



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Metropolitan Boston – Northeast Regional Office

1998 NOV -9 P 3: 50

ARGEO PAUL CELLUCCI
Governor

OFFICE OF THE CITY CLERK
CAMBRIDGE, MASSACHUSETTS

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Secretary

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Commissioner

NOV 04 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Massachusetts Highway Department
One South Station
Boston, MA 02110-0000

RE: Cambridge
Prison Point CSO
1 Msr. O'Brien Hwy.
RTN# 3-15341

Attn: Gloria A. Fry
ROWARS Manager

APPROVAL OF RELEASE
ABATEMENT MEASURE
M.G.L. Chapter 21E, 310
CMR 40.0000

Dear Ms. Fry:

On October 21, 1998, the Department of Environmental Protection (DEP) received a Release Abatement Measure (RAM) Plan from you for the performance of a remedial action at the above referenced site. The Release Abatement Measure Plan was prepared by William Swanson, a Licensed Site Professional (License #6406) with Camp, Dresser & McKee, Inc., and was submitted to DEP Bureau of Waste Site Cleanup (BWSC) for approval pursuant to 310 CMR 40.0440 of the Massachusetts Contingency Plan (MCP).

Release Abatement Measures are a class of remedial actions that are voluntarily undertaken at locations where a release of oil and/or hazardous material has occurred (disposal sites). Such response actions are intended to reduce risks at the disposal site, and/or to increase the cost effectiveness of future response actions which may be necessary at the disposal site, and are subject to approval by DEP/BWSC pursuant to Massachusetts General Law, Chapter 21E (MGL, c.21E), and 310 CMR 40.0000.

The purpose of this correspondence is to: (a) inform you that the proposed Release Abatement Measure has been conditionally approved pursuant to 310 CMR 40.0443; (b) advise you of your potential liabilities under M.G.L., c. 21E for assessing and remediating this release of oil and/or hazardous material; and, (c) specify the conditions under which this Release Abatement Measure is granted approval.

This information is available in alternate format by calling our ADA Coordinator at (617) 574-6872.

205A Lowell St., Wilmington, MA 01887 • Phone (978) 661-7600 • Fax (978) 661-7615 •
TDD # (978) 661-7679

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The proposed Release Abatement Measure Plan, as submitted by Mr. Swanson, requests approval of the following activities:

- 1) Excavating up to 3,000 cubic yards of contaminated soils containing polynuclear aromatic hydrocarbons (PAHs) along the northern side of the property as part of central artery construction contract C19B1;
- 2) Dewatering the excavation on an as needed basis, using a pumping system to remove groundwater. Recovered water will be managed in one of four ways:
 - a) Reinjecting on site,
 - b) Trucked off site for disposal,
 - c) Discharging to a storm drain under the project wide NPDES permit from the US EPA (with or without treatment, depending on contaminant types and levels), or
 - d) Discharging to the sanitary sewer under a valid MWRA discharge permit (with or without treatment, depending on contaminant types and levels).
- 3) Disposing of contaminated soils generated during the above referenced activities at Quarry Hills Recreational Complex in Quincy, Massachusetts.

The Department's approval of the activities described above is contingent upon your adherence to the following conditions of approval, and to the provisions of all applicable DEP Policies governing response actions. Your initiation of the approved activities will constitute your understanding and acceptance of these conditions of approval.

I. General Conditions

- 1) This response action must be performed in a manner and to a degree which ensures the protection of human health, safety, public welfare and the environment;
- 2) This response action must be conducted under the direct supervision of a competent professional with specific experience in site remediation/environmental engineering practices, using good engineering procedures and accepted construction practices, and must be managed, supervised, actually performed, or periodically reviewed by a Licensed Site Professional;
- 3) The Release Abatement Measure must be conducted in compliance with all applicable public involvement provisions specified in 310 CMR 40.0447;
- 4) Pursuant to 310 CMR 40.0443(7), the remedial actions proposed in this Release Abatement Measure Plan must be initiated within one (1) year of the date of this approval letter;

- 5) Pursuant to 310 CMR 40.0446(6), this Release Abatement Measure will not be considered complete until all stockpiled/stored Remediation Waste generated as a result of these activities has been removed from the site, or treated, recycled or reused at the site, unless a Remedy Implementation Plan pursuant to 310 CMR 40.0870 is submitted to the Department as an attachment to the Release Abatement Measure Completion Statement;
- 6) Pursuant to 310 CMR 40.1020, the feasibility of reducing the concentrations of oil and/or hazardous material in the environment to background conditions, or to levels which approach background conditions, must be evaluated before a Class A Response Action Outcome can be achieved at this site.

II. Soil Excavation & Management

A. Soil Excavation.

- 1) The excavation, stockpiling and reuse or disposal of contaminated soil at this site is hereby limited to 3,000 cubic yards. For the purposes of this condition, "contaminated soil" is defined as soil containing concentrations of oil and/or hazardous material equal to or greater than the applicable site Reportable Concentration(s);
- 2) Contaminated soils should be field screened as appropriate and/or undergo field analysis at the point and time of excavation in order to: (i) aid in the identification of contaminated areas and/or media; (ii) target specific areas and/or media for laboratory analysis; and (iii) segregate highly contaminated soils from less contaminated or uncontaminated soils so as to optimize soil recycling/disposal options;
- 3) Security provisions should be developed and maintained around the excavation and on-site soil storage areas to ensure that only qualified personnel are allowed access. Excavations performed in public areas should generally not be left open overnight;

B. Soil Management

- 1) The on-site segregation, storage and/or reuse of contaminated soils at this location must be conducted in accordance with the provisions of 310 CMR 40.0030, "Management Procedures for Remediation Wastes";
- 2) Contaminated soils shall be stockpiled on 6 mil polyethylene sheeting, or other impermeable barrier (e.g., concrete, bituminous pavement), and covered with 6 mil polyethylene or other suitable material such that no odors and/or dust conditions are created at surrounding off-site receptors;
- 3) Stockpiled contaminated soils must be removed/reused on site within 120 days of generation;
- 4) The transportation of contaminated soil/remediation wastes from the subject site must be performed in compliance with the Bill of Lading Process described in 310 CMR 40.0034, or such materials may be transported off-site using a licensed hazardous waste hauler and a Massachusetts Hazardous Waste Manifest, pursuant to 310 CMR 30.000.

III. Groundwater Management

A. General Provisions

- 1) All groundwater generated as a result of response actions must be managed in accordance with 310 CMR 40.0040, entitled "Management Procedures for Remedial Wastewater and Remedial Additives".
- 2) The discharge of groundwater from or to the site may require the operation of a treatment works. The need to implement such a treatment works is to be evaluated at a minimum of twice daily for each day of groundwater pumping. The evaluation should include, at a minimum:
 - a) A visual inspection of the pump system influent for signs of contamination (i.e. sheens/product, odors, etc.), and
 - b) An analysis of the pump system influent using MA DEP Jar Headspace procedure, as referenced in policy DEP WSC#400-89. A headspace in excess of 5 parts per million (on a volume/volume basis) will require the cessation of pumping activities until a sample can be analyzed and, if appropriate, a treatment system constructed to address contamination.
- 3) Be reminded that 310 CMR 40.0041(9) states that except for discharges of Remedial Additives and Remedial Wastewater which does not require treatment, all RPs, PRPs, and other persons must engage a Wastewater Treatment Plant Operator, having a minimum of Grade 2 certification to inspect the treatment works. Such inspections shall occur at intervals of 30 days during the first 3 months following initiation of the discharge, and every three months thereafter for the duration of the discharge. The results of the inspection(s) and certification shall be included with the pertinent monitoring data transmitted to the Department.
- 4) The treatment works should be constructed in a manner that will prevent the discharge of free phase oil or contaminated sediments.
- 5) All contaminated sediments must be managed in accordance with 310 CMR 40.0030, Management Procedures for Remediation Waste.

B. Groundwater Reinjection

- 1) All groundwater reinjected on the site must be introduced to the subsurface in locations which are hydraulically upgradient (i.e. the northeast) portion of the site;
- 2) All discharges must not erode or otherwise impair the functioning of the surficial and subsurface soils, infiltrate underground utilities, building interiors or subsurface structures, result in groundwater mounding within 2 feet of the ground surface, or result in flooding of, or breakout to the ground surface; and
- 3) All discharges must not be made to a location at which the concentrations of oil and/or hazardous material in the groundwater at such location are significantly lower than the concentrations of oil and/or hazardous material in the discharge; and

- 4) All discharges must not exacerbate existing conditions, or prevent or impair the performance of remedial actions, at the disposal site.

C. Groundwater Discharge to Storm Drain/ Sewer

- 1) All discharges to storm drains must comply with the project wide NPDES permit and subsections 3.04 and 3.14 of contract specification 120.080, entitled "Contaminated Soil Excavation".
- 2) All discharges to the sewer system must comply with all aspects of the discharge permit issued by the MWRA and subsections 3.04 and 3.14 of contract specification 120.080, entitled "Contaminated Soil Excavation".

IV. Required Submittals

Pursuant to the provisions of 310 CMR 40.0440, within 120 days of the date of this letter, one of the following reports must be received by DEP:

- 1) A Release Abatement Measure Completion Statement (DEP Form BWSC-106, § G) and a completion report, as specified in 310 CMR 40.0446, in cases where the proposed response actions have been completed; or
- 2) A Release Abatement Measure Status Report, as specified in 310 CMR 40.0445, (accompanied by DEP Form BWSC-106), if the proposed response actions are ongoing; or
- 3) A Response Action Outcome Statement (DEP Form "BWSC-004"), as specified in 310 CMR 40.1000, in cases where the proposed response actions have eliminated significant risk at the site such that no further response actions are necessary.

Reports concerning Release Abatement Measures should be addressed to DEP, Bureau of Waste Site Cleanup, Risk Reduction Section, 205A Lowell Street, Wilmington, MA 01887.

Limitations

This letter constitutes conditional authorization from DEP/BWSC to proceed with the response action you have proposed to conduct. Such authorization is required by M.G.L. Chapter 21E, the Massachusetts Contingency Plan (MCP), and other applicable DEP/BWSC policies. However, you should be aware of the following limitations and additional considerations:

- 1.) In reviewing the Release Abatement Measure Plan, our primary intent was to ascertain whether the proposal, as presented, appeared to be protective of public health and environmental interests, and consistent with pertinent DEP regulations, policies, and accepted engineering practices. Our approval in this matter does not necessarily mean that we have determined that the proposed response action is optimal, sufficient, or cost-effective. It is incumbent upon the environmental professional directing response operations to fully explain, document, and defend design and operational decisions. All such activities can be audited by DEP in conformance with the provisions of 310 CMR 40.1100;

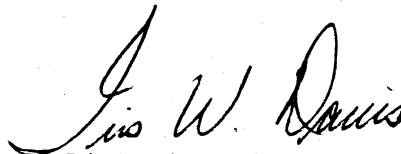
- 2.) This approval is granted by DEP/BWSC under the provisions of M.G.L. Chapter 21E, the MCP, and other applicable DEP/BWSC policies. It is the responsibility of parties conducting response actions to obtain any other necessary federal, state, or local permits or approvals; and
- 3.) The Department's decision in this matter was based upon the information contained in the referenced proposal, and any other accompanying/previous submittals, and would be subject to review if these sources contained any material omissions or misstatements.

Your cooperation in this matter is appreciated. If you have any further questions regarding this matter, please contact Kyle MacAfee at (978) 661-7600 or at the letterhead address. All future correspondence regarding this location must reference the DEP Release Tracking Number listed in the subject heading.

Very truly yours,



Kyle MacAfee
Environmental Engineer



Iris Davis
Section Chief
Permits/ Risk Reduction Branch

cc: Mayor Francis H. Duehay, Cambridge City Hall, 395 Mass. Ave., Cambridge, MA 02139
Cambridge Board of Health
William Swanson, Camp, Dresser & McKee, Inc., Ten Cambridge Center, Cambridge, MA 02142
Data Entry/File

7425

A communication was received from State
Department of Environmental Protection
transmitting approval of a Release Abate-
ment measure pursuant to Mass. General Laws
Chapter 21E, 310 CMR 40.000 for 1 Monsignor
O'Brien Highway.

In City Council November 16, 1998.

PLACED ON FILE