construction Debris Site along River	Exceedence of RCs for lead in soil and zinc in groundwater	120 Day	2/6/2006	Tier 2	9/28/2007	Phase II	-	Hazardous Material (Metals)
2-0017471	Salvage Yard	Exceedence of RCs for lead in soil	120 Day	4/1/2009	Unclassified	8/16/2011	-	Partial A1	Hazardous Material
2-3020799	C&D Area	-	72 Hour	5/27/2011	Special Project	Ongoing*	Phase IV	-	Petroleum
2-3020799	SPD Area	-	120 Day	2/18/2011	Special Project	Ongoing	Phase IV RIP Modification	-	Hazardous Material (PCE)

\*The C&D Area is under PIP review for a Phase IV Completion Statement and Partial Permanent Solution with Conditions and Activity and Use Limitation (June 2019)

**Appendix A**

Public Comments (Letters/Transcript)



# TOWN OF MEDFIELD

Office of

## BOARD OF SELECTMEN

TOWN HOUSE, 459 MAIN STREET  
MEDFIELD, MASSACHUSETTS 02052-0315

(508) 906-3011 (phone)  
(508) 359-6182 (fax)

**Kristine Trierweiler**  
Town Administrator

March 14, 2019

Jason Krukus, Senior Operations Manager  
Division of Capital Asset Management and Maintenance  
1 Ashburton Place, Room 201  
Boston, MA 02108

Re: Town of Medfield Comments on C&D Area Draft Reports:  
Phase IV RIP Completion Statement/As-Built/Final Inspection dated January 22, 2019  
Partial Permanent Solution with Conditions dated February 7, 2019

Dear Mr. Krukus,

Below are comments from the Town of Medfield on the on the documents referenced above. On February 6, 2019 a Draft C&D Area Phase IV Remedy Implementation Plan Completion Statement and As-Built Construction/Final Inspection for RTN 2-3020799 was provided to the public during a PIP meeting conducted at the Medfield Town House by Weston & Sampson for the Division of Capital Asset Management and Maintenance (DCAMM). On February 7, 2019 copies of the Draft Partial Permanent Solution with Conditions were delivered to the Town House for distribution to the public. I appreciate DCAMM's extension for the Town to provide comments.

Phase IV RIP Completion Statement/As-Built/Final Inspection dated January 22, 2019

1. Table of contents, p. i : typo in title section 2 and in header to section 2.0
2. Re: ES: Since there was a 5 year agreed upon monitoring period, and one year was skipped, the monitoring should be extended to 2021 so that there are 5 years of monitoring as agreed upon.
3. Page 1-2, first paragraph states, "three P IV status reports have been submitted beginning in December 2014 and every six months thereafter." Please confirm that this means that there have been 9 status reports submitted in total.

4. Page 1-2, Second paragraph states, "a P IV status report for GW was submitted beginning in November 2014 and every six months thereafter." Please confirm that this means that there have been 9 GW status reports submitted in total.
5. Page 1-5, Note that the bullet indicates that the GIS shows the C & D area as "Protected Open Space", this is significant to the wording of the AUL. in that as such, there can be no uses as developed land, or gardening, even in raised beds as suggested.
6. Page 2-2, Section 2.3.1. It is noted that institutional controls in the form of an Activity and Use Limitation ("AUL") is required on the relocation area, "as well as the existing gas line area." As such, DCAMM's AUL responsibilities include ensuring that the owner of the gas line easement, maintains the line in conformance with the terms (LTMP) as negotiated with the Town. The gas line easement needs to be actively maintained and kept from becoming overgrown with vegetation consistent with the mediated agreement between DCAMM and the Town.
7. Page 2-2 , Section 2.4.Paragraph 1, last line, the word "proposed", should be replaced with "agreed upon", correct? A bullet should be added to the list of Phase IV activities, the bullet should summarize the RIP OMM agreed upon incorporating the requirements of 310 CMR 40.0874 (3) (d)(e)(f)(g). These requirements are ongoing as an Active Remedial Monitoring Program, part of Active Operation and Maintenance. (310 CMR 40.0006 (12)).
8. Page 3-1, Section 3.0 (a), acknowledges the property as "public open space. " As such other uses such as development or gardening of any type are not to be permitted.
9. Page 3-1, Section 3.1 Permitting, a PSwC cannot be completed until the Order of Conditions from the Conservation Commission has been completed and a Certificate of Compliance is achieved.
10. Page 3-4, Section 3.2.4 A description of the RAA for the gas line is given but the figure Appendix does not include details in the form of where it is located on the plan view or in cross sectional view. This information should be added to clearly document what was built.
11. Page 3-4, Section 3.3 A plan should be referenced in the first paragraph. The plan should show the limits where the material came from (this area was subject to closure testing sampling), and the limits of where it is now located.
12. The As Built Plan in the Appendix is a grading plan and not representative of the RAA, the plan is also barely legible. The plan should show all of the regulatory jurisdictional boundaries as depicted in the attached figures.
13. Section 3.4.1 Assuming work was performed in accordance with "the landscaping plans and specifications", that also show stormwater management features, an as-built landscaping plan should also be included, and updated to reflect conditions as of the

filing of this report, not as of October 2015, since the Completion Statement is being signed with submittal of this report.

14. Section 3.4.4 The section should indicate whether or not the site controls were removed before or after consultation with the Conservation Commission.
15. Page 3-6, Section 3.5 The first two paragraphs describe a variety of testing but does not give a citation for where the documentation exists. This data should be added and if not previously submitted, it should be submitted herein.
16. Page 3-7, Section 3.6 Groundwater Monitoring section: the last sentence indicates that groundwater monitoring will be conducted in accordance with the short and long term monitoring plan. However, this activity is also an MCP response action required under the MCP, as such it is also an Active Remedial Monitoring Program, part of Active Operation and Maintenance. (310 CMR 40.0006 (12)).
17. Page 3-7, Section 3.8 Same comment as above, monitoring is part of Active Operation and Maintenance, as part of the RIP (310 CMR 40.0874(3)(d)), and not simply a requirement of any agreed upon actions between DCAMM and the town.
18. Page 3-8, Section 3.8 continued. A bullet should be added to the list of "major components" stating "monitoring the relocation area to ensure compliance with the CRA".
19. (d) The as-built drawings are insufficient in detail and not consistent with the level of complexity of the CRA. They are hard to read, missing jurisdictional boundaries and much of the important information shown on the attached figures by W & S. No as-built for the CRS is included.
20. Page 4-1, Section 4.1 (b) The wording in the MCP as shown in this section uses the word "is" not "was". Sec. 4.1.2 should add a bullet to the design criteria list acknowledging that monitoring and maintenance was part of the design criteria (see your section 4.1.8 on p.4-5). Since these requirements were not fully met or not finished yet as proposed in the RAA, is it fair to say that the design criteria has been met?
21. Page 4-2, Section 4.1.3 The risk assessment is described as "preliminary", yet is this the same Risk Assessment used in the PSwC? The sentence regarding vegetable gardening should be deleted since the area is protected open space where any form of gardening would not be permitted, especially without the consent of the public. The last sentence states "A full risk characterization will be performed and included in future MCP submittals" Is the Risk Characterization in the draft PSwC a new version with an old date?
22. Page 4-2, Section 4.1.3 Second paragraph, second before last sentence, add "As long as it is maintained" to the beginning of the sentence. The last sentence affirms that monitoring and maintenance constitutes a Phase V activity under the MCP, as such it is "Active Operation and Maintenance".

23. Page 4-2, Section 4.1.4 Effectiveness needs to meet 310 CMR 40.0877(4)(c), evaluating the performance of the CRA. This section does not read as a performance evaluation based upon empirical data, given that last year was missed, can an evaluation be made?
24. Page 4-2, Section 4.1.4 The sentence regarding gardening should be deleted (protected open space).
25. Page 4-2, Section 4.1.4 Last sentence, it should be noted that monitoring and maintenance is required as a Phase V element of the CRA, not simply as a condition of the AUL.
26. Page 4-5, Section 4.1.8 Noted that "monitoring" is listed as a design element.
27. Page 4-6, Section 4.2 (d) If no Certificate of Compliance from the Conservation Commission has been issued, can the completion statement be finalized? It constitutes an unfulfilled permit that could require more work that would need to be undertaken as remedial response actions, especially if it caused remediation waste disturbance.
28. Page 5-1, Section 4.2 (c) This paragraph is inconsistent with the requirements to meet performance standards of the MCP. Monitoring is included and as such Active Operation and Maintenance was proposed as part of the CRA. The operation and maintenance is an active remedial monitoring program. This Active Operation and Maintenance meets the definition located at 310 CMR 40.0006(12)(c) and not as referenced in the text (12)(a) or (12)(b).
29. Does the ongoing groundwater sampling include metals? If so, explain how the C & D area can be closed with a partial permanent solution that assigns a groundwater source area to the laundry parcel.

#### Permanent Solution With Conditions and Activity and Use Limitation

1. p. ES-1: The bullet list doesn't include soil removed as ACM, is the ACM soil (as identified in the shipping paperwork) included in the first or second bullet?
2. p. ES-2: The phase IV mentions that an updated Risk characterization would be filed, yet this section indicates that the PS is based upon the M3 RA?
3. A description of the ongoing OMM should be made in this section.
4. p.3.3 Sec. 3.3.2 Last sentence indicates that separate SPD-area Phase IV RAAs are being conducted as related to VOCs, and not metals.
5. p. 4-1 Sec. 4.1 Add "In February 2016" to first line.
6. Delete reference to vegetable gardening in paragraph 2.

7. Paragraph 3, reword the sentence regarding utilities since it reads that “no” utilities are present in capped areas “except for”, it should read that only one utility is present in the Relocation Area.
8. Bullet 3 – delete “except those that have been planted in raised beds”
9. Bullet 4 – reword to “Planting of trees without review by a landscape architect to ensure that the cap will not be invaded by deep reaching roots”
10. Bullet 5 – insert after the word “use”: “or neglect to maintain” and after the word “damage” insert “or potentially damage”

#### Activity and Use Limitation

1. The AUL needs to incorporate any and all long term monitoring and maintenance conditions (from the long term monitoring and maintenance plan) of the capped area including the need to keep the vegetation cut so that the capped area can be inspected and monitored in the area subject to the AUL. This was agreed to in mediation.
2. The AUL should include a requirement to keep the area subject to the AUL free and clear of solid waste, and that the roadway, parking lot, veterans area and all stormwater management elements (rain gardens and swales) need to be maintained as constructed and free of overgrowth and solid waste.
3. Delete 2. Inconsistent (iii) section regarding the exception for raised bad planting since this is public open space
4. Reword (iv) to : Planting of trees without review by a landscape architect to ensure that the cap will not be invaded by deep reaching roots
5. Obligations, (v) Insert after “confirm”: ongoing maintenance activities specified in the LTMMMP and to ensure that the cap is effectively preventing exposure.
6. (vii) add “maintenance for vegetation control along the gas line is the responsibility of the current owner of the easement, DCAMM. DCAMM will remain responsible for the AUL conditions including ensure that the maintenance is taking place, even in the event of transfer to DCR or other entity.”

Thank you for the opportunity to comment. I look forward to working with you as they project moves to completion.

Sincerely,



Kristine Trierweiler  
Town Administrator

CC: Mr. Jeffery Dill, Director of Property Operations, DCAMM

Ms. Lauren Lesinski, LSP, CHMM Deputy Director, Environmental Services

Mr. Frank Ricciardi, P.E., LSP, Weston & Sampson

Ms. Margaret Van Deusen, Deputy Director and General Counsel, CRWA

Mr. John Thompson, Medfield State Hospital Buildings and Ground Chairman

Medfield Town Selectmen (M. Marcucci, O. Peterson, G. Murby)

Mr. William Massaro, Medfield Mediation Committee

Margaret R. Stolf, Environmental Counsel

Ms. Leslee Willitts, Medfield Conservation Agent

February 27, 2019

Former Medfield State Hospital  
45 Hospital Rd  
Medfield, MA

**SPD Permit and Tier Classification Extension  
PIP Comment Responses**

On behalf of the Division of Capital Asset Management and Maintenance (DCAMM), Weston & Sampson has provided the following responses to the Medfield Public Involvement Plan (PIP) group comments regarding the SPD Permit and Tier Classification Extension submitted to the Massachusetts Department of Environmental Protection (MassDEP) on November 21, 2018. The extension request was approved on December 4, 2018 by MassDEP, however the public comment period was extended to January 28, 2019.

**Kristine Trierweiler  
Town Administrator**

1. *Public Process: Medfield has worked extensively with DCAMM over several years to ensure that MSH is fully remediated and maintained. These extension requests are a reminder that we need to reengage the public process to ensure that it is consistently implemented over time. MSH is subject to a Public Involvement Plan implemented to 310 CMR 40.0000 and a July 2013 Settlement Agreement between Medfield, DCAMM, and other stakeholders. Both documents included review of drafts by the public, prior to their submittal for regulatory review, an important step which has not been carried out recently.*

Response 1  
So noted.

2. *Public Notice: To assist the public in following the cleanup at the site, Medfield requests that the extensions be conditioned on DCAMM providing notice to John Thompson, William Massaro, the PIP point of contact, and me. Notice should include 10 days advance notice of drafts for an opportunity to comment, and notice of other major mile stones including filings with MassDEP. A hard copy of all filings should be provided to the Medfield Library for the Information Repository (the last filing received by the library was the 2015 Immediate Response Action Completion Report) and an electronic copy should be provided to the Town. These requirements are consistent with the PIP and the Settlement Agreement.*

Response 2

We will provide 10-day notice of drafts and notify you, Bill Massaro and John Thompson if we need to truncate the notice time for any reason. Also, we will update the Town Repository with any missing reports since the filing of the IRA Completion in 2015 and continue to do so with and new submittals. Additionally, we will provide the Town with a USB containing electronic copies of the missing reports.

3. *Public Meetings: The extensions should also be conditioned upon DCAMM reinstating public meetings. To that end, I appreciate that DCAMM's consultant has reached out to me to schedule a public meeting on February 6, 2019. Additionally, DCAMM should reinstitute the workgroup meetings developed as part of the Settlement Agreement. Discussions of investigation and remedial approaches have proven helpful in the past and resulted in Town, the public, and stakeholder support of the Phase IV approved in 2014.*

Response 3

DCAMM will reinstitute the workgroup meetings if following review of any draft MCP documents there is excessive comments/issues that need to be resolved prior to issuing the final documents.

4. *Remediation: The SPD should continue to include the C&D Area (now referred to as "Overlook Park"), as well as the SPD groundwater area. Unlike the Salvage Yard Area and the Clay Containment Area which were removed from the SPD Permit when they achieved a permanent solution, the C&D Area will be subject to an AUL which requires regular maintenance. Given that maintenance has already proven challenging, it should remain within the SPD Area to help ensure public review.*

*Medfield acquired a portion of the MSH property, although DCAMM has retained the Laundry Parcel on which the PCE source is located and Overlook Park, which will eventually be transferred to DCR. The Town informed DCAMM, under a 2014 Land Disposition Agreement, that it does not wish to retain permanent access to Overlook Park on Town property and DCAMM is in the process of constructing a permanent access road across Commonwealth-retained MSH Property. This change will require DCAMM to reevaluate its access needs for completing the remediation.*

Response 4

The C&D Area and SPD Area groundwater will both remain part of the SPD Permit.

**John Thompson**  
**Chairman**  
**Medfield State Hospital Buildings & Grounds Committee**

1. *Please provide a copy of the Long-Term Monitoring Reports for 2018. What is the current status of the slope and cap stability?*

Response 1

Due to the personnel change at DCAMM, Long Term Monitoring was not completed in 2018. Monitoring is planned to restart in Spring 2019 and reports will be provided to the appropriate parties.

2. *The November 22, 2017 Status Report states: "Please note that a number of the components of the Shore and Long-Term Monitoring Plan, related to wetlands restoration and wildlife habitat, were previously performed by The Garden Continuum (TGC). The observations and results of their monitoring activities have been provided separately by TGC for the 2016 growing season. DCAMM is currently procuring a contractor to conduct the wetland monitoring for the remainder of the Short and Long Term Monitoring Plan. These monitoring events will occur biannually in Spring and Fall depending on weather conditions."*
- Who was awarded the replacement contract in 2018 and where are the resulting reports?*
  - What was the budget for monitoring and maintenance in 2017, 2018, and what is budgeted for 2019?*
  - Who is responsible for and who is (are) the contact(s) for long term monitoring and maintenance of the Overlook Park, and who is going to pick up trash and litter at and near the parking lot and how often will this occur? Same question related to the canoe launch.*

Response 2

- Weston & Sampson is intended to be the contracted for the wetland portion of the Long-Term Monitoring, expecting to restart in Spring 2019.*
  - The budget will be similar to prior monitoring and maintenance budgets.*
  - DCAMM will be overseeing the monitoring and maintenance at Overlook Park and the Canoe Launch. DCAMM and the Town have discussed the possible installation of signage to prevent litter. DCAMM will continue to discuss a resolution with the Town.*
3. *What is the current plan for the former pump house area?*

Response 3

The previous plan for the former pumphouse area was to install an interpretive sign. However, this area will remain in its current condition to avoid future/additional vandalism due to its remote location.

4. *Wetlands Impacts:*

- a. *What is the current status of the meeting the requirements of the 2014 Order of Conditions from the Medfield Conservation Commission?*
- b. *Can DCAMM provide a table based upon TABLE 2: Monitoring and Maintenance Program, Appendix A March 2014 NOI that adds a column stating for each row, the dates which each task was performed, and by whom, a second column for each row, indicating whether or not the Library, Chief Municipal Officer, Board of Health, Conservation Commission, and PIP participants were given documents or notified that documents were available?*
- c. *Can DCAMM provide the public with a list for the action items in Table 2 above, indicating where each of the monitoring reports and evaluations described under "Description" in the table is located?*

## Response 4

- a) The following conditions are deemed ongoing/outstanding and are addressed as follows:
  - a. **Condition 42h:** Provide documentation in writing of our investigation into the cistern.
    - i. Under assessment and review.
  - b. **Condition 49:** Provide monthly reports.
    - i. Monthly monitoring reports were submitted to the ConComm for November 2015-November 2017, per the 2 year requirement of the Short and Long Term Monitoring Plan. Bi-annual monitoring is required for 5 years following construction. These bi-annual reports will be submitted to the ConComm when monitoring restarts in Spring 2019.
  - c. **Conditions 76 and 81:** Once the site is deemed to be stabilized, conduct a site walk with ConComm Agent so that all erosion controls can be removed.
    - i. The erosion controls were removed following a site walk with the ConComm.
  - d. **Condition 80:** Request for Certificate of Compliance.
    - i. This cannot be done until BWV replication monitoring requirements and long term monitoring requirements are complete (5 years).
  - e. **Conditions 82-86:** Conditions in Perpetuity which include: 82) pesticides, herbicides, fungicides, and fertilizers; 83) de-icing; 84) maintaining stabilized slopes; 85) no dumping of leaves, grass clippings, brush or other debris; and 86) no additional alterations.
    - i. We would recommend that these conditions are completed (by DCAMM and WSE) prior to submitting the Request for Certificate of Compliance (Condition #80) as they are in perpetuity.
    - ii. Under assessment and review.
  - f. **Condition 88:** Wetland replication site inspections and report submittal requirement - 1-week after following construction of replication area and in regular intervals thereafter.
    - i. TGC submitted reports to DCAMM for the 2016 growing season. Wetland monitoring was not conducted in 2017 and 2018, however it will restart in Spring 2019 by Weston & Sampson. These reports will be submitted to the ConComm.
  - g. **Condition 89:** Submit all reports listed.
    - i. The construction period monitoring/Short Term Monitoring reports (i.e., air monitoring, groundwater monitoring, meeting minutes, turbidity monitoring, and winter erosion control monitoring) have been submitted to the ConnComm following construction.
    - ii. Post construction monitoring monthly reports from November 2015-November 2017 were submitted to the ConComm. Wetland reports from 2016 will be submitted to the ConComm. Any new monitoring starting in Spring 2019 will be submitted to the ConComm.
  - h. **Condition 96:** Wetland Specialist to certify in writing that the construction of the resource area mitigation areas was constructed in compliance with the Order.
    - i. Under assessment and review.
- b) This table is part of the Short and Long Term Monitoring Plan. We can update the table to include these rows and include in the Long Term Monitoring report to commence in Spring 2019.
- c) Yes, this can be included in the revised table for 4)b).

5. *Relocation Area*

- a. *What is the current status of remediation of the Construction and Demolition Area?*
- b. *What is the current groundwater quality at the C&D Area?*
- c. *Has the relocation area caused any change in groundwater quality at the C&D Area, or the Power Plant Area?*
- d. *Has the groundwater flow direction changed as a result of the relocation area?*
- e. *Is there any leachate breakout observed along the edge of the restoration area?*
- f. *If so, how can leachate breakout be observed if the relocation and restoration area is covered by dense vegetation?*
- g. *What is the condition of the groundwater quality beneath the gas line?*
- h. *How can the gas line area be monitored for subsidence and erosion if it is overgrown with vegetation?*
- i. *Would the overgrowth on the gas line cause a delay in emergency response to a gas leak? It was noted that the gas line is very shallow in the ground during the construction activities. Gas line in Massachusetts have proven to be high risk.*

## Response 5

- a) The remediation in the C&D Area is completed under the Phase IV Completion Statement and Partial Permanent Solution with Conditions as submitted as a draft to the PIP group on February 6, 2019.
  - b) Groundwater from two of the six C&D Area sentinel wells currently indicate exceedances of lead, and zinc above the applicable GW-1 Standards in several wells. These metals will be evaluated as part of the SPD Area Groundwater with potential remedial actions outlined in a Phase IV RIP Modification.
  - c) No, it has not caused any changes in the groundwater quality as a result of the relocation area.
  - d) No, the groundwater flow direction has not changed as a result of the relocation area.
  - e) We have not observed any leachate breakout along the edge of the restoration area.
  - f) None Applicable.
  - g) Groundwater from two of the six C&D Area sentinel wells currently indicate exceedances of lead, and zinc above the applicable GW-1 Standards in several wells. These metals will be evaluated as part of the SPD Area Groundwater with potential remedial actions outlined in a Phase IV RIP Modification.
  - h) The monitoring of subsidence/erosion and clearing of overgrowth on the gas line is conducted by Enbridge (formerly Spectra Energy). We are not allowed to conduct clearing activities within their easement.
  - i) Again, the gas line monitoring is done directly by Enbridge.
6. *Is there an LNAPL remaining in the Power Plant Area?*

## Response 6

Regulated amounts of LNAPL or free-phase petroleum are not present in the Power Plant Area based on groundwater gauging and monitoring completed at the Power Plant Area. We only observed de minimis amounts of LNAPL smeared on the former observation well casing from historical bailing of petroleum. Groundwater monitoring for extractable petroleum hydrocarbons over the most recent four seasonal rounds of groundwater monitoring have not contained concentrations of petroleum related constituents above GW-1 cleanup standards.

7. *What is the current status of groundwater quality for metals, SVOCS, and VOCs in the former Power Plant Area? See earlier comments below:*
  - a. *Pursuant to the July 2013 Settlement and Cooperation Agreement entered between the Town and DCAMM for the remediation and restoration of the MSH C&D Area, prior to the relocation of excavated materials, the Power Plant Area remediation will be completed under the SPD permit (see settlement Agreement, Exhibit C). Previously Pennoni Associates identified oil in explorations MW-10, MW-11, MW-12, MW-13, assumed to be related to the decommissioned USTs in the Power Plant Area. To achieve a Permanent Solution, it will be necessary to demonstrate that any oil remaining in this area is stable but this activity is not mentioned in the reports.*

- b. *To achieve a permanent solution in the Power Plant Area, DAMM will need to demonstrate that dissolved concentrations of EPH and VPH fractions and PAHs that migrate with groundwater in the area of the decommissioned Power Plant USTs are below GW-1 standards. This demonstration was not discussed in the Supplemental Phase II nor in the Phase IV RIP for the C&D. Some wells in the Power Plant Area and Potentially Productive Aquifer show C11-C22 Aromatics and PAH compounds in exceedances of the GW-1 Standards (PP-MW-9, 11, 13, 103, etc.). These exceedances may continue unless the upgradient source at the tank area, which may include NAPL around and beneath the decommissioned tanks, is addressed. This area was not proposed for ISCO injections in the November 2013 SPD Phase IV Report. What is the plan for the UST area of the Power Plant? How does DCAMM intend to meet GW-1 criteria within the Potentially Productive Aquifer area with regard to petroleum?*

Response 7

Prior to the C&D Remediation, In-Situ Chemical Oxidation was performed in the former Power Plant area via injections and direct soil blending. This was conducted to treat PCE and petroleum constituents in this area. As noted in the Partial PSC in Section 3.3.2: "...since the submission of the Phase III RAP in February 2012, six additional seasonal groundwater sampling events were conducted. The concentrations of petroleum related constituents were below the applicable Method 1 GW-1 Cleanup Standards with the exception of benzo(a)pyrene in one well (monitoring well PP-MW-103 at 0.3 µg/L versus a GW-1 standard of 0.2 µg/L). Therefore, source area removal was not required. Following the remediation activities, sentinel wells were installed downgradient of the Relocation Area and the decommissioned PP-MW-103. Analytical results displayed four consecutive analytical sampling rounds with concentrations of benzo(a)pyrene below the applicable Method 1 GW-1 Cleanup Standards."

8. *What is the status of the Laundry Parcel remediation?*

Response 8

The Laundry Parcel remediation is expected to commence in 2019. DCAMM has contracted Weston & Sampson to conduct additional investigation/delineation in the area of the former Laundry Building along the Town property line as well as areas with the highest PCE concentrations. Following the delineation, a revised Phase IV RIP will be submitted for PIP comment and is expected to be completed followed by at least four consecutive groundwater sampling rounds to assess if concentrations are below applicable GW-2 standards.

9. *What trends exist in VOC data in groundwater for each monitoring well impacted by CVOCs both in the till and in the PPA?*

Response 9

A Phase IV Status Report #8 was submitted to MassDEP and the Town Repository on January 31, 2019. This report includes trend graphs that display PCE concentrations over the past two years by monitoring well. We are not seeing consistent trends in VOC data within these wells. There is a slight correlation in some wells with groundwater elevation where we are seeing higher PCE concentrations with a higher groundwater table.

10. *What CVOC degradation products are observed in the area where CVOCs were treated?*

Response 10

Currently, we are seeing Trichloroethylene in three wells with one exceedance of the applicable Method 1 Cleanup standard as follows:

SPD-MW-402: one detection (1.2 ug/L), not exceeding GW-1 in 12/18.

CD-MW-503: seven detections (from 1.0 – 2.2 ug/L) from 7/16 to 12/17, not exceeding GW-1 and not present in 12/18 sampling event.

CD-MW-505: one exceedance of GW-1 (6.3 ug/L) in 12/18.

11. *What is the status of available oxidation products or their marker by-products in groundwater monitoring wells in the SPD area?*

## Response 11

We did not observe any oxidation products or their marker by-products in the most recent groundwater monitoring event in 12/18.

*12. What timetable would be placed in the cleanup of the Laundry Parcel portion of the SPD area?*

## Response 12

Additional delineation is expected to commence in Spring 2019 with potential Phase IV RIP activities in summer/fall 2019 following PIP review of the RIP modification. Following the completion of remedial actions, at least 4 consecutive seasonal groundwater sampling events will be conducted to assess if concentrations are below the applicable Method 1 Cleanup Standards.

*13. Can you please provide a timeline for MCP deliverables and a list of each and every public or private entity or person that will be notified of the availability of documents?*

## Response 13

We are currently updating the PIP Plan (previously dated 2010) which will include a new timeline and notification of the availability of documents.

*14. Can an addendum to the Public Involvement Plan be created so that going forward there is a streamlined version of the notification list and process?*

## Response 14

We are currently updating the PIP Plan (previously dated 2010), which will include a streamlined plan for notification.

*15. Many of the trees in the ISCO treatment area have died or are dying, what is the plan to restore the footprint of the area affected by ISCO treatment?*

## Response 15

The trees in the ISCO treatment area and any restoration efforts will be assessed and plans for removal/restoration will be provided in the Phase IV RIP Modification.

*16. What are the access and property needs of DCAMM for additional work needed to be done to complete the remediation?*

## Response 16

Access and property needs will be assessed in the future Phase IV RIP. Most likely access to the site with a staging area will be necessary.

**Bill Massaro****Abutter & PIP Contact**Public Process

1. *In light of the previous RIP Modification submittal and the reported April 2017 submittal of a Draft C&D Completion Statement of DEP, I am concerned that the extension request's proposed schedules and its statement that documents "will be submitted in DRAFT form to MassDEP for comment in conjunction with the PIP process" are not in keeping with the spirit of DCAMM and the Town/Stakeholder cooperation which led to the 26 July 2013 Settlement Agreement. This Agreement's definition of an enhanced MSH Public Information and Participation Process was incorporated into the March 2014 NOI and permitting applications:*

*a. Procedural Issues, Cooperation and Support, Updated MCP Documents and PIP Process Paragraph V.B page 7: In addition to the permit proceedings referenced above, DCAMM will*

*prepare amended Phase III and Phase IV reports under the MCP, incorporating the work agreed to herein to be implemented pursuant to this Agreement. Those reports will be submitted, presented and otherwise subject to the previously established PIP process, including opportunities for public comment.*

- b. *Prior Review of Key Draft Documents – Paragraph C.2.b (1) page 8: DCAMM will consult with Medfield’s Representatives, (identified in paragraph VI.A – Town – K. Trierweiler, copies to W. Massaro, and J. Thompson), or other representatives or committee subsequently appointed by the Selectmen for these purposes regarding permit applications and the MCP Phase III and Phase IV reports, prior to releasing/filing those documents for public comment and/or regulatory review.*

*I request that schedules be revised to reflect the MSH review/release public process as defined in the Settlement Agreement. Also, I would request an immediate re-start of the DCAMM public meetings and working group discussions of SPD investigations and remedial approaches which resulted in Town, public, and stakeholder support of the Phase IV RIP approved in 2014.*

#### Response 1

We are currently updating the PIP Plan (previously dated 2010), which will include an updated schedule outlining public involvement on future reports. Public meetings will be scheduled for relevant documents with the appropriate 20-day public comment period. Following review of public comments, DCAMM may convene a working group to discuss the comments, resolve any issues and finalize the remedial approach.

#### Previous Submittals to DEP

2. *What is the current status of the CAM 14 metals (cadmium, lead, and zinc) in the Zone II and potentially productive aquifer?*

#### Response 2

Groundwater from two of the six C&D Area sentinel wells currently indicate exceedances of lead, and zinc above the applicable GW-1 Standards in several wells. These metals will be evaluated as part of the SPD Area Groundwater with potential remedial actions outlined in a Phase IV RIP Modification.

3. *My understanding is that the standard for this area is GW-1 and that the 4 consecutive quarters requirement in the Settlement Agreement applies. Will this affect completion of the C&D RIP?*

#### Response 3

The metals exceedances in the C&D Area groundwater will not affect the submittal of the C&D Area Phase IV Completion Statement and **Partial** Permanent Solution with Conditions. These reports included the remediation and restoration of the HDA and CRS and not the SPD Area groundwater (which includes groundwater beneath the SPD and C&D Areas). The C&D groundwater will be assessed under the separate SPD Area Groundwater Phase IV.

4. *What is the current status and remediation outlook of PCE in SPD-MW-702 and 703?*

#### Response 4

A Phase IV Status Report #8 was submitted to MassDEP and the Town Repository on January 31, 2019. Please refer to this document for the current groundwater status. Additional groundwater delineation is expected to commence in Spring 2019 with potential Phase IV RIP activities in summer/fall 2019 following PIP review of the RIP modification. Following the completion of remedial actions, at least 4 consecutive seasonal groundwater sampling events will be conducted to assess if concentrations are below the applicable Method 1 Cleanup Standards.

5. *What is the current status and proposed remediation of benzo(a)pyrene in PP-MW-103?*

#### Response 5

Prior to the C&D Remediation, In-Situ Chemical Oxidation was performed in the former Power Plant area via injections and direct soil blending. This was conducted to treat PCE and petroleum constituents in this area. As noted in the Partial PSC in Section 3.3.2: "...since the submission of the Phase III RAP in February 2012, six additional seasonal groundwater sampling events were conducted. The concentrations of petroleum related constituents were below the applicable Method 1 GW-1 Cleanup Standards with the exception of benzo(a)pyrene in one well (monitoring well PP-MW-103 at 0.3 µg/L versus a GW-1 standard of 0.2 µg/L). Therefore, source area removal was not required. Following the remediation activities, sentinel wells were installed downgradient of the Relocation Area and the decommissioned PP-MW-103. Analytical results displayed four consecutive analytical sampling rounds with concentrations of benzo(a)pyrene below the applicable Method 1 GW-1 Cleanup Standards."

6. *Will the proposed C&D AUL conform to the Draft Language in Exhibit E of the Settlement Agreement? (e.g. provisions requiring off-site disposal of all material removed in any maintenance of the gas line?)*

Response 6

Yes, the proposed C&D AUL will conform to language in Exhibit E.

7. *Monitoring and Maintenance*

- a. *Is there a summary of status of reportedly completed Short-Term Monitoring?*
- b. *Is there a summary of status of on-going Long-Term Monitoring/Maintenance and of corrective actions completed or in progress?*
- c. *What is the status of M&M for the Sediment Removal Area?*
- d. *Is there a summary status of on-going Relocation M&M requirements/corrective actions taken (e.g. settlement, erosion, geotextile cover)?*

Response 7

- a) Short-Term Monitoring was conducted during construction activities and was outlined in the C&D Area Status Reports following completion of construction in October 2015.
  - b) Long-Term Monitoring reports from November 2015-November 2017 were provided to the Medfield Conservation Commission. Due to the regime change at DCAMM, monitoring was not conducted in 2018 but is expected to commence in Spring 2019.
  - c) See response 7)b) above.
  - d) See response 7)b) above.
8. *Wetlands*
- a. *Is there a summary status of the on-going M&M requirements for Wetlands (vegetative survivability/coverage – 90% within 2 years and 10% invasives)?*
  - b. *Was the Medfield Conservation Officer notified?*
  - c. *Has a responsible party or subcontractor been identified to replace The Garden Continuum?*

Response 8

- a) The Garden Continuum previously submitted wetlands monitoring reports to DCAMM for the initial growing season in 2016. Wetland monitoring was not conducted in 2017 or 2018, however it is expected to re-start in Spring 2019.
- b) We are unsure if DCAMM submitted these 2016 reports to the Medfield Conservation Commission and will contact the Commission to confirm if they were. DCAMM will submit these 2016 reports and any new monitoring reports starting in 2019 to the Conservation Commission.
- c) Weston & Sampson is expected to continue the wetlands monitoring in Spring 2019.

Draft RIP SPD Modification-SPD Area Groundwater February 2017

9. *Access: Paragraph 3.7 statement that access for workers and equipment is on property "owned by the responsible party" is not correct. Although the approximate 0.88 acre surrounding the now demolished Laundry Building was retained by DCAMM pending SPD PCE Permanent Solution, the current access to the parcel is on land purchased by the Town under the 2014 Land Disposition. DCAMM has been*

*advised, as provided under the LDA, that the Town does not wish to retain a permanent access to the Overlook/SPD area on Town property and that DCAMM should proceed with construction of a permanent access road on Commonwealth-retained MSH property.*

Response 9

DCAMM is currently addressing site access.

10. *Soil Blending*

- a. *What are the specific locations proposed for in-situ soil blending?*
- b. *Are these the locations, assuming success in getting below GW-2 standards, which would allow a partial completion of the SPD Area GW and allow transfer of the Laundry Parcel to the Town while attenuation of the rest of the SPD area continues?*
- c. *The Town had agreed that chemicals for the previous ISCO series could be stored in the former Maintenance/Engineering. Additional storage requirements for chemicals under the proposed RIP Modification should be discussed with the Town.*
- d. *If final amount of on-site excavated, non-impacted soil is insufficient to meet blending amounts required, what conditions/restrictions will be placed on importation of soil from off-site locations?*
- e. *What precautions will be taken for equipment de-contamination? Town should be advised of proposed route for off-Site transport of contaminated soil*

Response 10

- a) The specific locations will be updated in the revised Phase IV RIP, but will include the area of the Former Laundry Building along the Town property line and the areas with the highest PCE concentrations. The location will be refined following completion of a grid based sampling effort to target the blending in areas of highest concentration.
- b) Yes, it is a goal of the proposed revised Phase IV RIP to reduce concentrations in the Laundry Parcel to below GW-2 for property transfer and to prevent back diffusion of residual PCE to this parcel.
- c) So noted.
- d) This will be addressed in the revised Phase IV RIP that will be submitted to the PIP for comment.
- e) This will be addressed in the revised Phase IV RIP that will be submitted to the PIP for comment.

11. *In conclusion I would again suggest an immediate re-start of the DCAMM working group discussions and public meetings.*

Response 11

So noted, DCAMM will consider reinstating working group discussions if comments on the future PIP-reviewed documents demonstrate significant concern with plans for remediation, assessment or regulatory closure. Public meetings will be held for pertinent documents and DEP submittals.

**Appendix B**

Public Involvement Plan Schedule

DCAMM  
 Medfield State Hospital - PIP  
 DRAFT - Schedule Subject to Change

Activity			2019																													
			May		June				July				August				September				October				November				December			
			Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4
C&D Area	Landfill Monitoring Engineering	Semi-Annual Monitoring																														
		Bio-Stabilization Habitat																														
		Annual Settlement Monument Survey																														
		Wetlands Monitoring																														
	Landfill Monitoring Maintenance	Mowing of Promontory																														
		Mowing of Promontory Side Slope																														
		Trail Vegetation Clearing																														
		Rain Garden Maintenance																														
	Inventory of Planted Areas & Rain Gardens																															
SPD Groundwater	Quarterly GW Sampling	2019 (May, Aug, Nov)																														
		2020 (Feb, May, Aug, Nov)																														
		2021 (Feb)																														
	SPD Area Delineation	Additional GW Delineation around Former Laundry Bldg.																														
	RIP Mod. Oversight	Implementation of RIP Modification																														
	MCP Tasks & Associated PIP	Status Reports #9, 10, 11, 12 (June & Dec 2019/2020)	Final RIP Modification																													
			PIP (RIP Mod)																													
			Phase IV Completion Statement (pending RIP results)																													
PIP (Phase IV Completion)																																
PIP Plan Update																																

DCAMM  
 Medfield State Hospital - PIP  
 DRAFT - Schedule Subject to Change

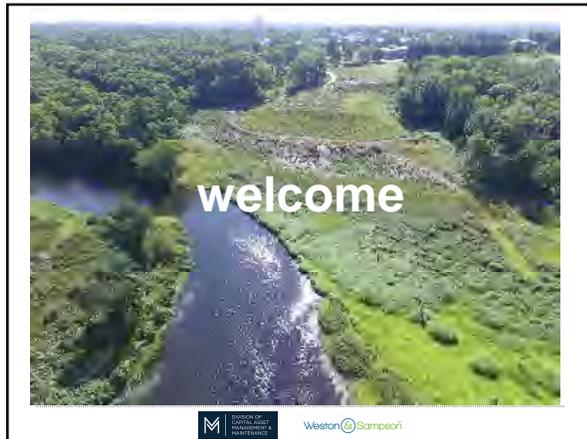
Activity			2020																															
			January				February				March				April				May				June				July				August			
			Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4
C&D Area	Landfill Monitoring Engineering	Semi-Annual Monitoring																																
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			Phase IV Completion Statement (pending RIP results)																															
PIP (Phase IV Completion)																																		
PIP Plan Update																																		

DCAMM  
 Medfield State Hospital - PIP  
 DRAFT - Schedule Subject to Change

Activity			2020 Cont'																2021									
			September				October				November				December				January				February					
			Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4	Wk 1	Wk 2	Wk 3	Wk 4		
C&D Area	Landfill Monitoring Engineering	Semi-Annual Monitoring																										
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	SPD Area Delineation	Additional GW Delineation around Former Laundry Bldg.																										
	RIP Mod. Oversight	Implementation of RIP Modification																										
	MCP Tasks & Associated PIP	MCP Tasks & Associated PIP	Status Reports #9, 10, 11, 12 (June & Dec 2019/2020)																									
			Final RIP Modification																									
			PIP (RIP Mod)																									
Phase IV Completion Statement (pending RIP results)																												
PIP (Phase IV Completion)																												
	PIP Plan Update																											

## APPENDIX C

### Meeting Presentations & Overviews



1



2

### Project Team Members & Intros

- Lauren Lesinski, LSP, CHMM: Deputy Director, Environmental Services
- Jason Kruckas: Senior Operations Manager

- Frank Ricciardi, PE, LSP: Vice President
- Rebecca Mauser-Hoye: Project Engineer

3

### Agenda

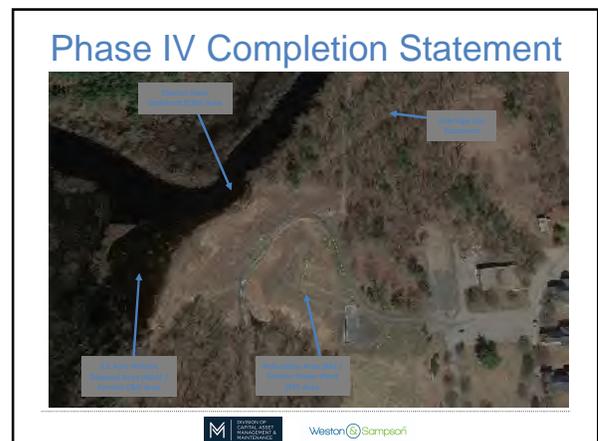
Questions & Answers at the End of the Presentation

4

### PIP Plan Updates

- DCAMM Contact: Jason Kruckas
- Editorial (e.g., DCAM to DCAMM)
- SPD Permit Extension Dates
- Description of Release Conditions Update
  - Site Description & History
  - Summary of Completed Environmental Studies
  - Ongoing Environmental Studies
  - Update Town Contacts
- Update Tables
- Public Involvement Plan Schedule

5



6

### Social & Environmental Positive Impacts

- Excavation of a Majority of Fill Within the HDA
- Removal & Off-Site Disposal of the Most Highly Impacted Fill
- Relocation of Remaining Excavated Fill to the Former PP Area
- Covering the Relocated Fill with 5 ft of Clean Soil and Crushed Concrete
- Mechanical Sediment Dredging of the CRS Area
- Restoration and Reestablishment of the Natural Resources and Floodplain along the Charles River
- Enhancing Access to and Restored Open Space



7

## Phase IV Scope

Remediated from July 2014 – October 2015

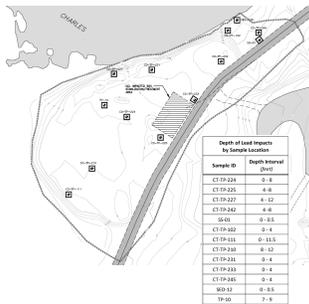
- (1) Excavation, Stabilization, and Off-Site Disposal of Approximately 550 cy of Lead Impacted Fill
- (2) Relocation of 30,420 cy of Fill
- (3) Construction of 5 ft Cover System over Relocated Fill
- (4) Removal of 200 cy of Petroleum-Impacted Sediment from the Charles River



8

## (1) Lead Impacted Fill

- 13 Areas with Soil that Exceeded UCL for Lead
- Excavated
- Stabilized/Treated In-Situ with Enviroblend®
- Field Screened with XRF
- Composite Confirmatory Sampling for TCLP



Sample ID	Depth Interval (ft)
CI-19-224	0 - 2
CI-19-225	4 - 6
CI-19-227	4 - 12
CI-19-240	4 - 6
845	0 - 0.5
CI-19-252	0 - 4
CI-19-253	0 - 15.5
CI-19-258	0 - 12
CI-19-255	0 - 4
CI-19-253	0 - 4
CI-19-245	0 - 4
80-12	0 - 0.5
19-01	0 - 8



9

## (2) Relocation

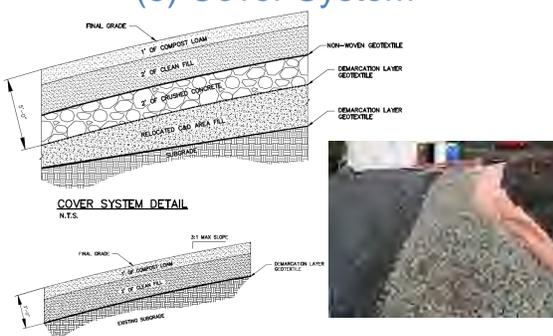
- Asbestos Containing Fill from River Bank to Gasline
- Fill Removed to Natural Subgrade
- 30,420 cy: Asbestos Containing Fill Relocated to RA
- 350 cy: Midden Waste Disposed Off-Site
- 3,386 cy: Uncoated Concrete used for Cover System
- 23 tons: Coated Concrete Disposed off-Site
- 50 tons: Metal Recycled off-Site
- Post-Excavation XRF Field Screening and Native Soil Sampling following Fill Excavation and Relocation





10

## (3) Cover System

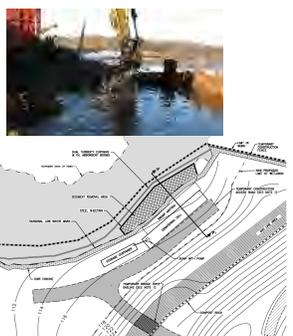




11

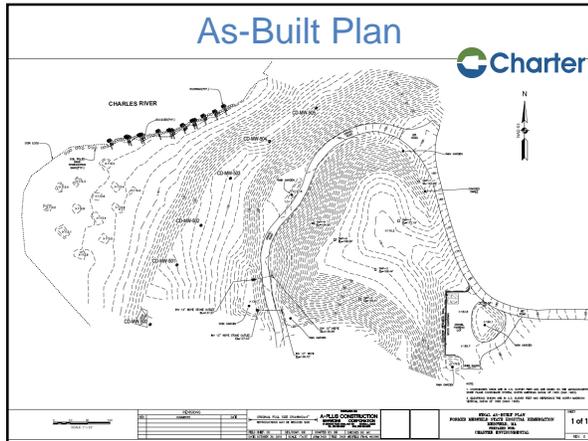
## (4) Charles River Sediment (CRS)

- Petroleum Impacted Sediment
- Located above a Dense Underlying and Un-Impacted Yellow/Beige Clay Layer
- Mechanically Dredged
- Dual Turbidity Curtain with Monitoring
- 200 cy
- Transported Off-Site
- Visual Confirmation that Sediment was Removed to Native Clay Layer





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### Partial Permanent Solution with Conditions (PSC)

**HDA Remedial Approach**

- Excavation of Historic Fill in the HDA, Confirmatory Native Sampling, and Relocation to PP Area
- Prevents Future Direct Contact Exposure to the Impacts in Surface & Subsurface Soils

**CRS Remedial Approach**

- Removal of Petroleum-Impacted Sediment
- Eliminates Future Direct Contact Exposures to Sediment
- No Cleanup Required for Surface Water

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### Method 3 Human Health Risk Characterization

- A Condition of No Significant Risk Exists for:
  - Current & Future Unlimited use of the RA (inclusive of cumulative exposure to surface soil, sediment, & surface water)
  - Best Management Practices Should be Used if Vegetable Gardening Occurs in RA
- Imminent Hazard Condition does not Exist

• RA performed by TRC

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### Power Plant Area

- Petroleum fractions & PAH Exceedances Related to Historical Release of No.6 Fuel Oil
- Limited to Vicinity Immediately Surrounding Former Tank Pads
- Since 2012, 6 Consecutive Rounds with Petroleum Constituents below GW-1
  - With the Exception of Benzo(a)pyrene in PP-MW-103
  - 0.3 µg/L versus a GW-1 standard of 0.2 µg/L
  - Source area Removal was not Required
- Sentinel Wells were Installed Downgradient of the RA and Decommissioned PP-MW-103
  - Analytical Results Displayed 4 rounds with Benzo(a)pyrene below GW-1

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### Ecological Risk Characterization

- Post-Remediation Concentrations of Metals in the HDA do not Constitute a Significant Risk or Harm to the Environment



• Ecological RA performed by Exponent

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## Activity and Use Limitation

- Conforms to Settlement Agreement
- ACM Fill Still Present
  - Natural Gas Easement (3 ft cover)
  - Relocation Area (5 ft cover)
- Prohibits Exposure to ACM Fill Below Cover System

Restricted Uses

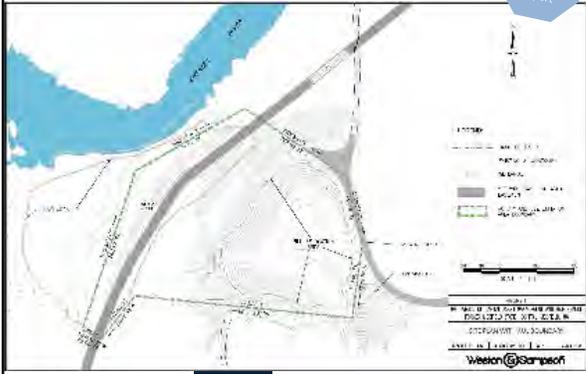
- Use as a Residence, school, daycare, children's nursery, commercial, mixed-use or industrial facility that penetrates the Cover or does not prevent direct contact
- Construction of buildings, structures, improvements, and utilities that require excavation, disturbance, penetration, or relocation of soil beneath cover (except those allowed)
- Cultivation of fruits and vegetables, except raised beds
- Planting of deep rooted trees
- Any activity that may damage the Cover or disturb soils without a HASP and SMP under an LSP




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## AUL Boundary

AUL Survey Included in Report






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## Document Availability

Handed out tonight for comment

Hard & Electronic copies: Medfield Library Repository & Town Offices (Town Administrator & Board of Health)

Hardcopies: MassDEP CERO (finalized reports following PIP Review)  
8 New Bond Street, Worcester, MA




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## Public Comment

For additional information or to submit written questions/comments, please contact:

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Public comments are due on or before February 26, 2019




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# Questions?






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